



Cornell University

The Protection of Minors
and Abuse Reporting
Compliance Manual for
Program Directors:
Ithaca/Geneva

Cornell University

Abuse Reporting and the Protection of Minors Compliance Manual: Ithaca/Geneva

TABLE OF CONTENTS

I.	Introduction.....	4
II.	Definitions & Acronyms.....	5-7
III.	Roles and Responsibilities.....	7-8
	Checklist for Program Directors.....	9-10
	<u>Programmatic Requirements:</u>	
IV.	Policy Compliance & Registration.....	10
V.	Supervision.....	11-13
VI.	Consent.....	13
VII.	Behavioral Standards for Youth Participants.....	13-14
VIII.	Mechanisms for Participant Feedback.....	14
IX.	Safety Plan.....	14-15
X.	Check-In/Check-Out Procedures.....	15-16
	<u>Requirements for Authorized Persons:</u>	
XI.	Background Checks.....	16
XII.	Training.....	16-17
XIII.	Standards of Behavior for Authorized Persons.....	17
XIV.	Reporting.....	17-18
	<u>Institutional Requirements:</u>	
XV.	Incident Response.....	18-19
XVI.	Third Party Requirements.....	19
	Appendices	

APPENDIX

TITLE

A	Registration Procedures
B	Sign-In/Sign-Out Template
C	Background Check Procedures
D	Training Procedures
E	Standards of Behavior
F	Signs and Symptoms of Abuse and Maltreatment
G	Virtual Program Safety

I. INTRODUCTION:

Cornell University is committed to creating and maintaining safe and ethical environments for all those who work at, study at, or visit its campuses while supporting the University's mission. In addition, the University promotes and provides a standard of operation that is compliant with federal, state, and local laws and regulations regarding minors, demonstrates sound fiscal responsibility, and reduces institutional liability. Toward that end, the University has put measures in place to keep the environment for minors free from the threat of physical injuries, emotional harm, abuse, sexual abuse, maltreatment, and neglect.

This compliance manual is implemented in accordance with [Policy 8.8 The Protection of Minors and Abuse Reporting](#). The Children and Youth Safety Office collaborated with experts from Praesidium Inc., The Higher Education Protection Network (HEPNet), United Educators, the American Camp Association (ACA), The New York State Department of Health, federated youth-serving organizations, and other authoritative sources on abuse prevention to incorporate research-based practices in Policy 8.8 and this compliance manual.

Individuals are encouraged to contact Cornell University's Children and Youth Safety Office whenever they expect to participate in a program that serves minors.

Note that programs found to have violated the compliance elements of this policy may be subject to a delay in program start, removal of authorized persons from positions which include interaction with minors, cancellation of the program, or revocation of the ability to hold such programs in the future. Student organizations found to be noncompliant with this policy also risk the loss of organizational funding and/or recognition from Campus Activities and Sorority & Fraternity Life. Some violations of the Standards of Behavior for Working with Youth are also violation of New York State law.

Contacts:

Cornell University's Youth Protection Manager: Alyson Murphy am2987@cornell.edu

Cornell University's Youth Program Administrator: Paula Griffin phg1@cornell.edu

General Inquiries: youthprogramadministrator@cornell.edu

Website: <https://youthsafety.cornell.edu>

Cornell University's Director of Risk Management and Insurance: Nakeschi Watkins
nnw6@cornell.edu

General Inquiries: risk_mgmt@cornell.edu

Risk Management website: <https://risk.cornell.edu>

II. DEFINITIONS & ACRONYMS:

Abuse	Any act committed by a person legally responsible for the care of a minor that results in physical or emotional injury or creates substantial risk of physical or emotional injury.
Authorized Persons	Any individuals, paid or unpaid, who interact with, instruct, supervise, chaperone, or otherwise oversee minors in program activities. This includes, but is not limited to, faculty, staff, volunteers, graduate and undergraduate students, interns, employees of temporary employment agencies, and independent contractors/consultants. The authorized adult's roles may include positions such as, but not limited to, counselors, chaperones, coaches, mentors, tutors, or instructors.
Child Molestation	Any actual or alleged illegal or otherwise wrongful sexual conduct with a minor.
Custodial Care	Any situation in which an authorized person assumes temporary responsibility over a defined time period for the supervision of a minor, for the purpose of the minors engaging in a youth program/activity.
CYS	Children and Youth Safety Office.
Direct Contact	<p>Includes any individual who:</p> <ul style="list-style-type: none"> • Is involved with the care, supervision, guidance, or control of minors; • Has routine interaction with minors; • Works with or around minors for one or more programs; • Works with or around minors on a program that meets regularly or involves multiple interactions; • Has the potential for unsupervised access with a minor; • Is responsible in any way for supervision of minors; • Is a consistent and regular volunteer for programs involving minors; <p>or</p> <ul style="list-style-type: none"> • Interacts with minors on anything more than an infrequent basis. <p>Note that direct contact includes in-person, virtual, and electronic contact. Direct contact may occur on- or off-campus.</p>
HR	Human Resources
Incidental Contact	<p>Includes any individual who:</p> <ul style="list-style-type: none"> • Is not involved with the care, supervision, guidance, or control of minors; • Does not have consistent, regular, routine, or frequent interactions with minors; and • Does not have the potential for unsupervised access to minors.

