Youth Protection Policy (UW-1045) **Reference Guide** 2024

University of Wisconsin-Madison Office of Youth Protection 21 N. Park Street, 7th Floor Madison, WI 53715 youthprotection@wisc.edu



UW-Madison's Youth Protection Policy Contains a Multifaceted Youth Protection Framework

This guide will help you navigate each section of the policy's youth protection framework,* which is designed to protect:

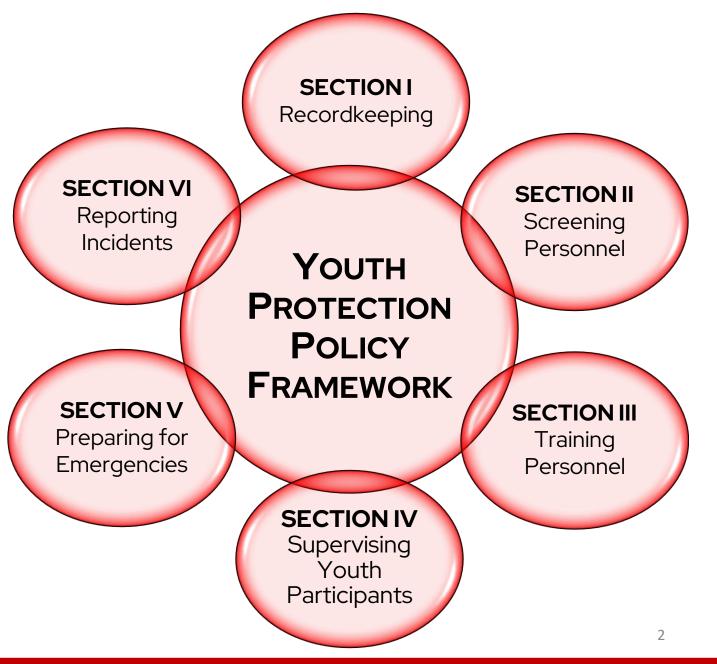
- youth who participate in youth activities,
- university employees and volunteers, and
- UW-Madison as an institution.

Information in this guide reflects the latest version of UW-1045 Youth Protection Policy. Email youthprotection@wisc.edu with questions.

*While the framework is standard throughout the university, administrative processes may vary in the university's largest youth-serving programs, including Athletics and Wisconsin 4-H.







SECTION I: Recordkeeping

All YOUTH ACTIVITIES Must Be Registered with the Office of Youth Protection Annually

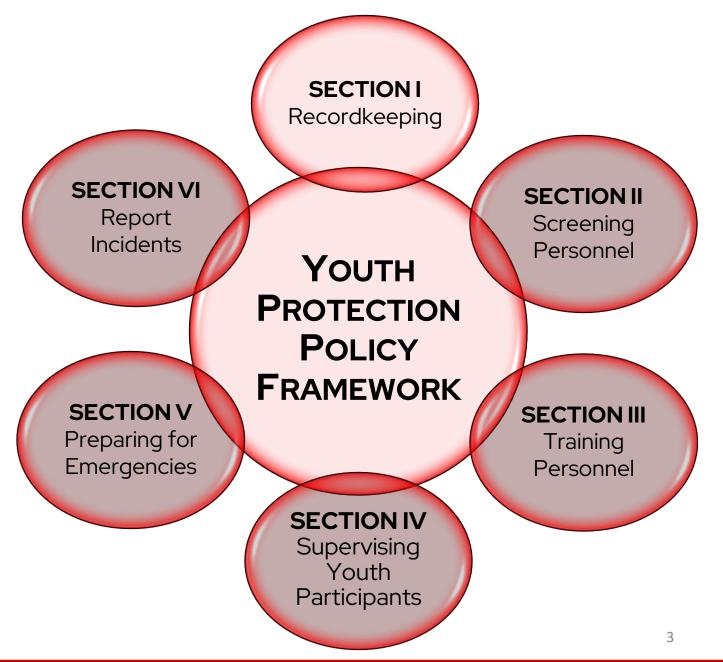
Youth Activity: An event, operation, endeavor, or activity intended for participation by minors that is operated by UW-Madison on or off campus.(UW-1045, Definitions).

Examples: programs, events, camps, clinics, workshops, symposia, conferences, tournaments, meets, clubs, projects, competitions, Olympiad, internships, job shadowing, mentoring, lessons, coaching, tutoring, field trips, lab visits, and servicelearning placements.

To register, visit https://youthprotection.wisc.edu/registration/. See pages 4-8 for more information on registering Youth Activities.



