



**THE GEORGE
WASHINGTON
UNIVERSITY**
WASHINGTON, DC

Responsible University Official: Senior Associate Vice President for Safety and Security
Responsible Office: Division of Safety and Security
Last Revised Date: October 12, 2018

PROTECTION OF MINORS

Policy Statement

The university is committed to the safety and well-being of all members of its community, including minors (individuals under 18 years of age) and children (defined under District of Columbia law as minors under the age of 16). This policy establishes guidelines and procedures to promote the protection of minors and includes specific protections for children as required under District of Columbia law. The university expects all members of the university community to adhere to and act in accordance with this policy.

Reason for Policy

The university offers programs and activities that minors attend and in which they participate. The university also allows non-university organizations to use university facilities for programs and activities involving minors. This policy addresses the protection and safety of minors in these programs and activities and establishes procedures for reporting known or suspected abuse or neglect of minors.

Who is Governed by this Policy

Faculty, staff, and students, and non-university individuals and organizations that use university facilities for programs and activities involving minors or participate in GW- sponsored activities involving minors on or off campus.

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Policy

Responsibilities

Members of the university community interact with minors in a variety of ways, including as prospective and enrolled students, employees, interns, visitors, and participants in programs, activities, or research. These interactions may occur at any university location or during any university-sponsored program or activity off campus. Members of the university community who engage in these interactions with minors must be diligent in protecting their safety and must report any known or suspected abuse or neglect in accordance with this policy. Members of the university community should review Best Practices for Interacting with Minors in Appendix A and Signs of Child Abuse and Neglect in Appendix B.

Faculty and staff working with non-university individuals and organizations that use university facilities for programs and activities involving minors are responsible for making those individuals and organizations aware of this policy. Non-university individuals and organizations that use university facilities for programs and activities involving minors are required to comply with this policy.

Reporting Abuse or Neglect of Minors

Every member of the university community who knows, suspects, or receives information indicating that a minor has been or is being abused or neglected must report this information to the university. In the case of an emergency or imminent threat, members of the university community must immediately call the George Washington University Police Department (GWPD) at (202) 994-6111 and may also call law enforcement at 911. In non-emergency situations, members of the university community should promptly contact the GWPD at (202) 994-6110 or the university official responsible for the department or area in question. Reports may also be made to the Compliance and Privacy Office at (202) 994-3386 or confidentially through the university’s toll free, 24-hour Regulatory Compliance Help and Referral Line at (888) 508-5275. The university official or office receiving such information must promptly notify the GWPD. No one making a good faith report of suspected abuse or neglect of a minor will be retaliated against, in accordance with the [Non-Retaliation Policy](#).

Every member of the university community who has knowledge of sexual abuse of a minor (which includes children), or has reason to believe that sexual abuse of a

minor has occurred, must report such knowledge or belief to the university. Members of the university community may also report such knowledge or belief to law enforcement by calling 911 or the appropriate social services agency. Under District of Columbia law, every individual who has knowledge of sexual abuse of a child, or has reason to believe that sexual abuse of a child has occurred, must immediately report such knowledge or belief to law enforcement by calling 911 or the District of Columbia Child and Family Services Agency. These reports should be made notwithstanding any belief that the child or minor has consented to conduct, because the law may not recognize consent as a defense.

The District of Columbia Child and Family Services Agency operates a confidential 24/7 hotline at (202) 671-SAFE or (202) 671-7233. The Virginia Department of Social Services operates a statewide 24/7 Child Protective Services hotline at (800) 552-7096 (for Virginia) or (804) 786-8536 (for outside of Virginia). Contact information for Maryland's local departments of Child Protective Services is available at the general information number at (800) 332-6347.

Additionally, applicable state and local laws require individuals working in certain designated occupations and professions ("mandatory reporters") to report abuse or neglect. Mandatory reporters have a legal duty to report known or suspected abuse or neglect of a minor to law enforcement, social services agencies, and/or their institutions. Depending on applicable state and local laws, designated occupations may include certain health care providers, child care providers, teachers, counselors, social workers, and athletic coaches. University employees are responsible for knowing whether they are mandatory reporters and for complying with their legal obligations. If employees are uncertain whether they are mandatory reporters, they may consult with the Office of the Senior Vice President and General Counsel.

Background Checks

The university has a [Background Screening and Professional Reference Checks Policy](#) that requires background screening for certain university employees and contractors. The university may require additional background screenings or additional information it deems appropriate.

Enforcement

The university may take corrective actions for violations of this policy, including but not limited to appropriate disciplinary action in accordance with university policies and procedures, termination of contracts, and prohibiting an organization or individual from using university facilities. The university may also take interim actions to protect the safety of any involved minors.

Definitions

Abuse or Neglect of Minors means any act or failure to act that results in physical or emotional harm, sexual abuse or exploitation, or an act or failure to act that presents an imminent risk of serious harm to a minor.

Physical abuse is non-accidental physical harm or injury.

Emotional abuse is a pattern of behavior that impairs a minor's psychological or intellectual functioning or emotional development.

