



**PROCEDURES
FOR THE PROTECTION OF MINORS ON
UNIVERSITY PREMISES AND IN UNIVERSITY
PROGRAMS**

Responsible Department: Enterprise Risk Management

Effective Date: January ____, 2023

I. PURPOSE

These Procedures implement the requirements set forth in University Policy RISK 2.50.060 - *Protection of Minors on University Premises and in University Programs* (the "Policy").

II. SCOPE

These Procedures apply to all members of the University Community who work or interact with Minors in University Programs. If there is a conflict between these Procedures and requirements imposed by law on any University Program (for instance, laws relating to early childhood and elementary school programs, reporting of child abuse and neglect, or the Clery Act, or laws requiring the reporting of Child Abuse), the requirements imposed by law supersede these Procedures.

III. PROCEDURES APPLYING TO INTERACTIONS WITH MINORS ON THE UNIVERSITY OF DENVER CAMPUS

A. Expectations.

Members of the University Community are expected to be familiar with and comply with the provisions of this Policy and any related University policies and/or procedures, as applicable.

1. When participating in University Programs, members of the University Community must:
 - Comply with all requirements of these Procedures and University Policy RISK 2.50.060 – *Protection of Minors on University Premises and in University Programs*.
 - Be vigilant in protecting the well-being and safety of Minors with whom they interact on or off University Premises and Minors involved in

University Programs.

- Be familiar with University safety and security procedures and procedures for handling emergencies.
- Report promptly suspected or actual instances of Child Abuse of any Minor on University Premises or any Minor in a University Program.
- When required by Colorado law, report to appropriate state or local government officials suspected or actual instances of Child Abuse.

B. Training.

1. For University Programs that are not licensed childcare providers, the University has selected a series of web-based training courses developed by United Educators on the Protection of Children on Campuses (“Training”). Training for various roles is available to members of the University Community via the United Educators [website](#).

All members of the University community may access all of the training courses available through the learning path noted below; provided, however, that an individual working with minors will be required to take specific courses within the group of available courses depending upon the individual’s role. The Office of Enterprise Risk Management will assist the program supervisors in identifying which of the training materials are required (vs. optional) for each role.

To access the United Educators training, follow these steps:

- a) Go to <https://learn.ue.org/1K1ST289902/DUMinors>
- b) Complete the Registration form.
 - Enter your first name, last name, and email address and click Register.
 - You will receive a welcome email with your username and a temporary password.
 - Follow the link in the email to sign on.
 - You will be prompted to:
 - i. Enter your temporary password
 - ii. Create a new password
 - iii. Create and answer a security question

You will receive a confirmation email upon successful completion of each course (a copy of which you will be able to provide to your program supervisor).

Note: For users who completed previous trainings through United Educators:

- go to <https://learn.ue.org/Login2.aspx>

- i. Enter your login credentials.
 - ii. Username: Your DU email address
 - iii. Password: Your unique password
 - iv. If you forgot your password, you can reset it using the “Forgot Password” link.
2. For those University Programs that are licensed childcare providers (e.g. P.A.S.S. Camp, Ricks Center for Gift Children, and Fisher Early Learning Center), staff will be assigned, and must complete, training required by the State of Colorado Office of Early Childhood.
3. *University Programs.*
 - a. The following members of the University Community must successfully complete required Training before interacting with Minors in University Programs:
 - individuals who regularly spend time with Minors as part of their responsibilities;
 - individuals who directly supervise those who regularly spend time with Minors; and
 - individuals who supervise overnight stays by Minors as part of their responsibilities.
 - b. Assigned Training must be completed before participating in any University Program.
 - c. Program directors and supervisors are required to oversee compliance with these minimum training requirements.
4. *Third-Party Programs.* Program staff working in Third-Party Programs may not work or interact with Minors in a University Program until the director of the program certifies in writing to the Office of Enterprise Risk Management that all program staff have successfully completed training on the Protection of Minors (at least comparable to the Training provided by the University). The director must also agree that any subsequently assigned or hired program staff will successfully complete training prior to working or interacting with Minors in a Third-Party Program.