	Examples of individuals who have incidental contact with minors includes, but is not limited to, guest speakers, lecturers, presenters, field trip tour guides, contest evaluators, scorekeepers, judges, or moderators.
Maltreatment	Any failure of a person legally responsible for the care of a minor to exercise the minimum degree of care in providing the child with any of the following: food, shelter, education, or medical care when financially able to do so. Maltreatment also includes abandonment of a minor or not providing adequate supervision of a minor.
Mandated Reporter	A professional who is required by New York state law to report suspected child abuse and neglect. Mandated Reporters include doctors, nurses, teachers, peace and police officers, mental health professionals, childcare workers, and some state employees. See the state summary guide for more information.
Minor	Any person under 18 years of age who is not, for the purpose of this policy, (a) a student as defined herein or (b) an employee of the university.
Program	An organized activity or set of activities designed to include minors offered by various academic or administrative units of the university, student organizations, or third parties using university facilities. This includes, but is not limited to, academic or recreation activities, day camps, workshops, sports or coaches' camps, residential programs, commuter programs, conferences, and internships. Programs may take place on or off university premises or virtually.
Program Director	Individual responsible for managing a program, whether or not that individual has another job or position title.
Reasonable Cause	According to New York state law, reasonable cause means that you have logical reason to believe that a youth is being abused or maltreated; it does <u>not</u> mean that you must be certain or have proof. This can be based on witnessing a single incident, something a child says to you, an implausible explanation for an injury, or a combination of warning signs.
RMI	Risk Management and Insurance Office.
Rule of Three	At least three people should be present for every interaction between adults and minors, whether that interaction is taking place in person, online or electronically. At least two of those people should be authorized persons, or one authorized person and one parent/guardian/other chaperone.
Sexual Abuse	Any actual or alleged child molestation or serial sexual misconduct with a minor.
Sexual Misconduct	Any actual or alleged sexual harassment, child molestation, sexual assault, sexual abuse, or wrongful sexual conduct.

Student	Undergraduate, graduate, medical, veterinary, and professional students upon their commencement of attendance, defined as the earliest day of: the first day of the term for which they were admitted; their first day residing in a University residence hall; the first day of a University-sponsored pre-orientation trip, activity, or academic program for which they are participating; or on the first day of a graduate assistantship for the first term for which they were admitted. Individuals participating in non-credit bearing programs or who attend class(es) on a non-credit basis, and individuals who attend class(es) at the University on a for credit-basis while still an elementary, middle, or high school student, or foreign equivalent, are not students for the purposes of this policy.
Third Party	An organization, entity, or individual that is legally distinct from the University.
University Premises	All buildings or properties that are owned, operated, managed, or legally controlled by Cornell University.
Volunteer	Uncompensated individuals who perform services directly related to the business of the University, to support the activities of the University, or to gain experience in certain endeavors.

III. ROLES AND RESPONSIBILITIES:

OFFICE:	ROLES AND RESPONSIBILITIES:
CYS	<p>Staffed by the Youth Protection Manager and Youth Program Administrator, who share the following responsibilities:</p> <ul style="list-style-type: none"> • First point of contact for policy interpretation and clarification. • Approves program structures. • Manages youth program registrations. • Monitors compliance with policy requirements. • Provides resources to programs affected by this policy. • Receives and reviews incident reports. • Provides consent and release forms. • Conducts program site visits. • Conducts annual policy review, in collaboration with an advisory committee of program directors, to ensure policy is still relevant, that it is reflective of current state, federal, and local laws and regulations, and whether changes are required to improve the effectiveness or clarify of the policy or procedures.
RMI	<ul style="list-style-type: none"> • Has primary oversight of CYS, Policy 8.8 and all related compliance materials.

	<ul style="list-style-type: none"> • Receives and reviews incident reports. • Reviews and amends contracts. • Has authority to take the necessary steps to protect minors in programs including, but not limited to, reviewing and amending contracts, prohibiting individuals from participating in programs based on background check results, and inspecting, curtailing, or even canceling programs. • Responsible for reporting incidents to the University’s insurance carriers.
CORNELL UNIVERSITY POLICE DEPARTMENT	<ul style="list-style-type: none"> • Responds to emergencies in youth programs which take place on-campus. • Receives reports of known or suspected abuse and maltreatment of minors. <ul style="list-style-type: none"> ○ Reports to external authorities as designated by state law. ○ Ensures all relevant offices are notified for Clery reporting, Title IX reporting, reporting to the University’s insurance carrier, etc.
OFFICE OF GENERAL COUNSEL	<ul style="list-style-type: none"> • Provides guidance on state and federal laws and regulations pertaining to minors.
HUMAN RESOURCES	<ul style="list-style-type: none"> • Responsible for processing background checks with the University’s third-party vendor for University employees in accordance with Policies 6.6.2 and 8.8.
TITLE IX	<ul style="list-style-type: none"> • Responsible for notifying CYS and RMI when a Title IX report is received involving a non-student minor. • Receives reports from CYS/RMI when incidents are reported involving a minor where the perpetrator is a student or employee of the University.
CAMPUS ACTIVITIES AND SORORITY & FRATERNITY LIFE	<ul style="list-style-type: none"> • In collaboration with CYS, responsible for making student organizations aware of Policy 8.8 and all related compliance materials. • Requires student organizations to send representatives to leadership workshops led by CYS focused on policy compliance, tracks training attendance. • Imposes consequences on student organizations who are out of compliance including, but not limited to, removing organizational funding or recognition.

YOUTH PROGRAM CHECKLIST FOR PROGRAM DIRECTORS:	
	<i>Student organizations only:</i> Meet with representatives from CYS to discuss program structure and compliance requirements prior to program registration.
	Register program in Ideal-Logic . Programs must be registered annually and at least 30 days before the program begins (see registration procedures in Appendix A).
	When applicable, reserve space for program in 25Live . <i>Please note that CYS is unable to approve 25Live requests until compliance with Policy 8.8 is met.</i>
	Determine if your program must be permitted as a children’s camp in New York state. Please note that if your program meets these guidelines, you must follow <i>both</i> sets of requirements. Tompkins County: any questions may be directed to Kate Walker at the Department of Health.
	Select authorized persons (program staff) to assist with your program; ensure those individuals understand the requirements of participating in a program for minors.
	Ensure all authorized persons have cleared their background check prior to the program commencement (see Appendix C).
	Ensure all authorized persons complete all required training prior to the program’s commencement (see Appendix D).
	Ensure all authorized persons complete all required paperwork prior to the program’s commencement. Please note that volunteer forms will be completed within the Ideal-Logic registration system and will be assigned automatically as required. Travel waivers will be completed within the Campus Groups platform.
	Ensure the program has enough authorized persons to meet the minimum supervision requirements for the duration of the program.
	Ensure the collection of completed parental consent and release forms. You may request those forms on the youthsafety.cornell.edu website or by clicking here .
	Ensure the collection of relevant information on program participants, including emergency contact information for parents/guardians, health and medical needs, dietary concerns, allergies, mobility concerns, behavioral needs, etc.
	Ensure abuse reporting procedures are followed by all authorized persons and comply with all internal and external investigations in the event of an abuse allegation.
	Ensure behavioral expectations are made known to participants and their parents/guardians (for programs with custodial care of minors).
	Ensure appropriate and expeditious action is taken for rule violations or other unacceptable behavior by both program participants and authorized adults.
	Create a program safety plan (template here).

