

## **I. Introduction**

Illinois Tech is committed to providing a safe and secure environment for minors who participate in University programs. This Policy affirms that commitment by setting forth safety, reporting, screening, training and conduct requirements for individuals involved in University programs designed to serve children. This Policy specifically reflects the obligation that all University faculty, academic appointees, postdoctoral researchers, staff, student employees, contractors, and volunteers are to report known or suspected abuse or neglect of a child pursuant to applicable law.

## **II. Definitions**

“Abuse” means the maltreatment of a Child by a parent, step-parent, guardian, foster parent, immediate family member, paramour of the natural parent, any individual residing in the same home, any person responsible for the child's welfare at the time of the alleged abuse, or any person who came to know the Child through an official capacity or position of trust.

“Abused Child” is defined in the Abused and Neglected Child Reporting Act, [325 ILCS 5/3](#).

“ANCRA” means the Illinois Abused and Neglected Child Reporting Act, [325 ILCS 5](#).

“ANCRA Mandated Reporters” means all Illinois Tech faculty, other academic appointees, postdoctoral researchers, staff, student employees, and volunteers, regardless of rank or compensation status.

“Child” or “Minor” is defined as any person under the age of 18 years, unless legally emancipated, [325 ILCS 5/3](#).

“Covered Programs” include University programs designed to serve Minors including, without limitation, all activities, workshops, preparatory experiences, laboratories, open houses, tours, projects, research studies and events, whether for academic, pre-collegiate, experiential, athletic, educational, artistic, recreational or other purposes, and whether on or off University premises. Covered Programs also include, but are not limited to, day and overnight camps of any nature for Minors (e.g., sports camps, academic bridge programs, academic camps), and instructional activities. Covered Programs may also include programs, camps or activities that are conducted or provided by an outside entity or contractor on University premises or that are conducted or provided off-campus on behalf of or for the University. Entities and contractors that conduct or provide these Covered Programs shall be required by contract to comply with this Policy, and to demonstrate that the appropriate screening and training in accordance with this Policy has been

conducted before they commence services, as well as the acceptance of the University's insurance and indemnification requirements.

"Excluded Programs" are University undergraduate, graduate, professional or continuing education academic programs concerning which minor students are admitted and enrolled for academic credit, e.g., a seventeen-year-old who has matriculated to the University, regularly scheduled classes or activities designed primarily for enrolled students or individuals accepted for University enrollment, single instance visits by Minors to meet with faculty or other academic appointees to discuss academic, intellectual or career interests, single guest lectures or one-time participation in academic or research activities by academic guests, one-time events that take place on no more than two consecutive days, University single performance or single events such as fairs, festivals, convocations, campus tours, open houses, or other activities that are generally open to people of all age groups, and at or in which Minors may be present or participate, or University events at which Minors will be accompanied at all times by a parent or legal guardian. In addition, Excluded Programs include faculty-led, research studies subject to the review and approval of an Institutional Review Board ("IRB"), as these programs are governed by separate standards and oversight. This exception does not apply to ongoing group programs that may undergo IRB review.

"Neglect" means when a parent or a person responsible for the child deprives or fails to provide the child with adequate food, clothing, shelter, needed medical care, or supervision. A child is also considered neglected if he or she is subjected to an environment which is injurious insofar as: (1) the child's environment creates a likelihood of harm to the child's health, physical well-being, or welfare; and (2) the likely harm to the child is the result of a blatant disregard of parent or caretaker responsibilities. "Neglected Child" is defined in the Abused and Neglected Child Reporting Act, [325 ILCS 5/3](#).

### **III. Scope**

This Policy applies to all University personnel that are responsible for, involved or participate in, or have direct access to Minors or a University Covered Program including, without limitation, staff, faculty, academic appointees, postdoctoral researchers, student employees, contractors and volunteers.

### **IV. Illinois Abused and Neglected Child Reporting Act ("ANCRA") [325 ILCS 5](#)**

Under ANCRA, all "personnel of institutions of higher education" are mandated reporters and must immediately report any instance where there is reasonable cause to believe that a child known to them in their official capacity may be abused or neglected. All Illinois Tech personnel, regardless of rank or compensation status, are mandated reporters ("ANCRA Mandated Reporters). ANCRA Mandated Reporters must immediately report or cause a report to be made to the Illinois Department of Children and Family Services (DCFS) if they have reasonable cause to believe that a child known to them in their official capacity may be an abused or neglected child. In addition to the DCFS report, Illinois Tech personnel must promptly notify the Office of General Counsel that a report to DCFS has been made.

