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PROTECTION OF MINORS POLICY

Purpose

NewU University enrolls high school students in its college courses through dual enrollment, and some of those students are under 18. This Policy sets the rules that protect them: who may interact with them and how, how classes that include them are run and recorded, what every member of the University community must report and to whom, and the orientation required before anyone teaches them.

Scope

This Policy applies in every University program, course, platform, system, and setting in which a Minor participates, online or in person, and to all directors, officers, employees, faculty (including faculty engaged as independent contractors), staff, volunteers, vendors, and students. Instruction is currently delivered online; the in-person provisions apply whenever a Minor is present at a University facility or activity. This Policy supplements the University's Students and Faculty Interactions, Harassment, Sexual Misconduct, and Code of Student Conduct policies and controls where a participant is a Minor. A prospective student known to be a Minor is treated under the communications rules of this Policy.

Definitions

Minor. A person under 18 years of age. The University enrolls no student under the age of 15.

Covered Adult. Any director, officer, employee, faculty member, contractor, volunteer, or vendor acting for the University.

Adult Student. An enrolled student 18 years of age or older.

One-on-One Interaction. Any private interaction between one adult and one Minor, in any medium.

Minors in University Courses

Minors participate in University courses through dual enrollment with partner institutions, including NewU Dual Academy, and sit in the same course sections as Adult Students. Course content remains at college level for every student. Faculty are informed which students in their sections are Minors and treat that information as confidential; the identity of a student as a Minor is shared within the University on a need-to-know basis. Parents and legal guardians of Minors receive this Policy at enrollment.

Permitted Academic Interactions

The following are permitted and encouraged, conducted on University platforms and accounts: office hours, tutoring, and academic help, individually or in groups; substantive feedback and praise tied to a student's work; academic, transfer, and career advising; letters of recommendation and transfer support provided through University channels; class discussion, breakout rooms, group projects, study groups, and peer review, including faculty-assigned project teams that place Adult Students and Minors together; and institutional recognition and awards. Members of a project team communicate about the work through University accounts, including one-on-one. Nothing in this Policy requires a Covered Adult or an Adult Student to avoid, ignore, or refuse ordinary academic contact with a Minor.

Conduct with Minors

Interaction between Adult Students and Minors in shared classes is a normal and valued part of a NewU University education. Minors and Adult Students discuss, collaborate, and work in groups together in class sessions, breakout rooms, and course activities, and are held to the same academic standard. This Policy regulates the channel and the conduct, not the collaboration.

All adults, Covered Adults and Adult Students alike:

- do not pursue romantic or sexual conduct of any kind with a Minor; such conduct is reported under this Policy and to the authorities;
- do not initiate private off-platform contact with a student they know or reasonably believe to be a Minor (personal direct messages, social media follows, personal phone, email, or messaging apps, or private meetings); collaboration and communication with a Minor run on University platforms;
- do not provide or facilitate alcohol, tobacco, cannabis, or any illegal substance to a Minor;
- do not transport a Minor, except a Covered Adult acting with the written consent of the Minor's parent or legal guardian.

Covered Adults additionally:

- conduct all communication with a Minor through University-provided accounts and systems, never through personal email, personal phone, personal messaging apps, or personal social media;
- do not photograph or record a Minor except through the University's standard class recording described below;
- do not arrange to meet a Minor off platform;
- do not give a Minor gifts of meaningful value, money, or loans, and do not single out a Minor for excessive personal attention.

One-on-One Interactions and Communications

One-on-one academic contact with a Minor is permitted and is conducted so that it is observable and interruptible: it takes place on University platforms and accounts, is scheduled through the University calendar so it is visible to academic administration, and occurs in settings the University records or can review. Individual electronic communication with a Minor runs on University systems, where it is retained and reviewable; a Covered Adult does not hold an unscheduled private video session or private chat with a Minor. Group channels that include Minors are moderated by the instructor or another Covered Adult.

Social Media and Professional Networks

Covered Adults and Adult Students do not connect with an enrolled Minor from personal accounts on any social media or messaging platform: no friending, following, connection requests, or direct messages. This includes professional networks such as LinkedIn while the student is a Minor. A Covered Adult who receives a connection request from a Minor declines it or leaves it pending, tells the student why, and invites the student to connect once the student is 18; a letter of recommendation through University channels is the substitute in the meantime. Institution-run public accounts may be used for program communication under the University's direction.

