

## Policy on the Safety of Students in Laboratory Schools Programs

Employee Code of Conduct: Standards of Behavior for Employees Regarding Appropriate Relationships  
with Students

Effective as of: June 15, 2023

The University of Chicago Laboratory Schools is committed to providing a safe and secure environment for all children and young adults in our community. The guidelines stated below are informed by the University's [Safety of Children in University Programs](#) Policy and the [Illinois Abused and Neglected Child Reporting Act](#), the provisions of the Illinois School Code at 105 ILCS 5/22-85.5<sup>1</sup> as well as the best practices in Nursery–Grade 12 teaching described by our guiding professional organizations, such as the [National Association of Independent Schools](#) (NAIS) and the [Independent Schools Association of the Central States](#) (ISACS). This policy incorporates by reference the [Illinois Educator Code of Ethics](#).<sup>†</sup>

### ***Required training and awareness***

All Lab employees must do the following:

- Complete the [University of Chicago Protecting Youth training](#) every three years or as required by law and University policies.
- Review and be familiar with the University guidelines for protecting minors on campus: [Safety of Children in University Programs](#).
- Comply with the reporting requirements under the Abused and Neglected Child Reporting Act.<sup>†</sup>
- Comply with the University [Reporting of Child Abuse Policy and FAQs for Staff and Volunteers](#).
- Complete Title IX training annually or as required by law or Lab and University policies.
- Comply with the University [Policy on Harassment, Discrimination, and Sexual Misconduct](#) and the [Policy on Title IX Sexual Harassment](#), including the reporting obligations under those policies.<sup>†</sup>
- Demonstrate conduct that is aligned with the [Illinois Educator Code of Ethics](#)<sup>†</sup> and conduct that follows generally recognized professional standards.

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<sup>1</sup> This policy is written to comply with Faith's Law (under 105 ILCS 5/22-85.5). Terms that are required by Faith's Law are denoted by a † symbol.

***Prohibited Conduct***

Lab employees must maintain professional and appropriate boundaries and relationships with all students at all times, including with students who are 18 years of age or older.<sup>†</sup> The Schools strictly prohibit the following conduct by employees with or towards students:

- Sexual contact or molestation;
- Sexual, romantic, or intimate behavior, advances, requests, or relationships;
- Dating or asking to date;
- Interacting with students as if they were peers or friends, e.g., sharing personal issues or adult relationship issues with a student, engaging in private correspondence, asking a student to keep a secret, telling a student you will keep information they share secret or confidential, or taking on the role of a “confidante”;
- Adding or “friending” students on social media and networking sites;
- Favoring certain students by giving them gifts, special privileges, or meetings;
- Meeting or inviting a student to meet for a purpose outside the scope of the employee’s professional role, outside of normal instructional hours, off-campus and/or without the parent/guardian’s knowledge and/or permission;<sup>†</sup>
- Using inappropriate language, telling risqué jokes, or making sexually suggestive comments around a student, even if a student initiates or seems to welcome such behavior;<sup>†</sup>
- Commenting on a student’s physical attributes or excessively flattering a student;
- Taking or using images or recordings during Lab programs of any student for personal purposes, or posting on personal social media or otherwise sharing images/recordings of students for non-educational purposes;<sup>†</sup>
- Possessing, producing, accessing, or making available to a student any sexually explicit image, material or media;<sup>†</sup>
- Transporting a student in a personal or school vehicle alone and/or without appropriate permission, or allowing a student to operate, use, or sit in while parked a vehicle belonging to the school or an employee;<sup>†</sup>
- Furnishing to any student or allowing a student to use tobacco, alcohol, cannabis, or any illegal or unauthorized substance, including e-cigarettes;
- Using or possessing alcohol, tobacco, cannabis, or illegal substances, or abuse of prescription or over the counter medications, in the presence or vicinity of students on campus or during school programs or activities;
- Behavior that places a student in reasonable fear of harm to their person or property, or which causes a substantially detrimental effect on the student’s physical or mental health;
- Committing an act of child abuse, neglect, or cruelty to children;
- Engaging in harassing behavior, including sexual harassment;

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- Any other unlawful or improper interactions, including sexual misconduct, as defined in [105 ILCS 5/22-85.5](#)<sup>2,†</sup>;

Employees who violate this policy or who fail to report a possible violation of this policy may be subject to disciplinary or corrective action up to and including immediate termination of employment.<sup>†</sup>

### ***Reporting Obligations***

Violations of this policy: Concerns about any such behaviors must be immediately reported according to the obligations outlined in the Faculty and Staff Handbook, on Lab's [Equal Opportunity](#) webpage, and in the University's [Safety of Children in University Programs](#) Policy. Reports may be made to the Director of Schools or Deputy Title IX Coordinator. If the behavior or relationship involves the Director, it must be reported to the Provost. Employees with questions about their reporting obligations or concerns about suspected misconduct should immediately contact their supervisor, Human Resources, Deputy Title IX Coordinator, or Director of Schools. Lab is committed to providing appropriate support and resources to students and families who have experienced conduct that violates this Policy.

