

The logo consists of the words "BOSTON UNIVERSITY" in a white, serif, all-caps font, centered within a red rectangular box with a thin white border. The background of the slide is a grayscale photograph of a city street with trees, streetlights, and a tall building in the distance.

**BOSTON
UNIVERSITY**

Protection of Minors Program at Boston University

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Ruth Hartman, Labor Relations Representative, BU Human Resources

Nedra Abbruzzese-Werling, AVP for Compliance Services, Compliance Services Office

SPRING 2023

Introductions

Kate Gomes

Assistant Director
RISK MANAGEMENT



Ruth Hartman

Labor Relations Representative
HUMAN RESOURCES



Nedra Abbruzzese-Werling

Associate Vice President for
Compliance Services
COMPLIANCE SERVICES OFFICE



Introductions

Working Group Membership



Deputy Chief Bob Molloy

**BOSTON UNIVERSITY
POLICE DEPARTMENT**



**Kristin Gruber-Grunert
Center Director**

BOSTON UNIVERSITY CHILDREN'S CENTER



**Rene Fielding
Emergency Management
EMERGENCY MANAGEMENT DIRECTOR**



Lieutenant Dan Healey

**BOSTON UNIVERSITY
POLICE DEPARTMENT**

Minors Program Coordinator (MPC) Information

Session Goals



We want you to walk away from today's session better understanding:

- The basics of Boston University's Protection of Minors program
- Your role as an MPC
- Where to find MPC Resources
- Who to contact for Protection of Minors (PoM) questions or reporting suspected child abuse
- Fulfill one portion of your training obligation as an MPC

Note: This Training is not intended to be a comprehensive review of the PoM Policy. You should read and become familiar with the PoM Policy and Procedure on your own time. We are only covering high level concepts and PoM elements in this training.

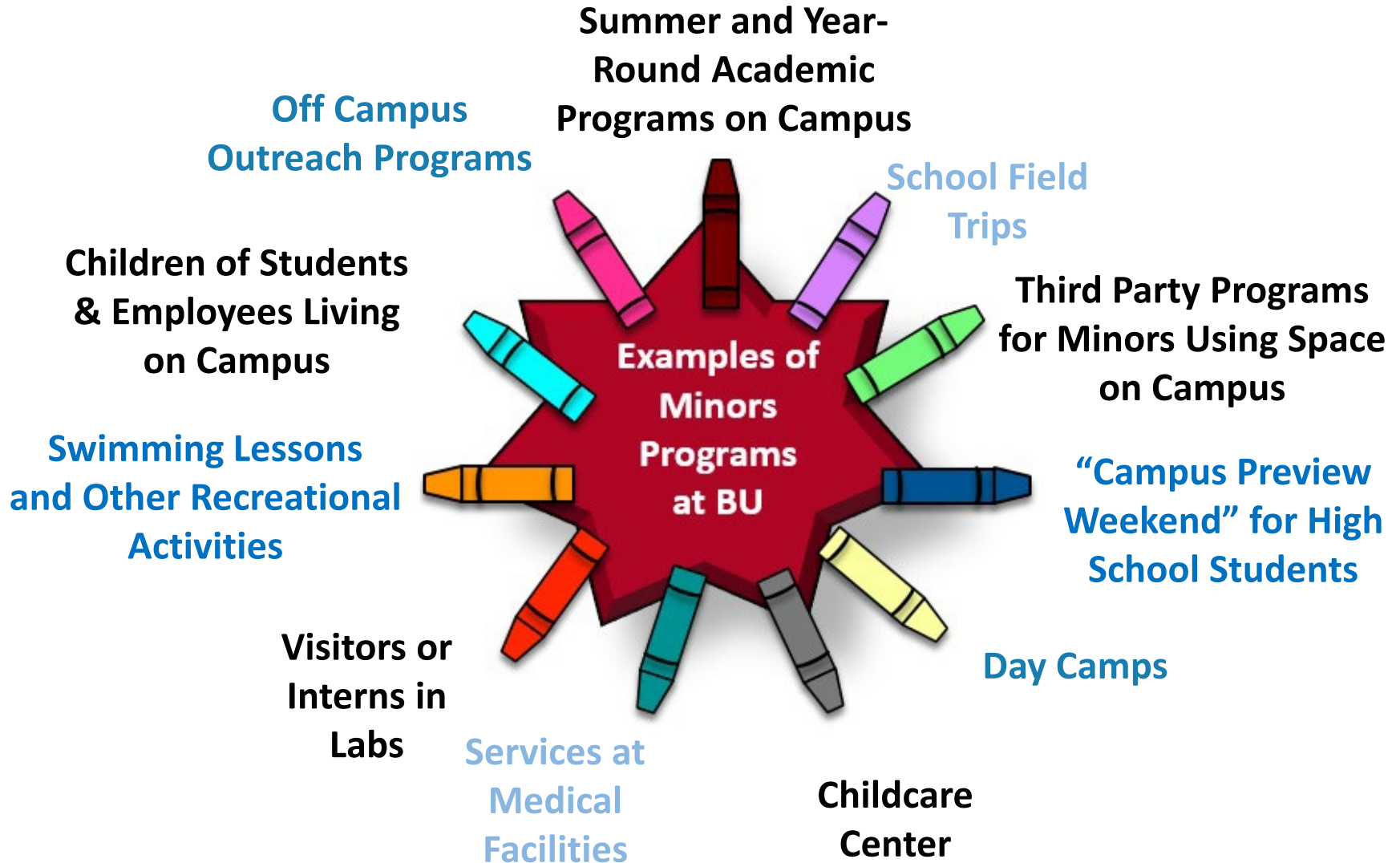
Introduction to Minors on Campus

Higher education institutions host children for many purposes in various contexts. Boston University hosts, and its community attends, many programs that involve **minors**, defined as **“any person under the age of 18 who is not a matriculated Boston University or Boston University Academy student and who is unaccompanied by a parent or legal guardian.”**



Introduction to Minors on Campus

Typical University Programs Involving Minors



Introduction to Minors on Campus

There are many risks associated with having minors on our campus and in our custody, including:

- Risk of harm to a vulnerable population;
- Financial risk to the institution - if abuse is alleged or has occurred (cost to investigate, costs associated with legal defense and liability);
- Reputational risk; and
- Potential impact on campus climate.

The decentralized nature of our campus creates additional challenges – programs involving minors are taking place throughout campus in different environments.

Since 2015, with the implementation of the Protection of Minors Policy and Program, BU has made significant strides towards implementing risk management measures aimed at fostering a safer environment for minors on campus and in BU's care and custody.



Our collective campus responsibility

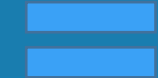
BU has a responsibility to **protect** minors on our campuses and in our custody and care, and to **reduce** the **risk of harm** through ongoing risk management and mitigation efforts aimed at keeping minors safe.



Introduction to Minors on Campus

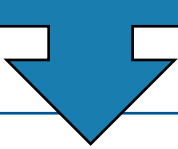
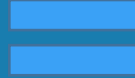
Institutional Failures that Allowed Ongoing Abuse at other Universities

Penn State



Failure of high-level officials to report the abuse to the proper authorities, or take action to prevent further abuse. Perpetuated a culture of abuse through inaction and silence in order to protect campus sports program.

Michigan State



Alleged failure to investigate and act in the wake of numerous reports and accounts of abuse. Alleged failure of high-level officials to report the abuse to the proper authorities, or take action to prevent further abuse.

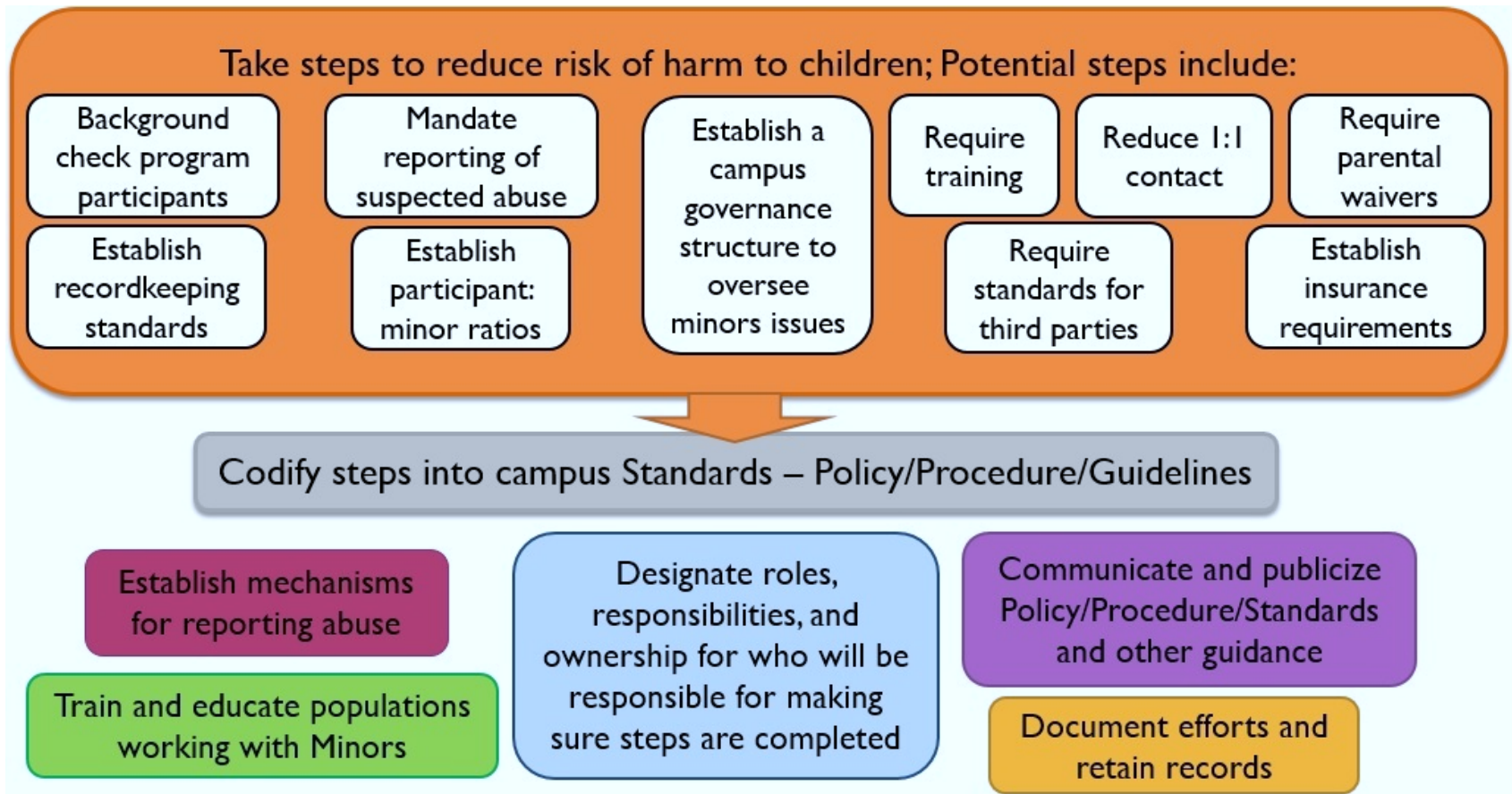
Lessons Learned

Reporting mechanisms, clear program structures and “owners” responsible for minors programs, training, and staff vetting are critical to keeping minors safe on campus.

