

AZUSA PACIFIC UNIVERSITY
POLICIES AND PROCEDURES

Title: Programs with Minors Policy
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Replacing Policy Number: No Prior Policy
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Issuing Authority: Office of the President
Responsible Office: Office of the General Counsel

Reason for the Policy

Azusa Pacific University (“APU” or “University”) is committed to the safety and protection of minors. The purpose of this policy is to provide for appropriate supervision of minors who are involved in University-sponsored programs, programs held at the University, and programs housed in University facilities at all geographic locations. This includes programs operating outside of the United States, including Mexico Outreach. However, this policy does not apply to general public events where parents or guardians are invited and expected to provide the supervision of minors; to events where parents or guardians are explicitly required to accompany their children; or to events, such as “Night of Champions,” where thousands of junior and senior high school students are accompanied onto the premises by group leaders, or by parents or legal guardians for a group event, which may not be overseen by Authorized Adults as defined by this policy. This policy applies to all faculty, staff, volunteers, and students representing the University who interact with minors in a direct or unsupervised capacity. It also applies to independent contractors, employees, and volunteers from external groups that interact with minors in a direct or unsupervised capacity in University facilities or on University premises.

This policy does not apply to enrolled APU undergraduate students who are minors, except in the following circumstances:

- (i) Where signature of a parent or legal guardian is required for liability releases, waivers, contracts, and other applicable documents
- (ii) Where a consent for medical treatment is required
- (iii) For legally mandated reporting of abuse or neglect

This policy does not apply to activities that individuals undertake in their private capacities, unrelated to the University.

All those who work with minors must be particularly aware that they are responsible for maintaining appropriate physical, emotional, and sexual boundaries. Sexual behaviors, including seductive speech, gestures, photographs or pictures of a sexual nature, or physical contact that exploits, abuses, or harasses, must be avoided at all times.

This policy addresses appropriate supervision, conduct, and reporting requirements for all who interact with minors.

Definitions

Minor: While the definition of a “minor” may vary from state to state and from country to country, for purposes of this policy a “minor” is defined as a person under the age of eighteen (18). This policy does not apply to enrolled APU students who are minors, except in the following circumstances:

- (i) Where signature of a parent or legal guardian is required for liability releases, waivers, contracts, and other applicable documents
- (ii) Where a consent for medical treatment is required
- (iii) For legally mandated reporting of abuse or neglect.

University Facilities: Facilities owned by or under the control of, the University, with the exception of facilities leased to the public

Program: Programs and activities offered by various units of the University, including but not limited to academics, student life, administrative and athletic units, or by non-University groups or entities using University facilities. This includes but is not limited to workshops, sports camps, academic camps, conferences, pre-enrollment visits, and similar activities.

Sponsoring Unit: The unit of the University which offers a program or gives approval for housing or use of the University’s facilities. All programs for minors must have a sponsoring unit, and the sponsoring unit will be responsible for ensuring that the program meets the criteria set forth in this policy.

Authorized Adult: Individuals, age eighteen (18) and older, paid or unpaid, who interact with, supervise, chaperone, or otherwise oversee minors in program activities and recreational or residential facilities, where such program activities and recreational or residential facilities are under the University’s supervision and control. This includes but is not limited to faculty, staff, volunteers, graduate and undergraduate students, interns, employees of temporary employment agencies, independent contractors, and consultants. The Authorized Adults’ roles may include but are not limited to positions as counselors, chaperones, coaches, instructors, and team leaders. Authorized Adults are considered mandated reporters under applicable laws and University policy.

Adults who are engaged to render their services as employees, independent contractors, volunteers, or in any other capacity for programs that are permitted to use University facilities or premises, but are not a University-sponsored program or controlled program and adults who are foreign nationals who are engaged by third parties to accompany minors from outside the United States to engage in University programs are not Authorized Adults as defined by this policy. However, it is the responsibility of such programs to provide adult supervision for minors consistent with the University’s requirements for University-sponsored programs.

Direct Contact: Authorized adult positions with the possibility of care, supervision, guidance, or control of minors or routine interaction with minors.

