

Rhodes College Policies for Summer Programs

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Statement of Responsibility for All Program Participants and their Parents¹

Behavioral Responsibilities: All participants will at all times comply with rules, standards, and instructions for student behavior set forth in the Rhodes Student Handbook and in this document. Rhodes reserves the right to enforce appropriate standards of conduct and specifically reserves the right to terminate participation in the program by anyone who fails to maintain these standards or for any action or conduct that Rhodes considers to be incompatible with the interests, harmony, comfort, and welfare of other participants. It is important that participants conduct themselves in an entirely honorable manner during their association with this program, and avoid any act that might reasonably be construed as lying, cheating, or stealing.

Release of Liability: The undersigned, in consideration for being permitted to participate in the program, for him- or herself, his/her heirs and his/her personal representatives, hereby forever releases and discharges the College, its trustees, officers, faculty, staff, employees and agents (Released Parties), from any and all liability arising out of the undersigned's participation in the program, including, without limitation, liability for any claims or causes of action whatsoever arising out of any damage, loss, or injury (including death), to the participant or to property owned by or in the custody of the participant while engaged in the program.

Academic Responsibility: For the satisfactory completion of the course and/or the awarding of academic credit (in relevant programs only), participants are expected to attend all lectures and seminars and to complete all assignments in a timely way.

Photos: Participants consent to the use of their photographs, comments, and photographic likenesses by Rhodes for publicity purposes insofar as Rhodes may in its discretion think fit.

Health and Safety: All participants shall assume responsibility for medical treatment and the cost of such treatment while in the program.

Rhodes reserves the right to take whatever action it may consider warranted by circumstances relating to the health and safety of the participants, and the undersigned hereby releases Rhodes from any liability for such decisions or actions. The participant hereby authorizes Rhodes and its agents and employees at their discretion without obtaining any further consent to arrange such medical services and treatment as may be deemed necessary for the participants at the sole risk and expense of the participants or their parents.

Parents will normally be contacted to pick up their child if any of the following obtain:

1. Illness that prevents a participant from taking part in activities for more than 24 hours.
2. Illness that results in greater need for care than we can provide.
3. Fever (above 100°F under the arm, above 101°F in the mouth, above 102°F in the ear) accompanied by other symptoms.
4. Diarrhea – two or more cases of loose stool.
5. Vomiting – incidents over two days.

¹ The Rhodes College Policies Summer Programs has been compiled and adapted from a number of sources: The College Student Handbook, the Statement of Responsibility for the Summer Writing Institute at Rhodes College (2017), the University of the South Policy on the Protection of Minors with permission from the University (2017).

Procedures in cases of medical emergencies:

1. Determine if the emergency is life-threatening. Contact Campus Safety.
2. In cases that are life-threatening, contact emergency medical services first (911).
3. Contact the parents at the emergency contact numbers provided.

Substance Abuse Policy: The sale, distribution, use or possession of a controlled drug or substance, or unauthorized prescription while a participant on this program represents a serious breach of conduct and will result in expulsion from the program and notification of the appropriate officials of the parent institution and/or others who may be concerned. Also, to be present, though not a participant, during a violation of this policy will in itself be deemed reprehensible and subject to penalty.

Weapons Policy: Rhodes College strictly prohibits possession of weapons of any type by students, employees or visitors on all College property, including but not limited to firearms, B-B guns, pellet guns, bows and arrows, hunting knives, explosives or any other object that could be used as a deadly weapon. (Weapons are defined in the Tennessee Code Annotated). Violators (including those individuals with valid Tennessee gun carry permits) are subject to suspension, expulsion, termination, or any combination of appropriate sanctions.

Any violation of this policy should be reported immediately to Campus Safety at (901) 843-3880. Prohibition of such weapons extends to the property and/or vehicles controlled by an individual while on College property. Questions regarding this policy should be directed to the Director of Campus Safety or Director of Human Resources.

Room Searches and Safety Inspections

The Director of the program or the Director's designee, in consultation with the Director of Campus Safety and/or Director of Residence Life, may authorize a search of a student's premises if there is reasonable cause to believe that a violation of college policy is occurring or has occurred.

Authorized personnel of Rhodes have the right to enter student rooms at any time for purposes of maintenance and repair, inspection of health and safety conditions, and investigation of violation of College regulations.

Indemnity: The participant, in consideration for being permitted to participate in the program, both on campus and off campus, further agrees to assume the liability for, and indemnify and defend Rhodes from, any and all claims or damages for any sickness, personal injury, death, property damage or any other loss that may arise, either wholly or in part, out of any negligent, intentional or other act or omission by the participant in connection with the program, both on campus and off campus, including those claims or damages that may arise out of the joint or concurrent negligence of a third party, the Released Parties, or any of them.

Cancellation Policy: In the event of cancellation of an entire session of this program before commencement of the program, all monies paid to Rhodes prior to that time will be refunded. These actions will terminate any further liability on the part of Rhodes.

Participants and their parents will be required to agree to these terms with their signature on a form

presented to them by the Program Director or his/her designee.

Rhodes College Policy on the Protection of Minors

The College has established this Protection of Minors Policy to protect children who participate in programs and activities associated with the College or that are involved with non-College programs or activities on the College's campus. Rhodes College welcomes the presence of children in our campus community and is committed to ensuring the health, safety and wellbeing of all children (those under the age of 18). This policy also provides guidance for College faculty, staff and students, as well as non-College organizations or individuals who are involved in programs with minors on campus.

