

Protecting Minors

1. POLICY

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2. Policy Purpose

The University of Southern California (“USC” or “University”) is committed to providing safe environments and meaningful experiences for Minors participating in University-run or -affiliated activities, programs, and events, both on and off campus, and in a manner that aligns with our [Unifying Values](https://culturejourney.usc.edu/explore/unifying-values/) [https://culturejourney.usc.edu/explore/unifying-values/] of Integrity; Excellence; Diversity, Equity and Inclusion; Well-being; Open Communication; and Accountability. To uphold this commitment and comply with applicable laws, the University has established mandatory youth protection protocols and reporting responsibilities based on state and federal law to protect minors. These requirements are under the management of USC’s Office of Youth Protection and Programming, in consultation with USC’s Youth Protection Advisory and Working Groups.

3. Policy Statement

All members of the USC community should be familiar and comply with the provisions of this Policy, any related policies, and applicable procedures. The Policy and related procedures apply to any program, activity or event involving Minors conducted on University property, in a University facility, or under the authority of the University at another location or virtually. Additionally, third parties that have been approved by the Office of Youth Protection and Programming to operate a Covered Activity must adhere to this Policy and associated procedures.

4. Scope and Application

This Policy and applicable procedures apply to all members of the University Community. The reporting requirements in Section 6.I. (Reporting Requirements) do not supersede or exempt individuals from other University or legal reporting obligations, including the requirement to report prohibited conduct (as defined in the University’s [Policy on Prohibited Discrimination, Harassment, and Retaliation](https://policy.usc.edu/wp-content/uploads/2022/08/Policy-on-Prohibited-Discrimination-Harassment-and-Retaliation.pdf) [https://policy.usc.edu/wp-content/uploads/2022/08/Policy-on-Prohibited-Discrimination-Harassment-and-Retaliation.pdf]) to the USC Office for Equity, Equal Opportunity, and Title IX, as well as other mandated reporting requirements listed in [USC’s Mandated Reporters policy](https://policy.usc.edu/mandated-reporters/). [https://policy.usc.edu/mandated-reporters/]

5. Definitions

Term	Definition
Background Screening	<p>The process by which an individual’s information and background is verified and confirmed to help determine whether they are suited to work with Minors in a Covered Activity. Background Screening for Covered Activity Staff may include undergoing all or some of the following measures as outlined in this Policy:</p> <ul style="list-style-type: none"> – Live Scan fingerprint-based background check – Written application Live interview Reference checks (non-family members) – U.S. Center for SafeSport Disciplinary Database crosscheck – Cross-check of University disciplinary records

