NOVA | Northern Virginia Community College

Sponsored Programs Involving Minors

Policy Procedure: Sponsored Programs Involving Minors

Procedure Number: 117P

Contact Information: ORM@nvcc.edu

Forms: Assumption of Risk, Image Release Form, Programs Involving Minors – Approval and Registration, Incident Report Form, Guidelines for Working with Minors

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1. Purpose

The purpose of this procedure is to facilitate Programs involving unenrolled Minors in a safe and compliant manner. This includes obtaining necessary approvals, ensuring proper registration, and adhering to all relevant guidelines and policies to protect the well-being of Minors participating in College Sponsored Programs.

2. Definitions

Background Check: a mandatory process to review an employee's criminal history to determine their suitability for participation in College Sponsored Programs involving Minors.

College Property: all buildings, facilities, and other property owned or controlled by the College, including but not limited to classrooms, administrative buildings, parking lots, athletics fields and facilities, and vehicles.

College Sponsored Program: a Program that is directly related to the assigned responsibilities of the College department or division sponsoring the Program, and for which a department or division of the College determines the content of the Program, plans and organizes the logistics.

Incident Report: used to document accidents or injuries involving students, visitors, or contractors on campus and must be submitted to the Office of Risk Management.

Minor: an individual under the age of 18 who is not currently enrolled in any credit, non-credit, and dual enrollment courses at the College.

Program Involving Minors (Program): an event or activity that provides educational/instructional, recreational, cultural, or athletic activities primarily developed to serve Minors, such as camps, STEM Day, etc.

Program Staff: employees who have been cleared by HR to participate in the College Sponsored Program and who interact with, supervise, chaperone, instruct, oversee, or otherwise have responsibilities interacting with Minors.

Program Sponsor: a college employee responsible for initiating, coordinating, and ensuring compliance with all procedural, safety, and documentation requirements for a Program Involving Minors.

3. Procedure

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Seeking Program Approval

1. All Programs Involving Minors must be submitted for review and receive approval from the sponsoring Provost or Vice President, the Provost of the Program location (if different from the sponsor), and the Vice President of Finance and Administration as the Risk Manager for College. The 125-392 Programs Involving Minors- Approval and Registration form and list of all Program Staff must be submitted to ORM at least sixty (60) days before the first scheduled date of participation by Minors.
2. A request for Program approval must include:
    a. A 125-392 Programs Involving Minors - Approval and Registration form which includes:
        i. Program Sponsor name and title
        ii. Program itinerary and description
        iii. Location and responsible Provost approval
        iv. Anticipated number of participants and age range
        v. Justification of alignment with the College Mission
        vi. Approval by Provost/VP
    b. A list of all Program Staff that will interact with Minors during the Program (See Section d: Background Checks)
3. All request forms must be submitted to the Office of Risk Management (ORM@nvcc.edu) for review and final approval by the VP of Finance and Administration

Registration of Participants

1. Registration must not open until after the 125-392 Programs Involving Minors form has been submitted and approved as required under subsection (a).
2. Minors and their parents or guardians must submit completed required College forms before Minors are allowed to participate in a College Sponsored Program, including:
    a. Assumption of Risk Form [125-152] signed by the participant, parent, or legal guardian.
    b. Image Release Form
3. For Programs that are co-sponsored by an external organization, that organization's forms may be substituted for the College forms. However, the College Assumption of Risk form is always required, even if the external organization's form covers risk.
4. All completed Assumption of Risk forms must be provided to the Office of Risk Management (ORM) for document retention purposes at least five business days prior to the start of the Program.

