



## **Participation of Minors in WPI Programs Policy**

### **I. Policy Statement**

WPI is committed to protecting the safety and well-being of all members of its community, including minors who are participating in events, activities, or programs on campus, off-campus, or online that are run by WPI or by a third-party sponsor through WPI or on WPI's behalf.

This Participation of Minors in WPI Programs Policy establishes guidelines for those in the University community who work or interact with minors, to increase awareness of minor abuse and neglect and to require reporting.

### **II. Scope**

This policy applies to all events, activities, or programs on campus, off-campus, or online under the authority or direction of WPI (collectively, "Programs") in which children under the age of 18 ("Minors") participate.

With the exception of (i) Minors who are enrolled as full-time students at WPI (to which all other WPI policies apply); (ii) Minors who are high school students enrolled at Massachusetts Academy of Math and Science (to which all Mass Academy policies apply); (iii) Programs attended by Minors who are accompanied by a parent/guardian, or (iv) Minors who are participating in any WPI Institutional Review Board-approved research activity this policy applies to all instances in which Minors are participating in Programs on campus, off-campus, or online.

This includes all types of Programs, including without limitation:

- Athletic camps, academic camps, high school recruiting events, and other similar activities;
- Online programs or events run by WPI, as well as those run by third-party sponsors online through WPI or on WPI's behalf; and
- In-person programs or events run by WPI, as well as those run by third-party sponsors on campus or off-campus through WPI or on WPI's behalf.

This policy applies to all members of the WPI community, including without limitation:

- WPI faculty, staff and students;
- Volunteers, contractors and vendors working on campus or working for the university off-campus or online; and
- Third-party sponsors who run events or programs on campus, off-campus, or online through WPI or on WPI's behalf.

This policy applies at all times, including without limitation:

- Programs run before, during or after business hours, and overnight; and



- Programs that are for a single instance, over a period of time, or recurring.

### III. Policy

All Programs must abide by the following requirements:

#### 1. **Apply and Obtain Approval for the Program**

The person in charge of the Program or their designee (“Program Director”) must submit a [Program Registration Form](#) online at least sixty (60) days prior to the Program’s start date.

The Program Registration Form will be reviewed and approved by a committee chaired by the Director of Pre-Collegiate Outreach Programs. The Committee will review the Program Registration Form and ensure that the Program Director is taking steps to meet the requirements of this Policy.

#### 2. **Execute Appropriate Written Contract(s)**

For all Programs, the parent/guardian of each Minor must execute a **Participant Waiver and Permission Form**.

- **For Programs sponsored by WPI**, there is a [form](#) for Programs offered primarily online and a [form](#) for Programs offered primarily in person.
- **For Programs sponsored by a third-party**, a participant waiver and permission form required by the third-party sponsor and must meet the requirements of this Policy. The third-party sponsor must provide evidence to WPI that a participant waiver and permission form was obtained from the parent/guardian of each Minor. WPI may request any additional information it deems necessary to ensure that the third-party sponsor has met the requirements of this Policy.

In addition, third-party sponsors must execute a written contract with WPI if the Program will make use of any university facilities, including but not limited to athletic, housing or dining facilities. If you have any questions about, or need assistance with, this requirement please contact the Office of the General Counsel at [ogc@wpi.edu](mailto:ogc@wpi.edu).

#### 3. **Conduct Background Checks**

The Program Director, whether the Program is sponsored by WPI or a third-party sponsor, must ensure that a **background check** is conducted on all Program Directors and supervisors, and all adults who will have **direct and unmonitored contact** with Minors during the course of the Program, including but not limited to faculty, staff, students, consultants, contractors, vendors, and volunteers.



The background check must include a criminal state search (including a CORI Required 2 or 3 access, if applicable, in Massachusetts), a federal and national search and a national sex offender registry search for all participants.

- **For Programs sponsored by WPI**, the background checks will be conducted by an agency selected and approved by Talent & Inclusion in accordance with the Background Check Policy located in the WPI Employee Benefits and Policies Manual. The cost for the background check(s) will be borne by the department, activity, or program responsible for the Program.
- **For Programs sponsored by a third-party**, the background checks will be conducted by the third-party sponsor and must meet the requirements of this Policy. The third-party sponsor must provide evidence to WPI that a background check was completed on all Program Directors and supervisors, and all adults who will have direct and unmonitored contact with Minors. WPI may request any additional information it deems necessary to ensure that the third-party sponsor has met the background check requirements of this Policy.
- Anyone who is required by this Policy to have a background check is under a continuing obligation to disclose immediately any new felony or misdemeanor convictions to the Program Director.

A background check must be completed and evaluated prior to an adult beginning work with Minors. Background checks for WPI faculty, staff, and students must be renewed after **four (4) years**.<sup>1</sup> Background checks for third-party sponsors and any volunteers, contractors, and vendors must be renewed **annually**, unless otherwise agreed in writing between WPI and the third-party sponsor.

#### 4. Provide Training

In recognition of the imperative of protecting Minors, WPI **requires** that all adults working with Minors received training on policies and issues relating to interactions with Minors.

This training should include:

- WPI policies regarding interactions with Minors;
- Setting up an online Program for Minors, including the appropriate use of Zoom, Canvas, and similar educational programs with Minors (where applicable);
- Use of background checks to screen adults working with Minors;
- Responsibility for modeling respectful behaviors;
- Consequences of conduct violations involving Minors;

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<sup>1</sup> WPI faculty and staff who are part-time or who have a break in service of more than six (6) months, and WPI students who withdraw, are suspended or dismissed, or who take a leave of absence of six (6) months or more, will be required to renew their background check **annually**.



