

Sam Fox School of Design & Visual Arts
Programs Policy Regarding Minors

Purpose and Scope:

The purpose of this policy is to provide guidelines for staff and faculty working with minors (children under the age of 18) participating in Sam Fox School of Design & Visual Arts pre-college and/or special programs (i.e. Alberti). This policy is a supplement to the Washington University Policy Regarding Minors at Washington University; it does not change anything in the University policy, but rather, it adds particular requirements based on the specific needs and circumstances in the Sam Fox School programs. All staff and faculty working with minors in the Sam Fox School programs must adhere to these requirements, in addition to following the main Washington University policy. Throughout this policy “minors” are children under the age of 18 who are participants in a Sam Fox School of Design & Visual Arts program and “personnel” includes all faculty, staff, and program assistants working with the program.

Policy Requirements:

Contact with Students

We are committed to creating an environment for minors that is safe, nurturing, empowering, and that promotes growth and success. In critique, criticism should always be constructive. No form of abuse will be tolerated. Our programs will fully cooperate with authorities if allegations of abuse are made that require investigation.

General Contact:

1. Minors will be treated with respect at all times.
2. Minors will be treated fairly regardless of race, sex, age, or religion.
3. Personnel will maintain appropriate boundaries when in positions of power over minors.
4. Personnel will avoid isolated affection with minors that cannot be observed by others.
5. Personnel will not use profanity or tell off-color or sexual jokes.
6. Personnel will not engage in discussion with or in the presence of minors regarding sexual activity.
7. Personnel will not date or become romantically involved with minors.
8. Personnel will not have sexually oriented materials, including printed or online pornography, on program property or in the presence of minors.
9. Personnel will not have secrets with minors.
10. Personnel will not give gifts to minors, with the exception of group gifts given to all minors or in celebration of special events or recognition.
11. Personnel will never stare at or comment on minors’ bodies.
12. Personnel will always be fully and properly clothed with or in front of minors.

13. Personnel will comply with the program's policies regarding interactions with minors outside of the program.
14. Private living areas or bedrooms of personnel in the dormitories are not to be used for Washington University programs or by minors. All programmed and social gatherings should be held in public, common spaces. Personnel should not go into a minor's room, except in the event of an emergency or a necessary circumstance requiring staff to investigate or help (such as a minor being sick or having a prohibited substance in their room). Program events, social gatherings, advising, or one-on-one talks between personnel and minors must be held in common rooms or public spaces.
15. In the dormitories, private living areas or bedrooms of minors in a Washington University pre-college programs may not be used for social or program gatherings that involve members of the opposite sex. Minors of the opposite sex may not be in the same dorm room. Minors of the opposite sex may not be in a private space without the supervision of staff or faculty. Staff and faculty must enforce this policy at all times.
16. Personnel are prohibited from working one-on-one with minors in a private setting. Personnel will use public spaces when working with individual minors.
17. Personnel may never be alone with a minor in a private or closed room. This applies to studio monitoring. Individual academic reviews, any form of individual advising, interview, counseling, or discipline done by faculty, staff, or administration must be done in a public space or in an office where the door is left open.
18. Personnel will not abuse minors in any way, nor allow minors to abuse one another in any way, including (but not limited to) the following:
 - a. *Physical abuse*: hitting, slapping, unnecessary restraints
 - b. *Verbal abuse*: degrading, threatening, cursing
 - c. *Sexual abuse*: inappropriate touch, exposing oneself, sexually oriented conversations, any form of sexual activity
 - d. *Mental abuse*: shaming, humiliation
 - e. *Neglect*: withholding food, water, shelter
19. Minors are prohibited from engaging in the following:
 - a. Sexual Activity
 - b. Bullying
 - c. Derogatory name-calling
 - d. Games of Truth or Dare
 - e. Ridicule or humiliation
20. Personnel will report concerns or complaints about other personnel, other adults, or minors to the program administration.

Verbal Interactions

1. Personnel are prohibited from speaking to minors in a way that is, or could be construed by any observer, as coercive, intimidating, shaming, derogatory, demeaning, or humiliating. In the context of critique, criticism should always be constructive.
2. Personnel must not initiate or participate in sexually oriented conversations or discuss with minors their own sexual activities.

