

Creighton University Children and 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 thirty (30 days) prior to the beginning of the program or activity. This is accomplished by submitting the [Children and Vulnerable Adults Notification Form](#) to the Office of Equity and Inclusion.

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 at least once every four (4) years.

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 30 days** prior to the first date of the program/activity.) Be sure to list all employees, students, volunteers, or program representatives involved on page 2 of the form OR attach an excel spreadsheet with this information.

Step 2: You will receive approval from the Office of Equity and Inclusion via email along with a list of individuals who need to complete a [Criminal Background Check](#) and/or a [Self-Disclosure of Criminal Convictions Form](#) as well as a list of individuals who need to complete the required University training.

Step 3: Collect all completed forms and submit them to the Office of Equity and Inclusion, located in Creighton Hall, suite 340, **no less than 2 weeks** prior to the first date of the program.

Step 4: Follow up with all participants to ensure compliance with the online University training. This training is an annual requirement and training compliance expires one year from the initial date of training.

Note: Programs where participants are working with the Omaha Archdiocese and schools within the Archdiocese will need to ensure completion of Safe Environment training. The University online training does not meet this requirement. Please contact the Office of Equity and Inclusion to learn about upcoming Safe Environment training opportunities on campus.

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

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 an annual online training. 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 Office of Equity and Inclusion. 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 Allison Taylor, M.S. Ed. in the Office of Equity and Inclusion at allisontaylor@creighton.edu

Please review How to Register My Program to learn more about training and background check requirements for all programs involving children and vulnerable adults. Be sure to start the registration process **no less than 30 days** prior to the start of your program.