One-on-One Contact: Personal, unsupervised interaction between any Authorized Adult and a minor participant without at least one other Authorized Adult, parent, or legal guardian being present. One-on-one contact between an Authorized Adult and a minor is prohibited, except as permitted under Paragraph 9 of this policy.

Policy

Sponsoring Unit

A sponsoring unit offering or approving a program which involves minors or provides University housing for minors participating in a program, or a non-University group being sponsored for a program, whether utilizing University housing or not, shall:

1. Establish a procedure for the notification of the minor's parents or legal guardians in case of an emergency, including medical or behavioral problem, natural disaster, or other significant program disruption. Authorized Adults with the program, as well as participants and their parents or legal guardians, must be advised of this procedure in writing prior to the participation of the minors in the program. The signature of a parent or legal guardian must be obtained on the notification form acknowledging receipt of the information prior to participation of the minor in the program.
2. Provide a list of all program participants and a directory of program staff to the Department of Campus Safety. If University housing is provided, to a sponsoring unit or to a non-University group being sponsored for a program, a list of program participants and a directory of program staff will be provided to both Campus Safety and Residence Life. This list shall include each participant's name, local room assignment (if applicable), gender, age, address, and phone numbers of the parents or legal guardians, as well as emergency contact information.
3. Provide information to the parents or legal guardians detailing the manner in which the participant can be contacted during the program.
4. Obtain a Medical Treatment Authorization form signed by a parent or legal guardian. All Medical Treatment Authorization forms must include the following:
 - a. A statement informing the parents or legal guardians that the University does not provide medical insurance to cover medical care for the minor.
 - b. A statement authorizing the release of medical information (HIPAA) and emergency treatment in case a parent, legal guardian, or emergency contact cannot be reached for permission.
 - c. A list of any physical, mental or medical conditions the minor may have, including any allergies that could impact his or her participation in the program. Where applicable, the need for administering medication by Authorized Adults must be specified. Medications to be administered by the minor must also be authorized by the parents or legal guardians.

- d. All emergency contact information including name, address, and phone number of the emergency contact.
5. Follow guidance from the University Health Center, or a recognized authority, such as the Centers for Disease Control, concerning communicable diseases.

Proper Handling of Medications

6. Authorized Adults must have access to first aid kits containing appropriate supplies. First aid kits must be readily available at all times, whether minors are on University premises or elsewhere. The contents of first aid kits must be approved by the University's Risk Manager, and contents must be appropriate to the program activity. An Authorized Adult shall be assigned the responsibility of ensuring the availability of a first aid kit when on or off University premises. Participants' medicines may be distributed by program (adult) staff, under the following conditions:
 - a. The participant's parents or legal guardians provide the medicine in its original pharmacy container labeled with the participant's name, medicine name, dosage, and timing of consumption. Over-the-counter medications must be provided in their manufacturers' container.
 - b. Staff shall keep the medicine in a secure location, and at the appropriate time for distribution shall meet with the participant.
 - c. The staff member shall allow the participant to self-administer the appropriate dose as shown on the container.
 - d. Any medicine which the participant cannot self-administer, must be administered by an Authorized Adult staff member according to the dosage and timing indicated for consumption. Any medicines administered by an Authorized Adult must be recorded on a log maintained for the individual participant (not a group log), indicating:
 - Name of participant
 - Medication administered
 - Dosage
 - Date medication was administered
 - Amount of medication givenThe Authorized Adult staff member must also initial each entry.
 - e. Personal "epi" pens and inhalers may be carried by the participant during activities.
 - f. Authorized Adults shall not administer medication by injection except for an "epi" pen in emergency situations where the participant is unable to self-administer the "epi" pen and emergency medical personnel are not available.
 - g. Each Authorized Adult shall be informed in advance of commencement of the program of how to access emergency medical services at all locations.

Safety Measures

7. Authorized Adults shall follow appropriate safety measures approved by the University's Risk Manager and Department of Campus Safety.

