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Youth Protection Policy

Introduction:

The Youth Protection Policy (Policy) aims to take affirmative steps to safeguard and protect minor children who visit the University of Oklahoma (OU), participate in OU-sponsored programs on and off OU property, or participate in third party programs and activities that utilize OU property.

The Policy applies to all faculty, staff, students, vendors, volunteers, and visitors of OU who work with youth in OU-sponsored programs or who participate in third party programs and activities that utilize OU-owned or leased property used or otherwise controlled by OU.

It is the Policy of OU to provide a safe, fun, and productive educational environment for youth on campus to participate in various campus-sponsored events, third party-hosted events, or visiting of faculty, staff, and students. Therefore, any youth on any OU property will be supervised by an adult at all times. Procedures for hosting an event with youth or receiving permission for a youth to be on campus are outlined in the next section.

Definitions:

1. Youth:
Any individual under the age of 18
2. High-Risk Areas:
Any area that contains an unusually high risk to youth. Examples include but are not limited to:
 - a. Buildings

- b. Laboratories
 - c. Stairwells
 - d. Rooftops
 - e. Shops
 - f. Studios
 - g. Weight rooms
 - h. Mechanical rooms
 - i. Power plants
 - j. Garages
 - k. Patient care areas
 - l. Animal facilities
 - m. Food preparation areas
 - n. High-security areas
 - o. Motorized equipment
 - p. OU Vehicles such as boats, aircraft, snow machines, grounds equipment, and farm equipment
 - q. Any areas containing power tools or machinery with exposed moving parts
3. Events:
Campus events, camps, or activities
4. OU-sponsored events, camps, or activities:
Events that occur on campus and off-campus which are managed and/or controlled by an OU college or department.

Policy:

1. The safety of youth on campus is of utmost importance to OU. If you have questions about the following procedures, please contact the Office of Enterprise Risk Management. OU reserves the right to cancel a scheduled Event at any time if OU policy is violated in any way.
2. Reporting Obligations for sexual misconduct, child abuse, and neglect
 - a. Any individual who suspects that a youth is the victim of abuse or neglect must immediately report it to the Oklahoma Department of Human Services (DHS). (See 10A O.S. §§ 1-2-101(B)(1)(4)).
 - b. The (DHS) hotline for reporting is 1-800-522-3511.
 - c. After making the required report to the DHS, the individual must contact the relevant campus police department and the respective campus's Title IX office to report any sexual misconduct. Employees must notify their supervisor of any suspicions. One does not have to know with certainty that abuse or neglect is taking place. Reasonable cause to believe or suspect that child abuse or neglect has occurred is sufficient. When in doubt, report it.

3. Bringing Youth to OU

- a. Youth must always be in line-of-sight supervision by a parent/guardian, faculty/staff member, or by the supervising adult of on-campus programs.
- b. Youth are not allowed in High-Risk Areas.
- c. Youth must not interfere with OU business, including in academic and non-academic settings.
- d. Employees:
 - i. Prior approval from an employee's supervisor is required to bring youth to the workplace. Not all work environments are conducive to children because of the location or type of work performed. In those cases where bringing the youth to work may not be an option, employees must discuss their needs with their supervisors and Human Resources to see what alternative options are available (i.e., PTO, FMLA).
 - ii. If approved by the employee's supervisor, an employee may occasionally bring a youth to work for the employee's convenience or due to a family emergency, but never regularly or in lieu of childcare.
 - iii. Exceptions to the above restrictions on having youth in the workplace on a longer-term basis or in visiting restricted, High-Risk Areas may be granted at the discretion of the requesting employee's unit supervisor, manager, dean, or director, and only under the following circumstances:
 1. Employees must discuss their needs with their supervisors and Human Resources to see what alternative options are available (i.e., Remote work, PTO, FMLA).
 2. No risks of injury or illness more than everyday risks are present in the workplace.
 3. No significant disruption of the working environment of either the requesting employee or other employees will occur.
 4. The requesting employee signs a release waiving claim of liability against OU for those areas in which the employee allows the youth access. Please contact the respective campus's Office of Enterprise Risk Management for further guidance and release.
 5. An exception, if granted, may be revoked at any time without cause or explanation by the supervisor, manager, dean, director, Human Resources, or the Office of Enterprise Risk Management.
- e. Students:

Youth are not allowed in classrooms with the student while classes are in session unless permission is granted in advance by the faculty member. If a youth becomes disruptive, the faculty member may require the student and youth permitted in class to leave.