I. Scope

This policy applies broadly to interactions of College students, faculty, and staff with minors in College-affiliated programs and activities (including those hired temporarily to work in such programs), and non-College organizations or individuals that operate programs or activities involving minors on the College's campus. College programs with activities for children fall within the scope of this policy and currently include, but are not limited to, athletic camps and academic programs (such as the Rhodes Summer Writing Institute and the Mock Trial Academy).

College faculty and others on campus who only interact in classes or other normal academic settings with Rhodes undergraduates are not obligated to undergo the training or background checks required by this Policy. Anyone covered by this Policy who knows or suspects that a Rhodes undergraduate or high school student under the age of 18 has been abused or neglected must, however, make reports as required and outlined in Sections VIII and IX.

Minors visiting campus and staying in dorms as part of an official visit with the Office of Admission are not covered under this policy. The Office of Admission trains undergraduate student hosts in appropriate conduct with minors, and coordinates official visits, including visits by athletic recruits who are spending the night on campus.

II. Definitions

Abuse or Neglect of Minors¹ for the purposes of this policy means serious physical or emotional harm, sexual abuse, exploitation or imminent risk of serious harm of a person under the age of 18. Sexual abuse also means the commission of any act involving molestation, fondling or carnal knowledge of a child. Neglect includes the failure to make reasonable efforts to prevent the infliction of abuse upon a person under the age of 18.

Minor for the purpose of this policy is any person under the age of 18. Rhodes undergraduate students who are also under the age of 18 are treated similarly to other College students under this policy with regard to their interactions with minors in College-affiliated programs.

III. Guidance and Responsibilities

When participating in College-affiliated programs and activities, students, faculty and staff (including those hired temporarily to work in such programs) must

¹ More detailed definitions can be found in T.C.A. §37-5-103.

- always be vigilant in protecting the well-being and safety of minors with whom they interact on campus or elsewhere;
- review the informational material about the signs of abuse and neglect of minors in Appendix A or at this website: <https://www.childwelfare.gov/pubs/factsheets/whatiscan/> and Appendix C; and
- watch for signs of minor abuse or neglect and promptly report suspected instances of abuse or neglect, or violations of this policy or law (see Sections VIII and IX).

Before engaging in any College-affiliated program or activity involving contact with minors, students, faculty and staff (including those hired temporarily to work in such programs) must

- meet the requirements of this Policy relating to training (Section IV) and criminal background checks (Section V); and
- meet any additional requirements that relate to the specific program or activity.

Program Directors and supervisors of all College and non-College affiliated programs that involve minors must 1) register their program; 2) coordinate and certify appropriate training; and 3) coordinate and certify appropriate background checks. Specific information is found in Appendix B.

Non-College organizations and entities that operate programs or activities involving minors on campus must be aware of, and comply with this Policy.

To the extent that College faculty, staff or students are participating in programs or activities run by a non-College organization or entity off campus, they should familiarize themselves with, and follow, the policies of the organization relating to interactions with minors and understand their legal obligations with respect to working with minors in the program setting.

IV. Training

College students, faculty, and staff who participate in College-affiliated programs or activities involving minors (including those hired temporarily to work in such programs) must complete appropriate annual training and sign the certification form as outlined in Appendices B and C. Training is the responsibility of the director of each program. At a minimum, training must include

- basic warning signs of abuse or neglect of minors;
- guidelines for protecting minors from emotional and physical abuse and neglect; and
- requirements and procedures for reporting incidents of suspected abuse or neglect or improper conduct.

Training may be expanded depending upon the program or activity and the person's role in the program or activity.

Non-College organizations and entities that wish to operate programs or activities involving minors on campus must provide documentation to the College indicating that all individuals who will be interacting with minors (and anyone who supervises such individuals) have received training that meets or exceeds the minimum requirements of this section.

Specific requirements and procedures for training appear in Appendices B and C.

V. Criminal and Background Checks

Certain categories of individuals are required to clear a criminal background check prior to participation in College-affiliated activities involving minors, and it is the responsibility of the director of each program to ensure that these checks are completed before offering employment. Area county schools require FBI/TBI background checks with fingerprinting. The College honors the results of these background checks for personnel entering schools through its classes and programs, and does not require an additional background check by HR. The categories of individuals who must undergo background checks are listed in Appendices B and D.

If a College criminal background check reveals adverse information or unfavorable results, the College will conduct an individualized assessment using criteria designed to identify potential risk to minors. A prior conviction shall not automatically disqualify a person from participating in a program or activity.

Non-College organizations and entities that operate programs or activities on campus involving minors must conduct criminal background checks of their employees, volunteers, and representatives that meet College standards. The College may request any additional information it deems necessary to meet the requirements of this Policy. Rhodes requires such organizations to have a minimum of \$1,000,000 of liability insurance and a minimum of \$1,000,000 of sexual molestation insurance. Organizations that are unable to provide proof of the required insurance coverage will not be permitted to operate programs or activities on the Rhodes campus.

Specific requirements and procedures for background checks appear in Appendices B and D.

