ST. LUKE'S LUTHERAN CHURCH 2011 10th Street South Wisconsin Rapids, WI 54494

POLICIES & PROCEDURES CONCERNING

CHILD PROTECTION

AND

RISK MANAGEMENT

COMMUNITY RESOURCE LIST FOR ABUSE OR DOMESTIC VIOLENCE VICTIMS

General note: Call the Social Services agency in the county where the child/youth lives;

Call the police, if warranted, in the city/county where crime occurred.

Call 911 if child is in imminent danger.

Law Enforcement Agencies:

Wisconsin Rapids Police Department	715-423-4444
Wood County Sheriff's Department – Wisconsin Rapids	715-421-8700
Grand Rapids Police Department	715-421-8700
Nekoosa Police Department	715-421-8700
Port Edwards Police Department	715-887-3030
Portage County Sheriff's Department	715-346-1400

Child Protective Service Agencies:

Wood County Human Services* 715-421-8600 (South)

715-387-6374 (North)

Portage County 715-345-5350

CALL 911 FOR ALL EMERGENCIES

*Please Note:

Child Protective Service Agencies are referred to by different names in different counties. In the following document in each case where the term Department of Social Services is used it can be interchanged with the term Department of Human Services as deemed by the county.

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Risk Management - PART 1

Policy Statement

We at St. Luke's dedicate ourselves to grow in faith and love, to serve together, and to reach out with the Gospel of Jesus Christ. In keeping with that purpose, this policy seeks to assure that St. Luke's Lutheran Church is continually working toward providing an environment safe for those participating in, receiving and providing its ministries.

Understanding the Need for a Policy

"While the issue of physical and sexual abuse is not a new topic, it is rapidly becoming the number one concern for organizations responsible for the care and safety of children. Almost every day we are confronted by stories in the media relating instances of actual and alleged abuse against children while in their own home, foster care or when they are in the care of boys and girls organizations, sports associations, day cares, schools, camps and churches.

Apart from the obvious emotional and physical damage caused by such acts, many organizations are now facing the staggering financial costs resulting from civil liability judgments awarded to injured parties who are able to establish negligence against organizations due to the criminal actions of their employees or volunteers. One positive result of these highly publicized liability awards has been the heightened awareness on the part of organizations to take pro-active measures to reduce the risk of abuse to children in their care, including the proper screening, training, and supervision of those individuals working with children and young people."

Although our focus for this policy is directed mainly for children, we realize that abuse may occur against adults as well. At St. Luke's we want to be able to equip our congregation with education, resources and services that will aid in the prevention of all types of abuse.

This policy shall apply to all current and future workers, compensated and/or volunteer, who will have the responsibility of supervising the activities of preschoolers, children, youth, or those with special needs.

Understanding Abuse

Prevention of abuse requires measures to ensure that power is used properly, human dignity is regarded, trust is not betrayed and relationships have integrity.

Some general definitions of abuse include:

- 1. "Abuse is defined as a non-accidental physical or mental injury or mistreatment caused by the acts or omissions of parents or caregivers."
- 2. "Abuse is categorized as physical, emotional, verbal or sexual."
 - a. **Physical abuse** means any physical force or action, which results in non-accidental injury to a child, and exceeds that which could be considered reasonable discipline.
 - b. **Emotional abuse** is the failure to provide the praise, love, nurturing and security essential to the psychological and social development of a child. This neglect is likely to produce long-term serious emotional disorders.

- c. **Verbal abuse** is difficult to specify due to the ongoing nature of intimidation and manipulation. It destroys an individual's self-worth and esteem.
- d. **Sexual abuse** means any sexual exploitation of a child, whether consensual or not, which includes touching, intercourse or any behavior of a sexual nature toward a child. Sexual abuse can also include exposing a child to harmful material or harmful description or narration. In determining whether behavior is of a sexual nature, one should ask whether a reasonable observer, looking at the behavior in its context, would conclude that it is. This would exclude normal affectionate behavior towards children and normal health or hygiene care.
- 3. "Neglect means the failure of those responsible for the care of the child to meet the physical, emotional, or medical needs of a child to an extent that the child's health, development or safety is endangered."

4. **Reporting Abuse**

- Any person who knows or has reason to believe a minor is being or has been neglected or physically or sexually abused may voluntarily report the abuse to the Department of Social Services, the police department, or the county sheriff's department
- A professional or professional's delegate who is engaged in the practice of the healing arts, social services, hospital administration, psychological or psychiatric treatment, child care, educational, or law enforcement is mandated by law to report the abuse
- A person mandated to report physical or sexual abuse or neglect of a minor occurring within a licensed facility shall report the information to the agency responsible for licensing the facility.
- O The Department of Social Services shall, within 60 days after it receives a report from a mandated reporter, inform the reporter what action, if any, was taken to protect the health and welfare of the child or unborn child who is the subject of the report.

Understanding the Church's Responsibility

In the church, we recognize that we are a reflection of God's love to those in our care and we take our responsibility to them seriously. The Scriptures say:

- 1. "People were bringing little children to Jesus to have him touch them, but the disciples rebuked them. When Jesus saw this, he was indignant. He said to them, 'Let the little children come to me, and do not hinder them, for the kingdom of God belongs to such as these. I tell you the truth, anyone who will not receive the kingdom of God like a little child will never enter it'. And he took the children in his arms, put his hands on them and blessed them." (Mark 10:13-16 NIV)
- 2. "Avoid every kind of evil." (1 Thessalonians 5:22 NIV)
- 3. "But among you there must not be even a hint of sexual immorality...because these are improper for God's holy people." (Ephesians 5:3 NIV)

4. "But whoever causes one of these little ones who believe in me to stumble, it is better for him that a heavy millstone be hung around his neck and that he be drowned in the depth of the sea." (Matthew 18:6 NAS)

Therefore, these guidelines are set forth to provide a safe and nurturing environment in which we can bring our children and youth to the Savior. We view ourselves as partners with parents, seeking to provide quality care and instruction in our ministry to the family. Our guidelines are designed to protect every age level and to promote spiritual growth. These guidelines extend also to members hosting small group church related activities within their homes or other locations in which child care is provided.