Child / Minor	Any person under the age of 18 years.
Child Abuse and Neglect Reporting Act (“CANRA”)	California Penal Code §§ 11164-11174.3 [https://leginfo.legislature.ca.gov/faces/codes_displayText.xhtml?lawCode=PEN&division=&title=1.&part=4.&chapter=2.&article=2.5], as currently in effect or subsequently amended.
Child Abuse and Neglect	<p>Child Abuse and Neglect includes:</p> <ul style="list-style-type: none"> – <i>Physical injury of a child inflicted by other than accidental means upon a child by another person;</i> – <i>Sexual abuse, meaning sexual assault or sexual exploitation of a child;</i> – <i>Neglect, meaning negligent treatment or the maltreatment of a child by a person responsible for the child’s welfare under circumstances indicating harm or threatened harm to the child’s health or welfare, including both acts and omissions on the part of the responsible person;</i> – <i>Willful harming or injuring of a child or the endangering of the person or health of a child, meaning a situation in which any person willfully causes or permits any child to suffer, or inflicts thereon, unjustifiable physical pain or mental suffering, or having the care or custody of any child, willfully causes or permits the person or health of the child to be placed in a situation in which his or her person or health is endangered; or</i> – <i>Unlawful corporal punishment or injury, meaning a situation where any person willfully inflicts upon any child any cruel or inhuman corporal punishment or injury resulting in a traumatic condition.</i> – <i>Child Abuse or Neglect does not include a mutual affray between minors, or an injury caused by reasonable and necessary force used by a peace officer acting within the course and scope of his or her employment as a peace officer.</i> – <i>The pregnancy of a minor does not in and of itself constitute a basis for reasonable suspicion of sexual abuse.</i> <p>For specific definitions of what conduct meets the definition of abuse or neglect under CANRA see California Penal Code §11165.1-11165.6. [https://leginfo.legislature.ca.gov/faces/codes_displayText.xhtml?lawCode=PEN&division=&title=1.&part=4.&chapter=2.&article=2.5]</p>
Covered Activity	Any activity, camp, program and/or event in which the care, custody, and/or supervision of one or more Minors (other than Minors who are Employees or Students) is reasonably expected to be the responsibility of one or more Covered Activity Staff, including University Employees, Students, Volunteers, and/or Third-Party staff acting on behalf of or pursuant to a contract with the University.
Covered Activity Administrator	An individual, unit, school, recognized student organization, program, or Third Party that operates a Covered Activity.
Covered Activity Staff	All individuals reasonably expected to work with or otherwise come into Direct Contact with Minors in a Covered Activity. This includes Employees, Students, Volunteers, and Third Parties administering a Covered Activity, including all individuals employed by, contracted by, or volunteering for a Third Party in connection with a Covered Activity.
Direct Contact	Contact that is reasonably expected to entail care, custody, guidance, control, and/or supervision of Minors in individual or group settings.
Employee	University employees, including University staff employees and non-University employees (such as employees of a staffing agency providing temporary personnel to the University) as defined in USC’s Employee Definitions policy [https://policy.usc.edu/employee-definition/].
Mandated Reporter	Any individual who, by virtue of their profession or licensure, is required under CANRA to report Child Abuse and Neglect to specified authorities. For a full and specific list of categories defined by CANRA see California Penal Code §11165.7 [https://leginfo.legislature.ca.gov/faces/codes_displaySection.xhtml?lawCode=PEN&sectionNum=11165.7].
Personal Data	Any information that identifies or could identify an individual (either alone or in combination with other information) that lives in any format (electronic, hard copy, etc.), including but not limited to an individual’s first and last name; telephone number; social media handle; photographs, videos or audio recordings; birthdate; education level, school enrollment; and parent/legal guardian contact information.
Sponsoring Unit	An academic or administrative unit of the University or one of its schools/colleges that: serves as a Covered Activity Administrator’s point of contact with the University; confirms alignment between a Covered Activity and the goals, values and initiatives of the unit and the University; partners with the Covered Activity Administrator and the Office of Youth Protection and Programming in ensuring compliance by the Covered Activity with this Policy; and shares responsibility for its activities.
Student	For the full definition of a student, refer to the USC Student Handbook [https://policy.usc.edu/scampus/].
Third Party	An organization or individual not affiliated with the University that operates or administers a Covered Activity.
University Activities	All of the University’s operations, including but not limited to locations, properties, events, or activities that are owned, sponsored, funded, affiliated with, or otherwise supported by the University. University Activities can include on-campus, off-campus, or online operations. Examples may include instruction; research; recruitment; admissions, athletic or recreational activities; conferences, meetings, social events, maintenance services, or other affiliated programs, activities, events or premises.
University Community	Employees, Students, Volunteers, Covered Activity Staff, Third Parties, and others that interact or engage with the University.
Volunteer	Any individual who is providing a service to the University or a Covered Activity, without monetary compensation, who is neither a USC Student nor a USC Employee.

6. Policy Details

All members of the University Community are expected to be role models for young people and to therefore maintain the highest standards for behavior when interacting with Minors. This includes acting in a respectful and responsible manner that is consistent with the University's Integrity and Accountability Code and the behavioral expectations set forth in [USC's Guidelines for Interacting with Minors](https://protectingminors.usc.edu/policies/guidelines-for-interacting-with-minors/) [https://protectingminors.usc.edu/policies/guidelines-for-interacting-with-minors/].

I. Reporting Requirements

The state of California has established various laws that seek to protect children from all forms of abuse, including the Child Abuse and Neglect Reporting Act ("CANRA") set forth in [California Penal Code §§ 11164-11174.3](https://leginfo.ca.gov/faces/codes_displayText.xhtml?lawCode=PEN&division=&title=1.&part=4.&chapter=2.&article=2.5) [https://leginfo.ca.gov/faces/codes_displayText.xhtml?lawCode=PEN&division=&title=1.&part=4.&chapter=2.&article=2.5] (see Section 10.I for more information). **Although CANRA imposes mandatory reporting obligations only upon certain categories of employees, this Protecting Minors policy seeks to promote the protection of Minors more broadly by requiring that all University Employees and Covered Activity Staff, regardless of whether they qualify as Mandated Reporters, immediately report suspected Child Abuse and Neglect, as well as all other serious incidents or violations relating to Minors, to the appropriate external agencies and University officials as described below.**

A. Who Must Report

All University Employees and Covered Activity Staff are required to report; all other members of the University Community are strongly encouraged to report as well.

In addition to CANRA, California Penal Code §152.3 requires that any individual who reasonably believes that they have observed a murder, rape, abuse, or sexual assault of a child under 14 notify a law enforcement official. Failure to do so is punishable by fines, imprisonment, or both. See Section 10.1I. for more information.

B. What Must Be Reported

1. Child Abuse and Neglect

The following general categories of Child Abuse and Neglect must be reported:

- Physical injury or death;
- Sexual abuse or exploitation;
- Neglect;
- The willful harming or injuring of a child (includes unjustifiable mental suffering) or the endangering of the person or health of a child; and
- Unlawful corporal punishment.

