

Student Protection Policy

Immanuel Lutheran College

Dated 01 January
2026

Revision History

Revision	Revision Date	Summary of Changes	Approval
Original	10 July 2019	• Initial Release	Board of Regents
A	06 April 2020	• Recommended changes from Lessons Learned II; Weld-Riley legal review and others including additions of a revision history page and Sections 7.2, 12.3, 13.3	Board of Regents
B	23 June 2021	• Addressed recommended changes from the faculty	Board of Regents
C	09 April 2024	• Address changes to the mandatory training requirements per motion at the Fall 2023 meeting.	Board of Regents
D	05 January 2026	• Changed wording in Sections 2, 7.1, and 12.3 to clarify SPP application to professorages • Added Section 7.4 Professorages	Board of Regents
E	20 July 2026	• Updated wording in Section 2 to clarify when the SPP applies • Updated wording in Sections 6.1, 9, and 12.4 to comply with requirements of Wisconsin Statute 118.07 (7)	Board of Regents

Contents

1 Purpose 3

2 Responsibilities 3

3 Precedence 3

4 Important Concepts and Definitions 3

5 Employee and Volunteer Application and Screening 4

6 Training 4

6.1 Employee 5

6.2 Volunteer 5

6.3 Student 5

7 Supervision Principles 5

7.1 Observable and Interruptible 5

7.2 Off-Campus Supervision 6

7.3 Visitors 6

7.4 Professorages 6

8 Permissions – Transportation and Other 6

9 Communication 7

10 Behavior 7

10.1 Examples of Unacceptable Touch 7

10.2 Examples of Acceptable Touch 7

11 Dormitories 8

12 Enforcement and Exceptions 8

12.1 Mandatory Reporting 8

12.2 Incident Reports 8

12.3 Retaliation 9

12.4 Enforcement 9

12.5 Exceptions 9

12.6 Reporting to Board of Regents 9

13 Support 10

13.1 Alleged Victim 10

13.2 Alleged Offender 10

13.3 Statement of Advice 10

13.4 Privacy 10

14 Distribution and Review 11

15 Related Documents 11

...we will tell the next generation the praiseworthy deeds of the Lord, his power, and the wonders he has done. -- Psalm 78:4

Be alert and of sober mind. Your enemy the devil prowls around like a roaring lion looking for someone to devour. -- 1 Peter 5:8

1 Purpose

Immanuel Lutheran College and High School (ILC) exists for the express purpose of sharing the good news that the Son of God has come as True Man and True God in order to offer Himself as the perfect and complete sacrifice for the sins of every man, woman, and child … past, present, and future. ILC recognizes, however, that sin is present everywhere and offers this policy as a means to help protect our students from abuse and our employees and volunteers from false allegations of abuse and to guide employees and volunteers in working with the students. The intention of the SPP is to protect students at ILC in order to maintain a nurturing teaching environment.

2 Responsibilities

ILC employees and volunteers who accept the responsibility of working with students at ILC agree to:

- Comply with this Student Protection Policy (SPP)
- Treat students with respect and dignity
- Attempt to prevent abuse, neglect, and exploitation from occurring to students
- Neither engage in nor condone acts of physical, emotional, or sexual abuse
- Report any inappropriate behaviors or possible policy violations related to the SPP

All parents and visitors to ILC are also expected to comply with this policy.

ILC employees and volunteers are expected to maintain the standards of conduct established by this SPP in their interactions with students regardless of location or whether school is in session. The SPP applies to activities and interactions involving students that occur on the ILC campus, including at professorages, regardless of whether school is in session. The SPP also applies off campus when an employee or volunteer is acting in an ILC capacity or participating in or supervising an ILC-related activity. The ILC president will appoint the members of the ILC Student Protection and Safety Committee, which is responsible for overseeing the SPP and coordinating training and awareness.

3 Precedence

While ILC makes every effort to ensure that our policies and procedures are complementary and avoid conflicts, there are situations in which conflicts arise. In any such cases when other policies are not in agreement with the SPP, the SPP will take precedence.

4 Important Concepts and Definitions

Adult: A person who has reached the age of 18. Under Wisconsin statute 48.02, a person being investigated or prosecuted for a crime that has reached the age of 17 is considered an adult.