This plan is designed to assist church leaders in their recruitment of workers and, to the greatest extent possible, provide for the safety of those served by these volunteers.

Screening Procedures for Volunteers and Staff

The impetus for congregations to develop screening policies comes from a variety of sources. First, having a screening policy in place tells church members that the church is serious about preventing abuse and reducing volunteer/staff liability to claims of abuse. In addition, screening policies may help reduce the incidence of child abuse within church programs and may reduce a congregation's legal liability. Insurance underwriters and attorneys recommend to churches that they have a written screening policy. Furthermore, various laws may encourage or require screening policies.

The development of a screening policy can have a twofold effect on child abuse prevention. First, church officers who are responsible for assigning volunteers/staff to serve in church programs have more data to help them make an adequate match between a person's interests and skills and the available positions. The data may enable church officials to screen an individual out of a program or position in which the individual may pose a risk to children. Second, in some cases, the fact that a screening policy exists will deter an individual who poses a threat to children and does not want to risk exposure.

No screening policy can guarantee the prevention of abuse. As with prevention policies, the goals are to reduce the incidence of abuse and to reduce the liability of volunteers/staff.

The most effective screening process for St. Luke's volunteers includes five steps: 1) 6 month membership in the church before involvement of any kind with children; 2) the application form (*Appendix H & I*); 3) a personal interview by a minimum of two unrelated people involved in accountability of applicant; 4) three references; and 5) in some circumstances criminal record checks to obtain broader information about the applicant's criminal record. In specific situations an on-line sex offender check or motor vehicle record check could possibly be asked for. The template in *Appendix C* shows which steps apply to specific ministry positions within St. Luke's. Volunteers will be screened every three years, or as needed (for example: when a situation arises indicating screening should be redone).

Exception for Non-Member Volunteers

On occasional situations this policy will allow for people outside the St. Luke's membership to volunteer in youth related programs, activities or events if they meet the following criteria:

- 1. He/she is a member in good standing of a Christian church and has been a member of that church for at least 1 full year.
- 2. He/she completes the St. Luke's Volunteer application, providing 3 references and allowing for background screening.

- 3. He/she fulfill s the annual risk management training requirement of all St. Luke's volunteers
- 4. He/she provides a letter of recommendation from his/her current pastor which provides the date he/she joined the church, current involvements and what screening, if any, that church has done on the individual, as well as character reference.
- 5. All 3 references provided will be contacted by a member of the St. Luke's Screening Team.
- 6. The background screening process indicates a completely clear record.

The St. Luke's member(s) responsible for the specific program or ministry will assure that the non-member volunteer only acts as an assistant to other member volunteers and is never assigned a position of responsibility to work alone with youth or children. A non-member volunteer who has membership in a church other than Lutheran Church – Missouri Synod is not permitted to teach or educate on Biblical or doctrinal matters at any time.

Procedures for Reporting Instances of Abuse or Suspected Abuse

A. 1. Obligation to Report – (*Legal Guidelines*)

Any person who has reasonable grounds to believe that a child is in need of protection should report the matter to a social worker in the local office of the Department of Social Services or to the Police. Should you have questions regarding the specific incident you are facing, an anonymous call can be placed to the Department of Social Services or to the Police to clarify whether or not this situation constitutes a reportable offense.

Social workers who receive reports are trained to assess and investigate the need for intervention. Church professionals must not assume this function. Any church professional who does so and fails to report may commit an offense under local laws. The Child Protection Act protects an individual when a report is made. No action will be taken against a person making a report unless it is made maliciously or without reasonable grounds for the belief.

Abuse or neglect need not have already occurred for a child or youth to be in need of protection; it is not necessary to wait until a child has been harmed to intervene. When abuse or neglect can be reasonably anticipated and there are reasonable grounds to believe a child or youth is in need of protection, the legal obligation for a professional to report applies.

Historical abuse or neglect, that is, abuse or neglect which occurred in the not very recent past, should be reported wherever there are reasonable grounds to believe a child or youth is in need or protection. If the alleged offender is in regular contact with a child or children, irrespective of whether it is the same child or children abused in the past, there may well be grounds to believe that the child or children are at risk based on the offender's past behavior. It is particularly vital to report these cases where the alleged abuser is in a position of trust.

2. Who Must Report

St. Luke's Policy is that all volunteers and paid staff who are involved in ministry to children or youth will immediately communicate any items of concern to the ministry leader and/or pastor/DCE. Reports may also be made by contacting the Department of Social Services or the Police directly.

3. Reporting Procedure

For any case of suspected abuse, it is helpful to fill out the Suspected Abuse Report Form, *Appendix E*, and give it to your ministry leader, pastor or DCE. It is highly recommended that you also discuss the situation in person with these individuals. They

will act as point of coordination with the Department of Social Services or the Police if a report needs to be filed with them and they will advise you in regard to any information you may be required to provide.

It is not the responsibility of the ministry leader or pastor/DCE to serve as an investigative body, but rather they shall only gather and clarify information pertinent to the reported incident. The ministry leader and/or pastor/DCE will utilize the following guidelines in determining whether the suspected abuse should be reported to the Department of Social Services or the Police.

If the victim is a child or youth under the age of eighteen, notify the authorities if:

- o The victim is related to abuser and/or living in the same residence.
- The victim is being abused by parents, siblings, or non-related individuals either living in the same home or during custodial arrangements.
- o The victim's safety is at risk, and the parents are not protecting him/her.
- o The victim does not know the abuser
- o The victim is not related to the abuser and does not live with the abuser
- o The victim may have contact with abuser without protection
- The victim is under the authority of the abuser, who may be a baby-sitter, a teacher, choir director and the like.

4. Confidentiality

It is extremely important in these matters to keep information confidential at all times. Any suspicions of abuse should be directed to the ministry leader, pastors/DCE, or to appropriate local authorities.

The only claim of confidentiality that overrides the legal duty to report may be the attorney-client privilege. Therefore physicians, pastors, and others who consider their professional relationships confidential for certain purposes <u>MUST STILL</u> report abuse or neglect.

