HRM-050

# Protection of Minors and Reporting Abuse

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**Policy Type** University

**Contact Office** Youth Protection (Office of)

**Oversight Executive**
Associate Vice President for Safety & Security and Chief of Police

**Applies To** Academic Division and the Medical Center.

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**Reason for Policy**

The University is committed to promoting a safe and secure environment for minors participating in University-sponsored activities and programs on University property and in University facilities or under the authority of the University at other locations, including the virtual environment. To safeguard these individuals and provide for their well-being and comply with applicable laws, the University has established minimum requirements for those who work with or interact with individuals under the age of 18.

Programs and activities for minors provide benefits for the University such as:

- May attract youth to the University, many of whom will be highly qualified for future admission.
- Support the UVA strategic plan and outreach efforts, particularly those aimed at youth.
- Promote involvement of faculty, staff, and students who can grow professionally as they build programs/activities and teach youth.
- Enhance the reputation of UVA through effective programming.

**Definition of Terms**

### Associated Individuals

**Description**

(1) Students who are registered or enrolled for credit-bearing coursework and (2) University employees, consisting of all full-time and part-time faculty, University staff, Medical Center employees, classified staff, wage employees (including temps), professional research staff, and post-doctoral fellows.

### Child Abuse and Neglect

**Description**

Physical abuse, physical neglect, medical neglect, sexual abuse, or emotional/mental maltreatment of a child.

### Covered Program

**Description**

An organized program involving direct contact with minors that is conducted by a University academic or administrative unit and takes place on or off University property. It also includes an organized program involving direct contact with minors conducted by a third party that takes place on University property.

### Covered Program Staff

**Description**

All individuals who work with or otherwise come into direct contact with minors in a covered program. This includes members of the University (faculty, staff, Medical Center employees, and students), volunteers, and all individuals employed by, contracted by, or volunteering for a third party for a covered program.

## Direct Contact

**Description** Care, guidance, control, or supervision of minors in one-to-one or group settings.

## Grooming

**Description**

The testing and manipulation of physical, psychological, and behavioral boundaries over time to lay the groundwork that may lead to abuse. Grooming may include certain types of behavior, including:

- Attempting to be alone with children, including communicating with minors through email, text messages, social networking websites, internet chat rooms, or other forms of social media at any time except when there is an educational or programmatic purpose and the content of the communication is consistent with the mission of the program/activity and the University
- Spending an inappropriate amount of time with children that goes beyond norms
- Discouraging a child's interactions with other adults
- Demanding secrecy
- Giving frequent gifts
- Not respecting physical or emotional boundaries
- Talking with children about personal problems or relationships and inviting them into solving them

## Minor Internship

**Description**

A form of experiential learning that integrates knowledge and theory learned in the classroom with practical application and skills development in a professional setting for non-matriculated, non-enrolled minors. Internships give minor students in secondary school (who are not matriculated and not enrolled at the University) the opportunity to gain valuable applied experience and make connections in professional fields they are considering for career paths and give employers the opportunity to guide and evaluate talent.

## Minor (child)

**Description** An individual under the age of 18.

## Organized Program

**Description**

An academic, athletic, or recreational activity offered to minor participants. This includes but is not limited to summer camps, sports camps, academic camps, theater camps, music camps, workshops, conferences, competitions, group experiential learning opportunities, and other enrichment programs. Organized programs can be residential or non-residential.

## Permission-Granting Unit

**Description**

An academic or administrative unit that is responsible for the coordination of space usage and/or for conducting the covered program activity.

## Student(s)

**Description**

An individual who either has been admitted to a degree or certificate program at the University or has received permission to enroll and is registered for coursework (including credit or non-credit) at the University during any given academic session (including fall or spring semesters, Summer Session, or January Term).

## Third Party

**Description**

An organization or individual or external program from outside of the University that uses University facilities to conduct a covered program pursuant to an approved contract or other use agreement with a permission-granting University academic or administrative unit (e.g., athletic camp, Contracted Independent Organization (CIO)-operated program, or academic camp).

## University Facility

**Description**

Any defined space of the University, including but not limited to a room, lab, series of labs, building, or controlled outdoor area (which includes the Academical Village).