Introduction to Minors on Campus

Elements of a Minors Protection Program Generally

Minors programs are designed to reduce the risk of harm to children. They include many of the following elements:



Minors Programs at BU

Minors Program Inventory of BU Programs



Each year, programs take place in schools, colleges, units, and departments across campus. These programs are required to follow the elements of the Protection of Minors Policy and Procedure. The program operators report up through a **Minors Program Coordinator (MPC) to Human Resources, which maintains the central inventory of all protection of minors programs.**

Minors Programs by the numbers: There are approximately 113 Programs, 72 BU (111,000 participants), 37 Third party minors programs (3,400 participants)*

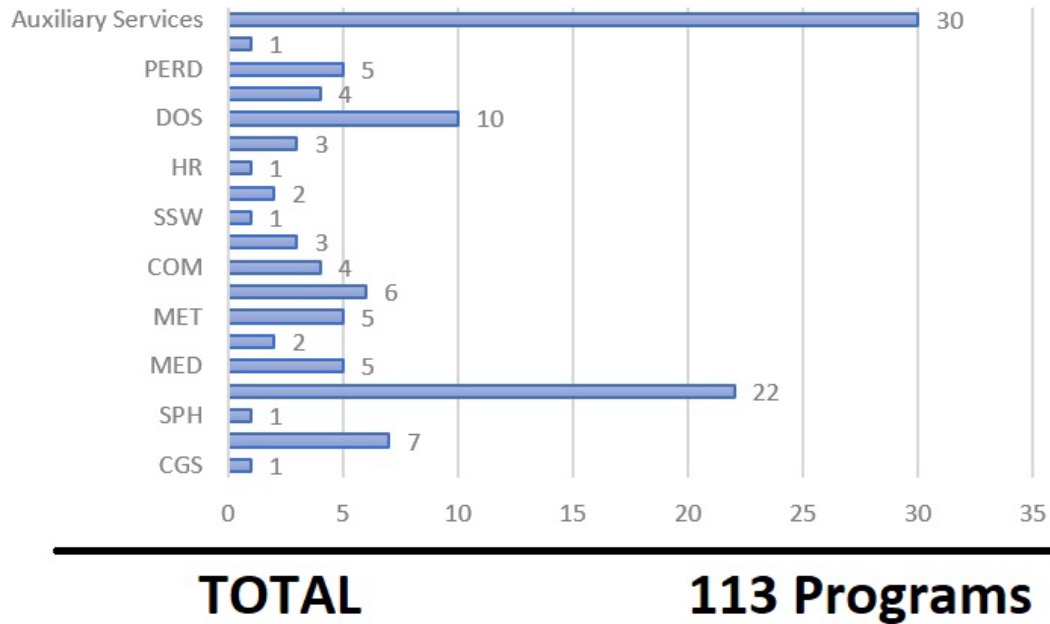
* Statistics come from the 2023-2024 inventory

Minors Programs at BU

2023-2024 Program Inventory Data

Where the Programs are Located

Number of Minors Programs by School/College/Admin. Unit



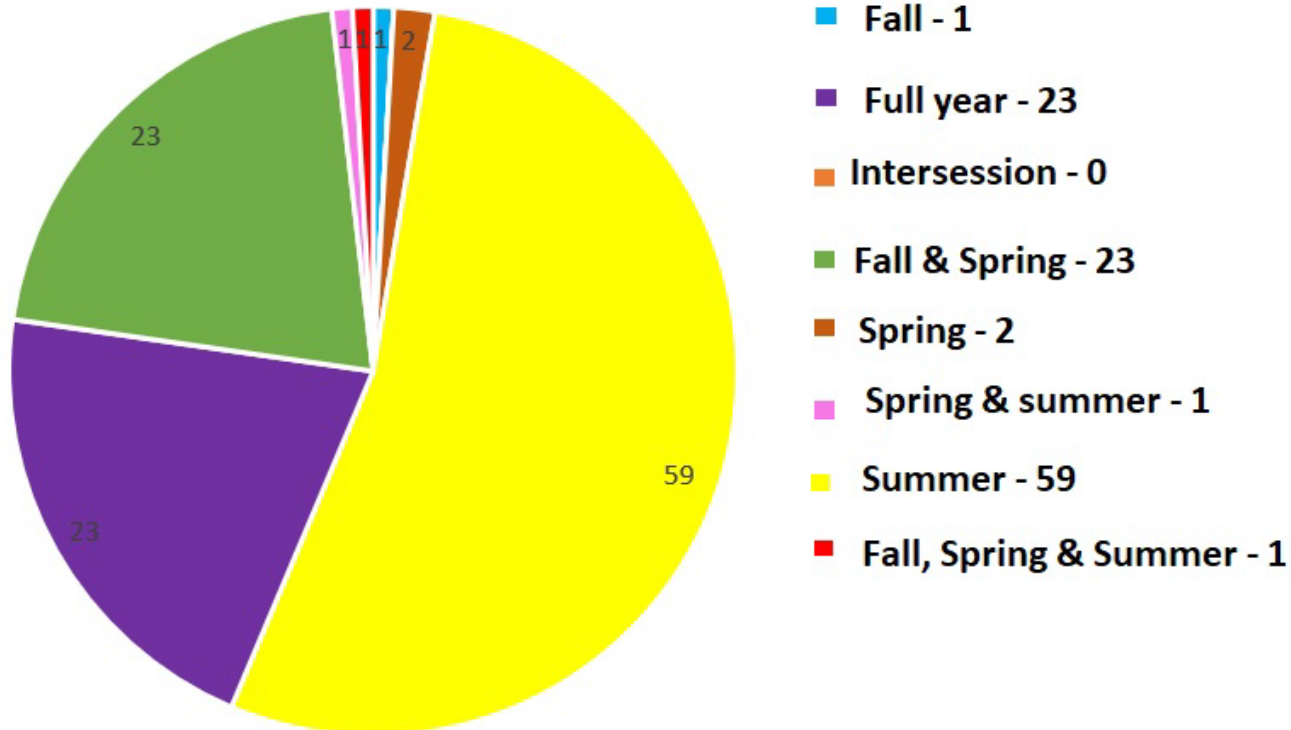
* Statistics as of the latest 2023-2024 Program Inventory

Minors Programs at BU

2023-2024 Program Inventory Data

Types of Programs

Minors Programs by Calendar Period



* Statistics as of the latest 2023-2024 Program Inventory

Minors Programs at BU

Minors Program Inventory of BU Programs

2023 - 2024 Minors Program Inventory

Sponsoring Department		Program Information			
School/College/Business Unit <input type="text"/>	Department <input type="text"/>	Name <input type="text"/>	Start Date <input type="text"/>	End Date <input type="text"/>	Calendar Period <input type="text"/> <small>a. Fall semester b. Interession c. Spring semester d. Summer e. Full year ex. a, b...</small>
MPC Information		Lead Program Operator Information		Emergency Contact Information	
Name <input type="text"/>	Email <input type="text"/>	Name <input type="text"/>	Email <input type="text"/>	Primary Name <input type="text"/>	Primary Cell <input type="text"/>
				Secondary Name <input type="text"/>	Secondary Cell <input type="text"/>
Program Profile Data					
BU Program <input type="text"/>	Anticipated Number of Program Staff <input type="text"/>	Anticipated Number of Minors <input type="text"/>	Number of Sessions <input type="text"/>	Anticipated Number of Minors <input type="text"/> <small>(total for Duration of annual program; auto calculate)</small>	Attendee Age Range <input type="text"/> <small>a. Child (0-4) b. Elementary (5-10) c. Middle (11-13) d. High (14-18) e. Adult (18+) ex. a, b...</small>
				Modality <input type="text"/> <small>Virtual In-Person Hybrid</small>	Activity <input type="text"/> <small>a. Academic (Non-Lab) b. Academic (Lab) c. Athletic d. Childcare e. Internship f. Recreation g. Other (On-campus) h. Other (Off-campus)</small>
				Overnight <input type="text"/> <small>Yes (if any) No</small>	BU Residence Hall <input type="text"/> <small>(if applicable)</small>
					General Campus Location(s) <input type="text"/>

The BU [program inventory](#) maintained on Sharepoint is an important tool for understanding the details of BU's minors programs (i.e. how many minors are on campus at on time, the contact information for the Program Operator, the nature of the program, and more).

The program inventory is a listing of BU's Minors Programs. MPCs are responsible for updating their minors program information each academic year. Access to the inventory is restricted to authorized PoM Program people. Email POM@bu.edu for access to the Sharepoint inventory.

A separate inventory of 3rd party Minors programs exists at Events and Conferences.

Elements of Minors Protection at BU

Program Elements

BU Protection of Minors PROGRAM ELEMENTS

Policy

- [Protection of Minors Policy](#)
- [Policy on Minors in Laboratories](#)

Procedure

- [Protection of Minors Procedures](#)

Policy Owner

Human Resources (HR) is responsible for Policy & Procedure management.

Guidance and Resources

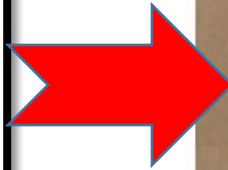
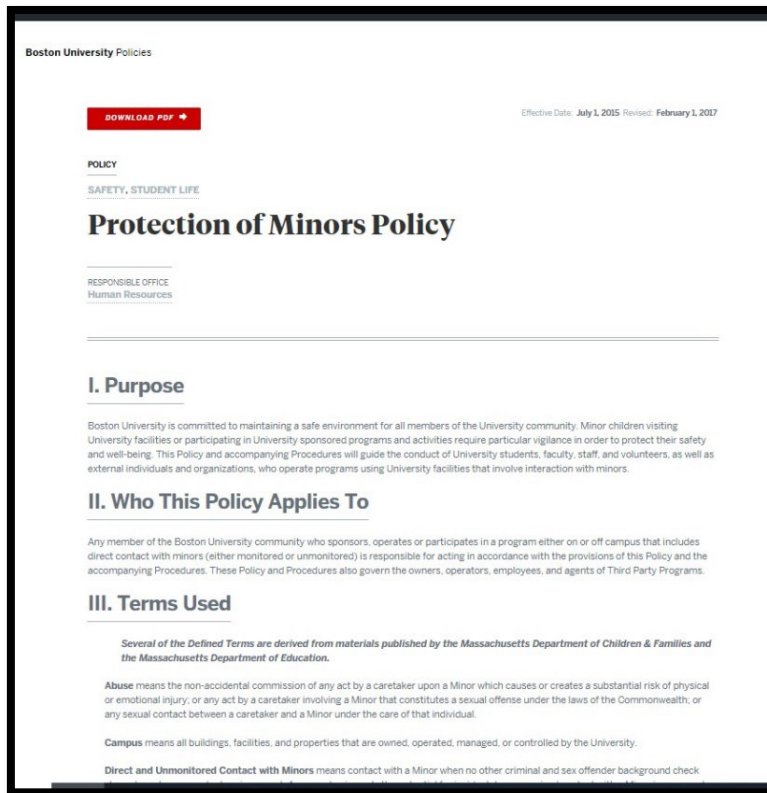
[Protection of Minors Website](#), with information on Background Checks, [Training](#), and [Reporting](#)
[Internal Sharepoint website](#) for Minors Program Coordinators, which includes checklists, forms, training materials, a toolkit, and an inventory of minors programs

Program Oversight

HR collaborates with the Office of the General Counsel (OGC), Risk Management, and the Compliance Services Office (CSO). Program Operators and MPCs contribute on an Advisory Committee and Working Group led by HR, with support from the Dean of Students Office (DoS), the Boston University Police Department (BUPD), and other stakeholders.

