

Procedures for Implementing the University of Illinois at Chicago Protection of Minors Policy (Revised 9/6/17)

University of Illinois at Chicago

I. Purpose

The purpose of this document is to implement sections III.4, III.5, and III.6 of the “University of Illinois at Chicago Protection Of Minors Policy” (“the Policy”).

II. Processes/Procedures/Guidelines

The requirements below regarding reports and background checks apply to all Chicago campus programs and activities designed to include minors that are not enrolled at the University. This includes but is not limited to camps, summer programs, lessons, performances, tutoring, workshops, clubs, teams, projects, practices, tours, or open-houses. These requirements **do not** apply to the following programs and activities:

- Regularly scheduled classes or activities designed primarily for enrolled students or individuals accepted for enrollment;
- Single commercial performances or events open to the general public (such as varsity athletic competitions, or public plays or concerts);
- Programs placing enrolled students with external entities for the purpose of receiving academic credit and/or completing clinical or student teaching requirements;
- Research activities that have been approved by the Institutional Review Board (IRB) with safety protocols in place;
- University of Illinois Extension program activities.
- Others, as may be determined from time to time by the campus.

Units responsible for the programs and activities exempted from these procedures are still expected to comply with all other applicable University policies and procedures as well as any applicable state or federal laws or regulations that might otherwise require program reports or background checks.

III. Campus and Program Safeguards

UIC requires that units planning or conducting programs or activities designed to include minors who are not enrolled at the University report said activities to the UIC Protection of Minors Office on the supplied forms found at

http://www.hr.uic.edu/UserFiles/Servers/Server_1316432/File/d_HR_forms/d_01_general/Protection_of_Minors_Event_Form_And_Checklist.pdf

The department head or supervisor (1) who oversees a unit sponsoring activities or programs designed to include minors and/or (2) whose unit/department is operating University facilities used by external

entities for activities with minor participants, is principally responsible for ensuring that the following requirements are met. Documentation regarding these requirements shall be maintained at the unit or department level. Sensitive information shall be kept in a secure, limited access location.

As detailed further below, the nature of the review of the programs or activities designed to include minors does not address the content of the program or activity. The review is conducted solely for the purpose of ensuring that the procedures and safeguards to be implemented by the unit/department are adequate given the circumstances and nature of the intended contact with minors. Approval should be given when the unit sponsoring the activity or program commits to implementing the appropriate safeguards.

1. When a Unit Sponsors an Activity Involving Minors:

- a. Activity Information: The unit shall maintain an up-to-date list of all activities or programs designed to include minors who are not enrolled at the University. Such list shall include each program's dates, times, locations, estimated attendance (age range and number of participants), and the contact information for two responsible individuals who will make arrangements for the safety of minors and other participants in the event of an emergency. At least fourteen (14) days prior to the start of an activity, the responsible unit shall submit this information to the Protection of Minors Office by filling out the supplied form. Untimely submission of and/or incomplete information on the form could result in the delay or cancellation of the activity.
- b. Activity Protocols: Units shall have in place, enforce, and make available protocols as set forth below and must include plans for addressing the following areas, if they are applicable to the activity. The Protection of Minors Office, in consultation with other appropriate offices and with the head of campus unit or department that is sponsoring the activity, will determine the adequacy of the protocols. These protocols must be submitted along with the form:
 - i. Transportation: to include a statement describing the transportation of minors at the beginning and end of the activity, to and from the activity, and within the program, whether by parents, guardians, staff or others. Activities must comply with university policies regarding drivers and vehicles.
 - ii. Plans for weather emergencies and other emergencies.
 - iii. Plans for providing adequate supervision for minors.
 - iv. Plans for educating event personnel about appropriate conduct standards with and around minors.
 - v. Plan for alerting participants about how to report issues, including issues with peers, event personnel and others.