C. Background Checks.

The requirements in this section apply to all University Programs.

1. *University Programs and Members of the University Community.* The following members of the University Community must undergo a Background Check before regularly interacting with Minors in University Program(s):

- a. Individuals who participate in University Programs as part of their responsibilities;
- b. individuals who directly supervise University Programs; and
- c. individuals who supervise overnight stays by Minors as part of their University Program responsibilities.

Background checks may not be required for individuals whose only contact with Minors is in the context of an occasional event that is conducted entirely in public, or in other circumstances where it is unreasonable to require a background check, as determined by the Office of Enterprise Risk Management.

The director or supervisor of each University Program must confirm that program staff that fall into the categories identified in subparagraphs a-c above have each completed a Background Check in accordance with University Policy RISK 12.10.020 – *Background Checks*.

2. *Third-Party Programs.*

- a. The University department sponsoring any Third-Party Program must obtain the Third-Party Program organizer's agreement to comply with University Policy RISK 2.50.060- Protection of Minors on University Premises and in University Programs (the "Protection of Minors Policy") and these Procedures (both of which may be accessed via the University's Youth on Campus **website**).
- b. The director or supervisor of the Third-Party Program must certify in writing to the Sponsoring Unit that criminal background checks (comparable to that described in University Policy 12.10.020 – *Background Checks*) have been conducted on all Third-Party Program staff. The director or supervisor must also undertake to conduct criminal background checks on any future program staff before they are hired, but in any event before working with any Minors in the Third-Party Program.

D. Campus Visits (Admissions, Recruiting, Tours, and Registered Student Organizations)

1. Admissions and Recruiting Visits:

- a. University admissions and recruiting personnel (i.e. University staff and faculty) must comply with the Protection of Minors Policy (RISK 2.50.060 – Protection of Minors on University Premises), including the Background Check and Training Requirements identified therein.
- b. The coordinator of the University-organized Campus Visit will collect emergency contact and permission to treat information from the

parent/guardian of the Minor visitor if not accompanied by a parent/guardian.

- c. If the Campus Visit includes overnight accommodations for Minors in any University residential housing, the coordinator of the organized admissions or recruiting visit will communicate with Housing and Residential Education Office of the dates of the visit, guest and host names and locations of overnight stays.
- d. Current University students who host overnight prospective high school students in formal admissions/athletics office programs will complete Training, a behavior contract, and the guest will be registered with the [Office of Housing and Residential Education](#) in accordance with these procedures; the hosting student will not be required to complete a Background Check.

2. Registered Student Organizations

- a. Members of Registered Student Organizations (“RSOs”) who conduct or participate in activities and events with Minors will complete Training and depending on type of program (single day event vs. ongoing) and the presence of third party supervision, both Training and a Background Check.

Examples:

- Members of RSOs participating in a single daytime event (such as a University sorority hosting a Girl Scout troop(s) for an afternoon campus visit), would be required to complete Training.
 - Members of RSOs participating in an ongoing program, such as one-on-one tutoring of Minors would be required to complete Training and a Background Check.
- b. Student Organization rosters and events should be managed and updated through [Crimson Connect](#).
 - c. The Office of Student Engagement will monitor compliance of student groups to these Procedures and the Protection of Minors Policy.

E. Guidelines

Program staff are expected to follow the University’s Working with Minors Guidelines, available on the Youth on Campus website. The Guidelines communicate expectations applicable to all community members involved in programs sponsored by or affiliated with the University; they address how to

set appropriate boundaries between community members and Minors participating in these programs.