Bullying / Harassment: Any form of harassment that one should reasonably expect would demean, threaten, or hurt (physically or emotionally). It can be physical, verbal, demonstrative, or electronic and can take place in person, over the phone, through an on-line communication, or by any other means that communicates harassment. It can be one-on-one, or group based. Adults and children can be bullies.

Bystander Intervention: Any action to stop an activity that is a violation of this policy.

Child: A person below the age of 18.

Child Abuse: Acts or failures to act that cause injury, death, emotional harm or risk of serious harm to a child, or their physical, psychological, social, spiritual, or moral development. There are many forms of child abuse, including neglect, physical abuse, sexual abuse, exploitation and emotional abuse. While this abuse is typically adult to child, it can also be child to child, including sexual abuse when there is no consent.

Limited Access Agreement (LAA): Written agreement between ILC and a designated person that states that person's permitted access to the ILC campus and activities related to students. Each proposed LAA must be approved by the Board of Regents.

School in Session: The period of time when the dormitories are open or in connection with school-sponsored activities/events when the dormitories are closed.

Sexual Consent: An agreement to participate in a sexual activity. According to Wisconsin law, no child under the age of 16 can give consent.

Staff or Employee: Anyone who works for ILC for salary, wages or other compensation, or anyone who is formally called to serve at ILC.

Student: An Immanuel Lutheran High School (ILHS) student unless otherwise specified.

Volunteer: Anyone who provides services that require interactions with ILHS students and receives no compensation in the form of salary or wages.

5 Employee and Volunteer Application and Screening

All prospective employees and volunteers must:

- Be informed that if the screening process yields information that the applicant has abused a child in any way, or been convicted of a violent or sexual crime, or been convicted of any crime, the circumstances of which substantially relate to the circumstances of the particular job applied for, that person will not be able to work or volunteer at ILC. If the information indicates the applicant has been accused of a violent or sexual crime or convicted of any other crime, a deeper background check will be conducted. ILC will err on the side of caution in determining who will be allowed to work with students.
- Complete an application
- Consent to a background check
- Read the SPP and acknowledge understanding and compliance
- Disclose any criminal history or history of violent or abusive behavior
- Answer open-ended questions about that person's approach to child safety and things done in the past to ensure child safety

Those nominated for called positions must consent to a background check. The background check will be completed on the called servant after the call has been issued.

Background checks will be completed every four years.

6 Training

The dean of students will document all training required under Section 6.1, below, including who attended the training. He will retain that documentation for five years.

6.1 Employee

All employees will be trained using Board of Regents approved training material when they are hired and take refresher training in accordance with the following:

- Wisconsin Mandatory Reporting every three years
- Signs of child abuse every three years
- The contents of the SPP and the School Safety Policy annually
- Identifying, preventing, and reporting grooming and professional boundary violations annually, using training developed by the Wisconsin Department of Public Instruction (DPI) or other training approved by the Board of Regents that the Board determines is sufficient to ensure compliance with Section 9 of this policy and applicable Wisconsin law.

Employees designated by the ILC president will attend outside conferences and workshops on the topic of child safety in a school setting.

6.2 Volunteer

All volunteers shall receive written training on the contents of the SPP. Volunteers shall also receive annual training on identifying, preventing, and reporting grooming and professional boundary violations, using training developed by the Wisconsin DPI or other training approved by the Board of Regents that the Board determines is sufficient to ensure compliance with Section 9 of this policy and applicable Wisconsin law.

6.3 Student

All students, including college and seminary, shall be trained on the contents of the SPP and the requirements of God's law and Wisconsin law in the area of child abuse annually at the beginning of the school year or shortly after beginning classes if the student enrolls after the beginning of the school year. The High School Handbook, High School Code of Conduct and the College Handbook shall include this information. Training on the elements contained in those documents will satisfy this requirement.

7 Supervision Principles

7.1 Observable and Interruptible

The chief principle is that all activities involving employees, volunteers or college/seminary students with high school students should be observable and interruptible. There are many ways to adhere to this principle. Some examples are:

- More than one student is in the room
- More than one adult is in the room
- If meeting one-on-one with a student, the room door remains open. If the student requests the door be closed for privacy, then the door must either have a window or the room must be located on the ground-level floor and have outside windows that are not blocked and permit observation from outside the room.
- If there is a need to conduct a class or host an event at a professorage or other off-campus location, it must be approved by the ILC president or dean of students prior to the class occurring.