Adequate Supervision of Minors

8. Ensure adequate supervision of minors while they are on University property, or engaged in University sponsored or approved programs, whether on or off University property. Except for circumstances outlined in Paragraph 9 below, all activities involving minors must be supervised by at least two (2) or more Authorized Adults, with at least one of the Authorized Adults being at least twenty-one (21) years of age, or by the minor's parents or legal guardians at all times. Some of the factors to consider in determining "adequate supervision" are the number and age of the participants, the activities involved, type of housing, if applicable, and age and experience of the counselors.
9. When APU students are hosting high school students, including prospective athletes participating in pre-enrollment visitation, or where instructors are providing music lessons on an individual or small group basis where the lessons can be observed by others, the requirement for two (2) Authorized Adults will be waived. This requirement is also waived in cases where a licensed psychologist provides psychological and counseling services to minors, where social workers and nurses are working with minors in their professional capacity, or when the minor is being supervised by his or her parents or legal guardians.
10. All supervised participants in a University program or a program taking place on University property are permitted in the general use facilities (e.g., athletic fields, public spaces, academic buildings), but may be restricted from certain areas of the facilities (e.g., storage rooms, weight rooms, shower rooms, equipment rooms, athletic training rooms, lab spaces, staff/faculty offices) or from utilizing certain equipment.

Program Rules and Compliance

11. Develop and make available to participants and to all Authorized Adults the rules and discipline measures applicable to the program. Program participants, staff, faculty, volunteers, students, independent contractors, and consultants must abide by all University regulations and may be removed from the program for non-compliance with rules. The following must be included in program rules:
 - a. The possession or use of alcohol and the possession, manufacturing, selling, or distribution of illegal or controlled substances (drugs), fireworks, guns, and other weapons is prohibited.
 - b. The operation of a motor vehicle by minors or by any unauthorized adult is prohibited while attending and participating in the program. Only authorized adults may transport minors or other adults in their own vehicles or in University vehicles. Certain requirements, such as provision of DMV records, and provision of proof of insurance will apply.

- c. The parking of staff, volunteer, consultant, independent contractor, and participant vehicles must be in accordance with University parking regulations.
- d. The transporting of minors in University-owned or operated trolleys and buses, if applicable, must be in accordance with University policies and applicable state laws.
- e. APU rules and procedures governing when and under what circumstances participants may leave University property during the program apply.
- f. No violence, including sexual abuse or harassment, or other illegal activities will be tolerated.
- g. Hazing of any kind is prohibited. Bullying, including verbal, physical, and cyber bullying, are prohibited.
- h. No theft of property, regardless of owner, will be tolerated.
- i. No use of tobacco products (smoking is prohibited on all University premises) will be tolerated.
- j. Misuse or damage of University property is prohibited. Charges will be assessed against those participants who are responsible for damage or misuse of University property. Intentional damage (vandalism) to University property may also result in reporting to law enforcement authorities and the barring of the individual causing the damage from University-sponsored programs and premises.
- k. The inappropriate use of cameras, imaging, and digital devices is prohibited, including use of such devices in showers, restrooms, or other areas where privacy is expected by participants.
- l. Any posting of names, likenesses, photographs, or other identifying documents or materials related to any minor participant on social media is prohibited. Posting of names, likenesses, photographs, or other identifying documents or materials related to adults is strictly prohibited without the signed authorization of the adult.

Violation of these rules or of other University policies may result in discipline of the participants up to and including removal and dismissal from the program. It must also be made clear to Authorized Adults, counselors, volunteers, independent contractors, consultants, and others that violation of these rules may result in their removal and exclusion from the program as well.

Media and Liability Releases

- 12. Liability releases in a form approved by the APU Risk Manager must be signed by all participants (and a parent or legal guardian if the participant is a minor) in a program covered by this policy, if the use of names, likenesses, photographs, videotapes, or other materials which would result in identification of participants for any media-related purpose is planned, including where photographs, sound recordings, or videotapes will be taken by staff members. Where applicable, all media releases must be obtained as part of the program registration process. All releases and data gathered shall be kept confidential, is subject to records retention guidelines, and shall not be disclosed, except as provided by law.

