

Know Your Rights: CPC Staff Guide

Employee Rights and Protocol During Immigration Enforcement

Updated on January 24, 2025. Subject matter covered in this guideline remains subject to change or elaboration. CPC will periodically update this guideline as warranted. CPC and all affiliates remain nonpartisan and nonpolitical organizations. The sole purpose of this guideline is to enable all staff, community members, and persons on CPC premises or in CPC programs to know and be able to exercise their legal rights under federal, state, and city law.

Basic Rights

- You have the legal right to remain silent
- You have the right to speak with an attorney
- You have the right to refuse signing documents without General Counsel
- You have the right to refuse showing identity documents stating country of origin
- You have the right to refuse answering questions about immigration status
- You have the right to record the interaction (be sure to do so safely)

Organization Rights and Responsibilities

- Right to refuse entry to private areas without a judicial warrant
- Right to require judicial warrant signed by judge verification
- Right to request an attorney present during enforcement actions
- Right to document (notes, videos, pictures) the enforcement action
- Right to refuse consent to searches without a judicial warrant or subpoena signed by a judge
- Right to object to scope of warrant exceeding limitations
- Must not obstruct ICE agents with valid warrants
- Must protect employee confidentiality
- Must not disclose anyone's immigration status [unless required by valid warrant with General Counsel approval]

Staff/Volunteer Actions During Enforcement

- Remain calm and do not run, be polite and courteous
- Say ***"I am not authorized to provide any information, you must contact our General Counsel. Company policy requires speaking to our lawyer"***
- If pressured to respond, follow up by saying clearly: ***"I am exercising my right to remain silent. I am not authorized to provide any information, you must contact our General Counsel. Company policy requires speaking to our lawyer"***
- Do not sign any documents without General Counsel present
- Do not provide false information or documents or make any false statements
- Do not consent to searches of personal belongings [unless a warrant clearly identifies or includes such belongs]
- Document names, badge numbers, and agency of officers if safe to do so

ICE Raid Response Protocols

For CPC Front Line Staff: Steps to Follow if ICE Enters Your Program Site

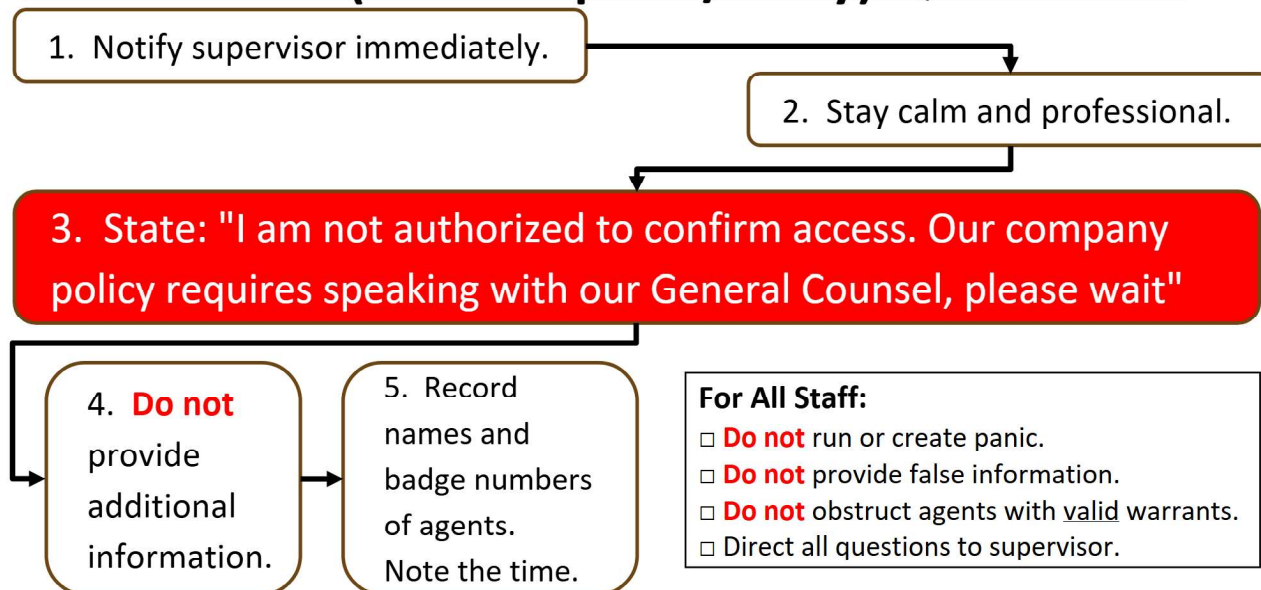
For any suspected ICE presence, the following people must **ALL** be notified

