UNH Procedures for the Protection of Minors  
(approved May, 2014)

The University of New Hampshire is committed to providing a safe environment for all persons, including but not limited to children, and to prevent abuse, neglect and crimes against children.

A. Recommended Staff to Participant Ratios:

Programs will set an adult to child ratio, depending on the ages and needs of the population served, and considering the program setting:

Overnight Camps and Programs for Minors: at least
- one staff member for every five children ages 4 and 5;
- one staff member for every six children ages 6 to 8;
- one staff member for every eight children ages 9 to 14;
- and one staff member for every 10 children ages 15 to 17.

Day Camps and Programs for Minors: at least
- one staff member for every six children ages 4 and 5;
- one staff member for every eight children ages 6 to 8;
- one staff member for every 10 children ages 9 to 14;
- and one staff member for every 12 children ages 15 to 17.

- Additional adult personnel may be needed for minors with special needs.
- Programs held in classroom and instructional settings may require fewer adults.

B. Recruitment, selection, screening and placement of staff serving minors

The Youth Program Manager or designee shall oversee the recruitment, training, and supervision of UNH staff and at a minimum meet the following criteria:

B.1 Training for UNH Youth Program Managers: Managers (or their designees) of UNH programs that serve minors shall be trained by a designated UNH training team in the procedures to recruit, interview, screen, check references, and assess candidates for positions that will have unsupervised access to minors or will be responsible for minor children. UNH shall provide training for youth program managers on an ongoing basis.

B.2 Recruitment for UNH Youth Programs: Employment or volunteer opportunity postings and position descriptions for all UNH positions shall include the following language, whenever revised or posted:

“The University of New Hampshire is committed to providing a safe environment for all persons, including but not limited to children, and to prevent abuse, neglect and crimes against children. All UNH Staff Serving Minors with unsupervised access to children shall be required to attend job specific training on child safety, and shall be subject to periodic criminal records checks.”
B.3 Application for employment or volunteer opportunity: any candidate for a position with direct responsibility for minors must complete a written or online UNH application. The application will notify applicants that they will be required to consent to a criminal background check if offered a position.

B.4 Interviewing Procedures: Candidates for UNH positions where staff will be directly responsible for minors shall be questioned about their ability to work safely around children, and shall be informed of UNH’s screening process, as outlined below in B. 7

B.4.1 Candidates for UNH positions where staff are primarily responsible for minor children should attend at least one in-person interview with the hiring manager, if possible. Candidates shall be questioned about their ability to work safely around children, to follow rules, establish safe boundaries around children, and properly supervise children and shall be informed of UNH’s screening process (see B.7 below).

B.4.2 Suggested interview questions for candidates for positions with primary responsibility for minors:

- Why do you want this job? What is your past experience working with children? Why do you want to work with children?
- What type of supervision do you prefer to work under?
- Has there ever been a time when you disliked a policy at work? How did you react?
- Describe your style of working with children.
- What age/gender of youth do you want to work with? How would you feel about working with a different group?
- Is there anyone who might suggest that you not work with children? Why or why not?
- What makes you a good candidate for working with youth?
- How do you maintain clear boundaries with youth?
- What hobbies or activities do you enjoy?
- Describe a typical problem with a youth, ask how the candidate would approach it.

B.5 Reference Checks – UNH Youth Program Managers shall check at least 2 references for each finalist for UNH positions where staff will be primarily responsible for minor children:

- Obtain verbal references to elicit more information about the candidate.
• Match references with the employment/volunteer history to see if all supervisors are listed, and ask for a reference from a past employer if missing.
• Personal and professional references should be checked.
• If a former employer will only verify dates and titles of the candidate, ask if this is due to company policy. Request to speak with anyone who can provide more information about the candidate’s work there.

The following are recommended questions to use in checking references, in addition to position-specific questions:

• How would you describe the personal characteristics of the applicant?
• How does the candidate interact with youth?
• Why would this person be/or not be a good working with youth?
• Have you seen the candidate discipline youth (other than his/her own children)? Describe how the discipline was given.
• Would you hire this person again?
• Would you want this person to be responsible for your own children?

B.6 Assessment of Candidates – All concerns about an interviewed candidate’s suitability to work safely with minors shall be discussed between the UNH Youth Program hiring manager and their supervisor. UNH HR can provide support in this area.