Youth Protection Policy, UW-1045

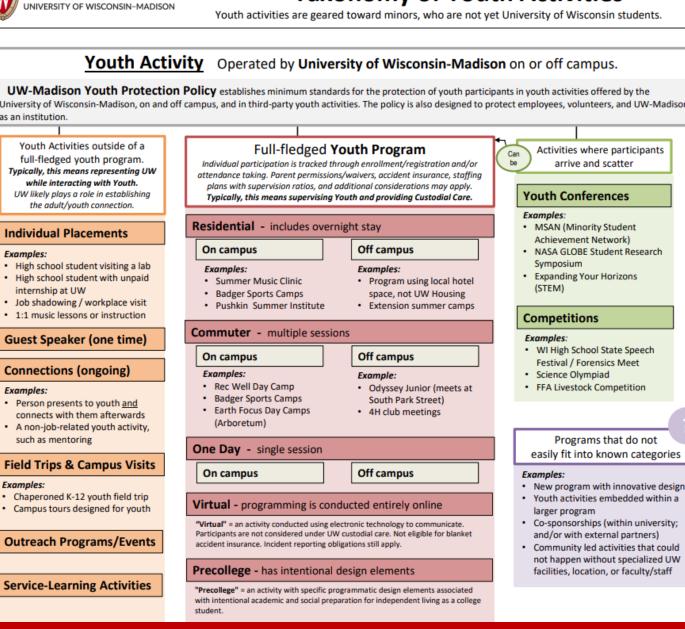


SECTION I: Recordkeeping

Office of Youth Protection

TIP FROM OYP:

All activities involving minors must register with the Office of Youth Protection **UNLESS** the activity is listed in the Blue Box



Taxonomy of Youth Activities

Youth activities are geared toward minors, who are not yet University of Wisconsin students.

Youth Activity Operated by University of Wisconsin-Madison on or off campus.

UW-Madison Youth Protection Policy establishes minimum standards for the protection of youth participants in youth activities offered by the University of Wisconsin-Madison, on and off campus, and in third-party youth activities. The policy is also designed to protect employees, volunteers, and UW-Madison as an institution.

FINAL 1/11/2024

Minor: A person under the age of 18.

Definitions

- Youth Participant: Individuals who are registered, enrolled, or engaging in a youth activity as participants.
- Youth Activity: An event, operation, endeavor, or activity intended for participation by minors that is operated by UW-Madison on or off campus.

Third Parties

(A non-university organization or entity.)

- Third Parties can conduct youth activities with authorization from a school/college/division youth protection designee.
- Campus facility use agreements must include the youth protection contract addendum when a third party hosts a youth activity that falls within the scope of the youth protection policy.

Exclusions: Not a Youth Activity

although Minors may be present

Activities Outside Scope of Youth Protection Policy Although minors may be in attendance,

these activities are not required to register annually with OYP.

Paid hourly employment of an individual under age 18 (when hired in roles that are not associated with a youth activity or third-party youth activity).

2 Enrollment in for-credit university course by an individual under the age of 18.

Orientation and academic advising activities for matriculated students under the age of 18 (e.g., SOAR).

- Events or activities open to and serving the general public (e.g., Badger Δ volleyball game).
- 5 State licensed preschool, childcare, day camp and daycare programs.
- Medical care given to minors in a university patient care setting by a licensed health care provider.
- Research conducted under protocols approved by UW-Madison
- Institutional Review Board. Note: supplemental procedures may constitute a youth activity (e.g., transportation or supervision of youth research participants if unaccompanied by a parent/guardian).
- Activities under UW-5039 Children in the Workplace (e.g., an employee bringing their child or children to visit the campus).
- Minors participating in pre-enrollment visitation or recruiting activities
- governed under the National Collegiate Athletic Association (NCAA).
- 10 Private events.



SECTION I: Recordkeeping Frequently Asked Questions

Do I need to register my activity? Check the <u>Taxonomy of Youth Activities</u> on page 4. Unless specifically excluded in the blue box, you should register it with the Office of Youth Protection. Still not sure? Email questions to <u>youthprotection@wisc.edu</u>.

How do I register? Visit the Office of Youth Protection website at https://youthprotection.wisc.edu/registration/ to be directed to the registration page. Registration is conducted through a Qualtrics form.

When should I register? At least 30 days before the start of the youth activity. It is recommended that youth activities with overnight components or high-risk features register 60-90 days in advance.

How do I prepare to register?

- Designate an Authorized Custodian for the youth activity: This person must be a UW-Madison employee.
- **Get permission from the Authorizing school/college/division:** Authorization must be in writing from the Youth Protection Designee (see page 6 for more information). You will need to provide documentation to OYP in a shared Google Drive.
- Identify the timeframe for the youth activity: Activities with multiple sessions or an ongoing program can be registered in a single entry. Multiple activities offered by the same program are typically registered separately.

What else do I need to provide the Office of Youth Protection?

For most activities, you need to provide additional information, including the staff roster, to the Office of Youth Protection. Participant rosters are required for all youth activities offered by UW-Madison that take custodial care of youth. See page 8 for more information.

Do I need to register each year? Yes.

TIP FROM OYP: If you offer youth activities each year, consider putting an annual registration reminder on your calendar.



Thank you for connecting with Office of Youth Protection. Please complete this form to register your youth activity planned for 2024.

