

Hawkeye Area Community Action Program, Inc.	Policy # 256
Safe Space Designations in HACAP's Early Childhood Program Service Areas	Page 1 of 1
	Effective: September 26, 2019
APPROVED BY: HACAP Board of Directors	Revised: January 25, 2025

Policy Statement

Nationally, well known and licensed early childhood programs including Head Start are classified as **sensitive locations**. This designation prohibits Immigration and Customs Enforcement and Customs and Border Protection from conducting enforcement actions on property where Head Start is operated. HACAP will designate areas where it operates Head Start and Early Head Start classrooms as Safe Space areas, to ensure that the program is reliable and accessible to every child whose family seeks our services.

Standard Operating Procedure

In a 2011 Memorandum, ICE declared that its policy is generally not to conduct enforcement actions at spaces they have determined to be “sensitive locations” which includes preschools, child care facilities, and bus stops. This means that ICE should not conduct arrests, interviews, searches or surveillance at Head Start Centers unless exigent circumstances exist, or prior approval is sought from the organization. Even if prior approval is obtained, a warrant is required. Exigent circumstances include threats to national security, terrorism, public safety, or an ongoing criminal case.

If a representative from ICE comes to a site, inform them that it is HACAP's policy to contact our lawyer. Immediately contact the CEO, COO, or CFO, who are the authorized individuals to speak to ICE representatives. The ICE representative should remain in a public area of the facility. Employees should not give any statements to ICE representatives or allow themselves to be interrogated unless directed by HACAP's lawyer.

Further guidance or next steps will be provided to employees after authorized individuals have spoken to HACAP's lawyer.

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Process Manager

This policy was written by the Human Resource Department for use by all HACAP operations. Questions regarding this policy should be directed to the Human Resources Department at 319-393-7811.