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| CU BOULDER PROCEDURE STATEMENT |
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Statement Title: Youth Protection

CU Boulder Functional Area: Compliance

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| Brief Description: | The purpose of this statement is to provide requirements for the safety and protection of Minors who are participating in university sponsored programs. |
| Effective: | October 1, 2024 |
| Approved by: | Chancellor J. Schwartz |
| Responsible University Officer: | Senior Vice Chancellor of Operations |
| Responsible Office: | Office of Compliance, Ethics and Policy |
| Policy Contact: | Youth Protection Compliance Manager |
| Supersedes: | Minors on Campus Policy |
| Last Reviewed/Updated: | October 1, 2024 |
| Applies to: | Staff, Faculty, Students, unaffiliated program staff and operators |

I. INTRODUCTION

- A. Required Procedures, Plans, and Protocols for Affiliated Youth Programs.

II. PROCEDURE

- A. Program Registration
 - a. All Affiliated Youth Programs must complete the registration process with the Office of Compliance, Ethics, and Policy 30 days prior to the start of the program. This includes uploading all related forms, plans, and procedures outlined in this document, for review by the Office of Compliance, Ethics, and Policy.
- B. Forms, Documents, and Plans
 - a. All Affiliated Youth Programs must collect the following forms and waivers from their participant. These forms must be signed by a legal caregiver or guardian. These forms must be updated annually and retained for 3 years. Retention and disposal of these records must be in accordance with University of Colorado APS 2006 Retention of University Records.

- i. Parent(s) / Guardian(s) consent to participate in the Youth Program.
 - ii. Statement of Health Status
 - 1. Known allergies and dietary needs.
 - 2. It is recommended that programs collect a complete health history for each participant, including any communicable diseases, chronic illnesses or injuries, known drug reactions, and current medications.
 - 3. It is also recommended that programs collect documentation of immunization status or exemption as required by Colorado Department of Public Health and Environment (CDPHE).
 - iii. Emergency Contact Form
 - iv. General Liability Waiver
 - v. Activity Specific Waivers
 - vi. Code of Conduct
 - 1. All Youth Programs with participants who are 10 years or older must utilize the Code of Conduct for Youth Programs, or a code of conduct that meets or exceeds the requirements of the code of conduct for Youth Programs, and has been reviewed by the Office of Integrity, Safety, and Compliance.
 - vii. Request for Accommodation
- b. Caregiver / Guardian Handbook
 - i. All youth programs must provide parent(s) / Guardian(s) with a guide that contains the activities policies and procedures. Programs must obtain a signed document stating that parent(s) / guardian(s) have received the policies and procedures. That document is required to contain the following information;
 - 1. The program's description, purpose, and mission.
 - 2. The ages of children accepted;
 - 3. Request for accommodation statement.
 - 4. The hours and dates when the Youth Program is in operation, specific hours during which special activities are offered, and closures.
 - 5. The policy regarding weather;
 - 6. The procedure concerning the admission and enrollment of participants;
 - 7. An itemized fee schedule;
 - 8. The procedure to ensure the location of participants is known at all times, how participants are accounted for throughout the day, and that participants are supervised at all times by their assigned Youth Program staff member or volunteer;
 - 9. The procedure for handling participant's illness, accidents, and injuries, including when participants will be excluded from the Youth Program and notification of parents/guardians;
 - 10. The procedures followed when it has been identified a participant is separated from their group and not under the direct supervision of their assigned Youth Program staff member or volunteer.

