

Campus Administrative Policy**Policy Title:** Child Protection PolicyPolicy Number: 3001 Functional Area: General Administration

Effective: April 1, 2018

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Approved by: Donald M. Elliman, Jr.
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Senior Vice Chancellor for Administration and FinanceApplies to: CU Anschutz
CU Denver
CU South Denver

A. INTRODUCTION

The University of Colorado Denver | Anschutz Medical Campus and related locations offer many educational programs specifically for children. Operating programs for children creates obligations for the campuses and a concurrent need to ensure that such programs are *in* compliance with Board of Regent, university policy and state and federal law.

B. POLICY STATEMENT

Minors visiting University facilities and participating in University sponsored programs and activities require particular vigilance in order to protect their safety and well-being. This policy sets forth the expectations for university student, faculty, staff, and volunteers, as well as nonaffiliated individuals and organizations who operate programs using university facilities that involve interaction with minors. This policy and related appendices are intended to adhere to [University of Colorado Administrative Policy Statement # 7009](#) concerning the protection of children participating in university-run and

university-contracted programs.

C. PROCEDURES

1. Each Program for Children must designate an individual who is responsible for ensuring that the protocol and procedures of this policy are followed. The designated campus and/or location administrators are:
 - a. The Chancellor of the University of Colorado Anschutz Medical Campus designates the Director of Initiatives and Outreach (Neil.Krauss@ucdenver.edu) as the campus administrator responsible for tracking and reviewing Programs for Children and/or contracts with Unaffiliated Program Operators.
 - b. The Chancellor of the University of Colorado Denver designates the Associate Vice Chancellor, Student and Community Engagement (Genia.Herndon@ucdenver.edu) as the campus administrator responsible for tracking and reviewing Programs for Children and /or contracts with Unaffiliated Program Operators.
 - c. The Vice Chancellor for Enterprise Development overseeing the CU South Denver has designated the Director of Sales & Business Operations (Tina.Schlichte@ucdenver.edu) as the campus administrator responsible for tracking and reviewing Programs for Children and/or contracts with Unaffiliated Program Operators.
2. Each Program Operator must provide to the designated campus or location official a completed form (see appendix) that will communicate the following:
 - Campus department sponsoring the program
 - If applicable, name of the unaffiliated program or group
 - Nature of the program
 - Program's dates, duration and location
 - Approximate number and age range of children
 - Background check certification
 - Protocol review certification
3. Each Program Operator must develop forms governing program registration and operation and provide such forms to the campus administrator.
4. Each Program Operator must conduct a criminal and National Sex Offender Registry background check on each university faculty, staff, student, and volunteer who will be working with children. Individuals with criminal convictions may be prohibited from participating in programs for children. Please send all requests for background checks to HR.backgrounds@ucdenver.edu.
5. Each Program Operator must review and share with all program personnel who are supervising children, at a minimum, the Behavior Dos and Don'ts in Appendix A.

6. Each Program Operator must positively attest on the Program Operator form that the Dos and Don'ts have been reviewed with all personnel who are working with children.
7. Colorado law requires those individuals listed in Appendix C who have reasonable cause to know or suspect that a Child has been subjected to abuse or neglect or who have observed the Child being subjected to circumstances or conditions that would reasonably result in abuse or neglect to immediately report such information to Child Protective Services, local law enforcement, or the Colorado Child Abuse Reporting Hotline (1-844-CO-4-KIDS).

If a Child is on the University Campus the appropriate law enforcement agency to contact is the University Police at 303-724-4444. If the Child is not on the University Campus, local law enforcement may be contacted by calling 911.

Any individual not listed in Appendix C may report known or suspected child abuse or neglect or any circumstances or conditions which might reasonably result in child abuse or neglect to Child Protective Services, local law enforcement or the Colorado Child Abuse Reporting Hotline.

8. All Program Operators who contract or utilize services with unaffiliated programs must notify such Unaffiliated Program Operators that they must comply with this Campus Policy for the Protection of Children.
9. All Program Operators must at a minimum include in their agreements with Unaffiliated Program Operators insurance and indemnification terms as outlined in APS 7001-Insurance and Indemnification Requirements for Use of Facilities by Non-University Groups, and that the Unaffiliated Program Operator will submit to a compliance audit upon request. Additional coverages may be recommended based on program activities. Contact urmuccdirs@cu.edu with insurance questions.