## University Property

**Description**

Land or buildings that the University owns or leases and that is under the control of the Board of Visitors. University property also includes premises the University uses for activities of its offices, departments, personnel, or students.

## Visiting Faculty

**Description**

Visiting faculty receive academic appointments at the University to participate in teaching, research, or clinical work in a sponsoring department or school while maintaining affiliation with their primary place of employment. They may serve as the instructor of record for courses offered for credit at the University.

## Visiting Scholar

**Description**

Visiting scholars receive appointments at the University to participate in scholarly or research activities in a sponsoring department or school while maintaining affiliation with their primary place of employment. They are not considered faculty and thus may not serve as the instructor of record for any course offered for credit at the University.

## Volunteer

**Description**

An individual permitted under specific conditions to perform agreed upon activities on behalf of the University, but not in an employment capacity and therefore is not entitled to compensation and employment benefits.

**Policy Statement**

Associated individuals, visiting faculty, visiting scholars, and volunteers who interact with minors on Grounds or under the authority of the University at other locations must contact the Office of Youth Protection to determine whether their program or activity must comply with the provisions of this policy. All associated individuals, visiting faculty, visiting scholars, and volunteers who work with or interact with minors must be familiar with and comply with the provisions of this policy, any related University policies, and applicable procedures. This includes a program or activity conducted on University property, in a University facility, or under the authority of the University at another location. In addition, third parties who have been granted permission by a University entity for use of a University facility must adhere to this policy and associated procedures.

Licensed child day centers operated by the University are exempt from this policy due to adherence to separate state regulations as licensed facilities in Virginia.

**Immediately report ANY suspected criminal activity to police (call 911).**

**Promptly report ANY suspected criminal activity, any serious or concerning behavioral incidents, or any sexual activity involving minors in association with the program (including that considered consensual by any of the involved parties) to the Office of Youth Protection and to the parents/guardians.**

I. **Reporting Suspected Child Abuse and Neglect:**

A. **Requirement to Report:**
All associated individuals, visiting faculty/scholars, volunteers, and third party members of the University community who, in their professional or official capacity have reason to suspect child abuse or neglect, must report the matter immediately to the local Department of Social Services of the county or city wherein the child resides or wherein the abuse or neglect is believed to have occurred or to the Virginia Department of Social Services (DSS) toll-free child abuse and neglect hotline (1-800-552-7096), as well as to the University of Virginia Office of Youth Protection via *Just Report It* as set forth in Section IV, Responsibilities. If the suspected child abuse or neglect presents an imminent or ongoing danger or emergency, contact 911 immediately. [For more detail on what constitutes child abuse or neglect, refer to VA Code 63.2-100.]

No person is required to make a report if the person has actual knowledge that the same matter has already been reported to the Department of Social Services' child abuse and neglect hotline and the University of Virginia Office of Youth Protection. If there is any doubt about whether a report has been made or included all relevant information, an additional report shall be made.

No person is required to make a report if the minor child is emancipated as set forth under Virginia State law (in particular, § 16.1-334 7 Effects of order, that "the minor may not thereafter be the subject of a petition under this chapter as abused, neglected, abandoned, in need of services, in need of supervision, or in violation of a juvenile curfew ordinance enacted by a local governing body").

Note: When providing patient care within or for the benefit of the Medical Center, all persons, regardless of employer, shall follow UVA Medical Center Policy Abuse, Neglect or Exploitation of Patients.

B. **Protection for Reporting Parties:**
Pursuant to Virginia Code § 63.2-1509, any person who makes a report or provides records or information o suspected child abuse or neglect to the Virginia Department of Social Services or who testifies in any judici proceeding arising from such report, records, or information shall be immune from any civil or criminal liability or administrative penalty or sanction on account of such report, records, information, or testimony, unless such person acted in bad faith or with malicious purpose.

II. **Additional Incident Reports:**
The University has provided a mechanism for program staff/volunteers, youth participants, and families to make a report of concerning behavior (see Section III.L.).

III. **Requirements for Programs and Activities Involving Minors:**
Programs and activities involving minors will be assessed by the Office of Youth Protection for both safety levels and alignment with the University's mission and strategic goals. *Programs and activities will be designated as covered programs and non-covered programs, with additional requirements for covered programs.* For any progra and activity involving minors, consideration will be given to the level of access staff may have to minors. For both covered programs and non-covered programs, reports of suspected child abuse and neglect may be required, as we as additional incident reports.

