

TEACHERS COLLEGE

COLUMBIA UNIVERSITY

POLICY AND GUIDELINES
FOR THE SUPERVISION OF
MINOR CHILDREN ON CAMPUS

revised – August 15, 2018

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SUPERVISION OF MINOR CHILDREN ON CAMPUS

PURPOSE

While Teachers College (“the College,” “TC”) is committed to ensuring a safe and secure campus environment for all students, staff, and guests, the *Policy and Guidelines* (“the Policy”) are designed specifically for proper supervision of minor children when they are on campus.

EXECUTIVE SUMMARY

Teachers College hosts a wide variety of programs and activities that involve minor children on campus. Some of these programs are sponsored solely by the College (“College Sponsored Programs”), some are jointly sponsored by the College and an outside entity (“Co-Sponsored Programs”), and some are sponsored entirely by outside entities that have agreements to use College facilities (“Non-College Sponsored Programs”).

Among the College Sponsored Programs are long standing, internationally recognized education models such as the Hollingsworth Center and the Rita Gold Center; community engagement programs such as the Performing Arts Series, REACH (the Raising Educational Achievement Coalition of Harlem), Earth Friends; programs in support of local children beyond the classroom, such as the Institute for Urban and Minority Education (IUME) in Harlem, as well as a variety of summer camps. Non-College Sponsored Programs using College facilities range from one day events to programs that span several weeks.

Of the 40 plus programs or activities hosting minor children that occur annually on the College campus, some are regulated by the New York City Department of Education, some by the New York City Department of Health and Mental Hygiene, and some are not subject to specific state or city regulation. The Policy establishes requirements for the protection and supervision of minor children on campus. The Policy is applicable to all programs and activities hosting minors on campus, regardless of who is sponsoring them, and it is separate and distinct from any regulations or compliance obligations of oversight agencies.

The Policy provides direction in many areas of program operations including staffing/supervision ratios, access control and facility use, communication plans, medical emergency plans, transportation plans, insurance requirements, training, authorizations and releases, background checks, conduct, reporting abuse and maltreatment, and New York State mandatory reporting obligations. The Policy provides directions for registering a College Sponsored Program, and for applying to use College facilities for a Non-College Sponsored Program.

Every organization hosting minors on campus is required to comply with the *Policy and Guidelines for the Supervision of Minor Children on Campus*.

SCOPE

The Policy applies to all on-campus programs involving minors. It applies to College Sponsored Programs, Co-Sponsored Programs, and/or third party Non-College Sponsored Programs that take place on the academic campus.

The Policy applies to all College offices and/or departments that host minors in any on-campus program (College-Sponsored, Co-Sponsored or Non-College Sponsored) including ongoing, regularly scheduled programs of day-care, pre-school, counseling, diagnostic and therapeutic services, summer camps, educational experiential and development programs, research and study, and one-time special events and projects.

The Policy does not apply to on-campus residences; however it does apply to common areas (courtyards, lounges, common kitchens) of residential buildings. The Policy is not a substitute for compliance with city, state or federal law or regulation governing a specific program or activity involving minors on campus.

DEFINITIONS

Minor (minor child): A minor is any person under the age of 18, but, as such term is used in the Policy, excludes those enrolled at the College as registered, matriculated students. Minors are persons under the age of 18 participating in any program or activity on campus, both those that are College-Sponsored and/or those that are sponsored by outside organizations using College facilities.

Adult: An adult is a person 18 years of age or older.

Authorized Adult: An Authorized Adult is an adult, 21 years of age or older, who is authorized, pursuant to the Policy, to supervise, or otherwise have direct contact with minors participating in an on-campus program. As noted below in the Policy, all College students, employees, independent contractors, volunteers, and representatives of third party Non-College Sponsored programs, acting as Authorized Adults, must be in compliance with the provisions of the Policy. Although a parent or legal guardian may supervise their own minor children and their guests who are minors while visiting the campus or using campus facilities, a parent or legal guardian may not act as an Authorized Adult in a program (including one in which his or her child participates) unless they are in compliance with the background check and training requirements outlined below.

College Sponsored Program: Any activity, program, or event that is designed to include participants who are minors, and is sponsored by Teachers College. Programs shall include ongoing, regularly scheduled programs of day-care, pre-school, counseling, diagnostic and therapeutic services, summer camps, educational experiential and development programs, research and study, workshops, group visits, and one-time special events and projects, but shall exclude:

- Performances or events open to the larger College community (TC and affiliates) or open to the general public (such as lectures, musical performances, and art shows).
- Visits and tours for prospective students organized by the Admissions Office or by the Office of Residential Services.

Co-Sponsored Program: Any activity, program, or event, that is designed to include participants who are minors, is sponsored jointly by the College and a third-party, and is located on the Teachers

College campus. Program shall include any activity that is Co-Sponsored by the College and a third party, is on campus, but shall exclude:

- Performances or events open to the general public (such as lectures, musical performances, art shows), school graduations, and/or school tours approved by the Office of School and Community Partnerships (OSCP).

Non-College Sponsored Program: Any activity, program, or event that is designed to include participants who are minors, and is sponsored by a third-party, and is located on the Teachers College campus. Program shall include any activity that is not College sponsored, is on campus, but shall exclude:

- Performances or events open to the general public (such as lectures, musical performances, and art shows).

Direct Contact: Providing care, supervision, guidance or control of minors, and/or having routine interaction with minors.

One-On-One Contact: Personal, unsupervised interaction between any Authorized Adult and a participant without at least one other Authorized Adult, parent or legal guardian being present.

I. GENERAL INFORMATION

A. PRESENCE OF MINORS ON CAMPUS

The College reserves the right to condition, restrict, or deny access to College facilities by minors at its discretion. All minors, including those participating in programs, shall be subject to all College regulations while on campus, and may be asked to leave the campus if unable or unwilling to comply.

Minors under the age of 16 must be supervised by an adult at all times while on campus. Minors 16 years of age or older may enter campus and be on campus on their own without direct adult supervision.

