

# Programs for Minors on Campus

Training for Programs for Minors Coordinators and  
Program Directors (July 2021)

# TBR COMMITMENT

TBR institutions are committed to promoting a safe environment for children who participate in on-campus programs and activities, as well children taking part in off-campus programs and activities sponsored by a college.

TBR and institutional policy are designed to foster a culture committed to preventing, recognizing, reporting and addressing child abuse and child sexual abuse.

## Training Goals

- Reporting—when and how to report
- Responsibilities—your responsibilities as a Program for Minors Coordinator or Program Director
- Prevention—actions prohibited by policy
- Recognition—understand and recognize potential child abuse

# Reporting Obligations

Tennessee law requires reporting by ANY PERSON who:

- (a) knows of PHYSICAL or MENTAL HARM to a child if
  - (i) the nature of the harm reasonably indicates it was caused by brutality, abuse, or neglect, or
  - (ii) on the basis of available information, the harm reasonably appears to have been caused by brutality, abuse or neglect.
- (b) knows or has reasonable cause to believe that a child has been SEXUALLY ABUSED, regardless of whether the child has sustained an apparent injury as a result of the abuse.

These laws apply to ALL adults, even if the child abuse or child sexual abuse did not occur in connection with an institutional program.

# External Reporting

- Call 911 for a life-threatening emergency
- Reports of child abuse or child sexual abuse must be made immediately to the Tennessee Department of Children's Services at the Central Intake Child Abuse Hotline:

**1-877-542-2873**

or

**1-877-237-0004**

# Internal Reporting Requirements

- Must report to DCS and INTERNALLY
- Internal reporting—after reporting to the Department of Children’s Services, report to
  - The Programs for Minors Coordinator (PMC)
  - Employees should also report to their supervisor or Program Director
- The PMC/Program Director/supervisor must
  - Ensure that a report has been made to DCS
  - Inform the President
- The PMC/Supervisor/Program Director/President must report to person responsible for Clery Act compliance

# Defined Terms

- “Programs for Minors Coordinator” (PMC) is the person at the institution with primary responsibility for compliance with policy and for oversight of Covered Programs and Program Directors.
- A “Program Director” is the person primarily responsible for the management and oversight of a Covered Program. Responsibilities include:
  - Identifying Covered Adults
  - Ensuring the Covered Program’s compliance with policy
- “Covered Adults” are individuals eighteen (18) years of age and older who are expected to have direct contact with a minor in a Covered Program by reason of their employment, contractual, or volunteer status with the institution. Covered Adults can be employees, students, volunteers, or contractors.

# Covered Programs

Covered Program means:

- A program or activity in which minors may participate (in person or online) that is sponsored by the college or
- A program or activity in which minors may participate that is sponsored by an entity other than the college and involves use of college owned or controlled facilities.

Covered Program does not include:

- A program or activity where it is required or expected that a minor be accompanied by a parent or guardian;
- A program or activity designed primarily for enrolled college or high school students, including dual enrollment, middle college, credit courses, and community service projects organized by the college;
- A program or activity open to the general public;
- A program or activity using the college's facilities that is conducted by other educational institutions, including but not limited to local K-12 schools, such as science fairs or Destination Imagination;
- Orientation and campus tour/visitation programs;
- Field trips supervised by a minor participant's school or organization and not sponsored by the college;
- Social functions that may be attended by minors accompanied by a parent or guardian; or
- Student teaching practicums

# PMC Responsibilities

- Post and circulate to Program Directors the institutional Programs for Minors on Campus policy modeled on TBR Policy 7.04.00.00
- Include PMC contact information in institutional policy.
- Identify Covered Programs
  - College-sponsored programs and
  - Third-party sponsored programs
- Identify the Program Director for each Covered Program
- Educate/train Program Directors
- Assist Program Directors with identifying Covered Adults
- Determine logistics for conducting background checks and training

# PMC Responsibilities

- After Program Directors identify Covered Adults, determine which type of background check will be administered. See TBR Policy 7.04.00.00, Section I.B.1-4.
  - Most Covered Adults will need the same criminal background check as employees subject to background checks.
  - If a Covered Program is not sponsored by the institution, determine whether it is sponsored or operated by an employee of the institution (using institutional property or resources).
  - Covered Adults who are student volunteers don't need a background check. Reviewing the National Sex Offender public website and Tennessee Department of Health online abuse registry is sufficient.
  - Determine whether an exception is appropriate (following consultation with President), and if so, comply with Section I.C of TBR Policy 7.04.00.00.