Program or Activity Name

Association

- O UW-Madison
- UW-Madison Affiliate (e.g., WARF, Morgridge Center, Discovery Institute, Wisconsin Foundation)
- Third Party (No Affiliation with UW-Madison)

Authorizing Unit: The university's school/college/division authorizing the operation of this youth activity.

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Authorized Custodian

Must be UW-Madison faculty or staff. Cannot be a student. This person will be the primary contact for OYP compliance activities.

This person is responsible for the logistics of the youth program/activity, and ensures compliance with applicable policy and laws.

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hone	
ob Title	

SECTION I: Recordkeeping See Section I.B.1.

Permission from a YOUTH PROTECTION DESIGNEE is needed for all Youth Activities

YOUTH PROTECTION DESIGNEE:

The Youth Protection Designee is a UW-Madison employee designated by the dean or chief executive of the authorizing unit who is responsible for authorizing youth activities and third-party youth activities operating through, or otherwise associated with, that school/college/division. (UW-1045, Definitions).

AUTHORIZING UNIT:

The university's school/college/division responsible for authorizing the operation of individual youth activities and thirdparty youth activities. (UW-1045, Definitions).

What does the youth activity need from the Youth Protection Designee?

Written documentation of approval. It can be an email, letter, or a form developed by your school/college/division. Upload this document into your Simple Safe Zone (SSZ) secured shared Google Drive.

Who is the Youth Protection Designee for my school/college/division?

The Dean/Director of each school/college/division has been asked to identify the name of the staff member who has authority to approve activities involving youth in the school/college/division. A list of <u>Youth Protection Designees</u> is available in the Youth Activities Shared Google Drive.

Do third-party youth activities require permission from a Youth Protection Designee?

Yes. All Youth Activities need permission to operate on or through UW-Madison campus and on all university property. Third-parties must obtain authorization from a school/college/division and their Youth Protection Designee.

SECTION I: Recordkeeping

What Happens After the Registration is Complete?

If you have questions about the registration or any youth protection requirements at UW-Madison, please email youthprotection@wisc.edu.



Message you will receive when you submit the registration form:



Thank you for registering a Youth Activity with the Office of Youth Protection at the University of Wisconsin-Madison! UW-Madison's Youth Protection Policy (UW-1045) outlines requirements for running youth activities, including important information about screening and training staff. You can read the updated policy at https://policy.wisc.edu/library/UW-1045.

You will be contacted by staff from the Office of Youth Protection if your activity is required to post rosters to Simple Safe Zone. More information about Simple Safe Zone can be found on the Office of Youth Protection website at https://youthprotection.wisc.edu/registration.

If you have questions about this registration or any youth protection requirements at UW-Madison, please email youthprotection@wisc.edu.

SECTION I: Recordkeeping

See Section I.B.3. i-v, Section I.C. 1-3

Data Collection: Rosters in Simple Safe Zone (SSZ)

WISCONSIN-MADISON

Roster Upload Requirements

ALL Youth Activities

14 Days Prior to Start

Upload the following details regarding all adults authorized to interact with youth participants:

- Name
- Contact information (e.g., email, NetID)
- Role classification (e.g., authorized custodian, authorized assistant custodian, authorized adult, guest speaker)
- Dates of successful completion of all applicable screening requirements
- Dates of completion of all applicable training requirements

ONLY Youth Activities Providing Custodial Care

14 Days Following Conclusion

Upload the following details for all youth participants who attended the youth activity:

- Name
- Contact information for parent(s)/guardian(s)
- Name and contact information for emergency contacts

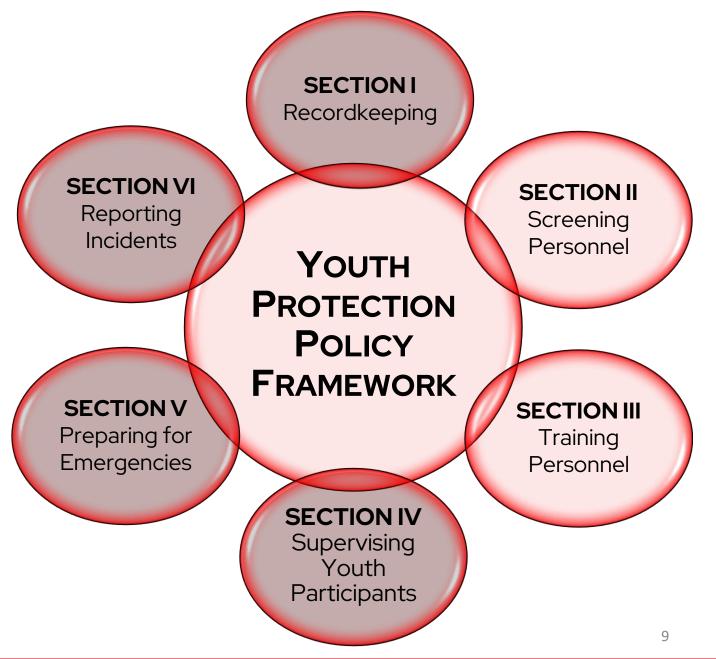
SECTIONS II and III: Screening and Training Personnel

Screening and Training Requirements Vary by Role

In this section, you will learn about the four roles in Youth Activities and the screening and training requirements for each role.







