

2021



Protection of Minors Policy Handbook

Vanderbilt Personnel Are

*Responsible for the **Protection Of Minors***

Report any red flag behavior or conduct code violations.

Prevent opportunities for abuse to occur.

Observe minors and adult interactions for red flag behavior.

Manage a good program (in hiring, scheduling, training, and follow up).

**Office of Risk and Insurance
Management, Protection of
Minors**

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By adopting the Protection of Minors (POM) Policy in the Spring of 2013, Vanderbilt University Administration emphasized the importance of following state law, regulatory compliance, and safeguarding the youth who interact with Vanderbilt faculty, staff, students, and volunteers. This document operationalizes the POM Policy through procedures for programs and operations and is intended to advise coordinators and leaders on further steps to implement the POM Policy. If you have any questions about the procedures in this Handbook, please contact the Office of Risk and Insurance Management, Protection of Minors, at 615-936-5935 or protectionofminors@vanderbilt.edu.

Mandatory Reporting of Child Abuse

Tennessee Code Annotated 37-1-403

By Tennessee law, it is the obligation of any person who suspects a child (defined as under 18 years of age) is being/has been abused to report it to a state law enforcement, juvenile court, or child protection agency. This can be a police agency, such as VUPD, Metro Nashville Police Department, another local law enforcement agency, where the child resides (if known) or the State Child Abuse Reporting Hotline. Failure to report child abuse in Tennessee is a Class A misdemeanor crime. Intentionally failing to report known child sexual abuse is a felony in Tennessee. Personnel who report in good faith are protected from criminal/civil liability for making a report.

In addition, it is Vanderbilt University policy that university faculty, staff, students, and volunteers must report internally any suspicion of child maltreatment or conduct code violations, including abuse to a minor on campus or in a VU program, to The Office of Risk and Insurance Management at 615-936-5935, the VU Occurrence reporting system, or the VU Hotline at 844-814-5935. Personnel failing to follow this policy of reporting suspected child abuse are subject to disciplinary action up to and including termination.

If you suspect a minor on campus or participating in a VU program is being abused by any person, report using these methods (in a life threatening emergency, call 911 first);
Dept. of Children’s Service (DCS) Abuse Hotline: 877-237-0004
OR VU Police Department: 615-322-2745 (or the law enforcement agency where the child resides)
AND
VU Office of Risk and Insurance Management: 615-936-5935 or (online) https://live.origamirisk.com/Origami/IncidentEntry/Welcome
OR VU Compliance Hotline: 844-814-5935 or https://www.vanderbilt.edu/compliance/helpline.php

When a report to DCS or Law Enforcement is made regarding suspected child maltreatment and/or abuse, the reporter might be asked the following:

- Name, age, and gender of the child victim
- Current risk status (is there an immediate threat of harm)
- Details of the incident; nature and extent of injury or mistreatment; how the abuse became known
- Location where behavior or actions occurred and current location of the victim



- If known, date/time of incident
- If known, perpetrator name, age, gender, and relationship to the victim
- Other related information known at this time

Reporters should not delay in making a report or concern if all the information is not available or obtained.

Protection of Minors Code of Conduct (Appendix A: Vanderbilt Protection of Minors Policy)

Code of Conduct for Interacting with Minors

You are required by Tennessee law and Vanderbilt University policy to report actual or suspected abuse or other improper conduct involving a Minor. You also are required to comply with the following code of conduct when interacting with Minors.

- Do not spend time alone, either on or off campus, with a Minor away from others. If one-on-one interaction is required, meet in open, well-lit rooms or spaces with windows observable by other adults from the Program.
- Do not engage in any sexual actions, make sexual comments, tell sexual jokes, or share or view sexually explicit material with or within the vicinity of Minors.
- Do not touch Minors in a manner that a reasonable person could interpret as inappropriate.
- Do not shower, bathe, or undress with or in the presence of a Minor.
- 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, hitting, punching, poking, or restraining, except as required to protect a Minor or others from harm. All incidents involving such conduct, whether or not required to protect a Minor or others from harm, must be documented and disclosed promptly to the Program Director and the Minor's parent/guardian.
- Be aware of the impact of your words and language on Minors.
- Do not use, possess, or be under the influence of alcohol or illegal drugs while on duty or when responsible for a Minor's welfare.
- Do not meet with Minors outside of established times for Program activities. Any exceptions require parental authorization and must include more than one adult from the Program.
- Do not engage or converse with Minors through email, text messages, social networking websites, or other forms of social media at any time except and unless there is an educational or programmatic purpose and the content of the communications is consistent with the mission of the Program and the university.
- 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.
- Do not tell children "this is just between the two of us" or use similar language that encourages Minors to keep secrets from their parent/guardians.



Section I. VU Programs Serving Minors Operational Expectations

1.01 Personnel/Staff Selection and Screening

All employment processes should be set up to recruit employees and others with healthy boundaries and a strong moral compass. These steps will increase awareness of a potentially dangerous person and ideally prevent them from engaging with minors. **The following are steps all programs should take to screen and select individuals engaging with minors.**

(a) Background Check

Prior to working with minors in a Vanderbilt program for minors, all candidates must agree to submit to and complete a criminal background clearance check and be checked in the sexual offender registry. In addition, applicants should be asked on an employment (or other) application if he/she has ever been accused of sexual misconduct or committed abuse to a child. Criminal records checks should cover at least seven years. Some programs will require a fingerprint clearance, depending on state and department procedures.

(b) Candidate Application and Screening: Consider the Following Red Flags for ALL Candidates when reviewing applications:

- Does the candidate only seek opportunities that would put him/her in a position to be alone with a minor?
- Does the candidate have interests outside of working with children, and socialize with adults?
- Are there any unexplained gaps in employment/volunteer service?
- Does the candidate demonstrate knowledge of expected and appropriate verbal, emotional and physical boundaries with children?
- Check a minimum of 2-3 references and ask if the reference would have any hesitation about this candidate working with children, and if the reference is aware of any past misconduct by the applicant.

(c) Interview

- Follow up on application questions about the candidate's interest in working with children.
- Ask the candidate scenario questions that would speak to their ability to resolve conflict, address abuse disclosure and the ability/willingness to report suspicious behavior to their supervisor (for example: "How would you respond if a child told you they had been hit?" or "What steps would you take if a child was reluctant to participate in an activity with other peers?").
- Tell the candidate about Vanderbilt's zero tolerance policy to prevent abuse to minors; ask the candidate if he/she has any experience in reporting a case of abuse or conduct concerns and to describe that experience.
- Ask the candidate to explain or respond in writing to any inconsistencies or potential red flag behavior that was identified in the screening phase.