11. The procedure for transporting participants, if applicable, including transportation arrangements and parental permission for excursions and related activities.
12. The procedure governing field trips, television, and video viewing, and special activities, including Youth Program staff and volunteer's role for supervision of participants;
13. The procedure on participants' safety related to riding in a vehicle, seating, supervision, and emergency procedures on the road.
14. The procedure for releasing participants from the Youth Program only to persons for whom the Youth Program administrator has written authorization.
15. The procedure followed when a participant is picked up from the Youth Program after it has concluded or not picked up at all, and the procedure to ensure that all participants are picked up before the Youth Program staff leave for the day.
16. The procedure for caring for participants who arrive late to the Youth Program and their class/group has already departed on a field trip or excursion.
17. The procedure concerning participants' personal belongings and money.
18. The policy concerning meals and snacks.
19. The policy and procedure regarding visitors.
20. The procedure for filing a complaint about the Youth Program.
21. The procedure regarding the reporting of suspected or known child abuse and/or neglect.
22. The procedure, if applicable, for transitioning participants between school or community sponsored activities and the Youth Program.
23. The steps the Youth Program will take prior to the suspension, expulsion, or request to parents/guardians to withdraw a participant from the Youth Program due to concerns about the participant's behavioral issues. These procedures must be consistent with the Youth Program's policy on guidance, positive instruction, discipline, and consequences, and include documentation of the steps taken to understand and respond to challenging behavior.
24. The procedure for notification when a participant is withdrawn by the Youth Program, or when parents or guardians withdraw their participants from the Youth Program.
25. The CU Alerts Information:
 - a. Individuals who would like to be added to the CU Alerts Channel for Youth Programs can Text "cucamp" to 67283. Individuals will be added to the channel and removed from the channel automatically after 90 days. They will be prompted to resubscribe if they would like to. Subscribers can unsubscribe at any time by replying stop.

- c. Emergency Management and Preparedness
 - i. All Youth Programs must create an emergency communications plan. This must include procedures for distributing information to staff, volunteers, and parent(s) / guardian(s).
 - ii. All Youth Programs must create evacuation, shelter in place, lockdown, and active harmer plans.
 - iii. All Youth Programs must have severe weather plans. These plans must include but not limited to;
 - 1. Lightning
 - 2. Tornados
 - 3. Fires
 - 4. Flooding
 - iv. All Youth Programs must create a reunification plan, that outlines the care of participants during and after an emergency, and how participants will be reunited with parent(s) / guardian(s).
 - v. All Youth Programs must create a continuity of operations plan. This plan must include an outline of responsibility for essential staffing needs and predetermined roles during and after an emergency or disaster.

C. General Operational Guidelines and Protocols

- a. All Youth Programs must have a Daily Sign-in/Sign-out procedure.
- b. All Youth Programs must have a procedure to ensure the location of participating youth is always known.
- c. Risk Management Consultation
 - i. All Youth Programs must consult with Risk Management to ensure that they have proper waivers completed and have proper insurance coverage.
- d. Supervision Ratios
 - i. A Youth Program's supervision needs may vary depending on the nature of the activity. Youth Programs should, to the greatest extent possible, plan for the presence of at least two Youth Program Staff when supervising or in direct contact with Minors. At minimum, the following Youth Program Staff-to-Minor supervision ratios, as recommended by the American Camp Association, must be met for all in-person activities:

| Program participant age group | Number residential (overnight) participants | Number of non-residential (day only) participants | Number of Youth Program Staff |
|-------------------------------|---|---|-------------------------------|
| 5 years* | 5 | 6 | 1 |
| 6 – 8 years | 6 | 8 | 1 |
| 9 – 14 years | 8 | 10 | 1 |
| 15 – 18 years | 10 | 12 | 1 |

e. Transportation

- i. Youth Program Staff are not permitted to transport Minors alone in any vehicle, except in an emergency (i.e., life-threatening situation or imminent danger).
- ii. All Youth Programs that are transporting participants must develop a transportation plan. That plan must include the following;
 1. Check-in/check-out Protocols
 2. Description of the transportation.
 3. Detailed itinerary.
 4. Plan for supervision during transportation.
 5. Communication plan.
 6. Emergency plan, including but not limited too medical emergencies, staff emergencies, severe weather, and reunification.
- iii. All Youth Programs that are engaging in field trips or excursions must have the following;
 1. Liability consultation with Risk Management.
 2. A First Aid kit must be with the group at all times.
 3. A procedure for caring for participants who arrive late to the Youth Program and their class/group has already departed on a field trip or excursion.
 4. A transportation plan.

