MINORS IN VILLANOVA UNIVERSITY PROGRAMS

I. Purpose and Scope

This Policy establishes safeguards for youth under the age of 18 who participate in activities and programs taking place on the University's campus, in University facilities, or under the authority of the University at off-campus locations. It covers all activities designed primarily to serve Minors.

The Policy applies to all departments and areas of the University. Athletic camps, academic camps, service programs, recruiting programs and similar activities intended for Minors come within the Policy's scope. The Policy applies to programs operated internally or externally, on campus or off campus, and during the day or overnight. This Policy does not apply to any limited duration (not ongoing, regular or repeated) program or activity where children under 18 years of age (“Minors”) are accompanied by their parents and/or legal guardians at all times.

The University expects all members of the University community-- faculty, staff, students, and volunteers -- to abide by this Policy. Failure to do so may lead to disciplinary action up to and including separation from the University, revocation of the opportunity to use Villanova Facilities or cancellation of the youth-serving program.

II. Definitions

- **Adult.** Any person who may come into contact with a Minor as part of his or her job responsibilities or volunteer activities on behalf of Villanova University.

- **Compliance Office.** The University Compliance Office.

- **Minor.** Anyone under 18 years of age.

- **Program.** Any activity or program designed primarily to serve Minors that is: (1) sponsored by Villanova University, regardless of where it is held; (2) sponsored by a third party in Villanova Facilities; or (3) sponsored by a party at an off-campus location where Villanova Adults engage through their University roles.

- **Program Director.** The Adult with overall supervisory responsibility for a Program involving Minors. Further the Program Director is the Adult who oversees the day to day Program operations and, as such, is expected to have Significant Contact with Minors (as described below). Examples of Program Directors include, among others, a camp director, a staff member coordinating a tutoring program, and the faculty advisor of a student group sponsoring a youth-serving activity.
• **Villanova Facilities.** Premises owned, leased, or otherwise controlled by Villanova University including, for example, off-campus athletic facilities.

• **Direct Contact** with a Minor means the care, supervision, guidance or control of Minors or routine interaction with Minors. Note that this definition of “Direct Contact” applies to contact with Minors *in the context of employment*, while the “Direct Volunteer Contact” (see below) applies to contact with Minors in the context of volunteer service.

• **Direct Volunteer Contact** with a Minor means *both* the care, supervision, guidance or control of Minors *and* routine interaction with Minors.

• **Significant Contact with Minors.** “Significant Contact with Minors” is contact between an Adult and one or more Minors that:

  1. For individuals serving in a volunteer capacity (i.e., the individual is serving as a volunteer in connection with the Program), consists of Direct Volunteer Contact with one or more Minors;
  2. For individuals serving in an employment capacity (i.e., the Program is part of the individual’s employment responsibilities), consists of Direct Contact with one or more Minors.

• **Routine Interaction with Minors.** “Routine Interaction with Minors” is the regular or repeated contact with Minors that is integral to the responsibilities of the University employee or volunteer.

The following persons are *always* deemed to have “Significant Contact with Minors:” Program Directors; Villanova Conference Services employees; and employees and volunteers of third-party Programs in Villanova Facilities. Athletic camps and clinics owned and operated by Villanova Athletics coaches, as well as their directors, employees, contractors and volunteers, also are deemed always to have “Significant Contact with Minors”, regardless of whether the above criteria are met.

• **Incidental Contact with Minors.** Having less than “Significant Contact with Minors” as defined above. In order to be considered Incidental Contact with Minors, all criteria specified below must be met.

  1. For a Villanova student volunteer to have Incidental Contact with Minors at a Villanova on-campus event, such student volunteer must be:
     a. Currently enrolled at Villanova;
     b. Not responsible for the Minor(s)’s welfare (i.e., the student is not providing permanent or temporary care, supervision, mental health diagnosis or treatment, training or control of a child in lieu of parental care, supervision and control);
     c. Volunteering for an event occurring on Villanova’s campus;
     d. Volunteering for an event sponsored by Villanova; and
     e. Not volunteering at an event for Minors in the care of a child care service (i.e., a day care center. home or service (including day care provided by a school), foster home, juvenile detention center, mental health service for children, service for
children with intellectual disabilities, early intervention service, drug and alcohol service or similar licensed child care service).

2. For Villanova Employees or Non-employee Adults (except for Villanova student volunteers at Villanova events described above), such individuals must not have Significant Contact with Minors and:

   a. have interaction with Minors only in a public setting where there is little or no opportunity for privacy with Minors and absolutely no one-on-one contact with Minors;
   b. be part of a program, service or activity where at least one Villanova Employee has completed the three (3) criminal background checks described in Section IV.D. of this Policy; and
   c. not be counted in order to meet Program staffing ratios described in Section IV.G. of this Policy.

   If the Program Director is uncertain about whether a Program involves Significant or Incidental Contact with Minors, the Program Director should consult with Risk Management and Insurance or the University Compliance Office, or treat the Program as involving Significant Contact with Minors.

III. Program Guidelines

- Before engaging in any Program, Program Directors must satisfy the requirements of Section IV, below.

- Non-University organizations and entities that operate Programs involving Minors in Villanova Facilities must comply with this Policy.

- To the extent faculty, staff, or students participate through their University roles in a Program sponsored by a third party off campus, they should familiarize themselves with and follow the child protection policies of the third-party organization in addition to this Policy.

IV. Program Requirements

All Programs covered by this Policy must meet the following requirements:

A. Program Registration and Documentation

At least 60 days prior to the beginning of a Program, the Program Director or his or her designee shall register the Program via the University’s online registration system for Programs serving Minors. The Program Director must register each Program annually. The online registration system will allow the Program Director to upload onto the system the documents required by this Policy in order to sponsor a youth program or event including, without limitation, the results of the criminal background checks, training certifications, participant waivers, and roster of individuals who are assigned to
work in the youth program as either an employee or volunteer. In addition, the Program Director will be required to submit the names of all individuals, whether Villanova University employees, students, independent contractors, or volunteers, who will be participating in the Program.

Programs that involve only Incidental Contact with Minors and that are planned fewer than 60 days in advance should register as soon as practicable; in no case shall such registration occur fewer than 14 days in advance of the anticipated Program commencement date.

No registration shall be required for Programs in which high school aged Minors visit campus for a tour unless, as part of the visit, the University offers activities in addition to the tour, such as the use of the ropes course, pools or other Athletics facilities, or the tour includes a visit to a lab in which demonstrations or experiments are taking place.

**B. Required Written Agreements**

1. Participant Waivers
   
a. Participant waivers are required for Minors participating in the following Programs held in Villanova Facilities:

   i. Villanova sponsored Programs
   ii. Athletics camps
   iii. Third-party Programs in accordance with the contract with Villanova

   b. The parent/guardian and, if age-appropriate, the Minor shall execute a University-approved waiver form and provide the waiver to the Program Director. Prior to the beginning of the Program, the Program Director shall provide signed waiver forms for all of the Program’s Minor participants to the University Compliance Office via the online registration system.

   c. The University Compliance Office shall retain all waiver forms signed by parents/guardians and Minors for at least fifty (50) years, given Pennsylvania's lengthy statute of limitations for claims alleging child abuse.

2. Facility Use or Other Required Agreements
   
a. Third-party Programs involving Minors using Villanova Facilities for housing or dining services shall execute a Conference Services License Agreement.

   b. For those third-party Programs involving Minors using Villanova Facilities that are not contracting with Conference Services for housing or dining on campus, the third party shall execute a Facilities Use Agreement or other University form as approved by Risk Management and Insurance.
c. The Program Director shall contact Risk Management and Insurance for agreements and waivers appropriate for the Program prior to or at the time of registering the Program.

C. Screening Requirements

The Program Director shall conduct reference checks for all Adults with Significant Contact with Minors.

Villanova employees with Significant Contact with Minors are required to complete the Arrest/Conviction Report and Certification Form, attached as Appendix C, and provide it to the Human Resources Director of Employee Relations and Compliance ("HR-Employee Relations/Compliance Director") prior to participation in a Program.

D. Criminal Background Checks

Criminal background checks are required for Adults involved with Programs as follows:

1. Requirements for Adults with Significant Contact with Minors

Adults who have Significant Contact with Minors must undergo the following criminal background checks:

- Pennsylvania State Police Access to Criminal History (PATCH)
- Pennsylvania Department of Human Services Child Abuse History Clearance
- Federal Criminal History Record Information (FBI fingerprint check)

Before an Adult has Significant Contact with Minors in a Program, the Adult must provide proof that all three of the criminal background checks are in process, and at least one of the checks must have been satisfactorily completed. The result of the remaining checks must be provided upon receipt from the agency.