Assigned Staff Member Accessible to Participants

13. Assign a staff member who is at least twenty-one (21) years of age to be accessible to participants. The staff member must reside in the housing unit, if applicable. Additional Authorized Adults will be assigned to ensure one-on-one contact with minors does not occur, except in approved circumstances (See Paragraph 9), and that appropriate levels of supervision are implemented.

Background Checks

14. All Authorized Adults who have direct contact with minors under a University-sponsored program are required to have a current background check on record with the University at the time of hire and beginning work with minors. This background check must be reviewed and approved by the Office of Human Resources prior to the individual being hired and working with minors. Background checks for those who will work with minors must include, at a minimum, the following:
 - (i) Fingerprint processing via FBI or other appropriate law enforcement records
 - (ii) County, state, and federal criminal background checks via an approved vendor
 - (iii) Checks via a national sex offender registry using the federal government's website. The Department of Justice's website is located at <https://www.nsopw.gov>. The site includes federal, state, territory, and tribal government registered sex offender information.
 - (iv) Driver record checks for anyone who will drive others (adults or minors) as part of participation in the program. This applies whether the individual will be driving his or her vehicle or a University-owned or leased vehicle.

The University's Office of Human Resources will handle the checks specified in (i) through (iv) for University-sponsored programs. Information obtained through background checks must remain confidential and shall not be disclosed to anyone who does not have a legitimate business need to know such information. Background checks conducted by a third-party vendor trigger federal Fair Credit Reporting Act requirements, including confidentiality provisions, certain disclosure provisions, and prior written authorization requirements. Federal and state restrictions on conducting background checks must be adhered to.

The costs of background checks for University-sponsored programs will be borne by the program.

In the case of non-University sponsored programs, it will be the responsibility of the organization or entity operating the program to ensure that all individuals, whether employees, volunteers, independent contractors, or others who have direct contact with minors have background checks which meet the requirements described above in (i) through (iv) prior to their arrival on University premises. The costs of background checks for programs using University facilities shall be borne by the organization or entity operating the program.

Criminal background checks will be repeated not less frequently than every three (3) years, unless the initial background check includes an element of automatic notification of subsequent arrests or convictions.

The University reserves the right to review any background checks of independent contractors, employees, and volunteers working or rendering services for any non-University sponsored programs, and the right to bar from University premises, at the University's sole discretion, anyone the University deems unsuitable based on information in the criminal background check. Likewise, background checks of University employees, independent contractors, or volunteers may be grounds, at the University's sole discretion, for barring such individuals from participating as Authorized Adults in University-sponsored programs.

15. Authorized Adults who work for programs which are not University-sponsored programs, but which have been permitted to use University facilities or premises, and who have direct contact with minors must also have a current background check on record with the same minimum requirements as set forth in Paragraph 14.

When there are high school students, including prospective athletes, participating in pre-enrollment visitation, the hosting APU students will not be required to undergo a background check.

Applications for Authorized Adults

16. Authorized Adults shall be required to complete applications before working with minors. If applying for employment, the Authorized Adult shall be required to complete an employment application. If the individual wishes to volunteer, he or she shall complete a volunteer application prior to working in any program involving minors.
17. A complete roster of Authorized Adults supervising, chaperoning, or interacting with minors, whether employees, volunteers, independent contractors, or consultants working with programs not sponsored by the University, must be provided to the unit sponsoring the program and the Department of Campus Safety prior to commencement of the applicable program. The Department of Student Affairs and the Department of Campus Safety must be notified within twenty-four (24) hours of changes to the roster.

Supervision in University Housing

18. If applicable, require the program to adopt and implement rules and regulations for proper supervision of minors in University housing. The following must be included:
 - a. Written permission signed by the parents or legal guardians for the minor to reside in University housing.
 - b. A curfew time of 12:00 a.m. (midnight) for high school students. If students younger than typical high school age are being supervised in University housing, an earlier curfew, if deemed age-appropriate for the participants, may be established. However, high school students may stay out later than the 12:00 a.m. (midnight) curfew

provided that the students are accompanied by their APU student ambassadors. This is to accommodate traditional activities (e.g., Donut Man run) and planned activities (e.g., Midnight Madness) that occur after midnight.