(d) Transportation of Children

- Assess if the candidate will be transporting children. If so, complete a Motor Vehicle Record (MVR) check and require a driver training course.

(e) Re-screening of Personnel

- If you operate a program whose activities or events are seasonal or reoccurring on an un-specified basis, continue to screen and meet face to face where feasible with all who will be working with minors. Personnel Screening is NOT a one-time event prior to hire. Many perpetrators will use long time placement in a program to groom a child for future abuse and question supervision and boundary expectations if he/she has "been here forever." Remember that most children are abused by someone they know.



- **The Minimum re-screening policy for background check clearance at Vanderbilt is every FOUR (4) years for those who work with minors in VU programs and annual training on youth protection is required.**

1.02 Program Culture and Leadership

- (a) Prioritize Safety:** Physical and emotional safety for minors should be a priority which is reflected in personnel training and program operations. Leaders who dismiss the importance of policy compliance or minimize the importance of creating a safe environment for children and youth should be counseled, retrained, and/or transferred to another role.
- (b) Promote Discussion:** Personnel in the program should be encouraged to discuss the POM Policy, how the program culture reflects the university goals, and to reflect on procedures and response that can be improved to strengthen that protection.

1.03 Reporting Obligations and POM Code of Conduct

- (a)** Personnel should have a clear understanding on reporting injury, abuse, violations of the code of conduct with minors, and the sexual misconduct policy, all policy requirements, and Tennessee law.
- (b)** The incident reporting process should be clear to all personnel in program events and should include a process to report violations of the POM Code of Conduct, which may or may not rise to external reporting procedures. The reporting process also includes disclosures of abuse to a minor by non-Vanderbilt personnel or in the past. All POM Code of Conduct behavioral violations should be reported to the supervisor and to Risk and Insurance Management. Program personnel and supervisors may utilize the risk incident and occurrence reporting system to report these violations. [Please see section 1.14.](#)
- (c)** If misconduct is by a VU representative, the behavior should be addressed with the person and should cease immediately (this may include immediately removing the person from interaction with all minors). In cases of suspected misconduct with a minor, supervisors should contact their [Human Resources consultant](#) and the Risk Management POM [contact](#) and may be requested by HR to remove the individual from the job role or place them on administrative leave during the investigation process. Documentation should be preserved for a program personnel member who violates the POM Code of Conduct or is alleged to have acted inappropriately.
- (d)** Some POM Code of Conduct violations will necessitate DCS/VUPD reporting as required by law; ensure all personnel are trained and follow the requirements for [mandatory reporting](#) of child abuse.
- (e)** In addition to the POM Policy, program personnel should be trained on reporting obligations as stated in the policies related to [Title IX](#) (Sexual Misconduct Policy).
- (f)** Discussion regarding policy and program codes of conduct should be open, and personnel should be encouraged on how to abide by the POM Code of Conduct in situations specific to the program or activity (e.g., limits or prohibition on one-to-one engagement, limits on social media communication with minors, open door policy, two adult minimum in group).

Any program considering conducting operations that do not align with the POM Code of Conduct (such as one-on-one instruction or counseling) should communicate with Risk and Insurance Management for exceptions approval, program assessment and risk mitigation procedures.



1.04 Minor Participant Orientation, Behavior, and Discipline

- (a) **Participant Expectations:** Program documents should state clearly what is expected of participants and what activities will occur as part of the program. Programs should take into consideration the age, ability, experiences, and capabilities of the participants.
- (b) **Participant Orientation:** Participants should be oriented to the program through discussion of appropriate university requirements (this will depend on the location and nature of the program) and be informed of safety rules, appropriate conduct (theirs and the program personnel's), age appropriate discussion on boundaries, and what to do if the student is ever separated from the program or is made to feel uncomfortable by a faculty, staff, student, volunteer, or other participant in the program. Participant policies should include a no bullying component reflective of [TN law](#), as well as policies on physical affection and any contact between participating students, and between participants and program personnel. Orientation should include social media rules and regulations, prohibition of cell phone use in restrooms and locker rooms, and a “no secrets” discussion.
- (c) **Participant Discipline:** Discipline policy should never include any form of corporal punishment, demeaning, cursing, or belittling by program staff or students, or putting a minor in a location that would cause him/her potential harm. All participant discipline policies should be published in program documents and be given to parents as part of the program materials. Program personnel that violate any condition of the discipline policy should be interviewed and, if appropriate, counseled or dismissed from the program.
- (d) **Older Participating Youth**
- **Educate on Behavior Expectations:** Older youth (generally 14 and above) should be advised of all the program rules and expectations with regard to behavior and peer contact. This includes prohibition of any alcohol/substance use and inappropriate sexual behavior. Younger participants should also have a written set of expectations that match each activity planned and the expectations should be shared with parents prior to the start of the program.
 - **Prevention Program for Youth:** Harassment/sexual abuse prevention resources and reporting should be made available to participants and parents.
 - **Empower Youth to Report Red Flag Behavior:** Make sure older youth know how to report red flag behavior if needed, and what behavior constitutes a red flag from both adults and other youth.

1.05 Program Personnel Behavior

- (a) **POM Code of Conduct Adherence:** All program personnel (faculty, staff, VU students, and volunteers) shall adhere to the POM Code of Conduct in the POM Policy, and annually sign/indicate their agreement to follow its components. This is part of the Protection of Minors Annual Renewal Training module.
- (b) **Training for all Personnel:** Program personnel working with minors are required to complete annual training in the detection of abuse/sexual abuse/neglect of minors, reporting procedures, characteristics of abusers, boundary setting, and the VU POM Policy. Additional training specific to HR policies and each program should be created (see Sec. 1.06) – suggested topics include supervision of youth, resolving conflict, creating a learning environment, etc.
- (c) **Social Media, Electronic Communication, Virtual Programming and Internet Use:**
- Programs must adhere to Vanderbilt policies on social media and use of technology. This includes appropriate



use of approved IT online platforms used in virtual/remote programs. In addition, program personnel should not be permitted to use personal accounts to “friend” or “connect” or “follow” the personal pages of a minor participant in the program or share online gaming personal usernames. This prohibition should also apply to a minor participant’s engagement with the personal pages or accounts of program personnel. Social media pages that are public pages, created for the program or other VU programs, are the recommended sites where any social media interaction with minors should occur.