For Adults with only Direct Volunteer Contact (i.e., not Direct Contact, which occurs in the course of employment) with Minors in a Program, the following criminal background checks may be provided:

1. For Adult volunteers who have lived in Pennsylvania continuously for the past ten (10) years, the PATCH and the Pennsylvania Child Abuse History Clearance, together with a signed affidavit from the Adult swearing or affirming in writing that the Adult is not disqualified from service in the Program under Pennsylvania law; and
2. For Adult volunteers who are Pennsylvania residents who have lived in Pennsylvania for less than ten (10) years, a FBI fingerprint check performed after the Adult volunteer became a Pennsylvania resident and the PATCH and the Pennsylvania Child Abuse History Clearance.

If an Adult does not have all checks completed as of the start date of the Program, the Program Director must:
(i) have received a copy of the one completed check,
(ii) have received a copy of the completed application for the other two checks, and
(iii) have a signed affidavit from the Adult swearing or affirming in writing that the Adult is not disqualified from service in the Program under Pennsylvania law. Affidavits for University employees or volunteers in Villanova Sponsored Programs may be requested from the HR-Employee Relations/Compliance Director or the University Compliance Office.

a. **Villanova Employees with Significant Contact with Minors.** Program Directors or Department Heads shall notify the HR-Employee Relations/Compliance Director about any University employees who have or will have Significant Contact with Minors. The employees shall contact the HR-Employee Relations/Compliance Director in order to complete the required criminal background checks. New hires who will have Significant Contact with Minors must complete the background check process at the time of hire.

Employees who have Significant Contact with Minors, including Program Directors, must submit completed criminal background checks during calendar year 2015 and renew them every 60 months. The HR-Employee Relations/Compliance Director, in consultation as needed with the Office of the General Counsel, shall review the background check results and make an individualized determination for approval or disapproval. The process to be followed for adjudication is set forth in Villanova University’s Background Screening Policy. For employees who do not have all checks completed as of the start date for the Program, the HR-Employee Relations/Compliance Director must receive copies of the documents described in (i)-(iii) immediately above this subparagraph a (copies of completed checks and applications for other checks, plus the signed affidavit), and the Program Director must follow any instructions from the HR-Employee Relations/Compliance Director regarding checks that are not timely completed as described in Paragraph K below.

b. **Non-University Employee Adults with Significant Contact with Minors in Villanova Sponsored Programs or Athletic Camps.** The Program Director is responsible for obtaining criminal background checks for Program staff who are not employed by Villanova University and who will have Significant Contact with Minors and volunteers who will have Significant Contact with Minors. For Non-Employee Adults, the background checks must be dated no more than 60 months prior to the start date of the Significant Contact with Minors Program. If the clearances are dated as having been completed over one year ago, but within the 60 months prior to the start date of the Program, the Program Director may request that the Non-Employee Adult submit a DISCLOSURE STATEMENT-APPLICATION FOR PROVISIONAL EMPLOYMENT in addition to copies of the actual clearances. The University Compliance Office shall review background checks for Non-Employee Adults and shall notify the Program Director of any background check that would prevent or limit any such Non-Employee Adults from participating in a program for Minors. The process to be
followed for adjudication is set forth in Villanova University’s Background Screening Policy. The cost for completing criminal background checks for non-employees will be the responsibility of the individual, unless the Program Director specifically authorizes payment to be made via their Program budget. For Non-University Employee Adults who do not have all checks completed as of the start date for the Program, the University Compliance Office must receive copies of the documents described in (i)-(iii) immediately above subparagraph a (copies of completed checks and applications for other checks, plus the signed affidavit), and the Program Director must follow any instructions from the University Compliance Office regarding checks that are not timely completed as described in Paragraph K below.

c. **Non-University Employee Adults in Third-Party Programs.** Background checks shall be required in accordance with the University’s Facility Use or other required agreement with the third party.

d. **Screening.** All Adults with Significant Contact with Minors shall also be subject to the screening procedures described in Section IV.C above.

2. **Requirements for Adults with Incidental Contact with Minors in Villanova Sponsored Programs**

   a. For Adults having only Incidental Contact with Minors, the University strongly encourages the Program Director to confirm, prior to the commencement of the Program, that the individuals do not appear on the Pennsylvania State Police Megan's Law registry at [http://www.pameganslaw.state.pa.us/](http://www.pameganslaw.state.pa.us/) or the federal national sex offender registry at [www.nsopw.gov](http://www.nsopw.gov). These checks are instantaneous and free of charge. If such checks are conducted, the Program Director should maintain the results in his/her files.

   b. Adults having only Incidental Contact with Minors are not required to complete a criminal background check. This includes situations wherein an Adult participates in a Program during which other Adults have Significant Contact with Minors, but the Adult him/herself has only Incidental Contact with Minors through his/her participation. For example, an Adult provides a one hour workshop as part of the scheduled activities of an overnight youth camp sponsored by Villanova. Note that certain Adults are defined as automatically having Significant Contact with Minors (e.g., Program Directors, see the definition of “Significant Contact with Minors” in Section II above).

**E. Behavioral Expectations for Adults**

Adults participating in any Program covered by this Policy **shall:**

1. Be vigilant in protecting the well-being and safety of Minors with whom they interact on campus or elsewhere.
2. Review the informational material about the signs of abuse and neglect of Minors in Appendix A.

3. Watch for signs of Minor abuse or neglect and promptly report suspected instances of abuse or neglect, or violations of this Policy or law, as provided in Section IV.J below.

Adults participating in any Program covered by this Policy shall not:

1. Be alone with a Minor. If one-on-one interaction is necessary (“Significant Contact with Minors” Program), the interaction must take place in an area visible to others to ensure there is no opportunity for privacy.

2. Have any direct electronic and/or social media contact with Minors, unless it is related to the Program and another Adult is included in the communication. This provision shall not apply to Athletic recruiting.

3. Have contact with a Minor outside of the Program (e.g., babysitting, home visits).

4. Enter a facility in use by a Minor such as a bathroom, locker room, residence hall room (if applicable), or similar area without another Adult present, consistent with the policy of avoiding one-on-one contact with Minors.

5. Engage in abusive conduct of any kind toward, or in the presence of, a Minor.

6. Hit, physically assault, or inappropriately touch Minors; use language, make suggestions, or offer advice which is inappropriate, offensive or abusive; behave in a manner that is sexually provocative; act in ways intended to shame, humiliate, belittle or degrade Minors; or otherwise perpetrate any form of emotional abuse.

7. Drive with a Minor in a University vehicle and/or a personal vehicle (e.g. pick up Minors from or drop off Minors at their homes or transport them to and from off campus activities). Note Adults may transport prospective student athletes in conjunction with campus visits (e.g., to and from airport, to and from University sporting events) as long as the Adult is never alone with a Minor. In addition, Minors may be transported by Public Safety in University vehicles and VEMS via ambulance as needed.

8. Provide alcohol or illegal drugs to any Minor or facilitate the Minor’s presence at an event where there is underage consumption of alcohol or use of illegal drugs. Adults shall not provide prescription or over-the-counter medication to any Minor unless specifically authorized in writing by the parent or legal guardian as being required for the Minor’s care or the Minor’s emergency treatment. Minors’ medicines may only be distributed by Program staff under the conditions outlined in Section IV. H. (6) in this Policy.
9. Make sexual materials in any form available to Minors or assist them in any way in gaining access to such materials.

10. Engage in inappropriate conversations with Minors that are sexual in nature.

11. Take photos or videos of a Minor with personal cell phones, cameras or similar devices in showers, locker rooms, restrooms or other areas where privacy is expected.

12. Give gifts to Minors independent of gifts provided by the Program.

Items E.3 and 4 do not apply to pre-enrollment visits by high school students, including prospective student athletes, hosted by University students.

F. Training for Adults

All Adults who participate in Programs involving Minors must complete youth protection training at least every two years, prior to the commencement of the Program. Youth protection training for all Adults must include a review of:

- Basic warning signs of abuse or neglect of Minors
- Guidelines for protecting Minors from emotional and physical abuse and neglect
- Requirements and procedures for reporting incidents of suspected abuse, neglect, or improper conduct

Following completion of the required training, the Adult must sign a Youth Protection Training Certification form. The Program Director must upload the Certification forms onto the online registration system. If, for any reason, this is not feasible, then such forms must be submitted by the Villanova employee Adults to the HR-Employee Relations/Compliance Director. Forms for Non-University Employee Adults must be submitted to the University Compliance Office. Training may be expanded, at the option of the Program Director, to meet the Program's needs.