2. Other Serious Incidents and Violations Relating to Minors

In addition to the mandatory reporting of Child Abuse and Neglect, all other serious incidents and violations relating to Minors in connection with University Activities, including Covered Activities, must be reported. Such incidents or concerns may include, but are not limited to the following:

- Serious injuries, accidents, etc.
- Medical or mental health emergencies (subject to any medical confidentiality requirements)
- Near misses (e.g., a situation that could have resulted in a serious accident or injury)
- Inappropriate behavior, including grooming behavior, or boundary violations
- Violations of this Policy or USC Guidelines for Interacting with Minors

C. When Reporting is Required

Immediate reporting is required when a Covered Activity Staff member or Employee serving in their professional capacity or through the course of their employment observes, learns about from any source (e.g., social media, rumor, etc.), has knowledge of, or reasonably suspects that an incident as described in **Section I.B. 1 and 2 has occurred**. Additionally, incidents of child abuse, neglect, and other serious incidents that are observed, known, learned about, or reasonably suspected to have occurred in connection with University Activities or to have been perpetrated by a member of the University Community also require immediate reporting regardless of the context in which information about the matter arises.

Reasonable suspicion means that it is reasonable for a person to suspect based on the information, training, and experience the person has; it does not require certainty that an incident has occurred.

Known or suspected incidents that occurred in the past where the Minor involved at the time is now an adult (18 years of age or older) must be immediately reported to the Office of Youth Protection and Programming for review to determine whether further reporting or action is necessary.

D. Reporting Process

If there is an imminent threat to health or safety, contact 911 before following the steps below.

1. Reporting Child Abuse and Neglect

1. Immediately report the matter to the Department of Children and Family Services (DCFS) by calling the Child Protective Services Hotline (available 24 hours, 7 days per week):

- Toll-free within California: (800) 540-4000
- From outside California: (213) 639-4500
- TDD (Telecommunication Device for the Deaf): (800) 272-6699

2. Immediately following a report to DCFS, and within no more than 24 hours, submit notice to the Office of Youth Protection and Programming by completing [USC Child Abuse and Neglect Reporting Form](https://protectingminors.usc.edu/reporting/). [<https://protectingminors.usc.edu/reporting/>]

3. Within 36 hours of the initial telephone report, file a written report with DCFS by completing and submitting **Form SS8572** [https://oag.ca.gov/sites/all/files/agweb/pdfs/childabuse/bcia_8583.pdf?] (Suspected Child Abuse Report or “SCAR”) as indicated during the call with DCFS.

2. Reporting Other Serious Concerns and Violations Relating to Minors

As soon as possible, and within no more than 24 hours after becoming aware of the original concern, report all other serious concerns and violations relating to Minors to the Office of Youth Protection and Programming by completing [USC Notice of Concern Form](https://protectingminors.usc.edu/reporting/) [<https://protectingminors.usc.edu/reporting/>].

II. Training

In an effort to assist Covered Activity Staff and Employees carry out their reporting responsibilities and understand their role in protecting Minors, all Covered Activity Staff and Employees are required to complete youth protection training aimed at the prevention of Child Abuse and Neglect, the recognition of the signs and symptoms of Child Abuse and Neglect, and applicable reporting requirements and procedures.

Specific training requirements are as follows:

- All Employees will receive training related to their obligations under this Policy.
- All Covered Activity Staff and all Employees who qualify as Mandated Reporters must complete youth protection training before having direct contact with Minors and on an annual basis thereafter.
- Covered Activity Staff may not begin work in any Covered Activity or have Direct Contact with Minors until documentation of completion has been received, reviewed and approved by the Office of Youth Protection and Programming.

Youth protection training programs are available through the Office of Youth Protection and Programming. Training approved and assigned by the Office of Youth Protection and Programming must be completed, regardless of whether the Covered Activity Staff or

Employee has received youth protection training elsewhere, unless the training received previously is approved in writing by the Office of Youth Protection and Programming.

III. Activities Involving Minors

All organized activities involving Minors that do not meet the definition of a Covered Activity should be reviewed by the Office of Youth Protection and Programming in advance to determine what requirements and additional safeguards may be necessary to help provide for the safety and well-being of the Minors involved.

Minors on campus who are not participating in Covered Activities are to be supervised at all times by a parent or legal guardian, or by another authorized adult (e.g., teacher); for safety reasons, DPS shall be notified if a child is left alone or unattended on campus.

IV. Requirements for Covered Activities

In order to provide a safe and secure environment for Minors, all Covered Activity Administrators and Covered Activity Staff must comply with a specific set of minimum requirements, intended to promote the safety of Minor participants.