Minors are permitted in the areas of the host program (classrooms, offices, and activity rooms), general use areas, and public spaces with an Authorized Adult if under 16 years of age or without an Authorized Adult if 16 years of age or older, but all minors are prohibited from the high risk areas of:

- Facilities mechanical rooms, boiler rooms, trade shops, food preparation areas, shops, studios, exercise rooms, computer rooms, and construction sites (unless associated with a program activity);
- Any area of the College containing power tools or machinery with exposed parts;
- Rooftops, driveways, parking lots, loading docks, playing in or on stairways (external or internal), or playing adjacent to unlocked swinging doorways (external or internal);
- Offices or classrooms not specifically assigned to the minor's program.

B. MINOR CHILDREN OF EMPLOYEES

The Policy is not intended to address minor children of employees who may be on campus in the company of the employee. Generally, children are not to be brought to work on a regular basis in lieu of childcare. Employees may obtain supervisory approval to bring children to the workplace on rare occasions for a justifiable reason such as a family emergency provided, however, that the employee's supervisor approves a request to do so in advance, that the children are constantly supervised by the parent, that the children are not left with other employees, and that the children do not interfere with workplace activities. Employees should consult their supervisor and/or the Office of Human Resources with questions related to bringing their own minor children to campus.

C. MINOR CHILDREN OF VISITORS

Line of sight supervision by the parent or guardian is required at all times for minors under the age of 16.

Minors are not allowed in high risks areas as defined above.

The parent or guardian must assure that minors are not disruptive to others.

The parent or guardian must not leave a minor under the age of 16 unattended at any College function or activity.

Minors under the age of 16 may not be left unattended in building lobbies, at Public Safety Desks, in the libraries, or in lounges or any other public space.

Minors and guests not meeting relevant College community conduct standards may be asked to leave campus.

D. MINOR CHILDREN OF STUDENTS

Minors under the age of 16 should not be left unattended while the parent or guardian is attending class or conducting other business or social function on campus.

Line of sight supervision by the parent or guardian is required at all times for minors under the age of 16.

The parent or guardian must assure that minors are not disruptive to others.

Minors are not allowed in high risks areas as defined above.

Minors under the age of 16 may not be left unattended in building lobbies, at Public Safety Desks, in the libraries, or in lounges or any other public space.

Minors are not allowed in classrooms with a student while classes are in session unless permission is granted by the faculty member teaching the class. If a minor becomes disruptive the faculty member may require the student and minor to leave.

E. MINORS AS OVERNIGHT GUESTS

Minors who are overnight guests of students or faculty in on-campus housing must comply with the supervision and access requirements described below, as well as with Office of Residential Services Rules and Code of Conduct.

Minors under the age of 16 must be supervised by an adult at all times while on campus.

II. COLLEGE SPONSORED PROGRAMS

A. REGISTRATION – COLLEGE SPONSORED PROGRAMS

EXISTING COLLEGE SPONSORED PROGRAMS

College Sponsored Programs already operating on campus must register with the Office of Public Safety prior to June 1, 2016. Existing programs must submit a registration form, form #201(OPS.M.2015.201) and a roster of Authorized Adults, form #202 (OPS.M.2015.202). Both forms are available online on the Office of Public Safety website (<http://www.tc.columbia.edu/security/>) as well as in hard copy, at the Office of Public Safety, Investigations Team, Suite 1A, Whittier Hall. Additional details about required self-disclosure and background check forms that must be submitted by proposed Authorized Adults are in Section II.K below, *Self- Disclosure and Background Checks* (p. 12).

Once these forms are submitted, Office of Public Safety staff shall meet with program staff to discuss current program operations, review the Policy, and to develop strategies for the program to comply with the Policy. The Office of Public Safety shall provide a completed copy of the registration packet to the Teachers College Risk Manager, and shall also notify the Office of the Registrar/Room Assignments of the program and of any requirements as to space needs as may be dictated by either the type of program and/or challenges related to minor attendees. The Office of Public Safety may also notify other College offices including the Office of Facilities, the Office of Environmental Health and Safety, and the Office of School and Community Partnerships as may be required in support of the existing program.

NEW COLLEGE SPONSORED PROGRAMS

New College Sponsored Programs must be approved by the Provost. New programs must submit a brief registration sheet, form #201(OPS.M.2015.201) and a roster of Authorized Adults, form #202 (OPS.M.2015.202). Both forms are available online on the Office of Public Safety website (<http://www.tc.columbia.edu/security/>) as well as in hard copy, at the Office of Public Safety, Investigations Team, Suite 1A, Whittier Hall. Additional details about required self-disclosure and background check forms that must be submitted by proposed Authorized Adults are in Section II.K below, entitled *Self- Disclosure and Background Checks* (p. 12).

Newly approved College Sponsored Programs should meet with the Office of Public Safety during the planning stages, no later than three months (six months preferred) prior to the proposed program start date, to allow sufficient time to facilitate the registration and planning of the new program within the framework of the Policy. The Office of Public Safety shall provide a completed copy of the registration to the Teachers College Risk Manager, and shall also notify the Office of the Registrar/Room Assignments of the program and of any requirements as to space needs as may be dictated by either the type of program and/or challenges related to minor attendees. The Office of Public Safety may also notify other College offices including the Office of Facilities, the Office of Environmental Health and Safety, and the Office of School and Community Partnerships as may be required in support of the new program.

B. FACILITIES USE

FACILITIES OTHER THAN THE GOTTESMAN LIBRARIES

College Sponsored Programs seeking to use College facilities other than the Gottesman Libraries for a program or activity hosting minors must request facilities use through the Office of the Registrar/Room Assignments as early as possible prior to the planned start date to ensure space availability.

GOTTESMAN LIBRARIES

Programs seeking to use Gottesman Libraries facilities for a program or activity hosting minors must request facilities use directly through the Gottesman Libraries as early as possible prior to the planned start date to ensure space availability.

C. ACCESS CONTROL

AUTHORIZED ADULTS

Full time and/or part time Authorized Adults who are students, faculty, or staff of the College must present and swipe their TC ID card upon entry to campus and upon entry to any secure areas assigned to their program.

