



Policy for On-Campus Programs Involving Minors

Adopted May 16, 2020

A. Application and Definitions

The Gentleman's Rule and the Employment Guide govern the conduct of Wabash students and staff, respectively, in all contexts. This policy has been added to provide special safeguards in Programs that Wabash or a third party under contract with the College conducts on campus involving one or more minors. As used in this policy, "Programs" means ongoing or planned events such as summer camps, lessons, club meetings, practices, tutoring activities, service learning, research activities, and athletic competitions.

Accordingly, this policy applies to activities and Programs that:

1. Are conducted (a) by Wabash College, or by a third party under a contract that such third party has entered into with the College for the specific purpose of conducting the Program (b) on property that is owned, operated, or managed by the College ("On-Campus Programs"); and
2. Involve one or more persons who are (a) under 18 years of age, and (b) not enrolled as Wabash College students ("Minors").

Any contract permitting a third party to conduct an On-Campus Program involving one or more Minors must require compliance with this policy.

This policy (other than Section B, which applies at all times and in all circumstances) does not apply to (i) activities or programs related to visits to the College by one or more Minors who are (a) candidates for admission to the College or (b) on a visit with a class from their school; (ii) visits by siblings or other minor guests of enrolled students other than for the purpose of participating in an On-Campus Program involving one or more Minors; (iii) performances or events open to the general public that are not targeted toward Minors (such as athletic competitions, plays, or concerts); (iv) regularly scheduled classes or activities designed primarily for enrolled students; or (v) other activities or programs exempted from this policy by the Chief Financial Officer.

B. Reporting and Other Action to Protect Against Child Abuse or Neglect

Indiana state law requires that any person who has reason to believe that a child under 18 years of age is a victim of child abuse or neglect must immediately make an oral report to the Department of Child Services (DCS) 1-800-800-5556 and/or to the Crawfordsville Police Department by calling (765) 362-3762 or 911.

Immediately after making such report, also notify both Wabash's Safety and Security Office at (765) 361-6188 and Wabash's Title IX coordinator at (765) 361-6347.



When appropriate, those conducting an On-Campus Program involving one or more Minors should also take immediate steps to separate an individual accused or suspected of abuse or neglect from Program activities and interaction with Minors pending resolution of the accusation or suspicion.

C. Other Emergencies

In case of any emergency other than one involving suspected child abuse or neglect, immediately call Wabash's Safety and Security Office at (765) 361-6188 (office) or (765) 307-1927 (cell) or Crawfordsville Police at (765) 362-3762 or 911.

D. Criminal Background Checks; Permissible Exceptions

To be eligible to serve in connection with an On-Campus Program involving one or more Minors, any person who is (a) a College employee, (b) an enrolled student of the College, or (c) a Program Participant or other individual who will (i) serve as a director or supervisor of the Program, (ii) stay overnight with Minors in connection with the Program, or (iii) regularly spend time with one or more Minors during the Program, must have undergone a criminal background check, including a sex-offender registry check, within the last five years.

Any individual required to have undergone a background check under this policy must immediately report to the College's Director of Human Resources, in writing, in the event that he or she is convicted of any crime, is charged with any felony, or becomes the subject of a report of child abuse or neglect.

Notwithstanding the foregoing, those in charge of occasional On-Campus Programs (a) for which a large number of Program Participants is essential (e.g., Basketball Shootout, Swimming Meet) and (b) that do not involve one or more Minors staying overnight, may request, in writing, permission from the Director of Human Resources to adopt measures and safeguards other than criminal background checks for certain Program Participants ("Non-checked Program Participants"). Such measures and safeguards should ensure that:

- Those managing the Program will, in advance of the Program (i) compile the names of, and contact information for, all Non-checked Program Participants and (ii) check each name against the sex-offender registry before accepting such persons as Program Participants;
- All Non-checked Program Participants must present photo identification before commencing to serve at the Program;
- All Non-checked Program Participants will at all times serve in public places and not be alone with any Minor; and
- One or more background-checked persons will supervise all Non-checked Program Participants.

Any Program for which an exception for Non-checked Program Participants is sought shall proceed only after, and in accordance with, the written permission of the Director of Human Resources.

When Wabash students are participating in an external program or organization that involves children as a service learning activity or as part of a Wabash club (e.g., College Mentors for Kids), the Dean of

Students' Office shall ascertain whether the external activity has its own policy on background checks, training, and reporting which is as rigorous as this policy. If so, at the beginning of each school year the Wabash student leaders of the external program or organization shall certify to the Dean of Students' Office that it follows its external organization's policy and shall answer any questions the Dean of Students' Office poses regarding the same. If the external organization's policy is not as rigorous as this policy, the Wabash students participating in the organization shall follow this policy.

E. Training

College students, faculty, and staff who participate in College-affiliated On-Campus Programs involving one or more Minors must complete appropriate training. Such training should cover, among other information:

- Advice regarding the treatment and protection of Minors, including warning signs of abuse and neglect;
- The reporting requirements listed in Sections B and C above;
- Advisable staff-to-Minor Ratios; and
- Title IX Training administered by the College's Title IX Office.

F. Medical Consent and Roster

The director or supervisor of an On-Campus Program Involving one or more Minors shall ensure that any Minor who participates and is not accompanied by a parent or legal guardian shall, at or before commencement of the On-Campus Program, provide a form by which the Minor's parent(s) or legal guardian (a) consents to the Minor's receiving necessary medical and hospital treatment, (b) identifies the Minor's health insurance carrier, and (c) provides emergency contact information for the Minor's parent(s) or legal guardian.

The form shall be signed by the Minor's parent(s) or legal guardian. The director or supervisor shall ensure that all such completed medical release forms are on campus and immediately accessible at all times during the Event. Before the On-Campus Program commences, the director or supervisor shall provide to the Associate Dean of Students (Marc Welch), Director of Safety and Security (Tom Kearns), and Director of Athletics and Campus Wellness (Matt Tanney or his designee) a roster of the names and contact information of all persons who will participate in the On-Campus Program, whether as supervisors, participants, or in any other capacity.