Elements of Minors Protection at BU

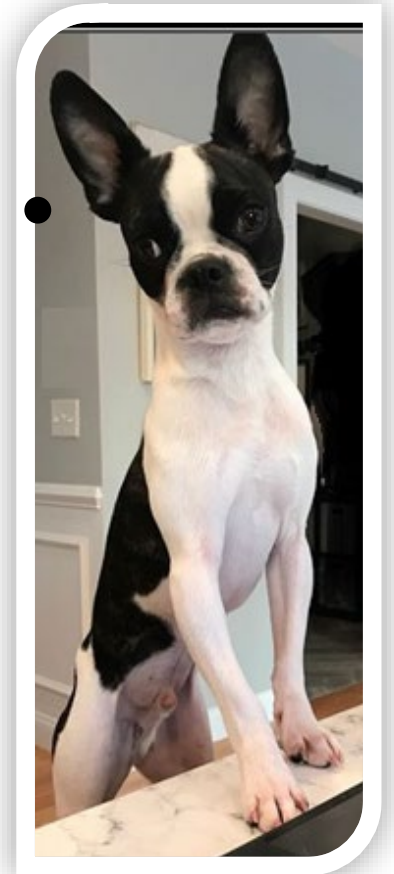
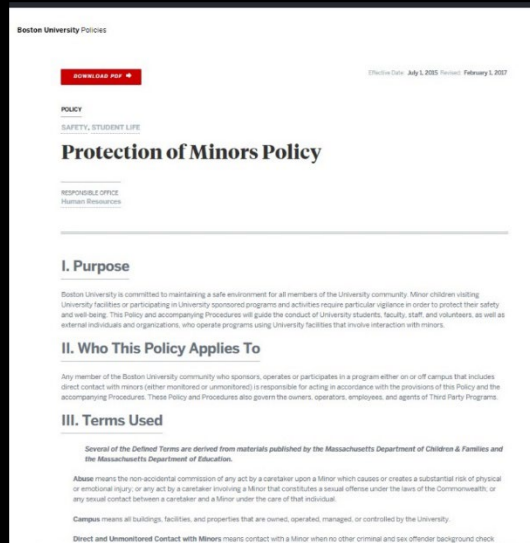
Core Elements of the Protection of Minors Policy



Elements of Minors Protection at BU

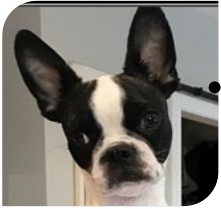
Core Elements of the Protection of Minors Policy

When does the
Policy apply?



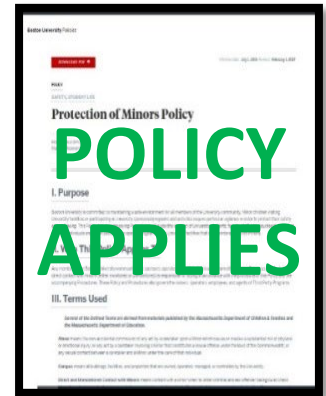
Elements of Minors Protection at BU

Considerations: Policy Applicability



When does the Policy apply?

Programs that include direct contact with minors where the care, custody, and control of the minor is taken over from the parent or guardian, whether the program is on or off campus, and whether BU sponsors the program or a Third Party sponsors the program.



Definition of a Minor (according to the PoM Policy)

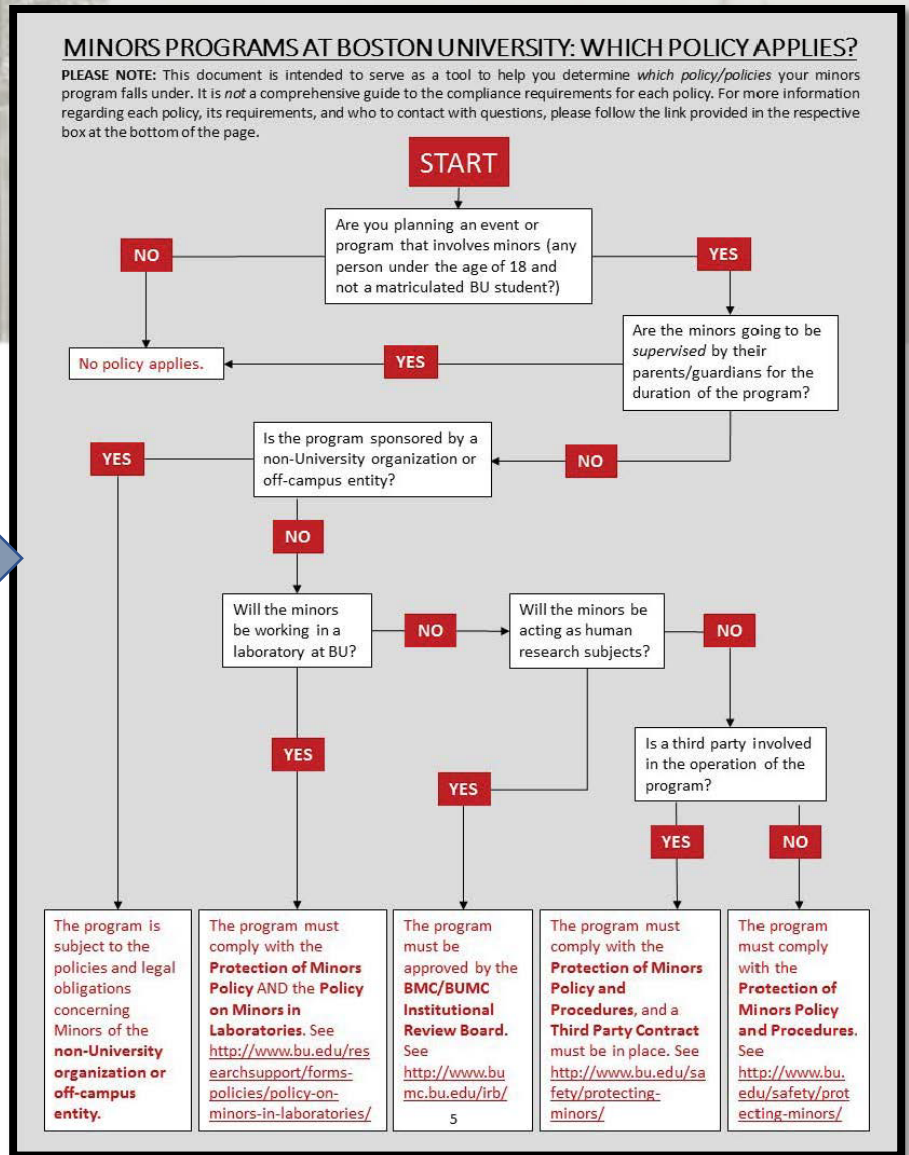


Any person under the age of 18 who is not a **matriculated*** Boston University or Boston University Academy student and who is unaccompanied by a parent or legal guardian.

- Exception: A person under the age of 18 who is participating in any Boston University Institutional Review Board-approved research activity is not considered a minor under this Policy.

* **Matriculated Student** – a student is considered matriculated upon the first day of classes or if he or she participates in any University operated and supervised activity occurring prior to the first official day of class.

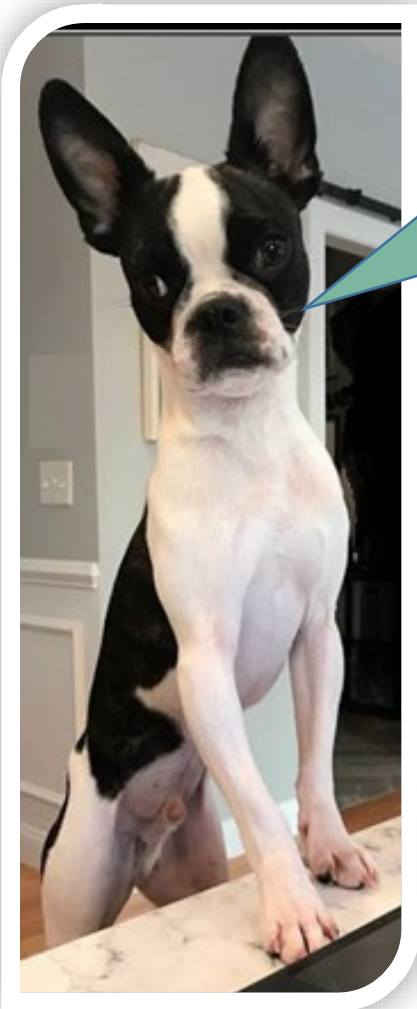
BU Flow Chart Tool to Assess PoM Policy Applicability



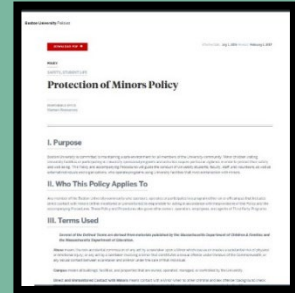
NOTE: Minors issues that are not covered by the Policy, Procedure, and Program are handled by the Program with help from OGC, Risk Management, HR, Compliance, and other offices as necessary.

Elements of Minors Protection at BU

Considerations: Policy Applicability



Once you determine if the Policy applies, what are the next steps?



- Any new or existing program involving minors must be brought into compliance with the POM Policy.
 - BU Programs: Compliance for each program is the responsibility of the Program Operator, who reports their compliance up to the MPC.
 - Third Party Programs: The Third Party is responsible for complying with the Policy.



