University of Colorado **Denver**

Policy Title: Child Protection Policy

Policy Number: 3001D Functional Area: General Administration

Effective: April 1, 2026

Approved by: Ken Christensen, Chancellor

Applies to: CU Denver

A. Introduction

The University of Colorado Denver offers 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

Children 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 students, faculty, staff, and volunteers, as well as unaffiliated individuals and organizations who operate programs using university facilities that involve interaction with children. This policy and related appendices adhere to University of Colorado Administrative Policy Statement 7009 concerning the protection of children participating in university-run and university-contracted programs. See Section D for the definition of Programs for Children.

The University of Colorado does not discriminate on the basis of race, color, national origin, sex, pregnancy, age, disability, creed, religion, sexual orientation, gender identity, gender expression, veteran status, marital status, political affiliation, or political philosophy in admissions and access to, and treatment and employment in, its educational programs and activities.

C. Procedures

1. Each Program for Children must designate a Program Administrator who is responsible for ensuring that the protocol and procedures of this policy are followed. The designated campus administrator for the CU Denver Campus is the Associate Vice Chancellor for Student Affairs.

2. Campus approval is required for all Programs for Children to occur, including programs that both manage their own university facility space, and programs that reserve space through the Event Management System (EMS).
   a. For programs intending to use university space, EMS will grant a tentative hold if the space is available. The hold will be removed once the campus administrator has approved the program to proceed.

3. Regardless of the frequency of the program, each program must reapply for program approval annually, or with each new program cycle as defined by the program.

4. When changes to personnel are made within existing programs, such programs must re-certify for approval.

5. The approval process is as follows:
   a. Each Program Administrator must register the program, annually if recurring, through a completed form. Upon registration, the designated campus administrator will be notified. Registration will require all relevant programmatic details, including:

      - Name of the program
      - Campus department sponsoring the program
      - Department, Center or section leader name and such person's approval that event may occur
      - If applicable, name of the unaffiliated program/group and program/group leader
      - Program description
      - Program's date(s), duration and location(s)
      - Approximate number and age range of children
      - Program Administrator's email address and phone number
      - Background check certification, required for all faculty, staff, students and volunteers who will be working with children (see Section C.5.b)
      - An attestation that all requirements of this policy have been met (see Section C.6)

   b. Each Program Administrator must assure that a criminal and National Sex Offender Registry background check on each university faculty, staff, student, and volunteer who will be working with children is completed. 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. Background checks must be re-submitted and renewed every three (3) years.

   c. Each Program Administrator, program personnel and volunteers interacting

with children must complete the Percipio SkillSoft Child Protection course CU: Child Protection – u00165 training prior to the commencement of the program. Training must be renewed annually.

d. Each Program Administrator and program personnel must positively attest on the Notice of Program with Participation of Children form that the Dos and Don'ts have been reviewed with all personnel who are working with children (see Appendix A).

e. Each Program Administrator must complete the Standard Operating Procedures (SOP) template and Emergency Protocol (EP). The completed SOP and EP will be returned to the campus administrator as part of the registration process.

f. All programs that bring children into research areas or other high hazard environments must follow required University Risk Management and Environmental Health and Safety Protocols for minors.

g. All children participating in programs exceeding 30 days must wear a Guest ID Card while on campus. The Program Administrator for a multiple-day program must submit an application to the campus administrator for temporary access badges issued by CU Denver Facilities Management to enter and use University facilities. All other programs should provide name tags with program contact information for participating children.

h. Program Operators are encouraged to obtain Campus Insurance through University Risk Management for each program. The campus may also require Program Operators to purchase Camp Insurance prior to approval of the program.

6. The Program Administrator must provide an attestation to the campus administrator that they have reviewed the Child Protection Policy and ensured that all individuals involved in the program have passed the background checks, and all training and other requirements of the policy have been completed.

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 the child is on the Auraria campus the appropriate law enforcement agency to contact is Auraria Police Department 303-556-5000. If the child is not on the Auraria campus, local law enforcement may be contacted by calling 911.

8. 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.

9. All Program Administrators who contract or utilize services with unaffiliated programs must notify such Unaffiliated Program Operators that they must comply with this Campus Child Protection Policy.

   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 urmucddirs@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*: Individual(s) under the age of 18 years, who are not current university students.
3. *Program for Children:* Any activity, camp, program, or event in which the care, custody, or supervision of one or more Child/Children is expected to be the responsibility of one or more Child/Children program staff, including university employees, students, volunteers, or third-party staff acting on behalf of or pursuant to a contract with CU Denver, requiring registration and campus approval.

4. *Program Administrator:* a designated faculty or staff member responsible for administrative oversight and compliance for a Program for Children. The Program Administrator ensures the program meets all requirements of the University's Child Protection Policy, including required training, background checks, and coordination with relevant campus offices.

5. *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.

6. *Unaffiliated Program Operator*: A third party who enters into an agreement with the campus to operate its own Program for Children using University facilities. At a minimum, unaffiliated program operators are required to follow this Policy and ensure that their staff, volunteers, and participants are familiar with this policy. If applicable, at a minimum, the unaffiliated program operator must agree to: 1) provide insurance and indemnification, as required by APS 7001: Insurance and Indemnification Requirements for Use of Facilities by Non-University Groups; 2) comply with this Policy and APS 7009: Protection of Children Participating in University-Run and University-Contracted Programs for Children; 3) collect and maintain all required information; and 4) submit to a compliance audit as required by the campus.

Notes

1. 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, 2019: South Denver Location contact updated.
   - March 1, 2026: Policy 3001 was decided to split from dual campus policy to individual policies for Denver (3001D) and Anschutz (3001A) with relevant updates made to 3001D.

2. 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
   - Campus Administrative Policy 6006: Minors in Laboratories and Animal Facilities
   - University Risk Management Volunteer, Trainee and Minor Participants
   - Appendix A, Protocol for Protection of Children Participating in Program for Children on Campus
   - Appendix B, Registration Form: 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 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, or assign any participant who is 18 or over to share accommodations with a 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.
- Leave any Child/minor unattended while participating in the Program.

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

Registration Form: Program with Participation of Children

See https://www.ucdenver.edu/events/plan-an-event/bringing-children-to-campus/process/program-registration-guide

Appendix C

These individuals are required by Colorado Law to Report Child Abuse or Neglect:

- 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 Psychotherapist

- Social Worker or worker in any licensed facility or agency

- Social worker, licensed clinical social worker, clinical social worker, addiction counselor, or certified addiction counselor, unlicensed psychotherapist
- 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 (2024)