VI. Staffing and Supervision

An adequate ratio of staff to participants should be maintained at all times; particularly when in residence halls; Minimum required staffing ratios are as follows:

AGES	Staff-to-Camper Ratio for Overnight Programs	Staff-to-Camper Ratio for Day Programs
4-5	N/A	1:6
6-8	N/A	1:8
9-14	N/A	1:10
15-17	1:10	1:12

Acceptable procedures for releasing children from the program or activity should be followed (i.e. participants that are being picked up by a parent should be properly matched with the parent before the participant is released).

VII. Housing Guidelines for Overnight Programs

For College groups, participants will be housed such that all those in a dorm are either: 18 and older; or are under 18. The only adults (18 or over) allowed to stay in a dorm with participants who are under 18 are program employees who have had a background check and training as outlined in the Policy, OR participants who are rising Rhodes freshman. However, if a camp has other participants who are 18 or older, rising Rhodes freshmen that are also 18 or older would normally be housed with these other adults. Age will be determined as the age of the participant on the first day of the program, and all programs should ask for date of birth on participant applications. It is the responsibility of the Program Director to ensure that Office of Residence Life knows the ages of all participants for appropriate housing assignments. If possible, programs should employ Resident Assistants (RA) recommended by the Residence Life Office. If none of the recommended RA's is available to work the program, other Rhodes students may be considered for the RA positions.

Dorms are not appropriate family housing, and the College will not house family units (parents with their children) in dorms. The Office of Residence Life will work with each program to determine appropriate housing for participants and instructors. Visitors, other than parent/guardian and siblings, are discouraged. No overnight visitors are permitted.

The Program Director should collect and have readily available the following medical information for all participants:

- Emergency contact information
- Known medical conditions
- List of medications the participant is taking (Participants taking prescription medication must be able to self-administer their medication)
- Health insurance information

The Campus Safety Office should be made aware of the program and should be provided with the following information prior to the start of the program:

- Name of the program
- Contact persons and phone numbers
- Names of the residence halls where the participants will be staying overnight

VIII. Reporting

According to Tennessee state law, a report is required when a person knows or has reasonable cause to suspect that a child has been abused, neglected, or sexually abused. Failure to report is a Class A misdemeanor.

1. Emergencies

In case of an emergency, one should immediately call Campus Safety (901) 843-3880 or 911.

2. *Mandated Reporting*

Any person with knowledge of child abuse or neglect (Tenn. Code. Ann. §§ 37-1-403; 37-1-605) must report that knowledge to local law enforcement or law enforcement where the child resides and internally to the College Title IX Coordinator or Campus Safety Office. This reporting obligation applies to physicians, osteopaths, medical examiners, chiropractors, nurses, hospital personnel, other health or mental professionals; teachers, other school officials or personnel, daycare center workers, or other professional child care; foster care, residential or institutional workers, social workers, practitioners who rely solely on spiritual means for healing, judges or law enforcement officers; neighbors, relatives or friends, and other persons. Essentially anyone with knowledge of child abuse or neglect must report that knowledge (Tenn. Code Ann. §§ 37-1-403; 37-1-605).

Reports may be made to the Tennessee Child Abuse Hotline, 877 237 0004, to the Memphis Police Department, or the Rhodes College Campus Safety Office, 901-843-3880, or the College Title IX Coordinator, Tiffany Cox (coxt2@rhodes.edu; 901-843-3354 or by visiting 303 Southwestern Hall), or by filing a report at: <http://bit.ly/rhodesixreport> .. The Title IX Coordinator, with support from other appropriate offices as necessary, will help determine appropriate next steps.

In addition, one should promptly notify one's supervisor or the Program Director.

IX. Addressing Reports of Abuse or Neglect

A. Whenever the College receives a report of alleged abuse or neglect of a minor in a College affiliated program or activity:

1. The person receiving the report shall immediately notify the Title IX Coordinator (see contact information above).
2. The Title IX Coordinator, in consultation with the Campus Safety, the College Legal Counsel, and appropriate senior College leadership, shall:
 - a) Take immediate steps to prevent further harm to the alleged victim or other minors, including, where appropriate, removing the alleged abuser from the program or activity or limiting his or her contact with minors pending resolution of the matter.*
 - b) Determine whether Campus Safety, TN Department of Child Services, or both have already been notified and, if not, whether such notification is required or appropriate given the circumstances.*
 - c) If the parents or guardians of the alleged victim have not been notified and are not the alleged abusers, notify the parents or guardians of the minor involved.*
 - d) Investigate the report and resolve the matter in a way that safeguards minors, protects the interests of victims and reporters, affords fundamental fairness to the*

accused, and meets relevant legal requirements.

e) Facilitate the College's cooperation with any investigation conducted by Campus Safety, TN Department of Child Services, or other governmental agency.

B. Whenever a report alleges that someone involved in a non-College program or activity on campus who is not a member of the College faculty, staff or student body has abused or neglected a minor, the person receiving the report shall immediately notify the Title IX Coordinator. The Title IX Coordinator, in consultation with Campus Safety, the College Legal Counsel, and appropriate senior College leadership, shall coordinate with the non-College organization or entity as necessary to see that the requirements of Part A. 2 of this Section are accomplished.

X. Enforcement

Sanctions for violations of this policy will depend on the circumstances and the nature of the violation, but may include the full range of available College sanctions applicable to the individual including suspension, dismissal, termination, and, where appropriate, exclusion from campus. The College may also take necessary interim actions before determining whether a violation has occurred. The College may terminate relationships or take other appropriate actions against non-College entities that violate this Policy.