- Any communication with a minor in electronic format (via email or text) should be in a group mail/text format or include another program personnel or parent – this avoids any one-to-one communication.
- Personnel and supervisors should monitor the internet use of minors in the program and assure filters or blocked content/security options are enabled in those programs which allow minors to use University PCs or other electronic devices. Personnel should not access any site not appropriate for minors while in a supervision or monitoring role.

(d) Disciplinary Action of Personnel as a Result of Failing to Follow the POM Policy: In addition to potential external investigation, program personnel should understand that inappropriate behavior, maltreatment, or abuse of a minor may result in discipline up to and including dismissal from the program and termination of employment.

1.06 Training Beyond the Basics in POM Policy and Reporting

(a) VU program operations and/or programs may have a need for training beyond what is required by the POM Policy. Providing program personnel with additional training (in topics such as supervision, management of behavior, youth mental health, boundary setting) is encouraged. Please contact the Office of Risk and Insurance Management if you need assistance in identifying additional training materials or resources.

1.07 Scheduling and Transitions

(a) Limit Unscheduled Time for Participants: Programs should strive to limit unscheduled time for participants and demonstrate a plan for supervision during all program activities and unscheduled time. For older adolescents (those that may drive to events/activities), program documentation should be clear if there is any time period during the operations of the program that the student will not be supervised by program staff (or the participant’s parents). These occasions should thoroughly be assessed for risk, included in any parent liability waivers mandatory in the program documentation, and approved by Risk Management POM Director.

(b) Program Schedule Availability: The program schedule should be made available to parents and older students at the appropriate reading level.

(c) Schedule Adjustments: Any major adjustments made to the schedule should be communicated with the parents in real-time if appropriate, or communicated with the parents upon pick-up. This would include changes in start/end times, format (in person to virtual or vice versa) and location changes for activities. Program planning should be as such that schedule changes are limited as possible.

(d) Transitions: Transitions of minors between scheduled activities, decisions on activity locations, and movement between activities should consider mobility (age and capabilities of children) and supervision requirements.



1.08 Supervision

Personnel should have a clear understanding of their responsibilities regarding supervision of the participating minors. Supervision should be direct and active. In an in person or virtual program, personnel should have a clear understanding of expectations and practice environment scanning for safety, the role of each responsible adult, behavior redirection, activity transition, addressing inattention or participation and a well-defined process to communicate with parents on program expectations.

- (a) Supervision During Program Activities:** While participating in a VU program, and during all hours of stated program events or activities, minors are to be appropriately supervised and the ratio guidelines upheld (see (e) below). Older minor participants are not permitted to be included in ratios or supervise younger minors. Program documentation and notification to parents/guardians must clearly state the schedule and start and end times of program activity and requirements for sign-in /drop off and out/pick up procedures.
- (b) Clear Identification of Program Personnel:** All program personnel should be clearly identifiable by name badges, t-shirts, or other identification that allows others to know of their association with the program. Though this may be easier in a camp activity, faculty or staff overseeing other programs should also be able to be identified with Vanderbilt if he/she is working under a VU program with a minor. This also assists emergency personnel in a crisis situation to know who is the responsible adult.
- (c) Minors 14 years and older (older youth):** If older youth are permitted to travel and arrive to a program without a parent, program documentation must include procedures to follow if the program activity begins and that minor is not present. Programs that permit older (14 and above) minors to sign out at the close of program activity must clearly include language in the participation agreement which acknowledges this permission from the parent/guardian. Minors in middle or elementary school are not permitted to self-sign out of Vanderbilt programs. Exceptions to this provision will be considered on a case by case basis.
- (d) Prohibition of One-on-One Interaction: Research indicates 80% of abuse occurs in 1:1 contact situations.** Program staff should not be permitted to be one-on-one with a student and should employ, at minimum, the principle of “two deep leadership” which includes the presence of a second adult at all times. Activity with minors should be observable and interruptable. If one-on-one engagement is essential to the program, assure the meeting or activity is in a visible public space, in a place containing windows with clear visibility into the room, or in a space where the door can be left open. In these situations, communication with the parents should be clear on the abuse prevention methods the program is implementing to mitigate risk. In the cases of a private lesson or instruction where the only option is one-on-one, contact should be made with the Risk Management office for review and approval. If an emergency occurs which necessitates 1:1 contact, the parent should be informed and the incident documented.
- (e) Ratios:** Programs should follow the American Camping Association (ACA) ratios for day and overnight camps; any exceptions must be approved by Risk and Insurance Management and documented in program materials. Virtual/Remote programs should include, at minimum, a second adult monitoring and to provide technology assistance to limit program disruption.



Age	Day Camp Ratio	Overnight Ratio
5 years and younger	1:6	1:5
6-8 years	1:8	1:6
9-14 years	1:10	1:8
15-18 years	1:12	1:10

1.09 Overnight Programs and Minors

- (a) Overnight programs serving minors are considered high risk due to vulnerabilities in behind closed door activities, dressing/undressing situations, and limits on supervision. Any VU program that conducts overnight operations requires approval and should include at minimum, the following:**
- Prohibition on program staff spending the night one on one with a minor.
 - Prohibition on program adults/participants bathing, showering and changing clothes while the other is present.
 - Smaller program personnel to staff ratios and scheduled curfews and bed checks on minors.
 - Strict curfews and incident response procedures if a minor is not accounted for at curfew or at a bed check.
 - Orientation for students on where/how to locate staff and emergency exit plans.
 - Communication to students on reporting any activity that occurs on an overnight that is in violation of policy or makes him/her uncomfortable.
 - A facility check to include security, locks, and assurance of no access points for non-participants; limits and monitoring of restricted areas in the facility the overnight is being conducted.
 - If the overnight is in a publicly accessible area, procedures that address safety and risk must be in place.
 - Overnight programs must require proof of participant immunizations appropriate to their age (TN schools policy) and pediatric recommendations.

For VU admissions or recruiting activities, signed behavior contract by the host and the guest should be completed. VU enrolled students who host overnight guests that are minors in their VU dorm or residence [should register that guest through the Dean of Students, Office of Housing and Residential Experience and follow the guest policy in the Student Handbook.](#)

- (b)** All VU Overnight programs with minor participants should complete a Risk Assessment including review of procedures, forms, operations, and communications.

