

UNIVERSITY POLICY



Protection of Minors

Responsible Office: Butler Arts & Events Center

Effective Date: March 10, 2026

This policy establishes guidelines to promote the wellbeing of Minors, educate the University community about their obligations, and describe the requirements for all individuals who interact with Minors as part of a University Program or Non-University Program.

I. Scope

This policy applies to the entire University community, including faculty, staff, students, volunteers, visitors, affiliates and contractors. All University Programs, regardless of location (on or off campus), and all Non-University Programs occurring on University property fall within the scope of this policy.

II. Definitions

Campus: All buildings, facilities, and properties that are owned, operated, managed, rented, or controlled by the University for University programs.

Minor: Anyone under the age of 18 years who is not matriculated or enrolled in a degree-seeking program.

Direct Contact: Interaction with Minors that involves care, supervision, guidance, control, or responsibility for a Minor, or that occurs on a routine, ongoing, or programmatic basis. Direct Contact may occur in person, virtually, or through electronic communication and includes situations where an individual is reasonably expected to be alone with a Minor or to exercise authority over a Minor, whether temporarily or regularly.

Program Director: The individual(s) responsible for implementing and enforcing the policies governing a Program.

Authorized Adult: Any person expected to interact with, supervise, chaperone, or otherwise oversee Minors during a University Program or Non-University Program. This includes faculty, staff, students, volunteers, employees, affiliates, and contractors.

University Program: A program, event, or activity open to Minors that is operated and controlled by a University department, office, division, or college, whether held on University property or at a third-party/off-campus location and during which the University assumes responsibility for the care and custody of the Minors. Routine academic interactions, including individual meetings, advising conversations, or single-instance outreach activities, do not constitute a University Program unless the University assumes responsibility for the care, supervision, or custody of Minors.

Non-University Program: An outside organization that uses University facilities to conduct a program, event, or activity with Minors pursuant to an approved agreement with Butler University.

Abuse or Neglect: Any act or omission that gives a person reason to believe a Minor's physical or mental health is seriously impaired or endangered. This includes:

1. Physical or Mental Injury: Non-accidental serious injury or the creation of a substantial risk of such injury.
2. Sexual Abuse: Any sexual conduct with a Minor, including touching, exploitation, or the simulation/visual depiction of sexual acts, regardless of consent.
3. Neglect: The failure of a parent, guardian, or custodian to provide necessary food, clothing, shelter, medical care, education, or supervision.

For the purposes of this policy and mandatory reporting duties, "reason to believe" does not require proof or certainty. It exists when facts or circumstances would cause a reasonable person to suspect that a Minor has suffered or is at risk of suffering harm.

III. Mandatory Reporting of Minor Abuse or Neglect

Everyone (faculty, staff, students, visitors, contractors, affiliates) must comply with Indiana's mandatory reporting laws ([Indiana Code § 31-33-5 et seq](#)), which require any individual who has any reason to believe that a Minor is a victim of Minor abuse or neglect to IMMEDIATELY make a report to one of the following:

- Indiana Department of Child Services (1-800-800-5556); or
- Butler University Police Department (317-940-9999); or
- 9-1-1 to make a report to local law enforcement in the case of emergencies.

Reporting to the above-mentioned authorities must take precedence over internal reporting, especially in emergencies. Failure to immediately report to one of the entities listed above subjects the individual to criminal prosecution and discipline by the University, including potential termination of employment or material breach of contract.

After an employee (faculty or staff) makes the report, the employee must notify the employee's supervisor of the report as soon as safely possible after the primary external report is made. The supervisor must promptly notify their Human Resources Business Partner. Students, visitors, contractors, and affiliates who make a report to the Indiana Department of Child Services or 9-1-1 must notify the Butler University Police Department (BUPD) as soon as safely possible after the external report is made.

IV. Training

Any Authorized Adult who will have Direct Contact with a Minor participating in a University Program must complete the following training prior to the start date of the program:

- *Online Training:* Complete the Indiana Department of Child Services' [Reporting Abuse and Neglect training module](#). This training must be completed every two (2) years.
- *Behavior Expectations:* Review the Behavioral Expectations for Interacting with Minors document found in Appendix A to this policy. This must be reviewed at least once every twelve (12) months.

- *Mandatory Reporting:* Review Mandatory Reporting of Minor Abuse and Neglect standards, as stated in section III, every twelve (12) months.

Authorized Adults employed by or volunteering for Non-University Programs must demonstrate proof of equivalent training.

The Program Director and the Vice President of the division or department under which the University Program is being operated must complete the Verification of Compliance found in Appendix B. Failure to abide by training obligations will result in program cancellation or other sanctions.

V. Behavioral/Conduct Requirements

Everyone must adhere to the Behavioral Guidelines for Interacting with Minors (attached as Appendix A) as well as all other applicable University policies with respect to all Minors on campus. Violations of this section may result in discipline, including termination if an employee, conduct violation, if a student and for the violator to be trespassed from campus property.

