



Policy 8.8 Children and Youth Safety

Responsible Executive: University Chief Compliance Officer

Responsible Office(s): Compliance and Risk Services

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1. Policy Statement and Requirements

1.1 Policy Statement

Cornell University is a private institution with a public land-grant mission, home to a myriad of academic, enrichment, and recreational activities and programs routinely bringing thousands of individuals to university-owned or -controlled property.

Cornell is committed to providing a safe environment for children and youth (minors) who participate in programs covered by this policy (Covered Programs). These programs are operated both by university departments and operations, as well as third-party camp and activity operators licensing the use of university property, and involve the participation of children and youth drawn from locations throughout the United States and the world.

While Cornell cannot predict the behavior of individuals intent upon untoward or criminal behavior, this policy sets forth measures that can enhance and contribute to the protection of children and youth participating in Covered Programs. Strict adherence to these policy requirements is necessary to involve children and youth in any Covered Program. Cornell expressly

prohibits the operation of any Covered Program involving children and youth that does not adhere to these policy requirements and New York State requirements.

1.2 Scope

This policy applies only to Covered Programs (see the [Definitions section](#)) and sets forth requirements and expectations for those Covered Programs and individuals who:

- Run or operate Covered Programs (internal and external) involving the participation of children and youth (minors);
- Have a duty to include certain requirements or clauses in facility use agreements where external entities are using university property for their Covered Program;
- Have a duty to report suspected abuse or mistreatment of minors as required by this policy.

For the purposes of this policy, a Covered Program does *not* include:

- Events or visits to campus that are open to the public or the Cornell community such as libraries, fairs, performances, festivals, entertainment, recreation, or any events in which parents or guardians retain responsibility for their minor children, including the decision to permit their minor children's attendance at a subject event unaccompanied by an adult;
- The placement of students with external entities (for example, externships);
- Visits associated with the university undergraduate admissions application process, student-athlete recruiting visits, and related information sessions led by or involving undergraduate student ambassadors or student-athlete hosts;
- Unsanctioned events taking place at university faculty or staff residential properties located off campus;
- Single guest lectures or one-time participation in academic or research activities by academic guests;
- The employment of individuals under 18 years of age by the university or an external entity;
- Any commercial business activity for an external entity (for example, a coffee shop run on space leased from the university); or
- University research involving children and youth (minors) (which is governed by the Ithaca-campus and Weill Cornell Medicine Institutional Research Boards).

Cornell strictly prohibits the operation of any Covered Program involving children and youth (minors) that does not adhere to these policy requirements and New York State requirements.

1.3 Policy Requirements

1.3.1 Conduct Expectations and Requirements for Program Directors: Program directors (see [Definitions section](#)) have responsibility for ensuring compliance with the measures set forth in this policy for every covered staff member and/or volunteer who will participate in Covered Programs involving children and youth (minors). Covered persons participating in Covered Programs are required to complete training related to the protection of minors prior to participating in Covered Programs involving minors. In addition, program directors are required to adhere to the following guidelines and standards when participating in Covered Programs involving minors:

- a) Know, understand, and communicate to all employees and volunteers the reporting requirements in this policy.
- b) Incorporate required procedures (youthsafety.cornell.edu) and contract clauses into any Covered Program, contract, or license with Cornell.
- c) Ensure virtual programs involving minors follow this policy.

1.3.2 Conduct Expectations and Requirements for Covered Persons: When participating in Covered Programs involving children and youth (minors), covered persons (see [Definitions section](#)) are required to adhere to the following guidelines and standards:

- a) Avoid situations and circumstances in which an adult has one-to-one contact with a minor in which that access also presents opportunities for secrecy or privacy.
- b) Comply with the published ratio of adult supervisors to participants for the duration of any Covered Program involving minors (www.acacamps.org/resource-library/accreditation-standards/aca-standards-relate-staff-screening-supervision-training).
- c) Preclude covered persons (or any third party) from picking up or dropping off minors absent a pre-existing relationship to the minor(s) and express permission from a respective parent or legal guardian.
- d) Refrain from the use of tobacco, alcohol, or illegal drugs during the Covered Program.
- e) Prohibit outside communications, including via social media, between minors and covered persons.

1.3.3 Conduct Expectations and Requirements for the Children and Youth Safety Program Administrator: The Children and Youth Safety Program Administrator (see [Definitions section](#)) has the responsibility for monitoring compliance with the measures set forth in this policy. Additional responsibilities include monitoring of government reporting obligations, such as New York State Mandated Reporter guidelines (ocfs.ny.gov/main/publications/Pub1159.pdf).