D. DEFINITIONS

1. *Abuse or Neglect:* Abuse includes a non-accidental physical, sexual, or emotional injury to a Child that is caused by the acts or omissions of another person. Neglect includes the failure of the Child's guardian to prevent Abuse and or take action to provide adequate food, clothing, shelter, medical care or supervision.
2. *Child or Children:* Individuals under the age of 18 years, who are not current students.
3. *Program for Children:* A campus program operated exclusively or primarily for Children left in campus care without parent or guardian supervision and that requires registration.

4. *Program Operator*: A campus unit that operates a Program for Children or that contracts with an unaffiliated Program Operator to operate a Program for Children.
5. *Unaffiliated Program Operator*: A third party who enters into an agreement with the campus to operate its own Program for Children using University facilities.

Notes

1. Dates of official enactment and amendments:
April 1, 2018: Adopted by the Chancellors
2. History:
April 1, 2018: Created to comply with [University of Colorado Administrative Policy Statement # 7009](#) concerning the protection of children participating in university-run and university-contracted programs.
August 31, 2018: South Denver Location contacts updated and format changes
March 24, 2018: South Denver Location contact updated
3. Initial Policy Effective Date: April 1, 2018
4. Cross References/Appendix:
 - University of Colorado [APS 7009 Protection of Children Participating in University-Run and University-Contracted Programs for Children](#)
 - University of Colorado [APS 5014 Sexual Misconduct](#)
 - [Campus Sexual Misconduct Procedures](#)
 - University of Colorado [APS 5050 Background Checks](#)
 - University of Colorado [Risk Management Volunteer, Trainee and Minor Participants](#)
 - Appendix A, Protocol for Protection of Children Participating in Program for Children on Campus
 - Appendix B, Notice of Program with Participation of Children
 - Appendix C, Individuals required by [Colorado Law to Report Child Abuse or Neglect](#)

Appendix A

Protocol for the Protection of Children Participating in Program for Children on Campus

- Conduct federal criminal and National Sex Offender Registry background checks on all faculty, staff and students who will be working with children
- Fill out program description template, indicate all personnel who will be working with children and indicate that all such personnel have passed background checks and have reviewed training material
- Know the reporting requirements for persons who suspect that a child participating in a program for children is being abused or neglected
- Review Dos and Don'ts with all supervising personnel

Behavioral standards

Please use these “Dos and Don'ts” guidelines to train all supervising personnel as an acknowledgement and a condition for providing services to minors.

Do

- Maintain a high standard of personal behavior when interacting with minors.
- Treat minors consistently, fairly and with consideration, respect and dignity; listen and interact with minors and provide positive reinforcement.
- Be friendly but maintain appropriate physical boundaries and only touch minors when necessary and only in ways that are appropriate, public and non-sexual; be aware of how others might perceive or misinterpret your actions or intentions.
- Maintain discipline and discourage inappropriate behavior by minors.
- Consult with adult supervisors when uncertain about a situation or need help with misbehaving minors.
- Comply with mandatory reporting regulations and cooperate fully in any investigation of abuse of minors.

Don't

- Be alone with a minor. If one-on-one interaction is necessary, the interaction must take place in an area visible to others to ensure there is no opportunity for privacy.
- Enter a facility in use by a minor such as a bathroom, locker room, residence hall room, or similar area without another adult present; **do** utilize buddy system where minors of same sex accompany each other.
- Sleep in the same accommodations with a minor, unless you are a parent or guardian of the minor.
- Engage in communications with minors via email, texting, Facebook, Twitter or similar forms of electronic or social media unless it is related to the program and another adult is included on the communication.
- Have contact with a minor outside of the program (e.g., babysitting, home visits).