College Employee Responsibilities

1. Program Sponsor
    a. Submit the 125-392 Programs Involving Minors- Approval and Registration form to the Office of Risk Management (ORM@nvcc.edu) at least 60 days prior to the Program start date
    b. Compile and submit names and EMPLID's for all employees who will be working with Minors to the Office of Risk Management (ORM@nvcc.edu)
        i. The list must be submitted with the 125-392 form
        ii. The list may be updated to include additional employees; however, any revisions must be submitted to the Office of Risk Management no later than 10 days before the Program start date
    c. Ensure that all participants have a completed Assumption of Risk form
    d. Issue the Program rules and behavioral expectations to participants prior to the start of the Program
    e. Compile, maintain, and distribute to Program Staff a list of all emergency contacts and disclosed allergies for participants
2. Program Staff
    a. Always supervising Minors while they are participating in the Program, including during off-site activities

and while outside organizations are leading activities.
   b. Following College Guidelines for Working with Minors
   c. Enforcing all Program rules and behavioral expectations
   d. Responding to emergencies
   e. Completing Incident Reports, if required
   f. Reporting child abuse or neglect as outlined in Reporting Child Abuse and Neglect Policy
3. Sponsoring Provost or Vice President
   a. Review the 125-392 Programs Involving Minors- Approval and Registration ensuring that all information is complete and accurate.
   b. Verify that the Program is sufficiently aligned with the College Mission.
4. Provost- Program Location (if different than sponsor)
   a. If the Program is hosted on a campus other than that of the sponsoring Provost, the Provost of the host campus must review and sign the 125-392 Programs Involving Minors – Approval and Registration form.
   b. Ensure that the proposed time and location are appropriate and will not interfere with other scheduled campus activities.
5. Risk Management Staff
   a. Review all submitted 125-392 requests and submit to the VP of Finance and Administration for final approval
      i. Once approved, submit the form to the Virginia Department of Risk Management and College Police
      ii. Provide a copy of the approved form to the Program Sponsor
   b. Provide the list of Program Staff to HR to coordinate and confirm Background Checks are completed (or in-date if within 18 months) for all Program Staff
   c. Maintain a copy of all completed Assumption of Risk forms from all participants.
6. VP Finance and Administration
   a. Review the 125-392 Programs Involving Minors- Approval and Registration form ensuring that all information is complete and accurate
   b. Verify that the risks of the Program are outweighed by the benefits to the College and community.
   c. Approve or deny the Program via the 125-392 form completion.

Background Checks

1. Employees participating in the Program and interacting with Minors must successfully complete a criminal Background Check every 18 months. These checks are coordinated through the Office of Human Resources (HR).
2. An initial list of identified Program Staff must be included with the 125-392 Programs Involving Minors- Approval and Registration form submitted under subsection (a).
3. ORM will forward the staff listed in the form to HR to initiate Background Checks once the form is approved by the VP of Finance and Administration.
4. HR reviews the records to determine which employees have not completed a Background Check within the past 18 months. Those requiring a new check will be required to complete the necessary documentation at least 10 days prior to the scheduled start date of the Program.
5. Once all Background Checks are finalized, HR will confirm with ORM and the Program Sponsor the staff who are cleared to participate.
6. Employees with unsatisfactory Background Check results will be disqualified from participating in the Program at HR's discretion.
7. Any updates to the Program Staff that require additional Background Checks must be submitted to ORM at least 10 days prior to the Program's start date to ensure proper coordination with HR.

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Violations and Reporting

1. College employees who are designated to supervise Minors during College Sponsored Programs or activities must fulfill their supervisory responsibilities as required. Failure to do so may result in disciplinary action in accordance with DHRM and VCCS policies. Additionally, College departments that do not fully comply with this policy may be restricted from sponsoring future Programs involving Minors.
2. Accidents involving visitors, including Minors, should be reported immediately to ORM. The College employee at the scene must complete the Incident Report Form, (Form 125-088), at the time of the occurrence or as soon after the occurrence as possible. College police are to complete the form if no College employee is present.
3. If a Minor discloses any type of abuse or neglect (at any time previously or during the Sponsored Program) to an employee, or if an employee has reason to suspect that the participant has been subject to abuse or neglect, the employee, as a mandated reporter, must report the abuse or neglect to the Child Abuse & Neglect Hotline at 1-800-552-7096, and report to the Program Sponsor and College Police. Failure to report may expose the employee to criminal sanctions under 63.2-1509 of the Code of Virginia and be grounds for discipline under College policies.
4. If an allegation of abuse or neglect is made against Program Staff or another employee, the employee will be removed from any further participation in the Program until such allegations have been satisfactorily resolved.