4. Youth Enrolled at OU

This Policy does not apply to youth who are enrolled in OU courses. OU faculty and staff are

encouraged to be aware of any student's status as a youth.

5. Required Youth Protection Training

- a. OU employees assisting with OU-sponsored events, camps, or activities must complete the Youth Protection training through OU's OnPoint learning management system. Please contact the respective campus's Office of Enterprise Risk Management for more information on training and required forms.
- b. All Third Party Groups and OU students that host any virtual event, activity, or camp aimed at youth or have staff/volunteers who are youth must adhere to the OU's Youth Protection Policy. All Third Party Groups and students who host these activities aimed at or including youth, MUST complete OU's Youth Protection training and submit all required forms. For more information on the Youth Protection Policy and training contact the Office of Enterprise Risk Management for the respective campus.
- c. For Events hosted at OU Norman, visit <https://www.ou.edu/risk> and for Events hosted at OUHSC and OU-Tulsa, visit <https://risk.ouhsc.edu>.

6. OU-Sponsored Events, Camps, Activities

For all OU-sponsored Events, the online Report Your Event form must be submitted to the Office of Enterprise Risk Management.

a. Supervision

i. Head Supervisor

The sponsoring department shall designate at least one person as a Head Supervisor and provide his or her contact information to the respective campus's Office of Enterprise Risk Management. The Head Supervisor will oversee the Event Supervisors. The Head Supervisor must ensure all youth are properly supervised and shall be the point of contact between the Event and OU.

ii. Every youth must be supervised AT ALL TIMES while that youth is participating in the Event.

iii. OU generally requires a minimum of at least one adult supervisor for every 12 youth. However, depending on the age of the youth and the Event, higher or lower supervision ratios may be advisable or applicable as determined by the supervisor over the area or upon consultation with the respective campus's Office of Enterprise Risk Management.

1. Supervision is defined as having the youth within line-of-sight.
2. Supervisors must be at least 18 years old. Youth may not supervise other youth.
3. Youth should not be secluded with the supervisor. Where receiving individualized instruction or laboratory experience, the youth must either be accompanied by an adult or, if the instructor, acting as a supervisor, is alone with the youth, the instructor must ensure they are in a location where others can see the instructor and the youth (e.g., windows, an open door) or in an area frequented by other people with no expectation of

privacy (a laboratory used by other faculty or students).

4. Youth must use the buddy system for restroom breaks and must check in and out with the supervisor for restroom breaks.
5. Supervisors and adults working the Event should not use verbal abuse, bullying, aggressive behavior or inappropriate consequences as a form of discipline.
6. Supervisors must provide for the basic needs of youth while involved in the Event.
7. All adults working the Event must not engage in inappropriate behavior that could cause harm or be misinterpreted as possibly causing harm. Examples of inappropriate behaviors include but are not limited to:
 - a. One-on-one contact with youth outside the presence of others.
 - b. Touching youth in a manner that a reasonable person could interpret as inappropriate.
 - c. Use, possession, or being under the influence of alcohol or illegal drugs while working a campus program for youth.
 - d. Being alone in a vehicle with youth at any time.
 - e. Making sexual materials in any form available to youth participating in programs or activities or assisting them in any way in gaining access to such materials.
 - f. Meeting with youth outside of established times for Event activities.
 - g. Engaging or communicating with youth through e-mail, text messages, social networking websites, internet chat rooms, or other forms of social media for non-Event related communications.
 - h. Verbal abuse, striking, hitting, punching, poking, spanking, or restraining. If restraint is necessary to protect a youth, all incidents must be documented and reported to the Event Director and youth's parent/guardian.

