

Policy on Programs Involving Minors

GOVERNANCE AND LEGAL

Effective Date:
September 2, 2014

Date Revised: July
27, 2020

Supersedes:

Related Policies:
Policy on Background Checks and Credential Verifications
Policy on Background Checks for Contractors and Vendors

Responsible Office/Department:
Risk Services

Keywords: Minors; high school students; children; sports camps; pre-college programs; young scholars; youth programs; CORI; SORI; background check; criminal records check

I. Purpose and Scope

Northeastern University is committed to promoting the safety and well-being of minors who engage with our campus communities through participation in -university- sponsored - programs and activities on and off campus (and in some cases virtually), as well as those who participate in programs and activities that are sponsored by non-university organizations that are authorized by Northeastern to use university facilities for their activities. The university expects that all members of the community, not only those involved in programs for minors that come within this policy, will adhere to the general standards and Code of Conduct that underlie this policy for interacting with minors and also will report any good faith suspicions of child abuse, neglect, or exploitation to the Northeastern University Police Department and/or other appropriate agency.

This policy applies to university-sponsored activities and programs, including internships, in which minors participate, on- or off-campus, including programs hosted electronically, telephonically or virtually, to university-sponsored programs run by recognized student organizations, mentorship programs and authorized programs that take place on university property or facilities that are operated or sponsored by third parties.

This policy provides program registration, training, reporting, background screening and other requirements relevant to the protection of minors and others participating in such activities.

Exclusions: This policy does not apply to:

1. minors who are enrolled Northeastern students, and come within the university's Student Code of Conduct;
2. minors employed by the university, who are covered by university policies promoting a safe and healthy workplace. This exemption does not include minors' participation in internships, whether paid or unpaid. Such internships are subject to this policy and registration with Risk Services
3. the Russell J. Call Children's Center, which is licensed and regulated as a daycare center under state law;
4. participation by minors in a research protocol approved by the Institutional Review Board;
5. community service activities such as tutoring or mentoring sponsored by recognized nonprofit or community service organizations (such as Big Brother/Big Sister) in which Northeastern students participate, *provided that* if the organization proposes to use university facilities for such community service activities, the organization is responsible for compliance with this policy.
6. minors who are not participating in a Program but who may be in attendance at a public performance or event or who may be visiting as the child of a parent, guardian, employee, student or agent.

II. Definitions

For the purposes of this policy:

Minor is anyone under the age of eighteen.

Responsible Adults are those persons eighteen years of age or over or registered as a university student who are responsible to supervise, manage, chaperone, direct, coach, teach, tutor, or otherwise interact directly with minors in connection with a Program, as defined below, whether they are faculty, staff, students, interns, volunteers, employees or contractors of the university or a Third-Party Sponsor of a Program.

Program refers to any organized activity sponsored, offered, or otherwise facilitated

by any authorized university member or Third-Party Sponsor, as defined by this policy, which is intended for the enrollment and participation of minors, but does not include Admissions tours and hosted overnights, or athletic events, performances, and other presentations that are open to the general public which minors might attend at the discretion of their parents or guardians.

University Program Sponsor is the college, department, organization, or other unit of the university sponsoring, hosting, authorizing or otherwise operating a Program, or authorizing the use of university facilities for operation of a Program by a non-university entity.

Third Party Sponsor refers to a non-university entity hosting, organizing, or operating a program in university facilities or on university property.

Criminal Background Check refers to a review of a person's criminal record history (the Massachusetts Criminal Offender Record Information, known as CORI, or CORI-equivalent in any jurisdiction where a person has lived in the last seven years), and includes a search of the Sex Offender registry Information (SORI, or SORI-equivalent).

Required Training is instruction required of all Responsible Adults prior to their working with minors in any Program covered by this policy, and annually thereafter as long as the Responsible Adult continues to take part in a Program, as provided for in Section III, c. 3 of this policy.

III. Policy

To promote the safety of minors participating in activities at or sponsored by Northeastern University, all Programs must meet the following requirements, in addition to any applicable federal, state, or local law, and university policies.