A. Sponsoring Unit

Each Covered Activity must be sponsored by a Sponsoring Unit that: serves as a Covered Activity Administrator's point of contact with the University; confirms alignment between the Covered Activity and the goals, values and initiatives of the unit and the University; partners with the Covered Activity Administrator and the Office of Youth Protection and Programming in ensuring compliance by the Covered Activity with this Policy; and shares responsibility for its activities. Covered Activity Administrators must have preliminary approval from the head of the Sponsoring Unit, or appropriate designee, before registering a Covered Activity with the Office of Youth Protection and Programming.

B. Registration and Approval

1. After receiving preliminary approval from a Sponsoring Unit, the Covered Activity Administrator must register the Covered Activity with the Office of Youth Protection and Programming at least 60 days prior to the anticipated start date. Registration of ongoing and preestablished Covered Activities is required initially and on an annual basis thereafter. New or additional Covered Activities will require a new registration. Covered Activity Administrators must also update their registration with the Office of Youth Protection and Programming whenever there is a change to the information submitted in the Covered Program's prior registration request(s).

2. Covered Activity Administrators and their Sponsoring Units are also responsible for ensuring the Covered Activity's compliance with all other applicable [University policies \[https://policy.usc.edu/\]](https://policy.usc.edu/), and requirements including, but not limited to, the [Minors in Laboratories and Shops policy \[https://policy.usc.edu/minors-in-laboratories-and-shops/\]](https://policy.usc.edu/minors-in-laboratories-and-shops/), the [Policy on Prohibited Discrimination, Harassment, and Retaliation \[https://policy.usc.edu/wp-content/uploads/2022/08/Policy-on-Prohibited-Discrimination-Harassment-and-Retaliation.pdf\]](https://policy.usc.edu/wp-content/uploads/2022/08/Policy-on-Prohibited-Discrimination-Harassment-and-Retaliation.pdf), and any applicable Institutional Review Board (IRB) protocol(s), if applicable.

3. As part of registration, Covered Activity Administrators must submit the following information and documentation:

- A registration form that includes the confirmation of an authorized official from the Covered Activity's Sponsoring Unit indicating the Sponsoring Unit's agreement to sponsor the Covered Activity, as well as the name and contact information, including email and mobile number, for the head of the Sponsoring Unit or their authorized designee;
- A description of all Covered Activities, including the date(s), location(s), expected age(s) and number of participants, the number of Covered Activity Staff that will be involved, supervision ratios, and contact information for the person(s) responsible for overseeing the Covered Activity;
- Names and contact information for all Covered Activity Staff. For USC-run or -affiliated Covered Activities this information will be provided to Human Resources for the purposes of conducting and/or verifying applicable background screenings as described below in Section IV.C.;
- Names of all registered Minor participants and parent/legal guardian contact information; a finalized list with any updates must also be submitted no later than 3 days after the start of a Covered Activity and again within 3 days of the completion of the Covered Activity; and

- Documentation that all Covered Activity Staff have completed the training and screening requirements as outlined in Section 6.II and 6.III.C. no later than 7 days prior to a Covered Activity's start date.

4. Due to their significant responsibility for the oversight of campus activities, Covered Activity Administrators are considered Campus Security Authorities (CSA) under the Jeanne Clery Disclosure of Campus Security Policy and Campus Crime Statistics Act (20 U.S.C. §1092 (f)) ("Clery Act"), and will be provided education about their responsibilities prior to the start date of their registered Covered Activity.

For more information about these responsibilities, including the full definition of a CSA, see [USC's Clery_policy \[https://policy.usc.edu/clery-policy/\]](https://policy.usc.edu/clery-policy/).

Covered Activity Administrators that fail to provide required registration information or that do not meet the minimum requirements outlined in this Policy will not be approved to operate a Covered Activity.

C. Background Screening Requirements

No Covered Activity Staff is permitted to have Direct Contact with a Minor in a Covered Activity until all of the requirements of this section are completed and the Office of Youth Protection and Programming has reviewed the results and deemed the individual eligible to participate. Documentation relating to background screening must be submitted to the Office of Youth Protection and Programming no less than 7 days before the start date of a Covered Activity for review and approval; Covered Activity Administrators that fail to do so will not be approved to operate the Covered Activity (see Section 7. Procedures).

1. Criminal Background Checks

In addition to the requirements set forth in [USC's Background Screening_policy \[https://policy.usc.edu/screening/\]](https://policy.usc.edu/screening/) for Employees, Covered Activity Staff (including those who are also Employees), must successfully complete and clear a Live Scan fingerprint-based criminal background check as outlined by the Office of Youth Protection prior to participating in a Covered Activity (see Section 7. Procedures).

Criminal background check results shall be securely maintained by University Human Resources and the Office of Youth Protection and Programming, in accordance with other applicable University policies. Criminal background check results for Third Parties and their Covered Activity Staff shall be securely maintained by the Office of Youth Protection and Programming.