B.7 Screening of UNH staff directly responsible for minors-

B.7.1 UNH shall perform criminal record background checks on newly hired and current faculty, staff or volunteers who are primarily responsible for minors, in accordance with NH State Law.

B.7.2 Criminal Record checks shall be repeated every 3 years after the initial check, as long as there was no break in service. The Youth Program Manager is responsible for keeping records of which staff in their program have been checked, and for initiating rechecks every 3rd year on currently employed staff.

B.7.3 Results with any convictions of crimes against children or sex offenses shall be verified, and if accurate, shall be grounds for not hiring a candidate, or for a current staff to be dismissed from a UNH position serving minors. Managers shall consult with UNH HR on these or any other convictions. UNH’s current policy on background checks and the rights of the employee or candidate under the Fair Credit Reporting Act are at: http://www.unh.edu/hr/background_checks-procedures.htm
B.8 Hire Letters or Volunteer Acceptance Letters – All hire letters for employees or service letters for volunteers for any position with unsupervised access to youth or with primary responsibility for youth shall include this language:

“The University of New Hampshire is committed to providing a safe environment for all persons, including but not limited to children, and to prevent abuse, neglect and crimes against children. UNH Staff serving minors with unsupervised access to children shall be required to attend job specific training on child safety, and shall be subject to periodic criminal records checks. This offer of employment/volunteer service is contingent upon a satisfactory record check.”

B.9 New hires/rehires and volunteers shall receive a copy of the UNH Policy and Procedures for the Protection of Minors.

C. Responding and Reporting Incidents of Child Abuse or Neglect

The University of New Hampshire is committed to providing a safe environment for all persons, including but not limited to children, and to prevent abuse, neglect and crimes against children. UNH staff (including employees and volunteers) shall be trained and shall respond quickly and appropriately to:

- Reports, evidence or suspicion of child abuse that happened within a UNH program or facility
- Reports, evidence or suspicions about child abuse that may have happened outside of a UNH program
- Other infractions of UNH’s Policy for the Protection of Minors

C.1 Procedures for Reporting Suspected Child Abuse or Neglect

UNH staff serving minors with reason to suspect abuse or neglect of a child participating in a UNH program shall immediately follow the Procedures outlined below. UNH staff shall follow all applicable State of New Hampshire laws and procedures in any case of child endangerment. UNH staff members do not need to determine if abuse or neglect have occurred: that is the responsibility of State child welfare officials. Definitions of abuse or neglect are found in NH RSA 169-C:2, as amended.
UNH Youth Program Managers shall be trained on how to handle:

- Evidence or reports from a child about abuse that happened within the UNH program
- Evidence or reports from a child about abuse that happened outside of a UNH program
- Inappropriate or harmful behavior within a UNH program or facility towards or among children
- Violations of the UNH Policy for the Protection of Minors by a UNH staff member

C.2 Reporting an incident when the suspected child abuse, neglect or other unsafe behavior has occurred during a UNH program:

C.2.1 The safety of the child is the primary concern. If the child is physically harmed in any way, as a result of suspected abuse or neglect, UNH staff shall call 911 for medical response. If there is any immediate and present danger, contact law enforcement.

C.2.2 The UNH staff member responsible for the child shall immediately act to protect the child and separate the child from the person alleged to have caused such abuse, and notify other UNH staff to assist as needed.

C.2.3 The UNH staff member shall report any information related to suspected abuse or neglect - immediately or as soon as it is safe - to the appropriate UNH Youth Program Manager, or designee. The information may include: observations of abuse, disclosures about abuse (note the child’s own words whenever possible), and behaviors the child has exhibited.

C.2.4 While reporting is in progress, UNH staff shall work towards the continued emotional and physical safety of all other children in their care, while keeping the situation as confidential as possible.

C.2.5 The UNH Youth Program Manager or designee shall take the following steps to report to the proper state child welfare authorities:

a. The UNH staff who worked most closely with the child, in the presence of the UNH Youth Program Manager, should contact the local state Child Abuse/Neglect Reporting Hotline as listed (See Resources). If the suspected abuse or neglect occurred outside of a UNH program, one of the
major concerns will be the safety of the child when returning home. Submit a written report if instructed by the counselor on the hotline.

b. After a report is made, the UNH Youth Program Manager should document and follow all instructions given by the Child Welfare authorities. Notes shall be kept confidential, to the extent possible.

c. The UNH Youth Program Manager shall then follow procedures outlined in their department’s Emergency Plan, keeping the incident as confidential as possible.

d. The UNH Youth Program Manager shall document the incident in a confidential report to the department director. Depending on the incident, the director will share with Provost’s Office, HR, or USNH Legal Counsel.

e. Contact with the parent or guardian of the child involved shall be established by the UNH Youth Program Manager, as soon as possible after the incident is reported.