Areas where students are meeting with adults should be well lit. All employees, volunteers, and students should err on the side of caution.

ILC recognizes that a college student may date a high school student. In those cases, the students should ensure they act in God-pleasing ways and observe Wisconsin law regulations.

7.2 Off-Campus Supervision

For school-sponsored, off-campus activities where ILC employees or volunteers are supervising ILHS students, no ILHS student will leave the group without explicit permission from an adult responsible for the group. If an ILHS student is permitted to leave the group, they will be partnered with another student and remain together until they return to the group. Individual students may leave the group only if they are being released to their parent, guardian or other approved adult.

7.3 Visitors

ILC employees or volunteers may approach any visitor on campus and ask that visitor to leave if the employee or volunteer believes the visitor may endanger the safety of the students. The police may be called to assist.

Potential visitors who have been convicted or accused (active investigation) of a sexual and/or violent crime must notify ILC Administration of the situation. Other adults or students associated with ILC who are aware of a known or accused sexual and/or violent offender are expected to notify ILC Administration of their presence. There will be no access to the ILC campus until ILC puts in place a Limited Access Agreement (LAA) with the convicted or accused sexual and/or violent offenders. The LAA will err towards safety of students and the campus. This can include close supervision while on the campus and refusal to allow the known offender to have access to the campus.

7.4 Professorages

If a high school student visits a professorage, at least two other people shall be present and all SPP rules on Observable and Interruptible shall be followed to the extent possible.

8 Permissions – Transportation and Other

ILC uses a permissions system that allows parents and guardians to make their wishes known to the school regarding transportation and school-sponsored overnight stays when the student is under ILC supervision (school in session for residents; school hours for non-residents). No blanket permissions will be allowed except as specified below. All students are permitted to use school-sponsored transportation unless a parent or guardian specifically prohibits that transportation.

Parents or guardians of resident students must provide the school with a list that names each person who may transport the student. ILC employees and volunteers may be approved as a group rather than by name. Names may be added or removed from that list throughout the year. One-time permissions should be given directly to the dorm supervisor.

ILC operates a closed campus during school hours but allows students to leave the campus with permission in advance from parents or guardians. If a student leaves the campus during school hours, they must sign out either at the administration office (non-resident students) or at their dorm (resident students).

No student under age 16 may ride with other students except family unless a minimum of two other people are in the car.

Overnight stays for school-sponsored events require specific permission by each student's parents or guardians for each event. The request for permission should include a description of the transportation and overnight stay arrangements.

9 Communication

Employees and volunteers, when acting in their official capacity, shall maintain appropriate professional boundaries in all communications with students, both during and outside of school hours. This applies to all methods of communication, including in-person, telephone, text messaging, email, social media, messaging applications, and other electronic or online communications.

Communications shall be appropriate in content and method and shall be limited to matters within the scope of the employee's or volunteer's responsibilities or other legitimate ILC-related purposes.

For purposes of this section, these requirements apply to communications with ILC students, students enrolled at other schools, and students participating in a home-based private educational program.

This section does not apply to communications arising from family or personal relationships that exist independently of the employee's or volunteer's ILC responsibilities. Such relationships shall not be used to circumvent the requirements or protections of this SPP.

10 Behavior

No employee, volunteer, or ILC or ILHS student will touch another student in a way that is unwanted or is physically or sexually abusive.

10.1 Examples of Unacceptable Touch

- Sexually or physically abusive touch
- Touching of thighs, hips, pubic region, stomach, chest, lower back, or bottom – clothed or unclothed. Touches that occur as part of sports or student playful interactions that are neither sexual nor unwanted are not considered unacceptable touch.
- Any touch that is unwanted by the student
- Any touch that is secret (not observable and interruptible)
- Touch that sexually gratifies a person in any way
- Corporal punishment of any kind except as allowed in WI Statue 118.31.
- Tickling*
- Cross-gender lap-sitting (except for family members) *
- Cross-gender frontal hugs (except for family members) *

* Items marked with an asterisk may not warrant an incident report if everyone involved is a student. Simply correct the students.