1.10 Transportation

- (a)** Program personnel should not be permitted to transport minors in their personal vehicle. If any exception is made, personnel should not be one-on-one with a minor in any vehicle. Vanderbilt students engaging with minors in a student capacity are not permitted to transport minors.
- (b)** Program personnel who perform transportation activities as a part of a VU program or operation with minors must complete approved Driver Safety training and a MVR background check prior to operating a VU owned or leased vehicle on behalf of VU.
- (c)** Any program that includes any transportation of minors should include the transportation activity in the waiver of liability to parents.
- (d)** All drivers and passengers must adhere to state safety and passenger laws and regulations on driver behavior and insurance.



1.11 Facilities and Site Selection

(a) Access and Hazard Assessment

- **Facility Safety Check:** Complete a safety check of the facility you are using, including access and exit points for participants and non-participants. Is your program the only one in the building/on the site? What other programs are operating? Two youth programs side by side may be a benefit or a management challenge. Also check for obstruction of windows, doors or anything that limits visibility into the activity space.
- **Limited Access:** Limit access to program facilities or areas (if possible) to only those who are staffing the program activities.
- **Delineate Spaces/Areas to be Used for Program Activities:** If access cannot be limited, have specific instruction on what space is to be utilized by the program and identify restricted space.

(b) Transition In Between Activities

- Transitions can include time that students are moving from one activity to another within a shared space, or from building to building, or during scheduled breaks in programmatic activities. Plan for age-appropriate supervision during transition times and always maintain line of sight supervision.

(c) Drop Off/Pick Up

- **Consistent Method:** Institute a prescribed method to drop off/pick up that is appropriate for the age group. Most minors in programs should be required to be accompanied to a check in/drop off area by a parent or guardian, and be picked up in the same manner.
- **Minor Driver Procedures:** If a minor is permitted to drive him/herself to or from a program, include the program times in the liability waiver for parents that is clear when the program is to start and end, and the procedure if the minor is absent for the program activity.
- Have clear guidelines for minors who will have access to a vehicle, such as parking and rules on transporting other students in the program.
- Reference Section 1.08 *Supervision* for additional information.
- Contact the RIM Office for permission forms related to self-sign in/out for older youth.

(d) Food Allergies, Meals and Snacks (if included in the program schedule)

- **Diets:** Programs should be cognizant of special diets, allergies, or needs of minors in their programs and plan accordingly.
- **Allergies:** All food and other allergies should be included on the medical release, as well as medication/emergency response treatment process documented for the participant (this includes use of Epi Pen or other rescue medication). Instructions for treatment/response in case of accidental exposure should be documented and kept with the program personnel.
- **Notification of VU Dining Services:** Facilities and dining services should be alerted about any allergies or other special needs of participants if dining on campus, and appropriate notifications of ingredients should be posted/shared with program personnel and the students.
- Incidents regarding any allergic reactions should be reported to parents and in the risk occurrence reporting system.



1.12 Emergencies

(a) Vanderbilt Emergency Preparedness

- All coordinators should provide training and documentation for all program personnel on Vanderbilt's emergency preparedness policies and procedures (<http://emergency.vanderbilt.edu/>).
- Call 911 in a life threatening or safety emergency.

(b) Evacuation and Shelter in Place

- Personnel should be trained on an evacuation plan and shelter in place for all indoor and outdoor facilities.
- The evacuation plan should be reviewed and practiced regularly.
- Utilization of resources from the Office of VUPS Emergency Management is recommended.

(c) Protocol for Contacting Parents/Parent Pick Up Considerations in Emergencies

- Programs should document an emergency pick up plan for parents. This would include any situation which would require early release of participants, or scenarios where there is an active threat and parents might arrive on campus searching for their child.
- Establish an internal plan that includes an off- site or safe site pick up if evacuation of the program facilities is required.
- Establish a communication plan for a situation that would require an evacuation or lock-in type emergency (weather, threat, other), and discuss dismissal procedures. Communicate clearly with parents regarding these procedures.

1.13 Accidents and Injury

(a) Injury of a Participant: Establish a process for responding to and reporting any injury to a participant in the program. Clearly document the nature, cause, treatment administered, and who was notified for any injury.

(b) Reporting Accidental and Other Injury: Program should develop an incident report process to document all accidents and injuries. Parents should also be made aware of any injury to their child in a program, or if their child caused intentional injury to another. All participation agreements should include an Emergency Permission to Treat in the case a parent cannot be reached or the situation is an emergency.

(c) Accidents and injuries of a minor participant should be reported to the Risk Management Office using the risk occurrence reporting system.

1.14 Occurrence and Abuse/Misconduct Reporting to Risk Management

(a) The Office of Risk and Insurance Management maintains and monitors daily the [university occurrence reporting system](#). This system is available to all University users and reports can be made anonymously. Unexpected occurrences can be reported even in the absence of obvious harm. Reportable events can be any of the following:

- Injury or harm (intentional/unintentional) to a minor participant;
- Perceived harm based on red flag behavior or POM Code of Conduct violations or facility or equipment issues;
- Unanticipated risk outcome at an event or activity involving personnel, participant, or neither of these, but occurring at the location of or in the context of program activities;
- Instances of disruptive or unprofessional behavior or conduct of personnel with or without adverse effect;



- Disclosures of abuse by a minor in a VU program.
- (b)** When a serious event or event which needs follow up is reported, the RIM Office will coordinate with the program manager and/or department leadership to notify necessary parties and conduct an assessment of the incident. In the case of an allegation of child abuse, VUPD and/or the Department of Children’s Service will be notified, as per the POM Policy and state mandatory reporting requirements. The program personnel who witnessed or learned about the abuse is usually the best person to report the firsthand information and the POM Director can assist. If program personnel make a DCS report, the internal occurrence report should include the DCS referral number whenever feasible (some states outside Tennessee will not assign a number at the time of the report).
- (c)** A risk manager is available Monday- Friday from 8:00am- 5:00 pm (Protection of Minors Director direct contact is 615-936-5936, protectionofminors@vanderbilt.edu, or the general reception contact at riskandinsurance@vanderbilt.edu or 615-343-6601).