In addition, all Adults with Significant Contact with Minors must complete the Higher Education version of the online training course entitled: Protecting Children from Sexual Misconduct: How Teachers and Other Educators Can Protect Our Children found at www.edurisklearning.org. This training must be completed on or after January 1, 2015 and renewed every 60 months. Upon completion, Adults must print their Certificate of Achievement or their Transcript evidencing their completion of the course from the EduRisk Learning website. The Program Director must upload the Certificates of Achievement of the Transcript forms onto the online registration system. If, for any reason, this is not feasible, then such forms must be submitted by the Villanova employee Adults to the HR-Employee Relations/Compliance Director. Non-University Employee Adults must submit their forms to the University Compliance Office. Adult Volunteers who have successfully completed the Archdiocese of Philadelphia’s training titled “Protecting God’s Children” within the prior 60 months may submit proof of their
successful completion of this program within the prior 60 months in lieu of completion of the EduRisk Learning program described above.

All athletic camps owned and operated by Villanova coaches must comply with the youth protection training requirements of this Policy.

Specific requirements and procedures for youth protection training appear in Appendix B. The Youth Protection Training Certification form that must be signed following completion of youth protection training can be found at the end of Appendix B.

Except for athletic camps owned and operated by Villanova coaches which are required to complete the Youth Protection Training and online course described in Appendix B, third-party organizations operating Programs involving Minors in Villanova Facilities must provide youth protection training to their Adults that covers the basic warning signs of abuse or neglect of Minors; offers guidelines for protecting Minors from emotional and physical abuse and neglect; and imposes requirements and procedures for reporting incidents of suspected abuse, neglect or improper conduct.

G. Staffing Ratios and Supervision

1. Staffing Ratios

Each Program must meet the following minimum ratios of Adults (with all required clearances and training) to Minors:

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<th>Ages</th>
<th>Adult-to-Minor Ratio for Overnight Programs</th>
<th>Adult-to-Minor Ratio for Day Programs</th>
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For purposes of the staffing ratios, the Adults must be at least 18 years of age and have completed required youth protection training before interacting with Minors.

If, however, a Minor’s parent or guardian supervises the Minor at all times during the Program, the required minimum staffing ratios do not apply to that Minor. The parent or guardian of a Minor participating in the Program shall not supervise and have routine interaction with other Minors without qualifying as a volunteer for the Program.

2. Supervision

In addition to ensuring the Staffing Ratios above are maintained for the duration of the Program, each Program Director shall:

a. Provide effective supervision for Adults involved with a Program.
b. Prohibit participation by any child under the age of six, unless the child is accompanied at all times by his or her parent or guardian.

c. Prohibit all one-on-one contact between an Adult and a Minor, unless the Adult is the Minor's parent or guardian.

d. Restrict Minors to designated general-use facilities such as athletic fields, public spaces, and academic buildings. Place off-limits to Minors facilities including: storage rooms, equipment rooms, athletic training rooms, staff/faculty offices, closets, attics, unfinished basement space, and other areas not needed for Program activities.

e. Prohibit Minors from utilizing equipment that poses special hazards such as:
   - Power tools
   - Scaffolds, ladders, and similar equipment involving heights
   - Cooking equipment involving heat such as rotisseries, deep fryers, and grills
   - Food slicers
   - Kilns
   - Lawn mowers
   - Golf carts, gators, or other motorized vehicles
   - Hoisting apparatus
   - Compactors

f. Assign a supervisory Adult (with all required clearances) to be on-site and available to Minors at all times. For overnight programs, the supervisory Adult must reside in the housing unit.

H. Emergency and Safety Protocols for Programs in Villanova Facilities

Each Program Director shall:

1. Establish a procedure for notifying the Minor’s parent/legal guardian in case of an emergency, including medical or behavioral problems, natural disasters, or other significant disruptions. The Program Director shall provide written information on the notification procedure to Adults involved in the Program, parents/legal guardians of Minors, and, if age appropriate, the Minor.

2. For overnight Programs, provide a roster of all Minors participating in the Program to the Department of Public Safety. The roster shall include each Minor’s name, gender, age, and home address; local room assignment (if any); phone number(s) of parent or legal guardian; and emergency contact information.

3. Provide information to the parent or legal guardian detailing the manner in which the Minor can be contacted during the Program.
For overnight Programs, provide the Department of Public Safety with a roster of Program staff and contact information, including information on the Program Director.

For overnight Programs, distribute to all Minors (unless age-inappropriate) and staff the Public Safety Emergency Procedures Bulletin. Review the information in the Bulletin with them upon arrival or as soon as practicable thereafter, but prior to their first night on campus.

Follow guidance from the Minor's personal physician for epinephrine (“epi”) pens, and other health matters. Program staff may distribute medications to Minors only under the following conditions:

a. The Minor’s family must provide the medicine in its original pharmacy container labeled with the Minor’s name, medicine name, dosage, and timing of consumption. Over-the-counter medications must be provided in the manufacturer’s container and labeled with the Minor's name, dosage, and timing of consumption.

b. The parent or guardian must provide written authorization before Program staff may distribute any medication to a Minor.

c. Program staff shall keep the medicine in a secure location and, at the appropriate time for distribution, meet with the Minor in the presence of another Adult.

d. The Program staff member shall allow the Minor to self-administer the appropriate dose as shown on the container.

e. For medicine that the Minor cannot self-administer, the parent or guardian must make arrangements with a third-party health care professional unaffiliated with the University in advance of the Minor’s arrival. In no event will a University health care professional be responsible for such administration.

f. Minors may carry personal “epi” pens and inhalers during activities for self-administration.

g. Follow appropriate safety measures approved by the Office of Environmental Health & Safety for laboratory and research work including, but not limited to, training on lab safety.

I. Rules and Disciplinary Measures for Programs in Villanova Facilities

Each Program Director shall develop and make available to participants the rules and disciplinary measures applicable to the Program. Program participants and staff must abide by all applicable University policies and regulations and may be removed from the Program for non-compliance. Program rules must include the following:
1. The possession or use of alcohol and other drugs, fireworks, guns, and other weapons is prohibited.

2. The operation of a motor vehicle by Minors is prohibited while participating in a Program.

3. Staff and participants must park vehicles in accordance with University parking regulations.

4. Minors may leave University property during the Program only under stated conditions.

5. No theft or violence, including sexual abuse or harassment, will be tolerated.

6. Hazing of any kind is prohibited. Bullying, including verbal, physical, and cyber bullying, is prohibited.

7. No use of tobacco products will be tolerated. The University prohibits smoking in all University buildings, including the use of e-cigarettes.

8. Misuse or damage of University property is prohibited. Charges will be assessed against those responsible for damaging or misusing University property.

9. If applicable, the Program must adopt and implement rules and regulations for proper supervision of Minors in University housing. The following must be included:

   a. A curfew time which is age-appropriate for the Minors, but in no case shall curfew be later than midnight.

   b. In-room visitation to be restricted to participants of the same gender.

   c. Guests of participants (other than a parent/legal guardian and other Program participants) may visit only in the building lobby and/or floor lounges, and only during approved hours specified by the Program.

   d. The Program must comply with all security measures and procedures specified by the Office of Residence Life and the Department of Public Safety.

   e. Pre-enrollment visitation Programs for high school students housed overnight in residence halls must be registered with the Office of Residence Life.

10. Program Directors, including the Office of Conference Services, may have additional Rules and Disciplinary Measures applicable to Programs for Minors at their option.

   J. Reporting Suspected Abuse
All Adults who suspect or know of child abuse or neglect must report in accordance with the Villanova University Child Abuse Reporting Policy. The Reporting Policy is attached as Appendix D to this Policy and is also included as a link in the required training materials.

Where an instance of known or suspected abuse or neglect is encountered during participation in a Program sponsored by a third party at an off-campus location, Adults must also report such known or suspected child abuse or neglect to the Department of Human Services and to the individual designated by the third-party Program to receive these reports. The reporting obligation also applies to abuse of a Villanova University student or employee under the age of 18.

K. Allegations of Inappropriate Conduct; Incomplete or Adverse Background Check Results

If an allegation of inappropriate conduct has been made against an Adult participating in a Program, he or she shall discontinue any further participation in the Program until such allegation has been resolved to the University’s satisfaction. It is the Program Director’s responsibility to ensure that the Adult’s participation in the Program ceases as soon as the Program Director becomes aware of such an allegation.