5. Responding to the Child or Youth

When a victim first comes to you, be sure to take his or her word seriously. Do not deny the problem, but stay calm and listen. Give emotional support, reminding the individual that he or she is not at fault and telling you about the problem was the right thing to do. Do not promise the child you will not tell anyone. *See Appendix B*

6. Responding to the Child's Parent or Guardian

Remain calm. Refer the parent or guardian to the ministry leader and or pastor/DCE involved. *See Appendix B*

B. Protection from Liability

Church personnel should immediately report to the Department of Social Services or the Police any suspected case of abuse. It is not a breach of confidence between church personnel and the individual involved. No person is personally liable for reporting suspected incidents of abuse to the proper authorities if done so in good faith. As church leaders, we are accountable to God to protect His children. Although it is our desire to protect the parents/guardians as much as legally possible from undue interference by outside authorities into their family, the protection of the innocent from abuse is even more important. We want to follow the principles of submitting to

governing authorities (Romans 13:1-5) while at the same time helping parents exercise discipline that is consistent with the Scriptures and in the best interest of the children.

C. Coordination with the Department of Social Services or Police

The church must avoid any undue interference when a report of abuse has been filed with the Department of Social Services or the Police. The church should ask the Department of Social Services how it can assist in helping and supporting the hurting individual and his or her family. The church will maintain frequent and consistent communication and supportive relationships with those suspected or found guilty of abuse as long as these persons exhibit a willingness to listen, change, and look to Christ for help and healing. This does not exclude the need for hurting individuals to receive professional counseling.

GUIDELINES FOR HANDLING ALLEGATIONS OF ABUSE

Philosophy

Realistically no practical prevention strategy is 100 percent effective. An accusation of sexual abuse may occur in any church. Churches are encouraged to develop a premeditated plan or strategy to respond to sexual abuse allegations. The church should not try to navigate a crisis situation without a compass to guide it. Wrong or uninformed actions can multiply the pain and liability inherent in an abuse case. An effective response strategy recognizes the following underlying principles:

- a. All allegations need to be taken seriously.
- b. Situations must be handled forthrightly with respect for people's privacy and confidentiality.
- c. Full cooperation must be given to criminal authorities under the guidelines of our church lawyer.
- d. Adequate care must be shown for the well being of victims.
- e. The victim will not be held responsible in any way.

Abuse Prevention and Screening Team

The Abuse Prevention and Screening Team (APST) will consist of at least three members

- ♦ Parish Administrator
- ♦ Lay Representative or Member-at-Large
- ♦ Member-at-Large

The Parish Administrator would serve in conjunction with the duties of the position.

The Lay Representative, if serving, would serve concurrent with his office tenure.

The Members-at-Large are appointed by the Chairman of the Congregation and approved by Council. Members-at-Large would serve a minimum of two years and may be re-appointed. No more than two members should leave the team in the same year.

The APST shall be responsible for the initial receipt and review of all applications:

- A. For professional staff
 - 1. The chairman of the call committee and parish administrator shall be responsible for implementing the recommended screening steps for all potential professional and called staff.
 - 2. If specific concerns arise, it is their duty to consult with the call committee and make them aware of the concerns before an official call or offer to hire is extended.
- B.. For all applications of employees and volunteers
 - 1. If the initial review indicates anything that may constitute using caution in allowing this person to serve in programs involving children / youth or finances:
 - a. The APST may determine that the concern is sufficient enough to warrant immediate denial of working with children or in finances but encourage individual to serve in other areas
 - b. The APST may wish to conduct the personal interview to clarify specific items on application which are in question.
 - c. The APST may determine that a criminal check is deemed necessary and shall proceed with that process before making final recommendation.
 - 2. If the initial review does not indicate any specific concern that may affect the individual's responsibilities in safely working with children and youth or finances the following steps are followed:

- a. Online Sex Offender/Motor Vehicle Check (only as recommended per Appendix C), will be initiated and processed by the APST and results of those steps clearly documented and kept on file
- b. Upon the request of the ministry leader, provide a copy of the first two pages of application which includes personal information and personal references only the legal portion of the application will be held in the strictest confidence and not made available to anyone outside of the APST.
- c. It is the responsibility of the ministry leader in receipt of the application to perform the personal interview. Ministry leaders may also contact the references before making a final determination of the individual's acceptability. If further counsel is needed, the ministry leader shall discuss the individual's application with the APST or pastor to aid in the decision making.
- d. Applications will be kept on file and updated every year as part of the training process.

The APST shall meet as required and shall ultimately report to the Church Council. The Council will assure that there is an annual review of abuse policies procedures, requirements and implementation.

The APST shall be responsible for the implementations and monitoring of the program including education/training efforts, reporting and tracking.

These policies shall be reviewed at the beginning of each church year by the Risk Management Committee with input from the APST to ensure the church's ministry is conducted in an appropriate manner and to review the policy and make revisions, if necessary.

Receipt of Suspected Instances of Abuse

Any staff member or volunteer of a children, youth or special needs ministry who observes an instance of suspected abuse is to immediately report what he or she has observed verbally to their ministry leader or by written documentation on the provided report form. Appendix D

The ministry leader must insure that a written form (*Appendix D*) is given to the pastor/DCE or Congregation Chairman within 24 hours.

The pastor/DCE or congregation chairman shall proceed with the appropriate action of contacting authorities, etc. If allegations involve minors, suspension of duties involving children and youth should be immediate. This must be done to insure that the alleged perpetrator is not allowed to remain in a position where the abuse could continue or where abuse may be perpetrated against other children in the church. The church cannot wait for what may be a long drawn out investigation by authorities to act.

Required Training for Staff Working with Children, Youth or those Individuals with Special Needs

It is the responsibility of the Abuse Prevention and Screening Team and Risk Management Committee to insure that appropriate training is provided to all church staff members working in any way with children, youth or those having special needs.

The training may be provided by someone with appropriate skills within the congregation or someone with appropriate skills from outside the congregation.

Training should be provided annually probably near the time of the beginning of the church school year and is required for any staff member, paid or volunteer, working in any area of children, youth or special needs ministry.