A. **Types of Activities Involving Minors:**
Types of activities involving minors are classified into two categories – covered programs and non-covered programs.

1. **Covered Program:**
There are three Tiers of covered programs:

a. **Tier I** - Generally includes a one-time or non-recurring program or activity in which an entity (e.g. non-University affiliated school or community group) brings a group of non-matriculated minors onto Grounds or another University property, and the non-University affiliated adult chaperones maintain custodial care during the event or activity. Examples include but are not limited to:
- Programs where the expectation is a minor's parent or guardian will be present.
- Vetted groups (generally, youth serving organizations for children in preschool through 12th grade, including school groups) visiting University premises for the purpose of participating in University-operated tours, or as patrons of educational or entertainment events with the children being in the care and custody of the touring or visiting staff.
- Research programs that are subject to the Institutional Review Board guidelines, policies, and oversight for research involving human subjects **and** where a parent/guardian will be present.

b. **Tier II** – Generally, non-residential programs, camps, or activities for non-matriculated/non-enrolled youth visiting the University Grounds or other locations under the control of the University, in which a non-parent/non-legal guardian (both UVA-affiliated and third party) is assuming custodial care of minors. Examples include but are not limited to:
- Recurring programs.
- Programs with low-to-moderate levels of physical activity.

c. **Tier III** – Generally, programs, camps, or other activities for or involving youth that are residential and/or involve certain activities. Examples include but are not limited to:
- Programs involving overnight stays.
- Programs with high levels of physical activity, including sports activities.
- Activities in laboratories.
- Internships for non-matriculated/ non-enrolled minors.
- Mentorships for non-matriculated/non-enrolled minors.
- Minors serving as volunteers. (For additional policies and procedures relevant to minors participating as volunteers in University programs, see HRM-001: Authorization and Engagement of Volunteers.)

2. **Non-Covered Program:**
   Non-covered programs include:
   - University classes (as listed in the University catalog) that have matriculated or enrolled studen under the age of 18.
   - Events such as UVA collegiate sporting events, concerts, festivals, speaker series, and other educational or entertainment events on University property that are open to the general public where minors may be present but are not in the care or custody of University staff. This include UVA Admissions tours.
   - Health Systems patient interactions (which are governed by regulations and legal reporting requirements relating to clinical activities).
   - University residential housing agreements wherein the minors present are (i) University student or (ii) dependents of University students or employees residing with the student/employee in University residential housing for families.
   - Non-University programs where the only involvement of the University is in assisting with the placement of University students as volunteers, interns (i.e., individuals who are completing an internship – a supervised, credit-bearing learning experience in a professional setting focused o applying skills and concepts from a program of study into authentic contexts), etc., and the program is not located on University property.
   - University programs where the only involvement of a minor is in the capacity as an employee.

B. **Permission-Granting Unit:**
   All programs/activities for minors must have a University permission-granting unit, and the permission-granting unit must identify a designee to coordinate the registration, background check, and training process for covered programs.

   Third parties must adhere to the provisions of policy PRM-017: Duties Toward Speakers and Use of University Facilities or Property, Section 1.b, to first obtain approval to hold the activity/program on University property. A program is considered a third-party program when the opportunity is initiated by a third party; and a University Program when the University initiates the opportunity.

C. **Registration and Approval:**
   Registration is required for all Tiers of covered programs. Registration is not required for non-covered programs. Programs/activities for minors must be approved by the head of the permission-granting unit or designee. The program director is responsible for registering programs with the Office of Youth Protection. Registration must be completed no later than 30 calendar days prior to the commencement date of the program.

   The covered program will be approved to operate only if the required registration information is complete, and if minimum covered program staffing ratios are met based on the anticipated number of minors attendin the covered program. The University has also established a minimum age of eight years old on first day of program operation for minors attending an overnight covered program.

   Any third party conducting a covered program on University property must have coverage of insurance and the permission-granting unit designee must contact the Office of Property & Liability Risk Management pri to the covered program to confirm coverage level.