APPENDIX A: “What is Child Abuse and Neglect? Recognizing the Signs and Symptoms”
Child Welfare Information Gateway
<https://www.childwelfare.gov/pubPDFs/whatiscan.pdf>

APPENDIX B: For Program Directors and Supervisors

Rhodes College has adopted a “Protection of Minors Policy” to promote the wellbeing and safety of minors who participate in College-affiliated programs or activities and in programs and activities run by non-College organizations or individuals that operate programs or activities on the College’s campus.

Directors of programs or activities (“Program Directors”) of College and non-College Affiliated programs involving minors must

- 1) Register their program with the Finance Office;
- 2) Coordinate and certify appropriate training; and
- 3) Coordinate and certify appropriate background checks.

Some details regarding each of these responsibilities follow below. Further details can be found in associated appendices.

1. Register the program or activity involving minors

Program Directors must register their program with the Finance Office In order to register a program or activity involving minors, fill out the “Program or Activity with Minors Registration Form” appended at the end of this policy and send to the Finance Office The completed form **(which includes Program Director required training be completed – see below)** must be on file in the Finance office 14 days prior to the opening date of the program or activity, or in the case of **summer programs, by March 1 each year.**

2. Coordinate and certify training for individuals working with minors

Program Directors are responsible for providing training to those working in College and non-College programs or activities with minors as outlined below.

a. Program Director required training

Program Directors must complete free online training through United Educators, our insurer. There are two courses to complete (see below) with a total time of about an hour. Login at this address: <https://learn.ue.org/WJ2M5193586/RhodesProtectingChildren>. Complete the Registration form.

- a. Enter your first name, last name, and email address and click Register.
- b. You will receive a welcome email with your username and a temporary password.
- c. Follow the link in the email to sign on.
- d. You will be prompted to:
 - i. Enter your temporary password
 - ii. Create a new password

- iii. Create and answer a security question
 - e. Once you are logged in, be sure to complete all courses assigned to you. Program Directors must complete two training courses entitled “Hiring Staff Who Work with Minors” and “Identifying and Reporting Sexual Misconduct”, each will take about 30 minutes to complete.
 - f. A history of your completed courses is available in “My Completions.” You will also receive an email containing a link to your completion certificate, upon successful completion of the course.
- Note:** If you have any issues with sign-in or accessing the courses, or if you did not receive your welcome e-mail, visit the Support Portal at https://portalhelp.ue.org/sims/helpcenter/common/layout/SelfHelpHome.seam?inst_name=ue . Or click any Support Portal link on the site.

b. Supervisors and Individuals who stay overnight, or are regularly alone, with minors require training

Supervisors, and individuals who stay overnight, or are regularly alone, with minors must complete the **one** online training course entitled **Identifying and Reporting Sexual Misconduct** (same as the director) and it will take about 30 minutes to complete. Login at this address:

<https://learn.ue.org/WJ2M5193586/RhodesProtectingChildren>. Complete the Registration form.

- a. Enter your first name, last name, and email address and click Register.
- b. You will receive a welcome email with your username and a temporary password.
- c. Follow the link in the email to sign on.
- d. You will be prompted to:
 - i. Enter your temporary password
 - ii. Create a new password
 - iii. Create and answer a security question
- e. Once you are logged in, be sure to complete all courses assigned to you. Program staff must complete one training courses entitled “Identifying and Reporting Sexual Misconduct”, which will take about 30 minutes to complete.
- f. A history of your completed courses is available in “My Completions.” You will also receive an email containing a link to your completion certificate, upon successful completion of the course.

Note: If there are any issues with sign-in or accessing the courses, or if you did not receive your welcome e-mail, visit the Support Portal at https://portalhelp.ue.org/sims/helpcenter/common/layout/SelfHelpHome.seam?inst_name=ue . Or click any Support Portal link on the site.

c. Additional Required Training for All: Working with Minors Guidelines

All individuals working with minors in College affiliated programs or activities are required to

- review Appendix A (Mandated Reporter training): *What is Child Abuse and Neglect? Recognizing signs and symptoms*;
- review Appendix C: *Working with Minors Guidelines*; and
- sign the Certification contained in Appendix C.

Individuals required to read Appendix C are to submit the signed Certification to the Program Director or supervisor prior to the start date of any program or activity (Program Directors should set an appropriate deadline). In general, individuals who participate in programs or activities involving minors are required to review the Guidelines and sign the Certification at least annually for each program or discrete activity.

Appendices A and C provide helpful tips for maintaining a safe and positive environment when working with minors, advice on signs of child abuse and neglect, and steps to take if you suspect that a minor has been abused or neglected.

d. Supplemental Training

Program Directors are encouraged to supplement the College's training to meet the needs and specifics of their program.

3. Coordinate background checks for relevant individuals working with minors

Program Directors are responsible for coordinating criminal background checks of the following:

- program and activity directors and supervisors (consult with Human Resources, if you are unsure who needs a background check);
- those who stay overnight with minors; and
- those who regularly spend time with minors as part of their job responsibilities or role in a program involving minors.

More specific information on background check requirements and procedures can be found in Appendix D. A few specifics are given below. Area county schools require FBI/TBI background checks with fingerprinting. The College honors the results of these background checks for personnel entering schools through its classes and programs.