2. Additional Screening

A. Covered Activities must obtain a written application from all Covered Activity Staff not employed by the University. Covered Activities must also conduct a live interview with these individuals, and complete at least two reference checks (non-family members) to assess their suitability for working with Minors. As part of registration, Covered Activity Administrators must attest all selected non-USC Covered Activity Staff have undergone this additional screening and securely maintain these screening documents as part of the Covered Activity's overall records. Evidence of compliance may be requested at any time by the Office of Youth Protection and Programming.

B. Covered Activities must screen all Covered Activity Staff against the U.S. Center for SafeSport's Disciplinary Database, and attest this has been completed prior to the Covered Activity's start date.

C. In addition to criminal background checks, the Office of Youth Protection and Programming may conduct additional screening measures of Covered Activity Staff, including a cross-check of University disciplinary records.

D. The University may request follow-up information as part of its screening measures

3. Third-Party Screening Requirements

Third Parties must conduct background screening of all of their Covered Activity Staff in a manner that is consistent with the requirements of this policy, and certify with the Office of Youth Protection and Programming that all requirements in Sections C.1. and C.2. have been met.

D. Education for Minors and Parents/Legal Guardians

1. Prior to conducting Covered Activities, Covered Activity Administrators will inform each Minor participant and their parent/legal guardian of the following information:

- Applicable University and Covered Activity rules, including this Policy and USC’s Guidelines for Interacting with Minors;
- How Minors and parents/legal guardians can report violations of this Policy and other concerns, including inappropriate behavior that may not appear to be abusive or neglectful (e.g., boundary violations, bullying, grooming, etc.);
- USC’s protocols for reporting suspected Child Abuse or Neglect;
- Behavioral expectations for Covered Activity Staff and Minors participating in the Covered Activity, and a description of the Covered Activity Administrator’s response to rules or conduct violations;
- Notice of USC’s [Disability Accommodations policy \[https://policy.usc.edu/disability-accommodations/\]](https://policy.usc.edu/disability-accommodations/), including a timeline for requests and who to contact to explore reasonable accommodations for Minor participants with disabilities;
- Notice of USC’s [Policy on Prohibited Discrimination, Harassment, and Retaliation \[https://policy.usc.edu/wp-content/uploads/2022/08/Policy-on-Prohibited-Discrimination-Harassment-and-Retaliation.pdf\]](https://policy.usc.edu/wp-content/uploads/2022/08/Policy-on-Prohibited-Discrimination-Harassment-and-Retaliation.pdf);
- Information about how to [sign up for TrojansAlert \[https://dps.usc.edu/services/trojans-alerts/\]](https://dps.usc.edu/services/trojans-alerts/); and
- Covered Activity safety and security procedures, including the process for notifying parents/legal guardians of an emergency and how parents/legal guardians can contact their children during the Covered Activity.

2. Covered Activity Administrators will also offer the parents/legal guardians of Minor participants training or information about the prevention and reporting of Child Abuse and Neglect, as well as appropriate boundaries for physical, electronic, and verbal interactions between adults and youth, and between peers.

E. Supervision Ratios

A Covered Activity’s supervision needs may vary depending on the nature of the activity. Covered Activities should, to the greatest extent possible, make arrangements for the presence of at least two Covered Activity Staff when supervising or in direct contact with Minors. At minimum, the following Covered Activity Staff-to-Minor supervision ratios, as recommended by the **American Camp Association [https://www.acacamps.org/]**, must be met for all in-person activities:

Program participant age group	Number residential (overnight) participants	Number of non-residential (day only) participants	Number of Covered Activity Staff
5 years*	5	6	1
6-8 years	6	8	1
9-14 years	8	10	1
15-18 years	10	12	1

For example, a residential program with 16 “9-14-year-old” Minor participants requires 2 Covered Activity Staff members be present at all times.

*Covered Activities involving Minors younger than 5 years of age are to contact the Office of Youth Protection and Programming for guidance.

F. One-on-one interactions

All one-on-one interactions between a Covered Activity Staff person and a Minor must be observable and interruptible by another Covered Activity Staff member, except under emergency circumstances (i.e., life-threatening situation or imminent danger).

G. Electronic Communications

Covered Activity Staff may not have personal, non-programmatic electronic communication with Minor participants during the Covered Activity. Except in an emergency, all electronic communication must be open and transparent, meaning there must be at least three individuals included on any given communication, including another Covered Activity Staff member, multiple Covered Activity participants, and/or the Minor’s parent/legal guardian.

H. Overnights and Lodging

For Covered Activities that involve an overnight or lodging component, the following requirements apply:

- Separate accommodations for adults and Minors are required; Covered Activity Staff may not share a room with a Minor with the exception of a parent/legal guardian who may room with their own child(ren), but no others.
- At least two Covered Activity Staff must always be present when conducting room checks.
- If Minors will be residing together, Covered Activity Administrators must make efforts to ensure that youth of the same or similar ages are grouped together.