1.15 Adherence to Legal and Regulatory Compliance Requirements

Failure to uphold legal and regulatory compliance can result in both individual and institutional penalties. There are a number of applicable federal compliance requirements that programs serving minors should be familiar with; this includes the following:

- Family Educational Rights and Privacy Act (FERPA) (Managed by the Vanderbilt Registrar)
 - Generally FERPA only applies to minors participating in programs for university academic credit or as part of a credit bearing high school course or internship.
- Title IX– this includes abuse/allegations of abuse to minors in programs
- Child Online Privacy Protection Act (COPPA) – in relation to minors’ privacy and access online
- Clery Act (managed by VUPD) – campus crime reporting
- HIPAA - regarding medical records, notification, and patient care

Additionally, failure to report child abuse and/or adhere to regulatory obligations under state and federal statutes and institutional policy can result in institutional regulatory fines and accreditation issues, insurance coverage exclusion, as well as personal accountability by disciplinary action, up to and including termination and/or expulsion by the institution and under the law.

1.16 Privacy, Data Collection, Records and Document Storage and Retention

Programs should consult with the Office of the General Counsel for guidance on storage, retention, and destruction of documentation for programs serving minors. Various policies may apply depending on the data that is collected at the onset of the program. It is not recommended that documents be discarded until at minimum ten years past the participant’s age of majority (typically, 18), though some programs will be advised to maintain records past that time. Electronic forms and storage of records is permitted.

1.17 Closing the Program Event

At the close of the event or program, it is recommended a summary meeting be held with all personnel to address any incidents or events that occurred that impacted the safety of minors. Any adverse or risk related situations should be discussed and addressed for future planning.

The closing meeting should address check in/out procedures, transitions, activities, identified risks, mitigated risks, rules and policies in the program, safety in the program, and suggestions for improvement.



Section II. Policy Compliance and Risk Management

2.01 Registration and Approval of the Program with the Office of Risk and Insurance Management

(a) Program Registration With the Office of Risk and Insurance, Protection of Minors Is Required When:

1. A minor is participating in a Vanderbilt program, event, activity, research, or care setting and there is an expectation that VU personnel (including staff, faculty, students, and/or volunteers) will provide supervision for that child (or children). Supervision by Vanderbilt is expected if there is no parent and/or third party chaperone present during the activity. This includes virtual, remote programs when the parent or a third party is not actively participating in the activity and providing supervision.

OR

2. If a third party group is bringing minors to campus or hosting an online event for minors to participate in a Vanderbilt hosted program, and the third party will remain on site or online and provide supervision throughout the event, and the activity is not a public event. The third party should be provided a Protection of Minors Third Party Compliance Agreement for signature. Participation agreements (see Section III) may be required depending on the activity.

OR

3. If a third party is using facilities and space on the Vanderbilt campus to provide a program for minors, the program and activity must be registered with the Office of Risk and Insurance Management. As part of a space or facility rental agreement, which includes required evidence of insurance, the third party will be required to complete the Third Party Compliance Agreement or other such similar attestation.

(b) How to Register a Program: The [Protection of Minors Web Application](#) is the online management tool used by the university to maintain a central registry of programs for minors and subsequent event and personnel information. When a new program is created, the Application alerts the POM Administrator for a review prior to approval.

Program Approval Status Categories relative to personnel compliance:

- Approved: All personnel added to events are required to have a background clearance in the past four years, and POM training in the last year.
- Approved Third Party: All personnel added to events are required to have completed POM training in the past year.
- Approved Public Event: Public events (no event registration to attend, such as an athletics event) do not require personnel to have completed training, though it is recommended. Consistent with the POM policy, if the event is “geared toward minors,” such as an Easter egg hunt, a read-a-thon, a visit with Santa, compliances may be required.
- Pending/Denied: Program is under review or not approved due to risk or compliance concerns.

Note: in addition to personnel compliance, the event may require participation agreements and/or a compliance agreement to be completed by a third party host.

(c) After program approval and event entry, the POM Web Application will show the background clearance and training compliance status of event personnel to permissioned users. New programs will be provided a Risk



Checklist to complete and a User Guide to the Web Application will be provided for any newly registered program.

(d) Exceptions to Program Registration:

- **VU enrolled students who are minors (under 18 years of age at the time of enrollment) are not considered minors subject to program-related requirements of the POM Policy.** Statutory reporting and internal reporting requirements for POM do apply to minor students. Interactions of an academic, housing, recreational, service, or social nature through VU programs where minor enrolled undergraduates participate will not require registration. VU enrolled students who are minors are entitled to the same protections as enrolled adult students. Minor students may be required to complete POM training as a part of an academic course or service project which interacts with minors.
- **Non-Vanderbilt Programs off campus:** If Vanderbilt personnel are participating in a non-VU third party hosted or operated event or program with minors, and they are not representing Vanderbilt or doing so on behalf of the University, the program does NOT require registration. If there is a question regarding whether the program you are participating in is a VU program, ask the coordinator or contact protectionofminors@vanderbilt.edu.
- **VU Public Events** that minors attend with their parents/guardian/outside chaperone typically will NOT require registration, but coordinators may contact Risk and Insurance Management for operational assessments and recommendations.
- **Collegiate events when VU hosts other higher educational institutions and some participating enrolled students may be under 18** are not required to be registered, however organizers should be aware of statutory implications of incidents involving participating minors. Tennessee law does not auto-emancipate minors who are enrolled in an institution of higher education.

2.02 Personnel Compliance and Department Responsibilities

It is the responsibility of the program manager or coordinator to assure the policy compliance requirements are met prior to permitting an individual to engage with minors. Additionally, it is the program manager's responsibility to manage the compliance intervals of all personnel to avoid non-compliance. The program monitoring process includes a review of personnel compliance.

(a) Criminal Background Clearance Process and Frequency

- Unless noted in the exceptions to background clearance below in this section, criminal background check clearance is required for all personnel who interact with minors in Vanderbilt programs; this includes staff, faculty, students, and volunteers.
- HR Background clearance is a requirement of all new faculty and staff employees to Vanderbilt.
- **Personnel actively working with minors must have a background check completed at least every (4) four years. The four year recheck is coordinated by the RIM/POM office and HR.** Those whose clearance is nearing expiration and are on a personnel roster of an active event in a POM Program will be sent a notice of impending non-compliance. Within two months of expiration, the person will receive an email from the university clearance vendor to complete a new clearance. Program managers and individuals working with minors are responsible to manage compliance for events. Program monitoring includes compliance checks for personnel and non-compliance will be reviewed with department leaders.
- The background check for employees (staff, faculty, post-docs, etc), VU volunteers, contractors (where required) should be performed upon hire. If the clearance is not reflected in the POM Web Application when the event is entered, email PEBC@vanderbilt.edu, and include the name, VUNET ID, Employee ID (if known), email and POM Program and Event name of the person to be checked. If there is not a clearance on file, the individual will be



sent instructions via an email link and should respond promptly. The requestor will be notified when the clearance is complete and the clearance will be reflected in the POM Web Application.

