

Child Protection Policy

For the Northern Great Lakes Synod of the ELCA

(adopted by NGLS Council January 13, 2024)

Then [Jesus] took a little child and put it among them; and taking it in his arms, he said to them, "Whoever welcomes one such child in my name welcomes me, and whoever welcomes me welcomes not me but the one who sent me...." "If any of you put a stumbling-block before one of these little ones who believe in me, it would be better for you if a great millstone were hung around your neck and you were thrown into the sea." - Mark 9:36-37, 42

The Northern Great Lakes Synod (NGLS) seeks to provide a sacred and safe environment for all children. The goal of this policy is to reduce the likelihood of abuse in our church settings, minimize risks to youth, and protect employees and volunteers from false allegations of abuse. Because effective policies and procedures can greatly reduce the risk of abuse, the NGLS adopts the guidelines set forth in this policy. Definitions of abuse are identified in Appendix A.

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1. VOLUNTEER APPLICATION AND SCREENING PROCESS

Any person serving the children or youth at an NGLS sponsored event in a setting of instruction, control, or supervision is required to complete a Volunteer Application (see Appendix B). Volunteers working with children will be required to follow the policies outlined in this document. Information collected for background checks and sex offender reviews will be considered confidential and used only for the purposes stated in the policy.

Eligibility to serve youth or children is normally limited to persons over eighteen (18) years of age, who are active in the ministry of a congregation. Pastors and staff are subject to following the same policies as volunteers. The NGLS Office shall review and maintain records of screenings for NGLS staff and volunteers.

2. CODE OF CONDUCT

Those who accept the responsibility of working with children agree to:

- treat children with respect and dignity;
- do their best to prevent abuse, neglect, and exploitation of children participating in activities;
- not engage in or condone acts of physical, emotional, spiritual, or sexual abuse;
- report any abuse, inappropriate behaviors, or possible policy violations; and
- comply with this Child Protection Policy.

3. SAFETY GUIDELINES AND BEST PRACTICES FOR WORKING WITH YOUTH

For the safety and care of children and youth, the following guidelines shall be observed by all staff and leaders working or volunteering within the NGLS. Ministries or organizations external to the NGLS must follow this Child Protection Policy while using church facilities. Pastors, volunteers, and congregation members share responsibility for maintaining these guidelines, including the correction of others when in violation.

Open Spaces

Open spaces are encouraged to be used when working with youth. Open spaces allow for activities to be easily observable and interruptible by other adults. Open spaces include open doors and windows without coverings. Any rooms with the door shut are not considered open spaces.

The Two-Adult Rule

Whenever possible, two unrelated (e.g. not spouse, sibling, parent or child) adults should be present at all activities involving children. When two related adults are leading or chaperoning activities, at least one additional adult shall be present.

- A. Ratios Adult leaders should use good judgement in requiring an appropriate number of adults present during activities. The number of adults present may depend on the age and activity level of children participating.
- B. Childcare Setting Two or more teenagers may be allowed to watch children with the consent of parents during church activities such as worship, community meals, or congregational meetings, as long as it is in an open space and can be monitored.
- C. Sunday School Responsible teenagers may teach Sunday School in an open space that can be monitored.
- D. Working Alone If necessary, a single adult may be in an open space with a child if there is visual access and other adults can check in without advance notice. A child's parent should be notified before this takes place.

Digital Privacy

Advances in technology require additional vigilance to help protect youth from being exposed to information or images that may prove harmful to their wellbeing.

- A. Children and adults shall not send or share explicit or suggestive text, images, videos, or other inappropriate content electronically.
- B. Adults should avoid sending private messages to minors. It is best to include a parent or other adult in any conversation.
- C. To ensure full participation and the opportunity for a positive experience, youth may be asked to store electronic devices (cell phones, laptops, iPads, tablets) in a box or location away from youth for the duration of an event, unless the device is needed for a medical purpose (e.g. blood glucose check).
- D. Participants may opt out of having their photos taken or posted to any social media site or publication by filling out a Digital Privacy Request (see Appendix C).