D. **Screening Associated with Programs/Activities for Minors:**
   The University requires the following screenings for individuals participating in certain programs/activities for minors.

1. **Applications:**
   For Tier II & III covered programs, a written application must be obtained from all covered program staff not employed by the University. Applications must communicate that abuse will not be tolerated Covered programs must also conduct a live interview with these individuals and complete at least thre reference checks to assess their suitability for working with minors. Program directors must attest that all non-UVA covered program staff have undergone this additional screening and securely maintain these screening documents as part of the covered program's overall records. Evidence of compliance may be requested at any time by the Office of Youth Protection.

2. **Mandatory Background Check:**
   In addition to HRM-034 requirements for employee background checks, a background check must be completed for all covered program staff operating programs in Tiers II & III.

   Background checks must be completed for new covered program staff prior to a covered program staf member having any direct contact with minors as part of a covered program. For covered program sta not subject to HRM-034, a background check with a satisfactory outcome completed within 24 month prior to the end of the covered program will satisfy this requirement.

   The background completion date for each covered program staff member must be included in the registration with the Office of Youth Protection.

   Background checks must:
   - Comply with the Fair Credit Reporting Act (FCRA).
   - Cover a minimum of 7 years of Criminal History verification at the county, national, and international (if applicable) levels.
   - Include an alias search (if applicable).
   - Include a national Sexual Offender check.
   - Have been completed within the previous 24 months of the covered program session end-date. (The sole exception is for Credentialed Staff who are required by licensure to complete a background check every 36 months to maintain clinical privileges. They will follow that background check cadence.)

   Each permission-granting unit or its designee will be required to submit the background check results the Office of Youth Protection for all covered program staff at least 72 hours prior to the start of the covered program session. Should a covered program staff person be an employee of the University wh has had a University-run background check in the last 24 months, the permission-granting unit or thei designee may indicate that on the submission form.

   Covered program staff may **not work** in any covered program until their background check is completed, reviewed, and approved.

   Associated individuals must obtain background checks through the University. If third party, visiting faculty/ scholars, and volunteer-covered program staff wish to use a background check not obtained through the University, prior approval must be received from the Office of Youth Protection.

   An additional review of applicable University records may be conducted to determine a covered program staff person's ability to work with minors.

3. **Ongoing Responsibility to Disclose Criminal Convictions:**
   See HRM-034 for details on employees' ongoing responsibility to disclose criminal convictions. From the date of the last background check, any covered program staff convicted for any crime (excluding moving traffic violations) has five calendar days to report the conviction. In accordance with HRM-03 University employees disclose via the online employee conviction disclosure form.

   Covered program staff who are students report in accordance with STAF-003: Statement of Students' Rights and Responsibilities.

   Covered program staff who are not employees report via the self-disclosure form.

4. **Interview Questions:**
   For Tier II & III covered programs, interviews must be conducted with all potential employees and volunteers working with youth programs. Behavioral-based questions are utilized to solicit examples the applicant's previous actions to verify the applicant possesses the skills needed to fill the role and t see if the applicant demonstrates characteristics of someone who is able to work with youth. At least two members of staff must participate in the interview process.
5. **Reference Checks:**
   Conduct a minimum of three reference checks before offering a position to an applicant. Both persona and professional references must be included. Consistent reference questions must be asked and detailed notes provided to the hiring staff so potential red flag behavior does not go unnoticed.

E. **Training for Covered Program Staff:**
In addition to any training required by a department or permission-granting unit, all covered program staff serving Tier II or III programs are required to complete the University of Virginia online Youth Protection Training Module at least 72 hours prior to the start of the covered program. Returning covered program staf must complete the Youth Protection Training Module every 12 months.

Additional training for covered program staff (e.g., red-flag behavior, peer-to-peer abuse) may be required b the Office of Youth Protection for covered program staff.

NOTE: Training may be made available to staff of non-covered programs as well.