F. Reporting and Emergency Procedures

1. *Emergencies:* In case of an emergency, call [Campus Safety](#) or the Denver Police Department at 911.
2. *All Other Reports of Known or Suspected Child Abuse:*
 - a. Anyone participating in a University Program involving Minors or a Third-Party Program operating on University Premises involving Minors who knows, suspects, or receives information indicating that a Minor has been abused or neglected, or who has other concerns about the safety of Minors must report such concerns to one or more of the following, available 24 hours a day year- round:
 - Division of Campus Safety at 303-871-3000
 - DU Anonymous Hotline at 303-871-7439 (The University contracts with a confidential third-party provider, Lighthouse Services, for the intake of hotline reports.)
 - Colorado Child Abuse and Neglect Hotline: 844-CO-4-Kids (844-264-5437)
 - b. In addition, individuals should promptly notify their supervisor, director, dean, associate vice chancellor or vice chancellor.
3. *Addressing Reports of Child Abuse.* Whenever the University receives a report of alleged Child Abuse of a Minor, the Director of Campus Safety, or a designee, should promptly meet with the Office of General Counsel, the Office of Enterprise Risk Management, and Human Resources & Inclusive Community, and other University leadership, as appropriate, and must:
 - a. Take steps to prevent further harm to the Minor involved and other Minors.
 - b. Determine whether the University has reported the alleged abuse consistent with its obligations set forth in the Policy.
 - c. If a parent or legal guardian of the Minor involved has not been notified, and is not the alleged abuser, promptly notify the parent or legal guardian.
 - d. Facilitate the University's cooperation with any investigation conducted by local law enforcement, county child welfare, or any other

governmental agency.

4. *Mandatory Reporter*. [Colorado Revised Statutes §19-3-304\(2\)](#) requires “public and private school officials or employees” to report to county child welfare or local law enforcement: (a) circumstances when a person has reasonable cause to know or suspect child abuse has occurred; and (b) circumstances when a person has observed a child being subjected to conditions that would reasonably result in abuse. Direct questions concerning reporting obligations to the Division of Campus Safety at 303-871-3000. Individuals with a legal mandate to report child abuse to a local law enforcement or social service agency are identified in [C.R.S. §19-3-304\(2\)](#). These include coaches, athletic program personnel, school official or employee, psychologists, counselors, therapists, and many others.
5. *Questions* about reporting obligations or handling a situation involving a Minor on University Premises can be directed to Campus Safety or the Office of Enterprise Risk Management.

IV. PROCEDURES APPLYING TO PROGRAMS AND PARTICIPANTS

A. Program Registration.

The requirements in this section apply to all University Programs.

1. Prior to the commencement of any University Program, Sponsoring Units must register the University Program by submitting a youth program [registration form](#) through The University’s Youth on Campus website. Continuing programs must re-register annually to update information.
2. When registering, the director of the University Program will confirm that (i) they will comply with all requirements applicable to University Programs in these Procedures and (ii) all program staff have been screened and trained in accordance with Section B (Training) and Section C (Background Checks) above.
3. To request reasonable and necessary exceptions to registration requirements, or for questions regarding compliance, contact the Office of Enterprise Risk Management (see “Contacts” below for additional contact information).

B. Permissions and Authorizations.

For any Minor under the age of fourteen (14), the Sponsoring Unit running a University Program must obtain all required completed and signed permission form(s) from the Minor’s parent or legal guardian before the Minor can

participate in the University Program.

C. Emergency Contact

The Sponsoring Unit running a University Program for Minors under the age of fourteen (14) must also establish a procedure for notifying the Minor's parent or legal guardian in case of an emergency. Before the Minor participates in a University Program, individuals running the University Program must provide information to a parent or legal guardian explaining:

1. the procedure for contacting the Minor during the University Program;
2. how a parent or legal guardian may report concerns about any incidents that may have occurred during the Minor's participation in the Program; and
3. the rules and discipline measures applicable to the University Program.

Individuals running a University Program for Participants age fourteen (14) and over must obtain and provide the information described above; provided, however, that in the rare instance where it is not feasible or practicable to collect this information, the individual running the University Program first must obtain an exception to this requirement from the Office of Enterprise Risk Management

D. Overnight Programs.

Whenever a Participant is expected or scheduled to be involved in an overnight University Program, individuals running the Program must obtain from the Participant's parent or legal guardian:

- Required permissions identified in subparagraph B above; and
- A signed form that allows University-Related Individuals to authorize emergency medical treatment.