Elements of Minors Protection at BU

Core Elements of the Protection of Minors Policy

**Steps
towards
Compliance
with the PoM
Policy**

Protection of Minors Policy Elements

- Background Checks
- Training
- Waivers of Liability
- Reporting
- Designated Responsibility
- Compliance with state and federal law
- Third Party Responsibilities
 - Written contract
 - Insurance
 - Adhere to Policy elements

Elements of Minors Protection at BU

Core Elements of the Protection of Minors Policy



REPORTING Abuse
and Neglect of
Minors

Protection of Minors Policy

Elements

- Background Checks
- Training
- Waivers of Liability
- Reporting
- Designated Responsibility
- Compliance with state and federal law
- Third Party Responsibilities
 - Written contract
 - Insurance
 - Adhere to Policy elements

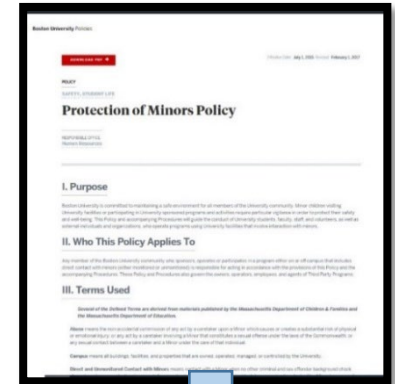
Protocols for Reporting

- How
- Where to contact
- What to Communicate

Elements of Minors Protection at BU

Policy Requirement - Reporting

The PoM Policy requires **Immediate reporting** on instances of known or suspected abuse or neglect of a minor to law enforcement, appropriate University officials, and Massachusetts officials.



Immediate reporting is mandatory



Elements of Minors Protection at BU

Policy Requirement - Reporting

Steps for REPORTING Safety Concerns Regarding a Minor

1 Law Enforcement

Immediately notify law enforcement. Remain with the minor until help arrives.

- On campus: Boston University Police Department (BUPD) 617-353-2121
- Off main campus: 911 or local law enforcement

2 [BU Online Reporting Form](#)

- Fill out online BU form no later than four hours after initial BUPD contact.

Should always be completed when someone knows, suspects, or receives information that the health or safety of a minor participating in any BU-sponsored or affiliated program/activity may be at risk (including suspected abuse or neglect).

3 Massachusetts Department of Children & Families

Use the Child-at-Risk Hotline, any time of the day or night, at 800-792-5200.

4 Notify a BU Employee with Authority

Promptly notify your supervisor, program director/operator, or dean, when it is safe and appropriate to do so.

5 Human Resources

The Human Resources office is available to provide advice and assistance, and may be reached at 617-353-2380. Human Resources should be aware of any suspected abuse/neglect in minors programs since the office facilitates the Protection of Minors Program.

Elements of Minors Protection at BU

Policy Requirement - Reporting

Warning Signs of Abuse – Types of Behaviors to Report

Physical Abuse

- Bruising, welts, or burns that cannot be explained
- Withdrawn, fearful or extreme behavior
- Injuries where children do not usually get injured (i.e., torso, back, neck, buttocks, thighs)

Emotional Injury

- Speech disorders
- Inability to play as most children do
- Sleeping problems
- Anti-social behavior or behavioral extremes
- Delays in emotional and intellectual growth

Sexual Abuse

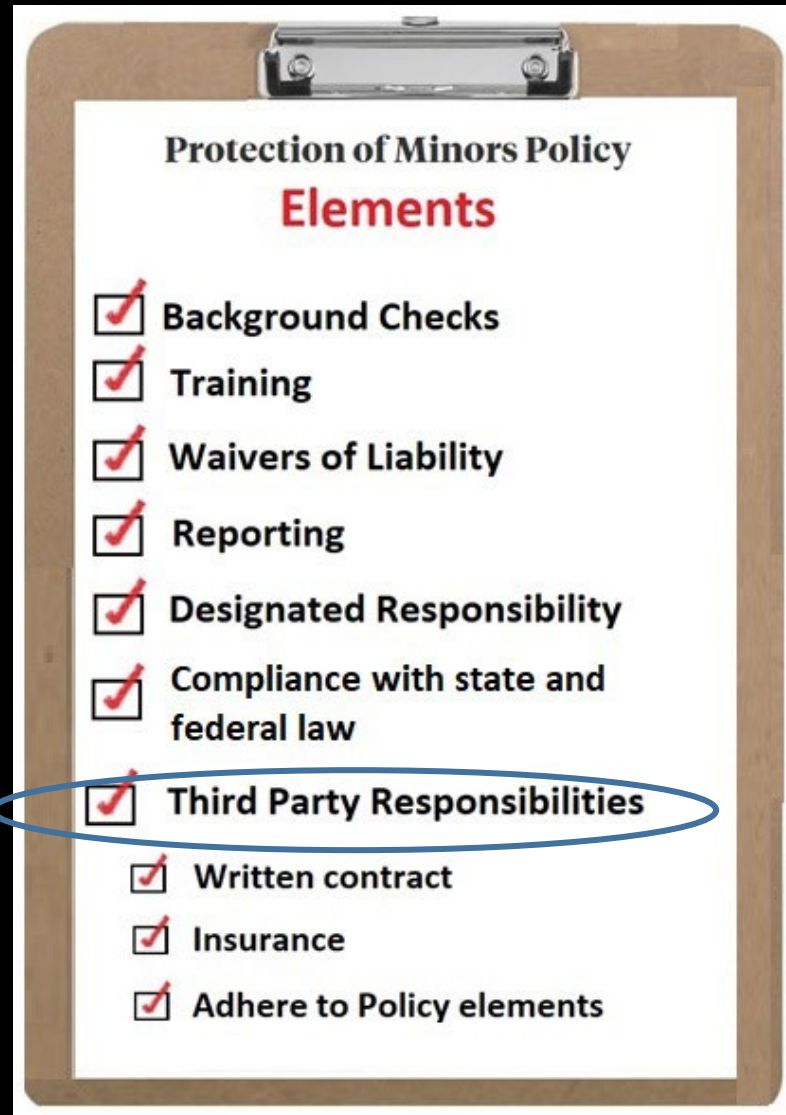
- Difficulty walking or sitting
- Pain or itching in genital area
- Torn, stained, or bloody underclothing
- Frequent complaints of stomachaches or headaches
- Feeling threatened by physical contact
- Inappropriate sex play or premature understanding of sex
- Frequent urinary or yeast infections

Neglect

- Lack of medical or dental care
- Chronically dirty or unbathed
- Lack of proper nutrition
- Lack of adequate shelter
- Self-destructive feelings or behavior
- Alcohol or drug use

Elements of Minors Protection at BU

Core Elements of the Protection of Minors Policy



**Third Party
Minors Program
Responsibilities**

**Distinction
between BU Minors
Programs *versus* a
Third Party Minors
Programs**

Elements of Minors Protection at BU

Considerations: BU Programs v. Third Party Programs

Type of Program

BU Minors Programs

Defined as “University Activities” – “services, programs, or activities that Boston University operates or sponsors, or in which University students, faculty, or staff engage in through their University roles and through which they will have Direct and Unmonitored or Monitored Contact with Minors.

Examples include: residential and non-residential programs operated by the University on Campus; off-Campus programs operated or formally facilitated by the University; and programs which the University does not operate, sponsor, or formally facilitate but in which University students, faculty, or staff participate in their capacity as students, faculty, or staff.

Responsibility for Compliance

Boston University

BU MPC’s and Program Operators have the obligation to ensure compliance with the elements of the BU POM Policy.

Third Party Program(s)

Defined as “non-University organizations and entities that lease, license, or otherwise use any BU property in order to operate programs or activities involving Minors.”

Third Party

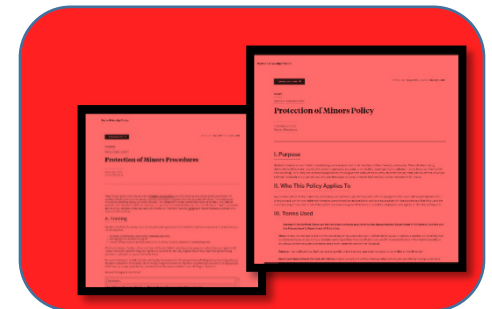
The third party has the obligation to comply with the PoM Policy and its various elements. BU’s obligations are to ensure a contract is in place with the third party that ensures the third party understands their responsibilities to follow the BU PoM Policy.

Elements of Minors Protection at BU

Policy Requirement – Third Party Compliance

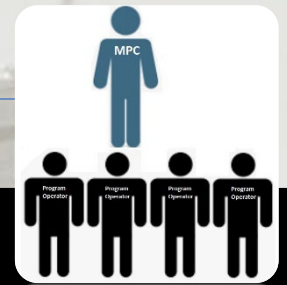
Third Parties Operating Minors Programs must

- Enter into a contract with the University prior to program operation;
- Carry/obtain insurance as required by Risk Management; and
- Comply with the Protection of Minors Policy and its corresponding Procedures.