All other adults (staff, interns, volunteers) designated as Authorized Adults for a program, and who are not students, faculty, or staff of Teachers College, must check in at the Zankel Public Safety Desk upon arrival to campus, present a government issued photo identification, and receive a TC Visitor Pass on each day they are on campus. Authorized Adults not affiliated with the College who are working in a program for an extended period of time may, upon request of the program director and approval by the Office of Public Safety, receive an "extended" TC Visitor Pass valid for an extended period of time up to a maximum of one academic semester, or receive a TC ID card with general access privileges.

MINOR ATTENDEES

Minors under the age of 16, who are attending a College Sponsored Program, must be met at the Zankel Building Public Safety Desk (the main entrance to campus at 525 West 120th Street) by an Authorized Adult of the Program, signed in, and escorted to and from the Zankel Building Public Safety Desk and the program location.

Minors over the age of 16, who are attending a College Sponsored Program, must sign in at the Zankel Building Public Safety Desk, and if applicable to his/her program present a program identification card issued by the program in a design, format and color that has been approved by the Office of Public Safety. Minors 16 years of age or older may enter campus and be on campus on their own without direct adult supervision.

Upon request of a program director, provisions may be made to expedite the sign-in procedures for large groups of minor attendees, adults, and Authorized Adults. Such a provision shall require an attendance roster from the sponsoring program.

PARENTS AND GUARDIANS OF MINOR ATTENDEES

Parents and guardians of minor attendees of a College Sponsored Program must sign in at the Zankel Public Safety Desk upon arrival to campus, present government issued photo identification (driver's license, state ID card, NYC ID card, passport), and receive a TC Visitor Pass, each day they are on campus. Parents and guardians who regularly visit the College to drop off and pick up minor attendees of a program may receive a program identification card issued by the program in a design, format and color that has been approved by the Office of Public Safety. A program identification card may be presented at a Public Safety Desk in lieu of a TC ID card or TC Visitor Pass to gain entry to the campus. The Office of Public Safety provides programs with requirements and formats for parent and guardian identification cards.

AVAILABLE ENTRANCES TO CAMPUS

Program attendees, volunteers, parents and guardians must use the Zankel Building entrance to campus. The Thorndike Hall driveway entrance may be available for select programs with special needs and pre-approval of the Office of Public Safety. The Whittier Hall entrance and the Grace Dodge Hall entrance may not be used for programs. The Broadway entrance to Horace Mann Hall and the Cowin Center may be available for special events and select programs.

D. COMMUNICATION PLAN

All programs shall develop a procedure for notification to parents or legal guardians of program attendees in the event of an emergency. All programs shall obtain and maintain in readily accessible format contact information for attendees parents or legal guardians, and in addition, for an emergency contact other than a parent or legal guardian in the event a parent or legal guardian is not available. All programs should provide contact information for the program and for the College Office of Public Safety to all parents or guardians of attendees.

All programs should provide emergency contact information, for both business hours and non-business hours contact, of the senior staff members of the program, to the Office of Public Safety, Investigations Team. The emergency contact information shall only be used if an emergency requires the Office of Public Safety to contact the program staff.

E. MEDICAL EMERGENCY PLAN

All programs shall develop a Medical Emergency Plan which should include in part:

- Authorization from all minor attendees' parents/legal guardians to permit transportation of program participants via Emergency Medical Services (CU CAVA or 911 EMS) to local hospitals if deemed necessary;
- Authorization for emergency medical treatment in the event the parents/legal guardians or their designated emergency contact are not available;
- Disclosure of any allergies or other medical condition or physical limitation that might impact participation in the program;
- Authorization for, and written procedures for, the administration of medication to minors participating in the program if requested to administer medication by a parent or legal guardian and if the program is such that the administration of medication is permissible under

the program’s policies and guidelines , and if applicable, the program compliance obligations. If administration of medication is applicable to the program, the procedures for the administration of medication shall be established with the guidance of health professionals (CU Health Services, St. Luke’s Hospital, etc.).

F. SUPERVISION PLAN

All programs shall develop a plan for adequate supervision of minors, taking into consideration the type and location of the program, the average age of attendees, and details of the program activity. The Supervision Plan should specifically identify the individual with supervisory responsibility over all Authorized Adults serving in the program, and the planned ratio of Authorized Adults to attendees. For programs other than New York City Department of Education field trips, the minimum Authorized Adult to minor attendee ratio for all College sponsored or Co-Sponsored Programs is charted on the following page. Additional personnel may be required based on the needs of the minor(s) or the activities planned.

SUPERVISION RATIOS - AUTHORIZED ADULTS TO MINORS (MINIMUM REQUIREMENTS)

Age of Minors	Authorized Adults (AA)	Target Ratio
Up to one 1 year	2 AA minimum for up to 4 Minors, + 1 additional AA for each additional 1 to 3 Minors	2 AA minimum + 1 to 3 ratio
1 year – 3 years	2 AA minimum for up to 4 Minors, + 1 additional AA for each additional 1 to 4 Minors	2 AA minimum + 1 to 4 ratio
4 years – 5 years	2 AA minimum for up to 6 Minors, + 1 additional AA for each additional 1 to 6 Minors	2 AA minimum + 1 to 6 ratio
6 years – 8 years	2 AA minimum for up to 16 Minors, + 1 additional AA for each additional 1 to 16 Minors	2 AA minimum + 1 to 16 ratio
9 years – 14 years	2 AA minimum for up to 20 Minors, + 1 additional AA for each additional 1 to 20 Minors	2 AA minimum + 1 to 20 ratio
15 years – 17 years	2 AA minimum for up to 24 Minors, + 1 additional AA for each additional 1 to 24 Minors	2 AA minimum + 1 to 24 ratio

Examples:

- A program hosting seven minors age three would be required to have three Authorized Adults present.
- A program hosting twenty three minors age ten would be required to have three Authorized Adults present.

Programs hosting large groups of minors for special events and activities, may, with coordination from, and concurrence of the Office of Public Safety, meet the TC minimum requirements for supervision ratios through the use of a combination of Authorized Adults and adults.