Background checks need to be done no more than 90 days before the start date of the program. To start the background check process, send the names and email addresses of potential hires to Lori von Bokel Amin (vbamin@rhodes.edu) or Leigh Powell (powell@rhodes.edu) in Human Resources, and they will initiate the entire process. This process, from submission to result, can take several days so please leave 2 weeks between the request and the date you need to certify the check (see 4 below), just to be sure. The Program Director will be informed if concerns are raised by the background check. Because a problem with a background check could impact your ability to hire a particular individual, you should have HR perform background checks as early as possible, but no more than 90 days before the start date of your program. HR will forward concerns raised about Program Directors to the Finance Office. FBI/TBI checks are performed by an external service.

Training and background check certification

Program Directors are responsible for certifying that all training and background check requirements are fulfilled by completing the "Program Employee Information" form and attaching all signed "Training Certification" forms (last page of Appendix C) for each employee, volunteer, and supervisor, and the online certifications for those necessary. This completed form and accompanying documentation is due at least 7 days prior to the start date of the program to the

Finance Office.

Non-College Programs Operating on the College Campus

Non-College organizations that wish to operate programs or activities involving minors on campus must comply with the College's Protection of Minors Policy, including requirements relating to reporting suspected abuse or neglect of minors, completing all relevant training and criminal background checks, and providing satisfactory evidence of liability insurance as noted in Section V of the [Rhodes College Policy on the Protection of Minors](#). Non-College organizations or entities must also register their program and submit to the Finance Office certification of compliance with the training requirements described herein *at least seven (7) days prior to the start of any program or activity involving minors on campus*.

College departments or units that would like to host non-College programs involving minors on campus ("Non-College Program Coordinators") must contact the Finance Office well in advance of the program's anticipated start date for further information about the procedures for ensuring that outside organizations meet these requirements.

APPENDIX C: Working with Minors Guidelines

Information for Those Working with Minors in College-Run or -Affiliated Programs or Activities

Rhodes welcomes the presence of children in our campus community and is committed to ensuring the health, safety and well-being of all children (those under the age of 18). To further this goal, this packet contains important information that individuals¹ must review if they are participating in programs or activities involving minors that 1) the College operates or 2) that others operate in College facilities.

You are receiving this information because you have been identified as participating in a program or activity with participants who are minors. You must review the information in this packet and return the attached certification indicating that you have read the packet and agree to comply with the requirements it describes. You must also determine whether you may be a mandated reporter and agree to comply with the obligations imposed by law and by the College on mandated reporters. You may also be required to review additional materials that are germane to your specific situation.

This informational packet contains the following:

- 1) Guidelines for working with minors that will help you to maintain safe and positive interactions and reduce the risk of mistaken allegations;
- 2) Steps to take if you suspect that a minor has been abused or neglected or is otherwise unsafe, including information about how to report your suspicions or ask questions;
- 3) Advice on the signs of child abuse and neglect from the US Department of Health and Human Services Administration for Children and Families; and
- 4) An acknowledgement form that you must sign to certify that you have read and understood the information and will comply with your obligations if you are a mandated reporter. This form must be turned into the director of the program or activity in which you are participating by the deadline set by the director of your program (and at least 7 days prior to the start date of the program).

Code of Conduct for Working with Minors

Those associated with programs or activities involving minors should observe the following "dos" and "don'ts" in order to maintain a safe and positive experience for program participants, encourage parental confidence, and avoid mistaken allegations.

DO

- Maintain the highest standards of personal behavior at all times when interacting with minors.
- Whenever possible, try to have another adult present if you are working with minors in an unsupervised setting.

¹ These requirements are applicable to Rhodes undergraduate students, including those under the age of 18, who participate in programs involving minors.

- Conduct necessary one-on-one interactions with minors in a public environment where you can be observed.
- Listen to and interact with minors and provide appropriate praise and positive reinforcement.
- Treat all minors in a group consistently and fairly, and with respect and dignity.
- Be friendly with minors within the context of the formal program or activity while maintaining appropriate boundaries.
- Maintain discipline and discourage inappropriate behavior by minors, consulting with your supervisors if you need help with misbehaving youth.
- Be aware of how your actions and intentions might be perceived and could be misinterpreted.
- Consult with other adult supervisors or colleagues when you feel uncertain about a situation.

DON'T

- Don't spend significant time alone with one minor away from the group or conduct private interactions with minors in enclosed spaces or behind closed doors.
- Don't engage in inappropriate touching or have any physical contact with a minor.
- Don't use inappropriate language, tell risqué jokes, or make sexually suggestive comments around minors, even if minors themselves are doing so.
- Don't give personal gifts to, or do special favors for, a minor or do things that may be seen as favoring one minor over others.
- Don't share information with minors about your private life or have informal or purely social contact with minors outside of program activities.
- Don't strike or hit a minor, or use corporal punishment or other punishment involving physical pain or discomfort.
- Don't relate to minors as if they were peers, conduct private correspondence or take on the role of "confidant" (outside of a professional counseling relationship).
- Don't "friend" minors on personal social media networks. If your Program has a Facebook page, Twitter account or uses other social media, be sure to use it for Program business only.
- Don't date or become romantically or sexually involved with a minor, either in person or virtually (no sexting).
- Don't show pornography to minors or involve minors in pornographic activities, either in person or virtually.
- Don't provide alcohol or drugs to minors or use them in the presence of minors.

