

3. Ensure that program staff complete training regarding care of minors.
4. Obtain satisfactory background checks of supervising staff.
5. Gather appropriate documentation (e.g., signed waivers).
6. Ensure that minors are appropriately supervised during the program.

External Youth Programs operated by K-12 schools or school districts

1. Identify an NKU employee to serve as primary liaison with the program.
2. Register the program.
3. School must sign an appropriate host agreement with NKU, if requested by NKU.
4. School must ensure that supervising staff have received a satisfactory background check.

Other External Youth Programs

1. Identify an NKU employee to serve as primary liaison with the program.
2. Register the program.
3. External entity must sign an appropriate host agreement with NKU, if requested by NKU.
4. External entity must ensure that supervising staff have received a satisfactory background check.

MANDATORY REPORTING OF ABUSE OR NEGLECT; REPORTING OF OTHER INCIDENTS

All individuals involved in Youth Programs must comply with applicable laws and NKU policies.

In particular, individuals must comply with state laws regarding mandatory reporting of abuse or neglect of minors. If anyone involved in a Youth Program witnesses or suspects the abuse or neglect of a minor, whether as part of the Youth Program or otherwise, the individual must immediately report the matter to the NKU Police Department or other appropriate law enforcement agency. An individual does not have to know for certain that abuse has taken place. *Wherindt, ept* .

Kentucky state law requires the reporting of neglect, physical, sexual, and emotional abuse and dependency of children. The failure to report may result in criminal charges, per [KRS 620.030](#).

Retaliation against an individual who makes a good faith report regarding suspected or known misconduct or participates in the investigation of such reports is prohibited.

Also, NKU employees who observe or become aware of incidents involving personal injury, harassment, or other serious misconduct in a Youth Program should immediately report it to Human Resources.

OBTAINING POLICY EXEMPTIONS

To seek an exemption or clarification whether a program is subject to this policy, contact the Office of Legal Affairs at minorsoncampus@nku.edu. Legal Affairs and Human Resources are authorized to grant policy exemptions, with input from the relevant NKU division, college, department, school, or office.

Also, it may be appropriate to excuse particular policy requirements for certain large events and other unique programs. Large events with hundreds of attendees in open spaces, with no small-group or one-on-one component, may pose less risk than other Youth Programs and may warrant relief from certain requirements.

Although Youth Programs covered by this policy typically must be registered, Human Resources and Legal Affairs may grant exceptions from other policy requirements when appropriate.

CO-ORGANIZED YOUTH PROGRAMS

Many Youth Programs are co-organized by NKU and an external entity. For those programs, an NKU employee typically must serve as Program Leader and register the program. NKU is responsible for ensuring that staff it provides meet other policy requirements (e.g., background checks for NKU supervisors). Other requirements may apply separately to the external entity.

As noted above, off-campus events that serve minors and are organized by external entities, and not NKU, are not subject to this policy, even though those events may be staffed in part by NKU employees or students.

ONE-ON-ONE CONTACT IN YOUTH PROGRAMS

One-on-one contact between a staff member and a child in a Youth Program, especially when it occurs for extended periods or when the interactions are in non-observable settings, warrants special attention and protections. When possible, programs should be structured to avoid such contact. When one-on-one interactions are necessary, a background check of the staff member typically will be required.

TEMPLATE DOCUMENTS

Program Leaders (defined in Section II below) for NKU Youth Programs must use the templated agreements, releases, and other program documents provided by Legal Affairs.

K-12 schools and other external entities may use their own templated forms as long as they comply with the requirements of the Youth Program-related agreements they sign with NKU.

YOUTH PROGRAM RECORDS

Human Resources and Legal Affairs will maintain official records for each NKU Youth Program that reflect completion of training, background checks, and other elements required by this policy.

