

ADMINISTRATIVE DIVISION UNIV University Administration		POLICY NUMBER UNIV 4.00
POLICY TITLE Programs Involving Minors		
SCOPE OF POLICY USC System		DATE OF REVISION June 2, 2025
RESPONSIBLE OFFICER President		ADMINISTRATIVE OFFICE Office of the President

PURPOSE

This policy has been established to ensure appropriate supervision and protection of minors who participate in programs and activities sponsored by or operated by the University of South Carolina (University), regardless of location. This policy applies to:

- All programs operated by the University that are designed to serve minors, whether held on university premises, at non-University locations, or conducted virtually, aside from the exceptions noted below.
- All coach run programs as defined below
- All authorized individuals participating in the above programs for Minors.

This policy does not apply to public and other university sponsored programs where parents/guardians are expected to provide supervision of minors. Additional exclusions are:

- Minors receiving patient care in clinical spaces at USC medical facilities, which are subject to separate policies and procedures.
- Prospective student athlete visits to the university, which are subject to NCAA regulations.
- Minors employed by the university or by an external entity located at the university.

This policy shall supplement, not replace, any existing safety and security measures, policies, or codes of conduct currently in place or hereinafter enacted.

DEFINITIONS AND ACRONYMS

Abuse: any act that results in physical or emotional injury or creates a substantial risk of physical or emotional injury.

Custodial care: any situation in which an authorized person assumes temporary responsibility over a defined time period for the supervision of a Minor, for the purpose of the Minors engaging

in a youth program/activity.

Coach Run Programs: programs offered by coaches and other university personnel, including faculty and staff, acting as independent contractors. These programs operate under a contract with the university, allowing them to utilize university facilities, students, staff, or faculty to carry out their activities.

Direct Contact: includes any in-person, virtual, and electronic contact by an individual, whether paid or volunteer who has potentially unsupervised access to and involvement in the care, supervision, guidance, or control of minors in one or more programs, and regardless of location.

Minor(s)/Youth: anyone under the age of 18 years, who is not enrolled or accepted for enrollment at the university.

Programs: activities and events offered or sponsored by various academic or administrative units, and registered student organizations of the university. This includes, but is not limited to, outreach activities, workshops, sport camps, academic camps and programs, work in laboratories, volunteer opportunities and similar activities. Programs may take place on or off university premises or virtually.

Program Director: individual responsible for the management of a Program, whether that individual has another job or position title.

Program Staff: individuals paid or unpaid who interact directly or indirectly with, supervise, chaperone, or otherwise oversee minors in programs regardless of time duration. This includes but is not limited to faculty, staff, volunteers, graduate and undergraduate students, interns, employees of temporary employment agencies and independent contractors/consultants. The staff roles may include positions as counselors, chaperones, coaches, instructors, etc.

Sexual Misconduct: includes sexual assault, relationship violence, stalking, sexual exploitation, and sexual harassment (university definition and/or Title IX). See policy [CR 1.00 Policy Against Discrimination, Harassment & Sexual Misconduct](#).

Sponsoring Unit: an academic or administrative unit of the University which offers or sponsors a program.

Third Parties: individuals, organizations, or entities external to the university, to whom the university allows use of its facilities to operate a Program under a contractual agreement.

University Facilities: rounds owned, leased, operated, managed, or legally controlled by the

University.

POLICY STATEMENT

The University of South Carolina (“university”) is committed to providing a safe and healthy environment for all who participate in programs and activities sponsored or operated by the university. This Policy recognizes the special duty of care and supervision when working with **minors** and sets forth requirements to ensure compliance. Procedures required to comply with this policy are available at: [Programs Involving Minors - Office of the Provost | University of South Carolina](#)

All Programs to which this policy applies are expected to adhere to the below principles and follow the related procedures as specified in the accompanying documents:

A. Design for safety and alignment with university mission

1. Content and activities must align with the university’s mission with subject matter appropriate for program participants.
2. Program design must reflect safety considerations for all minors, identify potential hazards or risk before accidents or injuries occur. Prior to designing program activities, Program/Activity Directors must review the “Procedures for Designing and Operating Programs Involving Minors”.