	Establish check-in/check-out procedures (for programs with custodial care of minors – see Appendix B).
	Upload all applicable documentation to the Ideal-Logic registration system, including consent/release forms, safety plans, DoH permits, inspections, executed contracts, COIs, etc. (Please note that not all programs require all forms; contact CYS with any questions).
	Comply with CYS site visits during programming.

IV. POLICY COMPLIANCE & REGISTRATION:

DO I HAVE TO REGISTER MY YOUTH PROGRAM AND COMPLY WITH POLICY 8.8?	University Departments/Units	University Student Organizations (ITs)	Independent Student Organizations (EOs)	Third Parties
On University Premises	<u>YES</u>	<u>YES</u>	<u>YES</u>	<u>YES</u>
Off University Premises	<u>YES</u>	<u>YES</u>	<u>NO</u>	N/A

Events open to the public or to the Cornell Community which are not targeted toward minors:	<u>NO</u> Registration and compliance are not required – Event organizers may always contact CYS for operational assessments and recommendations.
Events where minors will be chaperoned by a parent/guardian, teacher, or other chaperone (i.e.: field trips):	<u>MAYBE</u> Contact CYS – Depending on the type of program registration and consent forms may be required, background checks and training may not be.

See Appendix A for full registration procedures.

V. SUPERVISION:

Appropriate supervision promotes safety, reduces the risk of one-on-one scenarios, facilitates emergency response, and minimizes opportunities for abuse, neglect, and misconduct.

Supervision means:

- Participants are within sight, except for infrequent momentary periods.
- Participants are within reasonable hearing distance of an authorized person who is trained to recognize inappropriate or dangerous activities or behavior and is aware of their obligation to report.
- There may be no lapses in supervision, even during breaks in scheduled activities.
- In no circumstances may minors be left to traverse campus independently while in Cornell’s custodial care.

The following supervision ratios, as recommended by the American Camp Association and required by the New York State Department of Health, must be met, or exceeded, for all in-person activities:

Participant Age Group	Number of residential (overnight) participants**	Number of non-residential participants**	Number of authorized persons*
5 and under	5	6	1
6-8 years	6	8	1
9-14 years	8	10	1
15-18 years	10	12	1

**At least one extra authorized person must be included to ensure adequate supervision in an emergency and to avoid 1:1 interaction with minor participants. Programs that have participants of all genders should make every effort to include authorized persons of all genders.*

***Lower ratios may be utilized for certain passive activities. Higher ratios may be required for swimming, boating, wilderness, and other high-risk activities, or if the program includes participants who have disabilities. Consult the CYS office for guidance.*

Authorized persons should have a clear understanding of their responsibilities regarding supervision of the participating minors. Supervision should be active and direct and authorized persons should practice scanning their environment for safety.

Older minors may not be included in ratios or supervise younger minors.

<i>These activities and locations have been shown to have a higher incidence of abuse and therefore require a higher level of diligence in monitoring and supervision:</i>	
<u>HIGH RISK ACTIVITIES:</u>	<ul style="list-style-type: none"> • Transportation • Overnights/residential programming • Field trips away from campus • Transitions between activities • Any situation where minors are changing clothes • Activities with mixed age groups
<u>HIGH RISK LOCATIONS:</u>	<ul style="list-style-type: none"> • Bathrooms and locker rooms • Out of the way locations • Stairwells • Unused rooms • Any program rooms that lack windows and are not visible to others

When minors are using a **bathroom** or **locker room**, authorized persons should supervise from the doorway; this allows the youth privacy while maintaining oversight. The number of minors allowed in the bathroom at one time should never exceed the number of stalls or fixtures. Utilize the rule of three for any participants who require assistance in these areas.

Programs with an **overnight** component must:

- Prohibit minors of different genders from sharing accommodations.
- Prohibit minors and adults sharing accommodations (unless it is a parent sharing space with their own child only).
- Prohibit minors of different genders from bathing, showering, or changing clothes in the same space; if separate facilities are not feasible, a schedule must be created allowing for separate usage times.
- Prohibit minors and adults from bathing, showering, or changing clothes in the same space; if separate facilities are not feasible, a schedule must be created allowing for separate usage times.
- Make reasonable attempts to house participants who are 17 and older separately from those who are 16 and under.
- Have scheduled curfews commensurate with the ages of the participants.
- Require at least two authorized persons be present for bed checks.
- Have a documented incident response procedure if a minor is not accounted for at curfew or bed check.
- Orient minor participants on where and how to locate authorized persons in the overnight hours.
- Orient minor participants in the facility’s emergency exit plans.

All activity with minors in Cornell programs must be observable and interruptible. *Private, one-on-one contact between authorized persons and minors should be minimized and may only occur when vital to the structure of the program and has been approved by RMI/CYS with written parental consent.*

VI. CONSENT:

Consent/release forms must be collected in the following situations:

- All programs with an overnight/residential component.
- Day programs in which the minor participant(s) will not be accompanied by a parent, legal guardian, or other chaperone.
- Programs where minor participant(s) will visit areas of the University that are not open to the public.
- Programs where minor participant(s) will be participating in hands-on activities in labs, shops, studios, or athletic facilities.

