



Northwestern
University

Approving University Official(s): Provost
Responsible Office: Office of Risk Management, Office of Human Resources, Office of the Provost
Effective date: May 2018
Next review date: May 2021

MINORS AT NORTHWESTERN

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Policy Statement

Northwestern is committed to providing a safe and secure environment for participants in its programs, including minors who participate in camps, clinics, workshops, conferences, research, and other programs and activities sponsored by or affiliated with the University. Members of the Northwestern community who interact with minors in any capacity in connection with these activities are expected to foster and maintain a safe and secure environment for minors by following the guidelines and procedures described or referenced in this policy.

Additionally, Northwestern personnel are required by law to report suspected child abuse or neglect to the Illinois Department of Children and Family Services. The requirements in Section I of this policy relating to the reporting of suspected child abuse or neglect apply to all University personnel, whereas the other requirements of this policy only apply to Covered Programs (as defined below).

Purpose

Consistent with its mission of excellence and innovation in teaching and research, Northwestern organizes, endorses, and allows the use of facilities by programs that serve minors. To protect the health and safety of participating minors and to ensure the University can continue to organize and endorse these

programs, Northwestern community members must follow the requirements of this policy. The purpose of this policy is to help members of the campus community understand the University's expectations for these programs and to provide guidance on best practices.

Audience

All members of the Northwestern community, including faculty, staff, undergraduate and graduate students, postdoctoral fellows, researchers, volunteers, alumni, independent contractors, and third parties who use Northwestern facilities to operate Covered Programs (as defined below).

Definitions

Covered Programs: all programs and activities involving minors sponsored by or affiliated with Northwestern (whether for academic, educational, pre-collegiate, experiential, athletic, artistic, recreational, or other purposes) that are operated either (i) on campus or (ii) off campus under the direction and authority of the University.

However, for purposes of this policy, Covered Programs do not include:

- i. single events on campus (such as festivals, convocations, or athletic events) that are generally open to the public and to people of all age groups at which children may be present;
- ii. campus tours or visits attended by prospective students who are minors;
- iii. Northwestern undergraduate or graduate programs to which minor students are admitted and enrolled on a full-time basis;¹
- iv. the employment of minors at Northwestern;
- v. internships at Northwestern, whether paid or unpaid; or
- vi. research studies subject to the review and approval of an Institutional Review Board (IRB), as these studies are governed by separate standards and oversight.²

Minor: any person under the age of 18.

Non-Northwestern Program: a program or activity that involves minors and uses Northwestern facilities but is not operated under the direction or authority of the University. Non-Northwestern Programs are also Covered Programs (unless an exception applies).

Program Staff: administrators, faculty, staff, undergraduate and graduate students, postdoctoral fellows, researchers, volunteers, alumni, independent contractors, and third-party operators who work directly with, supervise, chaperone, or otherwise oversee minors in Covered Programs. This term does not include temporary program participants (such as guest speakers) who have no direct contact with minors other than short-term activities supervised by Program Staff.

Sponsoring Unit: a Northwestern administrative or academic unit that either (i) offers a program involving minors or (ii) approves the use of University facilities in connection with a Non-Northwestern Program.

¹ Academic programs enrolling minors in alternative, part-time credit programs should consult Northwestern's [Youth on Campus website](#) for resources and guidance.

² Research studies associated with a Covered Program are exempt from the requirements of this policy whereas the Covered Program is not.

Policy Implementation

I. *Reporting suspected child abuse or neglect*

The requirements in this Section relating to the reporting of suspected child abuse or neglect apply to all University personnel.

- A. *Mandated reporters.* Northwestern acts in accordance with applicable law on the reporting of child abuse and neglect. All University personnel—including but not limited to faculty, staff, undergraduate and graduate student employees, graduate students with teaching responsibilities, postdoctoral fellows, researchers, volunteers, independent contractors, and third-party operators participating in Covered Programs—are mandated reporters under the [Illinois Abused and Neglected Child Reporting Act](#).