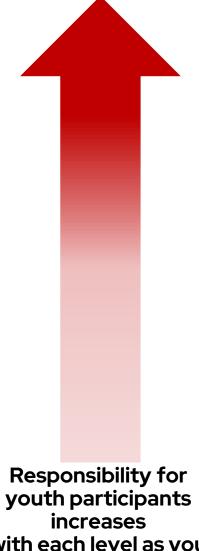
Four Youth Activity Roles

SECTIONS II and III: Screening and Training Personnel

ROLE TYPE

EXAMPLES

Authorized Custodian The adult responsible for the operation of a youth activity or third-party youth activity and compliance with this policy. Authorized custodians are authorized to provide custodial care following completion of screening and training requirements; can be included in ratios.	 A director running the PEOPLE program The head of sailing programs with UW Outdoor A professor who is organizing and managing a one- day science bowl An employee responsible for coordinating school group tours of the Kohl Center
Authorized Assistant Custodian An adult working or volunteering in a youth activity or third-party youth activity who has been authorized to provide custodial care following completion of screening and training requirements; can be included in ratios.	 Volunteers supervising youth in an afterschool STEM program Staff responsible for supervising youth in an overnight camp
Authorized Adult An adult working or volunteering in a youth activity or third-party youth activity who has been authorized to interact with youth participants following completion of screening and training requirements but is not authorized to provide custodial care; <u>cannot</u> be included in ratios.	 Tour guide in museum giving tours to youth Outreach educator who brings programs to local schools or community groups, but is not responsible for the supervision of the youth Professor who teaches physics weekly in a summer precollege program on campus
Guest Speaker An individual who is invited to make a presentation, conduct a demonstration, or facilitate instruction during a youth activity for a limited and defined time (such as a one-time-only basis or a scheduled presentation series), is never left alone with youth participants, and does not share personal contact information; <u>cannot</u> be included in ratios.	 Firefighter speaking to 4-H club about safety Professor giving a two-hour presentation on physics to a STEM program on campus A student athlete giving a one-time presentation as part of a basketball camp



with each level as you move up this list SECTIONS II and III: Screening and Training Personnel Key Question to Determine the Need for Each Role Type

in Your Activity

Who takes **CUSTODIAL CARE** of Youth?

CUSTODIAL CARE: The temporary responsibility for supervision, care, and/or control of minors. (UW-1045, Definitions)

TIP FROM OYP: There are differences in requirements for Youth Activities taking custodial care of youth and Youth Activities that do not take custodial care. Keep an eye out for those differences on upcoming pages.





SECTIONS II and III: Screening and Training Personnel

Roles for Activities WITH and WITHOUT Custodial Care

TIP FROM OYP: Ensure the number of individuals providing supervision in Youth Activities meets supervision ratio requirements on page 18. In situations where only one adult is required by the ratios, always remember to have a backup.

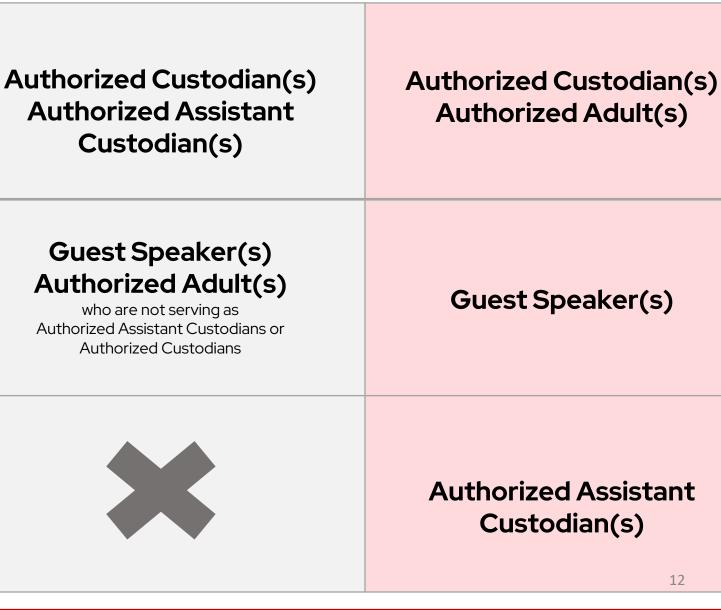


REQUIRED TO HAVE

MAY HAVE

NOT REQUIRED TO

HAVE



Activities WITH

Custodial Care of Youth

Authorized Assistant Custodian(s)

Guest Speaker(s)

Activities WITHOUT

Custodial Care of Youth

SECTION II: Screening Personnel

Ensuring Your Staff are Appropriately Screened

TIPS FROM OYP: Staff planning new youth activities should communicate early and often with their school/college/division's Human Resources professionals.