Electronic Communication

1. Electronic communication provides a venue for private communication between personnel and minors. Therefore, with electronic communication, our policy stresses transparency in all interactions.
2. Personnel are prohibited from communicating with minors using social networking websites including (but not limited to): Facebook.com, Twitter.com, MySpace.com, Instagram, Snapchat, Tumblr, Pinterest, or LinkedIn. Personnel on social networking sites may not request to be friends with minors or approve friend requests from minors.
3. All e-mail communications between personnel and minors should occur from an official Washington University e-mail address, and a copy of all e-mail communication must be sent to a supervisor. Personnel are prohibited from instant messaging with minors and from e-mailing minors using their personal e-mail accounts. E-mail communication must pertain to program-related issues or Washington University Admission information. If e-mails pertain to Admissions information, faculty and staff should copy the Sam Fox School of Design & Visual Arts Admissions Counselor on any email.
4. Faculty and staff may only communicate with minors via text and cellphone for program-related issues (an example would be texting or calling a student who did not show up to studio) during the duration of the program. Following the program, faculty and staff are not permitted to communicate socially with minors via text. If students have questions regarding the program, they should contact the administration via e-mail or phone, or they may communicate via e-mail with faculty and staff, according to the guidelines in point 3.

One-on-One Interactions

1. Most abuse occurs when an adult is alone with a child. Our policy aims to eliminate or reduce these situations and prohibits private one-on-one interactions unless approved in advance by a program administrator.

- a. Avoid physical affection that can be misinterpreted.
- b. If meeting in a room or office, leave the door open or move to an area that can be observed by others.
- c. Personnel may not be alone with a minor in a closed or private space.

Off-Campus Contact

1. Many cases of organizational abuse occur off campus. Contact outside of regularly scheduled activities may put program personnel, minors, and our university at increased risk.
 - a. Appropriate outside contact
 - i. Taking groups of minors on a program outing
 - b. Inappropriate Outside Contact
 - i. Taking minors on an outing outside of the program's scheduled events
 - ii. Visiting a minor in the minor's home, without a parent present
 - iii. Entertaining a minor in the home of program personnel
2. Following the conclusion of an official program session, there may be special circumstances in which personnel arrange a group reunion activity and have communication with minors. This may happen only with documented parental consent on behalf of the minor and with the permission and knowledge of the program director. An example of such an event would be a Program Assistant or other personnel meeting students at a museum or public place for a visit. With the consent of the minors' parents and Program Administration, personnel may e-mail, call, or text minors to make arrangements for an approved activity.

Appendix for Sam Fox School Special Programs

POLICY REGARDING MINORS AT WASHINGTON UNIVERSITY OR PARTICIPATING IN WASHINGTON UNIVERSITY PROGRAMS

Purpose and Scope:

The purpose of this policy is to provide for appropriate supervision of minors (children under the age of 18) participating in activities and programs taking place on Washington University property, in University owned or managed facilities, and under the exclusive authority and direction of the University in other locations. Failure to comply with this policy will be treated as a serious offense and could result in discipline, up to and including termination.

Patient care activities pertaining to minors are not within the scope of this policy.

More detailed guidance regarding the application and implementation of this policy is contained in the accompanying frequently asked questions document.

Policy Requirements:

Registration

The person in charge of a program or activity must register the program with the appropriate University office in sufficient time to meet the applicable portions of this policy.

Programs using University facilities, such as housing or dining services may be required to execute appropriate contracts.

Criminal Background Checks

The individual in charge of the program or activity, whether sponsored by the University or a separate person or entity, will be responsible for ensuring that program staff, paid or unpaid, including but not limited to faculty, staff, students, and volunteers who work directly with minors have successfully completed a criminal background check acceptable to the University's Office of Human Resources.

Background checks may not be required for individuals whose only contact with minors is in the context of a discrete, occasional event that is conducted entirely in public.

The University may require background checks and/or training for other members of the University community based solely on job responsibilities.

Required Training

All program staff working with minors are required to complete training regarding appropriate supervision and protection of minors before beginning their work with minors.

Behavioral Expectations

All members of the Washington University community, including program staff, are expected to be positive role models in their interactions with minors by behaving in a caring, honest, respectful, and responsible manner and must follow these expectations to avoid behaviors that could cause harm or be misinterpreted:

Do not engage in any sexual activity, make sexual comments, tell sexual jokes, or share sexually explicit material (or assist in any way to provide access to such material) with minors or in the presence of minors.

Do not engage or allow minors to engage you in conversations regarding romantic, sexual, or related matters, unless required in your professional capacity, such as resident advisor, mental health counselor, or health care provider.

Do not engage in any abusive conduct of any kind toward or in the presence of a minor, including but not limited to verbal abuse, striking, hitting, punching, poking, spanking, or restraining. If restraint is necessary to protect a minor or others from harm, all incidents must be documented and disclosed to the person in charge of the program and the minor's parent/legal guardian.

Do not use, possess or be under the influence of alcohol or illegal drugs while on duty or when responsible for a minor's welfare. Do not provide or in any way facilitate a minor's access to alcohol, illegal or prescription drugs, pornography, or gambling.