In the event that a Program Director is informed by the HR-Employee Relations/Compliance Director or the University Compliance Office that an Adult employee or volunteer has not timely provided all required background checks or has adverse background check results that exclude such Adult from participation in a Program, the Program Director must immediately notify the affected Adult and exclude such Adult from participation in all Programs for which the Program Director has responsibility. Likewise, if the Program Director becomes aware that any Adult appears on the Pennsylvania State Police Megan's Law registry at http://www.pameganslaw.state.pa.us/ or the federal national sex offender registry at www.nsopw.gov, the Program Director must exclude such Adult from participation in all Programs for which the Program Director has responsibility and must notify HR-Employee Relations/Compliance Director (for a University employee) or the University Compliance Office (for a non-University employee) of the appearance of that Adult on the Pennsylvania State Police Megan's Law registry or the federal national sex offender registry.

If a Program Director knows or suspects that an Adult who participates in any Program for which the Program Director has responsibility has been arrested or charged with a crime, the Program Director must immediately notify and consult with the HR-Employee Relations/Compliance Director (for University employees) or the University Compliance Office (for non-University employees) and facilitate any related additional background checks or other investigation.

L. Evidence of Compliance
Program Directors of non-University Programs using Villanova Facilities via arrangements with Conference Services must provide appropriate executed agreements to Conference Services at least thirty (30) days prior to the scheduled use of University Facilities. Program Directors of non-University Programs using Villanova Facilities outside of the scope of Conference Services must provide appropriate executed agreements to Risk Management and Insurance. The University Compliance Officer or designee may audit the records and protocols of non-University Programs using Villanova Facilities to ensure adherence to the contractual and University policy requirements.

Program Directors of University sponsored Programs, as well as athletic camps owned and operated by Villanova coaches, must provide satisfactory evidence of compliance with all requirements of this Policy. This includes: participant waiver forms signed by the parent or guardian of each Minor, background check results for all Adults with Significant Contact with Minors, signed youth protection training certification forms for all Adults participating in Programs serving Minors, the Certificate of Achievement or Transcript evidencing completion of the online course from the EduRisk Learning website for Adults with Significant Contact with Minors, and Criminal Information Update Certifications for Villanova employee Adults.

Required documentation (other than clearances of Villanova employee Adults) must be uploaded by the Program Director onto the Online Registration System for Minors and Youth Programs, available through the University Compliance Office website. The Program Director must submit all required documentation pertaining to University employees training documentation and Criminal Information Update Certifications to the HR-Employee Relations/Compliance Director.

Please note that the background clearance requirements may apply in the instance of University sponsored programs and/or research activities that involve the participation of minors. The University Compliance Office and Office of the General Counsel are available to answer questions that the Principal Investigators/Key Personnel may have in connection with such sponsored programs and/or research activities.
APPENDICES

APPENDIX A  Signs of Child Abuse and Neglect
APPENDIX B  Training Requirements
APPENDIX C  Criminal Information Update Certification for Villanova Employees with Significant Contact with Minors
APPENDIX D  Child Abuse Reporting Policy
APPENDIX A

SIGNS OF CHILD ABUSE AND NEGLECT

NEGLECT occurs when parents or caretakers do not provide proper supervision, control, subsistence, or education as required by law, or other care necessary for healthy development. By itself, lack of financial means to provide for a child is not neglect.

Physical signs may include:
- Poor hygiene.
- Inappropriate or ill-fitting clothing.
- Being left alone or with people unable to provide proper supervision.
- Obvious lack of necessary medical treatment.

Behavioral signs may include:
- Chronic hunger or sleepiness.
- Delayed language development.
- Clinging behavior or development of indiscriminate attachments.
- Frequent complaints of feeling unwell.
- Frequent tardiness or absence from school.

PHYSICAL ABUSE is non-accidental injury of a child by a parent or caretaker.

Physical signs may include:
- Bruises, welts or swelling.
- Sprains or broken bones.
- Burns.
- Lacerations or abrasions.
- Bite marks.
- Unexplained or repeated injuries.

Behavioral signs may include:
- Attempts to hide injuries.
- Difficulty sitting or walking.
- Wariness of physical contact with adults.
- Reluctance to go home.
- Depression or self-mutilation.
- Fear of parent(s) or caregiver(s).

SEXUAL ABUSE is exploitation of a child for the sexual gratification of an adult or older child.

Physical signs may include:
- Difficulty walking or sitting.
- Torn, stained, or bloody clothing.
- Genital pain or itching.
- Sexually transmitted diseases.
- Pregnancy.

Behavioral signs may include:
- Precocious sexual knowledge or behavior.
- Extremely hostile and aggressive or fearful or withdrawn.
- Self-mutilation.
- Substance abuse.
- Running away.
APPENDIX B

TRAINING

Training Requirements for Adults Involved with Minors:
Overview for Program Directors

Program Directors are responsible for providing training to Adults who are involved in their Programs. Programs Directors are also responsible for collecting signed Youth Protection Training Certification forms for all Adults, and the Certificate of Achievement or Transcript evidencing completion of the online course from the EduRisk Learning website for Adults with Significant Contact with Minors.

Training certificates must be uploaded onto the online registration system as part of the Program registration process. If, for any reason, this is not feasible, then training documentation for Villanova employees must be submitted to HR-Employee Relations/Compliance Director. Training documentation for Non-University Employee Adults must be submitted to the University Compliance Office.

Who Must Receive Training?

Any Adult participating in a Program. The term "Adult" includes enrolled Villanova students.

What Are the Training Requirements?

Villanova requires two types of training. One is a packet of training materials entitled Working with Minors: Training for Adults Participating in University Programs Involving Minors.

The second type is online training. We use the Higher Education version of the free, online course Protecting Children from Sexual Misconduct: How Teachers and Other Educators Can Protect Our Children. The course includes modules for (1) awareness, (2) boundaries, (3) codes of conduct, and (4) reporting. It takes about 60 minutes to complete.

Adult Volunteers who have successfully completed the Archdiocese of Philadelphia’s training titled “Protecting God’s Children” within the prior 60 months may submit proof of their successful completion of this program within the prior 60 months in lieu of completion of the EduRisk Learning program described above.

Who Receives Each Type of Training?

All Adults who are members of the Villanova community, including employees, students, and volunteers, who will have Significant or Incidental Contact with Minors must read the Youth Protection Training Packet at least every two years, and sign the Youth Protection Training
Certification form to acknowledge that they have read the information, understood it, and had the opportunity ask questions.

All Adults in the Villanova community who have Significant Contact with Minors must also complete the online training during calendar year 2015 and renew this training every 60 months. The Adult must provide the Certificate of Achievement or Transcript from the EduRisk Learning website (available after completing the course), to the Program Director. Adult Volunteers who have successfully completed the Archdiocese of Philadelphia’s training titled “Protecting God’s Children” within the prior 60 months may submit proof of their successful completion of this program within the prior 60 months in lieu of completion of the EduRisk Learning program described above.

**How Can I Access the Online Course?**

1. Click on the link, [www.edurisklearning.org](http://www.edurisklearning.org)

2. First time users and anyone who registered prior to January 1, 2014 should select the link to create a new account on the right side of the screen.
   a. Complete all of the required fields.
      i. User name: Must be your full Villanova email address (if applicable).
      ii. Email: Must be your full Villanova email address (if applicable).
      iii. Institution Code: 0075-SC37-XY12
      iv. Employee ID and Student ID: Enter your Banner ID, if you know it, in the appropriate field. The other fields can be left blank.

3. You will receive an email with your temporary password. Please use this password to login. You will then be directed to create a new password.

4. Choose “Get Started” under Protecting Children from Sexual Misconduct.


**I run an Athletic Camp. What Training Requirements Apply to My Camp?**

The training requirements for Villanova sponsored Programs, described above, also apply to athletic camps owned and operated by Villanova coaches.

**I run a Third-Party Program in Villanova Facilities. It’s Not an Athletic Camp, and the University Does Not Sponsor It. What Training Must I Provide?**

Refer to your written contract with Villanova. It requires you to certify that you provide suitable training to your staff and volunteers on the protection of Minors. Your training must be at least as comprehensive as the training that Villanova provides to members of the University community who interact with Minors.
VILLANOVA UNIVERSITY YOUTH PROTECTION TRAINING PACKET

Working with Minors:
Training for Adults Participating in University Programs Involving Minors

The Villanova University community takes a strong interest in how our society cares for children and the most vulnerable among us. We seek to promote the safety of children and adolescents and prevent their victimization. To further this goal, this packet contains important information that you must review if you are participating in a program or activity involving minors that

(1) the University operates;
(2) others operate in University facilities; or
(3) Villanova students, faculty, or staff are involved with in the community.