Sponsoring Units for any University Program where Minors do not stay overnight as part of the University Program must obtain the above information when reasonably appropriate, feasible, and practical unless such Sponsoring Unit has obtained an exception to this requirement from the Office of Enterprise Risk Management.

E. Supervision.

Individuals running a University Program must provide for adequate supervision of Minors while they are participating in the University Program. This includes having Authorized Individuals visually supervise all Participants at all times. The following are recommendations for the ratio of Authorized Individual-to-Participants, but Sponsoring Units should set Authorized Individual-to-

Participant ratios based on the unique circumstances and activities of the applicable University Program using the factors identified below:

- Participants ages 4-5 – One Authorized Individual for every 6 Participants
- Participants ages 6-8 – One Authorized Individual for every 8 Participants
- Participants ages 9-14 – One Authorized Individual for every 10 Participants
- Participants ages 15-17 – One Authorized Individual for every 12 Participants

Individuals running a University Program have the discretion to set Authorized Individual-to-Participant ratios based on the following factors:

- Number and age of Participants;
- Activities involved in the University Program;
- Safe practices applicable to the type of University Program;
- Type of housing, if applicable; and
- Age and experience of the Authorized Individuals.

When supervising Participants overnight, and whenever possible, an Authorized Individual should not enter a Participant's room, bathroom facility, or similar area without a second Authorized Individual present or in the immediate vicinity.

For Third-Party Program activities on University premises, the University recognizes that Minors present are under the supervision of the unaffiliated organization or person. Members of the University Community contracting with unaffiliated organizations or persons in these instances should include appropriate language in contracts confirming supervisory responsibilities of the unaffiliated organization or person. When possible, all third-party organizations contracting to use University facilities to host an activity involving Minors must, and all contracts with contractors and independent contractors who will have interactions with Minors as part of a University Program must:

- Certify that the third-party organization has implemented procedures to address the safety and well-being of Minors participating in its activity or include a provision that requires compliance with all of the provisions of these Procedures;
- Provide evidence of general liability insurance coverage in an amount satisfactory to the University and must name the University as an additional insured on the insurance policy for the duration of activity;
- Agree to release and indemnify the University from all liability and claims for damages from any cause and defending and holding the University harmless against any and all claims arising from the actions of the third-party organization, its employees, and its volunteers.

V. COMPLIANCE, ENFORCEMENT AND QUESTIONS

- A. Members of the University Community who supervise University Programs must enforce and monitor compliance with these Procedures and maintain appropriate records demonstrating that compliance. These responsibilities include, but are not limited to, confirming that all:
- Forms and other communications satisfy the requirements of these Procedures;
 - Individuals complete background check requirements before working or interacting with Minors in University Programs; and
 - Individuals complete the training requirements before working or interacting with Minors in University Programs.
- B. Violations of University Policy 2.50.060 - *Protection of Minors on University Premises and in University Programs* or these Procedures can result in outcomes or corrective action, which may include additional training, restriction from certain activities, verbal or written warnings, suspension, dismissal, termination of employment, and, where appropriate, exclusion from University Programs or University Premises. The University may also take appropriate interim actions before determining whether an individual is responsible for a violation the Policy or these Procedures. The University may terminate agreements, discontinue relationships, or take other appropriate actions against non-University organizations and entities that are found responsible for a violation of the Policy or these Procedures.
- C. Contact the Office of Enterprise Risk Management with questions about the Protection of Minors Policy or these Procedures.