Restrooms, Changing Areas and Locker Rooms

For Covered Activities that will require use of bathroom, changing area or locker room facilities, the following requirements apply:

- Covered Activity Staff must never be alone with a Minor in these areas.
- Should an activity require changing or showering, Minors must always have access to a private or semi-private changing area or shower stall.
- Covered Activity Staff must never change clothes in front of a Minor, nor shower in front of a Minor, unless it is part of a pre- or post-activity rinse and appropriate swimwear is worn.
- Covered Activity Staff shall make every effort to minimize changing area or locker room use when other non-Covered Activity Staff adults are present, and avoid allowing different aged youth to change and/or shower at the same time.
- No cameras or recording devices of any kind may be used in these areas when Minors are present.

J. Transportation

1. Check-in/Check-out Protocols

- Covered Activity Administrators shall establish a procedure for checking Minors in and out of Covered Activities to help facilitate a safe transfer of supervision, and to confirm that no Minor participant will be released to any person other than his or her parent/legal guardian without advance, written authorization.
- In situations where Minors are authorized to leave with someone other than the parent/ legal guardian, a verification process must be in place to ensure the Minor is being released to the authorized individual.

2. Transportation of Minors

- Covered Activity Staff are not permitted to transport Minors alone in any vehicle, except in an emergency (i.e., life-threatening situation or imminent danger).
- Covered Activity Staff who may be responsible for driving a vehicle must first meet the necessary criteria outlined in the Vehicle/Driver Requirements Policy and be pre-approved by USC Risk Management.

K. Emergency Preparedness

Covered Activity Administrators must collect medical and emergency contact information for Covered Activity youth participants, and ensure information is securely stored in an information management system approved by the Office of Youth Protection and Programming. Other documentation may also be required depending on the type of Covered Activity.

Additionally, Covered Activity Administrators must establish an emergency plan to address potential risks that could occur during the Covered Activity. The plan must include a procedure for contacting the parent/legal guardian in the event of an emergency, and for informing parents/legal guardians of the procedure for contacting Covered Activity Staff and/or their child during activities.

L. Data Privacy

Depending on the nature of the Covered Activity, Personal Data of Minors may be collected, stored and used for the purpose of providing, operating, improving and promoting a Covered Activity. However, it must be done in a transparent and responsible manner,

ensuring it remains secure and confidential, and shared only with those who need access to carry out activities and to provide for the safety and well-being of Minor participants.

Covered Activity Administrators must adhere to the following requirements regarding the Personal Data of Minors:

1. Collection and Disclosure

- Covered Activity Administrators must provide parents/ guardians a privacy statement, with language approved by the Office of Youth Protection and Programming, describing their practices for collecting personal data, including why it is being collected; how it will be used, shared, stored and retained; and who to contact with questions.
- Covered Activity Administrators must obtain parent/legal guardian consent (and should collect Minor Participant consent as well) before collecting Personal Data directly from Minors, and before taking and using any photographs, videos, audio recordings, etc. of Minors. Activity Administrators must obtain written consent using an appropriate form approved by the Office of Youth Protection and Programming.
- If content that identifies or can identify a Minor (e.g., essay, artwork, etc.) will be created during the Covered Activity, parent/legal guardian written consent must also be obtained if it will be shared publicly.

2. Storage and Use

- All Personal Data of Minors must be securely stored and in compliance with USC [Information Security policies](https://policy.usc.edu/data-protection/) [<https://policy.usc.edu/data-protection/>].
- Personal Data may only be shared with those who have a specific need to have it in order to carry out Covered Activities, and to provide for the safety and well-being of the Minor.
- Authorized images, videos, or created content that may identify a Minor may not be shared publicly until the Covered Activity has concluded, and may only be used on official University or Covered Activity platforms after obtaining the required written parent/legal guardian consent; Covered Activity Staff are not permitted to post images, videos or content of Minors on personal platforms.

3. Retention and Disposal

- Retain Personal Data collected in accordance with University retention policies and/or other legal requirements.
- When no longer needed or required to be retained, delete the information using reasonable measures to protect against its unauthorized access or use.
- Dispose of Personal Data in paper format in a way to prevent inappropriate access to the data (e.g., shredding).

M. Exemptions

Should a Covered Activity Administrator deem that a section of this Policy would inhibit the administration of a Covered Activity and its intended goals or outcomes, an exemption can be requested by submitting an exemption request to the Office of Youth Protection and Programming.

This request must include how the Covered Activity's administration, goals or outcomes are not supported by the policy from which it is requesting exemption, as well as a description of alternative safeguards that would be implemented to adequately address the protection of Minors in the policy's absence.