At a minimum training will include:

- ♦ Importance of Abuse Prevention and Screening Policy
- Specific abuse prevention policies for each specific ministry
- ♦ Suspected abuse reporting
- ♦ Signs and symptoms of child abuse
- Responding to an individual's report of abuse
- Responding to parents/guardians who are notified of an abuse report

All paid and volunteer staff members are required to sign a training documentation form, which is to be kept on file in the church office. (Appendix G)

The Ministry leader assigned to specific children's, youth or special needs programs will monitor compliance with their volunteers and proper documentation to the APST Team Coordinator annually. As new volunteers are recruited throughout the year, updated reports will be provided to the APST as their training is completed.

The APST and Risk Management Committee will supervise all paid staff members and ensure training and orientation is completed.

Guidelines for Salaried Ministerial Personnel in their Interpersonal Relationships

These guidelines are intended for current ministerial personnel including the Pastors, Director of Christian Education (D.C.E.), Pastoral Assistant, Director of Music Ministries (and any additional staff that may be hired). All will be expected to follow these guidelines.

Guiding Principles:

All spiritual leadership and authority is granted by Christ and therefore a sacred trust. It is a foundational principle that spiritual leaders be dedicated to preventing the abuse of authority. Abuse of authority may take the form of non-accidental injury, exploitation of another for sexual gain or gratification (with or without the consent of the other person), intentional degrading of another, failure to provide appropriate supervision of church activities, or control or coercion of another. Abusive behavior diminishes the abused person by weakening their personal power and spiritual life, producing fear, shame and doubt. The abuser achieves an inordinate level of control, power and selfish gratification. Any person who accepts the responsibility of spiritual leadership must exercise that role with humility and love, caring for the dignity of all people, as Christ modeled for us.

Guidelines:

- 1. Establish and commit to clearly defined boundaries in personal relationships.
 - a. Only schedule evening appointments when others are in the building or at the meeting.
 - b. Recognize that meeting alone with an adult congregant in his or her home carries inherent risk. If you visit someone alone at home, consider taking along an elder or a deacon. Be sure the office secretary knows your schedule.

- c. Any meetings with children or adolescents should take place in public and be attended by or approved by the child's parents. Leaders/volunteers are not permitted to transport children alone in their own or any vehicle. If a child needs to be dropped off, a phone call must be made to a parent or guardian requesting permission to bring the child home.
- d. The display of physical affection should be limited to a brief hug or touch to the back or forearm.
- 2. Maintain an accountability relationship with a colleague or peer to ensure proper behavior. Openly discuss any threat to appropriate boundaries. Listen earnestly to any feedback or counsel you receive, particularly if concerns are expressed.
- 3. Deliberately attend to your own spiritual, mental, and physical well-being. Watch out for negativity in your attitude, notice temptation and/or any self-destructive tendencies.
- 4. Be sensitive and honest about your sexuality and needs. Conduct yourself in a moral, responsible way.
- 5. Use your role to promote the spiritual growth and healing of individuals. Make the congregation aware of the reality of the possibility of abuse occurring in the church. Work to promote an awareness and understanding of these issues. Be openly committed to abuse prevention and to properly training church staff and volunteers.
- 6. Be familiar with and adhere to your professional Code of Ethics.
 - a. Know whom to notify (police, child protective services or legal counsel) when abuse allegations occur. Do not investigate on your own.
 - b. Know your community reporting laws. Failure of certain professionals to report child abuse may be a criminal act in Wisconsin.
 - c. Keep accurate and complete records of abuse allegations and subsequent actions taken.
 - d. Keep accurate records of pastoral care sessions. Maintain records in utmost confidence.
 - e. Carefully screen all paid staff or volunteer workers who will have contact with children or youth.

Individual policies are Available upon request:

Attachment I St. Luke's Preschool & 4K
Attachment II St. Luke's Nursery Care
Attachment III St. Luke's Sunday School

Attachment IV St. Luke's Youth

Attachment V Emergency Response Plan

These policies are written to more clearly define what is required and expected of volunteers and paid staff when working in that particular area of ministry.

Risk Management – Part II HARASSMENT POLICY

I. Statement of Policy

St. Luke's Lutheran Church is committed to providing a professional environment that fosters respect and dignity for each person – one characterized by the high Christian ideals given in the New Testament. Our intent is to meet both the biblical and legal mandates and to provide an environment in which to volunteer or work that is free from sexual and/or any other type of harassment. Harassment is unprofessional, unchristian and disrespectful. It is illegal and immoral and contrary to the biblical instruction given by God.

St. Luke's is committed to taking all reasonable measures to prevent such incidents and to deal promptly and fairly with any report of harassment in a confidential, discreet and thorough manner. A charge of harassment shall not, in and of itself, create the presumption of wrongdoing. However, substantiated acts of harassment will result in disciplinary action up to and including dismissal. Individuals found to have made false or frivolous charges will also be subject to disciplinary action.

II. Defining Harassment

Harassment occurs when an individual is subjected to treatment or an environment, which is hostile or intimidating because of the individual's race, creed, color, national origin, physical condition, or gender. Harassment can occur at any time during the course of any church or school related activities. It includes, but is not limited to any or all of the following:

- A. **Verbal Harassment:** Derogatory comments and/or jokes with intent to harass: threatening or obscene words spoken to another; written communication that is intimidating and/or inappropriate for a Christian environment.
- B. *Physical Harassment*: Unwanted physical touching, contact, assault, deliberate impeding or blocking movements or any intimidating interference with normal work or movement.
- C. **Visual Harassment**: Publicly displaying or making obscene gestures with the intent to harass; derogatory, demeaning or inflammatory posters, cartoons, written words or drawings.
- D. **Sexual Harassment**: Sexual Harassment shall consist of unwelcome sexual advances, requests for sexual favors, and other inappropriate verbal or physical conduct of a sexual nature when made by any individual involved with an activity sponsored or related to St. Luke's Lutheran Church and Preschool toward any other person or persons when...
 - a. demands for sexual favors in exchange for employment advantages, promises of employment advantages, or the threat of withdrawal of those advantages;
 - b. displays of sexually suggestive posters, graffiti, or objects;
 - c. unwanted comments about a person's body, sexuality, or sexual conduct
 - d. unwanted flirtation, sexual propositions or advances;
 - e. unwanted touching, pinching, or fondling;

f. sexist jokes, anecdotes, or comments that are insulting, demeaning, or derogatory toward a person because of gender, even when not of an overtly sexual nature (which are either obviously offensive or continue after the speaker is informed that those comments have caused offense.)