As mandated reporters, all University personnel must complete the Illinois Department of Children and Family Services (DCFS) [Acknowledgement of Mandated Reporter Status](#) form upon hiring; completed forms are retained by OHR.

Reporting obligation. Illinois law mandates the reporting to Illinois DCFS of child neglect and child abuse by a parent, parent’s romantic partner, immediate family member, other person residing in the child’s home, or other person responsible for the child’s welfare.

Accordingly, any University personnel (as referenced in Section I.A. above) with reasonable cause to believe that a minor known to them in the scope of their work for Northwestern may be neglected or abused by a parent, parent’s romantic partner, immediate family member, other person residing in the child’s home, or other person responsible for the child’s welfare is required to immediately:

- i. report to Illinois DCFS; if the suspected abuse or neglect is occurring outside of Illinois, contact both Illinois DCFS and the applicable state agency; and
- ii. notify the Office of Risk Management and the Office of Compliance, Audit, and Advisory Services in writing that a report has been made.

See “Contacts” below for additional contact information.

Any doubt about reporting a case of suspected abuse or neglect should be resolved in favor of making an immediate report.

Illinois law protects the identity of mandated reporters and gives them immunity from liability for making good faith reports, although reporters may be obligated to testify if a case becomes subject to legal or judicial action.

- B. *Encouragement to report.* Regardless of whether a report to Illinois DCFS is legally required, Northwestern strongly encourages all members of its community to (i) report suspected child abuse or neglect by notifying the Office of Risk Management or the Office for Compliance, Audit, and Advisory Services; and (ii) if the child appears to be in

danger or the incident appears to involve a crime, also contact Northwestern Police or local police (see “Contacts” below for additional contact information).

Community members without an obligation to report who prefer to report anonymously may do so by utilizing [EthicsPoint](#), the University’s phone- and web-based system for confidential reporting.

- C. *Sexual misconduct.* The University’s [Policy on Sexual Misconduct](#) requires all University employees (including student employees) as well as nonemployees with teaching and supervisory authority to promptly report sexual misconduct of which they become aware in the scope of their work to the Title IX Coordinator or Deputy Title IX Coordinator for Students, unless the employee is designated as a confidential resource under the Policy.
- D. *Child pornography.* Any community member who discovers a depiction of child pornography in the scope of their work for Northwestern must immediately report the incident to Northwestern Police (see “Contacts” below for additional contact information).
- E. *Non-retaliation.* The University’s [Policy on Non-Retaliation](#) prohibits retaliation against any member of the Northwestern community for making a good faith report of suspected child abuse or neglect or for acting as a witness in any investigation or proceeding concerning a report of child abuse or neglect. Similarly, individuals who make good faith reports to Illinois DCFS or who act in good faith as witnesses are immune from civil or criminal liability under Illinois law.
- F. *Additional guidance.* For additional guidance on reporting requirements under Illinois law, and on how to report child abuse or neglect, see the [DCFS Manual for Mandated Reporters](#).

The Office of General Counsel can also address questions about reporting requirements, including requirements relating to federally-sponsored research (see “Contacts” below for additional contact information).

II. *Program registration*

The requirements in this section apply to all Covered Programs.

- A. Sponsoring Units must register any Covered Program by submitting a youth program registration form through Northwestern’s [Youth on Campus website](#). Continuing programs must re-register annually to update information. Registration (or re-registration) is due before the program is scheduled to begin.³
- B. When registering, programs will confirm that (i) they will comply with all requirements applicable to Covered Programs in this policy and (ii) all Program Staff have been screened and trained in accordance with Sections III and IV below.

³To ensure programs are fully supported, it is recommended that programs be registered as soon as they are developed.

- C. To request reasonable and necessary exceptions to registration requirements, or for questions regarding compliance, contact the Office of Risk Management (see “Contacts” below for additional contact information).

III. Screening

The requirements in this section apply to all Covered Programs.

- A. *Background checks.* All Program Staff who have direct contact with minors or supervise a program with minors must undergo a criminal background check before working with minors in a Covered Program. Such screening will include, at a minimum, criminal history and sex offender registry searches.