Elements of Minors Protection at BU

Core Elements of the Protection of Minors Policy



Protection of Minors Policy Elements

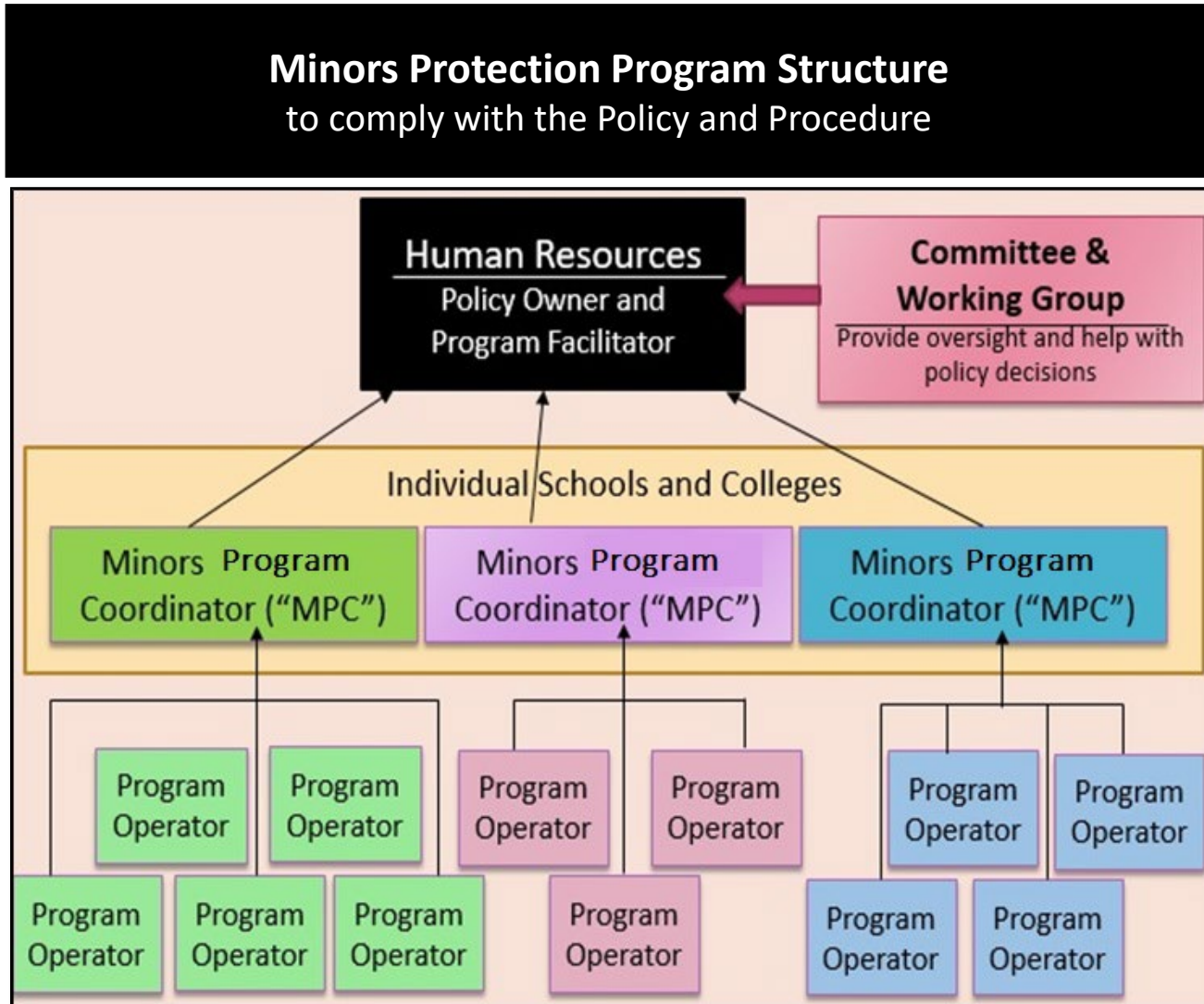
- Background Checks
- Training
- Waivers of Liability
- Reporting
- Designated Responsibility
- Compliance with state and federal law
- Third Party Responsibilities
 - Written contract
 - Insurance
 - Adhere to Policy elements

Designated
Responsibility
and Roles

Who is
responsible for
what
actions/tasks
under the PoM
Policy

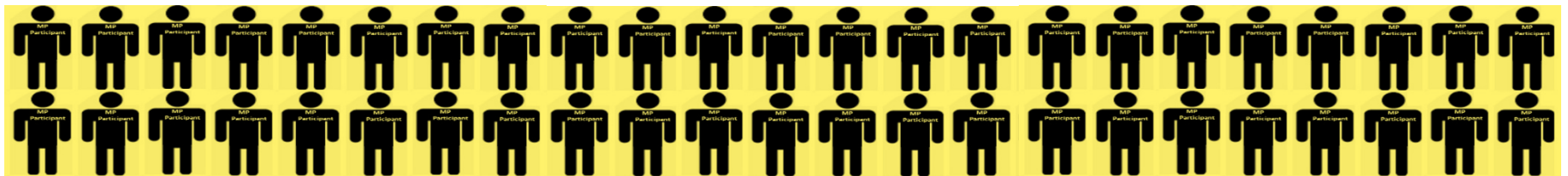
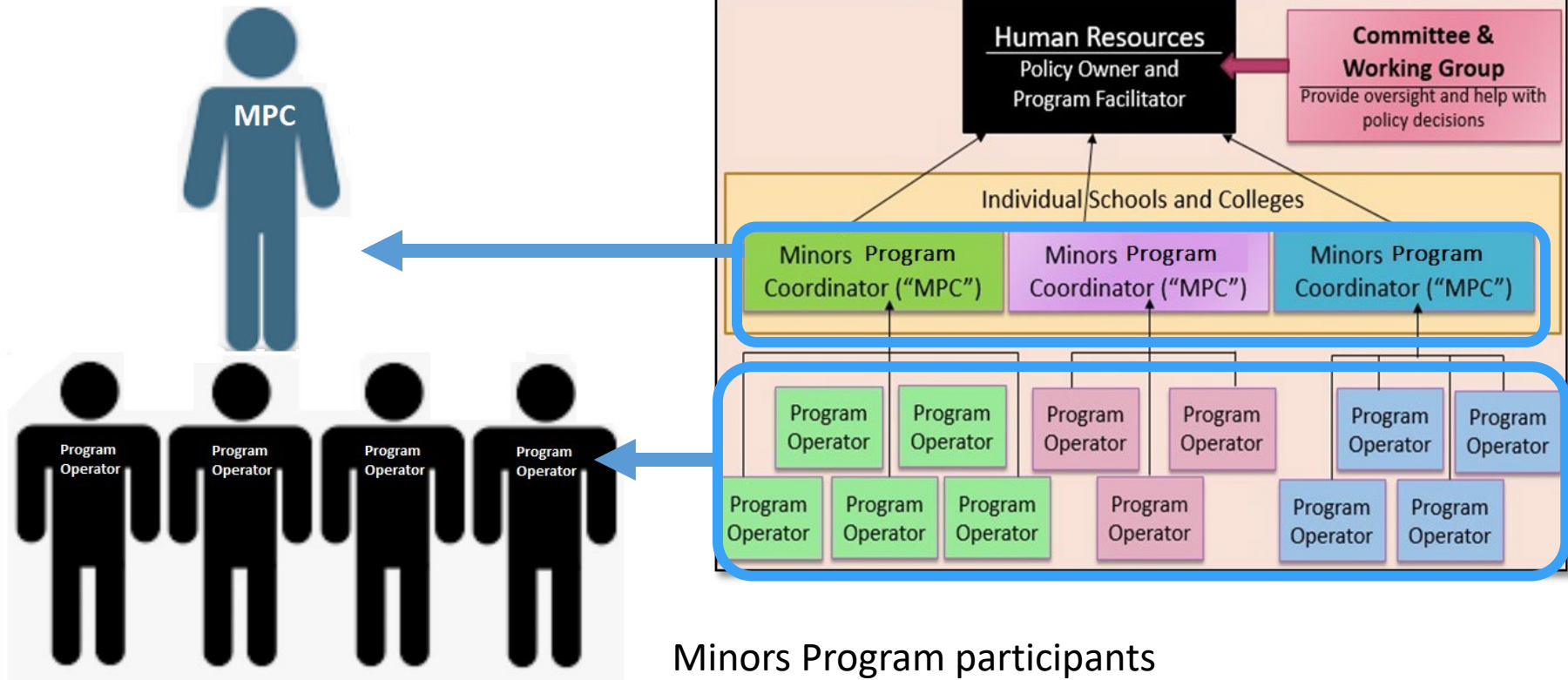
Structure of Minors Protection at BU

Role Designations established by the PoM Policy



Structure of Minors Protection at BU

Role Designations established by the PoM Policy



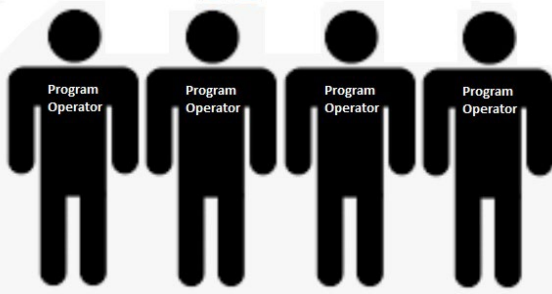
Structure of Minors Protection at BU

Role Designations established by the PoM Policy



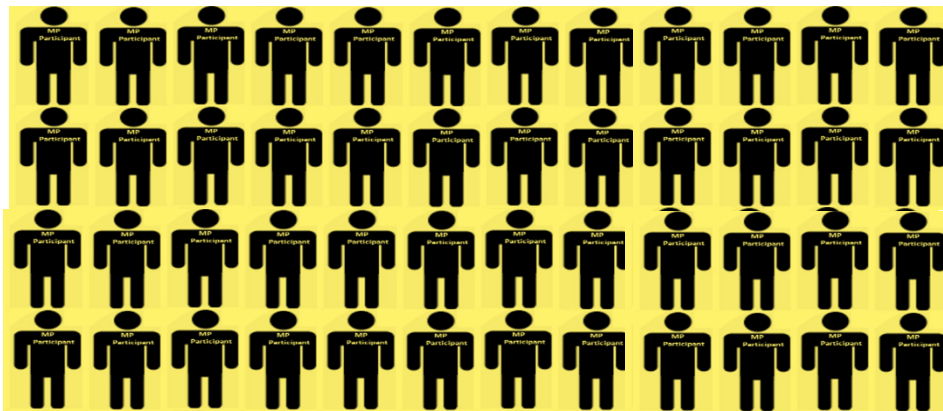
Minors Program Coordinator

The individual within each Boston University school, college, unit, or department sponsoring, operating, or participating in an on- or off-campus program involving minors who is primarily responsible for coordinating that department's obligations under this Policy, maintaining records, ensuring compliance within their area, including requiring Program Operators to report to them on Policy compliance.



Program Operator

Individuals who operate programs with minors who must report to MPC on Program activity and Policy compliance. They are primarily responsible for coordinating a particular minors program(s) obligations under the Policy.



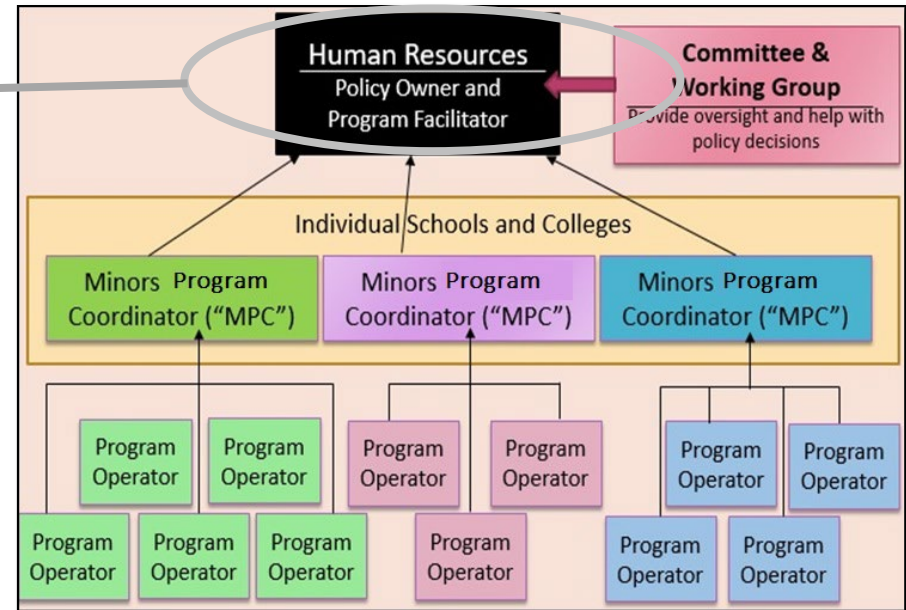
Minors Program participants

University students, faculty, staff, and volunteers who participate in Minors Program activities and programs.