F. **Code of Conduct for Protection of Minors:**
Participants in covered programs, family members of participants in covered programs, attendees of covered programs, covered program staff, other visitors to covered programs, and associated parties for covered program events/activities involving minors on University Grounds or under the authority of the University a other locations are expected to always adhere to the Code of Conduct for Protection of Minors. Each program/activity must:

- Create a code of conduct for staff, youth participants, and family members/guardians of youth participants.
- Include all requirements in the code of conduct for the protection of minors (see Appendix A).
- Include a statement in the code of conduct that abuse will not be tolerated. Violations of the code of conduct may result in disciplinary action, up to and including immediate termination.

G. **Ratios of Covered Program Staff to Minors:**
Program staff must actively avoid one-on-one contact with minors outside the presence of others.

In those situations where one-on-one interactions are unavoidable due to an emergent situation, follow these additional requirements:

1. Choose a public setting that is open and observable.
2. Use appropriate contact – limit shows of affection to pats on the shoulder, high fives, and handshakes
3. Document one-on-one interactions and notify a supervisor.
4. Arrange random checks (especially for recurring one-on-one programs/activities).

For youth programs, such as mentorship programs, in which a program director wishes to gain an exemption in order to conduct a one-on-one youth program, a program director must seek special permission from the Office of Youth Protection by contacting youthprotection@virginia.edu, and will be required to follow additional requirements.

For residential covered programs, the minimum number of covered program staff to minors will be one covered program staff per the ratios below. Ratios must be maintained overnight.

| **Age Group** | **Number of Minors** | **Staffing Requirement** |
|---|---|---|
| Under 8 | Not Permitted Overnight | Not Permitted Overnight |
| 8 years old | 6 | Minimum of 1 covered program staff per the number of minors noted by age group. Example: group of 9 "9 – 14 years old" requires 2 staff members. |
| 9 - 14 years old | 8 | |
| 15 - 17 years old | 10 | |

For non-residential covered programs, the minimum number of covered program staff to minors will be one covered program staff per the ratios below:

| **Age Group** | **Number of Minors** | **Staffing Requirement** |
|---|---|---|
| 4 - 5 years old | 6 | Minimum of 1 covered program staff per the number of minors noted by ag group. Example: group of 13 "4 – 5 years old" requires 3 staff members. |
| 6 - 8 years old | 8 | |
| 9 - 14 years old | 10 | |
| 15 - 17 years old | 12 | |

For non-residential covered programs with minors under the age of four, contact the Office of Youth Protection for guidance on ratios.

For covered programs serving minors between 6-13 years of age, program directors are required to review guidelines from the Virginia Department of Education (VDOE) regarding child day programs or child day

centers.

H. **Staff Age:**
80% or more of covered program staff must be at least 18 years old. Covered program staff must be at least 16 years old and be at least two years older than the minors with whom they work. In special needs programs/activities, 100% of covered program staff must be at least 18 years old.

I. **Emergency Plans:**
Covered programs must have emergency plans in place. The Office of Youth Protection, in partnership with UVA Emergency Management, has created an emergency plan template for use if needed in creating one. During a University-declared critical incident, if on University Grounds, in a University facility, or on University property, programs must follow University guidance. Program directors are required to sign up for UVA Alerts, text "UVA" to 226787.

J. **Medication Procedures:**
For covered programs during which medication may need to be taken by a minor participant, medication procedures must be established and followed.

K. **Americans with Disabilities Act (ADA):**
Covered programs are required to ask about potential accommodations necessary for minor participants and sample language has been provided by UVA's Office of Equal Opportunity and Civil Rights (EOCR), which can be found in the Office of Youth Protection resource library. EOCR is available to answer ADA-related questions for University-operated programs.

L. **Incident Reports:**
Program staff/volunteers, youth participants, and families, report criminal activity and concerning behavior as noted below.