- Be clear about the roles each staff member and volunteer will play.
- Plan to allow several weeks for the criminal background check process to be completed, even if you are not hiring new employees for this program year.
- Check with Financial Services for your school/college/ division to find out how charges for criminal background checks will be applied to your youth activity.



The Authorized Custodian for the activity must:

- Disclose the youth activity role each adult (employees and volunteers) holds to Human Resources for their school/college/division
- Confirm screening requirements are completed for each adult prior to the start of the activity

Human Resources must ensure employees and volunteers with youth activity roles: (except Guest Speakers)

- Are documented appropriately (e.g., hire letter, volunteer appointment letter, position description)
- Have appropriate Position of Trust or POTAVP designations entered in HRS
- Receive background checks at a frequency reflective of the level of responsibility for youth in the assigned role

SECTION II: Screening Personnel

Position of Trust Designations and Frequency of Criminal Background Checks Required for Each Position Type

All new employees are required to undergo reference checks focused on sexual harassment. Contact your school/college/division Human Resources office with questions.

Reference checks in alignment with <u>UW System</u> <u>Administrative Policy 1275</u> have been added for volunteers serving as authorized assistant custodians. Implementation of this requirement is temporarily on hold.

TIPS FROM OYP: Consult with the Human Resources team in your school/college/division about timing for communicating this type of information.



ROLE TYPE	SCREENING REQUIREMENTS
Authorized Custodian	 Position of Trust with Access to Vulnerable Populations: Two-Year Criminal Background Check Cycle Reference Check: Required for employees (volunteers ineligible for this role)
Authorized Assistant Custodian	 Position of Trust with Access to Vulnerable Populations: Two-Year Criminal Background Check Cycle Reference Check: Required for employees and volunteers (temporarily on-hold for volunteers)
Authorized Adult	 Position of Trust with Access to Vulnerable Populations: Four-Year Criminal Background Check Cycle Reference Check: Required for employees.
Guest Speaker	Not required

SECTION III: Training Personnel

Required Training Prior to Serving in Youth Activity Roles

Additional training, including Preventing Sexual Harassment and Sexual Violence at UW-Madison, is required of all UW-Madison employees, regardless of the duration of the employment. Individuals involved in higher risk activities (e.g., swimming, using chemicals) or who handle food may be required to complete training or certifications related to that activity.

It is the responsibility of the youth activity Authorized Custodian and/or the school/college/division's Human Resources office to track youth protection training requirements and ensure that specific requirements related to the activity are met.



ROLE TYPE	CURRENT TRAINING REQUIREMENTS
Authorized Custodian	 <u>Mandatory Reporting of Child Abuse</u> <u>and Neglect</u> (Every 2 years)* <u>Responsible Employee</u> (Annually) <u>Clery Campus Security Authority</u> (Annually) Training on effective youth protection practices (Every 2 years)**
	 If working in a residential youth activity under ATCP-78: Sexual Abuse Prevention Training (Annually)
Authorized Assistant Custodian	 Mandatory Reporting of Child Abuse and Neglect (Every 2 years)* Sexual Misconduct and Clery Crimes in Youth Activities: Reporting and Prevention (Annually)* Training on effective youth protection practices (Every 2 years)**
	 If working in a residential youth activity under ATCP-78: Sexual Abuse Prevention Training (Annually)
Authorized Adult	 <u>Mandatory Reporting of Child Abuse</u> <u>and Neglect</u> (Every 2 years)* Training on university processes for reporting sexual misconduct (Every 2 years)**
Guest Speaker	• None

* These trainings are also available for volunteers who do not have NetIDs.

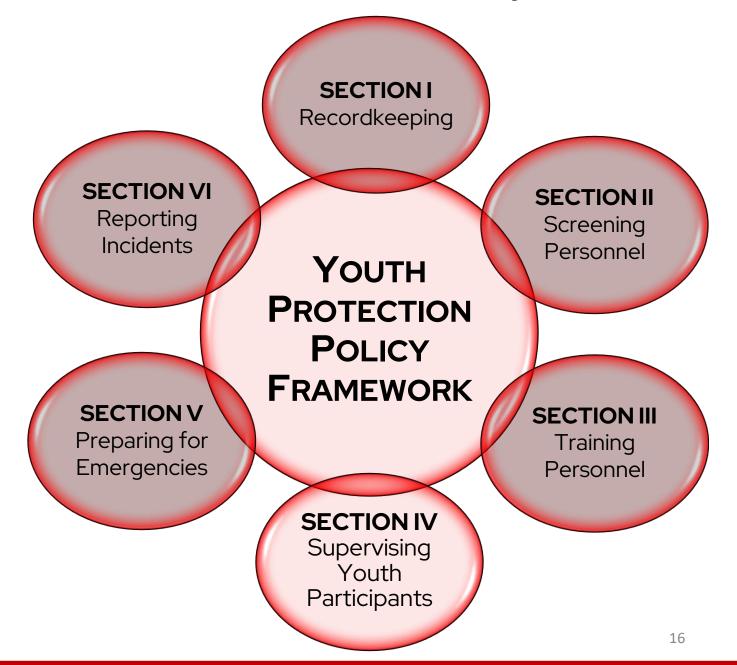
** Under development

SECTION IV: Supervising Youth Participants

Behavior Standards and Expectations of Personnel when Interacting with Youth



Youth Protection Policy, UW-1045



SECTION IV: Supervising Youth Participants See Section IV.B.