Structure of Minors Protection at BU

Office Responsibility established by the PoM Policy

The Human Resources Office is “Responsible Office” charged with ensuring schools/colleges/unit/departments comply with the Policy; Centrally maintains MPC contact information, and Minors Program information (Program, location, # of participants, etc.); ensure accessible information and guidance for MPCs and Program Operators.



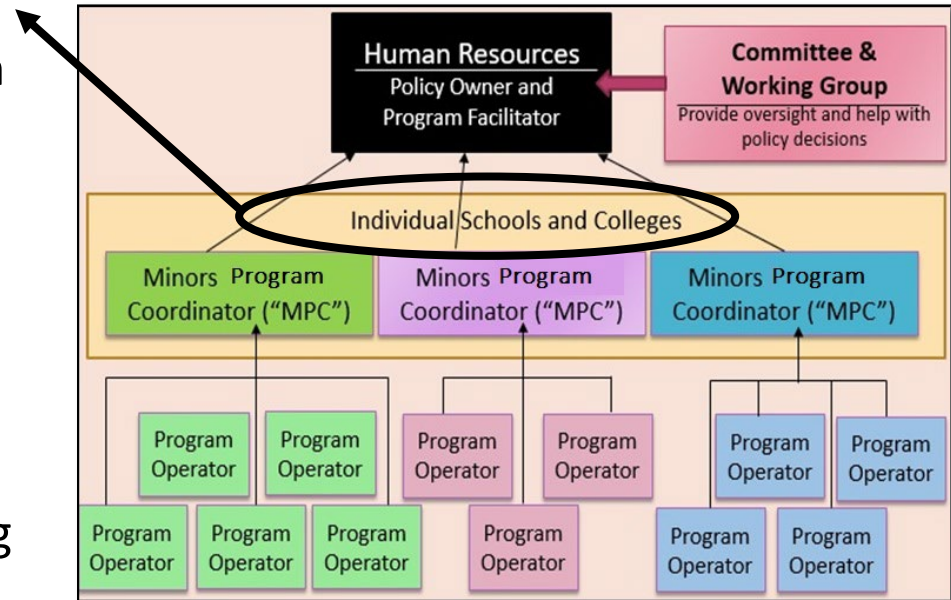
Structure of Minors Protection at BU

School/College/Unit Roles and Responsibility established by the PoM Policy

Each school/college/unit that is sponsoring, operating, or participating in an on-or-off-campus programs involving minors is responsible for:

- ensuring that University faculty, staff, students, and volunteers who participant in programs that include Minors comply with all applicable aspects of this Policy and accompanying Procedures.

- designating a **Minors Program Coordinator (MPC)** to help ensure all University faculty, staff, students, and volunteers who participant in programs that include Minors comply with all applicable aspects of this Policy and accompanying Procedures.



Structure of Minors Protection at BU

MPC Roles and Responsibility established by the PoM Policy



- Appointed by a Dean or Administrative head as the liaison for all Minor programs in your school/college/unit/department
 - Serves as the main point of contact for any Program Operators who are running Minor programs in your school/college/unit/department
 - Works with other PoM partners at BU to ensure all aspects of your programs are covered appropriately and the Policy requirements are followed
 - Should develop partnerships with other MPCs to create best practices across Boston University

The MPC is “primarily responsible for coordinating” the area’s obligations pursuant to the Protection of Minors Policy, which includes reporting to Human Resources on the number of minors programs under their purview, the contact information for the Program Operators for each program, and other information including the number of minors in the program and the program duration. Human Resources maintains an inventory of this information.

Structure of Minors Protection at BU

MPC Roles and Responsibility established by the PoM Policy

Primary Duties of the MPC



- Determine if the POM policy applies to each program
- Manage and update each program's information with HR
- Review Third Party agreements if applicable
- Process background checks & PoM training requests for all BU personnel who will be interacting with Minors
- Ensure all BU personnel receive PoM training prior to interacting with minors
- Ensure waivers of liability are completed by parents/guardians of all Minors
- Track compliance and maintain records

Structure of Minors Protection at BU

Program Operator Roles and Responsibility established by the PoM Policy

Responsibilities of the Program Operators

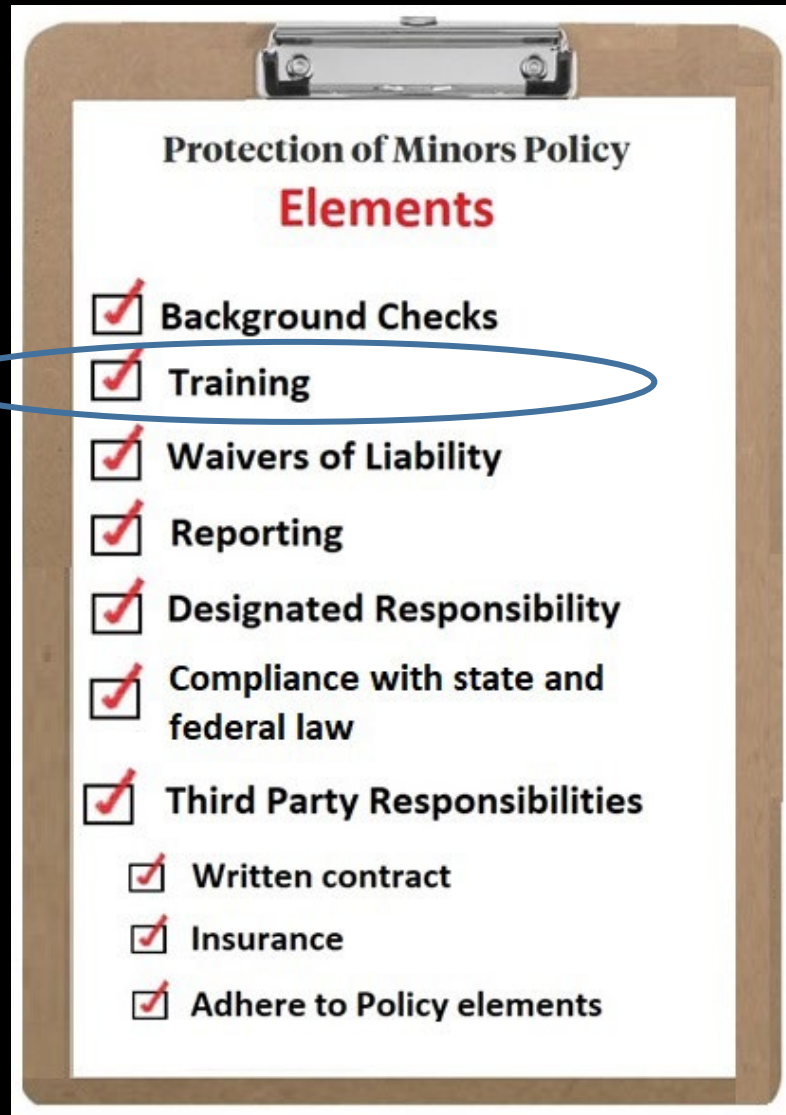


- Any new or existing program involving minors must be brought into compliance with the POM Policy. Compliance with the Policy and Procedure elements is the responsibility of each Program Operator.
- Policy elements include: Reporting, background checks, training, waivers, submitting information about the program and documenting compliance with the requirements of the Policy and Procedure and any applicable Federal or State Laws, and Compliance with Federal and State Laws*

* Federal and State Laws include, but are not limited to, the Massachusetts Minimum Standards for Recreational Camps for Children, 105 CMR 430.00, the Massachusetts Mandated Reporter law, M.G.L. c. 119, § 51A, and the Massachusetts Department of Early Education and Care regulations

Elements of Minors Protection at BU

Core Elements of the Protection of Minors Policy



Specific training requirements based on participants role in the PoM program

- MPC
- Program Operator
- Program Participants

Elements of Minors Protection at BU

Role-based Training Requirements

All individuals participating in minors programs and interacting with minors must receive training. The type(s) of training required depends upon an individual's role.



Types of Trainings

United Educators Training

- ❑ Customized, interactive online course that covers:
 - Guidelines for interacting with minors; Warning signs for abuse or neglect; and How to report suspected abuse or neglect
 - Takes 30 minutes to complete

Commonwealth of Massachusetts Presentation iCORI General Training For Individuals

- Introduction to the CORI, including what it is, how the CORI record is created, and more

This Minors Program Coordinator Training, aka "MPC Training"

Elements of Minors Protection at BU

Policy Requirement: Role-based Training

All individuals participating in minors programs and interacting with minors must receive training. The type(s) of training required depends upon an individual's role.



MPC's must complete the following trainings:



- This MPC training
- United Educators Training
- [Commonwealth of Massachusetts Presentation](#) on Background Checks

Elements of Minors Protection at BU

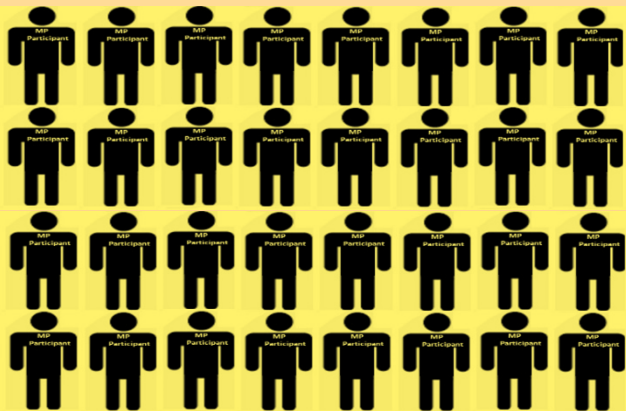
Policy Requirement: Role-based Training

Program Operators must complete the following trainings:



- The United Educators Training on minors protection
 - Customized, interactive online course that covers:
 - Guidelines for interacting with minors; Warning signs for abuse or neglect; and How to report suspected abuse or neglect
 - Takes 30 minutes to complete
- The [Commonwealth of Massachusetts Presentation](#) on Background Checks IF they are involved with background checks processing

Minors Program Participants must complete the following training:



- The United Educators Training on minors protection
 - Customized, interactive online course that covers:
 - Guidelines for interacting with minors; Warning signs for abuse or neglect; and How to report suspected abuse or neglect
 - Takes 30 minutes to complete

Elements of Minors Protection at BU

Policy Requirement: Role-based Training

Any individuals processing background check documents:

- The [Commonwealth of Massachusetts Presentation](#) on Background Checks IF they are involved with background checks processing
- Be familiarized with the [Background Check Authorization Process](#)