A. Registration

Programs must be registered with Risk Services under timelines proscribed by Risk Services to meet the requirements and purpose of this Policy. Risk Services is responsible for administering the registration of Programs and any related requirements and procedures. Risk Services will develop and publish [guidelines for the registration of Programs](#).

Any requests for clarification as to whether a particular Program is covered by this Policy or any of the provisions of this Policy must be sent to Risk Services.

Programs that fail to meet registration requirements may be canceled or delayed at the discretion of Risk Services until the requirements under this policy are met.

B. Criminal Background Checks and Training

Responsible Adults who work with minors are required to have criminal background checks, consistent with applicable federal, state and local laws and to complete the Self Disclosure form on an annual basis. Accordingly, prior to beginning any task in a Program that involves contact with minors, Responsible Adults are required to

1. complete a: [Self-Disclosure Form](#)
2. complete a criminal background check as required by applicable jurisdictions; and
3. participate in Required Training, which can include on-line or live training that satisfies the requirements for mandated reporters under Massachusetts G.L. c. 119, § 51A and/or other applicable federal, state or local requirements.

C. Written Agreement(s)

For all minors enrolling or participating in a University Sponsored Program, the parent/guardian must execute a University Participation Agreement/waiver.

[University Participation Agreement and Release](#)

An authorized signatory of each Third Party Sponsor must complete a Conference Services or Facilities Use Agreement when using university facilities and must complete a Third Party Form indicating:

- a. that the Third Party Sponsor understands and accepts responsibility for adhering to this Policy and the attached Guidelines, including by requiring voluntary self-disclosure forms, Required Training, and criminal history/background checks of all Responsible Adults in its Program(s);
- b. that in addition to the standard certificate of insurance required of external organizations using campus facilities, the Third Party Sponsor shall obtain additional endorsement(s) appropriate to activities involving minors; and
- c. A provision acknowledging the Third Party Sponsor's obligation to prepare the written plans and procedures required in the registration form and to make those available for review by the university upon request.

D. Reporting Allegation(s) of Inappropriate Behavior

The University expects that every member of the university community will immediately report to Northeastern University Police Department if he or she knows or has a good faith belief that a child has been abused, neglected or exploited. This includes not just information or suspicions of on-campus conduct, but also suspected abuse or neglect by a parent, guardian, or custodian/caretaker. Under this Policy, every Responsible Adult is required to report immediately to Northeastern University Police Department if he or she has reasonable cause to believe that a child is suffering physical or emotional injury resulting from abuse, neglect -- including malnutrition -- or exploitation. Northeastern University Police Department is the university's designated agent to receive such reports when required under M.G.L. c. 119, §51A, and similar applicable laws in other jurisdictions and will assist in making required oral and written reports to the appropriate agency.

Anyone making a nonfrivolous report in good faith is protected under state law from criminal and civil liability for making the report. Further, the university will not tolerate retaliation or discrimination against anyone making a good faith report to protect the welfare of a minor.

IV. Additional Information

The university expects all members of the university community to adhere to and act in accordance with this Policy. Failure to comply may lead to disciplinary action up to termination, and/or revocation of the opportunity to access or use university facilities. Likewise, failure by a Third Party Sponsor to adhere to the Policy shall constitute a breach of the Conference or Facilities Use Agreement and will result in termination of the organization's ability to access or use university facilities.

The university reserves the right to restrict, deny, or place conditions on activities or programs that host minors on university property or by using university network resources or online platforms. The university reserves these same rights with respect to its authority to limit minors' access to university facilities and to require any minor to leave the campus or any virtual or electronic meeting if the minor does not comply with university rules and procedures.

V. Contact Information

Report suspicions of child abuse, neglect, or exploitation to the Northeastern University Police Department by calling 617-373-2121.

If you believe that a child is in imminent danger :

On the Boston campus- you should immediately contact NUPD's emergency line at 617-373-3333

At locations outside of the Boston campus- contact 911 or local police emergency line.

If you have questions about the registration process, contact Risk Services, 617-373-7167, minorsprograms@northeastern.edu, <https://www.northeastern.edu/risk-services/>.