Sexual abuse of a child is (i) conduct by an individual at least four (4) years older than a child to engage in or attempt to engage in a sexual act or sexual contact with that child, cause or attempt to cause that child to engage in sexually explicit conduct, or expose that child to sexually explicit conduct; or (ii) conduct by an individual of any age to engage in sexual contact with a child without the child's consent.

Sexual abuse of a minor is (i) conduct by an individual in a position of trust with or authority over a minor to engage in or attempt to engage in a sexual act or sexual contact with that minor; or (ii) conduct by any individual to engage in sexual contact with a minor without the minor's consent.

Neglect is the failure of a parent, caregiver, or other person who has responsibility for a minor to provide for the basic physical, medical, educational, or emotional needs of the minor.

Child means any person under the age of 16.

Minor means any person under the age of 18.

Related Information

[Background Screening](#)

[Non-Retaliation Policy](#)

[Signs of Child Abuse and Neglect](#)

[Sexual and Gender-Based Harassment and Interpersonal Violence Policy](#)

[Mandatory Reporters of a Child Abuse and Neglect](#)

[Recognizing Child Abuse and Neglect: Signs and Symptoms](#)

Appendix A

Appendix B

Contacts

Contact	Telephone	Email
GW Police Department	202-994-6110	gwpcd@gwu.edu
Office of the Senior Vice President and General Counsel	202-994-6503	gwlegal@gwu.edu

Document History

- **Last Reviewed Date:** October 12, 2018
 - **Policy Origination Date:** September 9, 2013
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Who Approved This Policy

Mark Diaz, Executive Vice President and Chief Financial Officer

Forrest Maltzman, Provost and Executive Vice President for Academic Affairs

Beth Nolan, Senior Vice President and General Counsel

*This policy, as well as all **university policies**, are located on the **Compliance Office website**.*

Appendix A

Best Practices for Interacting with Minors

Members of the university community participating in programs or activities involving minors should observe the following “dos” and “don’ts” in order to maintain a safe and positive experience. When interacting with minors:

DO:

- Maintain the highest standards of professional behavior at all times.
- Act as a positive role model for minors and behave in a caring, respectful and responsible manner.
- Be friendly and supportive within the context of the program or activity while maintaining appropriate boundaries.
- Whenever possible, have another adult present. If a one-on-one interaction is required, try to meet in an open room or area observable by other adults.
- Always treat all minors in a group consistently and fairly, and with respect and dignity.
- Maintain discipline and discourage inappropriate behavior by minors, consulting with supervisors or colleagues if you need help with misbehaving minors.
- Be aware of how your actions and intentions might be perceived and could be misinterpreted.
- Consult with other supervisors or colleagues when you feel uncertain about a situation.
- Obtain permission from a parent or guardian before taking photographs or videos of minors and then only to meet the objectives of the specific program or activity.

DO NOT:

- Spend significant time alone with one minor away from the group or conduct private interactions with minors in enclosed spaces or behind closed doors.
- Conduct private correspondence with minors or invite minors to your home unless it is a part of the program or activity.
- Engage in any abusive or offensive conduct of any kind towards or in the presence of a minor, including but not limited to striking, spanking, poking, or restraining.
- Behave in a manner that is intended to shame, humiliate, belittle, or degrade minors, or engage in any other form of emotional abuse.
- Engage in inappropriate touching or unauthorized physical contact with a

minor.

- Use inappropriate language, tell sexual jokes, or make sexually suggestive comments around minors, even if minors themselves are doing so.
- Provide sexual materials to minors or assist minors in any way in obtaining such materials.
- Provide alcohol or drugs to minors or use alcohol or drugs in the presence of minors.
- Take photographs or videos of minors with a personal camera or cell phone.

Appendix B [[Signs of Child Abuse and Neglect](#)]



Nationally and in the District of Columbia, most reports and substantiations of child maltreatment are neglect, followed by physical abuse and sexual abuse.

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

Physical signs may include:

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

Behavioral signs may include:

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

Physical abuse is non-accidental injury of a child by a parent or caretaker.

Physical signs may include:

- Bruises, welts, or swelling.
- Sprains or broken bones.
- Burns.
- Lacerations or abrasions.
- Bite marks.
- Unexplained or repeated injuries.

Behavioral signs may include:

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

Sexual abuse is exploitation of a child for the sexual gratification of an adult or older child.

Physical signs may include:

- Difficulty walking or sitting.
- Torn, stained, or bloody clothing.
- Genital pain or itching.
- Sexually transmitted diseases.
- Pregnancy.

Behavioral signs may include:

- Precocious sexual knowledge or behavior.
- Extremes—hostile and aggressive or fearful and withdrawn.
- Self-mutilation.
- Substance abuse.
- Running away.



To report child abuse and neglect in the District, call 202-671-SAFE.

D.C. Child and Family Services Agency • 400 6th Street SW, Washington, DC 20024-2753 • (202) 442-6100 • www.cfsa.dc.gov

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