10.2 Examples of Acceptable Touch

- Sitting side-by-side
- High fives, fist bumps, special handshakes
- Pats on the shoulder
- Side hugs
- Checking an injury when observable and interruptible or in an emergency

11 Dormitories

The dormitories are a special environment—the dorm itself is a home away from home, and the dorm parents, residence assistants, and fellow residents do their best to create and maintain a family environment. This environment leads to a familiarity between the residents and the staff that is an important factor in the well-being of the resident students.

This policy recognizes that there will be more frequent and informal contact between resident students and their dorm parents and residence assistants, including the frequent use of text messaging for communication, one-on-one conversations about a wide range of topics, and an arm around the shoulder as necessary.

Students should discuss with their parents or an ILC employee any concerns they have about the safety of the dormitory environment. At no time should students feel that they have to endure an environment that makes them feel unsafe.

12 Enforcement and Exceptions

The abuse of children is not only a sin, but a serious crime. When adults report suspected child abuse to legal authorities, their report could save a child's life. In contrast, silence about suspected abuse brings incredible harm to victims and emboldens offenders. ILC encourages all employees and volunteers, both mandated reporters and not, to contact the authorities immediately when a child discloses abuse, when they witness child abuse, or when they observe signs of abuse. ILC expects all adults associated with the school to practice bystander intervention when they see a policy violation or concerning behavior.

12.1 Mandatory Reporting

Wisconsin law (48.981(2)(a), (3)(a)(1)) requires an ILC employee (school employees are mandated reporters) to immediately report to county Child Protective Services (CPS) or local law enforcement, if the employee has reasonable cause to suspect a child they have seen as part of her/his/their work has been abused or neglected or has been threatened with abuse or neglect and the employee believes it will occur.

In addition, Wisconsin law (175.32) requires that any mandated reporter who believes in good faith, based on a threat made by an individual seen in the course of professional duties regarding violence in or targeted at a school, that there is a serious and imminent threat to the health or safety of a student or school employee or the public, make a report to law enforcement.

12.2 Incident Reports

Any employee who violates the SPP or who witnesses a violation of this policy that involves an ILC employee should submit an incident report to the ILC president [exceptions are specifically indicated]. Any employee who witnesses a violation of this policy that involves a student or other non-employee person should submit an incident report to the dean of students [exceptions are specifically indicated]. Incident reports will include the time and place of the incident, the persons involved, and a description of the incident.

Any student who believes that an employee or volunteer or any other ILC or ILHS student has violated this policy should report the incident to the dean of students or, if the incident involves the dean of students, to the assistant to the dean of students.

Incident reports concerning ILC employees or staff will be reviewed and acted upon by the ILC president as soon as possible, but not later than one week. Incident reports concerning ILHS or ILC students will be reviewed and acted upon by the dean of students as soon as possible, but not later than one week.

The Student Protection and Safety Committee will review all incident reports at the end of each

quarter to determine recommended improvements to the SPP and/or training.

Mandatory reporters must also follow state law.

12.3 Retaliation

Submission of a good faith complaint or incident report will not affect the complainant's or reporter's future employment, grades, learning or work environment, or work assignments. ILC will take appropriate action against any student, teacher, administrator, regent, or other school personnel who retaliates against any person who reports a violation of this SPP, or any person who cooperates in an investigation under this SPP. Retaliation includes, but is not limited to, any form of intimidation, reprisal, or harassment.

ILC supports any good faith complaint to appropriate authorities, even if the complaint is unfounded or unsubstantiated. Note that any person who knowingly and maliciously makes a false allegation with intent to harm another may be subject to disciplinary or legal action under applicable Wisconsin law.

12.4 Enforcement

The dean of students or assistant to the dean of students will investigate any student violations of this policy and proceed in accordance with ILC's disciplinary process, involving authorities if warranted.