For Co-Sponsored New York City Department of Education field trips to/from the College, the Department of Education requirements for the ratio of Authorized Adults to minors shall apply. The New York City Department of Education requirements may be found in Section VI.D of this Policy, entitled *New York City Department of Education Field Trip Supervision Requirements* (p. 21).

Limited exceptions to the Policy for College Sponsored or Co-Sponsored Programs, as related to staff ratios and Authorized Adults, may be made on case by case basis jointly by the Office of School and Community Partnerships and the Office of Public Safety.

G. TRANSPORTATION/PICK-UP AND DROP-OFF PLAN

All programs shall develop a procedure for the pick-up and drop-off of attendees. The plan should be specific as to times and as to locations. The Office of Public Safety can work with the program administrator to identify the best pick-up and drop-off locations for the program.

The Transportation Plan shall ensure that no minor may be released to any person other than his or her parent or guardian without specific written authorization from the parent or guardian. The plan shall provide a procedure for the positive identification of parents or guardians or other authorized persons prior to releasing a minor. The plan shall specify that under no circumstances shall an Authorized Adult be permitted to be alone with a minor in a vehicle, unless that Authorized Adult is the parent or guardian of that minor, or is authorized to do so by the parent or guardian.

For drop-off and pick-up locations see Section II. C, entitled *Access Control* above (p. 7).

TRANSPORTATION OF MINORS USING PRIVATE BUS CARRIERS

College Sponsored Programs contracting with private bus carriers for transporting minors to and from campus and off campus activities may contract only with private bus carriers that maintain a current “preferred” performance category rating from the New York State Department of Transportation. Contracts with private bus carriers must be reviewed and approved by the Office of the General Counsel and the Office of Public Safety prior to using the services of the carrier. Proposed contracts for private bus carriers must include the carrier’s federal DOT number, and the carrier’s state Motor Carrier number.

H. AUTHORIZATIONS, WAIVERS, AND RELEASES

All College Sponsored Programs hosting minors on campus shall require waiver/release forms signed by parents or legal guardians for the participation of minors in the program.

If minors will be photographed, recorded or videotaped during the program and those images or recordings may be used for study, advertising, recruitment, promotion or similar uses, a waiver/release form signed by a parent or legal guardian authorizing such uses is required.

A medical release form may be required for some programs.

All College Sponsored Programs hosting minors on campus shall require waiver/release forms signed by parents or legal guardians for emergency medical treatment.

Standard waiver/release formats, pre-approved by the TC General Counsel, may be found on the Office of the General Counsel website at <http://www.tc.columbia.edu/counsel/>.

All program authorizations and waivers, using a standard format, or a special format tailored to a particular program must be authored by and/or pre-approved by the TC General Counsel.

I. INSURANCE REQUIREMENTS

All proposed Non-College Sponsored and/or Co-Sponsored Programs must meet minimum College insurance requirements. Those requirements are detailed in form #206 (OPS.M.2015.206) which is available online on the Office of Public Safety website (<http://www.tc.columbia.edu/security/>) as well as in hard copy, at the Office of Public Safety, Investigations Team, Suite 1A, Whittier Hall. Questions about College insurance requirements may be directed to the TC Office of Risk Management (located in 107 Zankel Building) via email to Kaplan@tc.edu, by phone at 212.678.3482, or via snail mail to Teachers College Office of Risk Management, Box 83, 525 West 120th Street, New York, NY 10027.

J. TRAINING REQUIREMENTS FOR AUTHORIZED ADULTS

Each person (student, staff, faculty, volunteer, independent contractor, parent or legal guardian) proposed to serve as an Authorized Adult shall complete the Teachers College Supervision of Minors – Authorized Adult orientation, or certify via form #203 (OPS.M.2015.203) that they have completed the self-directed *Training Manual for Authorized Adults* provided as an addendum to this Policy, prior to serving as an Authorized Adult. The orientation and training requirement may be met through classroom and/or online training modules provided by the Office of Public Safety, or may be met through self-directed training by reviewing materials provided by the Office of Public Safety and then certifying such self-directed training via form #205 (OPS.M.2015.205). The orientation and training consists of:

- Teachers College *Policy and Guidelines for the Supervision of Minors*
- Teachers College facilities
 - ▶ Fire alarm procedures in case of fire or smoke detected on campus
 - ▶ Campus evacuation plan
 - ▶ Medical emergencies
 - ▶ Access control, entrances, and exits
 - ▶ High risk areas
 - ▶ General use areas
 - ▶ Campus Emergency Management Plan
 - ▶ Restroom use protocols and locations
 - ▶ Outdoor activities
 - ▶ Administration of medication
 - ▶ Traveling through campus grounds, street crossings, courtyards
 - ▶ Special needs
 - ▶ Special concerns
- Teachers College *Policy on Abuse and Harassment of Minors and Adults*
- New York State Mandated Reporter Training

It is recommended that each Authorized Adult be trained and certified in Basic First Aid and CPR and that in every program there always be at least one Basic First Aid/CPR trained Authorized Adult at the program location at any time during the program.

K. SELF-DISCLOSURE AND BACKGROUND CHECKS

Each person (student, staff, faculty, volunteer, independent contractor, parent or legal guardian) proposed to serve as an Authorized Adult shall be required to provide a background release, form #204 (OPS.M.2015.204), and a self-disclosure, form #205 (OPS.M.2015.205), listing any and all criminal convictions as an adult and shall agree to immediately disclose any conviction thereafter. Each person (student, staff, faculty, volunteer, independent contractor, parent or legal guardian) proposed to serve as an Authorized Adult shall be required to successfully complete a personal background check prior to participating in any program or activity involving minors. Background checks pertaining to College Sponsored Programs shall be conducted by the TC Office of Public Safety or a contractor at the direction of the Office of Public Safety. Background checks shall include at minimum:

- Verification of identification
- State and national criminal history search
- State and national sex offender registries
- State child abuse search

All such background checks shall be conducted in compliance with applicable state and federal laws and regulations, and in compliance with the applicable provisions of the Fair Credit Reporting Act.

Background checks may require fingerprinting of the proposed Authorized Adult.