1.3.4 Registration: Program directors are required to register their Covered Programs annually with the Children and Youth Safety Program Administrator. Registration must be completed 30 days before the first day of the Covered Program. Any questions should be directed to the Children and Youth Safety Program Administrator.

1.3.5 Virtual Programs: The program director has responsibility for ensuring that all virtual programs (see [Definitions section](#)) involving children and youth (minors) are compliant with applicable governmental privacy requirements, such as the U.S. Children's Online Privacy

Protection Act (COPPA), state laws, and the European Union's General Data Protection Regulation (GDPR), if applicable. Contact the University Privacy Office for assistance.

1.3.6 Screening and Background Checks: Each covered person must clear a background check in accordance with [University Policy 6.6.2, Reference Checks, Information Verification, and Background Checks](#) before the first day of participating in a covered program involving children and youth (minors).

The program director is responsible for ensuring all covered persons associated with the Covered Program have been screened as required, received applicable training, and have been cleared before the first day of participating in the Covered Program involving minors.

The university has sole discretion to make determinations surrounding the necessity for background checks, or to preclude an individual from working with minors based upon the absence of or results associated with a background check.

1.3.7 Training: Program directors and covered persons are required to complete one of the following trainings that addresses identifying and responding to inappropriate interactions involving children and youth (minors) before the first day of participating in a Covered Program involving minors.

- Ithaca-based locations (includes Geneva and Cornell Tech): Successfully complete *RMI 2101 - Protecting Children: Identifying and Reporting Misconduct* (culearn.cornell.edu).
- Weill Cornell Medicine: Successfully complete *Maintaining a Harassment Free Workplace*, and *RMI 2101 - Protecting Children: Identifying and Reporting Misconduct* (learn.ue.org/LoginAndRegistration.aspx).

1.3.8 Parental Permission / Consent: The program director is responsible for obtaining written parental permission from a parent or legal guardian of the child or youth (minor) prior to the minor being allowed to participate in the Covered Program. The permission must be accompanied by disclosures of allergies, medical conditions, or any similar information that covered persons need to know to interact safely with the minor in the Covered Program.

1.3.9 External Entities: Prior to using university property for Covered Programs involving minors, the external entity (see [Definitions section](#)) must execute a license agreement or contract with the university that contains necessary terms and conditions. Questions and support regarding these terms should be discussed with the Office of General Counsel.

The license agreement or contract with the university requires the external entity to provide insurance coverage as outlined on the [Children and Youth Safety website](#).

1.3.10 Reporting Abuse: If you believe that a child or youth (minor) has been abused or mistreated, you are required to take the following steps:

- a) If the minor is in immediate danger or you require emergency assistance, call 911.
- b) If you suspect any abuse of the minor:
 - Tell your supervisor and the Cornell Children and Youth Safety Program Administrator (607-255-2800 or youthprogramadministrator@cornell.edu); and

- Call the New York State Child Abuse and Maltreatment Hotline: 800-342-3720 (when calling the hotline, make sure to obtain an ID number and the name of representative contacted); and
 - Call the Cornell University Police at 607-255-1111 (or the local police agency with jurisdiction over the location of the suspected abuse).
 - *Additional Weill Cornell Medicine requirement:* Report to New York Presbyterian Security at 212-932-4400. New York Presbyterian Security will notify Weill Cornell Medicine Risk Management of all reports.
 - *Additional Cornell Tech Campus requirement:* Report to Cornell Tech Safety and Security at 646-971-3611.
- c) Reporting officers (see [Definitions section](#)) are required to:
- Confirm that all mandated reporting has taken place in accordance with the “Reporting Abuse” provisions of this policy; and
 - Confirm that serious incidences of abuse (see [Definitions section](#)), including sexual abuse of minors, have been properly reported to public safety authorities and Risk Management and Insurance for disclosure to the university’s insurance carrier.

1.3.11 Reporting Bias: Program directors are required to report bias, discrimination, or harassment involving a member of the university community (faculty, staff, or student) to [Cornell’s Office of Institutional Equity and Title IX](#).

1.4 Collection and Retention of Information

Records associated with this policy are retained or disposed of in accordance with [University Policy 4.7, Retention of University Records](#).