Who Does This Policy Cover?

This policy applies to members and persons involved in church related activities and includes all incidents of harassment, which adversely affect congregational working relationships whether they occur in or outside of church related activities. It covers the harassment of clergy, clergy family, church employees, volunteer leaders and members.

We regard our co-workers as dwellings of the Holy Spirit and seek to develop mutual respect for each other as brothers and sisters in Christ. Harassment is contradictory to the desire to "walk by the Spirit" (Galatians 5:16-21) and is damaging to both the victim and the offender. This policy applies to all harassment including that by men (boys) toward women (girls), by women (girls) toward men (boys), between men (boys), and between women (girls). Any person who has been harassed (or who has observed an incident of harassment) by anyone covered by this policy may initiate a complaint under this policy. St. Luke's recognizes that St. Luke's workers and volunteers may be harassed in the course of their work by persons outside the reach of this policy. We will seek to provide whatever support and assistance to the complainant that is required in the circumstances.

Where Does this Policy Apply?

The prohibition against harassment includes conduct on the premises of St. Luke's Church and Preschool, as well as at other locations where St. Luke's activities and work responsibilities are performed. Harassment through indirect methods of communication such as telephone calls, electronic communication, or in writing is also covered by this policy.

III. Responsibilities

- A. It is the responsibility of St. Luke's Lutheran Church and Preschool to:
 - a. Establish proper procedures for filing and investigation of harassment complaints.
 - b. Establish an investigation committee when necessary.
 - c. Make all members of St. Luke's Church & Preschool community aware of this policy and our commitment toward its strict enforcement.
 - d. Remain watchful for conditions that create or may lead to a hostile or offensive environment
 - e. Establish practices designed to create an environment free from discrimination and/or harassment.
- B. It is the responsibility of each member of the St. Luke's Church and Preschool community to:
 - a. Conduct himself or herself in a manner, which contributes to a positive Christian environment.
 - b. Avoid any activity that may be considered discriminatory, intimidating or harassing.
 - c. Consider immediately informing anyone harassing him or her that such behavior is offensive, unwelcome and must be discontinued immediately.

IV. Administrative Procedures

- A. Any person who believes he or she has been subjected to harassment as prohibited by this policy may communicate verbally or by written report (*Appendix L* Harassment Report Form) to a pastor, D.C.E. or Chairman of the Congregation
- B. The pastor, DCE or Chairman of the Congregation shall determine what course of action is required.
- C. At this point, privately speaking with the alleged offender in an attempt to resolve the concern in accordance with Matthew 18 may indeed be the first course of action taken. [15"If your brother sins against you, go and show him his fault, just between the two of you. If he listens to you, you have won your brother over. 16 But if he will not listen, take one or two others along, so that 'every matter may be established by the testimony of two or three witnesses.']
- D. All written and signed allegations brought forward shall be investigated promptly by a committee of two or more established by the Congregation Chairman. The person against whom the allegation is made (or his/her parent or guardian if the alleged harasser is a minor) shall be notified in writing of the allegation(s) and may be provided an opportunity to respond during the course of the investigation. The investigation committee shall document its investigation and shall present a written report to the Congregation Chairman at its conclusion.
- E. Following the investigation and after consultation with the pastor, appropriate action shall be taken as deemed necessary by the Church Council. Action may include, but need not be limited to, the sanctions set forth in Section V.
- F. The complainant and accused (or his/her legal guardian) shall be informed in writing at the conclusion of the investigation that all allegations have been investigated and what actions will be taken. Confidentiality, both of the complainant and the accused, will be respected consistent with the congregation's legal obligations and with the necessity to investigate allegations of misconduct and take appropriate remedial action.
- G. If any party involved is not satisfied with the results of the investigation, they have the right to appeal the decision to the Board of Elders.
- H. Reports of harassment made in good faith shall not reflect adversely upon the complainant's employment status, nor will it affect future employment decisions, work assignments or other terms of employment.
- I. Individuals found to have made false or frivolous charges may be subject to sanctions as deemed necessary by the Church Council.
- J. Appropriate civil or criminal authorities shall be notified of any substantiated complaints when required by law.
- K. If the Church Council has determined that the appropriate remedial action is to discharge an employee, the Church Council shall forward all documentations regarding the incident to the congregation's Board of Elders and pastor(s), including a report explaining why the Council has determined that such a discharge is appropriate. The Board of Elders shall then promptly take such action, as it deems necessary in its discretion.

V. Sanctions

- A. A charge against a St. Luke's member or volunteer which is determined by the Church Council to have merit shall subject the person to disciplinary actions which may include forfeiture of position and/or church discipline consistent with procedures established by the Constitution and By-Laws of St. Luke's Lutheran Church or by the Board of Elders.
- B. A charge against a staff member which is determined by the Church Council to have merit shall subject such person to disciplinary action which may include suspension

without pay or discharge, as determined by the Church Council as appropriate, consistent with the procedures established by the congregation. Staff members may be suspended with pay pending the outcome of the investigation.

- C. A charge against a person under the age of 17, which is determined by the Church Council to have merit, shall subject the youth to disciplinary action.
- D. Since harassment is illegal under both state and federal law, it may also result in criminal and/or civil charges being brought against the alleged harasser.
- E. Individuals found to have made false or frivolous charges may be subject to sanctions as deemed necessary by the Church Council.

VI. Recording of Investigative Materials

The membership file, should the alleged offender be a member of St. Luke's would state that an investigation was made and indicate the final outcome of the investigation. In addition, a confidential file shall be established for every harassment complaint made. It should include:

- 1. The complainant's name, an initialed copy of the complaint as described by the complainant, the names of witnesses and their testimony, and the name of the alleged offender;
- 2. A copy of the Investigative Report and determination of fact and recommend-dations made;
- 3. An indication of the disposition of the complaint, including any appeal process findings and disposition.

VII. Communication of Harassment Policy

A statement of who may be contacted to report harassment will be posted on the congregation bulletin board in the Fellowship Hall. A full copy of the policy prohibiting harassment, which informs people of their right to raise and how to raise the issue of harassment, will be in the church office and will be furnished to any person upon his or her request.

