

# Prevention of Child Abuse and Neglect/Policy

St. Joseph Academy  
(SJA)

Department:	Human Resources
Number:	300.29
Effective Date:	07/24/2013
Review Date:	2/5/2021
Revised Date:	1/24/2020
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- I. Policy: SJA is committed to sharing and applying all the components of this policy. This policy outlines the programs for children/students 6 weeks – 8<sup>th</sup> grade procedures on reporting child abuse and neglect, staff or volunteers being accused of abuse or neglect of a child, and situations where representatives from Child Protective Services (CPS) investigate a case at our organization.
- II. Procedures:
- A. **Definition of Sexual Abuse and Neglect:**  
**Sexual Abuse** is when a child is engaged in a sexual situation with an adult or an older child.  
**Neglect** is when a child's basic needs are not met for reasons other than poverty.
- B. **Guiding Principles:**  
The following guiding principles influenced the formulation of this policy.
- SJA is committed to selecting the best possible individuals to work and/or volunteer for the organization and to screen out individuals who are at risk of abusing children.
  - SJA is committed to creating and maintaining an environment in which children and adults interact in safe and appropriate manner.
  - SJA is committed to creating and maintaining an environment that safe guard against risk of abuse.
  - SJA is committed to prevent, recognize and respond to inappropriate and harmful behaviors and reinforce appropriate behaviors on a timely basis.
  - SJA is committed to provide staff and volunteer's information and skill to help them prevent and respond to child abuse, sexual abuse, maltreatment and neglect.
- C. **Background:**  
The Department of Public Instruction (DPI) and the Department of Children and Families (DCF) consider **individuals working with children mandated reporters**. This means teachers and volunteers are required to report any suspicions of child abuse and neglect. It is not our responsibility to prove that a child is being abused or neglected, our job and responsibility is to report our suspicions.
- D. **Reporting:**  
Prior to contacting child protective services, you need to do the following:
- Document your observations. You can write your observations in the medical log and/or you can complete an incident report.

- Notify your immediate supervisor, as well as, the Director of your suspicions. When age appropriate, the leadership staff may ask you to ask the child some open-ended questions about the incident, and/or it might be decided to ask the parent some additional questions.
- If it is deemed that this situation should be reported, the immediate supervisor or the Director will contact CPS.
- Please note, informing the leadership staff does not alleviate your responsibility for reporting your suspicions to CPS. You are to follow up with the leadership team to see if the incident was reported. If they failed to report the incident and you feel that this incident should be reported, you are to contact CPS and make the report. The phone number for CPS is 414-220-SAFE.

#### **E. CPS Referral**

When you contact CPS, they will ask you a variety of questions. Be prepared to provide the following information:

1. The Child's Name.
2. The Child's Date of Birth.
3. The Parent or Guardian's Name.
4. The Parent's Home and or Work Phone Number.
5. The Child's Home Address.
6. If the Child has other Siblings that live in the Household.
7. Describe the Incident

CPS may contact the parent and or visit the child at the Center. CPS will not inform the parent of who made the referral.

#### **F. CPS Visit**

Typically, when a referral is made to CPS, they will visit the child's home, as well as, the child care center. In the event that CPS visits a child at our center, the Director(s) should be notified immediately. The Director(s) along with the child's teacher or primary care giver will meet with CPS. In the event of both Director's absence, the manager on duty should be notified and meet with CPS along with the child's teachers.

In the event CPS wants to meet with the child alone, a space will be provided and a manager will wait outside the door while CPS meets with the child.

#### **G. Staff or Volunteer Being Accused of Abuse or Neglect**

If an accusation of abuse and neglect is made against a staff member or volunteer, the leadership will conduct an investigation. Depending on the severity of the situation, the staff (volunteer) member may be removed from the classroom and or be suspended without pay until the outcome of the investigation.

The Director will notify DPI or our licensing specialist of the accusation, as well as, inform him or her of the outcome. They will also notify the Human Resource Coordinator who then will notify our insurance carrier. If the staff member is found guilty of the accusation, employment with SJA will be terminated immediately.

#### **H. Investigation of Abuse or Neglect of a Child Outside of SJA**

If a staff member is involved with a case of abuse or neglect that occurred outside the agency, the staff member must notify the Director(s) immediately. The Director(s) will notify the proper authorities.

The disposition of the situation will be determined with input provided by DPI or our licensing specialist. Depending on the situation, the staff member may be suspended without pay until the outcomes of the case have been decided. If the staff member is found guilty of abuse or neglect or any misconduct involving a child, their employment with SJA will be terminated immediately. Any volunteer accused of abuse will not be permitted in the building until an investigation is completed and their name is cleared. In all investigations, SJA employees and volunteers are expected to cooperate fully with the proper authorities.