A media release must be collected before authorized persons may photograph, film, or record minors. Medical and transportation releases may be required commensurate with the type of program.

These forms are provided by CYS and the terms may not be altered. Consent forms may be requested on the front page of youthsafety.cornell.edu or by clicking [here](#).

VII. BEHAVIORAL STANDARDS FOR MINOR PARTICIPANTS:

Cornell University has a zero-tolerance policy for abuse, mistreatment, or sexual activity among minor participants in our programs. As such, youth programs that have custodial care of minors must develop and make available to participants and parents/guardians the rules and disciplinary measures applicable to the program. These measures must include a clear prohibition on peer-on-peer abuse and misconduct.

The following minimum conduct rules are required:

- The possession or use of alcohol and other drugs, fireworks, guns and other weapons, and sexually explicit material is prohibited.
- Participants may not leave University premises or the program location without consent.
- Participants are prohibited from engaging in acts of violence, sexual abuse, or harassment.
- [Hazing](#) is prohibited.
- Bullying, including verbal, physical, and cyber bullying are prohibited.

- The use of tobacco products, including e-cigarettes, is prohibited.
- Misuse, damage, or theft of property is prohibited.
- The use of cameras, imaging, and digital devices is prohibited in areas where privacy is expected, such as showers, locker rooms, and restrooms.

Rules for older program participants (generally 13 and above) should include a prohibition on all sexual activity in the program.

VIII. MECHANISMS FOR PARTICIPANT FEEDBACK:

Program participants and their families must be provided with multiple ways they can report safety concerns or boundary-crossing behavior. Appropriate language for this might be: *“If my child or I have concerns about anything that happens during this program, the program director can be reached at (phone number/email). If for any reason we are uncomfortable contacting the program director or that person is not available, Cornell University’s Youth Protection team can be reached at 607-255-9062 or am2987@cornell.edu.”* [This CYS webpage](#) with information for parents and guardians should also be provided. This information should be provided in the program’s registration documents or welcome packet.

IX. SAFETY PLAN:

Program directors operating programs with custodial care over minors must have a written safety plan for reasonably foreseeable emergencies that are specific to the location of the program, the nature of the program, and consider the age range of the participants. [Cornell’s Emergency Action Guide](#) is a good resource for developing these plans, however that plan is geared toward adult students and employees and not minors; the program’s safety plan must include plans to assist minors during an emergency and to provide appropriate supervision during emergencies, emergency communication plans, and a lost participant plan.

Any accidents, injuries, or illnesses that occur during the program must be reported to CYS. The incident report is located within the [registered program](#).

To be prepared in the event of an emergency, program directors and all authorized persons should:

- Ensure that they are set up to receive [CornellALERT](#) emergency notification messages.
- Download the [Rave Guardian app](#).
- Ensure the phone number for the security team appropriate to the program’s location is in their phone:
 - Ithaca: (607) 255-1111

- AgriTech: (315) 787-2215 (or call local authorities)

Off-campus programs should dial 911.

Program directors are responsible for ensuring that there is an efficient way to contact parents/guardians of all minor participants in the event of an emergency.

To ensure the physical health and safety of participants, CYS recommends having at least some authorized persons in each program certified in first aid and CPR/AED. View training options within Cornell University by clicking [here](#) The [American Red Cross](#) is another resource, or contact the local county Department of Health for other resources.

Note for programs that are considered children’s camps and permitted by the New York State Department of Health:

DoH permitted camp programs must:

- Use the DoH safety plan template instead of Cornell’s.
- Follow state requirements for first aid and CPR/AED training for authorized persons.
- Have a health director on staff.

More information from the New York State Department of Health can be found by clicking [here](#). Please direct any questions to CYS and/or the local health department.

A template for this safety plan may be found by clicking [here](#) or by visiting youthsafety.cornell.edu/book/preparing-emergencies.

X. CHECK-IN/CHECK-OUT PROCEDURES:

Program directors for programs that have custodial care over minors must develop a procedure for the transition of the custody of care. This procedure clarifies and documents when a child arrives at or departs from the program, ensures appropriate supervision of minors in the program, and makes it clear when the program is responsible for the supervision of the minors and when the parent/guardian is responsible for the supervision of the minors.

Parents/guardians must sign their children in and out each day (or the first and last day of the program for a residential program). Adults must show photo identification to pick up their child; once a relationship is established and the authorized persons responsible for overseeing sign-in and sign-out are familiar with the families, the photo requirement may be waived. Authorized persons are responsible for supervising minors until they are picked up by an adult with advanced written authorization to take custody of the youth.

CYS also suggests allowing parents/guardians the ability to list “do not pickup” names upon registration.

High school-aged youth may sign themselves in and out of programs with advance written consent from the parent/guardian.

Any questions may be directed to CYS. Exceptions to this provision will be considered on a case-by-case basis.

See Appendix B for a template.

XI. BACKGROUND CHECKS:

Policy 8.8 requires background checks for all authorized persons who have direct contact with minors participating in a youth program. Those who have incidental contact with minors are not required to complete a background check under this policy. This background check includes a criminal background check and sex offender registry search.,

No individual subject to background screening may begin interacting with minors until the background check has cleared. Under policy 8.8, students and volunteers must be screened annually; faculty and staff must be screened every three years. The requirements of this policy prevail over any less rigorous requirements in [Policy 6.6.2 Reference Checks, Information Verification, and Background Checks](#).

Third Parties operating programs on University premises are responsible for procuring and reviewing background checks that minimally meet the above requirements.

See Appendix C for the full procedures for procuring background checks.

XII. TRAINING:

Policy 8.8 requires that all authorized persons who have direct contact with minors in youth programs complete training in the recognition, prevention, response to, and reporting of abuse, and authorized persons are expected to understand and implement the material presented in this training. This training **must** be completed prior to the first day an authorized person conducts or participates in a program with minors, and training must be refreshed annually.

Those who have incidental contact with minors are not required to complete this training but are, nevertheless, encouraged to do so.