Risk Management – PART III FINANCIAL GUIDELINES

Individuals given responsibilities in handling money shall be a member in good standing for at least six months. They shall be of high integrity and conduct. Persons in financial leadership positions shall follow established guidelines to ensure the ethical and responsible handling of monies within the programs and activities of St. Luke's. Screening of all individuals, volunteers and employees who handle funds will be conducted according to the requirements set forth in the Child Protection and Risk Management Policy, *Appendix C*.

Auxiliary Ministries —the church council has authorized that certain ministries within the congregation maintain their own budgets and bookkeeping procedures. These ministries are able to raise funds and disburse funds, maintain a check book and are required to provide a printed annual report to be included in the congregations annual report publication. Auxiliary ministries are requested to follow the same guidelines as the church at large in money handling procedures.

General guidelines in handling money shall be as follows:

- Two persons shall be signatory on checking accounts.
- Check books shall be kept current.
- Written financial reports shall be prepared monthly and provided to organization.
- ♦ All expenditures should be authorized by another officer of the organization. Purchases should be made through a voucher system to ensure accountability. If anything is purchased with personal funds, a form for reimbursement with attached receipt should be used to obtain reimbursement through the organization.
- Financial accounting books shall be reviewed at least once a year and a report made available to ministry/auxiliary members.
- End of year financial report shall be provided for the church's annual report.
 - ♦ Sunday School and the Ministry on Youth have been requested by the Church Council to provide quarterly financial reports as well as the end of year report.

Receiving monies:

Ushers play key roles in the collection process of money from worship and special services. Therefore, they should be trained how to keep funds safe during and after collection.

- Watch for suspicious, out-of-place individuals and be ready to act should they witness a theft in progress.
- After a collection is taken, they should immediately place the funds in a locked safe or another secure location.
- o Under no circumstances should envelopes be opened by ushers
- In the event that there is a free-will offering taken specifically for a guest presenter or speaker, arrangements will be made ahead of time to have the financial secretary or head teller available after the services to:
 - 1. count the offering with one other volunteer verifying the count,
 - 2. prepare a written statement of the amount received for church records
 - 3. present offering to the guest presenter/speaker

When counting monies:

- Collections should never be taken home.
- Money shall remain in safe until it is to be counted.
- Counting shall be done in a private and secure room.
- Envelopes, cash, and checks should be kept visible at all times

- ♦ There shall always be at least two unrelated persons present when money is counted / recorded / transported / deposited.
- Each time a collection is counted, two unrelated individuals should initial a written form noting the amounts received in checks and cash.
- ♦ Money shall be deposited in official accounts as soon as possible after receipt. A receipt of deposit should be kept with records.
- ♦ A full accounting of receipts and expenses shall be included in monthly financial reporting.

On occasions other than church services in which money is collected (sales, dinners, fundraisers of any kind, donations) the person in charge of the collection shall make sure money is kept in a secure location at church and every effort made to count, deposit and report as soon as possible. There is a lock box drop slot next to the office door where money can be deposited and left overnight. If using the drop slot, please enclose a note as to what the money is for and what is to be done with it.

In the event that receipts need to be taken home from these types of events, it is absolutely essential to count all receipts in the presence of at least one other unrelated person before the money is taken from the building. A slip to verify the amount counted shall be signed and dated by the counters, attached to the final receipt of deposit and kept with financial records.

If an accusation or suspicion is reported, it is important to act promptly and with care. The suspected individual(s) should be confronted and asked to provide a full accounting of the situation. If not already completed, an audit should be performed. If sufficient information or a confession points to guilt, church leaders then need to decide whether to turn the matter over to the police. Church leaders also must remember that they owe a responsibility to the members and donors to be good stewards of the church's resources.

Signs and Symptoms of Child Abuse

Note: Children rarely exhibit just one sign that they are the victims of abuse. Some symptoms may also represent typical developmental changes or the after effect of traumas in their lives other than abuse. Conversely, it is possible for abuse to be taking place without the appearance of noticeable symptoms because of the child's inability or unwillingness to express what would otherwise be very confusing and painful to acknowledge. Generally, several signs observed over a period of time suggest that a child may be suffering from abuse. This highlights the need for training among volunteers, staff and program leaders.

A. Infants and Preschool Children

- 1. Regression to an earlier stage of behavioral development such as baby talk, thumb sucking, or bedwetting.
- 2. Change in social behavior excessive crying or clinging, or becoming aggressive or withdrawn that is not associated with normal developmental stages.
- 3. Physical manifestations such as loss of bowel control, bedwetting, frequent urination, headaches, stomachaches, breathing difficulties, sore throats accompanied by gagging, stains in the child's underclothes.
- 4. Exhibiting signs of fear around a family member or a familiar person, or fear of a familiar place or object.
- 5. Fear of being touched, shying away from physical contact. Resistance to being diapered or assisted in the bathroom.
- 6. Use of explicit language or sexual behavior that is beyond the child's comprehension or life experience.
- 7. Attempting sexual behavior with other children or attending adults.
- 8. Unexplained injuries and/or bruises, repeated injuries blamed on the child's carelessness, multiple bruises sustained in one event, or bruises to child's midsection, back, head, or back or thighs; signs of scalding, burning, or distinctive bruising, such as in the shape of a belt buckle; multiple bruises in various stages of healing.
- 9. Name-calling toward other children, bullying behavior, sulking/brooding.
- 10. Fascination with fires; playing with matches, lighter.

B. School-Age Children

- 1. Physical manifestations as above with addition of complaints of pain, irritation, soreness, redness on the child's bottom; smearing feces on walls or objects.
- 2. Pattern of injuries, multiple injuries, injuries about the face or neck; failure to complain about or explain an obvious physical discomfort.
- 3. Unusual fears: a familiar person, a particular room, a particular object, or fear of new experiences.
- 4. Poor concentration in classroom.
- 5. Exhibiting adult-pleasing behaviors, striving for perfection, acting miserable if failing.
- 6. Engaging in self-injury; engaging in excessive masturbation or masturbation in public setting.
- 7. Acting enraged and out of control; expressing anger through destruction.
- 8. Shyness about physical touch.
- 9. Exhibiting sexual behavior beyond comprehension or maturity level; behaving in sexual manner with other children or adults.