iv. Overnight Events

Where youth are staying overnight, either on campus or at an off-campus location, the Head Supervisor must provide a schedule of who is on call and provide contact numbers to the appropriate OU representative. A sufficient number of supervisors must be available on the floor to be aware of activity in the rooms, in the corridors, and/or near the exits throughout the night.

v. Laboratory Activities

When youth are permitted into OU laboratories as volunteers for an educational experience, the faculty member sponsoring the youth (the “Mentor”) should comply with the additional requirements set forth in the required forms, including providing appropriate training. If the youth will be working in a laboratory involved in animal research, the faculty member must also ensure compliance with all Institutional Animal Care and Use Committee (“IACUC”) policies that may be applicable. IACUC policies may be found here: <https://compliance.ouhsc.edu/iacuc/>.

b. Background Checks

i. Criminal and sexual offender background checks

Each employee, student, or volunteer who acts as a supervisor of youth and any individual who has substantial contact with youth must have successfully passed a criminal and sexual offender background check within the year preceding the Event. Until a clear background check is received, the employee or volunteer may not supervise or have substantial contact with youth. Background checks for employees and OU volunteers must be conducted through OU’s Human Resources department. OU colleges and departments can submit a paperless request to their respective campus’s Human Resources department to complete their volunteers’ background checks.

ii. A parent/guardian may not supervise youth other than their child unless they have complied with Section VI.F.2.i. as stated above.

iii. Student Misconduct checks

Each OU student working at the Event must have successfully completed a check through the OU Student Conduct Office within the past six (6) months.

1. For Norman campus students, please contact OU’s Director of Student Conduct at <https://www.ou.edu/studentconduct>.
2. For HSC campus students, please contact the Office of Student Affairs at <https://students.ouhsc.edu/hsc-student-affairs>.
3. For Tulsa campus students, please contact the Office of Student Affairs at <https://www.ou.edu/tulsastudentaffairs>.
4. Successful completion of a Student Conduct Office check means that, generally, a student has no student code violations and has not been charged with any such violations within the past six (6) months. Please note that it takes approximately five (5) business days for the Student Conduct Office to conduct these checks. Students must also be in good standing with their college. Please contact the appropriate Student Dean to determine whether the student is in good standing with his/her college.

c. Campus Security Authorities (CSA) and Clery Reporting

Head Supervisors and other OU employees supervising youth may need to become a

Campus Security Authority (CSA) and complete Clery training. CSAs are required by federal law to report any allegations of Clery Act Crimes they receive to the respective campus's OU Police Department. Please contact the respective campus's Office of Enterprise Risk Management for more information on training and requirements.

- i. For a better understanding of CSA role and responsibilities:
<https://www.ou.edu/clery/campus-security-authorities>
- ii. Reporting crimes to OU Norman PD: <https://www.ou.edu/clery/reporting>
- iii. Reporting crimes to OUHSC PD: call 405-271-4911
- iv. Reporting crimes to OU Tulsa PD: call 918-660-3900

d. Transportation

- i. Drop-Off & Pick-Up
Drop-off and pick-up schedules and locations must be supervised. Youth may not be released to anyone other than the person(s) listed on the registration form, including a relative or someone claiming to be a relative. Proper identification of approved persons must be provided to the Event staff. Parents must give permission in writing for their youth to transport himself/herself or ride with another person to and from the Event. If the youth is not picked up at the appropriate time, please contact the respective campus's OU Police Department.
- ii. Transporting Youth
Only Event supervisors over the age of 21 who have completed a Department of Motor Vehicles background check may transport youth. Motor vehicle background checks for employees and OU volunteers must be conducted through the respective campus's Human Resources department. Supervisors who transport youth must avoid any situation where they would be alone in a vehicle with a youth. All Event supervisors must comply with applicable laws and OU policies regarding transportation and motor vehicle use.

e. Security and Safety Measures

- i. Supervisors should ensure youth of the Event are identified as part of the group in a manner appropriate to the participant's age and the nature of the Event. (e.g., name tags with the Event name and contact information on their person).
- ii. Departments must ensure all staff and Event supervisors have been briefed by the Head Supervisor regarding all security measures in place to protect youth (including inclement weather procedures and fire & safety evacuation procedures). At the start of each Event, youth should be informed of where to go or what to do if they need help. For multi-day Events, information should be provided or available each day.
- iii. If medical information about youth is collected, it must be securely stored and should not be shared or made publicly accessible.

f. Virtual Events

Adults should be positive role models for youth and act in a caring, honest, respectful, and responsible manner consistent with OU's mission and guiding principles. The risks and challenges associated with working with youth in person are also present when working with youth online. Adults working with youth online must follow these expectations to avoid behaviors that could cause harm or be misinterpreted.