f. Data Privacy and Recordkeeping

- i. Unless otherwise mandated by state or federal laws, the following records must be retained by the Youth Program administrators in accordance with University of Colorado APS 2006 Retention of University Records.
 1. Accident, incident, and injury records.
 2. Liability Waivers, including but not limited to participation agreements, parent consent forms, photo/media releases or consent for medical treatment.
 3. Youth program participant records, including but not limited to rosters, attendance tracking and household/demographic data.
 4. Employment records, including but not limited to time keeping and dates of Criminal Records Check and Sex Offender Registry Check.
 5. Volunteer records, including the conditions of Volunteer service form and related documents, such as the description of Volunteer duties and dates of Criminal Records Check and Sex Offender Registry Check.
 6. Training records that specify dates, content covered, and participant names for all personnel participating in required training.
- ii. Depending on the nature of the Youth Program, Personal Data of Minors may be collected, stored, and used for the purpose of providing, operating, improving and promoting a Youth Program. However, it must be done in a transparent and responsible manner, ensuring it remains secure and confidential, and shared only with those who need access to carry out activities and to provide for the safety and well-being of Minor participants.

iii. Youth Program administrators must adhere to the following requirements regarding the personal data of minors:

1. Collection and Disclosure

- a. Youth Program administrators must provide parents/ guardians a privacy statement, with language approved by the Office of integrity, safety, and compliance, describing their practices for collecting personal data, including why it is being collected; how it will be used, shared, stored and retained; and who to contact with questions.
- b. Youth Program Administrators must obtain parent/legal guardian consent (and should collect Minor Participant consent as well) before collecting Personal Data directly from Minors, and before taking and using any photographs, videos, audio recordings, etc. of Minors. Youth Program administrators must obtain written consent using an appropriate form approved by the Office of Youth Protection and Programming.
 - i. If content that identifies or can identify a Minor (e.g., essay, artwork, etc.) will be created during the Youth Program, parent/legal guardian written consent must also be obtained if it will be shared publicly.

2. Storage and Use

- a. All Personal Data of Minors must be securely stored and in compliance with CU Boulder Information Security Policies.
- b. Personal Data may only be shared with those who have a specific need to have it in order to carry out Youth Programs, and to provide for the safety and well-being of the Minor.
- c. Authorized images, videos, or created content that may identify a Minor may not be shared publicly until the Youth Program has concluded, and may only be used on official University or Youth Program platforms after obtaining the required written parent/legal guardian consent; Youth Program Staff are not permitted to post images, videos or content of Minors on personal platforms.

3. Retention and Disposal

- a. Retain Personal Data collected in accordance with University retention policies and/or other legal requirements.
- b. When no longer needed or required to be retained, delete the information using reasonable measures to protect against its unauthorized access or use.
- c. Dispose of Personal Data in paper format in a way to prevent inappropriate access to the data (e.g., shredding).

g. One-on-one Interactions

- i. One-on-one interactions between a minor and youth program staff (who is not the Minor's parent or guardian) must occur within an observable or interruptible

distance from another adult and should only take place in open, well-illuminated areas.

h. Electronic Communications

- i. Youth Program Staff may not have personal, non-programmatic electronic communication with Minor participants during the Youth Program. Except in an emergency, all electronic communication must be open and transparent, meaning there must be at least three individuals included on any given communication, including another Youth Program Staff member, multiple Youth Program participants, and/or the Minor's parent/legal guardian.

i. Overnights and Lodging

- i. For Youth Programs that involve an overnight or lodging component, the following requirements apply:
 1. Separate accommodations for adults and Minors are required; Youth Program Staff may not share a room with a Minor with the exception of a parent/legal guardian who may room with their own child(ren), but no others.
 2. At least two Youth Program Staff must always be present when conducting room checks.
 3. If Minors will be residing together, Youth Program Administrators must make efforts to ensure that youth of the same or similar ages are grouped together.