Alternative approved training may be offered in a group setting or be approved on a case-by-case basis by CYS.

Third parties may provide their own training or utilize Cornell University’s training. Contact CYS for more information.

See Appendix D for the process for obtaining this training.

XIII. STANDARDS OF BEHAVIOR FOR AUTHORIZED PERSONS:

All authorized persons should serve as positive role models for youth and act in a caring, honest, respectful, safe, and responsible manner that is consistent with the [mission](#) and [guiding principles](#) of the University. The behavior of all authorized persons is expected to align at all times with the University’s Codes of Conduct ([1,2](#)) and the Standards of Behavior for working with youth. These behavioral standards help promote the safety and wellbeing of minor participants. Authorized persons must attest annually that they have read, understand, and will abide by these standards, which are assigned automatically to authorized persons when they are listed in a registered program in Ideal-Logic.

Third parties are responsible for disseminating these behavioral standards to all program staff.

See appendix E for the full set of behavioral standards.

XIV. REPORTING:

Cornell University has a zero-tolerance policy for abuse. As such, it is imperative that the entire Cornell community participate in the protection of minors and be alert to the safety of youth. Policy 8.8 requires the reporting of:

- Abuse
- Maltreatment
- Child Molestation
- Sexual Misconduct
- Inappropriate or suspicious behaviors that may not rise to the level of abuse (also known as red flag behaviors)
- Peer-to-Peer Abuse or Sexual Misconduct

Follow these steps to fulfill your reporting obligations:

1. Dial 911 whenever a minor is in imminent danger.
2. Contact the authorities as follows:

On-Campus: Authorized persons must contact the appropriate safety and security team for their campus:

- Ithaca Campus: (607) 255-1111
- Geneva Campus: (315) 828-6771 (or dial 911)

Off-Campus: For outreach activities occurring off-campus, do not call CUPD. Notify the community partner overseeing the activity and the Cornell advisor or program director (where appropriate) to determine collaboratively if a call must be made to the State Central Register of Child Abuse and/or law enforcement, and which party will make the call. Consult with the Youth Protection Manager as needed.

3. Contact CYS. An incident report must be completed within the [Ideal-Logic registration system](#) as soon as is practicable.
4. [NYS Mandated Reporters](#) are required to report to Cornell in addition to fulfilling their state-mandated reporting obligations.

Please contact CYS whenever guidance or support is needed.

Third parties are responsible for disseminating these reporting guidelines to all program staff.

See Appendix F for the signs and symptoms of abuse and maltreatment.

XV. Incident Response

All reports of suspected abuse, maltreatment, red flag behaviors, and peer-on-peer sexual activity and abuse will be taken seriously. An investigation will be conducted by a skilled and impartial investigator. Authorized persons must cooperate with any internal or external investigations.

Investigations may lead to a variety of outcomes:

For Authorized Persons:	For Youth Participants:
<ul style="list-style-type: none"> • Documentation • Increased supervision • Coaching/counseling • Retraining • Reassignment • Removal from the program • Referral to law enforcement 	<ul style="list-style-type: none"> • Documentation • Parent/guardian communication • Creation of a safety plan • Increased supervision • Suspension • Expulsion

If a Minor Discloses Abuse or Maltreatment to you:	
<ul style="list-style-type: none"> • Do listen. • Do be sensitive to vague disclosures and report what you can. • Do tell the youth that they were right to disclose. • Do assure the youth that the abuse was not their fault. • Do reassure the youth that they will be supported. • Do write down exactly what was said and as many details as the youth discloses. • Do follow reporting procedures. 	<ul style="list-style-type: none"> • Do not promise the youth that you will keep their disclosure a secret. • Do not express shock, outrage, or disbelief. • Do not threaten or condemn the perpetrator. • Do not ask questions that could make the youth feel responsible for the abuse.

XVI. Third Party Requirements

Third parties who operate programs for minors on University premises are subject to the above policies and procedures. Third parties must:

1. Have a Cornell University sponsor and register with CYS (see Appendix A for registration procedures).
2. Have an executed agreement that includes compliance with this policy as a material term of the contract. This contract must be uploaded to the registered program.
3. Maintain insurance, without interruption, that includes sexual abuse and molestation coverage, according to the limits promulgated by [RMI](#). Cornell University must be named as an additional insured on these policies. Once approved, this certificate of insurance must be uploaded to the registered program.
4. Third party program directors must sign an attestation in the Ideal-Logic registration system that:
 - a. All authorized persons have cleared a background check.
 - b. All authorized persons have received training in the recognition, prevention, response to, and reporting of abuse.
 - c. All authorized persons have been provided a copy of [Policy 8.8](#), a copy of Cornell University's Standards of Behavior (printable copy [here](#)), and Cornell University's reporting requirements (printable copy [here](#)).
 - d. Cornell University's supervision requirements will be met.

APPENDIX A: REGISTRATION PROCEDURES

Program directors are required by policy 8.8 to register their youth program with CYS prior to working with minors at Cornell University.

- **Program registration must be completed *at least 30 days* prior to the start of the program. This allows for sufficient time for program review and approval and for the completion of background checks.**
- **Continuing programs must re-register annually to ensure ongoing compliance.**
- **Student organizations who run youth programs must have at least one officer meet with representatives from CYS *prior* to program registration.**

Cornell University users follow these steps:

1. Register your program with CYS in the Ideal-Logic system [here](#).
2. Select the top box that says “Cornell SSO Login.”
3. Click on “Youth Program Registration Form.”
4. Select the college or unit that is sponsoring the program.
5. Complete requested information on the program name, date(s) and times.
6. This is **not** a third party program.
7. Provide a detailed description of the program and the program’s URL if applicable.
8. Answer whether or not this is a Cooperative Extension Program.
9. Answer whether or not this is a student organization program; if yes, provide the advisor’s name and contact information.
10. The next three questions help determine if the program has direct or incidental contact with minors and the system will assign compliance requirements accordingly.
11. Answer the remaining questions about the program’s medium, whether there is an overnight component, exact program locations, whether the minor(s) will be in a lab, and whether or not a New York State DoH permit is required.
12. Enter the estimated number of program participants in each age range; this will provide you with the minimum number of authorized persons you need to run your program.
13. Add the program director. Note that this person will automatically be added as the program contact and as an authorized person. If that is not accurate, you will need to manually change it. *The program contact’s phone number should be the one they can be reached at during the program.* More than one individual can be listed in this section when appropriate.
14. Add the authorized persons for the program. Please note that you can upload a spreadsheet of all individuals by clicking on the orange box that says “Upload Authorized Persons.” You will easily be able to see who is already compliant with the policy requirements as you add individuals – a red X indicates non-compliance and a green check mark indicates compliance.
15. Hit next.
16. Review all of your information. Hit the green box that says “Submit Program.” This sends your program over to CYS staff to review.

