Safeguards for Protecting Children on Campus

Keene State College Policies and Procedures

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Section Menu

1.0 Policy Statement

Keene State College values the safety of all people and designs its operations to maximize that safety. However the institution requires additional safeguards when dealing with minors, recognizing the special responsibility undertaken when minors are in our charge. For the purposes of this policy, a minor is defined as anyone under the age of 18.

1.1 Reporting Suspected Incidents of Abuse, Assault, or Neglect of Minor(s)

1.1.1 Obligation to report. All members of the community have an obligation to report such incidents of physical and/or sexual abuse including assault or neglect to campus authorities so that any incidents may be properly investigated. *See Appendices A and B for definitions of neglect and assault and potential indicators of such.*

Some employees may have additional notification and reporting requirements stipulated by their profession and licensure such as staff in the Child Development Center, licensed health care providers, licensed mental health care providers, K-12 teachers, law enforcement and emergency medical staff among others. These employees are referred to below as “mandated reporters.”

1.1.2 How, Where and When to Report. Any community member who suspects a minor child has been the victim of physical abuse, sexual abuse or assault or neglect associated with programs or employees of Keene State College should *immediately* report the concern to the Director of Campus

Safety or designee. In cases where the community member is also a mandated reporter, concurrent reports should be made to external authorities as appropriate while also making a report to the Director of Campus Safety (or designee) to ensure the incident is reported in compliance with the Clery Act.

The Director of Campus Safety (or designee) will make a report to external authorities (local police) as appropriate and then to officials on campus with a legitimate need to know.

Reports should provide specific information describing the behaviors observed or knowledge received, noting dates, times, locations, and persons involved.

1.1.3 Requirements for vendors working on the Keene State campus, its facilities, or supporting its programs. It is our expectation that any vendor or employee of vendors who are working at Keene State College have the same obligation and must report any suspected incident of abuse, neglect or assault to the Director of Campus Safety. Vendors must commit to and demonstrate a communication and training plan to assure all vendor employees are aware of this obligation to report.

1.1.4 Requirements for external parties using Keene State College facilities. Parties outside of Keene State College who choose to use Keene State facilities as the location for their programs or events must agree to comply with all New Hampshire state and all federal laws as well as Keene State College policies. External parties must commit to and demonstrate a communication plan to assure all individuals participating in events held on/in Keene State facilities are aware of this obligation to report suspected incidents of abuse, neglect, or assault of minors.

1.1.4.1 External parties using Keene State facilities to offer programs for participation by minors should have established written plans for safeguarding children (see section 1.2.2). External parties reserving Keene State facilities will be provided with information for contacting authorities both on and off campus for reporting concerns.

1.1.5 Failure to Report Any Keene State College employee failing to report suspected abuse, assault or neglect of minors associated with Keene State or its programs will be subject to disciplinary action up to and including possible termination.

1.1.6 Employees acting in good faith under this policy to report concerns are assured protection from liability. Retaliation against an individual who reports a concern or cooperates in an investigation under this policy is strictly prohibited.

1.1.7 False Claims. Intentionally false claims of abuse or assault are prohibited. No complaint will be considered false solely because it cannot be corroborated. Keene State College reserves the right to discipline members of the College community who intentionally bring false reports.

1.1.8 Confidentiality. Reports, investigations, and outcomes of investigations are to be confidential. Disclosure of such by an employee of the College may result in disciplinary action.

1.1.9 Indirect Disclosures/Handling reports of suspected assault, abuse or neglect disclosed regarding minors not associated with Keene State. Second-hand disclosures are occasionally made to Keene State employees regarding circumstances unrelated to the College, its programs, students, or employees. Reports of this nature may be forwarded to the Director of Campus Safety (or designee) who will determine if an external authority should be notified.

1.2 Mandated Campus Initiatives to Prevent Abuse/Neglect of Minors

1.2.1 Background Checks

It is the policy of Keene State College to perform criminal background checks on all employees working with minors. In addition, the institution will screen all employees against the National Sex Offender Registry. It is important to note that background checks identify only those persons who have been arrested and is not a foolproof means of preventing assault or identifying potential offenders. There may also be a limitation in the amount of information available based on the date an offense was committed.