No person (student, staff, faculty, volunteer, independent contractor, parent or legal guardian) proposed to serve as an Authorized Adult shall do so until the Office of Public Safety determines that the person has successfully completed the College background check requirements.

IMPORTANT NOTE - Teachers College background checks are separate and distinct from any personnel background checks that may be required of a particular program that is regulated by and has compliance obligations of the New York City Department of Education (DOE) or the New York City Department of Health (DOH). Programs with DOE or DOH compliance obligations for personnel background investigations must provide the results of those completed investigations to the Office of Public Safety.

The Office of Public Safety shall evaluate the results of those personnel background investigations (DOE and/or DOH) and supplement them if/when needed. In any event, no person (student, staff, faculty, volunteer, independent contractor, parent or legal guardian) proposed to serve as an Authorized Adult shall do so until the Office of Public Safety determines that the person has successfully completed the College background check requirements.

A criminal conviction in and of itself is not disqualifying. A criminal conviction, as an adult, for a criminal offense involving a minor or a crime of violence may be disqualifying.

L. CODE OF CONDUCT FOR INTERACTING WITH MINORS

Adults should be positive role models for minors, and act in a caring, respectful and responsible manner. Authorized Adults working in programs hosting minors are expected to comply with the below Code of Conduct.

- Minors, under the age of 16, must be visually supervised at all times by an Authorized Adult while on campus, or by their own parent or guardian.
- Minors, under the age of 16, entering and exiting campus, or moving from one on-campus location to another, must be escorted by an Authorized Adult at all times.
- Generally, except in clinical settings (Dean Hope Center, Mysak Clinic) and Institutional Review Board (IRB) approved clinical trials, Authorized Adults should never be alone with a minor, and should never have one-on-one contact with a minor outside the presence of others. It is expected that non-clinical activities where minors are present will involve two or more Authorized Adults.
- Striking, hitting, administering corporal punishment to, horseplay, punching, poking, spanking, restraining or touching in an inappropriate way is prohibited, and in some instances illegal. Touching should generally only be in the open and in response to the minor's needs, for a purpose that is consistent with the program's mission and culture, and/or for a clear educational, developmental, or health related (e.g. treatment of an injury) purpose. Any resistance from the minor should be respected. Authorized Adults should not engage in any abusive conduct of any kind toward, or in the presence of a minor, including verbal abuse. If restraint is necessary to protect a minor from other minors or from other harm, all incidents must be documented and disclosed to the program director, the Office of Public Safety, and the minor's parent/guardian.
- Hazing or bullying of any kind is prohibited.
- Using or being in possession of unlawful drugs and abuse of otherwise lawful drugs is prohibited.
- Authorized Adults should not be under the influence of alcoholic beverages when supervising minors and should not, of course, permit minors to consume alcoholic beverages.
- The presence or use of sexually explicit materials, or making pornography of any form available to a minor, or assisting a minor in any way of gaining access or allowing access to pornography is prohibited and in some instances illegal. Authorized Adults are prohibited from engaging in any sexual activity; make sexual comments, or telling sexual jokes. Authorized Adults should not engage or allow minors to engage the Authorized Adult in romantic or sexual conversations, or related matters, unless required in the role of a counselor or health care provider.
- Taking any photographs or videos of minors or posting photographs or video of minors on a digital, electronic, hosted media, web-based service or any other medium without authorization.
- Use of an Authorized Adult's personal vehicle to transport a minor participating in a program, without consent of the parent or legal guardian, is prohibited.
- Engaging in communication with minors through email, text messages, social networking websites, internet chat rooms, or other forms of social media at any time except and unless there is an educational or programmatic purpose and the content of the communication is consistent with the mission of the program is prohibited.
- Engaging in intimate displays of affection of a sexual nature towards others in the presence of minors is prohibited.
- Participating in a sleepover under the auspices of a program, unless in the presence of a minor's parent or legal guardian or with written consent of a minor's parent or legal guardian is prohibited.

- Being alone with a minor in an Authorized Adult's living quarters is prohibited.
- Sharing a bed or sleeping bag with a minor is prohibited.
- Showering, bathing, or undressing with or in the presence of a minor is prohibited.
- Authorized Adults should not meet with minors outside of established times for program activities. Any exceptions require written parental authorization and must include more than one Adult from the program. Authorized Adults should not invite individual minors to the Authorized Adult's home. Any exceptions require authorization by the program director and written authorization by a parent/guardian.
- Authorized Adults are required to immediately report any abuse, harassment, or exploitation of a minor by other minors participating in the program or by any Authorized Adult.

M. ON-CAMPUS INTERNSHIPS

On-campus internships for minors hosted by a non-academic program/department must be pre-approved by the director of the program/department hosting the intern, the Office of School and Community Partnerships, and the Office of Public Safety. On-campus internships for minors hosted by an academic program/department must be pre-approved by the department chair, the Office of the Provost, and the Office of Public Safety. The Office of the Vice President for Finance and Administration must also approve any non-academic internships taking place within the Finance and Administration Division.

On-campus internships must comply with the following guidelines:

- The intern must be a full-time high school student 16 years of age or older.
- The hosting TC Program/department must receive a written request from a sponsoring high school, on official letterhead, signed by the school principal and outlining the specifics of the experience targeted and the TC Program where-in the internship is requested.
- The sponsoring high school must provide the College with an appropriate Hold Harmless/Indemnification letter, of a content and format approved by the TC General Counsel, or an appropriate Certificate of Liability Insurance naming TC as a co-insured, of content and format approved by the TC Risk Manager.
- A parental waiver/release form for participation in the internship (prepared or pre-approved by the TC General Counsel) must be signed by the intern's parent or legal guardian prior to the start of the internship.
- The hosting TC program/department must comply with all of the College Sponsored Program guidelines of the Policy.

N. SPECIAL CONSIDERATIONS

The Assistant Vice President for the Offices of Public Safety and Environmental Health and Safety, and the Associate Vice President for School and Community Partnerships may recommend to the Vice President for Finance and Administration to waive certain requirements within this Policy, on a case by case basis, that do not significantly compromise the intent of the Policy.