Ensure Staff and Participants are Aware of the Range of Conduct that is Prohibited, including GROOMING

GROOMING: Describes the process whereby a person engages in a series or pattern of behaviors with the goal of engaging in sexual misconduct. Grooming is initiated when a person seeks out a vulnerable youth. Once selected, offenders will then earn the youth's trust, and potentially the trust of the youth's family. After the offender has engaged the youth in sexually inappropriate behavior, the offender seeks to maintain control over them. Grooming occurs through direct, in-person, or online contact (UW-1045, Definitions).

TIP FROM OYP: Consider viewing this video to better understand the impact of grooming: **Darkness to Light: Keeping Kids Safe from Grooming and Manipulation**





SECTION IV: Supervising Youth Participants

Meet Required Supervision Ratios

Supervision ratios in Youth Activities must meet the minimum standards set through <u>ATCP 78.26</u>. This standard must be met by the group responsible for custodial care. Requirements for 2024 are listed on this page.

Youth activities that possess a current American Camp Association (ACA) accreditation operating day and/or evening hours with no overnight component may default to ACA supervision ratios.

TIP FROM OYP: Think about how to maintain ratios if staff are unable to work due to illness. Hiring extra staff or training and screening additional volunteers can help Youth Activities with maintaining ratios.



Supervision Ratio Requirements

maintained.

Age of YOUTH PARTICIPANTS	Supervision Ratio (STAFF: YOUTH PARTICIPANT)
In all situations Ages 6 and under	1 STAFF member to every 4 YOUTH PARTICIPANTS (or fraction thereof)
In all situations Ages 7 through 9	1 STAFF member to every 10 YOUTH PARTICIPANTS (or fraction thereof)
In a classroom setting and transitioning between buildings Ages 10 and above	1 STAFF member to every 18 YOUTH PARTICIPANTS (or fraction thereof)
In all situations outside of those listed directly above Ages 10 and above	1 STAFF member to every 10 YOUTH PARTICIPANTS (or fraction thereof)
 If a single supervising STAFF member is required during time in a classroom, another STAFF member must be reachable via cell phone and respond in-person within five minutes if assistance is needed. A minimum of two STAFF members are required to accompany YOUTH PARTICIPANTS on all field trips; ratios referenced above must also be 	

SECTION IV: Supervising Youth Participants See Section IV.B.

One-on-One Interactions

Since abuse typically occurs in isolated one-on-one situations, remember to implement the rule of three. This means that there should always be at least three people present for any activity, unless it meets the criteria for exceptions in Section IV.B. 1-3

TIP FROM OYP: Whenever interacting with youth, think about how your interactions can be **OBSERVABLE AND INTERRUPTIBLE.** That means, the interaction should take place in such a way that another person can see, hear, or has knowledge of the interaction and can interrupt if needed (UW-1045, Definitions).





SECTION V: Preparing for Emergencies All Youth Activities Must Have a Safety Plan

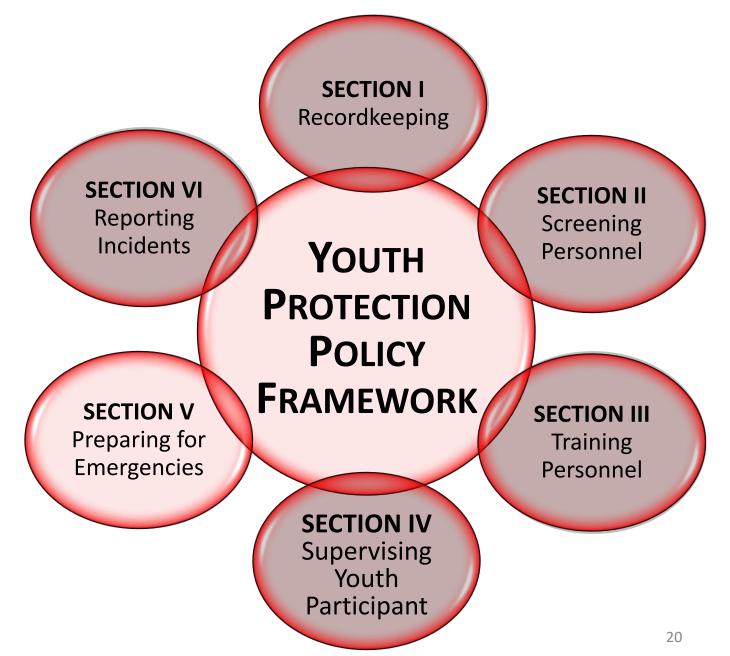
The youth activity safety plan must address emergencies including fire, power outage, severe weather, lost or missing youth participant, and medical emergencies. Additionally, all activities must have clear protocols to address infectious disease (e.g., measles, flu, Covid) outbreaks among staff or youth.