B. Program registration and pre-approval

1. Each Program must be registered with the Office of Youth Protections not less than 30 days before the Program’s start date using the [Programs Involving Minors Registration Form](#). Recurring programs must be registered annually.
2. If minors will be working in university teaching and research laboratories, such programs must also be approved by the Environmental Health and Safety Office as required by the Policy on Minors in Laboratories.

C. Background investigation and screening of Program Staff

1. All Program Staff having direct contact with minors must have passed a background check no earlier than three years before beginning work with Youth. The Sponsoring Unit must follow the background check procedures through the Division of Human Resources as specified in policy HR 1.90 Background Screenings and Professional References.
2. If an individual has any prior allegations—whether substantiated or not—related to violence, sexual offenses, or any such offenses, the Program Director must consult with

and obtain approval from the Office of Youth Protection before the individual can be hired or permitted to work with Youth.

3. Program Staff must self-report any arrest, charge, or criminal conviction occurring after the date of the background check to their Program Director, prior to returning to a Program.
4. Depending on the nature of the Program, additional screening of Program Staff beyond background checks may be required, including in-person interviews and/or reference checks.
5. Program Directors must maintain documentation of background checks as required in the Document Retention section below.

D. Training

Program Directors must ensure all individuals who come into direct contact with minors are trained on their responsibilities related to the health, safety and security of Minors prior to the start of the Program and maintain training documentation and certifications as specified in the Records Retention section below.

This training should include, at a minimum:

1. A review of this policy UNIV4.00 Programs Involving Minors and the “Procedures for Designing and Operating Programs Involving Minors”,
2. Program Staff Code of Conduct,
3. Activities, risks, and responsibilities of the Program,
4. Intake and signing out procedures for Minors,
5. Working with Minors (including contact with parents/guardians, discipline, dealing with inappropriate or dangerous behavior),
6. Reporting of adverse events or concerns during the Program,
7. Disability accommodation and review and evaluation of special requests,
8. Emergency, safety and security protocols,

9. First aid guidelines and medication management, and
10. Transportation and housing protocols as appropriate.

E. Transportation

Regardless of distance, transportation must be by authorized staff only in university-obtained vehicles. All drivers must be certified and have proper clearance to operate a state vehicle transporting Minors. Minors under the age of eighteen (18) may not be transported in a 15-passenger van.

F. Records Retention

1. Programs must comply with all applicable laws, regulations, and university policies and procedures regarding the handling and storage of any documents, records, and/or files pertaining to Minors.
2. Records must be maintained for the duration of the Program plus seven years.
3. For records that are subject to statutory privacy rights including educational records, medical information, and personnel records, the sponsoring unit must seek assistance from the Office of the General Counsel, Office of Human Resources and/or Risk Management regarding maintaining, storing, and transmitting the records.

G. Consent, Authorization and Release

1. Appropriate disclosure, consent and release forms must be collected from parents/legal guardians of minors for participation in Program activities. This includes consent for transportation, overnight stays, photos and other media, field trips, hands-on activities in labs, shops, studios, or athletics facilities, where one on one contact between adults and minors could occur, and medical releases commensurate with the type of Program being offered.
2. Consent, liability waiver and release forms will be provided by the Office of Youth Protection, and the terms of these forms may not be altered.
3. All such forms must be completed before minors can participate in Program activities and be kept securely as required in the Records Retention section of this policy.

H. Appropriate supervision

All Programs for Minors must always ensure adequate supervision of Minors. Specifically:

1. The minimum required supervision ratios for the duration of the Program outlined in the Procedures related to this policy must always be met.
2. Private one-on-one contact between Program Staff and Minors are allowed in exceptional circumstances and must be justified and approved as part of the Program Registration process. Program Directors must provide specific protocols for supervision and follow any requirements for Youth protection outlined by the Office of Youth Protection.
3. If overnight stays are involved, rules and regulations for proper supervision of Minors in overnight accommodation must be established and included in the Program Registration request.

I. Safety during the Program

Program Staff must make all reasonable efforts to ensure the safety of Minors participating in programs covered by this policy.

1. Immediately remove Minors from dangerous or potentially dangerous situations, irrespective of any other limitation or requirement.
2. If a situation presents imminent danger or potential criminal activity toward a Minor, contact Campus Police Dispatch or 911 immediately.
3. Ensure that no Minor is released to any party other than the individual(s) listed in the written instructions provided by the Minor's parent/guardian on the applicable university form or application.
4. Ensure that access to emergency medical services at all Program locations is arranged and medical care appropriate for the nature of the events, expected attendance and other variables determined and implemented prior to the event.