C.2.6 If a UNH employee or UNH volunteer is suspected of having committed the abuse/neglect, then he or she shall be immediately removed from working with children by the Youth Program Manager or his/her designee until an investigation is completed and a final determination is made. Youth Program Managers shall consult with HR.

Reinstatement of staff shall occur only after all allegations have been cleared to the satisfaction of the appropriate UNH Department Manager and Chief Human Resources Officer. Any subsequent action regarding any inappropriate or unlawful actions by a UNH employee shall be taken in accordance with UNH policy. The UNH department sponsoring the program may take action to dismiss a volunteer according to program policies.

C.3 Reporting an incident when the suspected child abuse or neglect has occurred outside of UNH programs:

If a UNH staff member is informed, or otherwise learns, that a child who is participating in a UNH program may be suffering physical or emotional injury resulting from abuse/neglect which occurred outside of the UNH program:

C.3.1 The safety of the child is the primary concern. If the child is physically harmed in any way, UNH staff shall call EMS for medical response if needed.
C.3.2 The UNH staff member shall immediately, or as soon as safely possible, inform the appropriate UNH manager. If that person is not available, then the staff shall contact the UNH Police Department.

C.3.3 If it is suspected that a child has suffered any abuse outside of the UNH program or facility, the UNH Youth Program Manager or designee shall take the following steps to report to the proper state child welfare authorities:

a. Contact the State of NH child abuse reporting hotline or that of the state where the incident took place (see attached list). The UNH staff who worked most closely with the child, in the presence of the UNH Youth Program Manager, should confidentially call the child’s home state or province Child Abuse/Neglect Reporting Hotline as listed. If the suspected abuse or neglect occurred outside of a UNH program, one of the major concerns will be the safety of the child when returning home. Submit a written report if instructed by the counselor on the hotline.

b. After a report is made, the UNH Youth Program manager should document and follow all instructions given by the child welfare authorities. Notes shall be locked and kept as confidential as possible.

c. The UNH Youth Program manager shall then follow procedures outlined in their department’s Emergency Plan, keeping the incident as confidential as possible.

d. The UNH Youth Program manager shall document the incident with their department director or chair, HR and the UNH Youth Summer Program Coordinator.

D. Responding to inappropriate or harmful behavior within a UNH program or facility towards or among children, or infractions of the UNH Policy for the Protection of Minors

D.1 Incidents that occur on a UNH program that are of concern but do not meet the definitions of Abuse or Neglect in NH RSA 169-C:2 shall be addressed and managed by the specific UNH Youth Program Manager.

Examples -

A minor or UNH staff member using profanity or telling explicit jokes

A minor using tobacco within a UNH program

Minors engaging in any kind of sexual activity with each other

Bullying between participants
Any incident of inappropriate behavior shall be noted in writing by the UNH staff witnessing the behavior and discussed with the UNH Youth Program Manager and with UNH Human Resources if a staff member is involved. Disciplinary action for UNH employees will be according to USNH’s Personnel Policies. A minor may be dismissed from a UNH Program for violations of the UNH Policy for the Protection of Minors, these Procedures, or other camp/program rules.

E. Record Keeping –

E.1 Attendance Records of minor children participating in UNH programs where registration is required shall be kept for a minimum of 7 years past the 18th birthday of each minor.

E.2 Incident reports relating to abuse or neglect of minors in UNH programs shall be kept in a confidential file for a minimum of 7 years past the 18th birthday of the involved minors.

F. UNH Child Safety Program Guidelines

In order to maintain a safe environment for all minors (under the age of 18) involved in UNH sponsored programs, all UNH staff and all staff subcontracted by UNH must behave towards children with a high level of professionalism.

At a minimum, this includes ensuring for all children attending a UNH program:

- Their physical and emotional security
- Their safety during indoor and outdoor activities
- Their safety while on UNH property
- That any allegation of abuse or neglect of a minor be reported appropriately in compliance with state law and UNH Policy and Procedures for the Protection of Minors.