Rule of Twos

One-on-one contact with a Minor should be minimized and reasonable steps should be taken so that interactions take place in the presence of two adults, with at least one of them being an Authorized Adult or parent/guardian. If a one-on-one interaction is unavoidable (e.g., music instruction, mentor meeting), it must occur in an open, well-lit space with a window or open door viewable by others. The door must remain open for the duration of the session.

Communication

All electronic communication must be professionally necessary and must copy the Minor's parent/guardian or a second Authorized Adult. Authorized Adults may not have private, one-on-one direct electronic contact (text, social media DM, etc.) with a Minor that is purely social or informal, especially on private social media platforms.

Transportation

The transportation of Minors as part of any University Program—regardless of whether the program is held on-campus or at an off-campus location—must adhere to the following safety standards:

- A. Transportation should be conducted using University-owned vehicles, leased vehicles, or licensed third-party commercial carriers (e.g., chartered buses). Any licensed third party-party commercial carrier must have a contract with the University, approved by the University's Office of General Counsel, prior to transporting any Minors.
- B. Rule of Twos in Vehicles: Except in the case of emergency, the "Rule of Twos" applies to all program-related transportation; at least two Authorized Adults must be present in the vehicle at all times when Minors are being transported.
- C. Personal Vehicles: Except in the case of emergency, transporting a Minor in a personal vehicle is prohibited.

VI. Criminal Background Checks and Screening

- A. All Authorized Adults must comply with the University's comprehensive Background Check Policy. Third parties must submit a certification of compliance (including background checks and training completion) at least 14 days prior to the program start date.
- B. Exemptions for Certain Activities. For purposes of this section, the activities listed below are deemed not to involve Direct Contact for purposes of background check requirements, provided the stated conditions are met:
 - i. Programs in which Minors attend for the entire duration under the continuous supervision of a parent or legal guardian, or under the continuous supervision of another adult expressly authorized by the Minor's parent or legal guardian, and for which the University does not assume responsibility for the care, supervision, or custody of the Minor.
 - ii. Short duration, Non-University Programs where third parties provide their own chaperones, such as school field trips. In these cases, the entity responsible for the Non-University Program must be contractually required to ensure all participants have signed a liability waiver and indemnify and hold harmless Butler University for acts related to their Program.
 - iii. Public events where Minors attend at the discretion of their parents or guardians.
 - iv. Campus tours or visits for prospective students, provided such visits do not include overnight stays in University housing. Programs involving overnight stays by Minors must comply with the specific protocols outlined in Overnight Stays in University Housing section of this policy.
 - v. Regularly scheduled classes or activities designed primarily for enrolled students.
 - vi. Single instance visits by Minors to meet with faculty or academic appointees to discuss academic, intellectual or career interests, so long as the visit complies with the Behavioral/Conduct Requirements.

Activities falling within the above exemptions do not, by themselves, trigger training or background check requirements under the University's Background Check Policy.

Notwithstanding the foregoing exemptions, the University reserves the right to require background checks or additional safeguards for any activity involving Minors where circumstances warrant enhanced protection.

VII. Overnight Stays in University Housing

- A. Host Eligibility & Screening. Enrolled students serving as overnight hosts ("Student Hosts") are not considered Authorized Adults and are not subject to Tier 2 Criminal Background Checks, unless they are acting as paid employees with supervisory duties. However, the Sponsoring Department (e.g., Admissions, Athletics) must:
 - i. Conduct Verification: Verify with the Office of Student Conduct/Dean of

Students that the Student Host is in good standing and has no history of disciplinary violations related to violence, sexual misconduct, harassment, hazing, or substance abuse.

- ii. Training: Ensure the Student Host acknowledges receipt of written guidelines regarding boundaries with Minors, prohibition of alcohol/drug use during the visit, and emergency reporting procedures.

B. Parental Consent & Waiver. No Minor may stay overnight in University housing without a *Parental Consent and Assumption of Risk* form signed by a parent/legal guardian on file prior to arrival. The waiver must explicitly acknowledge that the Minor will be staying in a residence with adult students and that 24/7 direct supervision is not provided.

C. Behavioral Restrictions

- i. Prohibited Environments: Student Hosts are strictly prohibited from taking Minors to private parties, bars, or any location where alcohol or controlled substances are present.
- ii. Housing Assignments: To the extent feasible, Minors should not be housed in a 1:1 solitary setting with a single Student Host. Placements with a Host who has roommates, or placing Minors in pairs, is preferred.
- iii. Curfew: The Sponsoring Department must establish a curfew by which the Minor must be returned to the assigned residence hall.

D. Emergency Contact. The Sponsoring Department must maintain a 24-hour on-call roster for the duration of the visit. Both the Student Host and the Minor must be provided with the contact information of a University staff member (Authorized Adult) who is available to respond immediately to emergencies overnight.

VIII. Minors in the Workplace/Classroom

The University understands there may be occasional, unforeseen instances when it is necessary to bring Minors to the workplace; however, this is a privilege, not a right, and must not become regular or routine. The workplace and classroom are not substitutes for childcare and employees are encouraged to consult the remote work policy or use vacation/PTO when childcare is unavailable.

