

Creighton University

Children or vulnerable adults Policy

Frequently Asked Questions

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Frequently Asked Questions Children and Vulnerable Adult Policy

Creighton University adopted a Children and Vulnerable Adult Policy to be effective May 14, 2013. If you have questions regarding the policy or procedures, please contact the University's Office of Equity and Inclusion or Human Resources.

Why has Creighton University adopted this policy?

The University has adopted the Children and Vulnerable adults Policy for those in the University community and those who are Non-University entities using Creighton facilities who participate in programs or activities that involve children or vulnerable adults. The primary goal of the policy is to promote the well-being and safety of children or vulnerable adults who participate in programs run by or associated with Creighton University. The policy also clarifies responsibilities and provides guidance and support to help those who work with children or vulnerable adults.

Who are defined as children or vulnerable adults?

Children are minors under the age of 19 and vulnerable adults are adults with a substantial functional or mental impairment.

What is required for a department or program to offer an activity or event intended for children or vulnerable adults?

This policy requires the program or activity to be formally registered with the University and that each employee, volunteer or representative successfully pass a criminal background check and required training. This must all be completed prior to the start of the program or activity for the individual to be authorized.

Register Program or Activity

How does a department or program register with the University?

The Department or program will need to register the program at least sixty (60 days) prior to the beginning of the program or activity. This is accomplished by submitting the [Working with Children or Vulnerable Adults Notification Form](#) to the Office of Equity and Inclusion. Because this is a new policy if a department or program has an activity/event planned in less than 60 days, the notification form should be submitted as soon as possible.

Criminal Background Checks

Why is the University requiring criminal background checks prior to participating in programs or activities involving children or vulnerable adults?

The University is committed to promoting the well-being and safety of children or vulnerable adults who participate in University programs or activities and in programs that outside organizations deliver on campus. Criminal background checks may reveal prior convictions and/or pending charges that would make it inappropriate for someone to be involved in a program or activity with children and vulnerable adults.

Who is required to have a criminal background check?

Each individual in their role as employee, volunteer, or program representative must successfully complete a criminal background check prior to his or her direct participation with children or vulnerable adults in an activity covered by this policy no more than six months prior to the date of activity and at least once every four (4) years thereafter.

What does a criminal background check include?

Background checks will be limited to criminal offenses, including, but not limited to the list below for which an individual has been convicted or where such charges are currently pending.

County Criminal Record Search	Federal Criminal Record Search
Social Security Number Trace Search	Alias Name Search
Sex Offender Registry	Found Protection Orders
Found Wants and Warrants	Residential History Search
Nebraska Adult and Child Abuse Registry	

What happens if a criminal background check reveals adverse information or unfavorable results?

The University will conduct an individualized assessment using criteria designed to identify potential risk to children or vulnerable adults. A prior conviction and/or pending charges shall not automatically disqualify a person from participating in a program or activity. The results of background checks conducted under this policy will be used only for the purposes of this policy, except that Creighton University reserves the right to take appropriate action with respect to employees who may have falsified or failed to disclose convictions that could disqualify them from employment that were revealed as a result of the background check, including and up to immediate termination.

What happens when an individual assessment is conducted on an adverse or unfavorable result?

A conviction and/or pending charge, *by itself*, does *not* disqualify an individual from participating. However, consideration should be given to:

- Crimes against people
- the number of convictions;
- the nature, seriousness and date(s) of occurrence of the violation(s);
- rehabilitation;
- relevance of crime committed in relation to position;
- state or federal requirements related to the position; and
- other evidence demonstrating an ability to perform the job competently and free from posing a threat to the health and safety of others.

A decision not to permit an individual to participate in a program or activity covered by this policy based on the results of a background check will be made by Human Resources after consultation with the Office of Equity and Inclusion, the Office of the General Counsel, and others as needed.

What happens if someone refuses to complete a background check and/or training?

If the individual refuses to complete a background check and/or training, they will be denied the opportunity to participate in the program or activity involving children or vulnerable adults.

I am operating a program involving children or vulnerable adults. How do I get started and arrange for background checks and training for the program or activities employees, volunteers and representatives?