F.1 Physical and Emotional Security Prohibited Actions:

In order to ensure physical and emotional security, a UNH staff member or an employee subcontracted by UNH must never:

- Treat children abusively: in such a way as to cause physical or emotional harm
  Examples are yelling, striking, threatening or humiliating behavior
- Touch students inappropriately: in such a way as to imply sexual or romantic intent
- Establish personal contact with students through social media or other means – before, during or after the conclusion of a program
• Exhibit favoritism towards one or more participants
• Spend time with a child alone and/or behind closed doors, or out of sight of others, unless required by the program and approved by the child’s parents. Consideration must be given to the safety of the child and the staff when 1:1 interactions are necessary. Small groups are preferable to private lessons. Where 1:1 interactions are required, steps shall be taken to reduce risk, e.g. monitoring by another adult, using rooms with glass doors/windows, or asking a chaperone or parent to accompany the child.
• Shower, change clothes, or otherwise expose themselves where children are present
• Discuss intimate personal issues or their own personal sexual history
• Discuss any adult topics (sex, substance abuse, etc.) around children, unless specifically trained to do so or in connection with a sanctioned program

F.2 Program Management: In order to ensure the safety of minors, any UNH program providing direct service to minors shall establish best practices for program management, including at least:

F.2.1 Indoor Activities -

a. Establish and review participant expectations with program participants
b. Monitor all non-program personnel who enter facilities used by minors; and supervise minor participants when in publicly used spaces
c. Make sure there are sufficient staff for supervisory purposes based on UNH procedures and ratios
d. Respond appropriately if students possess weapons or illegal substances of any kind, on their persons or in their rooms. Contact 911 or UNH Police for assistance
e. Make sure that program visitors follow all UNH policies
f. Forbid close physical play between minors and/or staff (i.e. water fights, tickling, nougies, wedgies, etc.)
g. Prevent students from “hanging out” in emergency exits, stairwells, or dorm rooms
h. Establish, explain, and post an action plan in case of fire or other emergency
i. Establish room assignments with gender appropriate adult chaperones on the same floors as students
j. Make sure students stay in their assigned rooms during overnight arrangements
k. Either accompany students throughout their campus movements or require them to use both crosswalks and the “buddy system” at all times
l. Establish limits for movement on campus; i.e., safe areas for them to visit and areas they should not visit unaccompanied by supervisory personnel
m. Only release students to adults so identified on a release form or by another method deemed safe and acceptable by the UNH Youth Program Manager, a program supervisor or director

F.2.2 Outdoor Activities - In order to ensure safety during outdoor activities, UNH staff who work directly with minor students must follow all applicable protocols for Indoor Activities, plus:

a. Monitor weather conditions to ensure it is safe to be outdoors and take appropriate precautions in the case of an unexpected weather “event”. Staff with groups in
outdoor areas should always be reachable by phone or two-way radio should weather warnings happen after groups begin using outdoor areas
b. When using any outdoor UNH property monitor the status (i.e. fields, trails, water areas) to ensure they are safe to use. If using athletic fields, monitor field conditions to ensure they are safe to play on
c. Monitor equipment to ensure it is working properly and all safety gear is available and being used properly
d. Monitor activities to ensure that the level of contact is commensurate with safety standards and level of training

F.2.3 Other safety considerations:

a. Program staff /volunteers should sign on to the University alert system to be notified immediately in the event of weather or other emergencies
b. Program staff members who drive students to or from any activity must have participated in the UNH Defensive Driving program and have a motor vehicle history check performed by UNH.
c. UNH Youth Program Managers shall establish expectations for program participant behaviors, and communicate these to minors and parents prior to registration, and review expectations for safety with participants at the start of the program

Expectations of participants may include:

i. Prohibition of sexual activity between youth
ii. No bullying or aggressive behaviors
iii. No swearing
iv. No harmful activity towards others or self
v. No use of tobacco products, alcohol or drugs during the program
vi. Procedure for taking prescription medications
vii. Procedure for runaways or lost children
viii. Emergency procedures
ix. Use of personal computers, devices and cell phones
x. Curfew hours

F.2.4 Additional safety topics for training of UNH Youth Program Managers and staff may include:

a. Recognizing eating disorders and appropriate response
b. Procedures for administering prescription medications
c. Emergency procedures
d. Handling runaway or lost children
e. Intervention and resources for suspected harmful behavior (suicide, cutting, etc.)