- 1) General Counsel
- 2) Program Director and Chief Program Officer
- 3) City or State contracting agency, if relevant

For CPC Front Desk/Reception/Front Line Staff/Volunteers

- **Do NOT approve or confirm access.** Immediately notify designated incident coordinator/Supervisor, and if possible Program Director and General Counsel
- Say: **"I am not authorized to confirm access. Our company policy requires speaking with our General Counsel, please wait."**
- Do not provide any additional information
- Document time of entry and officer information

If ICE Arrives (For Reception/Entry) Quick Guide



ICE Raid Response Protocols

For CPC Supervisors/Managers/Incident Coordinator: Steps to Follow if ICE Enters Your Program Site

For any suspected ICE presence, the following people must **ALL** be notified

- 1) General Counsel
- 2) Program Director and Chief Program Officer
- 3) City or State contracting agency, if relevant

For Supervisors/Managers/Incident Coordinator

- **Do NOT approve or confirm access. Immediately call Program Director, CPC Chief Program Officer, and General Counsel.**
- **Say: "I am not authorized to confirm access. Our company policy requires speaking with our General Counsel, please wait."**
- Verify information and warrant if presented
 - Officer's name and badge number
Phone number of officer's supervisor
 - Purpose of visit
 - Copies of warrant or documentation
 - ICE agents must present a valid judicial warrant to enter or access information.
 - Be signed by a judge
 - Include the correct address to be searched
 - List specific areas that can be searched
 - Be dated within the last 14 days
- Without a warrant of any kind: Politely and firmly say **"You are not authorized to enter without a warrant, you may contact the General Counsel for CPC or relevant City or State Agency."** If you are not comfortable doing this, tell them to wait for the Program Director.
- If the warrant does not appear valid, politely and firmly say, **"I am not authorized to confirm access. Our company policy requires speaking with our General Counsel, please wait."**
- If warrant is valid, wait for Program Director/General Counsel. Say **"I am not authorized to confirm access. Our company policy requires speaking with our General Counsel, please wait."**