Exemption requests must be submitted 90 days before a Covered Activity begins, and on an annual basis for ongoing or pre-established Covered Activities. Approval or denial will be provided within 30 days of receiving the exemption request.

N. Covered Activity Evaluations

Administrative and on site evaluations of compliance of a Covered Activity will be conducted by the Office of Youth Protection and Programming. Covered Activities must participate in evaluations. Covered Activities not meeting the requirements of this Policy may be canceled for noncompliance.

IV. Compliance

In addition to the criminal penalties and sanctions that may apply for failure to report child abuse or neglect, failure to comply with the requirements of this Policy may result in University disciplinary action or other sanctions applicable to the individual up to and including suspension, dismissal, termination, and, where appropriate, exclusion from campus. The Office of Professionalism and Ethics, in conjunction with the Office of Youth Protection and Programming, will evaluate whether the Policy was violated and consult with other applicable offices regarding the appropriate sanction. Should disciplinary action or sanctions be necessary, they will be imposed in accordance with the [Faculty Handbook \[https://policy.usc.edu/faculty-handbook/faculty-handbook/\]](https://policy.usc.edu/faculty-handbook/faculty-handbook/), and [Staff Disciplinary Practices \[https://policy.usc.edu/staff-disciplinary-practices/\]](https://policy.usc.edu/staff-disciplinary-practices/).

The University may also take necessary interim actions before determining whether a violation has occurred, including temporarily restricting any individual against whom there is an allegation of misconduct from working with Minors in a Covered Activity until the matter has been satisfactorily resolved.

The University may terminate relationships or take other appropriate actions against non-university entities that violate this Policy, in accordance with the applicable agreements.

The University reserves the right to prohibit any individual from having direct contact with a Minor in a Covered Activity, should it deem necessary and as allowed by law.

7. Procedures

All procedures can be found on the [Office of Youth Protection’s website \[https://protectingminors.usc.edu/activity-registration/registration-roadmap/\]](https://protectingminors.usc.edu/activity-registration/registration-roadmap/).

8. Forms

- [Youth Protection training certification for non-University organizations and entities \[https://protectingminors.usc.edu/wp-content/uploads/sites/5/2022/02/Certification-for-non-university-youth-protection-training-2022.pdf\]](https://protectingminors.usc.edu/wp-content/uploads/sites/5/2022/02/Certification-for-non-university-youth-protection-training-2022.pdf)
- [Certification for non-university background screening \[https://protectingminors.usc.edu/wp-content/uploads/sites/5/2022/10/Certification-for-non-university-background-screening-2022-1.pdf\]](https://protectingminors.usc.edu/wp-content/uploads/sites/5/2022/10/Certification-for-non-university-background-screening-2022-1.pdf)
- [Suspected Child Abuse Report \(SCAR\) Form SS8572 \[https://oag.ca.gov/sites/all/files/agweb/pdfs/childabuse/bcia_8583.pdf?\]](https://oag.ca.gov/sites/all/files/agweb/pdfs/childabuse/bcia_8583.pdf?)
- [USC Child Abuse and Neglect Reporting Form \[https://urldefense.com/v3/https://live.origamirisk.com/Origami/IncidentEntry/Direct?token=I4qWhtXonFvTWD9xTIPiAi2yCo7RFI4XELUuxG0logdPgCaf1zItBcXEmJRgL31LW2YBaMGRYwjdilNKBqQjYeaYfsYVKeukJ2IXmlqkr*2F\]](https://urldefense.com/v3/https://live.origamirisk.com/Origami/IncidentEntry/Direct?token=I4qWhtXonFvTWD9xTIPiAi2yCo7RFI4XELUuxG0logdPgCaf1zItBcXEmJRgL31LW2YBaMGRYwjdilNKBqQjYeaYfsYVKeukJ2IXmlqkr*2F)
- [USC Notice of Concern Form \[https://urldefense.com/v3/https://live.origamirisk.com/Origami/IncidentEntry/Direct?token=I4qWhtXonFvTWD9xTIPiAi2yCo7RFI4XELUuxG0logdPgCaf1zItBcXEmJRgL31LW2YBaMGRYwjdilNKBqQjYU*2B81iYy9XAwyxw0fLfpzi\]](https://urldefense.com/v3/https://live.origamirisk.com/Origami/IncidentEntry/Direct?token=I4qWhtXonFvTWD9xTIPiAi2yCo7RFI4XELUuxG0logdPgCaf1zItBcXEmJRgL31LW2YBaMGRYwjdilNKBqQjYU*2B81iYy9XAwyxw0fLfpzi)
- [Covered Activity Registration Form \[https://apps.ideal-logic.com/uscyp\]](https://apps.ideal-logic.com/uscyp)
- [Policy Exemption Request Form \[https://apps.ideal-logic.com/uscyp\]](https://apps.ideal-logic.com/uscyp)