17. Once CYS reviews the program and approves it to move forward, authorized persons will receive emails outlining their background check, training, and volunteer agreement requirements (where applicable) if they have not already done so for another program.
18. You will be able to monitor compliance within the registered program; when authorized persons have cleared background checks or completed other requirements, they will receive a green check mark that says "Compliant." A red X that says "Not Compliant" indicates that the authorized person has not yet completed that requirement.

Third party (including Cornell University LLC Coaches) users follow these steps:

1. Register your program with CYS in the Ideal-Logic system [here](#).
2. Select the bottom box that says "Non-SSO Login."
3. Click on "Youth Program Registration Form."
4. Select the college or unit that is sponsoring the program.
5. Complete requested information on the program name, date(s) and times.
6. This is a third party program.
7. Provide a detailed description of the program and the program's URL if applicable.
8. Answer the remaining questions about the program's medium, whether there is an overnight component, exact program locations, whether the minor(s) will be in a lab, and whether or not a New York State Department of Health permit is required.
9. You will be prompted to upload the signed contract, certificate of insurance (COI), and hold harmless forms. If you do not have these documents available at the time of registration, they may be uploaded to the system later, but must be uploaded before the program begins.
10. Answer whether or not your program is a New York State permitted camp program. If yes, you will be prompted to upload the permit and inspection report. If you do not have these documents available at the time of registration, they may be uploaded to the system later, but must be uploaded before the program begins.
11. You must attest that you have procured and reviewed background checks for all authorized persons that meet or exceed Cornell University's requirements.
12. You must attest that all authorized persons have completed training in abuse prevention and reporting and behavioral standards for working with youth that meet or exceed Cornell University's requirements.
13. Enter the estimated number of program participants in each age range; this will provide you with the minimum number of authorized persons you need to run your program.
14. Add the program director. Note that this person will automatically be added as the program contact and as an authorized person. If that is not accurate, you will need to manually change it. The program contact's phone number should be the one they can be reached at during the program. More than one individual can be listed in this section when appropriate.
15. Hit next.
16. Review all of your information.
17. Hit the green box that says "Submit Program." This sends your program over to CYS staff for review.

Depending on the type of program, you may be prompted to upload some additional documentation:

- Third parties will be prompted to upload signed contracts, certificates of insurance, and signed hold harmless waivers.
- NYS permitted camps will be prompted to upload the DoH-issued permit and inspection report.
- Consent/release forms where required.
- Safety plans where required.

COMPLIANCE

Program directors are responsible for ensuring all authorized persons are compliant with all of the requirements of policy 8.8. At no time may non-compliant individuals have direct contact with minors in Cornell-affiliated programs.

APPENDIX C: SIGN-IN/SIGN-OUT TEMPLATE

Participant Name:	Sign-In Date:	Sign-In Time:	Sign-Out Date:	Sign-Out Time:	Parent/Guardian Signature:	Verification Completed By:

APPENDIX D: BACKGROUND CHECK PROCEDURES

Policy 8.8 requires that all individuals who have direct contact with minors clear a background check and sex offender registry search prior to participating in the youth program.

Students & Volunteers:

Background checks will be completed by CYS via Sterling, a third-party vendor. The background check goes back 7 years or until the recipient was 18, whichever is more recent.

Background checks are initiated automatically when the student or volunteer is attached to an upcoming youth program in the Ideal-Logic [registration system](#). Sterling will email the student or volunteer directly with instructions for completing the background check. If the email is not found and a new one is required, contact youthprogramadministrator@cornell.edu.

Program directors: you will know that the background check has cleared when the individual shows a green check mark that says "Compliant" rather than a red X that says "Not Compliant."

The Ideal-Logic system will automatically initiate background checks for any individuals who are set to expire during a youth program they are actively participating in.

Students and volunteers must clear a background check annually while having direct contact with minors in youth programs.

University Employees:

Background checks for employees will be conducted by Human Resources.

If the Ideal-Logic [registration system](#) does not have a record of the employee's background check, the system will send an email to the employee prompting them to reach out to their HR representative and request a criminal background check and sex offender registry search so that they may participate in a youth program. The clearance date of this background check must be provided to youthprogramadministrator@cornell.edu. Once the date has been entered into the system, the employee will show a green check mark that says "Compliant."

The Ideal-Logic system will automatically generate an email to any employees whose background check is set to expire while they are participating in a youth program. This email will prompt the employee to reach out to their HR representative to procure an updated background check.

University employees must clear a background check every three years to work directly with minors.

Third Parties:

Criminal background checks and sex offender searches must be completed for all individuals who will have direct contact with minors under the age of 18. These results do not need to be shared with Cornell University, but the program director will attest within the program registration that this has been completed.

Compliance:

Program directors are responsible for ensuring all authorized persons are compliant with all of the requirements of policy 8.8, including background check clearance. At no time may non-compliant individuals have direct contact with minors in Cornell-affiliated programs.

Additional Information for Children’s Camps:

For children’s camps (as defined by New York State), the state and county Department of Health may enforce additional requirements for background checks in addition to the above under the Public Health Law. Please visit health.ny.gov for more information. Both sets of requirements must be met for camp staff as privacy laws prevent background check results from being shared.