Step 1: Register and receive approval of the program or activity by completing the [Children and Vulnerable Adults Notification Form for Creighton University-sponsored Programs](#) (This form must be submitted **at least 60 days** prior to the first date of the program/activity)

Step 2: Secure a completed [Criminal Background Check Acknowledgement and Authorization Form](#) from each employee, volunteer, and program representative.

Step 3: Complete the [Request to Authorize Adults Form for Creighton University-sponsored Programs](#) and submit with the individuals' completed [Criminal Background Check Acknowledgement and Authorization](#) forms to Human Resources at humanresources@creighton.edu **no less than 2 weeks** prior to the first date of the program/activities in order for Human Resources to facilitate the appropriate background checks (Note: Background checks will be completed **no more than 60 days** prior to the first date of the program/activity).

Step 4: Contact the [Violence Intervention and Prevention Center](#) to schedule the *Working with Children and Vulnerable Adults Training*. This training must be conducted annually for program or activities' employees, volunteers and representatives.

Step 5: Notification from the Office of Equity and Inclusion indicating the names individuals that have been certified as authorized adults, those, who have complied with the requirements to be present with children or vulnerable adults under this policy, will be communicated to the program coordinator.

Step 6: Each authorized adult must complete the [Children and Vulnerable Adults Self-Disclosure of Criminal Convictions Form](#) on the first day of the program or activity. The program coordinator must submit the completed forms to the Office of Equity and Inclusion or the program's campus contact within the first 24 hours of the program or activity.

Training Requirements

What training am I required to have in order to participate in a program involving children or vulnerable adults?

All individuals working with children or vulnerable adults in University programs or activities are required to complete *Working with Children and Vulnerable Adults Training* and certify that they have done so. This provides helpful tips for maintaining a safe and positive environment when working with children or vulnerable adults, advice on signs of child abuse and neglect, and steps to take if you suspect that a minor or vulnerable adult has been abused or neglected.

The training is coordinated through the [Violence Intervention and Prevention Center](#). Once your program is registered and approved, you will receive the instructions.

I'm a student participating in a program involving children or vulnerable adults. Do I need any training?

Yes. All faculty, staff and students who are involved in a University sponsored or Non-University program or activity on campus involving children or vulnerable adults must certify that they have completed the training.

Reporting Abuse or Neglect

What should an individual do if s/he suspects that a child or vulnerable adult has been the victim of abuse?

Any member of the faculty or staff who suspects that a child or vulnerable adult who is on University premises for any reason, or is participating in a University-sponsored activity at another location, has

been the victim of abuse should immediately report the suspected abuse in accordance with Nebraska state law.

How do I make an abuse or neglect report to the University?

Immediately report any abuse and neglect to the person in charge of the program or activity and to the Department of Public Safety, and shall contact law enforcement and emergency responders as may be appropriate under the circumstances.

What if I'm not sure whether a child or vulnerable adult I'm working with has been abused or neglected?

If you encounter a situation in which you are uncertain or feel uncomfortable, contact your supervisor or program director in determining what to do. If you have any suspicion that a child or vulnerable adult has been abused or neglected, report it---even when you have doubts, it is better to report your suspicions than to ignore them.

External Programs Operating on University Campus

I would like to host a non-university program or activity involving children or vulnerable adults on Creighton's campus. What do I need to do in order to do so?

Non-University organizations that wish to operate programs or activities involving children or vulnerable adults on campus must comply with the University's [Children and Vulnerable Adults Policy](#), including completing all relevant training and criminal background checks.

Prior to the start of any program or activity involving children, Non-University organizations must 1) certify that they have conducted criminal background checks of their employees, volunteers, and representatives in accordance with Creighton's standards; and 2) certify to the University that all individuals who will be interacting with children or vulnerable adults have training that meets the University's standards. More information is available [here](#).

What should I do if I have additional questions?

A PDF version of the complete Children or vulnerable adults Policy is located [here](#). Otherwise, contact Tanya Winegard, Ph.D. in the Office of Equity and Inclusion at winegard@creighton.edu.