- Criminal background clearances must include checks of the National, State, and Local criminal records databases, and the Sexual Offender Registry. Any results indicating findings of violence, abuse, and exploitation will be reviewed.
- If there are any findings as a result of the background check analysis, a small, specialized review committee will verify the record and details of the offense(s).
- All records that indicate findings will be reviewed. A finding does not automatically exclude participation.
- Background clearance date will be used to determine compliance at the four year interval. If the background review committee is considering a clearance, but would not approve the person to meet standards for work with minors or there are certain type-identified offenses in the record and the review committee is considering moving forward, prior to final decision-making, a representative of the committee will contact and consult with the Protection of Minors Director or the Senior Director in the Office of Risk and Insurance Management. The committee and the Protection of Minors Director will carefully consider the youth protection elements, including the known and possible interactions of the individual with and access to minors in University programs and settings.
- Individuals who are arrested while actively associated as working in a VU program with minors must disclose the arrest to the program supervisor/coordinator immediately. VU Staff/Faculty are required to report any criminal proceedings on the Conflict of Interest Disclosure.
- Some programs may require a fingerprint background check in accordance with state law, contract, or licensing. Verify what type of clearance is required for your program. The Office of Human Resources completes fingerprinting clearance if required for employees.
- The most recent acceptable clearance date on file with POM for the person will be reflected in the POM Application. Current personnel clearance data is an asset in the POM Web App. Once a program has been approved, the permissioned roles allow addition of an event and VUNETID-holding person's current compliance.

The following departments' and schools' affirmative clearance dates of VU students are acceptable to the university for the purposes of compliance with the POM Policy. Clearance must be documented in the registered event in the personnel roster, notes or sent to be entered into the POM dataset.

- Office of the Dean of Students
- Peabody College of Education
- Vanderbilt School of Medicine
- Vanderbilt School of Nursing
- Vanderbilt Divinity School

Background clearance exceptions and clarifications:

1. Current Vanderbilt students who host overnight prospective high school students in formal admissions/athletics office programs will complete training, a behavior contract, and the guest will be registered with OHARE; the student-host will not be required to complete a background clearance.
2. Faculty, staff, and students currently working in a research lab where a minor is present as part of a program or activity unaffiliated with their research and where there is no likelihood of interaction beyond shared space.
3. Current Vanderbilt students hosting prospective campus visits for minors in a 1:1 or group setting will complete training but not be required to complete background clearance.



4. Vanderbilt departmental personnel hosting a third party group and the third party group will remain supervised by parents/chaperones through the duration of the visit. A third party compliance agreement will be completed and the event will be registered.
5. One time uncontracted guest speakers or presenters in a registered program (Speaker must be accompanied by compliant program adult through the duration of the activity). Contracted guest speakers should have the background clearance attestation as part of the speaker agreement (see Section II (2.03)).
6. Visiting college interns working with minors in a VU program: formal affiliation agreements should include attestation that the home institution completed a background clearance. Interns without affiliation agreements who interact with minors as part of the placement should complete a VU background clearance. Departments have the discretion to require a higher level of compliance than the non-VU attestation of clearance.

(b) Training

- All personnel interacting in Vanderbilt programs involving minors are required to complete child abuse reporting and prevention [training](#). This training should include but is not limited to the following:
 - Vanderbilt University's policies regarding interactions with minors and the VU POM Code of Conduct
 - Behavioral signs that minor victims may exhibit
 - Sexual abuse and sexual harassment
 - Inappropriate behavior with Minors
 - Reporting requirements and procedures.
- **Training is an annual requirement for personnel working with minors.** This includes staff, faculty, students, contractors working in VU programs, volunteers, and other groups.
- Members of registered student groups hosting or volunteering with minors in conjunction with a third party will be required to complete training.
- All VUNET holders with access to Oracle Learning complete ***Protection of Minors 101*** for initial training and policy agreement compliance.
- "***Protection of Minors Annual Renewal***" training is the subsequent compliance module to meet annual compliance and is released on July 1 each year. POM Annual Renewal's pre-requisite is the POM 101 module.
- If personnel are third party non-employees without Oracle Learning access, contact protectionofminors@vanderbilt.edu for alternate training options.
- Additional approved training may be offered in a group setting or be approved on a case by case basis by the Protection of Minors Director in the Office of Risk and Insurance Management.
- To request approval for alternate training to meet this requirement, email protectionofminors@vanderbilt.edu.

(c) Policy compliance attestation

- Protection of Minors Policy agreement is built into the online training module provided by Oracle Learning or EverFi (*Protecting Youth* – for incoming VU students).
- **Policy agreement is an annual requirement.**



2.03 Compliance Requirements for Program-Invited Guests/Visitors

- (a) If a program plans to utilize one-time guest speakers and/or presenters during the course of the registered event the following steps should be taken:
- If the guest is under a contract for the one-time event, the contracted party must complete all Procurement contracting requirements which includes attestation to having a criminal background clearance **and** a compliant adult must remain with the minors during the event in which the guest participates.
 - If it is an uncontracted one-time engagement for a short duration (generally less than two hours), a compliant adult in the program shall remain with the minors for the duration of the activity in which the guest is engaged.
 - If the guest/visitor will, at any time, be with the minor participants without a supervising compliant adult, the guest will require a background clearance check, training, and be added to the event in the POM Application.
 - Adults with more frequent interaction with a program will not be considered “guests” and will require full compliance.
 - Contact the Office of Risk Management if your situation is not described in the scenarios above or if you have a question.

2.04 Risk Assessment

- (a) The Office of Risk Management has created a Risk Checklist to assist Program Directors in evaluation of operations. All new programs will complete the Checklist prior to Approval.
- (b) Program Directors are encouraged to review the [Risk Assessment Matrix](#) document (Appendix A) for Programs and Operations serving minors and complete a self-evaluation. Any high/extreme risk identified in this assessment should be discussed with the Protection of Minors Director or a Risk Manager.

Section III. Youth Program Descriptions, Participant Registration, and Content of Participation Agreements

3.01 Program Descriptions

Each program should have a complete program description available to parents which includes the objectives, expectations, hours, locations and physical requirements of the program.

Programs operating with use of remote or virtual engagement: Online platforms should review and adhere to the material in Appendix C: Remote Engagement in Youth Programs. Remote programming should adhere to VUIT secure practices for VU enterprise systems.