The program director will retain documents and information for each child or youth (minor) participating in a Covered Program until four years after the minor reaches the age of 18 years -- excluding medical data that is no longer necessary, which should be deleted consistent with applicable records retention and disposal requirements (such as allergy disclosures of a minor no longer attending a Covered Program).

The program director will share collected information with the university that is necessary for the university to ensure the safety and security of the Covered Program participants and operation, such as names, birthdates, medical information, and housing details.

1.5 Compliance

The Children and Youth Safety Program Administrator, University Compliance Office, University Audit, and Office of Institutional Equity and Title IX may audit or investigate any Covered Program to assess compliance with this policy. In the event of such an audit, the program director is required to comply with reasonable requests and provide access to books, records, documentation, and any other information that may be necessary to assess compliance.

University community members (faculty, staff, or students) who are covered persons under this policy who fail to comply with the reporting requirements may face disciplinary action under the applicable university policy -- for example, [University Policy 6.11.3, Employee Discipline \(Excluding Academic and Bargaining Unit Staff\)](#) or the applicable collective bargaining agreement, up to and including termination, and/or the [Student Code of Conduct](#).

For external entities and Covered Programs, failure to comply with this policy may result in the summary suspension or termination of the Covered Program as well as requisite show cause to resume a Covered Program at Cornell.

1.6 Resources

[Children and Youth Safety website](#) (more information regarding procedures and programs)

University research involving children and youth (minors), which is governed by the Ithaca-campus and Weill Cornell Medicine Institutional Research Boards:

- Ithaca campus: *SOP 11: Informed Consent, Enrollment, and Other Considerations for Research Involving Children* (researchservices.cornell.edu/policies/irb-policy-11-research-involving-children)
- Weill Cornell Medicine: research.weill.cornell.edu/institutional-review-board-irb

2. To Whom This Policy Applies

- Ithaca-based locations (includes Cornell Tech)
- Weill Cornell Medicine – New York City
- Weill Cornell Medicine – Qatar
- Other: External Entity as defined in this policy

Who should read this policy:

All members of the university community

3. Definitions

Term	Definition
Abuse (of a minor)	<p>Harm committed by a person upon a child or youth (minor), by other than accidental means, including but not limited to serious physical or emotional harm, substantial risk of serious physical or emotional harm, neglect, or maltreatment. <i>See also</i> the New York State Office of Children and Family Services website for explanations and examples of such types of abuse: ocfs.ny.gov/main/cps/critical.asp</p> <p>Abuse (of a minor) under this policy also specifically includes such acts that qualify as sexual abuse or sexual performance. <i>See</i> the New York State Office of Children and Family Services website for explanations and examples of such types of abuse: ocfs.ny.gov/main/publications/pub1154text.asp</p> <p>Abuse (of a minor) under United Educators terms specifically includes:</p> <ul style="list-style-type: none"> ▪ Sexual misconduct - Any actual or alleged non-employee sexual harassment, child molestation, or any other sexual assault, sexual abuse, or wrongful sexual conduct ▪ Child molestation - Any actual or alleged sexual conduct with a minor ▪ Serial sexual misconduct - Any sexual misconduct: a) by a perpetrator who is not a student (as defined in this policy) and b) that harms more than one person
Background check	<p>Process of investigating a person’s criminal history and job-related or volunteer-related information. Background checks are required for all covered persons under this policy before commencing their engagement in a Covered Program involving children and youth (minors).</p>
Child or youth (minor)	<p>Individual under the age of 18 who is <i>not</i> (a) a student as defined in this policy or (b) an employee of the university.</p>
Covered person(s)	<p>Individual 18 years old or older (including owners, operators, program directors as defined in this policy, supervisors, employees, volunteers, Cornell resident advisors, and/or students) participating in a Covered Program or external entity program that works closely with, interacts, supervises, instructs, or otherwise has direct, non-incident contact with children and youth (minors) involved in a Covered Program under this policy. Covered persons are required to comply with the measures contained herein unless expressly excepted or specified measures are waived by the Children and Youth Safety Program Administrator.</p>
Covered Program(s)	<p>Organized activity, or set of activities, in which the university is knowingly supervising children and youth (minors), that is offered, operated, or sponsored by a university unit or an external entity. Examples include, but are not limited to, academic or recreation activities, day-camps, workshops,</p>