If a parent or guardian brings a Minor to the workplace, they are solely responsible for the Minor's safety and welfare. Parents/guardians must not leave the Minor unsupervised at any time, nor may they leave the Minor in the care of colleagues, students, or subordinates.

Restrictions & Safety:

1. Prohibited Areas: For their own safety, Minors are strictly prohibited from entering high-risk areas, including but not limited to laboratories, machine shops, studios with dangerous equipment, commercial kitchens, construction sites, and University vehicles.
2. Health: Minors with communicable illnesses (e.g., fever, flu) are not permitted in the workplace.
3. Disruption: The presence of a Minor must not disrupt University operations. Supervisors retain the authority to direct an employee to remove a Minor from the workplace if these conditions are not met.

IX. Supervision and Safety Planning

While Policy sets the minimum campus-wide standard for all programs, Program Directors are also required to develop Program-Specific policies to address the unique risks of their activities. The Program Director is responsible for developing, implementing, and enforcing the following for each Program. All Program-Specific policies and the 'Verification of Compliance' (Appendix B) must be reviewed and approved by the divisional Vice President at least 30 days prior to the Program start date.

- a. *Communication and Notification* – A procedure for notifying parents/guardians in case of an emergency, behavioral problems, natural disasters, or other significant program disruptions.
- b. *Medical Treatment, Administration of Medicines and Emergency Services* – A plan and procedure for the administration of medications, including directions that are readily accessible to staff and volunteers on how to summon emergency services.
- c. *Supervision of Minors and Access to University Facilities* – A plan outlining supervision of Minors and what their access to University facilities will be. The plan must establish adult-to-participant ratios commensurate with the Minors' age, skill level, and the inherent danger or complexity of the activities and environment.
- d. *Program Rules of Conduct* – Development of conduct rules, behavior standards, and disciplinary measures.
- e. *Liability Waivers* – Liability releases and consent-to-treat forms must be obtained for all Minors as part of registration.
- f. *Record Retention* – All records related to the Program, including staff certifications, training completion, participant waivers, medical consent forms, and incident reports, shall be retained for a minimum period of time up to four years after the Minor participant reaches the age of 18.

Policy Collaborators:

Contact Information:

History/Revisions: *New*

Appendix A:

Behavioral Expectations for Interacting with Minors

Members of the Butler University community associated with Programs or activities involving Minors must observe the following guidelines. This list is meant to serve as an example of core behavioral expectations to be exhibited at all times. These guidelines are not exhaustive and each Program Director is encouraged to add further explanation or expand this list for various examples that may be present in their specific program.

DO:

1. Immediately report any suspected or actual instance of Minor abuse or neglect to the Indiana Department of Child Services (800-800-5556) and BUPD (317-940-9999).
2. Maintain appropriate physical boundaries at all times.
3. Show an unwavering commitment to ensuring that the welfare of participating Minors is a primary and shared responsibility.
4. Treat all Minors in a group consistently, fairly, and with respect and dignity.
5. Maintain the highest standard of personal behavior at all times when interacting with Minors.
6. Refrain from being alone with a Minor at any time in connection with the program. Try to have another adult present when you are working with Minors in an unsupervised setting.
7. Meet in open, well-lit spaces or rooms with a window observable by other adults, whenever possible.
8. Be aware of how your actions and intentions might be perceived and could be misinterpreted.
9. Consult with other program staff when you feel uncertain about a situation.

DO NOT:

1. Relate to Minors as if they are peers, conduct private correspondence, or take on the role of a confidant.
2. Strike or hit a Minor or use corporal or other punishment involving physical pain or discomfort.
3. Touch a Minor or have physical contact in an inappropriate or illegal manner.
4. Do things that may be seen as favoring one Minor over others, such as giving personal gifts to, or doing special favors for, a Minor.
5. Engage in the use or possession of alcohol, tobacco, or illegal drugs in the presence or vicinity of Minors or provide the same to a Minor.
6. Possess, produce, access or make available to Minors, any sexually explicit images, material, or media.
7. Send electronic messages or video to the Minor without copying the parents/guardians.
8. Attempt to engage in private chat features with Minors in any medium.
9. Provide transportation to a Minor unless doing so is an acknowledged component of a program and within the scope of the responsibilities within that program.
10. Use profanity in the presence of Minors.

Appendix B: Director Verification of Compliance

As the designated Program Director, my signature confirms, and I agree:

1. All Authorized Adults have read and agree to follow the Policy on the Protection of Minors.
2. All Authorized Adults who are required to background checks have received background checks and are cleared for participation.
 - a. I verify that, per the policy, I have checked the sex offender registries for each staff member listed and have communicated any matches to the Vice-President overseeing the department, division, or college operating the University Program.
 - b. I acknowledge that a failure to perform these checks is subject to corrective action up to and including termination of employment.
 - c. For co-sponsored and Non-University Programs, I acknowledge that a failure to perform these checks is subject to corrective action up to and including immediate cancelation of current and future programs.
3. I verify that all necessary background checks have been completed and cleared, and all training requirements have been met in advance of the program start date.

Program Director Name (print): _____

Signature: _____

Date: _____

Vice President Name (print): _____

Signature: _____

Date: _____