Reporting of Known or Suspected Child Abuse or Neglect: All University faculty, other academic appointees, postdoctoral researchers, staff, student employees and volunteers are "mandatory reporters" under the Illinois Abused and Neglected Child Reporting Act. Further information can be found online at [Mandatory Reporting of Child Abuse Policy & FAQs for Staff and Volunteers](#). In short, the University requires all mandated reporters to immediately report to the [Illinois Department of Children and Family Services](#) (IDCFS, 1.800.25.ABUSE) if they have reasonable cause to believe a child known to them in their official capacity may be abused or neglected. In addition, any mandated reporter who makes such a report must promptly notify the Deputy Title IX Coordinator, the Director of Schools, or their immediate supervisor that a report has been made, as well as the underlying circumstances that compelled the report, and memorialize in writing that the report has been made. Substantive educational content may be obtained via IDCFS (<https://mr.dcfstraining.org>).

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<sup>2</sup> Under [105 ILCS 5/22-85.5](#), "sexual misconduct" means any act, including, but not limited to, any verbal, nonverbal, written, or electronic communication or physical activity, by an employee or agent of the school district, charter school, or nonpublic school with direct contact with a student that is directed toward or with a student to establish a romantic or sexual relationship with the student. Such an act includes, but is not limited to, any of the following: (1) A sexual or romantic invitation. (2) Dating or soliciting a date. (3) Engaging in sexualized or romantic dialog. (4) Making sexually suggestive comments that are directed toward or with a student. (5) Self-disclosure or physical exposure of a sexual, romantic, or erotic nature. (6) A sexual, indecent, romantic, or erotic contact with the student.

### ***Maintaining Appropriate Boundaries***

School employees have a duty to care for students and have authority and influence over students; accordingly, interactions between employees and students are inherently imbalanced. Employees violate appropriate student-employee boundaries when they misuse their position of authority over a student in a way that compromises the student's physical or mental health, safety, or general welfare. Further, employees should be mindful that even the *appearance* of improper conduct between an employee and a student can significantly harm the individuals involved or the community. Employees therefore must avoid behaviors that could be misconstrued and maintain appropriate boundaries at all times. Healthy boundaries help students develop productive, trusting, and safe relationships.

Important considerations regarding appropriate boundaries:

- Boundaries can be physical, behavioral, emotional, locational, or situational.
- Boundaries must take into account fundamental differences between adults and minors concerning authority, judgment, emotional maturity, and physical, cognitive and psychosocial development. Every interaction with students should be guided by the inherent vulnerability of minors and the duty of care borne by adults.
- Healthy boundaries are served by the highest standard of personal conduct at all times when interacting with students. Always work and engage with students in an open and transparent manner. Always use discretion and good judgment.
- Repeated violations of employee–student boundaries can indicate the grooming<sup>3</sup> of a student for sexual abuse.
- When in doubt about a potential interaction with a student, ask your supervisor, Deputy Title IX Coordinator, Human Resources, or Director of Schools.

Employees must adhere to the following non-exhaustive guidelines for maintaining appropriate boundaries:

- Be aware of how your actions and intentions might be perceived and could be misinterpreted. Consult with school administrators when you feel uncertain about a situation.

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<sup>3</sup> [720 ILCS 5/11-25](#) states that “A person commits grooming when he or she knowingly uses a computer on-line service, Internet service, local bulletin board service, or any other device capable of electronic data storage or transmission, performs an act in person or by conduct through a third party, or uses written communication to seduce, solicit, lure, or entice, or attempt to seduce, solicit, lure, or entice, a child, a child's guardian, or another person believed by the person to be a child or a child's guardian, to commit any sex offense as defined in Section 2 of the Sex Offender Registration Act, to distribute photographs depicting the sex organs of the child, or to otherwise engage in any unlawful sexual conduct with a child or with another person believed by the person to be a child. As used in this Section, ‘child’ means a person under 17 years of age.”