j. Restrooms, Changing Areas, and Locker Rooms

- i. For Youth Programs that will require use of bathroom, changing area or locker room facilities, the following requirements apply:
 1. Youth Program Staff must never be alone with a Minor in these areas.
 2. Should an activity require changing or showering, Minors must always have access to a private or semi-private changing area or shower stall.
 3. Youth Program Staff must never change clothes in front of a Minor, nor shower in front of a Minor, unless it is part of a pre- or post-activity rinse and appropriate swimwear is worn.
 4. Youth Program Staff shall make every effort to minimize changing area or locker room use when other non-Youth Program Staff adults are present and avoid allowing different aged youth to change and/or shower at the same time.
 5. No cameras or recording devices of any kind may be used in these areas when Minors are present.
 6. Monitoring of locker rooms and changing areas must be done regularly and randomly, monitoring can be done in the following ways;
 - a. Conducting a sweep of the locker room or changing area before participants enter to use the space;
 - b. Posting staff directly outside the locker room or changing area during periods of use;
 - c. Leaving the doors open when adequate privacy is still possible and/or;

- d. Making occasional sweeps of the locker rooms or changing areas.

k. Medical Administration

i. CPR and First Aid

1. All staff members of a Youth Program who are eighteen (18) years of age and older should have current Department-approved First Aid and CPR certificates. Uncertified staff members must work with another certified staff member. For every thirty (30) or fewer children in attendance, there must be at least one (1) staff member who holds a current Department-approved First Aid and CPR certificate for all ages of participants. Such individuals should be with the participants at all times when the program is in operation. If participants are at different locations, there should be a First Aid and CPR qualified staff member at each location.
2. In case of an emergency Youth Program Staff must contact emergency, medical services and follow their directives. Youth program staff should engage in emergency first aid and CPR.
3. If there is a participant attending a youth program who carries an anaphylaxis and epinephrine auto-injector, there must be a trained program staff member in the immediate vicinity (an area in which an individual is physically present and can see, hear, and direct, the activities of the participant) of the youth participants at all times.

ii. Medicine

1. Program staff cannot engage in the administration of medication including over the counter medications. All participants who need medication administered during the program excluding EPIPENS, must self-administer or work with the ADA office to identify the right accommodation and plan.
2. Program staff may engage in basic first aid and CPR.
3. If there is an emergency, programs must immediately call 911, follow their directives, and make a follow-up report to the Office of Compliance, Ethics, and Policy.
4. Programs may contract with a licensed medical professional who within their scope of practice may administer medication to the participants of the program.

l. Training

- i. Along with all other mandatory trainings as required by University Policy, Youth Program staff and volunteers must engage in the following trainings;
- ii. To assist Youth Program Staff and Employees carry out their reporting responsibilities and understand their role in protecting Minors, all Youth Program Staff and Employees are required to complete youth protection training aimed at the prevention of Child Abuse and Neglect, the recognition of the signs

and symptoms of Child Abuse and Neglect, and applicable reporting requirements and procedures.

1. Specific training requirements are as follows:
 - a. All Youth Program Staff will receive training related to their obligations under the Youth Protection Policy.
 - b. All Youth Program Staff and all Employees who qualify as Mandated Reporters per the State of Colorado must complete youth protection training before having direct contact with Minors and on an annual basis thereafter.
 - c. All Youth Program Staff who are identified as CSA, must take the CSA training.
 - d. Youth Program Staff may not begin work in any Youth Program until documentation of completion has been received, reviewed by the Office of Compliance, Ethics, and Policy.
- iii. Youth protection training programs are available through the Office of Compliance, Ethics, and Policy. Training approved and assigned by the Office of Compliance, Ethics, and Policy, must be completed, regardless of whether the Youth Program Staff or volunteer has received youth protection training elsewhere, unless the training received previously is approved in writing by the Office of Compliance, Ethics, and Policy.
- iv. All Youth Programs should also train their staff in accordance with the First-Aid and CPR requirements listed above.

D. Periodic Reporting to OCEP

- a. All Youth Programs are required to submit an End of program report to the Office of Compliance, Ethics, and Policy. This report must be submitted within 60 days of the conclusion of the program. The report must include the following;
 - i. Program Name
 - ii. Final Count of ParticipantsY
 - iii. Reporting of any serious incidents, both medical and behavioral.
 1. This reporting must be completed along with any other reporting requirements.