Term	Definition
	sports or coaches' camps, residential programs, commuter programs, conferences, and internships.
External entity	Organization that is a separate legal entity from the university.
Program director	Individual who is responsible for the management of a Covered Program, whether or not that individual possesses another job or position title.
Reporting officer	<p>For any Cornell entity, including, but not limited, to Cornell's Ithaca-based locations (including Geneva and Cornell Tech) and Weill Cornell Medicine, any individual holding one of the titles listed below or an equivalent position is required to report abuse of minors to Risk Management and Insurance:</p> <ul style="list-style-type: none"> ▪ President or chancellor or head of school ▪ Provost or chief academic officer ▪ Vice president of finance, chief financial officer ▪ Vice president and general counsel ▪ Vice president of student affairs ▪ Title IX coordinator ▪ Athletic department training director or head athletic trainer ▪ Athletic trainer ▪ Director of any dispensary, clinic, infirmary, student health center, athletic facility, or similar facility, maintained by a Cornell entity to provide medical, athletic training, psychological or mental health counseling services principally for use by Cornell employees or students
Student	Admitted applicant who has accepted the university's offer of admission to one or more of the university's degree programs <i>and</i> has commenced attendance at the university. Students are considered "in attendance" on the first day of the semester/term for which they were admitted; on the first day of their classes; on their first day residing in a university residence hall; on the first day of a university-sponsored pre-orientation trip, activity, or academic program in which they are participating; or on the first day of a graduate assistantship for the first semester/term for which they were admitted, whichever is earliest.
University property	For the purposes of this policy, university property encompasses all university-owned or controlled real property, venues, facilities, and space.
Virtual programs with children and youth (minors)	Online environment in which children and youth (minors) interact with others in a live and synchronous setting.

Term	Definition
Children and Youth Safety Program Administrator	Point of contact for any questions or issues regarding Covered Programs involving children and youth (minors). Provides policy clarifications, registers Covered Programs, and reviews reports of incidents involving minors.

4. Policy Administration

Policy Clarification and Interpretation	Contact	Phone	Email/Web Address
Ithaca-based locations	Children and Youth Safety Program Administrator	607-255-2800	youthprogramadministrator@cornell.edu youthsafety.cornell.edu
Weill Cornell Medicine – New York City	Children and Youth Safety Program Administrator	607-255-2800	youthprogramadministrator@cornell.edu youthsafety.cornell.edu

Any requests for clarification as to whether a particular program is covered under this policy, or a request for a waiver to particular policy measures, should be directed to the Children and Youth Safety Program Administrator. The Children and Youth Safety Program Administrator will assess the nature and severity of the potential risks to the program participants, the nature and level of interaction that students, employees, volunteers, and/or third-party operators would have with the children and youth (minors) participating in the program, and such other factors as the university deems relevant in determining any exemptions or excepted measure.

5. Appendix

5.1 Key Contacts

Topic	Contact	Phone	Email/website
Policy clarification and interpretation	Children and Youth Safety Program Administrator	607-255-2800	youthprogramadministrator@cornell.edu youthsafety.cornell.edu
Report abuse: Ithaca-based locations	Cornell Police	607-255-1111	cu_police@cornell.edu www.cupolice.cornell.edu
Report abuse: Cornell Tech	Cornell Tech Safety and Security	646-971-3611	security@tech.cornell.edu security.tech.cornell.edu
Report abuse: Weill Cornell Medicine	New York Presbyterian Security	212-932-4400	diversity.weill.cornell.edu/policies/title-ix
Report bias	Office of Institutional Equity and Title IX	607-255-2242	TitleIX@cornell.edu titleix.cornell.edu Online reporting link: cm.maxient.com/reportingform.php?CornellUniv&layout_id=6

6. Revision History

Date	Summary of Revisions
10/18/2021	<ul style="list-style-type: none"> Updated policy name to Children and Youth Safety and incorporated references to “children and youth” alongside “minors”. These changes were made to better distinguish this use of “minors” from the academic study meaning.
6/30/2021	<ul style="list-style-type: none"> Updated definition of Abuse (of a minor).
11/04/2020	<ul style="list-style-type: none"> Reinstated definition of Covered Program(s), which had been unintentionally removed in the previous revision.
10/16/2020	<ul style="list-style-type: none"> Applied revised policy template, which included adding “who should read this policy” and simplifying the list of key contacts.
07/09/2020	<ul style="list-style-type: none"> Updated Failure to Comply section for university community members.
06/26/2020	<ul style="list-style-type: none"> Originally issued