You are receiving this information because you have been identified as participating in a covered program or activity. You must review the information in this packet and return the attached Youth Protection Training Certification form. It indicates that you have read the packet and agree to comply with the requirements it describes. You may also be required to review additional materials that are relevant to your specific situation.

This informational packet contains the following:

1. Guidelines for working with minors that will help you to maintain safe and positive interactions and reduce the risk of mistaken allegations;

2. Steps to take if you suspect that a minor has been abused or neglected or is otherwise unsafe, including information about how to report your suspicions or ask questions, and a link to Villanova University’s Child Abuse Reporting Policy;

3. Advice on the signs of child abuse and neglect;

4. An acknowledgement form that you must sign to certify that you have read and understood the information and will comply with your obligations.
GUIDELINES FOR WORKING WITH MINORS

Those associated with programs or activities involving minors should observe the following “dos” and “don’ts” in order to maintain a safe and positive experience for program participants, encourage parental confidence, and avoid mistaken allegations.

DO:
- Maintain the highest standards of personal behavior at all times when interacting with minors.
- Listen to and interact with minors and provide appropriate praise and positive reinforcement.
- Treat all minors in a group consistently and fairly, and with respect and dignity.
- Be friendly with minors within the context of the formal program or activity while maintaining appropriate boundaries.
- Maintain discipline and discourage inappropriate behavior by minors, consulting with your supervisors if you need help with misbehaving youth.
- Be aware of how others might perceive or misinterpret your actions and intentions.
- Consult with other adult supervisors or colleagues when you feel uncertain about a situation.

DON’T:
- Be alone with a minor. If one-on-one interaction is necessary (“Significant Contact with Minors” Program), the interaction must take place in an area visible to others to ensure there is no opportunity for privacy.
- Have any direct electronic and/or social media contact with minors, unless it is related to the program and another adult is included in the communication. (This provision does not apply to Athletic recruiting).
- Have contact with a minor outside of the program (e.g., babysitting, home visits).*
- Enter a facility in use by a minor such as a bathroom, locker room, residence hall room (if applicable), or similar area without another adult present, consistent with the policy of avoiding one-on-one contact with minors.*
- Engage in abusive conduct of any kind toward, or in the presence of, a minor.
- Hit, physically assault, or inappropriately touch minors; use language, make suggestions, or offer advice which is inappropriate, offensive or abusive; behave in a manner that is sexually provocative; act in ways intended to shame, humiliate, belittle or degrade minors; or otherwise perpetrate any form of emotional abuse.
- Drive with a minor in a University vehicle and/or a personal vehicle (e.g. pick up minors from or drop off minors at their homes or transport them to and from off campus activities). Note adults may transport prospective student athletes in conjunction with campus visits (e.g., to and from airport, to and from University sporting events) as long as the adult is never alone with a minor. In addition, minors may be transported by Public Safety in University vehicles and VEMS via ambulance as needed.
- Provide alcohol or illegal drugs to any minor or facilitate the minor’s presence at an event where there is underage consumption of alcohol or use of illegal drugs. Adults shall not provide prescription or over-the-counter medication to any minor unless specifically authorized in writing by the parent or legal guardian as being required for the minor’s care or the minor’s emergency treatment.
- Make sexual materials in any form available to minors or assist them in any way in gaining access to such materials.
- Engage in inappropriate conversations with minors that are sexual in nature.
- Take photos or videos of a minor with personal cell phones, cameras or similar devices in showers, locker rooms, restrooms or other areas where privacy is expected.
- Give gifts to minors independent of gifts provided by the Program.
* These two guidelines do not apply to pre-enrollment visits by high school students, including prospective student athletes, hosted by University students.
# SIGNS OF CHILD ABUSE AND NEGLECT

**NEGLECT** occurs when parents or caretakers do not provide proper supervision, control, subsistence, education as required by law, or other care necessary for healthy development. By itself, lack of financial means to provide for a child is not neglect.

<table>
<thead>
<tr>
<th>Physical signs may include:</th>
<th>Behavioral signs may include:</th>
</tr>
</thead>
<tbody>
<tr>
<td>• Poor hygiene.</td>
<td>• Chronic hunger or sleepiness.</td>
</tr>
<tr>
<td>• Inappropriate or ill-fitting clothing.</td>
<td>• Delayed language development.</td>
</tr>
<tr>
<td>• Being left alone or with people unable to provide proper supervision.</td>
<td>• Clinging behavior or development of indiscriminate attachments.</td>
</tr>
<tr>
<td>• Obvious lack of necessary medical treatment.</td>
<td>• Frequent complaints of feeling unwell.</td>
</tr>
<tr>
<td>• Frequent tardiness or absence from school.</td>
<td></td>
</tr>
</tbody>
</table>

**PHYSICAL ABUSE** is non-accidental injury of a child by a parent or caretaker.

<table>
<thead>
<tr>
<th>Physical signs may include:</th>
<th>Behavioral signs may include:</th>
</tr>
</thead>
<tbody>
<tr>
<td>• Bruises, welts or swelling.</td>
<td>• Attempts to hide injuries.</td>
</tr>
<tr>
<td>• Sprains or broken bones.</td>
<td>• Difficulty sitting or walking.</td>
</tr>
<tr>
<td>• Burns.</td>
<td>• Wariness of physical contact with adults.</td>
</tr>
<tr>
<td>• Lacerations or abrasions.</td>
<td>• Reluctance to go home.</td>
</tr>
<tr>
<td>• Bite marks.</td>
<td>• Depression or self-mutilation.</td>
</tr>
<tr>
<td>• Unexplained or repeated injuries.</td>
<td>• Fear of parent(s) or caregiver(s).</td>
</tr>
</tbody>
</table>

**SEXUAL ABUSE** is exploitation of a child for the sexual gratification of an adult or older child.

<table>
<thead>
<tr>
<th>Physical signs may include:</th>
<th>Behavioral signs may include:</th>
</tr>
</thead>
<tbody>
<tr>
<td>• Difficulty walking or sitting.</td>
<td>• Precocious sexual knowledge or behavior.</td>
</tr>
<tr>
<td>• Torn, stained, or bloody clothing.</td>
<td>• Extreme – hostile and aggressive or fearful or withdrawn.</td>
</tr>
<tr>
<td>• Genital pain or itching.</td>
<td>• Self-mutilation.</td>
</tr>
<tr>
<td>• Sexually transmitted diseases.</td>
<td>• Substance abuse.</td>
</tr>
<tr>
<td>• Pregnancy.</td>
<td>• Running away.</td>
</tr>
</tbody>
</table>
HOW TO REPORT CONCERNS AND SUSPICIONS

During your contact with minors, you may notice signs of possible abuse or neglect. A minor may tell you something suggesting that he or she has been abused. You may witness someone engaging in behavior listed above under the Don’ts.

You should take action and make a report if you reasonably suspect a minor may have been abused or neglected. You do not need definite proof. Resolve any doubts about reporting in favor of making a report.

Under Pennsylvania law, the following members of the Villanova community have a duty to report suspected child abuse:

- **Villanova employees** – All full, part-time and temporary faculty and staff who come into direct contact with a child as part of their employment with Villanova.
- **Villanova students and volunteers** – Those members of the community who accept responsibility for a child as an integral part of a program, activity or service sponsored by Villanova. This includes all Villanova students and volunteers, whether paid or unpaid, participating in service programs, athletic or other camp programs, outreach and enrichment programs, or other programs associated with Villanova that involve contact with children.
- **Clergy** - Priests and other spiritual leaders of a regularly established church or other religious organization.¹
- **Independent contractors** – Those individuals who provide services to the University relating to the care, supervision, guidance or control of a child and who have direct contact with a child in such role.

To make a report, take the following steps:

**First,** immediately report the information to the Department of Human Services (“DHS”). As a mandated reporter you have the option of either reporting the information electronically at https://www.compass.state.pa.us/cwis/public/home or calling ChildLine toll-free at (800) 932-0313. When making a report electronically, print a copy of the completed report to submit to the institution as directed in the second step below. If an oral report is made to ChildLine, a written report must also be completed via the attached CY47 Report of Suspected Child Abuse form and sent to the county children and youth agency within 48 hours (for a directory of county and youth agencies in Pennsylvania please refer to http://www.dhs.pa.gov/citizens/findfacilsandlocs/countychildrenandyouthdirectory/). If a report is made electronically, a follow up written report is not required. For your report, you are not expected to investigate or gather any information you do not already know. The role of investigation lies with DHS and/or law enforcement.

