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## Policy Information

**Effective Date:**

February 23, 2015

**Policy Number:**

SA-100

**Reference:**

Classified Staff Human Resources Policy Manual 224.0

University Handbook for Appointed Personnel 2.26

Student Employment Manual 115.0

**Responsible Unit:**

Student Affairs and Enrollment Management

**Phone:**

(520) 621-3772

## Purpose and Summary

### I. Purpose, Philosophy, and Applicability

The University of Arizona (“University”) is committed to promoting the safety and well-being of individuals who visit or use its campus or other facilities for any reason. The purpose of this Policy is to establish reasonable and flexible safeguards for official University programs or activities open for participation by minors.

## Scope

This Policy applies to organized University programs and activities (“Programs”) that are supervised exclusively by University employees or others authorized to act in a custodial capacity on the University’s behalf (“Authorized Representatives”) for the benefit of individuals under the age of 18 (“Minors”).

While the University will use all reasonable means to safeguard all minors, this Policy does not apply to minors who (a) have been admitted and matriculated as students at the University; (b) are employed by or volunteering at the University; (c) attend or participate in University activities while supervised by a parent, legal guardian, or official of a school or other non-University organization or

group; (d) attend University events open to the public (e.g., museum tours, football games, etc.) for which a parent or legal guardian may give permission; or (e) participate in activities that have been given Institutional Review Board approval. This Policy also does not apply to health-care provider/patient or lawyer/client relationships.

## **Policy**

### **II. Policy**

#### **A. Supervision of Minors**

Authorized Representatives will avoid one-on-one interactions with Minors that cannot be observed by another Authorized Representative. There may be situations, however, in which such interactions are necessary. Examples may include off-site auditions, interviews, mentoring, and tutoring sessions. Where one-on-one interactions are planned or can reasonably be anticipated in advance, the Program must obtain written administrative and parental or legal guardian approval using an "Administrative Approval of One-on-One Interaction with a Minor" ([Appendix A \[1\]](#)) and a "Parental/Legal Guardian Disclosure of One-on-One Interaction with a Minor" form ([Appendix B \[2\]](#)), or customized Program forms containing, at a minimum, all of the information required in Appendices A and B.

#### **B. Duty to Report**

1. If an Authorized Representative reasonably believes that a Minor, while participating in a Program, has been subjected to abuse or neglect, he or she will immediately report such information to a peace officer (by calling 9-1-1) and to the Program supervisor. Any Authorized Representative who is aware of an ongoing threat to the health or safety of a Minor will take such steps as are appropriate under the circumstances to immediately separate the Minor from the threat.
2. The Program will immediately take steps to prohibit anyone whose conduct has resulted in a report under this section from having any further contact with Minors until it receives suitable assurances that the individual whose conduct resulted in the report has been absolved of any wrongdoing.

#### **C. Images of Minors**

Authorized Representatives may photograph, videotape, or digitally record a Minor *only* (a) for programmatic purposes, and (b) with the express written authorization of the Minor's parent or legal guardian using an "Image Release" form ([Appendix C \[3\]](#)) or a comparable Program-specific form providing for such consent.

#### **D. Communications with Minors**

While a Program is being conducted, Authorized Representatives may communicate with Minors by phone, social media, or other electronic means (e.g., e-mails, text messages) only to convey programmatic information, and may not have contact with Minors outside of official programmatic activities.

#### **E. Medical Contacts with Minors**

1. Depending upon a review of factors such as Program duration, location, and activities, Programs will, if appropriate, develop individualized protocols regarding medical contacts with

Minors. Such protocols may include medical information to be collected about Minors, administration of medication to Minors, and use by Minors of health-care-provider-prescribed medical devices to treat emergency or chronic conditions (e.g., “Epi” pens and respiratory-related inhalers).

2. At least one Authorized Representative with current first-aid and CPR certifications shall be reasonably accessible during all Program activities. Program staff will call 9-1-1 in the case of a medical emergency involving a Minor.

## **F. Training**

The University will develop and maintain a training program for Authorized Representatives that includes information about responsibilities to safeguard Minors, applicable policies and procedures, and reporting requirements. Authorized Representatives will complete the training as directed by the University. The University will maintain a list of Authorized Representatives who have completed the training.

## **G. Criminal Background Checks**

As may be required by University policies and procedures, the Division of Human Resources (“HR”) will conduct or cause to be conducted a criminal background check of all individuals who wish to serve as Authorized Representatives.

