



**Policy Title: Child Protection Policy**

Policy Number: 3001A      Functional Area: General Administration

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Effective: March 1, 2026

Approved by: Terri Carrothers  
Executive Vice Chancellor for Administration and Finance  
CU Anschutz Medical Campus

Applies to: CU Anschutz

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## **A. Introduction**

The University of Colorado Anschutz Medical Campus (“University” or “CU Anschutz”) offers many educational programs specifically for children. Operating programs for children creates obligations for the campus and a concurrent need to ensure that such programs comply with Board of Regents’ and University policies and state and federal law.

## **B. Policy Statement**

Children visiting University facilities and participating in University-sponsored programs and activities require particular vigilance to protect their safety and well-being. This policy sets forth the expectations for university students, faculty, staff, and volunteers, as well as nonaffiliated 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 Anschutz Medical Campus is Assistant Vice Chancellor of Initiatives and Community Engagement.
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.
5. The approval process is as follows:
  - a. Each Program Administrator must register the program, annually if recurring, through the OnBase. Upon registration, the designated campus administrator will be notified. Registration will require all the relevant programmatic details, including:
    - Name of 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 or group and program or 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 has been conducted for 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](mailto:HR.backgrounds@ucdenver.edu) Background check results must be submitted to the campus administrator prior to the commencement of the program. Background checks must be re-submitted and renewed every 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 automated 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](#).
  - g. All children participating in programs exceeding 30 days who are 15 or older must wear a security badge while on campus. Therefore, the Program Administrator from a multiple-day program must submit an application through OnBase for temporary access badges to enter and use University facilities. In certain employment circumstances, a badge may be required under the age of 15.
- 6. The program administrator must provide an attestation 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. (The attestation is submitted via OnBase.)
- 7. Once background checks, child protection training, Standard Operating Procedures and Emergency Protocols are submitted and reviewed for policy compliance, and when necessary University Risk Management and Environmental Health and Safety procedures have been followed and reviewed, approval will be granted by the campus administrator, and when necessary, a badge will be provided for each participant by the University Badging Office, or a Badging Office designee.
- 8. Colorado law (CO Statute Section 19-3-304 (2)) requires those individuals listed in Appendix B 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).
- 9. 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.

10. Any individual not listed in Appendix B 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.
11. All Program Administrators 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.
12. All Program Administrators 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](mailto: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:* Individuals under the age of 18 years, who are not current students of the University.
3. *Program for Children:* Any activity, camp, program, or event in which the care, custody, or supervision of one or more youth is expected to be the responsibility of one or more youth program staff, including university employees, students, volunteers, or third-party staff acting on behalf of or pursuant to a contract with CU Anschutz, requiring registration and campus approval.
4. *Program Administrator:* A program faculty or staff member who will be responsible for ensuring that the Program for Children complies with this policy, and, when appropriate, contracts with an unaffiliated Program Administrator to operate a Program for Children. Students

and student workers cannot be a Program Administrator.

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. History

- April 1, 2018: Adopted by the Chancellors; 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
- March 1, 2026: Dual campus policy was recast into separate policies for Denver (3001D) and Anschutz (3001A). CU Anschutz policy and procedures were updated to reflect current requirements.

### 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, Individuals required by [Colorado Law to Report Child Abuse or Neglect](#)

### 3. Responsible Offices:

- University Risk Management
- Environmental Health and Safety
- Office of Access and Engagement
- Office of the Executive Vice Chancellor for Administration and Finance

## Appendix A

### Protocol for the Protection of Children Participating in a 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.
- Leave Children unattended while participating in the Program.

## **Other Key Considerations**

### **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. Minors in Laboratories and Animal Facilities Policy)

### **Identify all training requirements for minors.**

- Safety training based on risk assessment.
- HIPAA, FERPA requirements.
- 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.**

- Create an understanding of emergency protocols (medical emergencies, missing minors).
- Establish contact information for the program supervisor, public safety, point person and information on how to initiate a complaint or concern.
- Provide a 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

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

Persons required to report such abuse or neglect or circumstances or conditions include any:

- (a) Physician or surgeon, including a physician in training;
- (b) Child health associate;
- (c) Medical examiner or coroner;
- (d) Dentist;
- (e) Osteopath;
- (f) Optometrist;
- (g) Chiropractor;
- (h) Podiatrist;
- (i) Registered nurse or licensed practical nurse;
- (j) Hospital personnel engaged in the admission, care, or treatment of patients;
- (k) Christian science practitioner;
- (l) Public or private school official or employee;
- (m) Social worker or worker in any facility or agency that is state licensed or certified;
- (n) Mental health professional;
- (o) Dental therapist or dental hygienist;
- (p) Psychologist;
- (q) Physical therapist;
- (r) Veterinarian;
- (s) Peace officer;
- (t) Pharmacist;
- (u) Commercial film and photographic print processor;
- (v) Firefighter;
- (w) Victim's advocate;
- (x) Licensed professional counselors;
- (y) Licensed marriage and family therapists;
- (z) Unlicensed psychotherapists;
- (aa) Clergy member.
- (bb) Registered dietitian;

- (cc) Worker in the state department of human services;
- (dd) Juvenile parole and probation officers;
- (ee) Child and family investigators;
  - (ff) Officers and agents of the state bureau of animal protection, and animal control officers;
- (gg) The state child protection ombudsman;
- (hh) Educator providing services through a federal special supplemental nutrition program for women, infants, and children;
  - (ii) Director, coach, assistant coach, or athletic program personnel employed by a private sports organization or program.
- (jj) Person who is registered as a psychologist candidate, marriage and family therapist candidate, or licensed professional counselor candidate;
- (kk) Emergency medical service providers;
  - (ll) Officials or employees of a county department of health or a county department of human or social services;
- (mm) Naturopathic doctor registered under article 250 of title 12; and
- (nn) Employees of the department of early childhood.

For the most up-to-date list, please visit [CO Rev Stat § 19-3-304 \(2024\)](#)