The ILC president will investigate alleged employee or volunteer violations of this policy. Depending upon the nature and severity of the violation, prior violations, and other relevant circumstances, consequences may include additional training, counseling, a written warning, restrictions on or suspension from interactions with students, suspension from employment or volunteer service, termination of employment or volunteer service, or termination of a professor's call in accordance with the CLC Constitution. ILC will report matters to or otherwise involve public authorities when required by law or when warranted by the circumstances.When parents are not accused or at all suspected, ILC will notify them that their child is a victim of child abuse that occurs on or off campus.

All ILC employees and volunteers will cooperate with any investigations conducted by the police or other authorities to the extent that the law requires.

If authorities decline investigation and/or prosecution (for instance statute of limitation applies, or the authorities feel they don't have enough evidence), ILC may conduct an independent investigation, including hiring an independent and trained investigator, to determine what actions ILC may take to ensure the safety of students and the campus. A written report of the investigation will be provided to the ILC president and Board of Regents.

12.5 Exceptions

There are certain situations where prudent and practical actions require violation of the SPP. Ordinarily, exceptions should be approved in advance by the ILC president, but in the case of an unforeseen event such as a medical emergency, the person who violated the policy should file an Incident Report within 48 hours. All exceptions will be documented and maintained on file by the ILC president for a period of five years.

12.6 Reporting to Board of Regents

Any incident involving ILC students that involves reporting to or cooperation with public authorities will be reported to the Board of Regents within 48 hours.

13 Support

13.1 Alleged Victim

ILC will provide support to the alleged victim including, ensuring that the alleged offender doesn't have access to the alleged victim.

ILC will offer to provide a support liaison, preferably an ILC employee, to coordinate and communicate with the alleged victim and the alleged victim's family and offer both private and public support, including ministerial support, but will not provide legal advice. Information will be shared with the alleged victim's home pastor only if the alleged victim / victim's family wants information shared.

13.2 Alleged Offender

An employee, volunteer, or ILC or ILHS student who is an alleged offender of Wisconsin law as it pertains to this SPP will immediately be suspended and isolated from student interactions pending results of the investigation. This suspension is not a judgment of guilt, but rather an experience-based decision that benefits and protects all parties directly or indirectly involved. A Limited Access Agreement (LAA) will be put in place that dictates what, if any, presence the alleged offender can have at the campus. ILC will cooperate with authorities to determine the timing of initially notifying the alleged offender. If after investigation the alleged offender is found to be innocent or not prosecuted, ILC will determine future involvement with the school. If the alleged offender is found guilty or enters a plea agreement indicating guilt, the offender will be banned from the ILC campus until an LAA is put in place.

ILC will offer to provide a support liaison, preferably an ILC employee, to coordinate and communicate with the alleged offender and his or her family and to offer ministerial support in conjunction with their home pastor. This liaison will be a different liaison than provided to the alleged victim. Information will be shared with the alleged offender's home pastor only if the alleged offender / offender's family wants information shared.

13.3 Statement of Advice

For the concern of the well-being of involved parties, ILC cautions any uninvolved parties from public actions and comments related to any SPP event. While the actions and/or comments may be well-intended, they may unwittingly result in a variety of negative consequences to alleged victims and alleged offenders.

13.4 Privacy

It is the policy of ILC to keep sensitive matters private to the maximum extent possible. However, we will communicate with employees and others (e.g. home pastors) that need information for counseling; we also may publicize information in order to dispel rumors. At the discretion of ILC, matters of public record may be shared with all employees and students to provide factual clarity, offer counseling, and provide guidance on expected and God-pleasing behaviors in handling a difficult situation. The primary purpose of these communications is first to protect the victim as much as possible and also to protect the reputation of the alleged offender until investigations are completed.

14 Distribution and Review

The SPP will be distributed in the following ways:

- To parents and students in the ILC summer mailing before each school year
- On the ILC website
- Available in the ILC Administration building

All employees and volunteers must sign an acknowledgement of understanding and compliance before working with students and at the start of each school year thereafter.

The Student Protection and Safety Committee will review the SPP and any feedback from ILC stakeholders (employees, volunteers, parents, and students) at least once every three years and provide recommendations and updates for Board of Regents approval.

15 Related Documents

Acknowledgement of Understanding and Compliance

ILC Employee Application with background check consent

Volunteer Application with background check consent

Incident Report

Suggested interview questions

Limited Access Agreement example