**ST. JOSEPH ACADEMY**  
**1600 West Oklahoma Avenue**  
**Milwaukee, WI 53215**

### **POLICIES AND PROCEDURES**

#### **To Protect Children and Youth from Abuse and Neglect**

SJA programs are committed to providing a healthy, nurturing environment for children ages six weeks of age to 8<sup>th</sup> Grade. SJA is a faith-based educational organization sponsored by the Felician Sisters. Our mission is to educate children to be successful life-long learners and problem solvers. We are guided by the core values of Respect for Human Dignity, Compassion, Justice and Peace, Transformation, and Solidarity with the Poor. We partner with families and community to fulfill this mission.

The Academy strives to enrich family life by helping youth develop socially, emotionally, and academically by offering our Early Childhood program for children 6 weeks – 4 years and K4-8<sup>th</sup> grade.

These policies and procedures are a component of the **SJA Employee and Volunteer Handbook** which outlines all practices to ensure the well-being of the children in our care.

#### **DEFINITIONS of CHILD ABUSE and NEGLECT**

##### Child Abuse Defined

Abuse can be physical, sexual, or emotional, or it can be any form of neglect. The Federal Child Abuse Prevention and Treatment Act (CAPTA) defines abuse as “any recent act or failure to act on the part of a parent or caretaker which results in death, serious physical or emotional harm, sexual abuse or exploitation; or an act or failure to act which presents an imminent risk of serious harm.” This applies to any young person under the age of 18.

##### Physical Abuse Defined

Physical abuse is any physical injury caused by hitting, beating, and punching, shaking, kicking, or biting or any other physical harm to a child. The injury may or may not be intentional. It may result from over-discipline or punishment.

##### Child Sexual Abuse Defined

Child sexual abuse involves any sexual activity with a child or youth. This includes sexual contact that is accompanied by enticement, force, or threat of force, regardless of the age of the participants, and all sexual contact between an adult and a child, regardless of whether there is deception or the child understands the sexual nature of the activity. Sexual contact between an older and a younger child can be abusive if there is a significant disparity in age, development, or physical size. The sexually abusive acts may include sexual penetration, sexual touching, or noncontact sexual acts such as exposure or pornography.

### Emotional Abuse Defined

Emotional abuse may involve verbal or psychological abuse or mental injury. It includes acts or omissions by parents or other caregivers that have caused, or could cause, serious behavioral, cognitive, emotional, or mental disorders. Emotional abuse may also include extreme or severe acts of punishment. Physically or sexually abused children are usually emotionally abused as well.

### Neglect Defined

While there are several forms of neglect, including educational, emotional, environmental, medical, and developmental, child protection agencies usually use the term to mean physical neglect. Physical neglect is the failure to meet a child's basic physical needs, such as food, shelter, clothing, and hygiene. Neglect is a form of abuse.

**NOTE:** The definitions above usually pertain to adults and caregivers. Within SJA, we are also concerned about youth-on-youth abuse, which can range from bullying to other forms of abuse. We are committed to preventing abuse from occurring at all levels.

#### **Is it abuse – or just a different culture?**

Just like the larger society, SJA is culturally and ethnically diverse. There may be cultures, values, or customs within a community or family that vary greatly. Some practices may just be different; they may seem unusual, but not abusive. For example, there may be family rules about independence, obedience, or eye contact.

However, no matter how different a family's beliefs are, the definition of abuse is not flexible. If a cultural practice seems to fall within the legal definition of abuse, it may be abuse and should be reported.

### **SJA Child Abuse Prevention Policy**

The Child Abuse Prevention Policy has been established to protect the children in our care from incidences of abuse. The purpose of this policy is to empower SJA staff members and volunteers to prevent, recognize, and react responsibly about all forms of child abuse. SJA's programs take place in safe, nurturing environments that foster healthy relationship building between adults and youth and between youth and youth. All youth and their parents or caregivers, including St. Joseph staff members and volunteers, must be confident that such a positive environment exists.

The Child Abuse Prevention Policy includes procedures that ensure effective screening and selection of all employees and volunteers. In order to prevent child abuse from taking place, the policy presents guidelines for interactions between individuals at SJA at all sponsored activities as well as off-program hours. The policy identifies concrete methods to ensure safe environments and offers training in prevention strategies. Training is required for staff, volunteers, and all others involved in the caretaking of youth served by SJA. The policy provides instruction on monitoring the behavior of the youth, staff, and volunteers. Additionally, written directives are provided for responding to inappropriate behavior, breaches in policy, and allegations and suspicions of child abuse if they should occur. This policy includes reporting child abuse that may be occurring outside of the SJA environment if it is witnessed or reported by a child.