- vi. Plan for collecting and maintaining appropriate permission forms, medical contact information and liability waivers. Forms should be safeguarded and readily available. A blank copy of the forms used should be provided.
 - vii. Plans for addressing medical emergencies.
- c. Overnight Activities: Activities including overnight stays by minors must include the following additional protocols:
- i. Describe the identification to be worn by staff members, and participants if appropriate.
 - ii. State the applicable curfews.
 - iii. Provide a copy of the code of conduct or other conduct standards for participants.
 - iv. Describe where adults will sleep and their proximity to the minors.
- d. List of Names: Units shall submit, to the Protection of Minors Office, the names of individuals, including UIC personnel, volunteers and contractors who are responsible for the supervision or care of children, or whose duties would require close contact and/or alone time with minors who are not enrolled or accepted for enrollment at UIC.
2. When an external entity uses University facilities for activities involving minor participants:
- a. Activity Information: Units operating University facilities that are used by external entities for activities with minor participants shall maintain an up-to-date list of such activities. Such list shall include each program's dates, times, locations, estimated attendance (age range and number of participants), and the external entities contact information. **At least fourteen (14) days prior** to the start of an activity, the unit shall submit this information to the UIC Protection of Minors Office by filling out the supplied form. Untimely submission of and/or incomplete information on the form could result in the delay or cancellation of the activity.
 - b. Contract Requirements: Units operating university facilities shall require the external entity to enter a contract that includes appropriate indemnification provisions, using the appropriate contract forms and language supplied by the university. The provisions shall at a minimum require the external entity to assume legal and financial responsibility for and hold The Board of Trustees of the University of Illinois and its agents and employees harmless against the acts or omissions of the external entity's participants, employees, or agents, or any third party employees or agents which the external entity permits to assist with the event.

IV. Background Check Requirement:

- 1. Units shall not allow any adult person who is responsible for the supervision or care of minors, or whose duties would require close contact and/or alone time with minors who are not enrolled or accepted for enrollment at the University to participate in a University program or activity

designed to include minors without verifying the person has undergone a criminal background check and a sex offender registry check within the past two years unless an exception is granted per subsection (6) below. Units shall keep copies of background check results to serve as evidence that a clearance was received within the past two years.

2. The Protection of Minors Office, in consultation with other appropriate offices and with the head of campus unit or department that is sponsoring the activity, will determine eligibility for participation. No person whose background check shows a conviction of any sex-related offense or placement onto a register of sex offenders shall be permitted to be responsible for the supervision or care of minors, or to perform duties that would require them to have close contact and/or alone time with minors who are not enrolled or accepted for enrollment at UIC, except upon review and approval by the Protection of Minors Office, in consultation with other appropriate offices pursuant to these procedures. Other appropriate offices may include the Office of University Counsel, the Office for Access and Equity, Faculty Affairs Human Resources, the UIC Police Department, the Women's Leadership and Resource Center/Campus Advocacy Network, the Office of Student Affairs, and others as may be suggested by the circumstances. The Protection of Minors Office will memorialize the consultation for its records.
3. Units shall follow the Protection of Minors Office procedures for submitting names for completion of the background and sex offender registry checks **no less than fourteen (14) days prior to the start of the activity**. Untimely submission of and/or incomplete information could result in the delay or cancellation of the activity or disqualification of the person.
4. Units shall submit to the Protection of Minors Office the names of individuals who are responsible for the supervision or care of children, or whose duties would require close contact and/or alone time with minors who are not enrolled or accepted for enrollment at UIC. The Protection of Minors Office will use the information to verify that background checks have been completed for the individuals working with minors. All individuals whose background checks are not completed in advance of the event will not be approved to work with minors.
5. The University may become aware of relevant, non-conviction information that bears upon the suitability of any Member of the UIC Community to have close contact or alone time with minors. When that occurs, the Protection of Minors Office will take reasonable steps to verify the validity of the information and, to the extent permitted by law, in consultation with other appropriate offices and with the head of the campus unit or department that is sponsoring the activity, consider the information in determining whether or not to prohibit or limit that individual's contact with minors.
6. Exception to Background Check Requirement. With the approval of the Protection of Minors Office, in consultation with other appropriate offices, a unit sponsoring a University program or activity designed to include minors may be permitted to adopt alternative measures and safeguards instead of background checks. Units must submit the request for an exception to the background check requirement to the UIC Protection of Minors Office. That office will review the circumstances and consult with appropriate offices, and will provide its decision in writing.

V. Contacts and Resources

For more information about these procedures, consult the following resources:

- Workflow
- http://www.hr.uic.edu/UserFiles/Servers/Server_2716/File/d_HR_forms/d_01_general/Process_Flowchart2.pdf
- Frequently Asked Questions
- Units unsure of whether or not their program or activity should be reported may contact the Protection of Minors Office at (312) 355-5524, or uicpom@uic.edu
- Units seeking information about the background check requirements may contact cbcuichr@uillinois.edu