J. Adverse event or suspected abuse reporting

Timely reporting and corrective actions related to adverse events including injuries, threatening or dangerous situations, and suspected or actual sexual misconduct are critical

to maintaining a safe environment for Minors in university programs. All university employees must appropriately report suspected abuse or misconduct with Minors. Do not attempt to investigate the matter further or gather additional information before reporting.

Depending on the type of adverse event, the following reporting is required:

1. **Emergencies:** For any medical emergencies, threats, suspected or actual violence or criminal activity, and follow up actions or potentially dangerous situations, first call 911 or Campus Police Dispatch.
2. **Injuries:** Inform the Program Director. Report using the adverse event reporting form at <https://go.sc.edu/minors>
3. **Suspected or disclosed Sexual Misconduct:** Any Program Staff who has reason to believe abuse has occurred, regardless of concrete proof, should immediately report the situation to **ALL** of the following:
 - a. Campus law enforcement or 911
 - b. The Office of Civil Rights & Title IX at sc.edu/civilrights; 803-777-3854; or civilrights@mailbox.sc.edu, and
 - c. The Program Director, and
To the Office of Youth Protections at https://universityofsouthcarolina-yrckc.formstack.com/forms/minors_program_incident_report These reports will be routed to the appropriate authorities for action.

Notes:

If an allegation of inappropriate conduct has been made against a Program Staff member, the staff member will be removed from direct involvement with Youth until such time that the allegation has been satisfactorily resolved. Any subsequent action including but not limited to removal from the Program will follow the university's applicable process. Program Directors should contact the Office of Youth Protection for guidance and coordination of such actions.

Making a report does not necessarily making an accusation; it only constitutes reporting of facts for trained professionals to use due process to evaluate, investigate and take appropriate action.

K. Accountability

1. **Site visits:** The staff from Office of Youth Protection may conduct random site Program visits to ensure compliance with this policy and to encourage use of best practices. Should the visit result in any findings of non-compliance with this policy, the Program will be required to address those findings within a specified time frame. Feedback on areas of recommended improvement may also be provided.
2. **Violations and sanctions:** Violators of this policy will be held accountable for their actions under the Program's code of conduct, university policy, and applicable law. Sanctions for violations may include, but are not limited to, suspension of university funding, non-renewal or termination of the Program, suspension, dismissal, or termination of university employment or Program Staff status, or removal or barring from University Facilities.

L. Coach Run Programs

All such programs must register online with the Office of Youth Protection and are subject to the terms and conditions of this policy.

M. Third Party programs

If a Third Party operates a program or activity that provides for the care, custody, or control of minors, the Third Party shall be responsible for the safety of such participants. The Third Party must take all reasonable precautions to supervise and otherwise protect the minors while they are on campus. The Third Party shall operate its program or activity in a reasonably safe manner, including but not limited to, conducting appropriate background checks, training its personnel, and supervising the minors. Third Parties may not operate Programs on University Facilities without an appropriate contractual agreement with the University that includes a provision requiring the Third Party to provide appropriate protection of minors as a material term of the contract. Such contracts must also include an indemnification provision in which the University is held harmless by the Third Party for acts or omissions arising from or related to the Third Party's Program and use of University Facilities and a requirement to maintain liability insurance coverage in amounts specified by the University. University departments that license facilities to Third Parties who operate programs involving minors shall consult with the Office of the General Counsel to ensure that the agreement with the Third Party contains the provisions required by this section.

RELATED UNIVERSITY, STATE, AND FEDERAL POLICIES

[CR 1.00 Civil Rights and Title IX](#)

[HR 1.90 Job Reference and Background Checks](#)

[Environmental Health and Safety – Volunteers and Minors](#)

[Programs Involving Minors – Resources and Forms](#)

HISTORY OF REVISIONS

DATE OF REVISION	REASON FOR REVISION
November 22, 2013	New policy approval
February 3, 2020	Updates to clarify policy and incorporate mandatory requirements
June 2, 2025	Policy reviewed and updated to reflect current practices.