- c. Guests of participants (other than a parent or legal guardian and other program participants) or guests of authorized adults are restricted to visitation in the building lobby and floor lounge, and only during approved hours specified by the program. Guests of participants, including spouses, siblings, girlfriends or boyfriends, and other relatives, may not sleep in University housing or accompany participants or Authorized Adults on trips, or during any other activities, unless such individuals are approved volunteers who have gone through the appropriate screening process (including background checks) required of other Authorized Adults.
- d. The program must comply with all security measures and procedures specified by Student Affairs and Campus Safety.
- e. Pre-enrollment visit programs for high school students housed overnight in residence halls must be registered with the Office of Residence Life and the Department of Campus Safety.
- f. Proper screening of APU student hosts, including confirmation that such student hosts are in good standing and have not been subject to discipline during their time at APU. Such screening shall also require verification that such student hosts were in good standing during their senior year in high school. Student hosts must complete an approved application, which shall be submitted to, and approved by, the Office of Residence Life prior to any hosting of high school student visitors. The application process for student hosts is currently handled by Undergraduate Admissions. The Christian character reference the University receives for incoming students shall be adequate verification that the student hosts are of good character, it being understood that the students' home high school does not provide APU with any verification regarding discipline issues.
- g. Where a prospective student host shares campus housing with other APU students, the other students in the shared housing must also be in good standing at APU. The names of all student hosts and their roommates will be sent to the Office of Residence Life on a watch list, and Residence Life will notify Undergraduate Admissions if there are any issues involving those students.

In Service Learning and Similar Programs

- h. In Service Learning programs where APU students provide tutoring or mentoring of K-12 students away from University premises (e.g., activities coordinated by the School of Social Work, such as at public libraries, public or private schools, community centers, or other non-University facilities), such activities shall take place in public areas of the facility. Otherwise, administrators at the school, library, community center, or other facility where the Service Learning activities are taking place will be responsible for establishing appropriate requirements for supervision of the K-12 students, and the student's participation in the program, including obtaining of any required permission forms from the parents or legal guardians.

Use of Restroom Facilities by Minors

- i. For any program activities taking place on University-owned or controlled premises, where one person restroom facilities are available, and if the minor is determined to be capable of properly taking care of his or her restroom needs without assistance, the minor shall be permitted to use the restroom unaided, with any Authorized Adults remaining outside of the restroom in a place where they are able to continue their supervision as soon as the minor finishes using the restroom. Where the only restroom facilities that are available are multi-stall facilities on University premises, where a minor is being accompanied on activities off of University premises or where the minor is unable to take care of his or her restroom needs unaided, the two (2) Authorized Adults rule set forth in Paragraph 8 will apply.

Ratio of Authorized Adults to Minors

19. The ratio of Authorized Adults to minor participants may vary depending on the age of the participants, the number of participants, and the ages and level of experience of the Authorized Adults. The following represent minimum standards for resident camps:
 - Two (2) Authorized Adults for every five (5) campers ages 4 and 5
 - Two (2) Authorized Adults for every six (6) campers ages 6 to 8
 - Two (2) Authorized Adult for every eight (8) campers ages 9 to 14
 - Two (2) Authorized Adults for every ten (10) campers ages 15 to 17

Standards for non-residential camps and programs are:

- Two (2) Authorized Adults for every six (6) participants ages 4 and 5
- Two (2) Authorized Adults for every eight (8) participants ages 6 to 8
- Two (2) Authorized Adults for every ten (10) participants ages 9 to 14
- Two (2) Authorized Adults for every twelve (12) participants ages 15 to 17

The foregoing ratios shall apply to both University and non-University sponsored programs, it being understood that for such programs the responsibility for meeting the adult to minor ratio shall be solely the responsibility of the organization or entity overseeing the program.