Adverse Information:

A small, specialized committee will review any findings in background check results to determine that individual’s eligibility to work with minors. Adverse information in a background check does not automatically preclude individuals from working with youth in a Cornell program. The nature and gravity of the offense, the time that has passed since the offense, the circumstances surrounding the offense, the age at the time of conviction, rehabilitation efforts, and character references will be taken into consideration.

Confidentiality:

All background check-related materials are considered confidential and will be shared only with those with a business need to know. Background check-related materials are never stored within academic records.

APPENDIX E: TRAINING PROCEDURES

Training for Authorized Persons:

All faculty, staff, students, and volunteers participating in a program with minors are required by policy 8.8 to complete training in the recognition, prevention, response to, and reporting of abuse prior to participating in a youth program. There are three components to this training:

Watch:	<i>Protecting Children: Identifying and Reporting Sexual Misconduct</i>
Watch:	<i>Boundary Training for Educators</i>
Read and Attest:	<i>The Standards of Behavior for Working with Youth</i>

Training Assignment: These training components are automatically assigned to all authorized persons when they are added to a youth program [registration](#) and must be completed at least once annually. Individuals will receive email notification when they have outstanding requirements to complete and will receive periodic reminders until they are within compliance.

Compliance: Individuals are marked as compliant in the Ideal-Logic system once they have watched both videos and signed an attestation that they understand and will abide by the Standards of Behavior. This compliance is tracked across programs; individuals will not be assigned these trainings more than once within a calendar year.

Training for Program Directors:

CYS strongly recommends that program directors additionally complete the *Protecting Children: Hiring Staff Who Work with Minors* training prior to commencement of youth programming. This training is available within the Ideal-Logic registration system by clicking on the box marked “Self-Administer Trainings.”

Additional Training:

It is the responsibility of the program director to train authorized persons in programmatic expectations; supervision requirements; policies, procedures, and enforcement; appropriate crisis/emergency response; safety and security precautions; appropriate handling of medical emergencies; the health, medical, and behavioral needs of participants; and confidentiality issues involving minors. Contact CYS if additional resources are needed.

Compliance:

It is the responsibility of the program director to ensure that all authorized persons are compliant with this training requirement prior to participating in a program with minors. In the Ideal-Logic registration system, a green check mark indicates compliance, and a red X indicates non-compliance. **No authorized person may participate in a youth program while out of compliance with the requirements of policy 8.8.**

Third Parties:

Third parties may utilize their own training provided it meets the above requirements. If you would like to utilize Cornell’s training, please contact youthprogramadministrator@cornell.edu.

APPENDIX F: STANDARDS OF BEHAVIOR

Boundaries: Be aware of the unique vulnerability of minors and be particularly aware of maintaining appropriate physical, emotional, and sexual boundaries in such interactions. Do not engage in abusive conduct such as hitting, kicking, slapping, shaking, or restraining. Physical contact should only occur when non-sexual and otherwise appropriate and never in private. (Please see next page for more guidance on appropriate and inappropriate verbal and physical interactions with minors). Do not engage in any sexual activity, sexually explicit conversations, or share sexually explicit material with minors. Do not make sexual comments or jokes in the presence of a minor or talk about things of a romantic nature with a minor. Avoid the use of profanity with minors. Do not dress provocatively or inappropriately in the presence of minors.

Discipline: Do not physically discipline a minor. Corporal punishment is prohibited. Do not use speech, gestures, or other behaviors that are bullying, demeaning, belittling, hurtful, or meant to embarrass.

One-on-One Interactions: All interactions must be observable and interruptible and held within a well illuminated area. If that is not appropriate or possible, then the door to the room must be left open, or a window that allows for unobstructed observation should be present. All activities involving minors must adhere to the 'rule of three,' meaning that reasonable efforts have been made to have two or more adults present during activities where single minors are present. Do not meet with minors outside of established program times.

Drugs, Alcohol, and Other Prohibited Items: Do not use, possess, or be under the influence of alcohol or illegal or mind-altering drugs while in the presence of minors. Do not use any weapon, explosive device, or sexual materials in any form in the presence of minors. Do not make any of the above items available to minors.

Gift Giving: Do not give a minor or their family gifts or special attention or engage in any behaviors that encourage keeping secrets from a parent/guardian.

Photography: Do not take or use a photo or video of a minor or post information about minors to social media sites unless the parent/guardian has signed a media release, *and* the photo/video is being used for program related purposes.

Electronic Communication: Do not have personal, non-programmatic electronic communication with minors, including via email, text, social networking sites, cloud-based gaming sites, or any other form of electronic communication. Except in an emergency, all electronic communication must be open and transparent (adhering to the rule of three).

Restrooms/Locker Rooms/Changing Areas: Do not spend time alone with minors in these areas. Two adults should be assigned to monitor the bathrooms of their gender whenever possible. Do not change clothes in front of a minor.

Overnights: Do not share accommodations with a minor. At least two adults must be present for room checks. Separate bathrooms, locker rooms, and showers must be used by minors (or be used at separate times).

Transportation: Do not transport minors alone in any vehicle except in an emergency. Personal vehicles should never be used to transport minors.