Pastoral Care of Children/Youth

Unless licensed by the State as professional counselors, pastors and staff of a congregation may not engage in therapeutic counseling. Pastors may engage in pastoral care of the congregation member related to spiritual matters and personal crises to the extent of their training and expertise. Ministers must refer congregants to licensed counselors for matters requiring extended counseling or psychological evaluation. For pastors meeting with children or youth for spiritual care requiring confidentiality, the following protocols should be in place:

- A. Either a parent, ministry supervisor, or staff colleague will be informed prior to one-on-one meetings with child/youth.
- B. Another adult such as a parent, ministry supervisor, or staff colleague will be in the vicinity of the meeting space.
- C. Meetings shall occur during regular office hours, service, or event times, when possible.
- D. The meeting space shall allow for visibility through utilizing an open space or a location with open doors and/or uncovered windows.

Bathroom Guidelines

- A. Program leaders are to encourage parents to take care of their infant's toileting needs and to take their children to the bathroom prior to each program session.
- B. Parental consent must be given for any diapering and should be done in the presence and visibility of another adult.
- C. Two leaders shall escort children to the bathroom, when possible.
- D. No leader shall ever be alone with a child in a bathroom.

Off Campus Activities, Transportation, and Lodging

When youth events occur away from a church facility, extreme care should be taken to protect participants from abuse. Activities and accommodations should be arranged to maximize the accountability of adults, minimize adult ability to isolate children, and to make all facets of the event observable and interruptible. Off campus activities that do not require an overnight stay still require the application of the two-adult rule.

All effort will be taken to avoid a circumstance in which an adult is alone in a vehicle with a child. Parental permission for transportation as part of a planned event shall be obtained before any rides take place. Whenever possible, two adults shall be in a vehicle with minors. If vehicles transporting children only have one driver and are caravanning, care should be taken so that vehicles are not separated for an extended length of time. If circumstances allow for only one adult driver, youth should ride in the back seat. If emergency transportation is needed, every effort shall be made to contact parents or guardians prior to providing the ride. Those transporting children and youth must have a valid driver's license and current auto insurance.

Off campus activities that include overnight accommodations must include 2 adults, ideally one of each gender. Additionally,

- A. No adults should room with children in a tent/dormitory/hotel setting.
- B. Children/youth of the same gender and similar ages should room together in a dormitory/hotel setting.
- C. The Two-Adult Rule applies for room/bed checks and all other activities.
- D. Privacy must be maintained when showering.

Physical Contact and Affection

Healthy boundaries are a way to embody discipleship and care for our bodies. For this reason, physical signs of affection such as hugs are permissible when both parties fully consent to the contact. Other options include high fives and fist bumps. If at any time, consent for contact is revoked, the contact will end immediately.

Contact such as wrestling, tickling, and lap sitting is discouraged as these are typical avenues through which grooming behaviors are tested.

The church shall be a safe place to talk about, among other things, our God-given sexuality, and so it must remain a safe place for all our youth. Youth events are not the place for romantic or sexual behavior, language, or activity between youth. At NO TIME is romantic or sexual behavior, language, or activity between adults and children acceptable.

Correcting Behavior

When working with children, there will always be situations that require correcting behavior. The NGLS strives to teach our children to interact with love and kindness, to respect boundaries, and to care for oneself.

Adult leaders are encouraged to praise in public and correct to the side. This means that positive reinforcement is welcome in front of others, but any correction of behavior is best done one-on-one, to the side of the rest of the activity. If behavior needs to be corrected, it will be done in an age-appropriate way. Options for correction include a verbal warning, sitting out from the activity (time out), speaking with parents or guardians, or requiring parents or guardians to remove the child from the activity. Yelling at, berating, or physically disciplining a child is never allowed.

Gun and Weapons Safety

Guns, tasers, knives (excluding cutlery and small pocketknives), or any other weapons* are not permitted at NGLS sponsored youth events. This includes concealed carry.

*Non-lethal self-defense items such as pepper spray should be stored with personal belongings during any youth event. These items must only be used in the way they are intended – for self-defense against true threats. If an item is used otherwise, it will be confiscated. The pastor(s) or adult leader will determine whether an item falls in this category if it is unclear.

Alcohol, Tobacco & Other Drugs

There will be no alcohol, tobacco (including vape products), or other drugs present or consumed at any NGLS sponsored activities or programs specifically designed for children and youth. Adult leaders may not be under the influence of any alcohol or drugs when volunteering for youth activities or programs.