- i. Do not have one-on-one interactions with youth. All virtual programs must have at least one other adult or youth participating in the program.
- ii. Do not engage or communicate with youth through email or 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 or activity. When communicating electronically, you must copy another program staff member or the youth's parent/guardian.
- iii. Do not wear unprofessional or inappropriate attire when interacting with youth online. A few examples of inappropriate attire include, but are not limited to, the following: tight or revealing clothing; clothing with names or photos of Alcoholic Beverages; clothing with pictures or words depicting violence, lewd sexual acts, profanity, or racism.
- iv. Do not display an unprofessional or inappropriate background when interacting with youth online, such as inappropriate images or words on the wall or the virtual background.
- v. Do not meet with youth in person unless the in-person meeting was a part of the program curriculum approved by the Head Supervisor. Any exceptions require authorization by the Head Supervisor and written authorization by the youth's parent/guardian. The meeting must include more than one adult from the program or activity.
- vi. Do not allow unsupervised interactions between youth during the virtual programming, such as in breakout rooms.
- vii. Immediately stop cyberbullying or any disrespectful comments or inappropriate images once you are aware of such activities.
- viii. Do not tell a youth, "This is just between the two of us," or use similar language that encourages youth to keep secrets from their parent/guardian.
- ix. Recording virtual interactions, such as class instruction and office hours, may allow the youth and parents/guardians to review the instructional materials later. If the program or activity intends to record any virtual interactions, you must ensure that youth and parents/guardians are notified in advance and that the appropriate Youth Protection virtual event protocols and release forms are signed. To access these forms:

1. For OU Norman, visit <https://www.ou.edu/risk>

2. For OUHSC and OU-Tulsa, visit <https://risk.ouhsc.edu>.
3. Virtual meeting spaces should be set to private, and individuals who have not been invited to the meeting cannot enter the virtual space.
4. Avoid posting any meeting links on public sites.

g. Forms and Contact Information

- i. Each Head Supervisor must provide contact information for the Event and all scanned copies of the executed forms to the respective campus's Office of Enterprise Risk Management prior to the event. All the scanned event forms shall be submitted together under the event name. The respective campus's Office of Enterprise Risk Management will maintain a digital repository of all executed forms. Any OU department sponsoring the event should retain their copies of the forms for as long as they are needed.
- ii. The Head Supervisor shall ensure all applicable forms have been completed and provide scanned copies of the executed forms to the Office of Enterprise Risk Management: Norman Campus programs: youthprotection@ou.edu or OUHSC and OU-Tulsa Campus programs: youthprotection@ouhsc.edu.
 1. Ensure each Event supervisor executes the Event Protocol and Acknowledgment Form(s). Please note that the form may need some modification to reflect the details of a particular Event.
 2. Ensure the parents or legal guardians of the youth attending the Event execute a Youth Release Form. Again, this may need modification.

7. Events Involving Youth that are Sponsored by Third Parties

- a. Third Parties may contract with OU to use OU space to host Events that include youth. OU departments that agree to provide space must designate a departmental contact person responsible for communicating OU requirements to the Event's Third Party Sponsor ("Sponsor"). Sponsors shall appoint a Head Supervisor who shall be responsible for ensuring adequate supervision of the youth throughout the Event and who shall be the point of contact for OU for any issues that arise during the Event.
 - i. Every youth must be supervised AT ALL TIMES while that youth is participating in the Event.
 - ii. OU generally requires a minimum of at least one adult supervisor for every 12 youth. However, depending on the age of the youth and the Event, higher or lower supervision ratios may be advisable or applicable as determined by the supervisor for the Event or upon consultation with the campus Enterprise Risk Management office
 1. Supervision includes having the youth within line-of-sight.
 2. Supervisors must be at least 18 years old. Youth may not supervise other youth.