- 10. Exhibiting signs of needing to be in control of others or situations, bullying others.
- 11. Hostility and distrust of adults, mood swings and irritability, violent disruptions.
- 12. Acting out, including hoarding food and toys, lying, stealing, assaulting.
- 13. Frequent absences from school or other scheduled events either because of being punished or to hide bruises.
- 14. Low self-esteem, particular sensitivity to criticism.
- 15. Hyper-vigilance excessive and suspicious watching of other people; easily startled.
- 16. Preoccupation with fire and setting fires.

C. Adolescents

- 1. Eating disorders, use of laxatives, unexplained and dramatic changes in weight.
- 2. Change in sleep patterns, including excessive sleeping, sleeping during the day and insomnia.
- 3. Performance in school significantly declines
- 4. Perfectionist behavior, excessive self-criticism, attempting to please adults, overreacting to any form of criticism or complaint
- 5. Sexually provocative or asexual behavior, denial of body changes and sexual development; for females, seeking affection from older adult males
- 6. Experimentation with drugs and alcohol
- 7. Self-abusive behavior including cutting self, preoccupation with danger and weapons, suicide attempts.
- 8. Truancy from school
- 9. Cruelty to animals
- 10. Bullying younger children
- 11. Emotional numbness, inability to be emotionally supportive to others
- 12. Having few friends, changing friends often
- 13. Depression and other signs of withdrawal and avoidance
- 14. Pregnancy
- 15. Refusing to attend to basic hygiene
- 16. Rectal and vaginal infections
- 17. Hyper-vigilance excessive and suspicious watching of other people; easily startled

D. Neglect

- 1. Appearing to be underfed, constantly hungry, underweight for size and age
- 2. Begging for food, stealing food, hoarding food
- 3. Lack of supervision, underage child supervising another child/children
- 4. Chronic absenteeism from school, unattended educational needs
- 5. Unattended medical, dental needs
- 6. Consistent or frequent lack of hygiene, poor hygiene, or lack of cleanliness resulting in odors
- 7. For infants, failure to thrive

E. Parental Behaviors and Home Life

- 1. Not attending meetings about the child, not showing an interest in the child, critical of child, uncomplimentary, unsupportive
- 2. Constantly putting child down, using harsh words to describe child, using threats and unflattering language

- 3. Describing child as underachiever, complaining that he/she lets people down, is unmotivated, achieves less than brothers and sisters
- 4. Speaking of a child in a way that sounds romantic, too grown-up, too sugary, too perfect
- 5. Hostile, close-minded, overprotective, isolating, doesn't let others in the house, won't participate in activities with other parents, makes excuses about failing to do task, talk about things not being good at home
- 6. Reports of past/other suspicious behavior, reports that an older brother or sister may have been mistreated
- 7. Chemical dependency by one or both parents
- 8. Sudden and dramatic changes in family's financial security

Responding to a Child's Report of Abuse

- ♦ Take the child seriously when he/she tells the story
- Avoid judgmental statements such as, "I think you just had a bad dream."
- Do not appear frightened or disgusted by the child's story, since this may cause the child to stop talking or to believe you are upset with the child.
- Do not try to convince the child that the story isn't true or that it did not happen the way the child reports it did.
- Do not make promises to the child that you will not tell anyone what has been shared with you.
- Remind the child that whatever happened was not his/her fault.
- Remind the child that it was a good decision to tell someone what happened to him/her.
- Tell the child that you want to find help so the incident can be prevented from happening again.
- Do not offer a child a reward for telling the story or promise of a gift if the child tells another adult.
- Reassure the child that he/she does not deserve to be hurt by anyone.
- Do not frighten the child by talking about police involvement or medical examinations to verify the complaint; instead, share with the child that other people need to know about what happened, and they will talk to the child later.
- Do not ask the child to show you any bruises that are beneath the child's underwear or clothing; only observe those bruises that are accessible. In some communities, removing a child's clothing even to confirm a report of abuse is a violation of the law.
- Do not investigate the child's story; rather, listen to the story, and take notes immediately afterwards while it is still fresh in your memory.
- Do not tell the child that he/she has been abused.
- Offer to support the child and remind the child that you care about him/her.
- Follow through in consecutive weeks and months by speaking to the child and offering support.

Responding to Parents Who are Notified of an Abuse Report

- Remain calm and nonjudgmental.
- ♦ Anyone who makes a report to the police or child protection authorities is usually granted anonymity; do not identify the reporter unless you are given permission to do so.
- ♦ Do not share any statements made by the child with a parent or relative who is implicated by the child as an abuser. It is advisable not to share the child's statements with anyone other than the authorities until the identity of the abuser can be determined and authorities have determined whether or not the child can be protected from contact with that person.
- ♦ Do not attempt to convince a parent that the alleged abuse happened or did not happen; do not attempt to discredit the child or to cast suspicion on the alleged abuser.
- ♦ Do not investigate with a parent what may be happening in the home; and do not share information with a parent that has not been shared with the authorities.
- Do not make promises to a parent about the outcome of the investigation.
- ♦ Listen to any information a parent may offer about the incident and record it immediately after the conversation; report additional information to authorities through the reporting procedure outlined in the church's policy.
- ♦ Offer parent(s) support.

- Suggest resources for parent(s) including books or literature that may be helpful to them.
- ♦ Allow parent(s) to express their disbelief, anger, grief (parent(s) may be in shock or denial at the mention of abuse allegations).
- Do not minimize the type of abuse, its impact on the child, or its harm to the child.
- Assure parent(s) of the confidential nature of the report and the need to maintain confidentiality unless disclosure is necessary to protect the well being of other children.

<u>Recommended Screening Steps</u> Criteria used: Amount of responsibility, contact with children/youth; inovlvment with money/bookkeeping.

6-month membership rule applies to all volunteer positions dealing with children or youth. ONLY exception is new member having much involvement with previous church, verbal and written recommendation from previous pastor and clear check on all other areas.