Virtual Classroom and Recordings

Class sessions are recorded by the University: video, audio, and material presented on screen. Recordings are stored in the University's Google Workspace for Education environment with restricted sharing; access is limited to the instructor, the students enrolled in the section, and designated academic administrators of the University and the dual enrollment partner. Recordings are retained for one academic year and then deleted, unless preserved for an investigation or as required by law. Recordings are not used for marketing and are not used to train artificial intelligence or machine learning models. No student, family member, or other participant makes an independent recording, capture, or redistribution of a class session or its materials; violations are addressed under the Code of Student Conduct and the responsible institution's policies.

In-Person Settings

When a Minor is present at a University facility or activity, a Covered Adult avoids being alone with the Minor in a closed or unobservable space; where an individual meeting is necessary, it occurs in an observable, interruptible setting. Supervision arrangements follow the hosting institution's procedures.

Background Screening

A Covered Adult whose role includes instructional or recurring contact with Minors completes a background check under the University's background check procedures as a condition of the engagement, on the timing set in the person's employment or engagement terms.

Compliance Orientation

Before first instructional contact with a course section that includes a Minor, and annually thereafter, every faculty member and student-facing staff member completes the University's safeguarding compliance orientation, covering this Policy, mandated reporting, the one-on-one and communications rules, the recording rules, and the confidentiality of student records. A volunteer or vendor whose role involves recurring contact with Minors completes the orientation before that contact begins. The University also directs faculty and staff to the District of Columbia's mandated reporter training, which District law requires of mandatory reporters (D.C. Code § 4-1321.08). The University documents completion. The orientation addresses legal and policy compliance; it is not instruction in teaching methods.

Adult Students are not required to complete the orientation. They receive notice of this Policy at enrollment and at the start of each term, and its rules bind them through the Code of Student Conduct whether or not any individual notice is given.

Mandated Reporting

Any person who has reasonable cause to suspect abuse or neglect of a Minor makes a report immediately:

- Immediate danger: call 911.
- District of Columbia: the Child and Family Services Agency at 202-671-SAFE (7233), or the Metropolitan Police Department. D.C. Code § 4-1321.02 makes teachers and school officials in the District mandated reporters.
- A Minor residing in another state: the child protection authority of the Minor's state of residence. The University maintains, with its dual enrollment partners, a current list of state reporting contacts.
- Online exploitation: the NCMEC CyberTipline, 1-800-843-5678.

In parallel, the reporter notifies the University at hr@newu.edu. Internal notification does not delay or substitute for the external report. The reporter does not investigate; investigation belongs to the authorities. Reports made in good faith are protected even if unsubstantiated.

Interim Measures and Discipline

The University may immediately restrict any person's access to classes, systems, and students while a report or suspected violation is reviewed. Violations by students are addressed under the Code of Student Conduct, by employees under the applicable handbook, and by contractors under their agreements, up to dismissal or termination of the relationship and referral to law enforcement.

Student Records of Minors

University education records are postsecondary records. Under the Family Educational Rights and Privacy Act, the rights in those records belong to the student from enrollment, regardless of age, as set out in the University's Confidentiality of Student Records policy. Inquiries from parents and legal guardians about a student's records, grades, or performance go to the University at registrar@newu.edu; faculty and staff forward any such inquiry there and do not respond to the parent directly. Where the student has signed a written release, the University responds under it; where no release exists, no response is made unless the University sanctions it first or the law permits disclosure, including in a health or safety emergency.

Coordination with Dual Enrollment Partners

The University and each dual enrollment partner coordinate safeguarding: parallel reporting where required, prompt mutual notification of incidents and protective measures involving a shared student, and information sharing limited to what the response requires and what the law permits.

No Retaliation

Retaliation against anyone who reports a concern in good faith or participates in a review is prohibited and is itself a violation of this Policy.

Administration and Review

The Office of the President administers this Policy, may issue procedures under it, and reviews it at least annually. Questions and reports: hr@newu.edu. A report or concern involving the President or the administrator of this Policy goes to the Chair of the Board of Trustees.

[End]