4. GUIDELINES FOR REPORTING ABUSE

In maintaining our moral duty to protect children, adults must report abuse, suspected abuse, or neglect. Any person having reason to believe that a child has been abused should follow these guidelines for reporting abuse. Reasonable suspicion does not require proof, but suggests there is evidence that a reasonable person could conclude abuse occurred. Observation of physical signs of abuse, signs of suspected abuse, or the disclosure of a child regarding abuse all satisfy "a reason to believe" for reporting abuse.

Clergy acting in the regular course of their work are considered mandatory reporters for incidents of child abuse. Any concerned person can report suspicions of child abuse and neglect and remain anonymous. If a report is made in good faith and without malice, that person will not be subject to civil or criminal liability. "In good faith" means that the person submitting the report believes what he or she is reporting to be true.

Reporting Abuse

In the event a child discloses abuse or abuse is suspected, do not question the child regarding events. Act to ensure that the child is safe, then document their words or the cause for belief abuse occurred. Additionally,

- A. If the child is in immediate danger, call 911.
- B. Call Child Protective Services, 1-855-444-3911 (reports may be made anonymously).
- C. Make verbal contact with the pastor or congregational president, and
- D. Submit a written report of the incident with 24 hours to the pastor (see Appendix D).
- E. Additional support can be obtained by calling the ChildHelp National Child Abuse Hotline, 1-800-4-A-CHILD (1-800-422-4453).

Protecting the child from abuse is the priority when making a report. Follow the instructions received from Child Protective Services and maintain strict confidentiality following the report of abuse. Allow Child Protective Services to contact parents or others involved in the disclosure and/or investigation. Do not contact parents or others involved in the incident.

Child Protective Services will investigate the allegation of abuse and make recommendations for further action in accordance with their authority. Congregational pastors and/or leaders shall cooperate with the investigation by local authorities.

The pastors shall, as soon as practical, consult with the following:

- A. Appropriate legal counsel, for help in determining a complete and legal course of action in regard to the suspected abuse and
- B. The church's insurance company, to notify them that a report has been filed and what actions were taken.

The pastor shall act as, or designate, the official spokesperson for the church. Additional responsibilities include:

- A. Providing spiritual care and emotional support for those involved in the incident and their families; and
- B. if the abuse occurred at church or during a church event, evaluating policies and procedures to ascertain if deficiencies in policy abetted the abuse.

Abuse Reported Against a Rostered Leader, Employee, or Volunteer

Any allegation of abuse by a church employee or pastor shall be taken seriously and reported as outlined in this policy. Additionally, the NGLS shall be notified of the report and the employee or volunteer will be removed from his/her position, pending the completion of the investigation. Any person who admits or is found guilty of abuse will be terminated from employment and/or dismissed from their duties with children/youth.

Procedure for Reporting Violations of the Child Protection Policy or Other Child Safety Concerns

Protecting children is the responsibility of adults. If any adult witnesses a violation of the Child Protection Policy or other child safety concerns, they should report concerns and:

- A. Act to bring the situation or individual in compliance with the policy, if possible.
- B. Note the date, time, and individuals (both adults and children) involved in the violation or concerning activity.
- C. Report the concern or violation to the NGLS, pastoral staff, or council president using the Policy Violation Report (see Appendix D).

Upon the receipt of a Policy Violation Report or other concern, NGLS leaders and church staff must:

- A. Seek to correct the policy violation and bring the environment or person into compliance, if possible.
- B. Recommend any appropriate disciplinary or other remediating response to the violation or concern.
- C. Review and/or update any policy guidelines that need to be addressed.
- D. Report any remedial actions taken (see Appendix D).

5. SEX OFFENDER POLICY

The NGLS seeks to demonstrate the love of Christ. To be a safe place for all who attend, and to be respectful of anyone who has been a prior victim of sexual assault, individuals who register as sex offenders must comply with the following policy in order to participate in the congregational life of the church.

The church retains the right to deny attendance, participation, and/or membership to any individual who fails to comply with this policy. Furthermore, the church retains sole discretion to deny attendance, participation, and/or membership to any person whose behavior, criminal conviction, and/or sex offender status gives reason to believe that person would endanger others, regardless of policy compliance. Failure to comply with the church's request to vacate the premises or activity will result in reporting to law enforcement.

When a known sex offender seeks participation in a congregation or NGLS sponsored event, the pastoral staff or designee will contact involved law enforcement, parole officers or intervening experts, and create a ministry plan and communication plan which will inform the congregation of the presence of the offender and ensure safeguards and procedures being enacted.