Do sistem	A	1	Deference	Cultural on a lo	Online Sex	Prf
Position	Application	Interview	References	Criminal Check	Offender	License/Ins.
Ordained/Called Staff	X	Х	Х	Х	X	X
Support Professional Staff	X	Х	Х	Х	X	Х
Office Staff	Х	Х	Х	Х	X	
Custodial Staff	Х	Х	Х	Х	Х	
Preschool Staff	Х	Х	Х	Х	Х	Х
Preschool Parent Helpers	Х			Orient. Conf. form	Х	
Handbell Director	Х	Х	Х	Х	Х	
Choir Director	Х	Х	Х	Х	Х	
Elders w/financial	Х	Х	Х	Х	Χ	
Youth Group Leaders	Х	Х	Х	Х	Χ	Х
Youth Event Chaperones	Х	Х	Х	Х	Χ	Х
Confirmation Asst.	Х	Х	Х	Х	Χ	
SS Staff	Х	Х	Х	Х	Х	
VBS Adult Staff	X	Х	Х	Х	Х	
VBS Youth Staff	Х	Х	Х			
Nursery- Adult	Х	Х	Х	Х	Х	
Nursery-Youth	Х	Х	Х		·	
Centershot - Adult	Х	Х	Х	Х	Х	
Centershot -Yth Volunteer	X	Х	Х			

FINANCIAL These steps apply to all official signators listed on checking or savings accounts.

Position	Application	Interview	References	Criminal Check	Online Sex Offender	Prf License/Ins.
Financial Secretary	Х	Х	Х	Х		
Tellers	Х	Х	Х	Х		
Church Treasurer	Х	Х	Х	Х		
Preschool Treasurer	Х	Х	Х	Х		
SS Financial Staff	Х	Х	Х	Х		
Student Fund Treasurer	Х	Х	Х	Х		
Youth Treasurer	Х	Х	Х	Х		
MILL Treasurer	Х	Х	Х	Х		
Women's Ministry Treasurer	Х	Х	Х	Х		
Congregation Chairman	Х	Х	Х	Х		
Endowment Committee	Х	Х	Х	Х		
Computer Committee	х	Х	Х	Х		

Incident Report

This form is to be filled out by any adult witnessing an incident or injury and given to the ministry leader, pastor, Director of Christian Education (DCE), or Parish Administrator.

This incident report should be completed as soon as possible after the incident occurs and should include as detailed a description of the situation as possible.

Date:	Service/Event:					
Person Involved: Member Visitor (Circle						
Phone Number: Address:						
Location of incident: Church	nt: Church Education Building Grounds					
Other –	please specify:					
Person Completing Form:						
Type of Incident: Accident	Accident Illness Behavioral Other					
Description of Injury / Illness / Inc	cident:					
Services Delivered: Check all that						
\square CPR						
\square AED						
☐ First Aid						
☐ 911 call						
Other action taken:						
Other persons attending:						
Were the police called?Yes	No If yes, what is the report number?					
Were parents/guardians called? _						
-	List items					
••						
Follow up (to be completed by Paris	sh Administrator)					

Appendix E

Suspected Abuse Report Form

(This form is to be filled out by an adult when any type of abuse is suspected but not actually witnessed. This report must be given to the Ministry Leader, pastor or Director of Christian Education (DCE) within 24 hours.)

Date		
Name of Child / Youth		
Age of Child / Youth	Grade	School
Address		
Phone Number		
Parents or Legal Guardians		
Names of Siblings		
Name of Person Filing Report		
Name of Person Receiving Report		
Nature of suspected abuse (physical, se	exual, emotional, negl	ect)
Indications of suspected abuse (including	ng facts, physical sign	ns and course of events)
Action taken (including date and time)		
Signed(Person Reporting)	Signed	(Pastor, DCE, or Cong. Chairman)

The above information will serve as a guide and will be helpful if a formal report is filed with the police or appropriate government agency. All information received is to be kept **STRICTLY CONFIDENTIAL.**

Appendix F

Suspected Abuse Follow-Up Report Form	
Date	
Name of Student	
Address	
Phone #	
Name of Person Who Filed Initial Report	
Name of Person Receiving Report	
Conclusions	
Action Taken (Including dates and times)	
Signed(Person Receiving Report)	

The above information will serve as a guide and will be necessary if a formal report is filed with the police or appropriate government agency. All information received is to be kept **STRICTLY CONFIDENTIAL.**

Training Documentation Form

For Volunteer to complete:				
I certify that I have attended Abuse Prevention and Response training related to my involvement with children and or youth ministry at St. Luke's Lutheran Church.				
Date of training:				
I understand that St. Luke's has the right to change or amend the Policies and Procedures Concerning Child Protection and Risk Management at any time. It is my responsibility to stay current on policy and procedure. I am aware that the most current master copy of the Policies and Procedures Concerning Child Protection and Risk Management is available in the church office and library.				
(Signature of volunteer or paid staff) (Date)				
For Ministry Leader to complete:				
I certify that the above signed individual has successfully completed the training course related to his/her involvement with children or youth ministry at St. Luke's Lutheran Church.				
(Signature of supervisor/ministry leader) (Date)				

St. Luke's Church and Preschool Harassment Report Form

It is the policy of St. Luke's Lutheran Church / Preschool to maintain a learning, working and social environment free from sexual and/or any other type of harassment. It shall be a violation of this policy for any member of St. Luke's Lutheran Church / Preschool community to harass any other person or persons through conduct or communications.

We will treat allegations of harassment seriously and will review and investigate such allegations in a prompt, confidential and thorough manner. A charge of harassment shall not, in and of itself, create the presumption of wrongdoing. However, substantiated acts of harassment will result in disciplinary action up to and including dismissal. Individuals found to have made false or frivolous charges will also be subject to disciplinary action up to and including dismissal.

Complainant:		
Home Address:		
Parent's Name (if minor):		
Home Phone:	Alternate Phone:	
Date (s) and location(s) of alleged in		
Name of alleged harasser:		
List any witnesses present:		
Describe the incident(s) as clearly a any, was used; any verbal stateme involved; what you did to avoid or en	ents (i.e. threats, demands); what and the situation; etc. (attach addition)	at, if any, physical contact was itional pages, if necessary):
This complaint is filed with my hone certify that the information provide knowledge.		described in this report. I hereby
Complainant signature:(Parent/Guardian if a minor)		Date:
Received Verbal Report by:Received Written Report by:		

(*Please attach a report on the investigation and recommendation before filing.*)