- Warning signs of abuse or neglect that Minor victims may exhibit;
- Sexual abuse and sexual harassment;
- Laboratory safety for Minors (where applicable);
- Inappropriate behavior with Minors;
- Other appropriate topics; and
- Reporting requirements and procedures for reporting incidents of suspected abuse, neglect, or improper conduct.

The [“Protecting Children Learning Program”](#) offered by United Educators meets the requirements of this Policy.

- All adults working with Minors must complete the “Identifying and Reporting Sexual Misconduct” and “Shine a Light (10 minute video for higher ed)” modules.
- All Program Directors and supervisors must also complete the “Hiring Staff Who Work With Minors” module.

Third-party sponsors are encouraged to complete the United Educators training. In the alternative, any training conducted independently by the third-party sponsor must include the requirements above. The third-party sponsor must provide evidence to WPI that such training was completed, and WPI may request any additional information it deems necessary to ensure that the third-party sponsor has met the training requirements of this Policy.

Training must be completed prior to an adult beginning work with Minors. Training for WPI faculty, staff, and students must be completed every **four (4) years**.<sup>2</sup> Training for third-party sponsors and any volunteers, contractors, and vendors must be completed **annually**, unless otherwise agreed in writing between WPI and the third-party sponsor.

## 5. Establish Behavioral Expectations

Adults should be positive role models for Minors, and act in a caring, honest, respectful and responsible manner that is consistent with the mission and guiding principles of the university.

Adults working in Programs covered by this policy must follow these expectations to avoid behaviors that could cause harm or be misinterpreted:

- Do not engage in any sexual activity, make sexual comments, tell sexual jokes, or share sexually explicit material (or assist in any way to provide access to such material) with Minors in-person or online.

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<sup>2</sup> WPI faculty and staff who are part-time or who have a break in service of more than six (6) months, and WPI students who withdraw, are suspended or dismissed, or who take a leave of absence of six (6) months or more, will be required to complete the training **annually**.



- Do not be alone with a single Minor in-person or online. All Adults who have direct and unmonitored contact with Minors during the course of the Program must have a background check.
  - If one-on-one interaction is required in-person, meet in open, well illuminated spaces or rooms with windows observable by other adults from the Program, unless the one-on-one interaction is expressly authorized by the Program Director, dean, department chair person or is being undertaken by a health care provider.
  - If one-on-one interaction is required online, obtain written authorization from the parent/guardian unless the one-on-one interaction is expressly authorized by the Program Director, dean, department chair person or is being undertaken by a health care provider.
- Do 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.
- Do not invite individual Minors to your home. Any exceptions require authorization by the Program Director and written authorization by a parent/guardian.
- Do not engage or allow Minors to engage you in romantic or sexual conversations, or related matters, unless required in the role of resident advisors, counselors, or health care providers.
- Do not engage or communicate with Minors through private 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 and WPI. Group messages and posts are acceptable and must be viewable by all participants and the Program Director.
- Do not touch Minors in a manner that a reasonable person could interpret as inappropriate. 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 (i.e., treatment of an injury) purpose. Any resistance from the Minor should be respected.
- Do not engage in any abusive conduct of any kind toward, or in the presence of, a Minor, including but not limited to verbal abuse, striking, hitting, punching, poking, spanking, or restraining. If restraint is necessary to protect a Minor or other Minors from harm, all incidents must be documented and disclosed to the Program Director and the Minor's parent/guardian.
- Do not use, possess or be under the influence of, or display any alcohol or illegal drugs while on duty, when responsible for a Minor's welfare, or when interacting with Minors online.
- When transporting Minors in a Program, more than one adult from the Program must be present in the vehicle, except when multiple Minors will be in the vehicle, at all times through the transportation. Avoid using personal vehicles if possible.



- Possession, use or display of any type of weapon or explosive device is prohibited.
- Do not engage Minors in activities involving hazardous materials (chemical, biological, radiation) or work with mechanical tools at home during an online Program.
- Photographing, videotaping and/or audiotaping minors during a Program is prohibited. Any exceptions require authorization by the Program Director and written authorization by a parent/guardian.
- Do not permit hazing, harassment, or any type of bullying behavior, including cyberbullying, during the Program.

All adults working with Minors are required to sign the **Behavioral Expectations Acknowledgement Form** that reviews the behavioral expectations of this Policy. There is a [form](#) for Programs offered primarily online and a [form](#) for Programs offered primarily in person. The form must be completed prior to an adult beginning work with Minors.

## 6. Reporting Allegation(s) of Inappropriate Behavior

**“If you see something, say something”.**

Every member of the university community (“Member”) has an obligation to report immediately instances or suspected instances of the abuse or neglect of or inappropriate interactions with Minors to the WPI Police Department and to the Program Director. This includes information about suspected abuse, neglect, or inadequate care provided by a parent, guardian, or custodian/caretaker.

The WPI Police Department can assist in determining whether additional reporting may be required, such as mandated reporting to the Massachusetts Department of Children and Families (DCF), and can assist in making such reporting.

WPI will protect the anonymity of the member(s) making the report to the extent possible. Members making a report in good faith will be protected from criminal and civil liability for making the report. Further, it is the policy of the university that no Member making a good faith report of suspected abuse or neglect will be retaliated against in the terms and conditions of employment or educational program.



#### IV. Questions

If you have any question regarding this policy, please contact the Office of the General Counsel at [ogc@wpi.edu](mailto:ogc@wpi.edu).

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**Policy Sponsor:** General Counsel

**Responsible Department:** Office of the General Counsel

**Effective Date (i.e., date of Presidential Approval):** November 19, 2020

**Revision Date:** April 14, 2020 (interim); November 19, 2020