Program Leaders and NKU Liaisons (defined in Section II

II. POLICY REQUIREMENTS FOR COVERED PROGRAMS

POLICY REQUIREMENTS FOR NKU YOUTH PROGRAMS

NKU Youth Programs must be operated in compliance with the requirements described below:

1. Identify a Program Leader.

- x Every NKU Youth Program must identify an individual NKU employee who is responsible for the program. **Program Leader**
- x The Program Leader must be involved in the planning and administration of the program.
- x Program Leaders must be NKU employees unless an exemption is granted by Human Resources and/or Legal Affairs.

2. Register the NKU Youth Program.

- x All NKU Youth Programs must be registered in advance with Legal Affairs and Human Resources. **Registration must be completed at least 30 days in advance of the program**, but additional advance notice is encouraged. Annual programs must be registered each year.
- x The Program Leader must register the program by providing the program name, date(s), location, and other basic information. To register a program, please send an email to minorsoncampus@nku.edu that includes the required registration information listed at <https://inside.nku.edu/ethics/minors.html>. Questions may be directed to minorsoncampus@nku.edu.
- x In addition, prior to commencement of the program, the Program Leader must submit a completed Program Leader, Employee & Volunteer List, which identifies the program staff.
- x Revised forms must be submitted if information is updated or added (e.g., additional staff members are added). Please send updated documents to minorsoncampus@nku.edu.
- x **This is a registration process**. The purpose of registration is to ensure compliance with industry standard practices regarding minors on campus. Human Resources and Legal Affairs will not approve or deny proposed events but will address and escalate noncompliance issues as needed.

3.

POLICY REQUIREMENTS FOR OTHER EXTERNAL YOUTH PROGRAMS

External Youth Programs that are operated, organized, or supervised by external entities other than K-12 schools must follow the requirements listed below. Such programs include conferences and sports and other camps run by NKU employees in their personal capacities.

1. Identify an NKU Liaison.

- x Every External Youth Program must identify an NKU employee to serve as a liaison to the F D P S NKU Liaison. The NKU Liaison may be an employee who is affiliated with the program or who assists the external entity in securing use of campus space. In unusual cases where no other NKU employee is available, Human Resources or Legal Affairs may identify an appropriate NKU Liaison.

x

4. The external entity must obtain satisfactory background checks of all Supervising Staff.

- x Before working with minors in the program, all Supervising Staff (defined below) must be cleared with a satisfactory background check.
- x Exceptions may be granted by Human Resources and/or Legal Affairs.
- x **Supervising Staff** is defined as any individual who is responsible for the care, instruction, guidance, and oversight of minors during the Youth Program. Supervising Staff include the Program Leader and others who supervise program activities. It also includes any individual who will have personal, unsupervised one-on-one interactions with a minor during the program outside the workplace.
- x Supervising Staff does not include individuals who have only incidental or momentary interactions with minors during the program. It also does not include individuals who interact with minors only while under the in-person supervision of Supervising Staff.
- x Results of background checks are not required to be provided to NKU. However, it is expected that the external party will not allow any individual to work in a Youth Program who has a conviction, pending charge, or has pled guilty or no contest to, any crime involving violence, sexual misconduct, or burglary.
- x The background check of Supervising Staff must include a check of federal, state, and local criminal court records, including the [Kentucky Sex Offender Registry](#). A satisfactory background check that is dated within five (5) years of the program start date will meet the requirements of this section.
- x The cost of background checks for External Youth Programs will not be paid by NKU.

III. REFERENCES AND RELATED MATERIALS

REFERENCES & FORMS

NKU Office of Compliance & Institutional Ethics: [Programs or Activities with Minor Participants](#)

RELATED POLICIES


- [Employment of Minors](#)
- [Children in the Workplace](#)

REVISION HISTORY

REVISION TYPE	MONTH/YEAR APPROVED
New Policy	June 10, 2024

MINORS ON CAMPUS

PRESIDENTIAL APPROVAL

PRESIDENT		
Signature		Date
Cady Short-Thompson		

BOARD OF REGENTS APPROVAL

BOARD OF REGENTS (IF FORWARDED BY PRESIDENT)
<ul style="list-style-type: none">This policy was forwarded to the Board of Regents on the Presidential Report (information only)