It is the responsibility of the director or supervisor of each Covered Program to ensure that Program Staff have background checks on file. It is recommended that background checks be updated every three years.

Northwestern’s Office of Human Resources (OHR) will conduct the screening of all Program Staff working in University-run programs (see “Contacts” below for contact information to request a new or updated background check). OHR maintains records of completed background checks, and these records will only be accessible through OHR consistent with established policies and protocols.

- B. *Non-Northwestern programs.* Program Staff working in Non-Northwestern programs will not be permitted to work with minors in a Covered Program unless and until the director or supervisor of the program certifies in writing to the Sponsoring Unit that criminal background checks have been conducted and evaluated on all Program Staff. The director or supervisor must also undertake to conduct and evaluate criminal background checks on any future Program Staff before they are hired.

Such background checks must be at least comparable to those referenced in Section III.A, and the director or supervisor must notify OHR if the background check was unsuccessful. This requirement should be documented in the agreement concluded between the program and its Sponsoring Unit (see the [Youth on Campus website](#) for a sample agreement).

- C. *Evaluation.* In the event a prior criminal history or presence on the sex offender registry is revealed for any proposed Program Staff, OHR will assess the information that has been obtained and, in consultation with the Sponsoring Unit (and after providing notice and opportunity to respond to the proposed staff member consistent with OHR procedures), make a determination as to whether the individual should be allowed to work in the Covered Program.

- D. *Self-disclosure.* After completion of an initial background check, all Program Staff are expected to disclose any new arrests or convictions to their program director or supervisor within 72 hours of the occurrence, and to cooperate in providing information necessary to evaluate the circumstances of the arrest and/or conviction.

IV. *Training.*

The requirements in this section apply to all Covered Programs.

A. *Northwestern Programs.* All Program Staff must complete Northwestern web-based training, [Protecting Children on Campus](#), which is available through myHR Learn and supplementary learning management systems. The training must be completed before participating in any Covered Program and should be renewed periodically.

Program Staff are also strongly encouraged to complete the [Illinois DCFS online training for mandated reporters](#). Certain programs may require completion of the Illinois DCFS training in addition to the Northwestern web-based training.

OHR, through its myHR Learn system, is the primary records repository of completion of the trainings required under this policy. It is the responsibility of program directors and supervisors to oversee compliance with these minimum training requirements. Details on completing the training are available on the [Youth on Campus website](#).

B. *Non-Northwestern Programs.* Program Staff working in non-Northwestern programs may not work with minors in a Covered Program until the director of the program certifies in writing to the Sponsoring Unit that all Program Staff have successfully completed training. The director must also agree that any future Program Staff will successfully complete training prior to working with minors in a Covered Program.

Program Staff working in non-Northwestern programs must complete training at least comparable to those referenced in Section IV.A.

V. *Additional program guidelines.*

A. *Rules of conduct applicable to Program Staff.* Program Staff are expected to follow the University's Guidelines Regarding Boundaries with Minors, available on the [Youth on Campus website](#). The Guidelines communicate expectations applicable to all community members involved in programs sponsored by or affiliated with the University; they address how to set appropriate boundaries between community members and minors participating in these programs.

B. *Other guidelines and forms.* Directors, supervisors, and other Program Staff should make every effort to ensure that Covered Programs are administered consistent with best practices. Guidance on best practices is provided on the [Youth on Campus website](#).

VI. *Non-Northwestern Programs*

Non-Northwestern Programs involving minors may be hosted on the University campus, but only if all of the following requirements have been satisfied before using University facilities:

A. *Northwestern sponsor.* The Non-Northwestern Program must secure the written agreement of a Sponsoring Unit to host the program.

B. *Written agreement.* The Non-Northwestern Program must enter into a written agreement with the Sponsoring Unit (a sample agreement is available on the [Youth on Campus website](#)). The agreement must address (i) certification to the Sponsoring Unit that the screening and training requirements of this policy have been met; (ii) commitment to operate the program in

accordance with this policy and applicable law; and (iii) assumption of full financial responsibility for any loss or liability arising from the program.