#### **1. Screening and Selecting SJA Staff and Volunteers**

*Goal: To select the best possible individuals for staff and volunteer positions and to screen out individuals who have abused youth or are at a risk to abuse.*

### **Written Application (for employment and volunteer positions)**

The written application includes the name, address, phone number, and social security number, and birth date, prior experience working with minors, educational background, and residential information of the applicant. No individual can work or volunteer without ongoing adult supervision.

### **Professional Reference Checks**

The applicant must sign a liability release that includes permission for the Center to conduct reference checks. Reference information is strictly confidential and Center staff will take appropriate measures to ensure that the information is not accessible to unauthorized individuals. The SJA requires that references come from a variety of objective sources.

- Professional reference procedures include documentation of information:
  - Obtain verbal, not just written, references for applicants. Conversations often provide more information and allow an opportunity for follow-up questions.
  - Match references with employment and volunteer history. Is anything missing? Make certain that references come from a variety of sources. Always check former states where applicants may have been employed.
  - If a former employer will provide only basic information such as dates of employment, clarify whether the person providing the reference is limiting information because of company policy.
  
- Reference check questions will include some of the following:
  - How would you describe the personal characteristics of the applicant?
  - How does the applicant interact with youth?
  - Why would this person be a good candidate for working with youth? Is there any reason this person should not work with youth?
  - Have you seen the applicant discipline youth which may include his or her children?
  - Would you want this person to be involved in your organization (again)?

### **Criminal Background Checks**

Permission must be obtained from applicants before completing the criminal background check. The SJA uses the BACKGROUND INFORMATION DISCLOSURE form of the State of Wisconsin. It is to be completed by all applicants being considered for employment. Online responses give immediate information to the Human Resources Coordinator regarding the criminal background of applicants. No applicant or volunteer may be permitted to work with youth until this process has been completed. If an applicant or volunteer has work experience in another state, the HR Coordinator will secure information from the appropriate state entities before the individual may begin to work or volunteer.

Criminal background checks typically include name, social security number, and are conducted at the county and state level unless extra measures are necessary. Internet searches will be carefully conducted due to the possibility of more than one person sharing the same name. The Center will keep results of criminal background checks confidential. As with all personnel records for staff, background checks are maintained in the Human Resources Office in a locked cabinet with access by the HR Coordinator and Center administrators. Volunteer records are maintained in the Volunteer Coordinator's Office. SJA routinely conducts criminal background checks on all employees and volunteers annually.

### **In-person Interview**

The SJA staff interviewer is encouraged to ask follow-up questions from previous steps in the screening and selection process including the applicant's written application. Interview questions may address the

applicant's experience working with youth, his or her reasons for wanting to work with youth, his or her beliefs about disciplinary techniques, and his or her interpersonal relationships.

Job applicants and volunteers are informed about the Center's abuse prevention policy and procedures. Applicants and volunteers are informed that after the required orientation, they will be required to sign a document verifying that they have received and read the SJA Employee and Volunteer Handbook (which includes these Policies and Procedures). They also will indicate by signature that they completed the training and agree to abide by the policies and procedures set forth.

SJA maintains records of applicants who are disqualified during the screening process or those employees or volunteers who are dismissed because of an offense.

## **2. Interactions Between Individuals**

*Goal: to ensure the safety of youth in their interactions with SJA staff or volunteers and with each other.*

SJA provides a nurturing environment by supporting positive youth development, helping youth to feel valued, and providing the caring connections that serve as protective factors for youth. Guidelines are provided to ensure positive and appropriate interactions among youth and between staff and volunteers. In promoting and ensuring such positive interactions, the Center identifies behaviors that fall into the categories of appropriate, inappropriate and harmful.

- **Verbal Communication**
  - Appropriate: praise; positive reinforcement for good work or behavior.
  - Inappropriate/harmful: sexually provocative or degrading comments or put downs; risqué jokes; or use of obscene language.
- **Physical Behavior**
  - Appropriate: pats on the back or shoulder or high fives. Note that the use of any physical contact should be used with discretion.
  - Inappropriate/harmful: patting the buttocks; intimate/romantic/sexual contact; corporal punishment (involving physical contact or inflicting pain or discomfort); or involving youth in any pornographic activities.
- **Additional Interaction Guidelines**
  - SJA promotes activities that help youth develop socially, emotionally, and cognitively.
  - The children are clearly instructed on how to promote positive interactions and what constitutes inappropriate or harmful interactions among groups.
  - SJA requires that, whenever possible, more than one adult is present with one or more youth.

