

Southern Illinois University Edwardsville

Early Childhood Center

Policy on Immigration Enforcement and Child and Family Privacy

Effective Date: January 1, 2026

Purpose

Pursuant to Illinois Public Act 104-0440, this Policy establishes the Southern Illinois University Edwardsville (SIUE) Early Childhood Center's procedures for responding to interactions with federal, state, or local government agencies; maintaining confidentiality; protecting children, families, and staff; and ensuring lawful communication related to government or immigration enforcement activity. This Policy aligns with Illinois Department of Children and Family Services (DCFS) licensing requirements, applicable federal and state laws, and SIUE institutional policies, and affirms the University's commitment to safety, transparency, and the protection of individual rights.

PARENT-FACING SUMMARY

SIUE Early Childhood Center Commitment to Families

The SIUE Early Childhood Center is a safe, welcoming place for all children and families, regardless of citizenship or immigration status.

We are committed to:

Protecting family privacy and confidential information

Requiring legal documentation before releasing information or children

Not sharing immigration or citizenship information unless required by law

Notifying families if immigration enforcement activity affects the center, when permitted

Our staff receive training on child safety, confidentiality, and family rights. If you have questions or wish to update emergency contacts, please contact the ECC office.

Non-Discrimination Commitment

The SIUE Early Childhood Center affirms that all children and families are welcome and may participate fully in ECC programs and services regardless of actual or perceived immigration or citizenship status. ECC staff shall not threaten to disclose, nor disclose, information related to citizenship or immigration status, except when disclosure is required by federal or state law and reviewed by appropriate legal counsel.

1. Private Facility and Restricted Access Notice

The SIUE Early Childhood Center is a restricted-access childcare facility.

Access is limited to:

- Authorized ECC staff and student workers
- Enrolled children and their approved family members
- Approved visitors and university partners

All entrances and staff-only areas must display signage indicating restricted access and private property status.

2. Confidentiality of Child, Family, and Employee Information

All records and personal information related to children, families, employees, and student workers are confidential.

Information will not be released without:

- Written parental or employee consent, **or**
- A valid judicial warrant, subpoena, or court order, **or**
- A legal requirement under applicable law.

All disclosures must comply with SIUE privacy, records retention, and compliance policies.

3. Procedures for Government Agency Arrival or Contact

(Federal, State, or Local — Including Immigration Enforcement)

If any government agency representative appears on site, attempts to enter the facility, or contacts the ECC by phone or other means, staff must follow the steps below **in order**.

Step 1: Immediately Notify SIUE Campus Police and ECC Administration

Staff must notify, without delay:

- **SIUE Campus Police**, and
- **ECC Director and/or ECC Program Administrator / Business Operations Administrator**

This ensures safety, situational awareness, and coordination with university leadership and legal counsel.

Step 2: Do Not Allow Entry

Staff shall not permit entry into ECC facilities or restricted areas.

If communication is necessary, staff may speak through a door or window while maintaining restricted access.

Step 3: Request Identification and Legal Authority

Staff may request identification and ask whether the individual possesses a **valid judicial warrant**.

- Administrative warrants or requests (including immigration Forms I-200 or I-205) do **not** authorize entry.
- Staff must not interpret or validate legal documents.

Step 4: Contact SIUE Office of General Counsel

ECC administration and/or SIUE Campus Police will contact the **SIUE Office of General Counsel** for legal guidance and direction.

Step 5: Protect Children and Confidential Information

- No child shall be released to any government agency without a court order reviewed by legal counsel.
- Staff shall not disclose information related to enrollment, attendance, family information, or immigration status unless legally required and approved by counsel.

Step 6: Documentation

All interactions must be documented, including:

- Names and badge numbers
- Agency name
- Time and duration of contact
- Requests made and responses given
- Actions taken by ECC staff

Documentation will be retained in accordance with SIUE records retention policies and DCFS requirements.

4. Rights of Staff During Government or Enforcement Encounters

All ECC employees and student workers will receive written notice of their rights, including:

- The right to remain silent
- The right to legal counsel
- The right to refuse searches without consent or warrant
- The right to decline signing documents without legal review
- The right to document encounters

5. Staff Access to This Policy

This policy will be available through:

- ECC administrative office

6. Training and Annual Review

This policy will be:

- Reviewed annually or as laws change
- Included in new-hire orientation
- Reviewed during annual policy update trainings

7. Emergency Contact and Child Safety Procedures

Each child must have at least **three emergency contacts** on file, which must be **reviewed and updated at least twice per year**, and more frequently as needed.

If a parent or guardian is unavailable:

1. Emergency contacts will be called in order
2. Photo identification will be verified prior to release
3. All attempts will be documented

If no authorized adult can be reached, ECC administration will follow DCFS child safety procedures and document all actions taken.

8. Parental Consent for Disclosure of Confidential Information

Confidential information will not be released without written consent unless legally required.

When permissible:

- Parents will be notified of requests
- Signed consent forms will be retained in the child's record
- All disclosures will be logged

9. Documentation and Recordkeeping

All actions involving government agency contact, Campus Police involvement, legal review, confidential disclosures, and emergency contact use must be fully documented and retained in accordance with SIUE and DCFS requirements.

Clarifying Statement

Involvement of SIUE Campus Police is intended to ensure safety, protocol compliance, and coordination with university legal counsel and does not authorize entry into ECC facilities absent a valid judicial warrant.

COVER MEMO – DCFS LICENSING FILE

To: DCFS Licensing Representative

From: SIUE Early Childhood Center

Re: HB1312 Compliance – Immigration Action Policy

Date: 12/22/2025

The Southern Illinois University Edwardsville Early Childhood Center has adopted the enclosed **Policy on Immigration Enforcement and Child and Family Privacy**, effective January 1, 2026.

This policy aligns with DCFS guidance issued December 9, 2025, and addresses required procedures related to immigration enforcement response, confidentiality, non-discrimination, parental notification, emergency contacts, and documentation.

The ECC will review this policy annually and provide staff training to ensure continued compliance with DCFS licensing requirements.

Please contact the ECC Director with any questions.

Respectfully,

Rebecca Dabbs

ECC Director

