



NORTHWESTERN
UNIVERSITY

Responsible University Official: Provost,
Senior Vice President of Business and
Finance, Vice President for Student Affairs
Responsible Office: Office of Human
Resources
Origination Date: October 11, 2013

REPORTING SUSPECTED CHILD ABUSE AND NEGLECT

Policy Statement

Northwestern University places the highest emphasis on the safety and well-being of its students, faculty and staff. The University places the same emphasis on the safety and well-being of its visitors and particularly those visitors who are minors.

Reason for Policy/Purpose

Minors may visit the campus for a number of reasons, including but not limited to visits as matriculated or prospective students or as part of an athletic, cultural, or academic camp or program. The protection of minors, especially from physical or sexual abuse, is a core value of Northwestern University, and every member of the campus community has an obligation to comply with the provisions of this policy. Furthermore, the Illinois Abused and Neglected Child Reporting Act specifies that all University employees are mandated reporters of suspected cases of child abuse and/or neglect. Accordingly, this policy sets forth the obligations of all University community members who may reasonably believe that a child may be abused or neglected.

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Who Approved This Policy

Provost
Senior Vice President for Business and Finance
Vice President for Student Affairs

Who Needs to Know This Policy

All members of the Northwestern University community.

Website Address for this Policy

http://policies.northwestern.edu/docs/Reporting_Child_Abuse_and_Neglect.pdf

Contacts

If you have any questions on the Reporting Suspected Child Abuse and Neglect Policy, you may:

1. Call HR Consulting Services in Chicago at 312-503-8481 or in Evanston at 847-491-7507 or
 2. Send an e-mail to report-child-abuse@northwestern.edu
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Definitions¹

Child or Minor: Any person under the age of 18 years.

Abused Child: A child is abused when an individual:

- a. inflicts, causes to be inflicted or allows to be inflicted, physical injury by other than accidental means, which causes death, disfigurement, impairment of physical or emotional health, or loss or impairment of any bodily function to such child;
- b. creates a substantial risk of physical injury to the child by other than accidental means which would be likely to cause death, disfigurement, impairment of physical or emotional health, or loss or impairment of any bodily function;
- c. commits or allows to be committed any sex offense against such child, including all sexual acts, fondling a child, or having the child touch the person in a sexual manner;
- d. commits or allows to be committed an act or acts of torture upon such child;
- e. inflicts excessive corporal punishment upon such child; or
- f. causes an illegal controlled substance to be sold, transferred, distributed or given to a child.

Neglected Child: A neglected child is any child who is not receiving the proper or necessary nourishment or medically indicated treatment including food or care, or otherwise is not receiving the necessary support or medical or other remedial care or other care necessary for his or her well-being, including adequate

¹ This section includes an adaptation of the applicable legal definitions. The complete definitions can be found at 325 ILCS 5/3.

food, clothing or shelter; or who is abandoned by his or her parents or other person responsible for the child's welfare. Neglect may also include failure to provide adequate supervision to a child, such as when a child is left unsupervised or left in the care of someone incapable.

Policy/Procedures

Mandated Reporters

All University employees (including all faculty, staff, and student employees) regardless of their position or assignment, are required by law (under the Abused and Neglected Child Reporting Act (ANCRA), 325 ILCS 5/1 *et seq.*) and by University policy to report suspected cases of child abuse and/or neglect. All students, volunteers, and third-party contractors are required by University policy to report suspected cases of child abuse and/or neglect. All employees shall complete the Illinois Department of Children and Family Services *Acknowledgment of Mandated Reporter Status* form, which shall be retained by the University.

Reporting Suspected Abuse and/or Neglect

University policy requires reporting parties to follow the below steps, which include applicable legal requirements.

1. In an emergency situation, in addition to contacting DCFS as explained below, reporting parties should immediately contact the Northwestern University Police Department (847-491-3246) or, if the reporting party is not on campus, local police at 911.
2. In *all* cases, any University community member having reasonable cause to believe that a child may be abused or neglected shall immediately make a report to the Department of Children and Family Services (DCFS) by calling the DCFS Hotline at 1-800-25ABUSE.² **Any doubt about reporting a case of suspected abuse or neglect is to be resolved in favor of making a report immediately.** Validation of suspected child abuse or neglect is the responsibility of DCFS, who may be assisted by the local police department. The role of a reporting party is not to investigate the matter, but rather, to report what is known, which should include the name and address of the child and his or her parents or other persons having custody; the child's age; the nature of the child's condition including evidence of any previous injuries or disabilities; and any other information that the person filing the report believes would be helpful in establishing the cause of such abuse or neglect and the identity of the person(s) believed to have caused such abuse or neglect.
3. After contacting DCFS (and police if necessary), the individual making the report shall also immediately notify (i) his/her supervisor, when the reporter is faculty, staff, or a student employee, or (ii) the Dean of Students, when the reporter is a student.³ The

² If the suspected abuse or neglect is occurring outside Illinois, individuals should contact both Illinois DCFS and the applicable state agency (contact information for each state is available at http://www.childwelfare.gov/pubs/reslist/rl_dsp.cfm?rs_id=5&rate_chno=W-00082). Call the Office of General Counsel (847-491-5605) if you have any questions about out-of-state reporting.