3.02 Youth Program Registration Systems and Collection of Participant Information

VU has a variety of system options to facilitate youth program participant registration and document management. Leaders are advised to contact the procurement office for approved vendors or may reach out to the Risk and Insurance Management Office, Protection of Minors for possible options. Programs should be aware of the responsibility of maintaining secure data and any health or personally identifiable information (PII).



3.03 Equal Opportunity and Affirmative Action Statement

The program registration process should include the following or similar language approved by the Office of Equal Opportunity and Access (EOA):

Vanderbilt is committed to the principles of equal opportunity and affirmative action. The University provides reasonable accommodations are made on a case by case basis for qualified persons with disabilities. Such requests should be made or as soon as possible. Please tell us if your child requires a reasonable accommodation to apply for the Program or to perform the Program tasks. Reasonable accommodations are often possible for children with disabilities who wish to participate, so long as the accommodations do not fundamentally alter the nature of the Program, cause undue hardship or otherwise cause a direct threat to the health or safety of others.

3.04 Content of Participation Agreements

(a) All programs that register or enroll minor participants must have parents/guardians complete a university Participation Agreement. The Office of the General Counsel at Vanderbilt can assist in drafting specific language tailored to your program. Sample forms are available by emailing protectionofminors@vanderbilt.edu. At minimum, the agreement should include the following:

- Liability and waiver to hold Vanderbilt and its affiliates harmless.
- Assumption of Risk
- Medical release and permission to treat in the case of an emergency.
- Photo/Media release – permission to use image of child for Vanderbilt use.
- Affirmation of sound medical health, and explanations otherwise (where applicable).
- Listing of allergy conditions directly related to the program activities (where applicable).
- Statement on dispensing medication if participant requires prescribed or OTC medicine (where applicable).

(b) Protection of Minors Reporting Provisions to be included [in University Participation Agreements](#)

- University Participation Agreements (and other appropriate document, such as a handbook or program information page) for programs serving minors should include information for parents on Vanderbilt personnel’s requirement to report suspicion of abuse.
- Documentation for programs serving minors should include information for parents on how an individual can report concerns regarding abuse of a minor in a Vanderbilt program.
- The following language (3.05) is recommended and has been approved by the Office of the General Counsel:

3.05 Vanderbilt Protection of Minors Provision

Vanderbilt University personnel adhere to Tennessee state law on mandatory child abuse reporting to either the appropriate law enforcement agency or the state hotline operated by the Department of Children’s Service. In addition to external reporting, Vanderbilt has a mandatory internal child abuse and misconduct reporting procedure. If you have reason to believe abuse or inappropriate behavior has occurred concerning a minor participating in a Vanderbilt University program, please consult the program director, or Risk and Insurance Management (615-936-5935), or report via the Vanderbilt hotline at 844-814-5935. The Tennessee Child Abuse reporting hotline number is 877-237-0004.

Programs should supply and/or post this reporting information to parents/guardians on websites and in program material.



Section IV. Third Party Activities, Contracts, and Events on Campus

4.01 Registration with Risk and Insurance Management

Third party organizations conducting programs involving minors at Vanderbilt must have a VU host and be registered with the Office of Risk and Insurance Management through the Protection of Minors Web Application. This compliance, including contracts and agreements, will be managed by the VU Office/Department hosting the event.

4.02 Contracts with Third Party Groups – Insurance and Indemnity

All Contracts related to working with minors or hosting events for minors in VU facilities or spaces should include the appropriate amounts of required liability insurance which includes sexual abuse and molestation (SAM) as a covered or separate policy. This includes contractors working directly with minors on behalf of VU and third party event/facility contracts. Consult with the Risk and Insurance Management Office for more information on appropriate amounts of insurance or to request a waiver. This may also include agreement language which:

- Names Vanderbilt as additional insured
- Indemnifies Vanderbilt University
- Requires verification of sexual abuse molestation (SAM) coverage as a separate policy or included in the terms of General Liability.
- Includes requirements related to hosting minors on campus, such as including the Third Party Compliance Agreement as a supplemental form.

4.03 Participation Agreements and Waiver Forms for Third Party Contracts

- (a) Third party organizations hosting events with minors on Vanderbilt property or in programs serving minors should be contracted, insured and complete the Third Party Compliance Agreement or other such document achieving the same objective in child abuse prevention and reporting notice, compliance of personnel and supervision throughout activities.
- (b) **Third Party Protection of Minors Compliance Agreement:** Third Party programs bringing minors to campus locations that are neither affiliated with, nor operated by Vanderbilt entities are required to demonstrate evidence through attestation that personnel have cleared a background check, received training on Child Abuse, and must be provided with a copy of the POM Policy and ratio requirements. This Agreement is a component of the facility reservation and Procurement processes.

4.04 Protection of Minors Compliance of Third Party Personnel

- (a) Third party groups applying for or reserving VU facilities and space must agree to the following:
 1. All personnel in the program have completed a cleared criminal background check in the prior 4 years which included national, state and local criminal records checks, the sexual offender database and resulted in no adverse findings of violence, abuse or exploitation. In addition, verification of the vendor, practices of clearance, and clearance dates may be requested on a case by case basis and are subject to compliance audit.
 2. All personnel have received training on prevention, identification, and reporting of abuse.



3. All personnel have been provided access to the Vanderbilt POM Policy, have received a copy of the POM Code of Conduct and Reporting Procedures, and agree to abide by the policy including all mandatory reporting procedures and the VU POM Codes of Conduct for interacting with minors.
 4. The organization will provide appropriate supervision to the participating minors of the event, including the minimum adult to minor ratios and adoption of VU's POM Code of Conduct when interacting with minors.
 5. The organization will comply with any curfew requirements and emergency or incident response requirements.
 6. The organization will report incidents of abuse, sexual assault, sexual harassment, stalking, bullying, and violence to the VU host agency and/or the Vanderbilt University Police Department.
 7. Any exceptions to the four year re-clearance or training requirement should be approved by the Protection of Minors Director.
- (b) If there is no contract in place for the third party, contact Risk and Insurance Management for a copy of the "Protection of Minors Compliance Agreement for Third Party Groups".
- (c) Compliance by third parties must be achieved prior to the start of any activity on campus.
- (d) Failure to comply or falsifying information in the compliance or contract agreement may result in cancellation of the event and/or future reservation denial.