1.2.2 Campus Requirements for KSC Programs Interacting with Minors.

Any program that provides interaction with minors must have a written plan indicating the level of supervision and security measures that will be provided and the procedures that will be followed to ensure the safety of all participants with specific provisions for those under 18. The written plan must be a formal part of the program and submitted and approved by the department director in charge of that area prior to that activity taking place. The written plan must include

- Detailed plans for child pick-up and drop–off
- Level of supervision for specific age group(s) and indicating ratio of staff to child
- Controlled access to location of the program
- Guidelines for use of images of minor children
- Guidelines for medical emergencies
- Guidelines for other emergencies
- Staff selection, orientation and training

Examples of programs required to draft a written plan include but are not limited to the following: the Child Development Center, residential and commuter sports camps, summer programs such as “Kids on Campus”, Upward Bound, and summer conferences.

For programs that continue, the written plan must be reviewed annually by the program sponsor and area director. The conduct of that annual review should be reflected in the Annual Report associated with the department.

All documentation of written plans should be maintained within the department and will be subject to audit.

Appendix A. Definition of abuse and neglect

New Hampshire state statute, defines an abused child as “…a child who has been:

- Sexually abused;
- Intentionally physically injured;
- Psychologically injured so that said child exhibits symptoms of emotional problems generally recognized to result from consistent mistreatment or neglect;
- Physically injured by other than accidental means.”

New Hampshire state statute defines a neglected child as a child:

- “Who has been abandoned by his parents, guardian, or custodian; or
- Who is without proper parental care or control, subsistence, education as required by law, or other care or control necessary for his physical, mental, or emotional health, when it is established that his health has suffered or is very likely to suffer serious impairment; and the deprivation is not due primarily to the lack of financial means of the parents, guardian or custodian; or
- Whose parents, guardian or custodian are unable to discharge their responsibilities to and for the child because of incarceration, hospitalization or other physical or mental incapacity…”

Appendix B. Indications of possible abuse or neglect

There are a number of indicators that should be considered in determining what may constitute abuse or neglect.

1. Indicators of Sexual Abuse:
    - Genital pain/itching/odors; diagnosis of a sexually transmitted disease; frequent urinary or yeast infections;
    - Torn / Stained / Bloodied under clothing;
    - Seductive behavior;
    - Abrupt changes in child’s typical behavior and attitudes;
    - Sleep disturbances, including nightmares and fear of sleeping alone or

in the dark;
    - Depression or excessive crying;
    - Regression to behavior common at an earlier age such as: thumb sucking, bedwetting, needing a bottle, or soiling pants;
    - Nervous or aggressive behavior towards adults;
    - Unusual reaction to (or fear of) a specific person;
    - Extreme fears or phobias;
    - Expressing explicit sexual knowledge beyond the child’s age level;
    - Drop in school grades or participation in activities;
    - Self-destructive behavior (i.e. substance abuse);
    - Running away;
    - Sexual “play” behavior;
    - Coercive sexual “play” behavior;
    - Displaying an unusual interest in the genitals of peers, adults or animals;
    - Withdrawal or isolation from friends;
    - Difficulty walking or sitting.
2. Indicators of Physical Abuse. The following may be indicators of physical abuse:
    - Extensive bruises, especially bruises of different colors indicating various stages of healing
    - Burns of all types, but especially cigarette burns and glove-like or immersion bruises;
    - Bruises on multiple body parts or in the shape of an object.
    - Frequent complaints of soreness or awkward movement as if caused by pain;
    - Sleep disturbances: nightmares;
    - Dramatic change in appetite;
    - Enuresis (bed--wetting) or encopresis (involuntary soiling of self);
    - Compulsive and repetitive acts for self-soothing and control;

- Fixation on security item;
- Social withdrawal: avoids physical contact with others;
- Aggressive acting out;
- Bizarre or self-destructive acts; destructive behavior; cruelty to animals;
- Anxiety, flinches when touched; hyper vigilance;
- Depressed: impaired capacity to enjoy life;

3. Indicators of Emotional Abuse. The following may be indicators of emotional abuse:
    - Constant self-berating or belittling.
    - Inability to play as most children do
    - Sleep problems
    - Antisocial behaviors
    - Lags in emotional and intellectual growth
    - Self-destructive feelings or behavior
4. Indicators of Neglect. The following may be indicators of neglect:
    - Back of infant’s head lacks hair or appears flattened;
    - Untreated rashes;
    - Failure to thrive: underweight, significant developmental delays;
    - Constant fatigue;
    - Unattended physical problems or medical needs;
    - Listless, poor responsiveness (does not often smile, cry, laugh, play, relate to others), lacks interest and curiosity;
    - Consistently dirty;
    - Chronic hunger;
    - Inadequate dress for weather;
    - Lack of supervision or child is left with inadequate caretaker
    - Unsafe housing / living arrangements
    - Abandonment

The above indicator lists are not exhaustive.

Approved by Keene State President's Cabinet, 4/2/2013