9. Responsibilities

POSITION or OFFICE	RESPONSIBILITIES
Covered Activity Administrators	Reporting Child Abuse and Neglect and other serious concerns and violations relating to Minors as outlined in this Policy; Ensuring Covered Activity operations are in line with all requirements outlined in this Policy; Obtaining appropriate parental/legal guardian consent based on programming or activities; and Maintaining Covered Activity records.
Sponsoring Unit	Reviewing and granting preliminary approval for a Covered Activity to operate based on alignment with the goals, values and initiatives of the unit and the University, and helping to oversee compliance with University policies.
USC Employees and Covered Activity Staff	Exhibiting behavior that aligns with the expectations set forth in USC’s Guidelines for Interacting with Minors; Reporting Child Abuse and Neglect and other serious concerns and violations relating to Minors as outlined in this Policy; Undergoing screening and completing youth protection training as required; and Operating Covered Activities in line with all applicable aspects of this Policy.
USC Office of Youth Protection and	Determining if a camp, program, activity or event involving Minor(s) is to be considered a “Covered Activity;” Providing centralized registration and youth protection training; Approving a Covered Activity to operate based on compliance with registration, training, background checks, and

10. Related Information

I. The Child Abuse and Neglect Reporting Act (“CANRA”) pursuant to [California Penal Code §§ 11164-11174.3](#)

[https://leginfo.ca.gov/faces/codes_displayText.xhtml?lawCode=PEN&division=&title=1.&part=4.&chapter=2.&article=2.5],

seeks to protect children and youth from abuse and neglect in any aspect of their lives (including but not limited to their home, school, religious worship, and extracurricular activities such as sports, scouting, etc.). To accomplish this, CANRA designates individuals in certain professions as “mandated reporters.” Mandated reporters have an individual legal obligation to immediately report known or suspected abuse or neglect to the proper child protection or law enforcement agency whenever they, in their professional capacity or within the scope of their employment, know or have reasonable suspicion of Child Abuse or Neglect. A full list of mandated reporters is contained in [California Penal Code section 11165.7](#).

[https://leginfo.ca.gov/faces/codes_displayText.xhtml?lawCode=PEN&division=&title=1.&part=4.&chapter=2.&article=2.5]

The list includes, but is not limited to:

- Coaches or assistant coaches;
- Teachers, instructional aides, or teachers’ assistants;
- Health care providers;
- Social workers and mental health practitioners;
- Administrators of a day camp;
- Administrators or employees of youth recreation programs; and
- Administrators, board members, or employees of public or private organizations whose duties require direct contact and supervision of children.

II. [California Penal Code § 152.3](#) [https://leginfo.ca.gov/faces/codes_displaySection.xhtml?lawCode=PEN§ionNum=152.3]

requires that any person who reasonably believes that he or she has observed a murder, rape or certain lewd or lascivious acts where the victim is a child under 14 years of age shall notify a peace officer (such as a campus or community police officer or sheriff) of the potential crime. This reporting mandate applies whether or not the witness is a mandated reporter, and regardless of their affiliation with the University. Limited exceptions include only (1) a person related to either the victim or the offender; (2) a person who fails to report based on a reasonable mistake of fact; and (3) a person who fails to report out of fear for their or their family’s safety.

III. Related policies

- [Disability Accommodations](https://policy.usc.edu/disability-accommodations/) [<https://policy.usc.edu/disability-accommodations/>]
- [Mandated Reporters](https://policy.usc.edu/mandated-reporters/) [<https://policy.usc.edu/mandated-reporters/>]
- [Minors in Laboratories and Shops](https://policy.usc.edu/minors-in-laboratories-and-shops/) [<https://policy.usc.edu/minors-in-laboratories-and-shops/>]
- [Policy on Prohibited Discrimination, Harassment, and Retaliation](https://policy.usc.edu/wp-content/uploads/2022/08/Policy-on-Prohibited-Discrimination-Harassment-and-Retaliation.pdf) [<https://policy.usc.edu/wp-content/uploads/2022/08/Policy-on-Prohibited-Discrimination-Harassment-and-Retaliation.pdf>]
- [USC Integrity and Accountability Code](https://policy.usc.edu/code-of-ethics/) [<https://policy.usc.edu/code-of-ethics/>]
- [Clery Policy](https://policy.usc.edu/clery-policy/) [<https://policy.usc.edu/clery-policy/>]

III. Related resources

[Frequently Asked Questions](https://protectingminors.usc.edu/policies/frequently-asked-questions/) [<https://protectingminors.usc.edu/policies/frequently-asked-questions/>]

11. Contacts

Please direct any questions regarding this policy to:

OFFICE	PHONE	EMAIL
Office of Youth Protection and Programming	(213) 740-2656	minors@usc.edu [mailto:minors@usc.edu]