**Second,** immediately after your first notification to DHS, you must report the suspected child abuse to Villanova’s Director of Public Safety and Chief of Police. Contact Information: Phone – (610) 519-6982; email – david.tedjeske@villanova.edu. If for some reason you are unable or prefer not to contact the Director of Public Safety and Chief of Police, contact the Executive Vice President. Contact information: (610) 519-4532; email – ken.valosky@villanova.edu. The President of the University has designated these officials to receive these reports on behalf

¹Excluding confidential reports to a member of the clergy who has received the information in a manner protected by Pennsylvania law.
of the institution. The designated official will then have the obligation to facilitate the cooperation of the institution with the investigation of the report and maintain records of all reports made. You must also send a copy of the reporting form you submit to DHS to the Director of Public Safety and Chief of Police or the Executive Vice President. The reporting form will either be a copy of the electronic submission, which is available on your Child Welfare Portal account, or a copy of the CY47 form.

**Third.** if you are a University employee and also a certified medical professional or other licensed or certified professional with additional reporting obligations, you must comply with any concurrent obligation to directly report injuries caused by suspected child abuse to the local or state police.

**Fourth.** after you have finished making these reports, you are encouraged, but not required, to report the information to your immediate supervisor. For Athletics Staff, you are also encouraged to report the information to the Director of Athletics.
# REPORT OF SUSPECTED CHILD ABUSE

(Child Protective Service Law - Title 23 PA CSA Chapter 63)

**PLEASE REFER TO INSTRUCTIONS ON REVERSE SIDE. EXCEPT FOR SIGNATURE, PLEASE PRINT OR TYPE**

<table>
<thead>
<tr>
<th></th>
<th>NAME OF CHILD (Last, First, Initial)</th>
<th>SSN</th>
<th>BIRTHDATE</th>
<th>SEX</th>
<th>ADDRESS (State, City, State &amp; ZIP Code)</th>
<th>COUNTY</th>
</tr>
</thead>
<tbody>
<tr>
<td>1.</td>
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<td></td>
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<tr>
<td></td>
<td><strong>1A. PRESENT LOCATION IF DIFFERENT THAN ABOVE</strong></td>
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<tr>
<td>2.</td>
<td>BIOLOGICAL/ADOPTIVE MOTHER (Last, First, Initial)</td>
<td>SSN</td>
<td>BIRTHDATE</td>
<td>TELEPHONE NO.</td>
<td>ADDRESS (City, State &amp; ZIP Code)</td>
<td>COUNTY</td>
</tr>
<tr>
<td>3.</td>
<td>BIOLOGICAL/ADOPTIVE FATHER (Last, First, Initial)</td>
<td>SSN</td>
<td>BIRTHDATE</td>
<td>TELEPHONE NO.</td>
<td>ADDRESS (City, State &amp; ZIP Code)</td>
<td>COUNTY</td>
</tr>
<tr>
<td>4.</td>
<td>OTHER PERSON RESPONSIBLE FOR CHILD</td>
<td>SSN</td>
<td>BIRTHDATE</td>
<td>RELATIONSHIP TO CHILD</td>
<td>SEX</td>
<td>ADDRESS (City, State &amp; ZIP Code)</td>
</tr>
<tr>
<td>5.</td>
<td>ALLEGED PERPETRATOR (Last, First, Initial)</td>
<td>SSN</td>
<td>BIRTHDATE</td>
<td>RELATIONSHIP TO CHILD</td>
<td>SEX</td>
<td>ADDRESS (City, State &amp; ZIP Code)</td>
</tr>
</tbody>
</table>

**NAME OF ALLEGED PERPETRATOR’S EMPLOYER AND EMPLOYER’S ADDRESS**

<table>
<thead>
<tr>
<th></th>
<th>FAMILY HOUSEHOLD COMPOSITION (Excluding Above Names)</th>
<th>RELATIONSHIP TO CHILD</th>
<th>NAME (Last, First, Initial)</th>
<th>RELATIONSHIP TO CHILD</th>
</tr>
</thead>
<tbody>
<tr>
<td>A.</td>
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<td></td>
</tr>
<tr>
<td>B.</td>
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<tr>
<td>C.</td>
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<tr>
<td>D.</td>
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<tr>
<td>E.</td>
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<tr>
<td>F.</td>
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</tbody>
</table>

**ADDRESS WHERE THE SUSPECTED ABUSE OCCURRED**

<table>
<thead>
<tr>
<th></th>
<th>ADDRESS WHERE THE SUSPECTED ABUSE OCCURRED</th>
<th>COUNTY</th>
</tr>
</thead>
</table>

**DESCRIBE THE NATURE AND EXTENT OF THE SUSPECTED CHILD ABUSE, INCLUDING ANY EVIDENCE OF PRIOR ABUSE TO THE CHILD OR ANY SIBLING OF THE CHILD. ALSO INCLUDE ANY EVIDENCE OF PRIOR ABUSE BY THE ALLEGED PERPETRATOR(S) TO OTHER CHILDREN. PLEASE NOTE EXACT LOCATION OF THE INJURY(S) ON MODEL BELOW.**

**DATE OF INCIDENT**

---

**Model**

- [Model of human body parts including hands and feet]
### 7. Actions Taken or About to Be Taken by the Person Making the Report:

<table>
<thead>
<tr>
<th>Action</th>
<th>Marked</th>
</tr>
</thead>
<tbody>
<tr>
<td>Notification of Coroner or Medical Examiner</td>
<td></td>
</tr>
<tr>
<td>X-rays</td>
<td></td>
</tr>
<tr>
<td>Photographs</td>
<td></td>
</tr>
<tr>
<td>Hospitalization</td>
<td></td>
</tr>
<tr>
<td>Police Notified</td>
<td></td>
</tr>
<tr>
<td>Medical Test(s)</td>
<td></td>
</tr>
<tr>
<td>Taken into Protective Custody</td>
<td></td>
</tr>
<tr>
<td>Other (Specify)</td>
<td></td>
</tr>
</tbody>
</table>

### 8. Safety Concerns and Risk Factors:

#### A.
Describe the child(ren)’s physical and behavioral health, good mood and temperament. Describe child(ren)’s intellectual functioning, communication and social skills, school performance and peer relations. Include whether the child(ren) has expressed any suicidal/homicidal ideation or plans.

#### B.
Describe how the adult caregivers function cognitively, emotionally, behaviorally, physically and socially. Include whether the adults have any mental health, substance use issues and/or criminal history. Document any past or present domestic violence. Record the employment status/source of income and whether there are any financial stressors in the home. Include any safety or sanitary concerns regarding the conditions of the home and whether there are working utilities. What is the primary language of the household?

#### C.
Describe whether the caregivers have the appropriate knowledge, expectations and skills to parent the child(ren) adequately. Does the caregiver adequately supervise the child(ren)? Are they willing and able to protect the child(ren)? Describe the ability of the caregiver to empathize, nurture and advocate for the child(ren).

#### D.
Describe the caregivers’ approach/methods of disciplining the child(ren). Describe when discipline occurs and whether disciplinary methods are age-appropriate? Are there any cultural practices in the home that would influence the disciplinary methods used?

#### E.
Please provide any additional information relevant to the investigation process that has not already been entered in this referral. This may include additional addresses to locate the child or perpetrator, additional resources for the child, email addresses, information about any weapons in the home or concerns you may have for the caseworker’s safety.

### Instructions to Mandated Persons:
A mandated reporter making an oral report of suspected child abuse to the department via the Statewide toll-free telephone number (800-932-0313) must also make a written report, which may be submitted electronically, within 48 hours to the department or county agency assigned to the case by using this form. If needed, attach additional sheet(s) of paper to provide all of the requested information on this form.

### Note:
If the child has been taken into custody, you must immediately contact the county children and youth agency where the abuse occurred.

### Reporting Source:

<table>
<thead>
<tr>
<th>Printed Name and Signature:</th>
<th>Date of Report:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Address:</td>
<td></td>
</tr>
</tbody>
</table>

| Title or Relationship to Child: | Facility or Organization: | Telephone Number: | Email Address: |
YOUTH PROTECTION TRAINING CERTIFICATION

I hereby certify that I have read and understand the foregoing Working with Minors: Training for Adults Participating in University Programs Involving Minors. I have had an opportunity to raise any questions I have about this information with the Program Director, and have done so if necessary.