## **H. Behavioral Expectations**

Before a Program begins, it will distribute written behavioral expectations to all Minors and their parents or legal guardians using the attached "Behavioral Expectations for Minors" form ([Appendix D](#) [4]) or a comparable Program-specific form. Minors and their parent(s) or legal guardian(s) will sign and return the form to Program staff to acknowledge that they agree to its terms. Authorized Representatives will sign and return a "Behavioral Expectations for Authorized Representatives" form ([Appendix E](#) [5]) or a customized Program form containing, at a minimum, all of the information contained in Appendix E, to acknowledge that they have reviewed this Policy and agree to abide by its terms and conditions.

# **III. Compliance**

## **A. Recordkeeping**

1. Programs will obtain contact information, including name, phone numbers, and street and e-mail addresses (if available), for the parents or legal guardians of all Minors on a "Program Participant Information Form" ([Appendix F](#) [6]) or a comparable Program-specific form. This information will be used to notify such individuals of any (a) significant health or safety issues affecting the Minor, including medical or behavioral problems; and (b) programmatic disruptions, including cancellations and time changes.
2. Programs will also obtain contact information for individuals (other than a parent or legal guardian) authorized to pick up the Program Participant, if applicable, and for one or more adults designated as emergency contacts. Programs will provide contact information for at least one Authorized Representative to the parents or legal guardians of each Minor.
3. As soon as such information becomes available, Programs will submit a "Program Information Form" ([Appendix G](#) [7]) to the Senior Vice President for Student Affairs and Enrollment Management (“Senior Vice President”) containing a description of activities and their dates and locations. Programs will supplement this information with the names of all participating Minors and Authorized Representatives as soon as such information becomes final. The Senior

Vice President will maintain a master list of all programmatic information reported.

## **B. Consequences of Violations**

1. Employees and others who violate this Policy may be subject to discipline, including but not limited to, dismissal or suspension from employment, dismissal from participation in current programs, or ineligibility to participate in future programs.
2. Units that violate this Policy may be prohibited from offering, sponsoring, hosting, or otherwise operating programs or activities for Minors.

C. The University's **Internal Audit Department** shall, from time to time and pursuant to its policies and procedures, audit the compliance of Programs with this Policy and the effectiveness of this Policy.

[Appendix A: Administrative Approval of One-on-One Interaction with a Minor](#) [1]

[Appendix B: Parental/Legal Guardian Disclosure of One-on-One Interaction with a Minor](#) [2]

[Appendix C: Image Release](#) [3]

[Appendix D: Behavioral Expectations for Minors](#) [4]

[Appendix E: Behavioral Expectations for Authorized Adults](#) [5]

[Appendix F: Program Participant Information Form](#) [6]

[Appendix G: Program Information Form](#) [7]

## **Related Information\***

[Office of Youth Safety](#) [8]

[Arizona Board of Regents Policy 6-709: Mandatory Background Checks for Employees and Process for Hiring, Retaining, or Terminating Employees Convicted of a Felony Offense](#) [9]

[Background Checks](#) [10]

[Pre-Employment Screening Policy](#) [11]

[Workplace Violence Policy](#) [12]

[University of Arizona Nondiscrimination and Anti-harassment Policy](#) [13]

[Visitors in the Workplace Policy](#) [14]

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### **Links**

[1] <https://policy.arizona.edu/sites/default/files/uploads/minors-APPENDIX-A.docx>

[2] <https://policy.arizona.edu/sites/default/files/uploads/minors-APPENDIX-B.docx>

[3] <https://policy.arizona.edu/sites/default/files/uploads/minors-APPENDIX-C.docx>

[4] <https://policy.arizona.edu/sites/default/files/uploads/minors-APPENDIX-D.docx>

- [5] <https://policy.arizona.edu/sites/default/files/uploads/minors-APPENDIX-E.docx>
- [6] <https://policy.arizona.edu/sites/default/files/uploads/minors-APPENDIX-F.docx>
- [7] [https://policy.arizona.edu/sites/default/files/uploads/minors-APPENDIX-G\\_0.docx](https://policy.arizona.edu/sites/default/files/uploads/minors-APPENDIX-G_0.docx)
- [8] <https://youthsafety.arizona.edu/>
- [9] <https://public.azregents.edu/Policy%20Manual/6-709-Mandatory%20Background%20Checks-Employees-Process%20for%20Hiring-Retaining-Termination%20Employees%20Convicted-Felony%20Offense.pdf>
- [10] <http://hr.arizona.edu/managers-supervisors/recruitment-hiring/background-checks>
- [11] <http://policy.arizona.edu/human-resources/pre-employment-screening-policy>
- [12] <http://policy.arizona.edu/human-resources/workplace-violence>
- [13] <http://policy.arizona.edu/human-resources/nondiscrimination-and-anti-harassment-policy>
- [14] <http://policy.arizona.edu/facilities-and-safety/visitors-workplace>