**Reporting:
What to do if you suspect a minor has been abused or
neglected or is otherwise unsafe**

According to Tennessee State Law Citation: Tenn. Code Ann. §§ 37-1-403; 37-1-605, a report is required when a person knows or has reasonable cause to suspect that a child has been abused, neglected, or sexually abused. Failure to report is a Class A misdemeanor.

1. *Emergencies*

In case of an emergency, one should immediately call Campus Safety (901) 843-3880 or call 911.

2. *Mandated Reporting*

Any person with knowledge of child abuse or neglect (Tenn. Code. Ann. §§ 37-1-403; 37-1-605) must report that knowledge to local law enforcement or law enforcement where the child resides. This reporting obligation applies to physicians, osteopaths, medical examiners, chiropractors, nurses, hospital personnel, other health or mental professionals; teachers, other school officials or personnel, daycare center workers, or other professional child care; foster care, residential or institutional workers, social workers, practitioners who rely solely on spiritual means for healing, judges or law enforcement officers; neighbors, relatives or friends, and other persons. Essentially anyone with knowledge of child abuse or neglect must report that knowledge (Tenn. Code Ann. §§ 37-1-403; 37-1-605).

3. Reports may be made to the Tennessee Child Abuse Hotline, 877 237 0004, to the Memphis Police Department, or the Rhodes College Campus Safety Office, 901-843-3880, or the College Title IX Coordinator, Tiffany Cox (coxt2@rhodes.edu; 901-843-3354). The Title IX Coordinator, with support from other appropriate offices as necessary, will help determine appropriate next steps.

4. *Internal Reports of Known or Suspected Abuse or Neglect of Minors*

Anyone participating in a College-affiliated program or activity involving minors or a non-College program or activity operating on campus involving minors who knows, suspects, or receives information indicating that a minor has been abused or neglected, or who has other concerns about the safety of minors MUST inform the College Title IX Coordinator Tiffany Cox 901-843-3354 or visiting 303 Southwestern Hall, by emailing coxt2@rhodes.edu, or by filing a report at: <http://bit.ly/rhodestixreport> .

5. In addition, one should promptly notify one's supervisor or the Program Director.

Training Certification

I hereby certify that I have read and understand the foregoing *Information for Those Working with Minors in College-Run or -Affiliated Programs*, and will comply with all reporting and other obligations for mandated reporters under Tennessee law. I have had an opportunity to raise any questions I have about this information and have done so if necessary.

Signature

Date

Printed Name

Program/Activity in which you are participating:

APPENDIX D: Criminal Background Checks for Those Interacting with Minors

The following categories of adults are required to undergo a criminal background check prior to their participation in College activities or programs involving minors:

- Directors and supervisors of programs involving minors, including those who are responsible for supervising those who interact with minors;
- Those who stay overnight with minors as part of their job responsibilities in a program or activity involving minors; and
- Those who regularly spend time with minors as part of their job responsibilities or role in a program involving minors.

More guidance on which employees need background checks, see the **Guidance** at the end of this appendix.

Background checks for College employees and students who participate in College-affiliated programs or activities involving minors must be renewed every four (4) years¹. Any employee or student who is required by this Policy to have a background check is under a continuing obligation, as long as he/she continues to participate in programs or activities involving minors, to disclose immediately any new felony or misdemeanor conviction to the Human Resource Office. Employees who have a break in service of more than six (6) months², and students who withdraw, are suspended or dismissed, or who take leaves of absence of more than six (6) months, will be required to undergo a new background check if they reengage in College programs or activities involving minors and would otherwise be required to undergo a background check pursuant to this policy.

Individuals who are required to have a background check under this Policy who are not College employees or students (whether involved in a College program or activity or one operated by a non-College entity) must renew the background check annually to continue participation.

Human Resources (HR) will oversee the processing of criminal background checks and maintain all records relating to these checks for at least 10 years, except in the case of FBI/TBI background checks with fingerprinting. Details on the mechanics of getting background checks done through HR can be found in Appendix B.

For College-affiliated programs or activities, only a background check conducted by the College or an external source approved by the College (such as FBI/TBI check with fingerprinting) will be accepted for purposes of this policy. Background checks, at a minimum, shall consist of a social security number trace, address locator for seven years, a search of federal and state or 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 as determined solely by the College, an individualized assessment will be conducted by HR and the Finance Office,

¹ For employees who were required to have a background check completed as a condition of employment with the College, the four (4) year period for purposes of the Protection of Minors policy will be calculated from the date the background check for purposes of employment was completed.

² A break in service for employees generally excludes approved leaves of absence.

taking into account the following:

- the nature of the finding;
- the job for which the applicant is being considered;
- the underlying event(s) that occurred;
- the time elapsed since the event(s) occurred;
- the applicant's employment history and other evidence of his or her activities in the intervening time since the event(s) occurred; and
- other relevant information.

A prior conviction shall not automatically disqualify an applicant from a program or activity, but shall be considered using the criteria identified above.

Non-College Programs Operating on the College Campus

Non-College organizations and entities that operate programs or activities involving minors on campus must conduct criminal background checks of their employees, volunteers, and representatives that meet College standards. If any background check conducted by a non-College program returns a conviction or other adverse information, the external program must inform their College contact person in writing. The College may, in its sole discretion, exclude any external program employee, volunteer, or representative who does not successfully pass a background check.