3. Youth should not be secluded with a supervisor. Where receiving individualized instruction or laboratory experience, the youth must either be accompanied by an adult or, if the instructor, acting as a supervisor, is alone with the youth, the instructor must ensure they are in a location where others can see the instructor and the youth (e.g., windows, an open door) or in an area frequented by other people with no expectation of privacy (a laboratory used by other faculty or students).
4. Youth must use the buddy system for restroom breaks and must check in and out with the supervisor for restroom breaks.
5. Supervisors and adults working the Event should not use verbal abuse, bullying, aggressive behavior or inappropriate consequences as a form of discipline.
6. Supervisors must provide for basic needs of youth while involved in the Event.
7. All adults working the Event must not engage in inappropriate behavior that could cause harm or be misinterpreted as possibly causing harm. Examples of inappropriate behaviors include but are not limited to:
 - a. One-on-one contact with youth outside the presence of others.
 - b. Touching youth in a manner that a reasonable person could interpret as inappropriate.
 - c. Use, possession, or being under the influence of alcohol or illegal drugs while working a campus program for youth.
 - d. Being alone in a vehicle with youth at any time.
 - e. Making sexual materials in any form available to youth participating in programs or activities or assisting them in any way in gaining access to such materials.
 - f. Meeting with youth outside of established times for Event activities.
 - g. Engaging or communicating with youth through e-mail, text messages, social networking websites, internet chat rooms, or other forms of social media for non-Event related communications.
 - h. Verbal abuse, striking, hitting, punching, poking, spanking, or restraining. If restraint is necessary to protect a youth, all incidents must be documented and reported to the Event Director and youth's parent/guardian.

b. Background Checks:

- i. Criminal and sexual offender background checks: Each person who acts as a supervisor or who has substantial contact with youth must have successfully passed a criminal and sexual offender background check within the year preceding the Event. For information on obtaining a criminal and sex offender background check, contact the Oklahoma State Bureau of Investigations <https://osbi.ok.gov>
- ii. A parent/guardian may not supervise youth other than their child unless they have complied with Section VI.G.2.i above.
- iii. Student Misconduct checks
Each OU student working at the Event must have successfully completed a check through OU's Student Conduct Office within the past six (6) months.
 - 1. For Norman campus students, please contact OU's Director of Student Conduct at <https://www.ou.edu/studentconduct> .
 - 2. For HSC campus students, please contact the Office of Student Affairs at <https://students.ouhsc.edu/hsc-student-affairs> .
 - 3. For Tulsa campus students, please contact the Office of Student Affairs at <https://www.ou.edu/tulsastudentaffairs>

Successful completion of a Student Conduct Office check means that a student has no student code violations and has not been charged with any such violations within the past six (6) months. Please note that it takes approximately five (5) business days for the Student Conduct Office to conduct these checks. Students must also be in good standing with their College. Please contact the appropriate Student Dean to determine whether the student is in good standing with their College.

- c. Campus Security Authorities (CSA) and Clery Reporting
Head Supervisors and other OU employees supervising youth may need to become a Campus Security Authority (CSA) and complete Clery training. CSAs are required by federal law to report any allegations of Clery Act Crimes they receive to the respective campus's OU Police Department. Please contact the respective campus's Office of Enterprise Risk Management for more information on training and requirements.
 - i. For a better understanding of CSA role and responsibilities: <https://www.ou.edu/clery/campus-security-authorities>
 - ii. Reporting crimes to OU Norman PD: <https://www.ou.edu/clery/reporting>
 - iii. Reporting crimes to OUHSC PD: call 405-271-4911
 - iv. Reporting crimes to OU Tulsa PD: call 918-660-3900
- d. Security and Safety Measures
 - i. Supervisors should ensure youth of the Event are identified as part of the group in a manner appropriate to the participant's age and nature of the Event. (e.g. name tags with the Event name and contact information on their person).