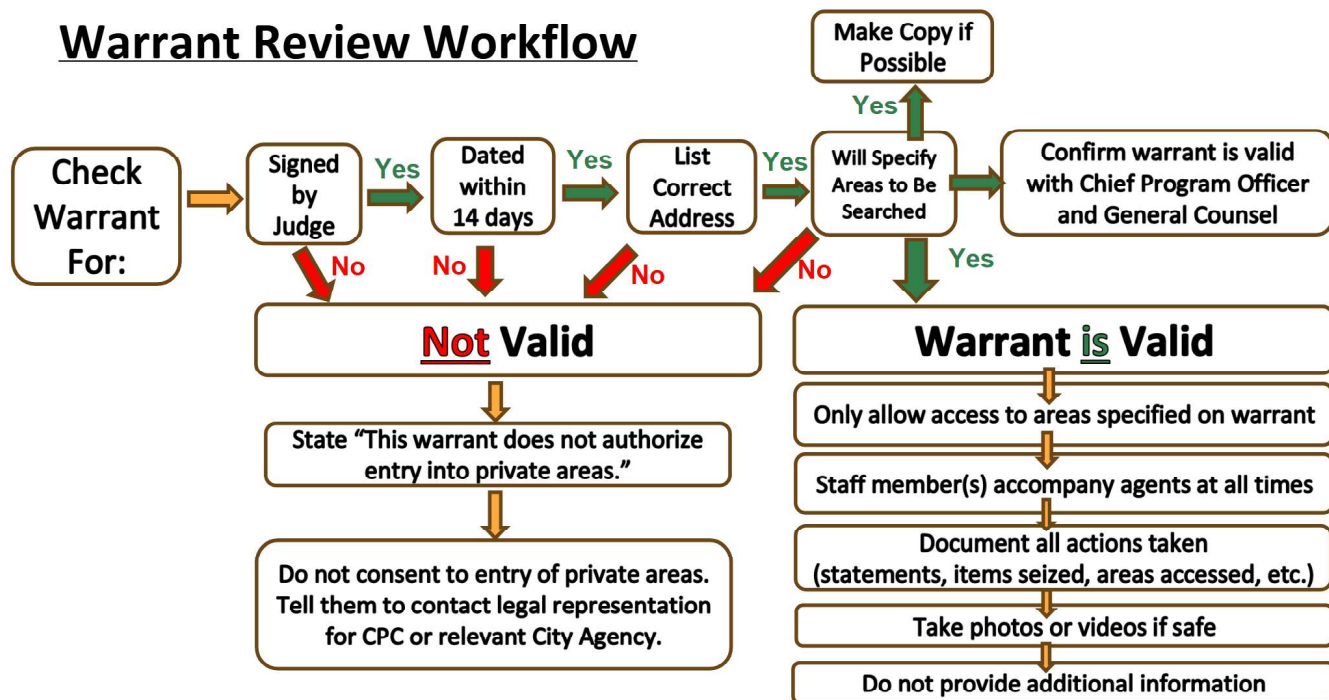
If ICE Interaction Occurs Off Site:

- Follow the same protocol as above: immediately notify Program Director/General Counsel
- Say **"I am not authorized to provide any information, you must contact our General Counsel. Our company policy requires speaking to our lawyer."**
- Remind community members **"You have the legal right to remain silent, you have the right to contact a lawyer."** Do NOT tell them what to do, for example "you should remain silent" which could be considered obstruction of justice.

ICE Raid Response Protocols

For CPC Supervisors/Managers/Incident Coordinator: Steps to Follow if ICE Enters Your Program Site

Warrant Review Workflow



Follow-up

Complete detailed incident report:	Support Actions:
<ul style="list-style-type: none"> <input type="checkbox"/> Date and time of entry/exit <input type="checkbox"/> Names of all agents involved <input type="checkbox"/> Areas searched <input type="checkbox"/> Items/documents seized <input type="checkbox"/> Individuals questioned <input type="checkbox"/> Witness accounts <input type="checkbox"/> Any force used <input type="checkbox"/> Rights violations 	<ul style="list-style-type: none"> <input type="checkbox"/> Contact families of affected individuals <input type="checkbox"/> Notify emergency contacts <input type="checkbox"/> Contact legal support organizations <input type="checkbox"/> Arrange for legal representation <input type="checkbox"/> Document all individuals detained <input type="checkbox"/> Secure personal belongings <input type="checkbox"/> Obtain copies of any documents taken

ICE Raid Response Protocols

For CPC Program Directors/Leadership Team: Steps to Follow if ICE Enters Your Program Site

- Do NOT confirm access. Immediately call CPC Chief Program Officer/Director of Program and General Counsel**
- Notify Contracting Agency Program Manager if relevant, and follow guidance as provided**
- Verify information and warrant if presented (same as workflow above)
 - Officer's name and badge number
 - Phone number of officer's supervisor
 - Purpose of visit
 - Copies of warrant or documentation
 - ICE agents must present a valid judicial warrant to enter or access information.
 - Be signed by a judge
 - Include the correct address to be searched
 - List specific areas that can be searched
 - Be dated within the last 14 days
- If warrant is valid, **AND** General Counsel has confirmed:
 - Accompany agents at all times
 - Do not confirm access to areas that are not listed on the warrant. Say ***"I am not authorized to confirm access to areas not on the warrant, you must contact our General Counsel."***
 - Document all areas accessed
 - Record all items seized
 - Note any statements made by agents
 - If agents ask any information about an individual (for example where they are or if we know them), say ***"I am not authorized to provide any information, you must contact our General Counsel."***
 - If agents request access to records or documents regarding staff or community members, inform the agent that the General Counsel handles all requests for documentation or records and say ***"I am not authorized to provide any information, you must contact our General Counsel."***