Certification of compliance with the background check rules described herein, including that they have conducted background checks as set forth in this Policy and that they have disclosed all convictions revealed by background checks, is required prior to the start of any program or activity involving minors on campus. The College may request any additional information it deems necessary to meet the requirements of this Policy.

Guidance: Background Check Requirements Student workers

Student workers are all "current and incoming College undergraduate students" and thus include rising accepted and deposited freshmen and accepted and deposited transfer students. HR has a separate form for hiring "Current and Incoming College undergraduate students."

- Employees in the Student Worker category WILL be subject to background checks
 - IF
 - they are 18 years or older;
 - AND a OR b:
 - a. they "**regularly** spend time with minors as part of their job responsibilities or role in a program involving minors". Directors will need to determine if an employee, volunteer or student regularly spends time with minors.
 - b. they "stay overnight with minors as part of their job responsibilities in a program or activity involving minors".

All other employees

All new employees in temp and staff positions have a background check performed before they are hired. This includes temp employees and staff who have already been in the employ of the College at any point in the past, regardless of the length of time of any break in service. Current policy is for all such tests and checks to be charged to the department or program that is doing the hiring.

- This policy applies to all employees of your programs that you are hiring each year EXCEPT
 - those who are "Current and Incoming College undergraduate students" who have NOT
 - withdrawn from the College;
 - been suspended or dismissed; or
 - taken a leave of absence for more than 6 months.
- Employees in your program will be subject to a new background check only every 4 years IF a AND b are true, AND IF they need a background check because of c OR d:
 - a. they are already in the employ of the College; and
 - b. they have not had a break in service of more than 6 months (excluding approved leaves of absence);
 - c. they "**regularly** spend time with minors as part of their job responsibilities or role in a program involving minors". Directors will need to determine if an employee, volunteer or student regularly spends time with minors; or
 - d. they "stay overnight with minors as part of their job responsibilities in a program or activity involving minors".

You are responsible for making sure your employees who are also in the employ of the College have had a background check in the past 4 years IF they are in the category that need a background check (either c or d above are true). Some employees may have been hired before the College started doing background checks. Check with HR to confirm an up-to-date background check (again, only on those for whom it is necessary).

Other Individuals

Individuals who are required to have a background check under this Policy who are not College employees or students (whether involved in a College program or activity or one operated by a non-College entity) must renew the background check annually to continue participation.

APPENDIX E: External Programs Operating on College Campus

Non-College organizations and entities that wish to operate programs or activities involving minors on campus must comply with the College's Protection of Minors Policy, including requirements relating to reporting suspected abuse or neglect of minors, completing all relevant training, and criminal background checks, and providing satisfactory evidence of liability insurance as noted in Section V of the Rhodes College Policy on the Protection of Minors. Non-College organizations or entities must also register their program and submit to the Finance Office certification of compliance with the training requirements described herein *at least seven (7) days prior to the start of any program or activity involving minors on campus*.

These organizations must conduct criminal background checks of their employees, volunteers, and representatives that meet College standards. If any background check conducted by a non-College program returns a conviction or other adverse information, the external program must inform their College contact person in writing. The College may, in its sole discretion, exclude any external program employee, volunteer, or representative who does not successfully pass a background check.

Certification of compliance with the background check rules described herein, including that they have conducted background checks as set forth in this Policy and that they have disclosed all convictions revealed by background checks, is required prior to the start of any program or activity involving minors on campus. The College may request any additional information it deems necessary to meet the requirements of this Policy.

College departments or units that would like to host non-College programs involving minors on campus ("External Program Coordinators") must contact the Finance Office well in advance of the program's anticipated start date for further information about the procedures for ensuring that outside organizations meet these requirements.

APPENDIX F: Forms

REGISTRATION FORM

PROGRAM or ACTIVITY with MINORS

This registration form must be completed and on file with the College (send to the Finance Office).

The Program Director must complete their own training (see Appendix B-2a) before the this form is turned in – and at least 14 days prior to the beginning of the program, except in the case of **summer programs, for which the deadline is March 1** each year.

Program Name: _____

Program Dates: _____

Program Director Information

Name: _____

Email: _____

Phone: _____

Online training certification attached: _____

Date of most recent background check for Program Director: _____

Source of background check (College HR or other, if other, specify): _____

Approximate number of minors participating: _____

Program Description:

For Office Use Only:

Date completed form submitted:

Program Director annual online training certification attached:

SUMMER RESIDENTIAL PROGRAMS AT RHODES COLLEGE STATEMENT OF RESPONSIBILITY

The undersigned is a student accepted into a residential summer program at Rhodes College (hereinafter referred to as "program") and the student's parent. The undersigned agrees to the obligations and considerations set forth herein. Reference in these conditions to Rhodes College (hereinafter referred to as "Rhodes") shall include all its officers, trustees, employees, agents and related parties, individually and collectively. Reference in the conditions to "participants" shall include all students who have been accepted into the program. All reference herein to "the parents" of the participants shall include the legal guardians or other adults responsible for the applicant.

- Behavioral Responsibilities:

All participants will at all times comply with rules, standards, and instructions for student behavior set forth in the Rhodes Student Handbook and the summer camp policies and guidelines. Rhodes reserves the right to enforce appropriate standards of conduct and specifically reserves the right to terminate participation in the program by anyone who fails to maintain these standards or for any action or conduct that Rhodes considers to be incompatible with the interests, harmony, comfort, and welfare of other participants. It is important that participants conduct themselves in an entirely honorable manner during their association with this program, and avoid any act that might reasonably be construed as lying, cheating, or stealing.