Do not contact minors outside of regular program activities, including through social media, without the express permission of the minor's parent or guardian.

Possession of or use of any weapon or explosive device is prohibited.

The individual in charge of each program is required to provide additional guidance regarding appropriate and inappropriate behaviors specific to the program. Examples of behaviors that should be addressed include but are not limited to, being alone with a minor, inviting minors to one's home, communicating electronically, and transportation of minors.

Report of Alleged or Suspected Abuse or Inappropriate Activity

Every member of the University community has an obligation to immediately report instances or suspected instances of child abuse or inappropriate interactions with minors. Refer to the policy regarding Reporting Suspected Child Abuse for additional guidance on this reporting obligation.

Policies Regarding Minors at Washington University or Participating in Washington University Programs and Requirements Regarding Reporting Suspected Child Abuse, Neglect, and Inappropriate Interactions with Minors

Frequently Asked Questions

Q #1: Why is the University establishing these new policies?

A: Like many other institutions across the country, Washington University is taking additional steps to protect minors who visit our campuses and to provide training for those faculty, staff, students, and volunteers who interact with minors while on University property or in the course of a program conducted by the University or University group.

Q #2: What does the policy regarding minors require?

A: This policy requires (a) that programs that bring minors to campus be registered with the University; (b) that program leaders, staff, and volunteers who may have close, one-on-one contact with minors participate in training programs; and (c) that these individuals also complete a criminal background check. The policy also includes behavioral expectations for all members of the University community who interact with minors on campus or in University programs or activities.

Q #3: Is the Policy Regarding Minors at Washington University or Participating in Washington University Programs University-wide Policy?

A: Yes. This policy applies to programs and activities offered by all schools and departments of the University, and by non-University groups using University facilities. Programs covered under this policy include, but are not limited to, athletic camps, academic programs, and other programs and activities intended for minors, regardless of the frequency or duration of program activities, and regardless of whether the program involves the housing of minors in University housing. Please review all of these FAQs to determine how the policy applies to a particular program.

Q #4: Are there programs and activities that are not covered by the Policy Regarding Minors at Washington University or Participating in Washington University Programs?

A: This registration, background check and training sections of the policy do not apply to programs exclusively offered to enrolled WUSTL students, even if some of the participants are minors.. Those requirements do not apply to events that are open to the general public (such as theater performances, sporting events, or carnivals) where parents or guardians are expected to provide supervision of minors in their care.

Patient care activities involving minors are governed by separate standards and are not within the scope of this policy.

Q #5: What's the definition of a minor?

A: A minor is considered to be anyone under the age of 18.

Q #6: What about programs that involve interaction with minors off-campus or away from the University?

A: If you are participating in a University sponsored or endorsed program that involves interaction with minors away from campus or other University-owned property, you may be

subject to these requirements or to similar requirements imposed by the agency or organization where the activity is being held. Check with your program leader/director if you are unsure.

Q #7: What types of programs need to be registered and how do I complete a registration?

A: Programs that involve repeated interactions with minors, or any opportunity for one-on-one interactions with minors who either come to the University or participate in a University Program must be registered. This does not include short visits to campus where the minor remains under the supervision of a parent, guardian, teacher or other responsible adult.

If you are participating in a student-sponsored program, contact the Community Service Office. If your program requires minors to stay overnight in University facilities, contact the Summer Conferences and Programs Office. All other programs held on or sponsored by those on the Danforth Campus should contact the Campus Card Services Office.

If the program is sponsored by the School of Medicine or located on the School of Medicine campus, contact the Medical School's Office of Human Resources.

Q #8: What type of training is required?

A: Program directors, or those with oversight responsibility for a program that brings minors to campus, must participate in a training program provided by the University's Human Resources Office. The first training session for program leaders will be held on Wednesday, May 29th. All program staff and volunteers must complete an online training program. Additional information regarding the online training will be posted on <http://card.wustl.edu>. The training provides helpful information on preventing and reporting suspected child abuse and steps that should be taken to protect the wellbeing of minors.

Q #9: When is a criminal background check required?

A: Individuals who work with minors in programs that involve repeated interaction with minors and /or who may interact with minors in non-public spaces must successfully complete a criminal background check. Examples of such programs include, but are not limited to:

- Athletic Camps
- Academic programs and workshops
- Other settings where one-on-one, unobserved or unsupervised contact with minors can occur

Q #10: How do I get a criminal background check?

A: For those programs on the Danforth Campus, the Campus Card Services Office is responsible for administering the required fingerprint based criminal background check. Contact this office at (314-935-8800) for the required paperwork and to arrange for payment of the required fee.