With regard to Mexico Outreach, and while the ratios indicated above are required, meeting the adult to minor ratios shall be the responsibility of the church groups or other entities who participate in Mexico Outreach, and not the responsibility of the University. Background check requirements, as outlined in this policy, including the costs of such background checks, and the requirement to make such background checks available to designated University representatives upon request, shall also be the responsibility of the church groups or other entities sending adults to supervise minor participants in Mexico Outreach.

Training and Responsibilities of Authorized Adults

20. Training for Authorized Adults, including counselors and volunteers must include, at a minimum, information about responsibilities and expectations; policies, procedures, and enforcement; appropriate crisis/emergency responses; safety and security precautions;

administering of first aid; confidentiality issues involving minors; mandated reporting; and University responsibility/liability.

21. Responsibilities of Authorized Adults, including counselors and volunteers must include, at a minimum, informing program participants about safety and security procedures, University rules, rules established by the program, violations of rules which may result in discipline, including dismissal from the program, behavioral expectations, reporting of crimes against minors, and mandated reporting of child abuse and neglect. Counselors and other Authorized Adults are responsible for following and enforcing all rules and must be able to provide information included in this policy to program participants and be able to respond to emergencies.
22. Each Authorized Adult who will be participating in a program covered by this policy shall attend annual mandatory training on the conduct requirements of this policy, on protecting participants from abusive emotional and physical treatment, and on appropriate or required reporting of incidents of improper conduct to the proper authorities including but not limited to appropriate law enforcement authorities.

Mandatory Reporting of Child Abuse

23. Mandatory reporters of child abuse, as defined by state law, include specific roles, including teacher, social worker, peace officer, and therapist. The University's reporting requirement, however, is much broader, and includes all Authorized Adults as defined by this policy.

If a program participant discloses any type of assault or abuse (at any time previously or during the program), or if an Authorized Adult has reason to suspect that the participant has been subject to such assault or abuse, the Authorized Adult, as a mandated reporter, shall inform the Program Director and Child Protective Services ("CPS") immediately. If the Program Director is not immediately available, the Authorized Adult shall proceed to making a report to CPS, as a mandated reporter, and inform the Program Director of the report at the earliest possible opportunity. The Authorized Adult shall call the CPS Hotline to make the report. The CPS Hotline numbers for Los Angeles County are:

(800) 540-4000 – Within California
(213) 639-4500 – Outside California
(800) 277-6699 – TDD [Hearing Impaired]

As a mandated reporter, the Authorized Adult is required to report any type of assault or abuse whether or not the minor participant cooperates in the reporting, and whether or not the minor asks the Authorized Adult not to make the report. The Authorized Adult shall never instruct or require the minor to make the report or participate in the reporting process. The Authorized Adult must follow up the phoned-in report with a written report to CPS within thirty-six (36) hours of filing the oral report. The Suspected Child Abuse Report form may be accessed through the State of California Department of Justice website at <https://oag.ca.gov/search-results/?query=8572> (Form 8572).

When contacting CPS, the mandated reporter shall include all available information regarding the known or suspected abuse or neglect, including but not limited to the name of the minor, his or her whereabouts, the names and addresses of the parents, legal guardians, or caretaker, and the character and extent of the injuries. The report shall also contain, if known, any evidence of previous injuries to the minor and any other pertinent information that might establish the cause of the injury or injuries, and the identity of the person or persons believed to be responsible for the injury.

Reporting shall never be delayed in order to attempt to gather evidence. This is not the mandated reporter's role, and is not in the best interest of the minor. CPS and/or the appropriate law enforcement agency will determine if an investigation is appropriate.

The Program Director shall also notify the Office of the General Counsel of such report immediately after reporting the assault or abuse to the CPS hotline.

Authorized Adults must make all reasonable efforts to ensure the safety of minors participating in programs and activities covered by this policy, including removal of minors from dangerous or potentially dangerous situations, irrespective of any other limitations or requirements. Authorized Adults shall not, however, attempt to visit the homes of parents or legal guardians, nor shall Authorized Adults engage in any arguments or confrontations with parents, legal guardians, or caregivers. The appropriate authorities will determine what actions should or should not be taken.