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- Respect students' boundaries, bodily integrity, personal property, and privacy. Ask a student's permission before touching them or their belongings. Remember that a distressed child may not be able to convey discomfort with your actions.
- Structure program activities to limit being alone with a student. Wherever practicable, have another adult present when you are working with students.
- Wherever possible, meet with students in open, well-illuminated spaces or rooms with an open door or unobstructed window observable by other adults. Situations requiring a high degree of confidentiality or privacy, such as counseling sessions or medical examinations, may require meeting alone with students in closed rooms; in such cases, choose a room with an unobstructed window and appropriately document the meeting.
- Ensure that students are supervised in a developmentally appropriate way. For example, young children should never be left alone, but high school-aged students may wait unsupervised in an office or classroom for a short period of time.
- Ensure that students of all ages are appropriately supervised when working with volunteers.
- Transport students only with prior and specific permission from an appropriate school administrator and according to departmental practices.
- Adhere to Lab's policies and practices around maintaining confidentiality of student records and information.
- Follow the [Laboratory School guidelines for safe and healthy communication with students](#) and families. Refrain from engaging with students for non-academic purposes, including digital communication or social networking. Do not request or require students to share their personal cell phone, email address, or social media information.\*
- Wherever possible, use official means of communication (e.g., UCLS email or Schoology). Copy other adults on messages sent by text or messenger. Do not use personal email accounts or communicate with students through personal social media.\*
- Refrain from transporting a student alone in any vehicle. Do not use personal vehicles for school business if possible. Never allow a student to drive your car or another staff member's car or vehicle, or sit in your or another's vehicle when parked.\*
- Do not invite students to your home.\*

\*Many Lab employees interact with students and families in capacities that are unrelated to their professional responsibilities or the school environment, for example, when acting as parent/guardians or as coaches in non-Lab affiliated athletics programs. The expectations above are not intended to prohibit or limit appropriate interactions with such students or families, provided that the employee acts prudently, with awareness of appropriate boundaries and how their actions and intentions could be misinterpreted. Employees should assume that students view them, at all times, as employees. Employees should not develop "friendships" with current students outside of Lab's programs. Follow the above guidelines whenever possible.

### ***Respect for student property***

While student property must adhere to school rules and is subject to search and seizure to maintain a safe learning environment, it is important to respect student property outside of such narrow purposes. Lab employees must observe the following guidelines:

- Never take or intentionally damage a student's personal belongings, except items which must be confiscated in a timely fashion to minimize disruption to the learning environment.
- When confiscation is necessary, whenever possible, the employee should ask the student to give them the item, rather than taking it from the student.
- Searches of students' person or property should be conducted only in accordance with the [Search and Seizure Policy and Procedures](#).

Confiscated belongings should be kept in a safe location and promptly returned to the student and/or parent/guardian whenever possible.

### ***Appropriate and inappropriate physical touching***

It is of paramount importance that employees understand and observe the difference between appropriate and inappropriate physical touching.

The following behaviors are strictly prohibited:

- Abusive conduct of any kind toward, or in the presence of, any student. This includes, without limitation, physical, emotional, and sexual abuse, and neglect. For example, demeaning a student, threatening a student, excessive time-outs, and denying a student access to resources.
- Administering force upon a student for the purpose of discipline (i.e., corporal punishment).
- Touching a student in an inappropriate or illegal manner. This includes kissing a child anywhere on their body, or asking a child to kiss an adult.

Friendly touching is an important aspect of students' social-emotional growth and wellbeing; however, affirmative consent is very important in all cases, and context matters. Therefore, Lab employees must follow the following practices:

- Be attuned to and respectful of any signs that a student is uncomfortable with touching.
- Never assume that physical contact is acceptable to a student, and remember you don't know what the child has experienced at home or elsewhere.
- Communicate to administrators any issues involving a student who seems to convey an unusual need for touching.
- Note that appropriate touching is developmentally-appropriate touching. See the chart below for additional guidance.
  - Actions in the "Typical Behaviors" category are those that involve minimal touching and never involve intimate parts of the body. Most people are

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comfortable with these types of touching and they are unlikely to be perceived as inappropriate.

- The “Use Care” category refers to actions that are more sustained and/or involve more sensitive parts of the body, like a student’s lower back or legs. These actions may be an important part of instruction or support for a student, but, in some circumstances, may be inappropriate or abusive. School adults should take care to ensure that these actions occur only in open spaces where another adult is present and that the student does not feel pressured or coerced to consent to them.
- Actions in the “Not Permitted” category are never acceptable, even when initiated by the student.

	Typical Behaviors	Use Care	Not Permitted
<b>Nursery - Second Grade</b>	<p>Typical social/ conversational touch, such as a tap or touch on the shoulder or arm, pat on the back</p> <p>Greetings - Handshake, high-fives, fist bumps, elbow bumps</p> <p>Holding hand or wrist while walking or guiding a student, with the student’s consent and without pulling</p> <p>Brief hugs (adult may offer a hug, but should not request or demand one, e.g., asking “Would you like a hug?” is okay, but telling a student “Give me a hug,” is not okay.)</p> <p>Manipulating a student’s hands or arms as part of instruction after asking the student’s permission, e.g., guiding their hand to write or paint</p> <p>Assisting or guiding a student with a mobility impairment, consistent with their support</p>	<p>Sitting on Laps (particularly as part of a support plan for a child)</p> <p>Touching knees or legs (e.g., tapping a child’s knee or leg to get their attention during circle time)</p> <p>Picking up or carrying a child (generally avoid, but may be appropriate in some situations, like when a child has tripped or a student with a mobility impairment needs assistance)</p> <p>Manipulating a student’s body as part of instruction, after asking the student’s permission, e.g., during dance or athletics</p>	<p>Kissing, anywhere on the body, including cheeks</p> <p>Touching a student’s thigh, buttocks, genitals, either with hand or object, unless assisting a child to clean themselves after an accident or similar</p> <p>Rubbing or pressing your genitals on any part of a student’s body</p> <p>Tickling</p>