- Immediately report ANY suspected criminal activity to police (call 911).
- Promptly report ANY suspected criminal activity, any serious or concerning behavioral incidents, or any sexual activity involving minors in association with the program (including that considered consensual by any of the involved parties) to the Office of Youth Protection and to the parents/guardians.
- *Program Staff:* In addition to reporting suspected child abuse and neglect as covered in Section I, program directors (or designated program staff persons) are required to report incidents/inappropriate behavior or concerns (including grooming behavior and boundary violations) to the Office of Youth Protection through the Protection of Minors Incident Report form or by email (youthprotection@virginia.edu). (Note: Refer to the final bullet point for non-exhaustive examples of incidents/inappropriate behavior or concerns.)
- *Parent/Guardian/Youth Participant:* Incidents/inappropriate behavior or concerns regarding conduct occurring as a result of participation in a youth program may be reported to the Office of Youth Protection through the Protection of Minors Incident Report form, by email ( youthprotection@virginia.edu), or phone (434-924-7860). (Note: Refer to the final bullet point for non-exhaustive examples of incidents/inappropriate behavior or concerns.)
- All covered programs for minors must include information for youth and families regarding how to report incidents/inappropriate behavior or concerns.
- The Office of Youth Protection staff may review incidents/inappropriate behavior or concerns involving but not limited to the following to identify any trends and safety concerns:
    - Vehicle collisions involving minor program participants.
    - Violations of University policies, including the policies of the program and applicable codes of conduct.
    - A minor requiring medical treatment beyond first aid.
    - Any other incidents/inappropriate behavior or concerns related to a program in which a minor participates.

M. **Parent/Guardian Consent:**

1. Tier II & Tier III covered programs shall obtain written or electronic permission from the parent/guardian of any minor to participate in the program. If the signature is electronic, the signatory must acknowledge their electronic mark serves as a signature.
2. If the program takes place in a virtual environment, that designation and the type of virtual platform must be stated clearly for the parent/legal guardian.

N. **Record Retention:**
All University programs/activities for minors and third party programs operating on University property must follow IRM-017: Records and Information Management.

O. **Policy Exceptions:**
The Office of Youth Protection must approve exceptions to this Policy (contact youthprotection@virginia.edu).

IV. **Responsibilities:**
Pursuant to this policy and Virginia state law, ***all persons who are either 18 years of age or older; provide custodial care to minors; are employed by the University (except for University Counsel); or who fit within some other reporter category as outlined in Virginia state law***, are responsible for, if in their professional or official capacity they have reason to suspect child abuse or neglect, reporting suspected child abuse or neglect to the Virginia Department of Social Services (DSS) via the toll-free child abuse and neglect hotline 1-800-552-7096 and to the Office of Youth Protection via *Just Report It* as soon as possible but not longer than 24 hours after having reason to suspect an offense.

The ***Office of Youth Protection*** is responsible for:
- Determining if a program or activity is to be considered a "covered program," which Tier it belongs in, and whether a program or activity involving non-matriculated youth is a non-covered program.
- Providing centralized program registration and Youth Protection training.
- Establishing procedures related to covered programs and certain other programs/activities involving minors.
- Approving a covered program to operate based on compliance with registration, age requirement for residential programs, training, background check requirements, and other components.
- Collecting reports of suspected child abuse and neglect.
- Maintaining a list of covered programs.
- Fulfilling all other reporting requirements as required by University policy unless the Office of Youth Protection staff has actual knowledge that the report was already made.

The ***permission-granting unit*** of a covered program is responsible for:
- Designating an individual to (1) obtain written or electronic permission from the parent/guardian of any minor to participate in the program (as stipulated in Section III.M); and (2) oversee completion of:
  - Covered program registration
  - Background checks
  - Required youth protection training
  - Associated procedures
- Immediately notifying the Office of Youth Protection of any non-compliance.
- Verifying coverage of insurance for covered programs conducted by third parties and contacting the Office of Property & Liability Risk Management to confirm coverage.
- Verifying unassociated individuals have met all facilities requirements applicable to the space in which the program occurs.

The ***head of a permission-granting unit*** is responsible for:

- Confirming that a covered program is in compliance with applicable policies and procedures of the University.
- Immediately notifying the Office of Youth Protection of any non-compliance.