- ii. Third Party must ensure all staff and Event supervisors have been briefed by the Head Supervisor regarding all security measures in place to protect youth (including inclement weather procedures and fire & safety evacuation procedures). At the start of each Event, youth should be informed of where to go or what to do if they need help. For multi-day Events, information should be provided or available each day.
 - iii. If medical information about youth is collected, it must be securely stored and should not be shared or made publicly accessible.
- e. Third Party must sign a Facilities Use Agreement, which should be provided by the OU department from which the Third Party is leasing space. Facilities Use Agreements must include the cost of the leased space, the minimum insurance requirements, and liability and indemnification language protecting OU from claims that may arise out of the Event. The Facilities Use Agreement must be signed by the appropriate OU representative who has signatory authority to sign such agreements.
- f. The sponsoring organization shall maintain insurance amounts sufficient to cover its responsibilities and liabilities, including but not limited to General Liability and Sexual Misconduct and Molestation Liability, with minimum insurance limits as set by the Office of Enterprise Risk Management. Such insurance is required for all overnight camps and day camps of a certain duration. Please contact your respective campus's Office of Enterprise Risk Management to determine if insurance is required and the required insurance limits. For state agencies covered by the Oklahoma Governmental Tort Claims Act, the OMES State Risk Management Verification letter, evidencing their self-insurance coverage, is sufficient to satisfy this requirement for General Liability.
- g. The Sponsor of the Event must execute an Event Acknowledgment form. Please note that the form may need to be modified for specific needs or may be inapplicable depending on the situation. The OU department representative should contact the respective campus's Office of Enterprise Risk Management for assistance if needed.

Please Note: Registered Student Organizations (RSOs) must complete an Event Acknowledgment form revised to appropriately identify the organization or a substantially similar document.

- h. The Sponsor must ensure that a parent or legal guardian of each youth attending the Event executes a Release Form. Again, this may need modification or may be inapplicable depending on the situation.
- i. Each Sponsor must provide contact information for the Event and submit all executed forms electronically to the respective campus's Office of Enterprise Risk Management prior to the event.
 - i. For the Norman campus, submit to: youthprotection@ou.edu.
 - ii. For HSC and Tulsa campuses, submit to: youthprotection@ouhsc.edu.
 - iii. All the event forms shall be submitted electronically together under the Event name. Last-second submissions are acceptable; however, all efforts should be made to avoid this practice. If the event involves athletics or the

use of the fitness center, recreation fields, pool, or golf course on the Norman campus, the contact information and executed forms must be provided to the Event Management Office of the Department of Athletics, OU Fit, and Rec, or Jimmie Austin Golf Club. These offices will maintain all executed forms.

8. Youth Protection in K-12 Programs, Field Trips, or Similar Types of School/ Extracurricular Group Tours/Events

Where youth are on campus due to a field trip sponsored by a K-12 school or similarly sponsored event ("Field Trip"), the OU contact must ensure a contact person for the K-12 school is identified, must obtain essential information for the event, and must advise the campus Enterprise Risk Management office of all this information

- a. The Field Trip location must be inspected either by appropriate OU officials for safety purposes (e.g., facilities management or lab supervisor where students are touring the lab facility).
- b. Employees in the area must be made aware of the youth's presence in the area and advised to report any issues or suspicious activity to the OU contact, the respective campus's Office of Enterprise Risk Management, and/or DHS, campus PD, and the Sexual Misconduct Officer, as appropriate.
- c. Group Tours/Field Trips
Groups that wish to tour the OU campus must complete a Group Visitation Form and provide it to the OU department providing the tour. OU departments must provide this completed form to the respective campus's Office of Enterprise Risk Management twenty-four (24) hours prior to the tour.
 - i. For the Norman Campus, submit to youthprotection@ou.edu.
 - ii. For the HSC and Tulsa campuses, submit to youthprotection@ouhsc.edu.

Approval Authority:

President

Former Policy Number:

6.2.2.1

Approval Signatures

Step Description	Approver	Date
	Cody Pilgreen: Paralegal	02/2025