- Provide transportation to a minor participating in the program who is not your own unless doing so is an acknowledged component of a program—minors may be transported by Public Safety in university vehicles and via ambulance.
 - Smoke, use tobacco products, possess or be under the influence of alcohol, marijuana or illegal drugs at any time while working with minors; provide alcohol, marijuana or illegal drugs to any minor.
 - Provide prescription or over-the-counter medication to any minor unless specifically authorized in writing by the parent/guardian as being required for the minor’s care or the minor’s emergency treatment.
 - Make sexual materials in any form available to minors or assist them in any way in gaining access to such materials; behave in a manner that is sexually provocative.
 - Give gifts to minors independent of gifts provided by the program.
 - Take photos or videos of a minor with personal cell phones or cameras where privacy is expected (showers, restrooms).
 - Engage in abusive conduct; hit, physically assault or inappropriately touch minors; use language or provide inappropriate, profane, offensive or abusive comments; shame, belittle or degrade minors or perpetrate any form of emotional abuse.
- Assess the risk of the minor activities.
- identify supervisor/program leaders for the program
 - identify any required skills and physical requirements
 - Identify any safety equipment and training requirements. Confer with Environmental Health & Safety on laboratory safety training requirements e.g. blood-borne pathogen, hazardous chemicals.
 - e.g. UCD Minors in Laboratories and Animal Facilities Policy
- Identify all training requirements for minors.
- safety training based on risk assessment
 - HIPAA, FERPA
 - sexual harassment, non-discrimination and standards of conduct
 - alcohol, drug use and smoking in the workplace
 - confidentiality and computer use guidelines
 - emergency response requirements
 - other university and campus policies, procedures, and guidelines applicable to the services to be performed
- Program considerations: work in partnership with parents/guardians.
- understanding of emergency protocols (medical emergencies, missing minors)
 - contact information for the program supervisor, public safety, point person and information on how to initiate a complaint or concern
 - method to provide information on major developments occurring in the program
 - provide program schedules, activities and understanding of who is responsible for transportation, free time oversight; whether parent/guardian will accompany the minor

- Provide an orientation, any safety instructions, training, and ongoing supervision and support to manage the minor and the program.

Appendix B

Notice of Program with Participation of Children

Form Requirements	Program Information		
Program name			
	Information required	Background OK (Y/N)	Reviewed Dos and Don'ts
Program Operator Contact who's responsible for compliance with this policy			
Contact			
Title			
Email address and phone number			
Program personnel who will be working individually with minors, criminal background check affirmation and training review	Name	Background ok? (Y/N)	Review Dos and Don'ts (Y/N)
Program date(s) and location			
Nature and description of program			
Approximate number and age of participating children			
ATTESTATION: I have reviewed the Child Protection Policy and ensure that all individuals working with children have passed the required background checks and have reviewed the Dos and Don'ts in this policy.			
Policy Contact Attestation (signature)			

Appendix C

These individuals are required by [Colorado Law to Report Child Abuse or Neglect](#).

- Any commercial film and photographic print processor
- Any physician or surgeon, including a physician in training
- Child and family investigator
- Child Health Associate
- Chiropractor
- Christian Science Practitioner
- Commercial film and photographic print processor
- Dental Hygienist
- Dentist
- Director, coach, assistant coach, or athletic program personnel employed by a private sports organization or program.
- Educator providing services through a federal special supplemental nutrition program for women, infants, and children as provided for in 42 U.S.C. sec. 1786
- Emergency medical service providers
- Firefighter
- Hospital personnel engaged in the admission, care, or treatment of patients
- Juvenile parole and probation officer
- Licensed Marriage and Family Therapist
- Licensed Professional Counselor
- Medical examiner or coroner
- Mental Health Professional
- Naturopathic doctor
- Officers and agents of the state bureau of animal protection and animal control officers
- Osteopath
- Peace Officer
- Person who is registered as a psychologist candidate, marriage and family therapist candidate, or licensed professional counselor candidate
- Pharmacist
- Physical Therapist
- Podiatrist
- Priest, Rabbi, or duly ordained, commissioned, or licensed minister of a church, member of a religious order, or recognized leader of any religious body
- Psychologist
- Public or private school official or employee
- Registered dietician
- Registered Nurse or Licensed Practical Nurse
- Registered Psychotherapists
- Social Worker or worker in any licensed facility or agency
- Social worker, licensed clinical social worker, clinical social worker, licensed marriage and family therapist, licensed professional counselor, addiction counselor, or certified addiction counselor

- Veterinarian
- Victim's Advocate
- Worker in the state department of Human Services

For the most up-to-date list, please visit [CO Rev Stat § 19-3-304 \(2016\)](#)