***Covered program staff*** are responsible for:

- Reporting suspected child abuse or neglect to the Department of Social Services and the Office of Youth Protection as soon as possible but not longer than 24 hours after having reason to suspect an offense if, in their professional or official capacity, they have reason to suspect child abuse or neglect.
- Immediately reporting ANY suspected criminal activity to police (call 911).
- Promptly reporting ANY suspected criminal activity, any serious or concerning behavioral incidents, or any sexual activity involving minors in association with the program (including that considered consensual by any of the involved parties) to the Office of Youth Protection and to the parents/guardians.
- Immediately notifying the Office of Youth Protection of any non-compliance or other red flag incidents involving minors occurring in the associated covered program.
- Completing required Youth Protection training at least 72 hours prior to the start of the covered program and every 12 months thereafter for returning covered program staff.
- Completing background check requirements at least 72 hours prior to the start of the covered program.
- Maintaining care, guidance, control, or supervision of minors in covered programs while in their custody of care until custody has been transferred back to the parent or legal guardian. Program staff must actively avoid one-on-one contact with minors outside the presence of others during or after the program.
- Remaining on site (program director or designee) during overnight residential programs.
- Establishing and adhering to procedures for formal transition for custody of care.
- Submitting training and background check completion information to the permission-granting unit.
- Following other procedures as required by the Office of Youth Protection.

V. **Compliance with Policy:**

In accordance with Virginia law (Code of Virginia, Title 63.2, Chapter 15), any person:

- Required to make a report of suspected child abuse or neglect and who fails to do so as soon as possible, but not longer than 24 hours after having reason to suspect a reportable offense of child abuse or neglect, shall be fined not more than $500 for the first failure and for any subsequent failures not less than $1,000.
- Who knowingly and intentionally fails to make a report in cases involving rape, sodomy, or object sexual penetration, is guilty of a Class 1 misdemeanor.
- Required to file a report pursuant to the Code of Virginia who fails to do so as soon as possible, but not longer than 24 hours after having reason to suspect a reportable offense of child abuse or neglect where such reportable offense is alleged to have occurred at (i) a private or state-operated hospital, institution, or facility to which children have been committed or where children have been placed for care and treatment or (ii) any public or private organization responsible for the care, custody, or control of children is guilty of a Class 1 misdemeanor, and a second or subsequent violation of this subsection is a Class 6 felony.

Failure to comply with the requirements of this policy and the associated procedures may result in disciplinary action up to and including termination or expulsion in accordance with relevant University policies.

Failure to comply with this policy by unpaid volunteers, interns, and visiting faculty/scholars may result in an end of the assignment.

Failure to comply with this policy by third party covered program staff may result in disciplinary action that requires immediate removal from direct contact with minors, and/or University property and facilities.

Direct questions about this policy to the Office of Youth Protection.

**Procedures**

See the Office of Youth Protection website.
Protection of Minors Incident Report form
*Just Report It* - Reporting through Just Report It allows a reporter to meet multiple University reporting requirements.

**Related Information**

HRM-001: Authorization and Engagement of Volunteers
HRM-034: Background Checks and Ongoing Responsibility for Employees to Disclose Criminal Convictions
HRM-041: Addressing Sexual and Gender-Based Harassment and Other Forms of Interpersonal Violence and Reporting Disclosures
IRM-017: Records and Information Management
PRM-014: Use and Management of University Vehicles
PRM-017: Duties Toward Speakers and Use of University Facilities or Property
SEC-035: Clery Act Compliance
PROV-020: Minors, Family Members, or Other Individuals Accompanying Education Abroad Program Staff
STAF-003: Statement of Students' Rights and Responsibilities

UVA Medical Center Policy:
Abuse, Neglect or Exploitation of Patients
Management of Observers and Mentees at the Medical Center

Code of Virginia § 63.2-1509. Requirement that certain injuries to children be reported by physicians, nurses, teachers, etc.; penalty for failure to report.

**Major Category** Human Resource Management

**Next Scheduled Review** Sunday, November 19, 2028

**Revision History**

Clarification of program vs covered program in various sections 9/17/26; Added Section III.M, updated Section III.L, IV and V 8/26/26; Updated Responsibilities Covered Program Staff 2/19/26; Revised 11/19/25; Updated Section II.2, II.8 and III to reflect minimum age for covered overnight programs; Updated Sections 7, 8, and Code of Conduct 12/21/22; Updated Section 3 6/30/22; Edited Appendix 12/16/21; Edited Policy and Appendix 9/7/21; Edited Appendix 4/22/21; 7/23/20; Edited 4/27/20.

**Category Cross Reference**
Safety, Security and Environmental Quality

**Approved By** Executive Vice President and Chieft Operating Officer

**Approved Date** Monday, June 17, 2019