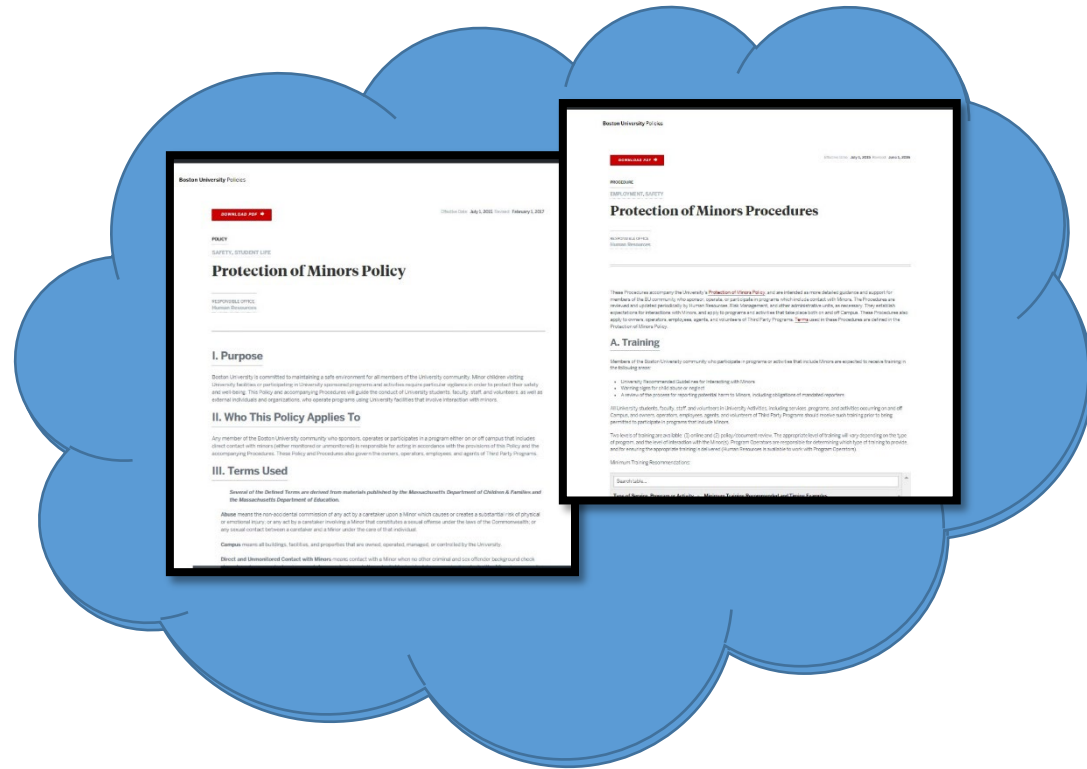
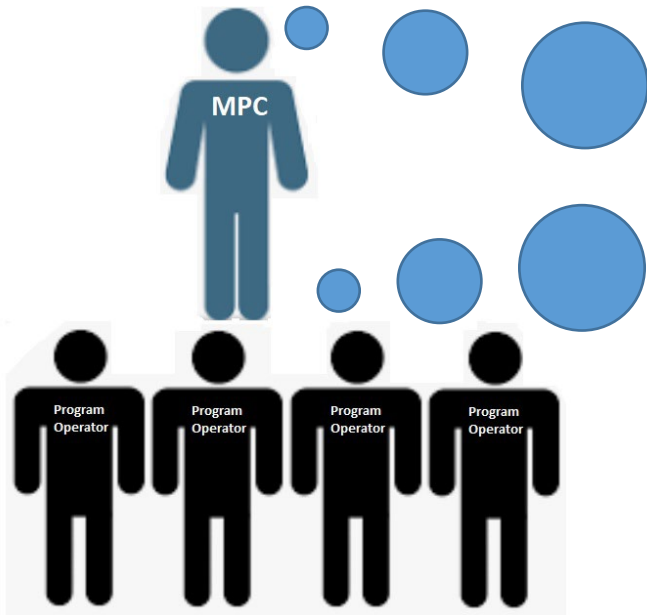
Documenting Completion: To confirm United Educator Training Completion, ask that the training participants save the completion certificate that appears upon module completion.

More information on the Background Check process can be found on the [BU Safety website](#), and the [BU SharePoint site](#).

Elements of Minors Protection at BU

Policy Requirement: Role-based Training

In addition to the individual trainings, MPCs and Program Operators should be **extremely familiar** with the Policy and Procedure.



Elements of Minors Protection at BU

Core Elements of the Protection of Minors Policy



Background Checks

Protection of Minors Policy Elements

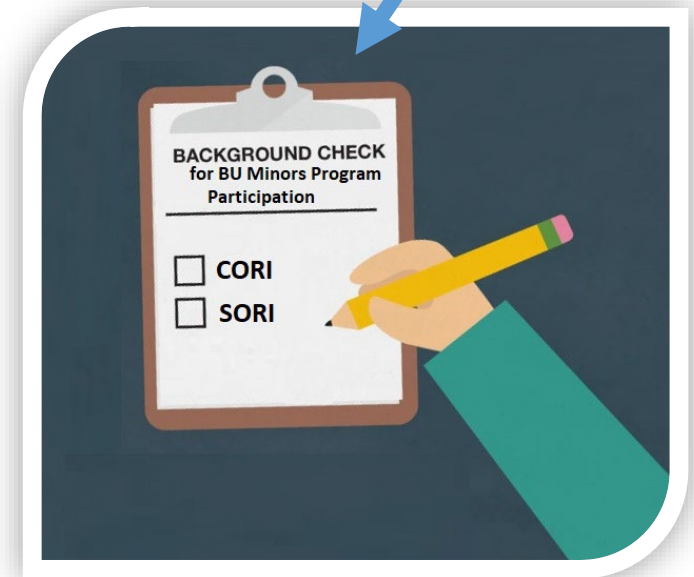
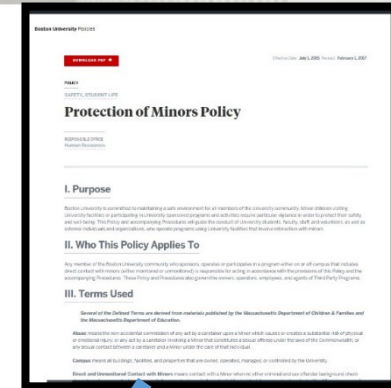
- Background Checks
- Training
- Waivers of Liability
- Reporting
- Designated Responsibility
- Compliance with state and federal law
- Third Party Responsibilities
 - Written contract
 - Insurance
 - Adhere to Policy elements

What checks need to be run, on whom, and how frequently?

Elements of Minors Protection at BU

Policy Requirement: Background Checks for Risk Mitigation

- The PoM Policy **requires Background Checks** (criminal and sex offender CORI/SORI checks) for all for BU community members participating in BU activities that include minors, including Program Operators, and Minors Program participants.
- Background checks are processed and managed through our third party vendor Creative Services, Inc. (CSI).
- To access more information on the specific procedures and forms required to process background checks, including required forms, refer to the [BU Protection of Minors SharePoint site](#).



Elements of Minors Protection at BU

Policy Requirement: Background Checks for Risk Mitigation

The Frequency of Background Checks depends upon the role of the minors program participant. The PoM Procedure establishes the required frequency as follows:



Category	Frequency of Background Check
Boston University Student – Full-time or part-time matriculated	Every 3 years
Boston University Student – Part-time non-degree	Annually
Faculty/Staff Full-time	Every 3 years
Faculty/Staff Part-time	Annually
Volunteers (excluding BU faculty, staff and students)	Annually

Elements of Minors Protection at BU

Core Elements of the Protection of Minors Policy



Waivers of Liability

Protection of Minors Policy
Elements

- Background Checks
- Training
- Waivers of Liability**
- Reporting
- Designated Responsibility
- Compliance with state and federal law
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 - Written contract
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 - Adhere to Policy elements

Signed forms from the parent or guardian specific to the activity the minor will participate in

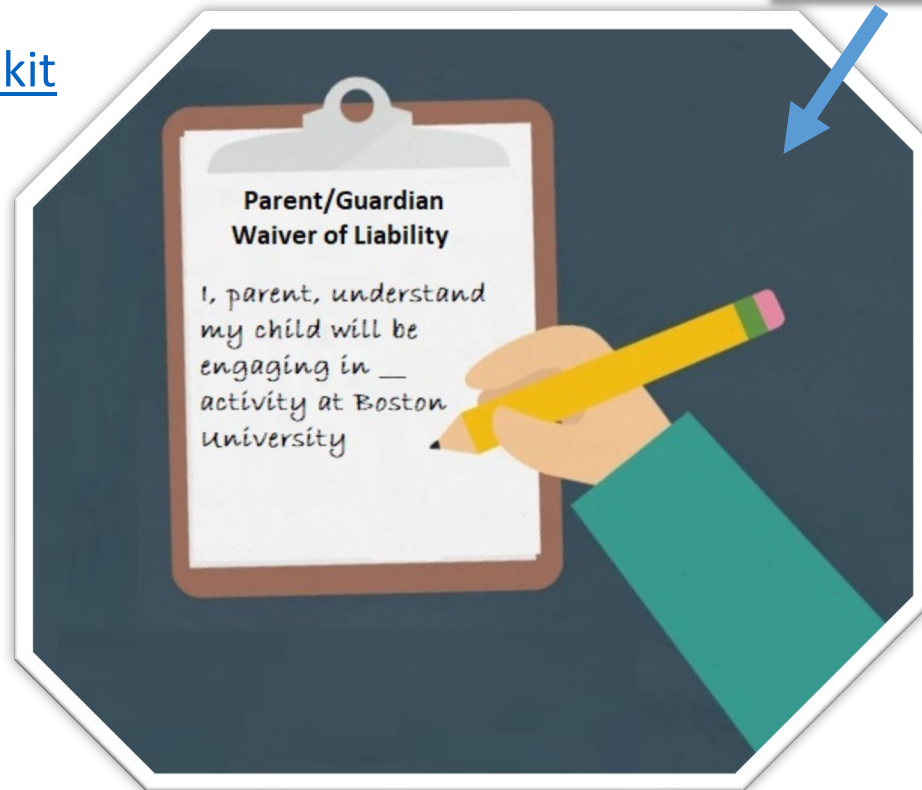
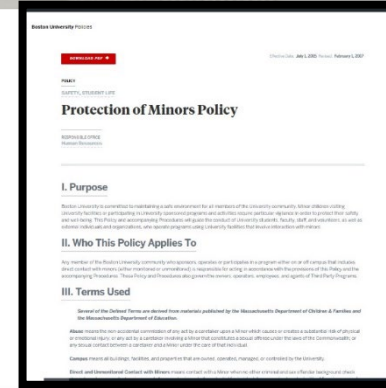
Elements of Minors Protection at BU

Policy Requirement: Waivers of Liability for Risk Mitigation

The PoM Policy **requires Waivers of liability** signed by parents/guardians of all Minor Program participants; notice to the parent of the activity (or activities) is a key component to the waiver.