³ In lieu of contacting a supervisor/Dean of Students, reporting parties may directly notify the Associate Vice President for Human Resources, the Associate Provost for Faculty, the Vice President for Student Affairs, or the Title IX Coordinator.

supervisor/Dean of Students shall document that such report has been made and notify the Associate Vice President for Human Resources (in the case of a report made by a staff member, student employee, or other party), the Associate Provost for Faculty (in the case of a report made by a faculty member), or the Vice President for Student Affairs (in the case of a report made by a student). In the event of a report of *sexual* abuse, the reporting individual shall also notify Northwestern's Title IX Coordinator in the University Sexual Harassment Prevention Office (847-491-3745).*

4. For legally mandated reporters (all University employees), the DCFS telephone report must be verified in writing within 48 hours, by completing the DCFS Form entitled "Written Confirmation of Suspected Child Abuse/Neglect Report: Mandated Reporters." Copies of the written report shall be sent to (i) the Illinois Department of Children and Family Services, Attention: Child Protective Services, 406 East Monroe Street, Springfield, Illinois 62701, and (ii) the reporting party's supervisor. * Legally mandated reporters cannot make anonymous reports.
5. Individuals who make a report shall cooperate with the investigating agency and/or police. University personnel must verify each investigator's identification before providing information regarding the alleged case of child abuse and/or neglect.

No Retaliation

Under no circumstances shall any University supervisor or administrator exercise any control, restraint, modification, delay or other such change in the report or the forwarding of such reports to DCFS or to others as specified in this policy. The University shall not retaliate in any manner against any individuals who make good faith reports of suspected child abuse or neglect or who act as witnesses to testify in any investigation or proceeding concerning a report of child abuse or neglect. Likewise, under Illinois law, any individuals who make good faith reports of suspected child abuse or neglect to DCFS or who act in good faith as witnesses to testify in any investigation or proceeding concerning a report of child abuse or neglect are immune from civil or criminal liability.

Training

All University community members are encouraged to participate in mandated reporter training. All University employees who have regular contact with children through their affiliation with the University shall submit a certificate of completion of the DCFS online training for mandated reporters (available at <https://www.dcfstraining.org/manrep/index.jsp>) or attend an in-person training provided by the University, records of which will be maintained by the University. Such certificate or record of attendance must be provided upon hiring (or upon approval of this policy) and again at intervals of no greater than every 3 years thereafter. It is University supervisors' responsibility to determine who should be trained under this policy and to maintain appropriate documentation.

* If the reporting party learns of suspected abuse or neglect in connection with a privileged relationship and is uncertain about their ability to report internally within the University, the reporting party should contact the Office of General Counsel (847-491-5605) for advice.

Consequences of Noncompliance

Any University employee or student who fails to report suspected child abuse and/or neglect, who fails to cooperate with the investigating agency and/or police in accordance with this policy, or who otherwise violates this policy shall be subject to discipline up to and including discharge or exclusion from the University. Knowingly transmitting a false report or, in the case of mandated reporters, knowing and willful failure to report, can also result in criminal sanctions.

Any University employee or student who is determined after an investigation to have engaged in physical or sexual abuse of a child will be subject to disciplinary action up to and including discharge or exclusion from the University.

In addition, the University shall discipline any employee or student who retaliates against any person who, in good faith, has reported suspected child abuse and/or neglect or who testifies, assists, or participates in any investigation, hearing, or proceeding relating to such allegations.

Any third-party contractor or volunteer who violates any provision of this policy may have their relationship with the University terminated.

Forms/Instructions

Acknowledgment of Mandated Reporter Status form

https://nupa.northwestern.edu/psp/pa91prod_direct/EMPLOYEE/HRMS/c/NW_SELF_SERVICE.NW_DCFS_ATTEST.GBL&cmd=login

Written Confirmation of Suspected Child Abuse/Neglect Report: Mandated Reporters form

<http://www.state.il.us/DCFS/docs/cants5.pdf>

DCFS online training for mandated reporters <https://www.dcfstraining.org/manrep/index.jsp>

Appendices

[Appendix A: Northwestern University Guidelines Regarding Boundaries with Minors](#)

Related Information

For additional guidance on University programs or activities involving minors, please see the Northwestern University Guidelines Regarding Boundaries with Minors, attached hereto as Appendix A.

History/Revision Dates

Origination Date: October 11, 2013

Last Amended Date: NA

Next Review Date: October 1, 2014