For programs within the School of Medicine, please contact the Medical School's Office of Human Resources.

Q #11: Who will have access to any information learned as a result of the criminal background check?

A: Criminal background check information is confidential. Only the Campus Card Services Manager or a representative of the Medical School Office of Human Resources will receive the information unless there is something that may be considered serious enough to prevent participation in a program with minors. In that case, the University's Vice Chancellor for Human

Resources will be consulted and will determine whether or not an individual's potential interaction with minors should be limited or prohibited.

Q #12: What if I already had a criminal background check for another reason?

A: The University requires a fingerprint based criminal background check of state and national criminal records and sexual offender registries. If you have had a criminal background check within the past twelve months and provide a copy of that report to the University, and it provides information required by the University, you will not be required to have another criminal background check conducted at this time.

Q #13: Once I have the required criminal background check, will I have to do it again every year?

A: If you have been continuously employed by Washington University or are a continuing student, a criminal background check will be required every three years. If you are not a Washington University employee or student, then annual criminal background checks are required.

Q #14: When isn't a criminal background check required?

A: Individuals who work with minors in the context of discrete, occasional programs that do not include one-on-one interaction in private settings or whose only contact with minors will occur in a group setting like a classroom, research lab, etc., do not need to complete a criminal background check. Examples of such programs include, but are not limited to:

- Field days for elementary children who are accompanied by a teacher, parent, or other responsible adult
- Tutoring or advising in group settings

Individuals who interact with minors in the context of a program organized and supervised by another entity do not need to complete a WUSTL criminal background check. Individuals participating in such programs are expected to meet all screening and training requirements imposed by that entity. Examples of such programs include, but are not limited to:

- Programs conducted in local schools

Individuals working at events that are open to the general public, where parents, guardians, or school teachers are expected to provide supervision of minors in their care do not need to complete a criminal background check. Examples of such programs include, but are not limited to:

- Thurtene Carnival
- Sporting events
- Theater or musical performances

Individuals working with minors who are enrolled as full-time Washington University students or students who have accepted the University's offer of admission by placing a deposit with the University are not required to complete a criminal background check.

In summary, a criminal background check will not be required if:

1. The program is a discrete event entirely conducted in public (this excludes programs with overnight stays or use of locker rooms).

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2. The program involves WUSTL personnel at an off-campus location that is organized and implemented by an outside entity with its own requirements regarding interactions with minors. Then the WU personnel involved must meet the requirements of the outside entity.

3. It is a program where the only contact with minors is in a group setting, such as in a classroom, research lab, etc.

4. The minors in the program are all WUSTL enrolled students or students who have accepted WUSTL's offer of admission by placing a deposit with WUSTL.

5. The program is open to the general public, where parents, guardians, or other caretakers such as teachers are expected to supervise minors in attendance, such as sporting events, lectures, carnivals, etc.

Q #14: What should I do if I am not sure whether a criminal background check is required?

A: You should evaluate your program in light of the explanations included in this Q&A. If you require additional guidance, contact Associate Vice Chancellor for Operations, Steve Hoffner at Steve_Hoffner@wustl.edu or Vice Chancellor for Human Resources, Ann Prenatt at aprenatt@wustl.edu.

Q #15: Are there things I can do to make it less likely for child abuse to occur?

A: Yes, there are several precautions you can take, and these are covered in the required training programs. For example, if you must have one-on-one contact with minors, try to do so in a public space rather than in a closed, private environment. Limit your contact with minors to professional interactions. Don't do anything to compromise your position as an adult role model. Any individual who is required to complete a criminal background check is required to complete the training described in Q#8, which includes more detailed information about preventing child abuse. Even if you are not required to complete a criminal background check, we encourage you to familiarize yourself with that training program

Q #16: What if I see or suspect a case of child abuse, neglect or inappropriate interactions with minors?

A: The University's policy regarding Reporting Suspected Child Abuse, Neglect, and Inappropriate Interactions with Minors states that every member of the University community has an obligation to immediately report instances or suspected instances of child abuse or inappropriate interactions with minors to either the Washington University Police Department (314-935-5514) or the Washington University School of Medicine Protective Services Department (314-362-4357), as well as the Vice Chancellor for Human Resources (314-935-7746). Reports may also be made anonymously to the Washington University Compliance Hotline (314-362-4998). You may also have a responsibility to notify the Missouri Child Abuse and Neglect Hotline at 1-800-392-3738. The University's policy can be reviewed at (insert link).

If you see something that you think may be inappropriate, or if you are unsure that a minor may be involved, report it, and let the University follow-up.