

Policy on the Reporting of Child Abuse and Neglect

Current policy and proposed amendments



Overview of Current Law and Board Policy

Illinois Law:

The *Abused and Neglected Child Reporting Act* requires all school district employees in Illinois to immediately report suspected child abuse or neglect to DCFS (325 ILCS 5/4).

Current Board Policy:

CPS' *Policy on the Reporting of Child Abuse and Child Neglect*, adopted in its current form in July 2008, requires similar mandatory reporting to DCFS, and outlines in detail how reports of abuse or neglect should be handled by district and school staff.



Main Components of the Revised Policy

1. Definitions
2. Training
3. Reporting Reasonable Suspicions of Child Abuse and Neglect
4. Providing Supports to Students
5. Reporting Grooming and Inappropriately Intimate Behaviors
6. Cooperating with DCFS and other Agencies
7. Internal Reporting and Investigations
8. Penalties
9. Delegation



1. Definitions

Amend to explicitly call out ‘grooming’ as a form of sexual abuse.

- Grooming is defined as “behavior an adult uses to build an emotional connection with children to gain their trust and break down their inhibitions for the purpose of sexual abuse.”

Grooming is a pattern of behavior that can include texting, spending time alone together, crossing physical boundaries like touching or hugs, giving gifts, etc.



2. Training

Amend to require re-training by employees annually.

- Current policy requires training upon hire, but not periodic re-training. This amendment requires training for mandated reporting to be repeated annually by all employees.

New clause also instructs the district to create and train appropriate employees on Guidelines for Investigating Allegations of Child Abuse.



3. Reporting of Child Abuse or Neglect

Under current policy, a mandated reporter must immediately call DCFS, then he/she may notify the principal.

- Amendment changes the principal notification to a required act.
- If a mandated reporter fears retaliation, he/she must instead report to a Network Chief.

Proposed amendments also clarify that while the principal has a vital role in gathering information about potential child abuse or neglect, principals are not trained investigators.



4. Providing Supports to Students

Under the amended policy, principals continue to be responsible for the following actions to support students:

- (a) Calling 911 if students are in need of medical attention
- (b) Not allowing students to return home if the principal believes it to be dangerous
- (c) Notifying each of the child's teachers

Proposed amendment would add a principal's obligation to assign a mental health professional to support the student, and to call CPS' Crisis Management Team.



5. Reporting ‘Grooming’ and Inappropriately Intimate Behaviors

This new section specifies that:

- (a) ‘Grooming’ is child abuse and requires mandatory reporting
- (b) If the employee does not have suspicion that abuse has occurred, or is not sure if their observations and/or information constitute suspicion of abuse, the employee must report the information to their principal as soon as possible.
- (c) When a principal receives this report, they must either follow the mandated reporting requirements to DCFS if they suspect it constitutes abuse, or they must file an incident report detailing the specifics of the inappropriately intimate behaviors by an adult.



6. Cooperation with DCFS and other agencies

Current policy requires employees to cooperate with DCFS investigations, including:

- Following procedures for interviewing students and staff
- Protocols for responding to students being taken into protective custody at school
- Responding to requests for records and subpoenas
- Recordkeeping upon notification of DCFS investigative results

No substantive amendments to this section are proposed.



7. Internal Reporting and Investigations

Current policy requires employees and volunteers to cooperate with CPS investigations into child abuse or neglect. Proposed amendments expand that requirement to vendors, as well.

Proposed amendments codify CPS practice that “when an allegation is made of an adult sexually abusing a student, the adult will be removed from contact with students pending the result of an investigation.”



8. Penalties

Current policy outlines the following:

- Mandated reporters who fail to report child abuse, neglect, grooming or inappropriately intimate behaviors between an adult and child is subject to discipline, up to and including termination.
- Any principal who discourages a report or asks a reporter to modify their report is subject to discipline, up to and including termination.
- The State Superintendent of Education may suspend or revoke the license of any educator who willfully fails to report abuse or neglect.
- Failure to report abuse or neglect is a Class A misdemeanor for a first offense and a Class 4 felony for the second violation.



9. Delegation

Proposed amendment delegates authority to the CEO or his/her designee to create guidelines to implement and enforce the policy.



Summary of Key Proposed Amendments

- Defines ‘grooming’ as a form of sexual abuse and requires mandatory reporting to DCFS
- Requires mandated reporters to notify their principal after they have notified DCFS of their suspicion of child abuse or neglect
- Requires employees to report any ‘grooming’ or ‘inappropriately intimate behaviors’ to the principal as soon as possible, and requires the principal to document the reporter’s information
- Requires annual re-training of all employees on mandated reporting obligations under law and CPS policy