I agree to comply with all of the guidelines in Working With Minors: Training for Adults Participating in University Programs Involving Minors and also with the University’s Child Abuse Reporting Policy.

I certify that I have never been convicted of a crime related to the abuse or neglect of minors or entered a guilty plea or other plea associated with a crime related to the abuse or neglect of minors.

I also certify that no one has ever alleged that I have abused or neglected a child.

_________________________________________  ________________
Signature                                         Date

__________________________________________
Printed Name

Program/Activity in which you are participating:

__________________________________________
APPENDIX C

CRIMINAL INFORMATION UPDATE CERTIFICATION FOR VILLANOVA EMPLOYEES WITH SIGNIFICANT CONTACT WITH MINORS

Please answer the following questions truthfully by checking the appropriate boxes.

<table>
<thead>
<tr>
<th>Question</th>
<th>Yes</th>
<th>No</th>
</tr>
</thead>
<tbody>
<tr>
<td>1. Have you undergone a PA required criminal background check within the past sixty (60) months?</td>
<td></td>
<td></td>
</tr>
<tr>
<td>2. Since the date of your most recent criminal background check, have you been arrested?</td>
<td></td>
<td></td>
</tr>
<tr>
<td>If yes, please explain below.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>3. Since the date of your most recent criminal background check, have you been convicted of a crime or entered a plea of guilty, nolo contendere or similar plea that exposed you to the possibility of punishment?</td>
<td></td>
<td></td>
</tr>
<tr>
<td>If yes, please explain below.</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Explain:

**Individual Consideration:** Disclosure of an arrest, conviction, or plea will not immediately disqualify you. Each situation is examined individually.

**Continuing Duty to Disclose:** You must disclose to your Program Director within 72 hours all future arrests, convictions, and pleas that subject you to the possibility of punishment.

**Certification:** I certify that I have completed this form truthfully. I understand that my answers may be subject to independent verification. I understand that I have a continuing duty to disclose within 72 hours any future arrests, convictions, or pleas that may subject me to punishment.

Signed: _________________________ Print Name: _______________________

Date: _________________________
APPENDIX D:
Villanova University Child Abuse Reporting Policy

(Please see next page)
I. PURPOSE

This Policy is designed to educate Villanova University community members regarding the requirements under Pennsylvania law for reporting suspected cases of child abuse. This Policy explains under what circumstances suspected child abuse must be reported and the process for reporting.

This Policy is not intended to replace procedures for responding to or reporting imminent danger to a child, an emergency or crime in progress. In the event of imminent danger to a child, an emergency or a crime in progress, you should contact Villanova’s Public Safety (610) 519-4444, or call the local police (911) if occurring off-campus, and then follow the procedures for reporting suspected child abuse in this Policy.

Villanova University is committed to the protection and safety of minors. In evaluating an incident of suspected abuse, the safety and welfare of the child is paramount. Any uncertainty about whether reporting is required should always be resolved in favor of making a report.

II. SCOPE

Who Must Report
The following members of the Villanova community are mandated reporters in that they have a duty to report suspected child abuse, as outlined below:

- **Villanova employees** – All full, part-time and temporary faculty and staff who come into direct contact with a child as part of their employment with Villanova.
- **Villanova students and volunteers** – Those members of the community who accept responsibility for a child as an integral part of a program, activity or service sponsored by Villanova. This includes all Villanova students and volunteers, whether paid or unpaid, participating in service programs, athletic or other camp programs, outreach and enrichment programs, or other programs associated with Villanova that involve contact with children.
- **Clergy** - Priests and other spiritual leaders of a regularly established church or other religious organization.\(^1\)
- **Independent contractors** – Those individuals who provide services to the University relating to the care, supervision, guidance or control of a child and who have direct contact with a child in such role.

### III. DEFINITIONS

**Definition of Child Abuse\(^2\)**

The term "child abuse" means intentionally, knowingly or recklessly doing any of the following:

1. Causing bodily injury to a child through any recent act or failure to act.
2. Fabricating, feigning or intentionally exaggerating or inducing a medical symptom or disease which results in a potentially harmful medical evaluation or treatment to the child through any recent act.
3. Causing or substantially contributing to serious mental injury to a child through any act or failure to act or a series of such acts or failures to act.
4. Causing sexual abuse or exploitation of a child through any act or failure to act.
5. Creating a reasonable likelihood of bodily injury to a child through any recent act or failure to act.
6. Creating a likelihood of sexual abuse or exploitation of a child through any recent act or failure to act.

---

1 Excluding confidential reports to a member of the clergy who has received the information in a manner protected by Pennsylvania law.

2 23 Pa. C.S. §6303(b.1)
(7) Causing serious physical neglect of a child.

(8) Engaging in any of the following recent acts:

(i) Kicking, biting, throwing, burning, stabbing or cutting a child in a manner that endangers the child.

(ii) Unreasonably restraining or confining a child, based on consideration of the method, location or the duration of the restraint or confinement.

(iii) Forcefully shaking a child under one year of age.

(iv) Forcefully slapping or otherwise striking a child under one year of age.

(v) Interfering with the breathing of a child.

(vi) Causing a child to be present at a location while a violation of 18 Pa.C.S. § 7508.2 (relating to operation of methamphetamine laboratory) is occurring, provided that the violation is being investigated by law enforcement.

(vii) Leaving a child unsupervised with an individual, other than the child's parent, who the actor knows or reasonably should have known:

(A) Is required to register as a Tier II or Tier III sexual offender under 42 Pa.C.S. Ch. 97 Subch. H (relating to registration of sexual offenders), where the victim of the sexual offense was under 18 years of age when the crime was committed.

(B) Has been determined to be a sexually violent predator under 42 Pa.C.S. § 9799.24 (relating to assessments) or any of its predecessors.

(C) Has been determined to be a sexually violent delinquent child as defined in 42 Pa.C.S. § 9799.12 (relating to definitions).

(9) Causing the death of the child through any act or failure to act.

IV. POLICY STATEMENT

What Must I Report

In general, reportable child abuse encompasses intentional or reckless actions or omissions that cause, or are reasonably likely to cause: bodily injury, death or serious mental injuries to a child; sexual abuse/sexual exploitation of a child; or serious physical neglect of a child. A “child” is any individual under 18 years of age, which may include certain Villanova students.

When, in connection with your work or volunteer service for Villanova, you reasonably suspect an act of child abuse, you must report it. You must report child abuse you actually know about, see or have a
reasonable cause to suspect based on your own observations or knowledge, or based on information shared with you by the child or any other individual about an identifiable child.

V. PROCEDURE

How Do I Report

If you see, know of or suspect child abuse, you must act immediately by making a report to the appropriate state authorities. In deciding whether or not to report, you are not required to have proof that abuse has occurred. Any uncertainty in deciding to report suspected abuse should be resolved in favor of making a report.

To make a report, take the following steps:

First, immediately report the information to the Department of Human Services (“DHS”). As a mandated reporter you have the option of either reporting the information electronically at https://www.compass.state.pa.us/cwis/public/home or calling ChildLine toll-free at (800) 932-0313. When making a report electronically, print a copy of the completed report to submit to the institution as directed in the second step below. If an oral report is made to ChildLine, a written report must also be completed via the attached CY47 Report of Suspected Child Abuse form and sent to the county children and youth agency within 48 hours (for a directory of county and youth agencies in Pennsylvania please refer to http://www.dhs.pa.gov/citizens/findfacilsandlocs/countychildrenandyouthdirectory/). If a report is made electronically, a follow up written report is not required. For your report, you are not expected to investigate or gather any information you do not already know. The role of investigation lies with DHS and/or law enforcement.

Second, immediately after your first notification to DHS, you must report the suspected child abuse to Villanova’s Director of Public Safety and Chief of Police. Contact Information: Phone – (610) 519-6982; email – david.tedjeske@villanova.edu. If for some reason you are unable or prefer not to contact the Director of Public Safety and Chief of Police, contact the Executive Vice President. Contact information: (610) 519-4532; email – ken.valosky@villanova.edu. The President of the University has designated these officials to receive these reports on behalf of the institution. The designated official will then have the obligation to facilitate the cooperation of the institution with the investigation of the report and maintain records of all reports made. You must also send a copy of the reporting form you submit to DHS to the Director of Public Safety and Chief of Police or the Executive Vice President. The reporting form will either be a copy of the electronic submission, which is available on your Child Welfare Portal account, or a copy of the CY47 form.
Third, if you are a University employee and also a certified medical professional or other licensed or certified professional with additional reporting obligations, you must comply with any concurrent obligation to directly report injuries caused by suspected child abuse to the local or state police.