Section V. Public Events not Geared to Minors

5.01 Registration with Risk and Insurance Management Not Required

Vanderbilt sponsored public events (such as athletic events, hosted shows, speakers, etc.) that are open to the public, not geared to minors, and where there is no expectation of supervision of minors by Vanderbilt personnel, will not require registration with Risk and Insurance Management. If the program is geared toward minors, such as a read-a-thon, carnival, etc., compliance requirements will be determined on a case-by-case basis.

5.02 Risk Mitigation at Public Events When Minors are Present

- Include marketing that reminds parents to "keep an eye" on children.
- Notify VUPD of the event and coordinate accordingly if security or other enforcement services are needed.
- Include a safety plan or process for a lost or missing child.
- If injury to a minor occurs, have a first aid location or plan to assist.
- Complete an event "pre-scan;" walk through the area/facilities to see if vulnerabilities or risks to minors may be present.
- Report any accident, injury, or unexpected occurrence to [the Risk and Insurance Office](#).
- Complete a post-event discussion on any incidents with minors that may require program/event changes.
- Contact Risk and Insurance Management for assessment assistance.



Section VI. Other Activities Involving Minors

6.01 Admissions Visits

- (a) Operational admissions and recruiting personnel (VU staff and faculty) for VU will have full compliance with the POM Policy.
- (b) Student hosts of minor visiting students as part of an organized visit such as MOSAIC, Ingram Scholars, and Athletics Recruiting (and others) will have completed appropriate training as a part of their host responsibilities and have awareness of reporting procedures prior to hosting high school admitted and prospective visitors and groups (see 2.02(b)). All unexpected occurrences should be reported to Risk and Insurance Management.
- (c) The coordinator of the organized admissions visit will collect emergency contact and permission to treat information from the parent/guardian of the minor visitor if not accompanied by parents/guardian.
- (d) If the visit includes overnight accommodations for minors in any VU residential housing, the coordinator of the organized admissions or recruiting visit will communicate with the Office of Housing and Residential Experience of the dates of the visit, guest and host names and locations of overnight stays.

6.02 Overnight stays of individual minor guests of VU students in VU Residence Halls

- (a) The Guest Registration process through OHARE should be used for all overnight stays of minors in VU housing; this includes prospective non-admitted or non-enrolled students and student athletes.
- (b) Guests under the age of 16 are not permitted overnight visits in student residence areas. Exceptions for student siblings can be requested through the Senior Director of the Office of Housing and Residential Experience.
- (c) Complete the Guest Registration form on Anchor Link. The registration will not be approved until the parental/legal guardian consent is obtained.

6.03 Volunteers under 18 years of age (non-Intern or Observer)

- (a) Programs considering use of volunteers under age 18 should consult with the POM Director and the Office of Human Resources.
- (b) Minor volunteers must be supervised by Vanderbilt personnel (not participating adult volunteers).
- (c) In very limited cases, minor volunteers will be permitted to assist adult program personnel in conducting POM registered program activities. In these cases, minors must be supervised by a program adult.

6.04 Registered Student Organizations – Anchor Link

- (a) Members of Registered Student Organizations who conduct or participate in activities and events with minors will complete either Protection of Minors training (level 1) or training and criminal background clearances (level 2), depending on type of service and the presence of third party supervision.



- (b) Student leaders and members on the organization roster will be notified of their compliance requirements and should promptly complete.
- (c) Student Organization rosters and events should be managed and updated through Anchor Link.
- (d) The Office of the Dean of Students Student Organizations division has a process in place to offer support in planning activities with youth and to monitor compliance of student groups.
- (e) Student organizations are not permitted to transport minors in personal or leased/rented vehicles.

Section VII. Additional Resources for Program Leaders

Additional resources for program leaders include the following;

- [Risk Assessment Matrix for Programs and Operations](#)
- Risk Checklist for Programs
- Remote Engagement in Youth Programming
- Roles and Responsibilities for Vanderbilt Schools and Departments



Vanderbilt University Risk Assessment for Programs and Operations Serving Minors

Risk Threat/Hazard Examples

- Injury**
 - Falls
 - Use or Proximity of Objects that could injure
 - Sports activities
 - Water Activities
- Transportation**
 - Drop/Off/Pick Up
 - Group Travel
 - Night or road hazards
 - Field Trip/Off Site/International Travel
- Medical**
 - Pre-Existing Conditions
 - Allergy
 - Unknown Conditions
 - Medication Administration
 - Suicidal/At Risk
 - Drug/Alcohol Use
 - Mental Illness
- Custody/Parent**
 - Custody Dispute
 - Restraining or Protective Orders
 - Access
 - Violence/Substance Abuse
- Sexual Molestation**
 - Undetected Offender
 - Opportunity for Grooming
 - Selection/Screening Lacking
 - Unclear Reporting of Red Flag Behavior
 - Non-Verbal Minors
- Supervision**
 - Transition between activities
 - Transition between buildings
 - Unsupervised time
 - Overnight
 - High Ratios
 - Teens and Sexual Activity or Assault
- Premise**
 - Accessible to Outside
 - Access by non-program participants or personnel
 - Structural risks/exposure
 - One-to-one behind closed doors
 - Locker Room or Changing Facilities

Program Name or Operation:

Using the risk threat examples at the left, list specific risks inherent in your program. Using the rank indicators, determine the following:
Seriousness/Impact of the risk: 4= May Result in Death or Severe Harm, Catastrophic, 3=Critical, 2= Medium/Marginal Impact, 1= Minimal Threat/negligible impact to safety and well-being and the **Likelihood** (probability) of it occurring: A= Almost certain to occur immediately or expected to occur frequently, B= has occurred Before and is possible, C= Could occur but unlikely, D= Doubtful or Unlikely to occur at any point during the activities.

4A= Highest Risk in Seriousness and Likelihood= EXTREME RISK

1D= Lowest Risk in Seriousness and Likelihood= LOWEST RISK

Program Risks Identified (15)		Seriousness/Impact of Risk			
		1	2	3	4
Likelihood to happen	Almost Certain	Low	Medium	High	Extreme
	Happened Before/Possible	Low	Medium	Medium	High
	Could But Unlikely	Low	Low	Medium	High
	Doubtful/Rare	Low	Low	Medium	Medium



Risk Response: Green/Low – Monitor and Manage; Yellow/Medium – Control and Mitigate; Red/High- Immediately Address and Lower Risk level with Strict Controls Prior to Proceeding; Dark Red/Extreme– Unacceptable Risk Do Not Proceed
Contact Risk Management for Assistance or to Discuss Mitigation and Any High/Extreme