➤ See page 14 of the [MPC Toolkit](#) for a sample waiver

Work with HR to determine if the waiver should be reviewed by OGC or Risk Management



Minors Protection at BU

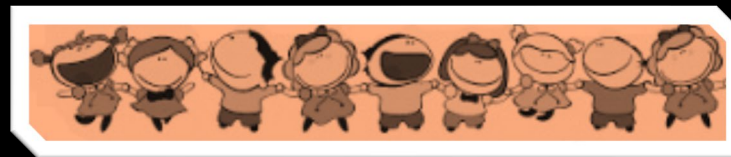
Other Key Considerations



Recordkeeping



**Important BU
Contacts and
Resources**



**Guidelines for
Working with
Children**

Elements of Minors Protection at BU

Other Considerations - Recordkeeping

MPCs and Program Operators should establish an **internal tracking system** for program staff and anyone else who will have unsupervised interaction with unaccompanied minors in the program, including background checks.

Program Operators need to maintain a record of program participant training and background check completion, and need to maintain general program records and minors participants waivers of liability.

Records indicating POM compliance must be kept in perpetuity because of the related statutes of limitation.

→ Programs need to be able to demonstrate Policy and Procedure compliance through recordkeeping.



Elements of Minors Protection at BU

Other Considerations - Recordkeeping

MPCs and Program Operators need to maintain information on the minors programs within their purview, including at least:

- Program Name
- Primary Program Contact Name & Email
- BU Program? (Yes/No)
- # of Minors Involved
- Residential? (Yes/No)
- Age Range of Minors
- #/Frequency of Sessions
- # of Program Staff
- Any other relevant info about the program



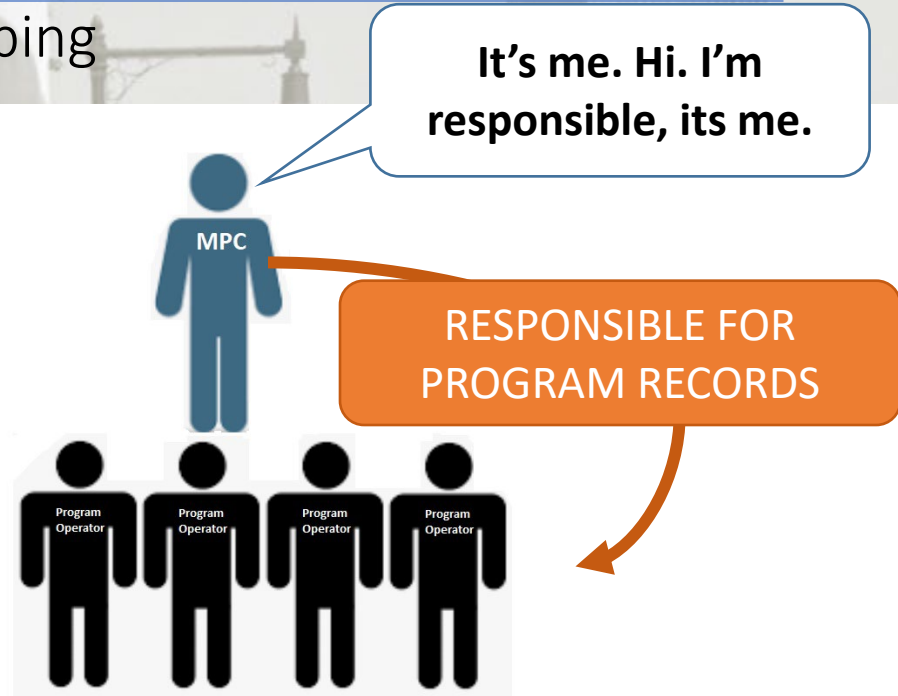
Information on Minors Programs must be reported at least annually to HR for keeping in a central U-wide database of Minors programs. This helps us track statistics on minors programs.

Elements of Minors Protection at BU

Other Considerations - Recordkeeping

Who is Responsible for Recordkeeping?

Minors Program Coordinator(s) of each school, college, or administrative unit are responsible for maintaining a central repository of records for the programs within their purview.

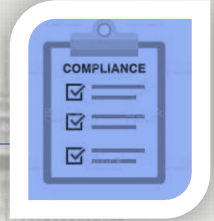


Types of Records that should be maintained by MPCs:

- Lists of personnel who have had CORI/SORI completed, and the date(s) of that check
- parent/guardian waiver of liability forms
- staff training completion records
- training registration and attendance records if in-person training was conducted
- documentation of reports of known or suspected abuse or neglect
- relevant records of third-party programs involving minors (contracts and proof of insurance).

Elements of Minors Protection at BU

Other Considerations - Recordkeeping



What SHOULD NOT be kept?

The background check forms completed in order for the CORI/SORI to be processed should not be retained given the sensitive nature of these records. After background check paperwork is processed, the forms should be shredded.

Schools/colleges/administrative units should only maintain a list of individuals who have been checked and when the check was completed. The other records related to CORI/SORI checks should be shredded.

Note on Third Party Records:

The only third party record minor records that should be maintained by BU are the contracts and proof of insurance. All other records showing compliance with the Minors Policy (waivers, background check records, training records) are the responsibility of the third party, and that third party must retain those records.

HR Records:

HR, as the “owner” of the PoM Policy, are responsible for maintaining program administration records, like the annual inventory and list of MPCs.

Elements of Minors Protection at BU

Recommended Guidelines for Interacting with Minors – prepared by HR



- Avoid any physical contact with minors that could be misinterpreted; back rubs, massages, tickling, rough-house play, and caressing or intimate touching is inappropriate and unacceptable.
- Do not take photographs of children for personal use.
- If staff is given photographs of children, do not post them on social networking sites or publish them in any other form. Families should give written consent to a program/activity operator before any photographs of their child can be used or published publicly.
- If it is necessary to take a minor aside for a private conversation relating to behavior or some other issue s/he wants to discuss, do so in full view of other people, or in the presence of a second adult. If you hold office hours, leave the door open when you are meeting with a minor in your office.
- During conversation, avoid disclosing intimate information about yourself or seek to learn intimate information about the minor, particularly about sexual behavior.

Elements of Minors Protection at BU

Recommended Guidelines for Interacting with Minors – prepared by HR



- Use words with care: never berate, harass, intimidate, degrade, or belittle a child.
- Issue praise appropriately, and avoid excessive praise or criticism of any minor
- Do not tell sexually-oriented or off-color jokes to or in the presence of minors.
- Remember that young children interpret information in concrete ways and typically do not understand idioms or abstract language. Using concrete language will help to avoid any misinterpretations or confusion on the part of the minor.
- **Report all instances of suspect child abuse or neglect.** Report to your immediate supervisor or program director, AND submit a report to BUPD. The reporting form can be found here: <http://www.bu.edu/safety/protecting-minors/reporting/>. Mandated reporters include:
 - Any University faculty, staff, student, or volunteer participating in a University activity
 - Any owner/operator, employee, volunteer, or agent of a third-party program
 - Campus security authorities, under the Jeanne Clery Disclosure of Campus Security Policy and Campus Crime Statistics Act
 - Minors program coordinators
 - Title IX coordinator and deputy coordinators

Elements of Minors Protection at BU

Recommended Guidelines for Interacting with Minors – prepared by HR

Warning Signs of Abuse

Physical Abuse

- Bruising, welts, or burns that cannot be explained
- Withdrawn, fearful or extreme behavior
- Injuries where children do not usually get injured (i.e., torso, back, neck, buttocks, thighs)

Emotional Injury

- Speech disorders
- Inability to play as most children do
- Sleeping problems
- Anti-social behavior or behavioral extremes
- Delays in emotional and intellectual growth

Sexual Abuse

- Difficulty walking or sitting
- Pain or itching in genital area
- Torn, stained, or bloody underclothing
- Frequent complaints of stomachaches or headaches
- Feeling threatened by physical contact
- Inappropriate sex play or premature understanding of sex
- Frequent urinary or yeast infections

Neglect

- Lack of medical or dental care
- Chronically dirty or unbathed
- Lack of proper nutrition
- Lack of adequate shelter
- Self-destructive feelings or behavior
- Alcohol or drug use

Protection of Minors Contacts



- Training instructions
- Training completion reports
- Updating program information or PoM contacts
- General minors program guidance
- Policy interpretation
- Access to the [SharePoint Site](#)

HR Protection of Minors,
pom@bu.edu

- Background Checks

- HR Protection of Minors, pom@bu.edu
and/or
- Vendor - Creative Services Inc. “CSI”

- Third Party insurance
- Requests for policy exemption
- Waivers of liability

Office of Risk Management, riskhelp@bu.edu,
617-353-3020

- Third Party agreements

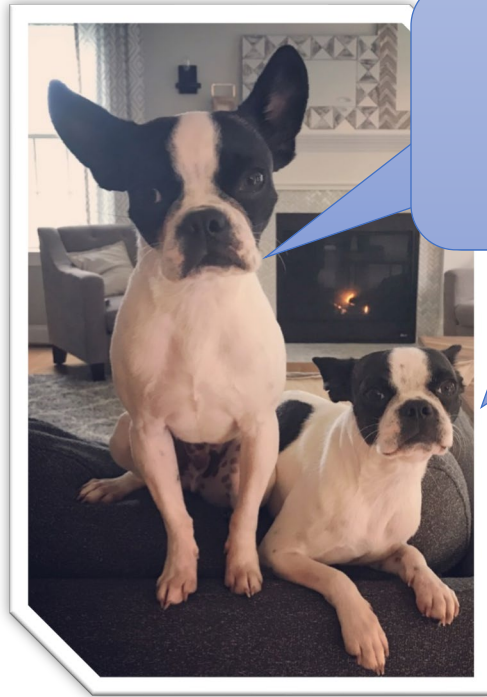
- Office of the General Counsel (OGC), 617-353-2326,
buogc@bu.edu
- Office of Risk Management, riskhelp@bu.edu, 617-353-3020

Protection of Minors Resources



- **BU [Protecting Minors Safety Website](#)** –Includes specific pages with resources on [Background Checks](#), [Training](#), [Reporting](#), and includes link to the PoM Policies and Procedure
 - [Protection of Minors Policy](#)
 - [Protection of Minors Procedures](#)
 - [Policy on Minors in Laboratories](#)
- **BU [Policies Site](#)**
 - www.bu.edu/policies (search “Protection of Minors”)
- **PoM [SharePoint Site](#)**
 - Email pom@bu.edu for access
 - Background Checks Process, Forms and Information, available via [Homepage](#)
 - [2022 Program Inventory](#)
 - [Instructions to Access to United Educators Online Training](#)
- **MPC Toolkit**
 - PDF document with resources, forms, documents needed for MPC role
 - Available on SharePoint POM Site
 - Most recent Toolkit version is available [here](#)

Protection of Minors Training



Any questions?