Each activity is responsible for ensuring that their safety plan meets all requirements that apply to the activity. For example, certain high-risk activities (e.g., swimming, woodworking) may need to address additional items in their safety plans.

TIP FROM OYP: Consider using the <u>Emergency</u> <u>Response Template</u> developed by OYP as a guide for creating protocols. It's recommended that you upload your Emergency Response plan to the program Simple Safe Zone (SSZ).



Youth Protection Policy, UW-1045



SECTION VI: Reporting Incidents

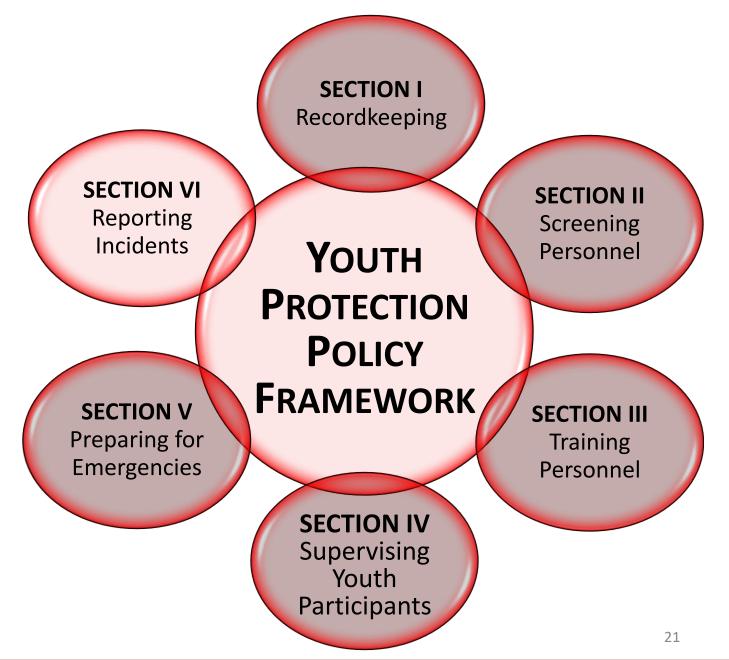
Staff Must Report Incidents to Appropriate Authorities in a Timely Manner

UW-Madison's required training for each role informs employees and volunteers serving in youth activities about their reporting obligations. Remember, call 911 or the UWPD (if the activity takes place on campus) before completing any reports if the situation is a medical or life-threatening emergency.

TIP FROM OYP: Visit the OYP website at <u>youthprotection.wisc.edu/reporting</u> to learn more about your reporting requirements. In addition, use the chart on the next page as a reporting resource. Consider including a copy of the chart in training materials for the activity. A more detailed version of the chart can be <u>downloaded</u> from the UW-Madison website.



Youth Protection Policy, UW-1045



SECTION VI: Reporting Incidents

Staff Must Report Incidents to Appropriate Authorities in a Timely Manner

For questions on reporting Sexual Harassment and Sexual Violence, contact Lindsey Peterson with the Sexual Misconduct and Response Program in the Office of Compliance at <u>lindsey.peterson@wisc.edu.</u>





Incident Reporting Obligations

for Youth Activities

Call 911 in an emergency. Meet reporting obligations AFTER a situation is stabilized.

Category	Type of Incident	Reporter	Reporting Procedure
Mandatory Reports by Law or Policy (refer to definitions on page 2)			
Child Abuse and Neglect per Executive Order #54 Applies to: All minors (under age 18) Any location	Physical Abuse, Physical Neglect, or Threat of Abuse or Neglect Emotional Abuse Sexual Abuse Abuse by Manufacture of Methamphetamine	<u>All</u> Authorized Adults (It is not enough to tell a supervisor. Those who witness or suspect abuse or neglect must make the report.)	 All: Report by telephone or in person to local police or Child Protective Services (CPS) Also: If the incident occurred on campus or in a UW sponsored activity or involves a UW employee or agent, then also report to campus. Refer to youthsafety.wisc.edu/report-child-abuse
Sexual Harassment and Sexual Violence per UW–Madison campus policy Applies to: All minors and adults Any location	Sexual Harassment, Sexual Exploitation, and Retaliation Sexual Violence, including: Dating Violence, Domestic Violence, and Stalking Sexual Assault, including: Rape, Fondling, Incest, and Statutory Rape Sexual Assault witnessed on campus or of a UW–Madison student	Authorized Custodians and Authorized Assistant Custodians (those with custodial care or supervision of minors) <u>All</u> Authorized Adults	Complete the online Campus Reporting Form <u>go.wisc.edu/report</u> Report an incident that is both Sexual Harassment/Sexual Violence
Clery Crimes on Campus Applies to: All minors and adults Clery Campus Geography	Sexual Violence, including: Dating Violence, Domestic Violence, and Stalking Sexual Assault, including: Rape, Fondling, Incest, and Statutory Rape Homicide, Aggravated Assault, Robbery, Burglary, and Arson Hate Crimes, including: Simple Assault, Intimidation, Property Damage, and Theft	Authorized Custodians and Authorized Assistant Custodians (those with custodial care or supervision of minors)	and a Clery Crime on a single form. Complete the online Campus Reporting Form <u>go.wisc.edu/report</u>

SECTION VII: Data Retention

Records Retention Schedules for Youth Activities

Youth activity records must be maintained according to the UW System Youth Records Schedules and any other relevant retention schedules.