III. CO-SPONSORED PROGRAMS

A. REQUESTS TO USE COLLEGE FACILITIES

Co-Sponsored Programs seeking to use College facilities (general facilities and/or the Gottesman Libraries) for a program or activity hosting minors must request facilities use through the Office of School and Community Partnerships no later than six months (nine months preferred) prior to the planned start date, to allow sufficient time to facilitate the registration and planning of the new program within the framework of this Policy.

OSCP shall review, approve or deny the request, forward the results of its review to the Office of the Registrar and/or Gottesman Libraries. If a program is approved to use College facilities, the Office of the Registrar and/or Gottesman Libraries shall provide the proposed sponsor with form #206 (OPS.M.2015.206), *Application – Non College Sponsored and Co-Sponsored Programs Hosting Minors on Campus*. The application shall require detailed information about the program or event, information about the non-TC co-sponsor, and a certification that the non-TC co-sponsor will comply with this Policy. The completed application and certification must be returned by the TC co-sponsor to the Teachers College Office of Public Safety for review. The Teachers College Office of Public Safety may request additional information from the either co-sponsors. Applications meeting the Teachers College *Policy and Guidelines for the Supervision of Minors on Campus* shall be re-routed from the Office of Public Safety to the Office of the Registrar and/or Gottesman Libraries. Upon receiving approval to proceed from the Office of Public Safety, the Office of the Registrar and/or Gottesman Libraries shall evaluate the application for use of College facilities. An approval to proceed by the Office of School and Community Partnerships and subsequently by the Office of Public Safety pertains only to the ability to host minors on campus, and is not an approval for use of College facilities. The Office of the Registrar and/or the Gottesman Libraries shall evaluate each request in totality of all College facilities use requirements and space availability, and then determine if College facilities may be made available.

IMPORTANT NOTE – Co-Sponsored Programs that are jointly sponsored by an office/department of Teachers College and an off-campus individual or organization shall be approved as a Co-Sponsored Program only if a representative of the co-sponsoring College office/department is fully involved in the program and shall have a responsible representative, on-campus, actively participating during the program event or activities.

B. BACKGROUND CHECKS

Co-Sponsored Program/events involving minors must certify that each person (student, staff, faculty, volunteer, independent contractor, parent or legal guardian) proposed to serve as an Authorized Adult supervising minors within the scope of the proposed program or event at Teachers College has successfully completed a personal background check prior to participating in such program or event at Teachers College. Personnel background checks must include, at minimum:

- Verification of identification
- State and national criminal history search
- State and national sex offender registries
- State child abuse search

A successful completion of a personnel background check shall be defined as:

- Verified identity through a social security trace, date of birth, motor vehicle records, or any other authoritative and documented means to positively verify identity
- No criminal convictions, as an adult, involving child endangerment, contributing to the delinquency of a minor, child abuse, a sex offense, or any violent felony
- No registration in state or national sex offender registries
- No record of child abuse, maltreatment, or neglect

Those Co-Sponsored Programs that need to complete background checks on proposed Authorized Adults may seek a referral from the TC Office of Public Safety to one or more professional firms that can complete a background check within 24 to 72 hours at a cost ranging from approximately \$50.00 to \$75.00.

C. COMPLIANCE WITH THIS POLICY AND GUIDELINES

Co-Sponsored Programs/events involving minors must comply with Sections I.A, I.C, II.C, II.D, II.E, II.F, II.G, II.H, II.I, II.L, III.A, and III.B above, and IV, below, of the Policy. Those sections of the Policy, applicable to Co-Sponsored Programs are further illustrated in the application form for Non-College Sponsored and/or Co-Sponsored Programs, form #205 (OPS.M.2015.205).

Limited exceptions to the Policy for College Sponsored or Co-Sponsored Programs, as to staffing ratios and Authorized Adults, may be made on case by case basis jointly by the Office of School and Community Partnerships and the Office of Public Safety.

The Assistant Vice President for the Office of Public Safety, and the Associate Vice President for School and Community Partnerships may recommend to waive certain requirements within the Policy, on a case by case basis, that do not significantly compromise the intent of the Policy.

IV. NON-SPONSORED PROGRAMS

A. REQUESTS TO USE COLLEGE FACILITIES

Non-Sponsored Programs seeking to use College facilities for a program or activity hosting minors must request facilities use (general facilities and/or the Gottesman Libraries) through application to the Office of School and Community Partnerships no later than six months (nine months preferred) prior to the planned start date, to allow sufficient time to facilitate the registration and planning of the new program within the framework of this Policy.

OSCP shall review, and approve or disapprove the request, and forward the results of its review to the Office of the Registrar and/or Gottesman Libraries. If a program is approved to use College facilities, the Office of the Registrar and/or Gottesman Libraries shall provide the proposed sponsor with form #206 (OPS.M.2015.206), *Application – Non College Sponsored and Co-Sponsored Programs Hosting Minors on Campus*. The application shall require detailed information about the program or event, information about the sponsor, and a certification that the sponsor will comply with the *Teachers College Policy and Guidelines for the Supervision of Minors on Campus*. The completed application and certification must be returned by the sponsor to the Teachers College Office of Public Safety for review. The Teachers College Office of Public Safety may request additional information from the sponsor. Applications meeting requirements listed in this Policy shall be re-routed from the Office of Public Safety to the Office of the Registrar and/or Gottesman Libraries. Upon receiving approval to proceed from the Office of Public Safety, the Office of the Registrar and/or Gottesman Libraries shall evaluate the application for use of College facilities. An approval to proceed by the Office of School and Community Partnerships and subsequently by the Office of Public Safety pertains only to the ability to host minors on campus, and is not an approval for use of College facilities. The Office of the Registrar and/or the Gottesman Libraries shall evaluate each request in totality of all College facilities use requirements and space availability, and then determine if College facilities may be made available.