VI. DEFINITIONS

- A. **“Authorized Individuals”** mean members of the University Community who have successfully completed a criminal background and fingerprint check as discussed in these Procedures and who have successfully completed designated training as discussed in these Procedures.
- B. **“Background Check”** means a background check as described in University Policy RISK 12.10.020 – *Background Checks*
- C. **“Campus Visits”** means a Minor's temporary presence on University Premises as part of a University recruitment event or community outreach activity.
- D. **“Child Abuse”**: In accordance with the Colorado Children’s Code, C.R.S. § 19-1-101, et seq., Child Abuse means an act or omission that threatens the health

or welfare of a child, and “abuse” or “child abuse or neglect” includes cases in which a child shows evidence of physical injuries or malnutrition that is not justifiably explained; cases in which a child is subjected to sexual assault or molestation, sexual exploitation, or prostitution; cases in which a child is a child in need of services because the child's parents, legal guardians, or custodians fail to take the same actions to provide adequate food, clothing, shelter, medical care, or supervision that a prudent parent would take; and other specified acts and omissions.

- E. **“Minor”** means, for purposes of this Policy, a person under the age of 18 who is not emancipated.
- F. **“Participant”** means a Minor who is not enrolled in an undergraduate/graduate program of study at or employed by the University and who participates in a University Program offered by an academic, recreational, or administrative unit of the University.
- G. **“Sponsoring Unit”** means a division, department, or center of or at the University that sponsors University Program(s), such as Athletics, Recreation and Wellness, the Newman Center, Ricks Center for Gifted Children, Fisher Early Learning Center, and Admissions (High School Early Experience Program).
- H. **“Third-Party Program”** means events or activities that are designed to include Minors and that are conducted by non-University organizations and entities on University Premises, including, for example, workshops, sport camps, and conferences.
- I. **“University Programs”** means events or activities that are designed to include Minors that are sponsored by or affiliated with the University (whether for academic, educational, pre-collegiate, experiential, athletic, artistic, recreational, or other purposes) that are operated either: (I) on University Premises, or (II) off University Premises under the direction and authority of the University. University Programs includes, but is not limited to, University-sponsored on-campus or off-campus sport camps, workshops, academic programs, music programs, counseling of any kind, recruiting activities, conferences, and programs through the Fisher Early Learning Center and the Ricks Center for Gifted Children, any of which include one or more Participants.

For purposes of this Policy, University Programs do not include:

- (i) single events on University Premises (such as festivals, convocations, recognized student organization event, or athletic events) that are generally open to the public and to people of all age groups at which Minors may be present;
- (ii) Campus tours or Campus Visits attended by prospective students who

- may be Minors;
- (iii) University undergraduate or graduate programs to which students who are Minors are admitted and enrolled on a full-time basis;
- (iv) the employment of Minors by the University;
- (v) internships at the University, whether paid or unpaid; or
- (vi) research studies subject to the review and approval of an Institutional Review Board (IRB), as these studies are governed by separate standards and oversight.

- J. **“University Premises”** includes all land, buildings, facilities, or other property in the possession of or owned, used, operated, or controlled by the University, including adjacent streets and sidewalks.
- K. **“University Community”** means University trustees, officers, faculty, staff, students, and individuals providing services for the University as contractors or volunteers.

VII. RESOURCES

- A. Contact information for [Division of Campus Safety](#)
- B. [Reporting and Resources](#) available on the Office of Equal Opportunity & Title IX website.
- C. Colorado Department of Human Services [Mandatory Reporting Website](#)
- D. Colorado Department of Human Services Office of Children, Youth & Families [Child Abuse & Neglect Website](#)
- E. [CO4Kids.org](#) (for information regarding [signs of Child Abuse and Neglect](#))
- F. Other Prevention Resources:
 - [U.S. Department of Health and Human Services, Children’s Bureau, Factsheet: What is Child Abuse and Neglect? Recognizing the Signs and Symptoms](#)
 - [U.S. Department of Health and Human Services, Children’s Bureau, Factsheet: Preventing Child Abuse and Neglect](#)
- G. University Policy RISK 12.10.020 – *Background Checks*
- H. [Conference and Event Services](#)
- I. [Denver Sports & Outdoors – DU Youth Programs](#)