# PMC Responsibilities

- If a background check reveals one or more convictions, determine what, if any, action to take. See Section I.B.5 of the Policy.
- Ensure that Covered Adults receive training prior to working in a Covered Program. Training is linked to TBR Policy 7.04.00.00.
  - Institutions have flexibility to determine how to confirm training by Covered Adults. E.g., the PMC may confirm training personally or delegate to PDs and monitor.

# Program Director Responsibilities

- Understand the policy.
- Identify Covered Adults.
- Provide a list of Covered Adults to PMC in time for background checks and completion of training. Work with PMC as necessary on background checks and training.
- Manage and oversee compliance with the Policy.

# Covered Adults Must NOT

- Be alone with a minor
- Be alone in a vehicle with a minor (even with parental consent)
- Have physical contact or communicate (either in person or electronically) with minors, except as appropriate to the nature of the program
- Use college facilities or resources to interact with minors outside of the Program
- Meet a minor off-site or after hours, even if another Covered Adult is present
- Permit minors in dangerous places (e.g., welding labs)

# Covered Adults Must NOT

- Strike, slap, administer corporal punishment, or touch minor inappropriately
- Humiliate, threaten, ridicule, or degrade a minor
- Use language encouraging a minor to keep a secret (“This is just between us”)
- Wear inappropriate clothing while interacting with minors
- Sleep in the same or room or enclosed space (i.e., a tent) as a minor
- Dress or undress in the presence of a minor
- Shower or bathe in the presence of a minor
- Invade privacy (e.g., intruding on showers or changing activity)
- These prohibitions do not apply to relatives

# Covered Adults Must NOT

- Possess or use alcohol, illegal drugs or be under the influence during a Covered Program
- Provide alcohol, tobacco, drugs, prescription drugs, or medication to a minor
- View pornography during the Program, make pornography available to a minor, or assist a minor in gaining access
- Take a photo or video of a minor or post information about a minor on the internet without written permission of parent or guardian
- Give a personal gift to a minor

# Types of Child Abuse

- **Physical abuse:** Non-accidental trauma or physical injury of a child, or failure to protect a child from harm.
- **Neglect:** Failure to provide for a child's physical survival needs to the extent that there is harm, or risk of harm, to the child's health or safety.
- **Sexual abuse:** When a child is involved in intentional sexual acts that produce sexual arousal and/or gratification for the perpetrator or sexual behaviors/situations in which there is a sexual component.
- **Psychological harm:** A repeated pattern of caregiver behavior or extreme incident(s) that convey to children they are worthless, flawed, unloved, unwanted, endangered. May include both abusive acts against a child and failure to act.

Tenn. Dept of Children's Services, <https://www.tn.gov/dcs/program-areas/child-safety/reporting/faqs.html>

# Possible Indicators of Abuse/Neglect

- The child has repeated injuries that are not properly treated or adequately explained.
- The child begins acting in unusual ways ranging from disruptive and aggressive to passive and withdrawn.
- The child acts as a parent toward his or her brothers and sisters or even toward their own parents.
- The child may have disturbed sleep (nightmares, bed wetting, fear of sleeping alone, and needing nightlight).

# Possible Indicators of Abuse/Neglect

- The child loses his/her appetite, overeats or may report being hungry.
- There is a sudden drop in school grades or participation in activities.
- The child may act in ways that are developmentally inappropriate, such as sexual behavior that is not normal for his/her age group.
- The child may report abusive or neglectful acts.
- *Note: The above signs can indicate something is wrong but do not necessarily indicate abuse or neglect.*

Tenn. Dept of Children's Services, <https://www.tn.gov/dcs/program-areas/child-safety/reporting/faqs.html>

# Questions?

- Consult institutional Programs For Minors on Campus Policy for additional information.
- The institution's Programs for Minors Coordinator is available to answer additional questions.