I. PURPOSE AND SCOPE OF POLICY

It is the policy of the University of Michigan to promote the health, wellness, safety, and security of children who are entrusted to the university’s care and custody and/or participate in programs/events/studies. This policy applies to all children-related U-M programs/events/studies, whether they are actually held on campus, virtually, or at an off-site location, and programs/events/studies held by others in university facilities.

The university has specific policies addressing children as employees, patients, research subjects, research laboratory visitors, and volunteers. The Children on Campus policy supports and complements these existing policies and guidelines. It also describes the resources that are available to all departments and units to help protect children engaged in University of Michigan programs/event/studies. Most of these resources can be accessed on the Children on Campus website (http://childrenoncampus.umich.edu/).

Review examples of inappropriate conduct with children.

Review exceptions to this policy (http://childrenoncampus.umich.edu/about/policy/).

II. PROGRAM REGISTRATION

A. REGISTRATION

All University of Michigan units and departments are responsible for registering authorized programs/events (http://childrenoncampus.umich.edu/program-event-registration/) covered under this policy. All programs/events should be registered with sufficient time to meet the requirements of this policy, but no later than 60 days before the program/event start date. Programs/events must be registered annually.

B. PLANNING

For a list of topics that program/event administrators are required to consider in the planning and evaluation of registered programs/events refer to the Program Planning Checklist (http://childrenoncampus.umich.edu/wp-content/uploads/2018/04/Planning-Checklist-042618.pdf).
C. CRIMINAL BACKGROUND SCREENING

Screening through the National Sex Offender Registry and national criminal background screenings must be completed and evaluated before any program/event faculty, staff or authorized adult may begin working with children. The criminal background and National Sex Offender screening will be conducted by University Human Resources for all U-M programs/events. If a criminal record is discovered, the application must be referred to Risk Management Services for evaluation.

All authorized adults or program/event faculty and staff who have supervisory responsibilities or have direct interactions with children in programs/events covered by this policy are required to submit to a screening. After that, screenings are required every two years.

D. PARTICIPANT REQUIREMENTS

Parents and legal guardians of children must submit required forms consistent with the planned activities of the program before being allowed to participate. For a list of required forms refer to Program/Event required forms (http://childrennoncampus.umich.edu/resources/forms/).

Completed forms may contain sensitive personal information and must be transmitted and kept secure in a manner consistent with guidelines provided by the Information Assurance Safely Use of Sensitive Data guidance.
(https://www.safecomputing.umich.edu/protect-the-u/safely-use-sensitive-data?nav)

E. TRAINING

All authorized adults or program/event faculty and staff working with children are required to be trained on policies and issues related to children’s health, safety, and security. Required training must be completed annually and may differ based on the role of the authorized adult. For a list of training courses and requirements refer to Required Training (http://childrennoncampus.umich.edu/training/).

Documentation of training completion must be maintained by the program/event administrator for three years.

III. USE OF UNIVERSITY FACILITIES

Program administrators of non-University-Sponsored programs/events using university facilities are required to certify that they are fully compliant with all requirements set forth within this policy, including completion of national criminal background and National Sex Offender Registry screening, for all authorized adults before being allowed to use university facilities.

University facility managers leasing or allowing the use of university facilities for non-University-Sponsored programs/events primarily serving children are required to obtain written confirmation that programs are fully compliant with all requirements set forth within this policy before being allowed to use or lease university facilities.

Facility managers are responsible for registering programs consistent with this policy.
IV. REPORTING OBLIGATIONS

A. GENERAL

All members of the university community must act immediately when criminal activity involving children is taking place, is alleged or suspected.

For emergency assistance or to report a crime in progress, dial 9-1-1- to connect with university or local police.

For a non-emergency situation, notify the Division of Public Safety and Security or call the local police department. Follow instructions provided by police with respect to all communication, questioning and notification of parents, program administrators or others.

Suspicions about possible wrongdoing can be reported anonymously through the university's compliance website (https://compliance.umich.edu/)or by calling the Compliance Hotline at 866-990-0111. The Hotline is available 24 hours a day and is staffed by multilingual interview specialists.

B. REPORTS OF KNOWN OR SUSPECTED ABUSE OR NEGLECT OF CHILDREN

Anyone participating in a University-Sponsored program/event or a non-University-Sponsored program/event operating in university facilities who knows, suspects or receives information indicating that a child has been abused, neglected, or who has other concerns about the safety of children MUST immediately inform the Division of Public Safety and Security or the local police department. In addition, the program/event administrator should be notified when it is safe and appropriate to do so.

Anyone who knows or suspects abuse or neglect of children should also notify the Michigan Department of Health & Human Services by calling 855-444-3911. This toll-free phone number is available 24 hours a day.

C. MANDATED REPORTERS AND THEIR LEGAL OBLIGATIONS

Michigan’s Child Protection Law, MCL § 722.621, et seq., designates individuals in certain occupations and professions as mandated reporters. Mandated reporters must immediately report known or suspected mental or physical abuse or neglect of a child made known to them in their professional or official capacity directly to the Department of Health and Human Services by calling 855-444-3911 (24/7 toll-free number). A written report must be submitted to the Department of Health and Human Services within 72 hours of the initial verbal report. Even those who are not mandated reporters may report known or reasonably suspected child abuse to the Department of Health and Human Services.


University faculty, staff, or students who are working with children in their professional
or official capacity and who have questions about whether they may be considered mandated reporters under Michigan law should contact their supervisor, program administrator, dean or vice president. The Office of the Vice President and General Counsel is also available to provide advice.

Notes
These policies require a level two two password for access.

1. UMHHC Policy 02-05-013: Suspected Child Abuse and Neglect
2. UMHHC Policy 03-07-018: Minors: Consent to Confidential Health Services
3. UMHHC Policy 03-07-019: Access to and Disclosure of a Minor Patient’s Protected Health Information (PHI)

Related Policies:
Discrimination and Harassment (/policy/201.89-1)
Employment of Minors (/policy/201.20)
Policy for Research with Human Participants (/policy/303.05)
Violence in the University Community (/policy/601.18)

Related Links:
Children on Campus website (http://childrenoncampus.umich.edu/)
Michigan Department of Health and Human Services Children’s Protective Services (https://www.michigan.gov/mdhhs/0,5885,7-339-73971_7119_50648---,00.html)
Information Assurance Safely Use Sensitive Data (https://www.safecomputing.umich.edu/protect-the-u/safely-use-sensitive-data?nav=)
EHS Requirements for Minors in Research Operations (http://ehs.umich.edu/wp-content/uploads/2016/02/Minors_in_Research_Facilities.pdf)
Regental Bylaw 14.06 (http://www.regents.umich.edu/bylaws/bylaws14.html#6)
Michigan Medicine Policy 03-07-018, Children: Consent to Confidential Health Se... (http://www.med.umich.edu)
Hard copies of this document are considered uncontrolled. If you have a printed version, please refer to the University SPG website (spg.umich.edu) for the official, most recent version.

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