Policy Standards

Any registered offender is expected to self-disclose their status as a registered sex offender to the congregation's pastor prior to attending services or activities. Registered sex offenders will be required discuss and agree to adherence of the Attendance Agreement for Registered Sex Offenders (See Appendix E).

Offenders will meet jointly with a pastor of the church and a designated church monitor to review this Child Protection Policy and Attendance Agreement. The attendance agreement, which stipulates the conditions of participation, permission for background and reference checks, and gives permission for the release of information, will be signed by the offender, pastor, and designated monitor prior to attendance at a church service or event.

The church will assign a monitor to offenders who will accompany them while on the church property or at an offsite event. Monitors will be selected from the church council or congregation, as deemed appropriate by the pastor. Family members and/or relatives of the offender may not serve as monitors. Monitors are subject to the same background checks as people working with children. If a monitor is not available on any given day, the offender may not attend.

Offenders will check in with their monitor immediately upon arrival at the service/event. The monitor will "shadow" the offender at all times for the duration of the service/event.

Offenders may only attend worship services and/or activities, with or without children/youth present, when each of the following conditions are met:

- the service or activity is a publicly announced, church-sponsored event;
- there are at least five (5) other adults present, including the offender's monitor; and
- the offender is in full compliance with the attendance agreement.

Offenders are prohibited from attending services or activities of the church under any of the following circumstances:

- if any victim of the offender, or family member of a victim of the offender, is a member or regular attender of the church;
- if the offender has a history of failure to comply with limited access agreements in other churches or settings;
- if the offender fails to agree with, and/or comply with, the policies or requests of the church; or
- any time that there are youth specific worship services, events, or activities.

If at any time an individual ceases to be a registered offender, a copy of the court order removing the designation will be submitted to the pastor. At that time, the pastor will initiate an evaluation to determine what restrictions shall remain in place.

Definitions of Types of Abuse

Physical abuse of a child is a non-accidental injury inflicted on a child by a parent, caregiver, or other person having responsibility for the child.

Physical abuse:

- may include various physical injuries ranging from:
 - bruises;
 - fractures;
 - burns;
 - scrapes or cuts; or
 - death;
- as a result of:
 - punching;
 - beating (with hands, stick, strap, or other object);
 - kicking;
 - biting;
 - shaking;
 - throwing;
 - stabbing;
 - choking; or
 - burning.

Neglect is abuse that is the failure of a parent, guardian, or other caregiver to provide for a child's basic needs. Neglect may be:

- physical, such as failure to provide
 - adequate food;
 - necessary shelter;
 - appropriate supervision;
- medical, such as failure to provide
 - appropriate and timely medical treatment,
 - necessary medication;
 - mental health treatment;
- educational, such as failure to provide
 - age-appropriate education or schooling;
 - assurance of school attendance;
 - necessary special education support; or
- emotional, such as failure to provide
 - attention to a child's emotional needs;
 - psychological care;
 - supervision preventing alcohol or illegal drug use.¹

¹ Physical abuse and neglect definitions adapted from "What is Child Abuse and Neglect? Recognizing the Signs and Symptoms" from Child Welfare Information Gateway at

Sexual abuse of a child/youth is any sexual activity with a child. The abuser may be an adult, an adolescent, or a child. Additionally, child/youth sexual abuse:

- may involve physical violence or emotional coercion as a means of exploiting the child/youth's vulnerability and powerlessness;
- could include touching a youth/child or causing them to touch an abuser, and may include the following behaviors:
 - inappropriate kissing;
 - fondling;
 - oral, genital, and/or anal penetration;
 - intercourse;
 - prostitution or trafficking
- may include the following non-touching abuse:
 - harassing comments;
 - exposure to, or participating in, pornographic material;
 - obscene phone, text, or other communication;
 - exhibitionism (exposing oneself);
 - allowing children to witness sexual activity.

Spiritual abuse of child/youth is any harmful action taken against them under the guise of religion. Spiritual abuse may be:

- use of religious ideology, language, precepts, traditions, or sacred texts to harm a child;
- compelling a child to engage in religious acts against their will;
- abuse that occurs in the religious context;
- abuse perpetrated by a religious leader/authority;
- invocation of divine authority to manipulate and harm a child.

https://www.childwelfare.gov/pubPDFs/whatiscan.pdf#page=3&view=What%20Are%20the%20Major%20Types%20of%20Child%20Abuse%20and %20Neglect? accessed 1/30/2019.