- Release of Liability:

The undersigned, in consideration for being permitted to participate in the program, for himself, his heirs and his personal representatives, hereby forever releases and discharges the College, its trustees, officers, faculty, staff, employees and agents (Released Parties), from any and all liability arising out of the undersigned's participation in the program, including, without limitation, liability for any claims or causes of action whatsoever arising out of any damage, loss, or injury (including death), to the participant or to property owned by or in the custody of the participant while engaged in the program.

- Academic Responsibility:

For the satisfactory completion of the course and/or the awarding of academic credit (in relevant programs only), participants are expected to attend all lectures and seminars and to complete all assignments in a timely way.

- Photos:

Participants consent to the use of their photographs, comments, and photographic likenesses by Rhodes for publicity purposes insofar as Rhodes may in its discretion think fit.

- Health and Safety:

All participants shall assume responsibility for medical treatment and the cost of such treatment while in the program.

Rhodes reserves the right to take whatever action it may consider warranted by circumstances relating to the health and safety of the participants, and the undersigned hereby releases Rhodes from any liability for

such decisions or actions. The participant hereby authorizes Rhodes and its agents and employees at their discretion without obtaining any further consent to arrange such medical services and treatment as may be deemed necessary for the participants at the sole risk and expense of the participants or their parents.

Parents will be contacted to pick up their child if any of the following obtain:

1. Illness that prevents a participant from taking part in activities for more than 24 hours.
2. Illness that results in greater need for care than we can provide.
3. Fever (above 100°F under the arm, above 101°F in the mouth, above 102°F in the ear) accompanied by other symptoms.
4. Diarrhea – two or more cases of loose stool.
5. Vomiting – incidents over two days.

Procedures in such cases of medical emergencies:

1. Determine if it the emergency is life-threatening. Contact Campus Safety.
2. In cases that are life-threatening, contact emergency medical services first (911).
3. Contact the parents at the emergency contact numbers provided.

▪ Substance Abuse Policy:

The sale, distribution, use or possession of a controlled drug or substance, or unauthorized prescription while a participant on this program represents a serious breach of conduct and will result in expulsion from the program and notification of the appropriate officials of the parent institution and/or others who may be concerned. Also, to be present, though not a participant, during a violation of this policy will in itself be deemed reprehensible and subject to penalty.

▪ Weapons Policy:

Rhodes College strictly prohibits possession of weapons of any type by students, employees or visitors on all College property, including but not limited to firearms, B-B guns, pellet guns, bows and arrows, hunting knives, explosives or any other object that could be used as a deadly weapon. (Weapons are defined in the Tennessee Code Annotated). Violators (including those individuals with valid Tennessee gun carry permits) are subject to suspension, expulsion, termination, or any combination of appropriate sanctions.

Any violation of this policy should be reported immediately to Campus Safety at 843-3880. Prohibition of such weapons extends to the property and/or vehicles controlled by an individual while on College property. Questions regarding this policy should be directed to the Director of Campus Safety or Director of Human Resources.

Room Searches and Safety Inspections

The Director of the program or the Director's designee, in consultation with the Director of Campus Safety and/or Director of Residence Life, may authorize a search of a student's premise if there is reasonable cause to believe that a violation of college policy is occurring or has occurred.

Authorized personnel of Rhodes have the right to enter student rooms at any time for purposes of maintenance and repair, inspection of health and safety conditions, and investigation of violation of College regulations. Resident Assistants conduct routine checks of battery-powered room smoke detectors.

▪ Indemnity:

The participant, in consideration for being permitted to participate in the program, both on campus and off campus, further agrees to assume the liability for, and indemnify and defend Rhodes from, any and all claims or damages for any sickness, personal injury, death, property damage or any other loss that may arise, either wholly or in part, out of any negligent, intentional or other act or omission by the participant in connection with the program, both on campus and off campus, including those claims or damages that may arise out of the joint or concurrent negligence of a third party, the Released Parties, or any of them.

▪ Cancellation Policy:

In the event of cancellation of an entire session of this program before commencement of the program, all monies paid to Rhodes prior to that time will be refunded. These actions will terminate any further liability on the part of Rhodes.

The undersigned acknowledges that he/she has read the above statement and agrees to the conditions set forth above and to the conditions set forth in the camp policies and guidelines.

Parent Name Date

Student Participant Name Date

Parent Signature Date

Student Participant Signature Date

PROTECTION OF MINORS

PROGRAM EMPLOYEE INFORMATION

Program: _____ Start Date: _____ Date turned in: _____

Fill out table below. Add extra pages as necessary. Supply the names of all employees and staff (including Program Director and supervisors) for your program. This completed form is due to the Finance Office **7 days** prior to the start date of your program. **Also attach all signed training certifications – the last page of Appendix C, and the online certification form. Reproductions are OK.**

Name	Required background check required (Y/N)	Certify required background check completed (Y/N)	List Necessary Training ¹	Verify Training is Completed ²

¹ Specify necessary training as Appendices A & C only; Appendices A & C and online training ***Hiring Staff Who Work with Minors*** and ***Identifying and Reporting Sexual Misconduct***

² Attach copies of signed Appendix C certifications for all employees and staff, and printed certifications for all necessary online training