If a situation presents immediate danger to a minor, the Azusa Police Department shall be contacted immediately if the minor is on campus or in the City of Azusa, and the appropriate city police department shall be contacted if the minor is outside of the City of Azusa. The University's Department of Campus Safety shall also be notified of immediate danger to a minor participating in a University-sponsored program or a program authorized to use University facilities.

Prohibited Conduct by Authorized Adults

Authorized Adults:

- a. Shall not share accommodations with minors. Separate accommodations for adults and minors are required other than the minor's parents or legal guardians, and other than arrangements where a high school student is hosted by an APU student who will be sharing his or her room during the high school student's visit.
- b. Shall not engage in abusive conduct of any kind toward, or in the presence of, a minor.
- c. Shall not strike, hit, administer corporal punishment to, or touch in any inappropriate or illegal manner any minor or any adult in the presence of a minor.
- d. Shall not pick up minors from or drop off minors at their homes, other than the driver's child or children, except as specifically authorized in writing by the minor's parents or legal guardians.

- e. Shall not provide alcohol or illegal drugs to any minor. Authorized Adults shall not purchase, obtain or use alcohol or illegal drugs in the presence of any minor or on University premises. Authorized Adults shall not provide prescription drugs or any medication to any minor unless specifically authorized in writing by the parents or legal guardians as being required for the minor's care or for the minor's emergency treatment. A participant's medicines may be distributed by program staff, following the conditions outlined in Paragraph 6 of this policy. Faculty, staff, employees, and volunteers are expected to refrain from the illegal possession and illegal use of drugs or alcohol at all times, and from the use of tobacco products on any University premises and when working with minors.

Gifts to Minors

- f. Authorized Adults shall never accept gifts from or give gifts to minors without the prior knowledge and approval of their parents or legal guardians. Any gifts permitted by parents or legal guardians must be age appropriate and of nominal value. Authorized Adults shall never accept gifts from or give gifts to minors' parents or legal guardians, unless the same or similar gifts of nominal value are given to all parents or legal guardians of minors in the program.

Inappropriate Materials Prohibited

- g. Authorized Adults must never provide inappropriate videos or reading materials, or direct minors to sources where they can access inappropriate videos, reading materials, or other materials. This includes an absolute prohibition against making sexual materials available in any form to minors participating in programs or activities covered by this policy, or assisting them in any way to gain access to such materials.

Allegations of Inappropriate Conduct by an Authorized Adult

24. If an allegation of inappropriate conduct has been made against an Authorized Adult participating in a program, he or she shall discontinue any further participation in programs and activities covered by this policy until such allegation has been satisfactorily resolved.

Communications Between Authorized Adults and Minors

25. For the protection of all concerned, the key safety concept that will be applied to these interactions is transparency. The following steps will reduce the risk of private or otherwise inappropriate communication between Authorized Adults and minors:
 - Communications between Authorized Adults and minors that are outside of the role of the professional or volunteer relationship is prohibited.
 - Where possible, email exchanges between a minor and a person acting on behalf of the University must be made using an apu.edu email address. Email communications between an Authorized Adult and a minor shall also include another adult, except where confidential counseling is involved.

- Electronic communications on a University network or platform between APU personnel or volunteers and minors may be subject to monitoring by authorized APU personnel.
- Except in emergency situations, text messaging between Authorized Adults and minors shall be avoided.
- Communications and postings via social media (e.g., Facebook, Twitter) shall be avoided, except when specifically approved by the parents or legal guardians.

Records Retention

26. Adherence to this policy requires the generation and retention of various records, including but not limited to signed parental permission forms; employee, independent contractor, and volunteer screening and selection documents; training certifications; agreements with outside parties; documentation of complaints; and results of investigations. Retention of these documents is an essential part of programs involving minors. Retention periods may vary from state to state and from country to country. In some states, there is no limit on the time period for which such records must be maintained. In others, the time period does not begin to run until the minor reaches the age of majority. Consequently, records related to programs involving minors must be retained in locked confidential files for not less than seven (7) years by the University department sponsoring the program, except for background check documentation. Background check documentation shall be kept in the Office of Human Resources for a minimum of seven (7) years.

[end]