ICE Raid Response CPC Protocols: Check List Version

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Key phrase: *"I am not authorized to confirm access/provide information. Our company policy requires speaking to our General Counsel, please wait."*

For any ICE presence, the following people must **ALL** be notified

- 1) General Counsel
- 2) Program Director and Chief Program Officer
- 3) City or State contracting agency, if relevant

For All CPC Staff

- Remain calm and professional
- Ensure your physical safety
- Do not run or create panic
- Do not provide false information
- Do not confirm access
- Do not answer questions
- Exercise right to remain silent
- Document observations if safe
- Create an incident report after the interaction

If ICE Arrives at CPC Reception/Entry:

- Stay calm and professional, ensure your physical safety
- Notify Supervisor and Designated incident Coordinator immediately
- Contact Program Director, Chief Program Officer, and General Counsel
- Say ***"I am not authorized to confirm access. Our company policy requires speaking with our General Counsel, please wait."***
- Do not provide any additional information. Say ***"I am not authorized to provide any information, you must contact our General Counsel."***
- Record names and badge numbers of agents and time of entry
- Do not run or create panic
- Do not answer questions or provide false information
- Do not obstruct agents with valid warrants
- Direct all questions to designated coordinator/supervisor

For CPC Response Coordinator/Supervisor

- Stay calm and professional, ensure your physical safety
- Contact Program Director, Chief Program Officer, and General Counsel
- Say **"I am not authorized to confirm access. Our company policy requires speaking with our General Counsel, please wait."**
- Do not provide any additional information. Say **"I am not authorized to provide any information, you must contact our General Counsel."**
- Verify any warrant presented and make a copy if possible :
 - Must be signed by a judge (not just ICE agent)
 - Must list correct address
 - Must specify areas to be searched
 - Must be dated within last 14 days
- Without warrant of any kind, say: **"You are not authorized to enter without a warrant, you may contact the General Counsel for CPC or relevant City or State Agency."** If you are not comfortable doing this, tell them to wait for the Program Director.
- If only administrative warrant/ judicial warrant not valid, say: **"I am not authorized to confirm access. Our company policy requires speaking with our General Counsel, please wait."**
- If warrant is valid, wait for Program Director/General Counsel. Say **"I am not authorized to confirm access. Our company policy requires speaking with our General Counsel, please wait."**
- Do not consent to entry of private areas

If Valid Judicial Warrant AND General Counsel Confirms:

- Accompany agents at all times
- Do not confirm access to areas that are not listed on the warrant. Say **"I am not authorized to confirm access to an area not on the warrant, you must contact our General Counsel"**
- Document all areas accessed
- Record all items seized
- Note any statements or actions made by agents
- If agents ask any information about an individual or documents, say **"I am not authorized to provide any information, you must contact our General Counsel"**
- Document with video/photo or in writing (ensure your personal safety):
 - Number of agents
 - Names/badge numbers
 - Areas searched
 - Items seized
 - Statements made

For Community Member/Employee Protection:

- Remind individuals of right to remain silent, but do not tell them what to do
- Do not answer any questions about yourself or someone else
- Do not sign any documents
- Request attorney if detained
- Do not volunteer immigration status
- Keep emergency contact info handy

Follow-Up Documentation Actions:

Complete a detailed incident report with the following information

- Date and time of entry/exit
- Names of all agents involved
- Areas searched
- Items/documents seized
- Individuals questioned
- Witness accounts
- Any force used
- Rights violations

Follow-Up Support Actions:

- Contact families of affected individuals
- Notify emergency contacts
- Contact legal support organizations
- Arrange for legal representation
- Document all individuals detained
- Secure personal belongings
- Obtain copies of any documents taken

Sources for this guidance include:

[New York Lawyers for the Public Interest: Immigration Enforcement Guidance](#)
[NYC Mayor's Office of Immigrant Affairs](#)
[Immigrant Defense Project: Know Your Rights](#)
[New York State Office of the Attorney General](#)