Illinois Tech encourages any person who is not an ANCRA Mandated Reporter to report abuse to DCFS if they have reasonable suspicion that a child has been abused or neglected. ANCRA protects the identity of all mandated reporters, and mandated reporters may be immune from legal liability as a result of reports that are made in good faith.

## **V. Registration of Covered Program**

At least on an annual basis, the director or official who has overall supervisory responsibility for the Covered Program is required to register the program with Human Resources by completing a [Covered Program Registration Form](#). The annual deadline to submit proposed Covered Programs for the next calendar year is November 1 of the preceding year. For Covered Programs developed and proposed subsequent to the annual deadline, the responsible department shall submit a request to Human Resources no less than sixty (60) days prior to the proposed start of the Covered Program. Information required as part of registration may include but is not limited to program name; division, school or other; type of program; number and age of participants; program frequency; dates and hours of operation; location(s) on campus of program; and designated program contact information. Criminal history checks are required for Illinois Tech staff, faculty, contractors, students and volunteers participating or involved in a Covered Program pursuant to Illinois Tech's [Background Checks: Pre-Employment Activities Involving Minors](#) policy. Please note, additional information may be required for individuals with direct contact with minors in order to assign training and complete a background check process. The University, in its sole discretion, may require additional measures and training dependent upon the safety precautions it deems necessary. Failure to submit a registration form in compliance with this Policy may result in suspension of the Covered Program.

## **VI. Training**

All Illinois Tech personnel must complete mandated reporter training prior to employment and annually thereafter. Additionally, ANCRA mandated reporter training is required for any individual involved in a Covered Program that has not been required to complete training as part of Illinois Tech's annual training cycle.

Illinois Tech's training is intended to address the following topics: (i) indicators for recognizing child abuse and child neglect, as defined under ANCRA; (ii) the process for reporting suspected child abuse and child neglect under ANCRA and the required documentation; (iii) responding to a child in a trauma-informed manner; (iv) understanding the response of child protective services and the role of the reporter after a call has been made; and (v) implicit bias. Upon training completion, ANCRA Mandated Reporters must complete and submit the [DCFS Acknowledgement Form](#) to the following email address: [hr@iit.edu](mailto:hr@iit.edu). Illinois Tech may require Title IX training and specific programming for certain Covered Programs. Upon submission of the Covered Program Registration Form, individuals must contact the Office of Title IX Compliance and HEA Compliance for more information.

## **VII. Covered Programs that involve Overnight Stays**

Covered Programs that include overnight stays or use of University housing by Minors shall have the following additional measures in place: (i) conspicuous identification to be worn by faculty, other academic appointees, postdoctoral researchers, staff, student employees and volunteers and, if appropriate, Minors in the Covered Program; (ii) enforced curfews; (iii) alcohol and drug-free housing and facilities; (iv) a code of conduct for Minors in the Covered Program; and (v) full-time residential supervision.

## **VIII. Compliance**

All Covered Programs are subject to periodic compliance audits by Human Resources and the Office of General Counsel. University personnel who fail to adhere to the requirements of this Policy may be subject to corrective action up to and including termination of employment and, if in the case of a student employee, referred to the student disciplinary process.

## **IX. Contact Information**

For information regarding ANCRA Training; and Title IX Training, please contact:

Office of Title IX Compliance and HEA Compliance  
Michael Paul Galvin Tower  
10 West 35th Street, 10th Floor, Room 10C3-1  
Chicago, IL 60616  
[titleix@iit.edu](mailto:titleix@iit.edu)  
Virginia Foster  
Title IX Coordinator  
312-567-5725  
foster@iit.edu

For information regarding Covered Program Registration, please contact:

Office of Human Resources  
Michael Paul Galvin Tower  
10 West 35th Street, 13th Floor  
Chicago, IL 60616  
312-567-3318  
[hr@iit.edu](mailto:hr@iit.edu)

To report suspected child abuse or neglect, please contact:

Illinois Department of Children & Family Services  
60 E. Van Buren Street, Suite 1339  
Chicago, IL 60605  
Child Abuse Online Reporting System: <https://childabuse.illinois.gov/>  
1-800-25-ABUSE