All records retention schedules for UW-Madison can be found at: <u>https://www.library.wisc.edu/archives/recor</u> <u>ds-management/uw-madison-records-</u> retention-schedules-and-disposition/.

In addition to the schedules in the table on this page, youth activities may be responsible for adhering to other relevant schedules.



Record Type	Retention	
Youth Activity Participant Records: Enrolled and Attended	Date Activity Ends + 7 years	
Youth Activity Participant Records: Did Not Attend	Date Application Denied or Date of Activity + 1 year	
Youth Activity Participant Medical Records	Date Activity Ends +3 years <u>OR</u> Date of 18 th Birthday + 3 years	
Youth Activity Participant Medical Logs	Date Activity Ends + 3 years	
Youth Activity Incident Reports	Date Incident Resolved + 7 years	
Youth Activities - Third Party Contracts	Date Contract Expires + 7 years	

SECTION VIII: Third Parties

Contracts for Third-Party Youth Activities Must Include a Youth Protection Addendum

THIRD PARTY: A non-university organization or entity.

THIRD-PARTY YOUTH ACTIVITY:

An event, operation, endeavor, or activity intended for participation of minors that is organized and operated by a third party and takes place on property owned, rented, or managed by UW-Madison.

Does my school/college/division need to develop its own youth protection addendum?

No. Contact the Office of Youth Protection for youth protection addendum templates. Separate templates are used for commuter and residential programming.

Can a standard space use agreement be used for a third-party youth activity?

Yes. The youth protection addendum can be added to a standard space use agreement.

I have questions about third-party youth activity registration, the contract process, vetting, risks, etc. What do I do?

Contact the Office of Youth Protection at <u>youthprotection@wisc.edu</u> to schedule a consultation as early as possible.



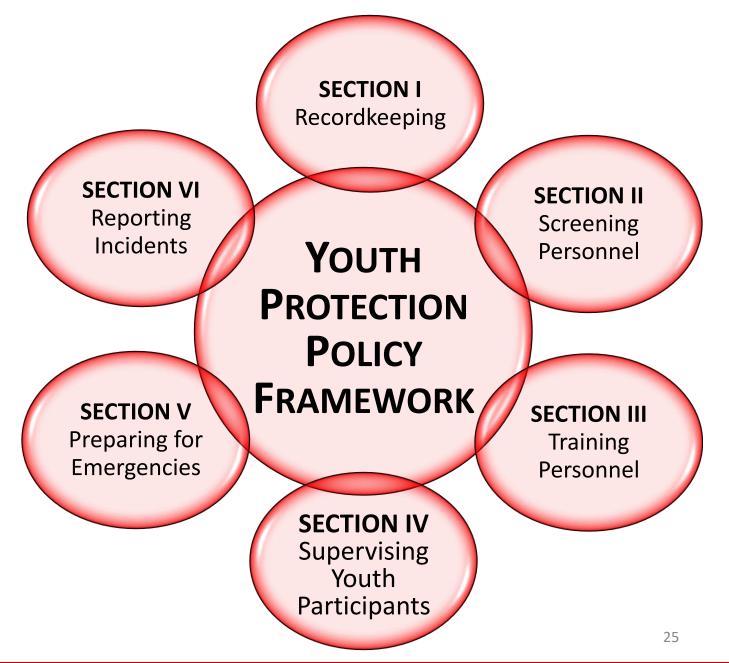
Other Relevant Policies

In addition to <u>UW-1045 Youth Protection</u>, activities involving youth may fall under the following policies.

- UW-146 Policy on Sexual Harassment and Sexual Violence
- UW-301 Policy on Mandatory Reporting of Child Abuse and Neglect (Executive Order 54)
- UW-503 Cybersecurity Risk
 Management Policy
- UW-509 DoIT Incident Reporting and Response Policy
- UW-5014 Criminal Background Check Policy
- UW-5039 Children in the Workplace
- UW-5040 Minor Protection and Adult Leadership HR Policy
- UW-6009 Inclusive Facilities Policy and Procedures for All Buildings
- UW-6106 Minors in Research
 Laboratories Policy



Youth Protection Policy, UW-1045



Questions?

Contact the Office of Youth Protection with questions about activities involving youth on the UW-Madison campus and across the state.

youthprotection@wisc.edu

Location: 21 N. Park Street, 7th Floor Madison, WI 53715