Fourth, after you have finished making these reports, you are encouraged, but not required, to report the information to your immediate supervisor. For Athletics Staff, you are also encouraged to report the information to the Director of Athletics.

Non-Villanova Programs

If you reasonably suspect child abuse independent of your role at Villanova – such as, for example, your connection with a children’s local community organization -- you are encouraged to report such abuse as a private citizen to the Department of Human Services (800-932-0313). If someone makes a specific disclosure to you that an identifiable child is the victim of child abuse, or if someone who is 14 or older tells you that he or she has committed child abuse, independent of your role at Villanova, you must report such abuse to the Department of Human Services (“DHS”) ChildLine either electronically (mandated reporters only) at [https://www.compass.state.pa.us/cwis/public/home](https://www.compass.state.pa.us/cwis/public/home) or by calling toll-free (800) 932-0313.

Prohibition on Discrimination or Retaliation in Employment

Any person who makes a good faith report of child abuse may not be subjected to discharge from employment or employment discrimination or retaliation on the basis of such report.

Penalties for Failure to Report

Failure by any member of the Villanova community to report information related to suspected child abuse in accordance with this Policy will result in disciplinary action up to and including termination for employees and dismissal for students. Pennsylvania law also imposes criminal penalties for a willful failure to comply with these state-mandated reporting requirements.

VI. RELATED INFORMATION/FORMS

[CY47 Report of Suspected Child Abuse form](#)

VII. HISTORY

Effective: 3/18/2013
Revised: 11/17/2014; 03/24/2015; 04/04/2017
VIII. RESPONSIBLE UNIVERSITY DIVISION/DEPARTMENT

University Compliance Officer
University Compliance Office
800 Lancaster Avenue
204 Tolentine Hall
Villanova, PA 19085

IX. RESPONSIBLE ADMINISTRATIVE OVERSIGHT

University Compliance Officer
University Compliance Office
800 Lancaster Avenue
204 Tolentine Hall
Villanova, PA 19085
REPORT OF SUSPECTED CHILD ABUSE  
(CHILD PROTECTIVE SERVICE LAW - TITLE 23 PA CSA CHAPTER 63)

PLEASE REFER TO INSTRUCTIONS ON REVERSE SIDE. EXCEPT FOR SIGNATURE, PLEASE PRINT OR TYPE

<table>
<thead>
<tr>
<th>1. NAME OF CHILD (Last, First, Initial)</th>
<th>SSN</th>
<th>BIRTHDATE</th>
<th>SEX</th>
<th>COUNTY</th>
</tr>
</thead>
<tbody>
<tr>
<td>ADDRESS (State, City, State &amp; ZIP Code)</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

1A. PRESENT LOCATION IF DIFFERENT THAN ABOVE

<table>
<thead>
<tr>
<th>2. BIOLOGICAL/ADOPTIVE MOTHER (Last, First, Initial)</th>
<th>SSN</th>
<th>BIRTHDATE</th>
<th>TELEPHONE NO.</th>
<th>COUNTY</th>
</tr>
</thead>
<tbody>
<tr>
<td>ADDRESS (City, State &amp; ZIP Code)</td>
<td></td>
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</tbody>
</table>

<table>
<thead>
<tr>
<th>3. BIOLOGICAL/ADOPTIVE FATHER (Last, First, Initial)</th>
<th>SSN</th>
<th>BIRTHDATE</th>
<th>TELEPHONE NO.</th>
<th>COUNTY</th>
</tr>
</thead>
<tbody>
<tr>
<td>ADDRESS (City, State &amp; ZIP Code)</td>
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<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>4. OTHER PERSON RESPONSIBLE FOR CHILD</th>
<th>SSN</th>
<th>BIRTHDATE</th>
<th>RELATIONSHIP TO CHILD</th>
<th>SEX</th>
<th>COUNTY</th>
<th>TELEPHONE NO.</th>
</tr>
</thead>
<tbody>
<tr>
<td>ADDRESS (City, State &amp; ZIP Code)</td>
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</tbody>
</table>

<table>
<thead>
<tr>
<th>5. ALLEGED PERPETRATOR (Last, First, Initial)</th>
<th>SSN</th>
<th>BIRTHDATE</th>
<th>RELATIONSHIP TO CHILD</th>
<th>SEX</th>
<th>COUNTY</th>
<th>TELEPHONE NO.</th>
</tr>
</thead>
<tbody>
<tr>
<td>ADDRESS (City, State &amp; ZIP Code)</td>
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</tbody>
</table>

NAME OF ALLEGED PERPETRATOR'S EMPLOYER AND EMPLOYER'S ADDRESS

6. FAMILY HOUSEHOLD COMPOSITION  
(Excluding Above Names)

<table>
<thead>
<tr>
<th>NAME (Last, First, Initial)</th>
<th>RELATIONSHIP TO CHILD</th>
<th>NAME (Last, First, Initial)</th>
<th>RELATIONSHIP TO CHILD</th>
</tr>
</thead>
<tbody>
<tr>
<td>A.</td>
<td></td>
<td>D.</td>
<td></td>
</tr>
<tr>
<td>B.</td>
<td></td>
<td>E.</td>
<td></td>
</tr>
<tr>
<td>C.</td>
<td></td>
<td>F.</td>
<td></td>
</tr>
</tbody>
</table>

ADDRESS WHERE THE SUSPECTED ABUSE OCCURRED

DESCRIBE THE NATURE AND EXTENT OF THE SUSPECTED CHILD ABUSE, INCLUDING ANY EVIDENCE OF PRIOR ABUSE TO THE CHILD OR ANY SIBLING OF THE CHILD. ALSO INCLUDE ANY EVIDENCE OF PRIOR ABUSE BY THE ALLEGED PERPETRATOR(S) TO OTHER CHILDREN. PLEASE NOTE EXACT LOCATION OF THE INJURY(S) ON MODEL BELOW.

DATE OF INCIDENT
7. ACTIONS TAKEN OR ABOUT TO BE TAKEN BY THE PERSON MAKING THE REPORT:

- Notification of Coroner or Medical Examiner
- X-Rays
- Photographs
- Hospitalization
- Police Notified
- Medical Test(S)
- Taken into Protective Custody
- Other (Specify)

8. SAFETY CONCERNS AND RISK FACTORS:

A. Describe the child(ren)'s physical and behavioral health, good mood and temperament. Describe child(ren)'s intellectual functioning, communication and social skills, school performance and peer relations. Include whether the child(ren) has expressed any suicidal/homicidal ideation or plans.

B. Describe how the adult caregivers function cognitively, emotionally, behaviorally, physically and socially. Include whether the adults have any mental health, substance use issues and/or criminal history. Document any past or present domestic violence. Record the employment status/source of income and whether there are any financial stressors in the home. Include any safety or sanitary concerns regarding the conditions of the home and whether there are working utilities. What is the primary language of the household?

C. Describe whether the caregivers have the appropriate knowledge, expectations and skills to parent the child(ren) adequately. Does the caregiver adequately supervise the child(ren)? Are they willing and able to protect the child(ren)? Describe the ability of the caregiver to empathize, nurture and advocate for the child(ren).

D. Describe the caregivers' approach/methods of disciplining the child(ren), describe when discipline occurs and whether disciplinary methods are age-appropriate? Are there any cultural practices in the home that would influence the disciplinary methods used?

E. Please provide any additional information relevant to the investigation process that has not already been entered in this referral. This may include additional addresses to locate the child or perpetrator, additional resources for the child, email addresses, information about any weapons in the home or concerns you may have for the caseworker's safety.

INSTRUCTIONS TO MANDATED PERSONS:

A mandated reporter making an oral report of suspected child abuse to the department via the Statewide toll-free telephone number (800-932-0313) must also make a written report, which may be submitted electronically, within 48 hours to the department or county agency assigned to the case by using this form. If needed, attach additional sheet(s) of paper to provide all of the requested information on this form.

NOTE:

If the child has been taken into custody, you must immediately contact the county children and youth agency where the abuse occurred.

REPORTING SOURCE:

Printed Name and Signature: ____________________________ Date of Report: ____________

Address: ____________________________

Title or Relationship to Child: ____________________________ Facility or Organization: ____________________________ Telephone Number: ____________________________ Email Address: ____________________________