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	plan or accommodations		
<b>Lower School</b>	<p>Typical social /conversational touching, such as a tap or touching on the shoulder or arm, pat on the back</p> <p>Greetings - Handshake, high-fives, fist bumps, elbow bumps</p> <p>Holding hand or wrist while walking or guiding a student, with the student's consent and without pulling</p> <p>Brief hugs (initiated by student; side hugs are best)</p> <p>Assisting or guiding a student with a mobility impairment, consistent with their support plan or accommodations</p>	<p>Offering a hug as consolation</p> <p>Manipulating a student's movement as part of instruction, after asking the student's permission, e.g., guiding their hand to paint or write</p> <p>Supporting a student during physical activity, after asking the student's permission, e.g., during weight lifting</p> <p>Picking up or carrying a child (generally avoid, but may be appropriate in some situations, like when a child has tripped or a student with a mobility impairment needs assistance)</p>	<p>Kissing, anywhere on the body, including cheeks</p> <p>Touching legs, buttocks, genitals, chest, lower back or stomach, either with hand or object</p> <p>Sitting on laps</p> <p>Lingering touch, like massages or tickling</p> <p>Rubbing or pressing your genitals on any part of a student's body</p>
<b>Middle and High School</b>	<p>Typical social /conversational touch, such as a tap or touch on the shoulder or arm, pat on the back</p> <p>Greetings - Handshake, high-fives, fist bumps, elbow bumps</p> <p>Assisting or guiding a student with a mobility impairment, consistent with their support plan</p>	<p>Brief hugs (initiated by student; side hugs are best)</p> <p>Manipulating a student's movement as part of instruction, after asking the student's permission, e.g., guiding their hands during ceramics or correcting a tennis swing</p>	<p>Kissing, anywhere on the body, including cheeks</p> <p>Touching thigh, buttocks, genitals, chest, lower back or stomach, either with hand or object</p> <p>Sitting on laps</p> <p>Lifting/picking up a</p>



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		Supporting a student during physical activity after informing the student what you will be doing and why, e.g., during weight lifting	student  Lingering touch, like massages or tickling  Holding hands  Rubbing or pressing your genitals on any part of a student's body  Offering a hug
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### ***Notification to Parents/Guardians in Sexual Misconduct Matters***

If the School receives a report that an employee, agent of the school, or contractor engaged in sexual misconduct, as defined in [105 ILCS 5/22-85.5](#), toward a minor student, a school administrator will promptly notify the student's parent/guardian(s) about the report. However, before the school notifies the student's parent/guardian(s), the school will notify in a developmentally appropriate manner the student that the school will be contacting their parent/guardian(s). The school will tell the student what information will be given to their parent/guardian(s), information about support resources at and outside of Lab and the University, and the name and contact information for the Deputy Title IX Coordinator, who also serves as the Domestic and Sexual Violence and Parenting Resource Coordinator at Lab. The School will not notify the student before notifying the student's parent/guardian(s) in circumstances where a school employee deems it necessary to address an imminent risk of serious physical injury or death of a student or another person, including the victim. If prior notification to the student is not given, notification to the student shall be provided as soon as practicable and without delay following the notification to the student's parents or guardians.

Written notice to the parent/guardian(s) will be provided after notice to the student and will include (1) a description of the alleged misconduct; (2) support resources at and outside of Lab, including available counseling resources; and (3) the name and contact information for the Deputy Title IX Coordinator; and (4) information about the steps that the School will take in response to the report, and the polic(ies) that will apply.

Following an investigation of sexual misconduct, the student and student's parent/guardian(s) shall also be notified when any formal action has been taken by the School relating to the employment of the alleged perpetrator, including whether employment was terminated or whether the School accepted the resignation of the employee. Before the school notifies the student's parent/guardian(s), the school will notify in a developmentally appropriate manner the student that the school will be contacting their parent/guardian(s).

The school's timeframe for providing notice to the family shall take into account whether the matter is being investigated by IDCFS or law enforcement, under which circumstances delays in

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providing notice may be warranted or required. If the affected student is no longer enrolled at the time the report is received, Lab will try to contact them using their last known address or other contact information.