<p style="text-align: center;">Appropriate Physical Interactions (with consent):</p>	<p style="text-align: center;">Inappropriate Physical Interactions:</p>
<ul style="list-style-type: none"> ○ Hugging from the side ○ Patting on the shoulder or upper back ○ Shaking hands ○ High fives/fist bumps ○ Holding hands (with young children in an escorting situation) ○ Other brief contact intended to comfort distressed children below the age of 12, so long as another adult is witnessing it ○ Teaching a physical technique that requires hands-on instruction such as finger placement on a musical instrument or positioning for an athletic activity, so long as it is conducted either in the open or in an interior space (1) with the doors and windows open or (2) in a building open to the public at the time of the touching ○ Any contact aiding an injured minor or a minor in imminent danger of physical harm (such as a struggling swimmer) ○ Separating minors involved in an altercation 	<ul style="list-style-type: none"> ○ Striking, hitting, using corporal punishment, or any other punishment involving physical pain or discomfort ○ Hugging with full body contact ○ Kissing ○ Sitting on someone’s lap (for those above preschool age) ○ Wrestling ○ Carrying a minor/piggyback ride ○ Tickling ○ Massages or rubs ○ Touching on the bottom, waist, chest, or genital area (unless changing diapers) ○ Any physical expressions of affection ○ Sexual contact of any kind ○ Staring at a minor’s body ○ Any intended affection unwanted by the minor
<p style="text-align: center;">Appropriate Verbal Interactions:</p>	<p style="text-align: center;">Inappropriate Verbal Interactions:</p>
<ul style="list-style-type: none"> ○ Praise (e.g.: “Well done! or “Keep up the good work!”) ○ Encouragement (e.g.: “You can do it!”) ○ Positive reinforcement ○ Asking broad questions about a minor’s day or weekend ○ Using language that is supportive and positive ○ Age-appropriate conversations ○ Appropriate jokes 	<ul style="list-style-type: none"> ○ Calling someone names ○ Adults discussing personal relationships or relationship problems with a minor ○ Asking a minor to keep a secret ○ Cursing ○ Discriminatory or sexual jokes ○ Shaming or belittling someone ○ Harsh language that may frighten, threaten, or humiliate ○ Negative remarks about a minor or their family ○ Commenting on or complimenting a person’s body or body development ○ Showing special attention to one child
<p style="text-align: center;"><i>Noncompliance with these standards of behavior may result in discipline up to and including removal from the program or termination and may also be a violation of New York State Law.</i></p>	

APPENDIX G: Signs and Symptoms of Abuse and Maltreatment

Abuse means serious harm committed to children. Abuse can be physical, emotional, or sexual. Abuse also includes situations where a parent or other person legally responsible knowingly allows someone else to inflict such harm on a child.

Maltreatment, which includes neglect, is when a child intentionally or unintentionally receives an inadequate quality of care in the areas of food, clothing, shelter, education, medical care, or supervision. It also includes excessive corporal punishment, abandonment, or misusing alcohol or other drugs to the degree that the child was placed in danger. ***It is important to note that poverty or other financial inability to provide the above is not considered maltreatment.***

View the chart on the next page to see possible indicators of physical abuse, sexual abuse, maltreatment, and other concerns that **must** be reported, even in the absence of other signs of abuse.

Possible Indicators of Physical Abuse:

- Injuries to the eyes or both sides of the head or body (accidental injuries are typically to one side only).
- Frequent injuries (bruises, cuts, and/or burns), especially if the child cannot explain the cause or the explanation does not make sense. Sometimes these injuries may appear in distinctive patterns, such as finger- or handprints, human bite marks, cigarette burns, or impressions of other instruments.
- Destructive, aggressive, or disruptive behavior.
- Passive, withdrawn, or emotionless behavior.
- Fears of going home.
- Fears of parents or other specific adults.

Possible Indicators of Sexual Abuse:

- Symptoms of sexually transmitted diseases.
- Injury to the genital area.
- Difficulty and/or pain when sitting or walking.
- Sexually suggestive, inappropriate, or promiscuous behavior or language.
- Expressing age-inappropriate knowledge of sexual relations.
- Sexual victimization of other children.

Possible Indicators of Maltreatment:

- Obvious malnourishment, listlessness, or fatigue.
- Stealing or begging for food.
- Lack of personal care – poor hygiene, torn and/or dirty clothing.
- Untreated need for glasses, dental care, or other medical attention (not due to poverty).
- Frequent absence from or tardiness to school.
- Child inappropriately left unattended or without supervision.

Remember to Report Violations of the Standards of Behavior (Even in the Absence of Other Signs of Abuse), Including:

- Physical boundary violations such as tickling or wrestling.
- Any form of unwanted affection.
- Speech, gestures, or other behaviors that are demeaning, belittling, hurtful, or meant to embarrass.
- Inappropriate levels of supervision, including 1:1 interaction between adults and minors.
- Unauthorized photo/video of a minor.
- Sexual comments or jokes in front of a minor.
- Sharing sexually explicit material, alcohol, or other drugs with a minor.

APPENDIX G: Virtual Program Safety

All policies for in-person programs remain the same for virtual or hybrid programs, including registration, background checks, training, supervision, and reporting requirements. Please read the below guidance for additional procedural considerations to host virtual programs for youth safely.

- Authorized persons must always use their Cornell credentials and are prohibited from sharing personal email addresses, phone numbers, or social media handles.
- At least two authorized persons must be online during live sessions. If it is not possible for two adults to be present, a supervisor must have the link and be able to drop into the call at any time.
- Access to the online program must be set so that an authorized person must accept each participant into the meeting location to avoid unwanted guests in the program. Consider showing only the first name of each participant.
- Private messaging options must be turned off on participant accounts – messages and posts must be viewable by all participants.
- If you utilize breakout rooms, an authorized person must be assigned to monitor each separate room.
- Parents/guardians should be provided with access information for all virtual meetings and programs and should be able to see the program content and interactions.
- Limit access to participation by password, invitation, and/or authentication, and have policies in place to discourage sharing this information.
- Provide guidance to the youth participants prior to the commencement of the program on behavioral expectations and confidentiality issues.
- All authorized persons should be prepared to close the session in the event of inappropriate participant or adult behavior or “Zoom-bombing.”
- Authorized persons and program participants should sit in front of a blank wall or use a virtual background.
- Recording online sessions is strongly discouraged unless it is being used for training purposes. If you wish to record the session, parent/guardian consent must be obtained. Any recordings must be saved to the cloud and not to any personal computer or device.
- Minors may not engage in activities involving hazardous materials or work with any mechanical tools during an online program.

Please view [this page](#) and [this page](#) for more resources specific to utilizing Zoom securely with minors.