

# UNIVERSITY OF WISCONSIN SYSTEM'S REVIEW OF POLICIES RELATED TO THE REPORTING OF CRIMES AGAINST CHILDREN

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# Background

- UW System's program offerings are generally targeted towards adult learners, and existing policies reflect this focus
- Children are involved in a variety of UW-sponsored programs
- Children visit UW premises for a variety of reasons
- Challenges associated with serving and hosting youth:
  - ▣ Diversity of program offerings
  - ▣ Variety of physical environments
  - ▣ Multiple classifications of educators, staff, and other stakeholders

# Review Objectives

- Assessment of policies and efforts employed throughout the UW System and its colleges, universities, and extension related to protecting children
- Areas of consideration:
  - ▣ Sufficiency of policies and procedures
  - ▣ Availability and effectiveness of crime reporting mechanisms
  - ▣ Protocols used to investigate allegations of crime
  - ▣ Assessment of whether risks exist due to inadequate policies or procedures

# Overview of Procedures

- ❑ Reviewed existing state statutes and Regent Policy Documents
- ❑ Identified programs and activities directed towards youth occurring on UW premises or sponsored by UW institutions
- ❑ Obtained feedback from staff and faculty involved with law enforcement, risk management, human resources, athletics, recreation, camps, student affairs, housing, and pre-college and academic programs
- ❑ Performed site visits at a representative sample of institutions (UW-Green Bay, Madison, Milwaukee, Oshkosh, Parkside, Whitewater, UW Colleges, and Extension)
- ❑ Surveyed a sample of individuals at all UW institutions, including those where no site visit was performed
- ❑ Obtained and evaluated institution-specific policies
- ❑ Reviewed UW System and institution employee workplace rules and trainings related to children and their welfare
- ❑ Compared existing UW System policies to other public and higher education institutions, as well as youth-serving organizations
- ❑ Researched child safety and welfare resources published by reputable industry leaders

# Results

- Rapidly evolving landscape
  - ▣ Focus within higher education and by UW System administrators and program personnel amidst allegations of crimes against minors at other higher education institutions
  - ▣ Issuance of Executive Order #54 Relating to Supplemental Mandatory Reporting Requirements of Child Abuse and Neglect
- Acknowledgement of responsibility to ensure the welfare of youth
- Significant diversity exists in institution and program-specific policies and practices
- Consistency in policies would further mitigate risk
- Review identified eight comments falling into three categories:
  - ▣ Risk identification (4 comments)
  - ▣ Education/awareness (2 comments)
  - ▣ Clarification of policies and procedures (2 comments)

# Risk Identification Comments

- **Comment 1:** Revise criminal background check policy for individuals in a position of trust with respect to children (higher risk).

## Existing Policy

- Required for all new employees
  - Existing employees grandfathered at implementation (some mitigating factors)
  - Certain employee and non-employee groups excluded, unless required by institution-specific policy
- Term “position of trust” not defined
- No checks required after initial check is performed
- Includes implementation guidance

## Recommended Policy

- Require for all new employees
  - Perform check on grandfathered employees in a *position of trust with respect to children*
  - Expand to include employee and non-employee groups previously excluded (with some flexibility)
- Define “position of trust”
- Require checks for individuals in a *position of trust with respect to children* every four years
- Require self-disclosure of certain criminal offenses
- Expand guidance in certain areas
- Eliminate implementation guidance

# Risk Identification Comments, Continued

- **Comment 2:** Expand criminal background check requirements for select contractors and third parties (higher risk).
- **Comment 3:** Enhance screening processes for UW volunteers in a position of trust with respect to children (higher risk).
- **Comment 4:** Explore cost saving opportunities related to the criminal background check process (lower risk).

# Education/Awareness Comments

- **Comment 5:** Expand ongoing education/awareness efforts related to Executive Order #54 (higher risk).
- **Comment 6:** Communicate a reporting mechanism to report child abuse and neglect to UW volunteers in a position of trust with respect to children and youth participants in UW programs (higher risk).

# Clarification of Policies and Procedures

## Comments

- **Comment 7:** Establish a child safety and welfare policy (lower risk).
- **Comment 8:** Establish a children in the workplace policy (lower risk).

# Implementation of Audit Recommendations

- Board of Regents Approved of Board of Regents Resolution I.2.a.1.
  - ▣ Endorses recommendations
  - ▣ Encourages adoption of recommendations as soon as practicable
- Follow-up regarding status of implementation to be presented at future Business, Finance, and Audit Committee meeting of the Board of Regents

Questions?