B. BACKGROUND CHECKS

Non-College Sponsored Programs/events involving minors must certify that each person (student, staff, faculty, volunteer, independent contractor, parent or legal guardian) proposed to serve as an Authorized Adult supervising minors within the scope of the proposed program or event at Teachers College has successfully completed a background check prior to participating in such program or event at Teachers College. Personnel background checks must include, at minimum:

- Verification of identification
- State and national criminal history search
- State and national sex offender registries
- State child abuse search

A successful completion of a personnel background check shall be defined as:

- Verified identity through a social security trace, date of birth, motor vehicle records, or any other authoritative and documented means to positively verify identity
- No criminal convictions, as an adult, involving child endangerment, contributing to the delinquency of a minor, child abuse, a sex offense, or any violent felony
- No registration in state or national sex offender registries

- No record of child abuse, maltreatment, or neglect

Those Non-College Sponsored Programs that need to complete background checks on proposed Authorized Adults may seek a referral from the TC Office of Public Safety to one or more professional firms that can complete a background check within 24 to 72 hours at a cost ranging from approximately \$50.00 to \$75.00.

C. COMPLIANCE WITH THIS POLICY AND GUIDELINES

Non-College Sponsored Programs/events involving minors must comply with Sections I.A, I.C, II.C, II.D, II.E, II.F, II.G, II.H, II.I, II.L, III.A, and III.B above, as well as section IV (A, B, and C) of the Policy. Those sections of the Policy, which are applicable to Non-Sponsored Programs are further illustrated in the application form for Non-College Sponsored and/or Co-Sponsored Programs, form #205 (OPS.M.2015.205).

Limited exceptions to the Policy for Non-College Sponsored Programs, as to staffing ratios and Authorized Adults, may be made on case by case basis jointly by the Office of School and Community Partnerships and the Office of Public Safety.

The Assistant Vice President for the Office of Public Safety, and the Associate Vice President for School and Community Partnerships may recommend to waive certain requirements within the Policy, on a case by case basis, that do not significantly compromise the intent of the Policy.

V. REPORTING INAPPROPRIATE BEHAVIOR, ABUSE AND MALTREATMENT OF MINORS

Every member of the Teachers College community has an obligation to report immediately to the Teachers College Office of Public Safety any instances or suspected instances of the abuse of or inappropriate interactions with minors.

It is the policy of the College that no individual making a good faith report of suspected abuse or neglect will be retaliated against in the terms and conditions of employment or educational program.

If a minor is in **immediate danger** you should **immediately** phone the New York City Police Department via 911, or the TC Office of Public Safety from any on-campus phone at extension 3333, or from an off-campus phone at 212.678.3333.

Authorized Adults must review and comply with the Teachers College *Policy on Abuse and Harassment of Minors and Adults* which can be found in the College's web-based Policy Library at: www.tc.edu/policylibrary/abuse.

A. REPORTING SUSPECTED ABUSE AND MALTREATMENT OF MINORS – NEWYORK STATE MANDATORY REPORTING

New York State recognizes that certain professionals are specially equipped to perform the important role of mandated reporter of child abuse or maltreatment. Those professionals include school officials, child care workers, day care workers, camp directors, and others. Any individual serving as an Authorized Adult in a program hosting minors on campus may be considered a "Mandated Reporter" under New York State Law.

B. WHEN ARE YOU MANDATED TO REPORT

Mandated reporters are required to report suspected child abuse or maltreatment when they are presented with a reasonable cause to suspect child abuse or maltreatment in a situation where a child, parent, or other person legally responsible for the child is before the mandated reporter when the mandated reporter is acting in his or her official or professional capacity. "Other person legally responsible" refers to a guardian, caretaker, or other person 18 years of age or older who is responsible for the care of the child. Mandated reporters who are social services workers have expanded reporting requirements. Social services workers are required to report when, in their official or professional role, they are presented with a reasonable cause to suspect child abuse or maltreatment where any person is before the mandated reporter and the mandated reporter is acting in his or her official or professional capacity.

For additional information about Reporting Suspected Abuse and Maltreatment of Minors, and/or New York State Mandatory Reporting, please refer to the New York State Office of Children and Family Services website at <http://ocfs.ny.gov/main/> or to the New York City Administration of Children's Services website at <http://www.nyc.gov/html/acs/html/home/home.shtml>.

VI. RESOURCES

A. RESOURCES FOR THE PROTECTION OF MINORS

Recognizing and Reporting Child Abuse and Neglect

This brochure from the NYC Administration for Children's Services addresses questions often asked by friends, neighbors, and relatives about recognizing and reporting child abuse and neglect.

http://www.nyc.gov/html/acs/downloads/pdf/child_abuse_eng.pdf

Parent's Guide to New York State Child Neglect and Abuse Laws

As part of its ongoing effort to ensure the safety and well-being of New York City's children, Children's Services has produced this Fourth edition of the Parent's Guide to the New York State Child Neglect and Abuse Laws. Children's Services acknowledges the many challenges that families and children encounter. This publication provides useful information about the New York State laws that protect children. http://www.nyc.gov/html/acs/downloads/pdf/stateguide_english.pdf

Preventing Child Sexual Abuse Within Youth-Serving Organizations

This 48-page guide from the Centers for Disease Control and Prevention, U.S. Department of Health and Human Services includes chapters on prevention, overcoming challenges, developing processes, and implementing training. <http://www.cdc.gov/violenceprevention/pdf/preventingchildsexualabuse-a.pdf>

B. RESOURCES FOR MANDATED REPORTERS

Summary Guide for Mandated Reporters in New York State

This material provides mandated reporters with an overview of their obligations and some basic information about the New York State Child Protective Services (CPS) system.

<http://ocfs.ny.gov/main/publications/Pub1159.pdf>

Mandated Reporter Self-Directed Online Training

This online, two hour, web-based online training course is sponsored by the New York State Office of Children and Family Services. This course meets the New York State Education Department mandatory requirements for Training in Child Abuse Identification and Reporting.

