Alain Locke Charter School

Mandated Reporter, Faith's Law, and Professional Conduct Policy

Reporting Child Abuse, Neglect, Sexual Misconduct, Grooming, and Boundary Violations

I. Purpose and Scope

Alain Locke Charter School is committed to the safety, protection, and well-being of all students. This policy establishes obligations to recognize and report suspected child abuse and neglect, sexual misconduct, grooming, and inappropriate adult–student relationships; maintain professional boundaries; and respond appropriately to concerns. It incorporates Faith's Law (105 ILCS 5/22-85.5), the Illinois Educator Code of Ethics (23 Ill. Adm. Code 22.20), and applicable mandated reporting and Title IX obligations.

This policy applies to employees, administrators, teachers, instructional and support personnel, substitutes, counselors, nurses, social workers, contractors, consultants, vendors, volunteers, board members, and other adults working with or participating in school programs ("Covered Individual Adults"). Whether a person is legally a mandated reporter is determined by applicable Illinois law; all Covered Individual Adults must follow the school's professional conduct and internal reporting rules.

II. Definitions

Mandated Reporter; Abuse and Neglect

A mandated reporter is a person designated under the Illinois Abused and Neglected Child Reporting Act who must immediately report reasonable cause to believe a child known in a professional or official capacity may be abused or neglected. Abuse may include physical or sexual abuse, grooming, excessive or corporal punishment, or exploitation. Neglect may include failure to provide adequate food, shelter, clothing, supervision, or necessary care, as defined by law.

Sexual Misconduct

Consistent with Faith's Law, sexual misconduct includes any act—verbal, nonverbal, written, electronic, or physical—by a school employee or agent with direct student contact, directed toward or with a student to establish a romantic or sexual relationship. Under CPS Policy 511.1, any sexual or romantic conduct between a Covered Individual Adult and a student constitutes sexual misconduct. Examples include:

- Sexual or romantic invitations; dating or soliciting a date.
- Sexualized or romantic dialogue or sexually suggestive comments directed toward or with a student.
- Sexual, romantic, or erotic self-disclosure or physical exposure.
- Sexual, indecent, romantic, or erotic contact with a student.

Grooming

Grooming is behavior used by a person in a position of trust or authority to build an emotional connection with a student, gain trust, and reduce inhibitions for a sexual purpose. Illinois criminal law (720 ILCS 5/11-25) also defines grooming through certain in-person, written, electronic, or third-party acts intended to entice a child into unlawful sexual conduct. Warning signs may include gifts or special privileges, isolating

a student, unauthorized transportation, secretive messaging, or crossing physical boundaries. A concern must be reported without waiting for proof of sexual abuse.

Boundary Violation

A boundary violation is an act, omission, or pattern without a legitimate educational purpose that abuses the adult–student professional relationship or has the potential to harm a student. A boundary violation may require internal reporting even when it does not independently establish reasonable cause for a DCFS report.

III. Mandated Reporting and Internal Notification

Immediate DCFS Report

Any mandated reporter with reasonable cause to believe a child is abused or neglected, including grooming as defined by Illinois law, must immediately personally contact the DCFS Child Abuse Hotline at 1-800-252-2873 (1-800-25-ABUSE), available 24/7. Reasonable cause—not proof—is sufficient. A report to a supervisor alone does not satisfy this legal duty. Do not conduct an independent investigation or delay a report while seeking permission.

Internal Reporting and Escalation

After contacting DCFS, promptly notify the Principal or designee. If the concern involves the Principal or reporting to the Principal is unsafe, notify the Board Chair or designated alternate school authority. Concerns about sexual misconduct, grooming, suspected abuse by a school-affiliated adult, or boundary violations must also be promptly referred through applicable CPS Office of Student Protections and Title IX reporting channels and documented in the required incident-reporting system. Internal reports do not replace DCFS or Title IX reporting obligations.

Where a boundary violation does not create reasonable cause to suspect abuse or neglect, report it promptly to the Principal or alternate school authority for assessment, documentation, and appropriate CPS/OSP referral. If reasonable cause later arises, immediately report to DCFS.

Confidentiality and Family Communication

Share information only with those who have a legitimate need to know, including DCFS, law enforcement, authorized investigators, and appropriate school personnel. Do not alert a parent or guardian to a suspected abuse or neglect investigation involving that parent, guardian, or household member; coordinate with DCFS/law enforcement. Separate Faith's Law student/parent notice duties for alleged employee sexual misconduct are addressed in Section VII and must be coordinated with investigators.

IV. Employee Code of Professional Conduct and Boundaries

Alain Locke incorporates the Illinois Educator Code of Ethics, 23 Ill. Adm. Code 22.20. All adults must maintain age- and developmentally appropriate, professional relationships with students on and off campus, during and outside school hours. Prohibited conduct includes:

- Romantic or sexual relationships, flirting, sexualized jokes, comments, images, or discussions with students.
- Inappropriate touching, prolonged intimate physical contact, or any corporal punishment.
- Favoritism, targeted gifts, pet names, secrets, or confiding in students in a way that creates an overly personal relationship.