Application to Volunteer with Youth

All adults 18 years of age or older seeking to work with youth and childro	en
in the Northern Great Lakes Synod must complete this application.	

	s) (including any previous names or maiden names):		
	s:		
City:	State: Zip:		
Phone:			
Email:			
	s License #:		
Birth D	ate:		
Please	answer the following questions.		
1.	Is there any reason why you should not work with children? Yes No If yes, please explain:		
2.	Have you ever abused or been accused of abusing anyone under 18 years old? If yes, please explain:	Yes	No
3.	Have you ever been arrested or convicted of a criminal offense? Yes If yes, please explain:	No	
Refere	nces.		

Please list the names and phone numbers of two people who are not related to you, and who you have known for at least five years who can serve as references for you.

1.			
2.			

I agree that the information contained in this application is correct to the best of my knowledge and consent to any background checks that may be done to ensure the safety of children I may work with. I agree to follow any NGLS and church policy guidelines and best practices that are set forth to help ensure protection and safety of minors.

Applicant's Signature _____ Date _____

Digital Privacy Request

(to be filled out by parent or legal guardian)

I, _____, do not want my photo to appear on church websites or social media.

I also do **not** want the photos of these family members to be used on church websites or social media:

I understand that all efforts will be made to ensure that these photos do not appear, though sometimes in group shots where it is hard to distinguish individuals, we may not be able to identify people well and choose to use a photo containing one of these individuals on the site. All efforts will be made to follow this directive.

This photo optout form will remain in effect until a request is made to rescind this directive.

If we have accidentally posted a photo including one of the individuals listed above, please contact the church office for removal of the photo. Please attach photos of the above-listed individuals to this sheet for identification purposes. These photos will not be released.

PRINT NAME: _____

SIGNATURE:

Appendix D

Incident Report for Abuse or Suspected Abuse of a Child and Policy Violation Report

Date: _____

Type of concern:

- □ Inappropriate behavior with a child
- □ Non-abuse policy violation with a child
- Possible risk of abuse
- □ Suspected abuse
- Observed abuse
- □ Suspected neglect
- □ Other concern:

Please describe the situation. Attach additional sheets as needed.

- a. What happened?
- b. Where did it happen?
- c. When did it happen?
- d. Who was involved?
- e. Who else was present?
- f. Did anyone else observe the behavior of concern?
- g. Was the parent of the child present?
- h. Did the parent observe the behavior of concern?
- i. What was the parent's reaction?

Was the incident reported to the police or 911?	□ Yes	□ No
Was the incident reported to child protective services?	□ Yes	□ No

If reported to the police or child protective services, what was their response and recommended course of action?

Who from the church was contacted?

Pastor

□ President of the Congregation □ Other (Name_____)

To your knowledge, has this type of situation happened before? If so, please describe what you know.

If so, do you know what, if any, action was taken? Who was involved? Who was questioned?

Do you know if police or child protective services were called for the ea	arlier situation?	
		□ No
Have you spoken to anyone else about this incident?	□ Yes	□ No
If so, who?		

Would you like someone to call you to discuss this situation?

I certify the above information is true to the best of my knowledge. If report was given verbally, please have both the person providing the information and the person taking notes sign.

SIGNATURE:	 DATE:	

SIGNATURE:	 DATE:	
SIGNATURE:	 DATE:	

This Portion to Be Completed by Pastor or Congregational President after Incident Report is Submitted

Name of Person Completing this Report:	
Date:	
To your knowledge, has this type of situation happened before?	□ No
If yes, please describe any action taken.	
If yes, was Child Protective Services called for the previous situation? \square Yes	□ No
What is the follow up plan for the current incident being reported?	