<https://www.nysmandatedreporter.org/TrainingCourses.aspx>

C. RESOURCES FOR PROGRAMS HOSTING MINORS ON CAMPUS

New York City Department of Health and Mental Hygiene Compliance Requirements

- Summer Camps - <http://www.nyc.gov/html/doh/html/living/camp-directors-info.shtml>
- Child Care - <http://www.nyc.gov/html/doh/html/living/childcare.shtml>

NYC Department of Education:

- <http://schools.nyc.gov/default.htm>
- Compliance Services: <http://schools.nyc.gov/Offices/GeneralCounsel/OCS/default.htm>

NYC GoPass: <https://staging.fcny.org/gp/volunteers/how/step3/>

Teachers College Office of Teacher Education:

<http://www.tc.columbia.edu/office-of-teacher-education/>

Teachers College Office of School and Community Partnerships:
<http://www.tc.columbia.edu/oscp/>

Teachers College Office of Public Safety:
<http://www.tc.columbia.edu/security/>

E-mail to officeofpublicsafety@tc.columbia.edu

Attention: Robert Wilson, Senior Associate Director, Investigations

D. NEW YORK CITY DEPARTMENT OF EDUCATION FIELD TRIP SUPERVISION REQUIREMENTS

Type of Trip	Elementary School	Middle School	High School
DOE Routine Day Trips Within NYC	1 Staff member + 2 additional adults for up to 30 students. For each 10 students, an additional adult is required.	1 staff member + 2 additional adults for up to 30 students. For each additional 15 students, an additional adult is required.	1 staff member + 1 additional adult for up to 30 students. For each additional 15 students, an additional adult is required.

E. PRIMARY GUIDANCE TO WHICH THIS POLICY AND GUIDELINES RESPOND

Title 6 of Article 6 of the New York State Social Services Law, §§411-428 defines child abuse and maltreatment.

Article 10 of the New York State Family Court Act, §1012 further defines child abuse, maltreatment and other key terms commonly used in investigations and reports.

Title IX of the Education Amendments of 1972 (“Title IX”) is a Federal Civil Rights law that prohibits discrimination on the basis of sex and gender in any education program or activity receiving federal funds.

The Jeanne Clery Disclosure of Campus Security Policy and Campus Crime Statistics Act, 20 U.S.C. §1092(f) (the “Clery Act”) requires all colleges and universities that participate in federal financial aid programs to keep and disclose information about crime on and near their campuses with penalties for infractions. The Teachers College annual Campus Safety Report can be found at <http://www.tc.columbia.edu/security/index.asp?Id=Crime+Statistics+%2F+Clery+Report&Info=Annual+Report>.

New York State Child Protective Services Act of 1973

New York State Child Abuse Prevention Act of 1985

APPENDIX A: MINORS ON CAMPUS - FAQs

Who is required to have a background check?

All Authorized Adults who have direct contact with minors on campus are required to successfully complete a criminal background check. As previously defined (p. 2) an Authorized Adult is an adult, 21 years of age or older, who is authorized, pursuant to the Policy, to supervise, or otherwise have direct contact with minors participating in an on-campus program.

How do I arrange for a background check for my staff?

The TC Office of Public Safety shall facilitate the processing of criminal background checks for proposed Authorized Adults serving in College sponsored programs and activities hosting minors on campus. Questions about background checks may be directed to the Office of Public Safety, Associate Director, Investigations, by phoning 212.678.7468, 212 678.3220, or by email to officeofpublicsafety@tc.columbia.edu

Am I required to register programs and activities involving minors?

Yes, programs or activities in which minors participate will need to complete a registration form and comply with the new Policy.

I manage a long standing program presently operating at Teachers College. What do I need to do to meet the new *Policy and Guidelines on Supervision of Minor Children on Campus*?

Existing College sponsored programs should complete the registration form, Authorized Adult roster, and background waiver forms, and return same to the Office of Public Safety.

Existing programs should review the Policy in detail and make any adjustments in program operations that are necessary to comply with the Policy.

Existing programs should schedule staff to complete the staff training components required in the Policy.

Proposed Authorized Adults for existing College sponsored programs will need to meet background check requirements and be authorized (as to successful completion of a background check), by the Office of Public Safety, prior to participating in the program as a member of the program staff. Existing Authorized Adults, who were employed with the program prior to the adoption of the Policy, and who have successfully completed a background check through the NYS Department of Education and/or the NYS Department of Health do not need to be approved by the Office of Public Safety, but will be required to have a completed College background waiver form on file in the Office of Public Safety.

It is strongly recommended that directors and supervising staff of existing College sponsored programs meet with the Office of Public Safety to review their existing program, the new Policy, to share resources, and to address any potential conflicts or concerns.

I would like to rent space on campus to host a summer camp. Who should I contact at the College to make that request?

Requests to use College facilities should be made to the TC Office of the Registrar, located in: 324 Thorndike Hall ♦ Phone: 212-678-4050 ♦ Fax: 212-678-3005 ♦ Email: registrar@tc.columbia.edu

I am applying to be a student teacher. How do I get my background check and fingerprints completed?

Student Teacher applicants should coordinate student teaching requirements with the Teachers College Office of Teacher Education, located in Zankel Building 411 ♦ Phone: 212.678.4057 ♦ Fax: 212.678.3153 ♦ Email: ote@tc.edu ♦ Website: <http://www.tc.columbia.edu/office-of-teacher-education/>

I am bringing a high school class to campus for a day- long event. Do I have to comply with the new Policy?

Yes, please review the Policy and contact the Office of Public Safety to review the details of your event. Upon review, particular modifications to the Policy may be available for your event.

This new Policy states that minors need to be met at a Public Safety Desk and escorted to and from an on-campus activity. Do I really need to meet minors that are coming to my office or can they just come on up by themselves?

Minor attendees to a College sponsored program, who are under the age of 16, must be met by an Authorized Adult of the program, and must be signed in and escorted to and from the Zankel Public Safety Desk and the program location.

Minor attendees to a College sponsored program, who are 16 or 17 years of age, must sign in at the Zankel Public Safety Desk. Minors 16 and 17 years of age may enter campus and move throughout the campus by themselves without an escort.

Upon request of a program director, provisions may be made to expedite the sign-in procedures for large groups of minor attendees, adults, and Authorized Adults. Such a provision shall require an attendance roster from the sponsoring program.