- Unnecessary isolated one-on-one interactions, visits to homes, or off-campus meetings without an approved educational purpose.
- Private texting, personal email, direct messaging, or social-media connections with students outside approved school communication systems.

Transporting Students

Covered Individual Adults must not transport students in personal vehicles without advance written authorization from both the Principal and the student's parent/guardian, except as otherwise permitted by law or an approved emergency procedure. Transportation must serve an authorized school purpose, comply with school travel/safety rules, and be documented. The school should verify the driver's license and insurance and arrange an additional adult when practicable. Unauthorized rides, particularly isolated one-on-one transportation, are potential boundary violations.

Taking, Possessing, Sharing, or Posting Student Photos and Videos

Covered Individual Adults must not take, possess, send, forward, share, or post photographs or videos of students for personal use. School-related images or recordings may be created or shared only for an authorized educational or school purpose, with required parent/guardian media consent, and through approved school devices, accounts, platforms, and procedures. Do not send student images through personal messaging or social-media accounts, and do not disclose or redistribute images received from others without authorization. Never create, request, possess, or distribute sexualized images of students; immediately report and preserve evidence as directed by authorities without further circulation.

Meetings and Communication Outside Professional Duties

Adults must not initiate private social contact, non-school meetings, or personal relationships with students outside their professional roles. Any exceptional school-related contact outside normal duties requires advance administrative approval and appropriate parent/guardian awareness, documentation, and safeguards.

V. Training and Reporting Duties Under Title IX

All employees and other legally mandated reporters must complete DCFS mandated reporter training as required by Illinois law, including required periodic refreshers, and school-required training on recognizing abuse, grooming, educator ethics, professional boundaries, trauma-informed response, and reporting. All employees must promptly report potential policy violations by other adults. Allegations of sex-based discrimination or harassment must also be referred to the school's Title IX Coordinator and processed under applicable Title IX procedures; a Title IX report does not substitute for a DCFS report when required.

VI. Student Safety, Investigations, and Nonretaliation

School leadership will promptly assess immediate safety, call 911 for emergencies, provide access to counseling or mental-health support, and cooperate with DCFS, law enforcement, CPS, and authorized investigations. Personnel must preserve relevant records and must not interview students beyond what is necessary to ensure safety and make a report. No person may retaliate against anyone who reports concerns in good faith or participates in an investigation. Violations, including failure to report another employee's conduct, may result in discipline up to termination and other consequences under law.

VII. Faith's Law Student and Parent/Guardian Notifications

When an employee, school agent, or contractor is alleged to have engaged in sexual misconduct with an enrolled student, the school will follow the notification procedures required by 105 ILCS 5/22-85.10. Notice to the student must be developmentally appropriate; written notice to the parent/guardian generally follows as soon as feasible, coordinated with any DCFS or law-enforcement investigation and applicable statutory exceptions. Required notice identifies the allegation and available school/community resources, including applicable student-support coordinator information.

When the governing body takes formal employment action after an investigation—including termination or acceptance of resignation—the school will provide the additional notices required by law, including the action taken, applicable reporting to state education authorities, and available resources. Notices must account for a student's IEP/504 plan and legal exceptions (including adult or emancipated students and cases involving a parent/guardian as alleged perpetrator). School leadership will consult counsel and investigative authorities on timing and content.

VIII. Faith's Law Employment History Reviews

Before hiring an applicant for a position involving direct contact with students, or engaging covered contractor personnel, Alain Locke will complete the employment-history review steps required by Faith's Law (105 ILCS 5/22-94), including required applicant disclosures and requests to current/former employers, and maintain records subject to applicable confidentiality and retention requirements. This process supplements, rather than replaces, background checks and other screening requirements.

IX. Publication, Annual Submission, and Review

This policy will be posted on the school website and included in applicable employee, student, and parent/guardian handbooks. The school will notify families of the availability of ISBE's sexual-abuse response and prevention resource guide at the beginning of the school year and provide it upon request.

As required by the CPS charter contract, Alain Locke will submit its Faith's Law-compliant policy to CPS on the effective date of its charter contract and annually no later than July 1 thereafter, accompanied by a summary of revisions since the prior submission, if applicable. School leadership will review this policy at least annually and update it for changes in law, CPS requirements, and school procedures.

X. Resources and Contacts

- DCFS Child Abuse Hotline (24/7): 1-800-252-2873 (1-800-25-ABUSE).
- Emergency services: 911.
- Alain Locke Charter School Principal: 773-265-7233 / 773-265-7232.
- School Social Worker and Counseling Team: 773-265-7243.
- CPS Office of Student Protections and Title IX: 773-535-4400; ospcompliance@cps.edu.
- ISBE Faith's Law guidance: https://www.isbe.net/Documents/Faiths-Law-Guidance-FAQ.pdf
- CPS Policy 511.1: https://www.cps.edu/sites/cps-policy-rules/policies/500/511/511-1/