- C. *Insurance.* The Non-Northwestern Program must submit to the Sponsoring Unit an additional insured endorsement and certificate of insurance, identifying Northwestern (and its trustees, officers, employees, and agents) as an “additional insured party” and conforming to the specifications listed in Northwestern’s Independent Contractor Insurance Requirements (available on the [Youth on Campus website](#)).

Consequences of Violating this Policy

Individuals who are found to have failed to report suspected child abuse or neglect, refused to cooperate with an investigation, engaged in retaliation, or otherwise violated the requirements of this policy may be subject to disciplinary action under University policies and procedures, up to and including termination of employment or academic dismissal. Covered Programs operated in violation of this policy could be denied permission to continue operating at Northwestern. Notwithstanding any contractual provision to the contrary, the University may terminate its relationship with any third-party contractors or volunteers who fail to comply with this policy.

In addition, violation of laws relating to the protection of minors could lead to legal action or criminal sanctions.

Related Information

Youth program guidelines, forms, and other information are available on Northwestern's [Youth on Campus website](#).

[Acknowledgement of Mandated Reporter Status form](#)

[DCFS Manual for Mandated Reporters](#)

[DCFS online training for mandated reporters](#)

[EthicsPoint](#)

[Illinois Abused and Neglected Child Reporting Act](#)

[myHR Learn mandated training – Protecting Children on Campus](#)

[Northwestern Policy on Non-Retaliation](#)

[Northwestern Policy on Sexual Misconduct](#)

[State Child Abuse and Neglect Reporting Numbers](#)

Contacts

The following individuals can address questions regarding this policy:

Luke Figora, Assistant Vice President for Risk Management and Environmental Health and Safety, Office of Risk Management, phone: (847) 491-7696, email: luke.figora@northwestern.edu or risk@northwestern.edu.

Andrea Bueschel, Associate Provost for Strategy and Policy, Office of the Provost, phone: (847) 491-6699, email: bueschel@northwestern.edu.

Caroline Onagan, Director of Talent Acquisition, Office of Human Resources, phone: (847) 467-3289, email: caroline.onagan@northwestern.edu.

For information relating to criminal background screening, contact:

Caroline Onagan, Director of Talent Acquisition, Office of Human Resources, phone: (847) 467-3289, email: caroline.onagan@northwestern.edu.

To report suspected child abuse and/or neglect:

1. Mandated reporters should contact Illinois Department of Children and Family Services (DCFS), at 1-800-25ABUSE.⁴
2. If the incident is an emergency, contact Northwestern Police, at 847-491-3456 (Evanston), 312-503-3456 (Chicago), or dial 911 for local police.
3. To provide notice of a mandatory report made to DCFS, or to otherwise report suspected child abuse and/or neglect, contact:

Luke Figora, Assistant Vice President for Risk Management and Environmental Health and Safety, Office of Risk Management, at (847) 491-7696, or luke.figora@northwestern.edu or risk@northwestern.edu; and

Office of Compliance, Audit, and Advisory Services, at (847) 467-6170, or university.compliance@northwestern.edu.

To report sexual misconduct, contact the Interim Title IX Coordinator, at (847) 467-6571 or TitleIXCoordinator@northwestern.edu or the Deputy Title IX Coordinator for Students, at (847) 467-6571 or DeputyTitleIXCoordinator@northwestern.edu.

To report child pornography, contact Northwestern Police, at 847-491-3456 (Evanston), 312-503-3456 (Chicago), or dial 911 for local police.

The following office can address legal questions about reporting suspected child abuse or neglect:

Office of General Counsel, at (847) 491-5605 or www.northwestern.edu/general-counsel.

History

Revises and supersedes the Reporting Suspected Child Abuse and Neglect Policy dated October 2013.

Policy URL:

<https://policies.northwestern.edu/docs/minors-at-northwestern-final.pdf>

⁴If the suspected abuse or neglect is occurring outside of Illinois, [contact information for other state agencies](#) in the U.S. is available online.