SIGNATURE: ______ DATE: _____

Appendix E

Attendance Covenant for Registered Sex Offenders

As a registered sexual offender, I agree to the following conditions:

- 1. I will be assigned a monitor who will accompany my access to church services and activities.
- 2. I will meet with a court ordered Parole Officer (PO), or other similar officer, as prescribed.
- 3. I will meet with a certified sex offender treatment therapist, if required by my PO or Pastor without complaint.
- 4. I will provide the treatment therapist's name and phone number and the PO's name and phone number to the congregation's pastor.
- 5. I will get approval by the court ordered PO, therapist, social worker, and pastor to attend the church. A copy of a signed authorization from each of these providers must be provided to the pastor.
- 6. I will sign any appropriate releases giving my care team (PO, therapist, social worker, etc.) permission to contact and speak with my pastor.
- 7. I agree to have my picture, name, offense level, and a copy of this signed covenant provided to all church pastors, ministry lay leaders, and staff before attending a church service or activity.
- 8. I agree to have my picture, name, offense level, and a copy of this signed contract included in the records of the church and available to all staff and congregation members.
- 9. I will not attend any church services or activities nor be present on the property of the church or offproperty gathering locations without my approved monitor. If my approved monitor is not available, I will not attend any church services or activities (nor will I be present on the property of the church or offproperty gathering location) at any time.
- 10. Immediately upon my arrival at a church service or activity, I will check in with my monitor. If my monitor cannot be located, I will promptly leave the church premises.
- 11. I will not serve in any role in a church ministry without prior approval from the pastor.
- 12. I acknowledge and agree that all children and youth areas are off limits at all times, even if my own children attend the church and are present and participating in a youth ministry or activity. In that case, I will walk my own children to the children's ministry area, but will make other arrangements for them to be picked up, such as having a children's ministry leader walk them back from the children's ministry area for me.
- 13. I will not supervise nor volunteer in any children's ministry or youth activities.
- 14. I will not visit the home of a church family where children are present, without the parents knowing my history and offense level and giving permission for my entry into their home.
- 15. I will promptly leave any area on church property where children are present with the exception of a populated church foyer, sanctuary, or area where five or more adults are present, including my monitor.

- 16. I will not have any physical contact with a child at church, including, without limitation, sitting next to a child other than my own, holding a child on my lap, or being hugged or kissed by a child at the church. If a child other than my own approaches me to talk, I will acknowledge him or her and promptly leave the area. I will report this to my monitor before leaving the church premises.
- 17. I will only use the bathrooms after my approved monitor has entered and found no children in the bathroom.
- 18. I understand that the church pastor and my approved monitor may retain records of our meetings, which will be available to the offender's therapist, PO, and court at their request.

Photo of Offender Placed Here

I understand the above conditions. I submit to these conditions and wish to attend this church. I accept that if I break any of the above conditions, I will no longer be allowed to be present at any church service or activity. Church pastors, employees, small group leaders, and congregation members are released from any legal responsibility or liability for disclosure of the above information to the extent indicated and authorized herein.

Printed Name of Offender:					
Address:					
City:				Zip:	
Phone:	_ Email:				
Signature of Offender:			Date: _		
Printed Name of Pastor:					
Signature of Pastor:			Date: _		
Printed Name of Designated Church Monit	or:				
Signature of Designated Church Monitor: _				Date:	
Additional Approved Church Monitors:					
Name:		Signature:			
Name:		Signature:			

Appendix F

Additional Resources

<u>Helplines</u>

1.	ChildHelp National Child Abuse Hotline Hotline is staffed 24/7	1-800-4-A-CHILD (1-800-422-4453)
2.	Child Protective Services	1-855-444-3911
3.	United Way Crisis Helpline	1-888-421-1266 or after hours dial 211
4.	Darkness to Light Helpline	1-866-FOR-LIGHT or text LIGHT to 741741
<u>Advoc</u>	acy Centers	
1.	Northern Lights Child Advocacy Center Marquette, MI	906-262-0091
2.	Superior Child Advocacy Center Marquette, MI	906-225-8478
3.	Caring House Child Advocacy Center Iron Mountain, MI	906-828-2622
4.	Child Advocacy Center of North Central Wisconsin Wausau, WI	715-848-8600
5.	Willow Tree Cornerstone Child Advocacy Center Green Bay, WI	920-436-8881
6.	Fox Valley Child Advocacy Center Appleton, WI	920-969-7930
<u>Sex O</u>	ffender Registry	
1	. National Sex Offender Public Website	https://www.nsopw.gov/
<u>Backg</u>	round Checks	
1	Trusted Employees	https://www.trustedemployees.com/
2	. Oxford Document Management Company	https://www.oxforddoc.com/
3	. Shepherd's Watch	https://www.group.com/background-checks/
4	. Ministry Safe <u>https://ministrysa</u>	afe.com/the-safety-system/background-check/
5	Wisconsin Online Record Check System	https://recordcheck.doj.wi.gov/