## **3. Ensuring Safe Environments**

**Goal: to keep youth from situations in which they are at increased risk for abuse.**

SJA encourages staff and volunteers to engage in ongoing, active interaction with youth. This ensures a higher level of youth supervision and monitoring. The administration conducts periodic, unscheduled observation of these interactions as a quality control measure. When warranted, unusual, or questionable behaviors occur, there will be a review which will be recorded in the Center's personnel files (HR Ofc).

- The Center evaluates the level of risk by considering the location and time of day of each activity. Whenever possible, activities and programs will take place in open, visible, and well-lit buildings and outside areas in which multiple people can view activities.
- SJA provides academic tutoring. Computers are kept in an open lab area. Staff and volunteers will closely monitor youth's use of the Internet. As a minimum, youth will be:

- instructed on not sharing personal information with strangers, posting on websites, and cautioned about the use of social networking
- required to advise SJA staff or volunteer if he or she receives sexual emails or other online messages
- required to sign an agreement that they will comply with all Internet safety guidelines established by SJA.
- Privacy is essential when youth, employees, and volunteers are toileting, and changing clothes, unless youth require special supervision for such activities.
- In the case of an organized athletic activity or fieldtrip, two or more adults will be required for chaperoning youth. The ratio of adults to youth will be at based on the activity, ages of youth, and the level of risk.
- Transportation policies and procedures limit one-on-one situations. Specific directives for transporting youth to and from regular activities and special events are provided in the SJA Employee and Volunteer Handbook.

### **Critical Strategies for Ensuring Safe Environments**

SJA ensures safety through enhanced visibility of spaces that are open and visible to multiple people, along with the assurance of privacy, when appropriate. Strategies employed to provide youth a safe environment:

- Center is landscaped to ensure open, visible spaces with no concealment.
- Areas not used for programming are secured to prevent youth from being isolated.
- All doors in youth program areas have windows.
- Bright lighting is available in all areas.
- Privacy is provided for toileting in the Academy.
- Off-site adult supervision is enforced with appropriate ratios of adults to youth.
- Procedures are established regarding access control for admitting and releasing youth.

#### **4. Monitoring Behavior**

***Goal: to prevent, recognize, and respond to inappropriate and harmful behaviors and to reinforce appropriate behaviors.***

SJA uses formal and informal supervision to observe, monitor, and document staff and volunteer interactions with youth. For such supervision and documentation to take place, staff and volunteers are made aware of their defined roles and responsibilities. Staff and volunteers will follow the SJA protocol in promptly responding to and reporting of inappropriate or harmful behavior, potential risk situations, and boundary violations. Further directives are provided in the training section.

#### **5. Responding to Inappropriate Behavior, Breaches in Policy, and Allegations and Suspicions of Child Abuse** ***Goal: to respond quickly and appropriately to inappropriate or harmful behavior, infractions of child abuse prevention policies and procedures, and evidence or allegations of child abuse.***

SJA staff and volunteers are required to know the policies and procedures for reporting suspected abuse, including to whom and in what format reports are made. This is covered in the required orientation for new employees and volunteers and is provided annually for ongoing employees and volunteers. A Mandated Reporting workshop is offered annually or more often when needed.

According to Wisconsin state law, professionals that work with children, including Center staff and volunteers, are mandated reporters of child abuse and neglect. Refer to:

<http://www.childwelfare.gov/systemwide/law-policies>.

- SJA staff and volunteers must know the inappropriate/harmful behaviors that require internal response. Examples of verbal communication and physical behavior are presented in this document in the ***Guidelines on Interactions Between Individuals*** section.
- Inappropriate/harmful behaviors, regardless of the severity, must be reported on an ***Incident Report*** form by the staff or volunteer who first learn of the abuse. The staff member or volunteer will not investigate allegations or conduct their own investigations. The Incident Report must include the nature and extent of the abuse, the alleged perpetrator, and other relevant information. The SJA Incident Report typically includes:
  1. name, age, and address of the child
  2. names and addresses of alleged abuser, parents and other caregivers
  3. specific allegations, description of the injuries
  4. witnesses and contact information
  5. abuser's current access to the child
  6. condition of the child (is the child alone or in need of medical treatment?)
  7. description of alleged abuse provided by adult and child
  8. abuser's current mental, emotional or physical state
  9. location of the child
  10. concerns about the child's location (for example, are there weapons or dangerous animals?)
  11. actions already taken by you or other professionals
  12. your name – while you will generally remain anonymous, it is helpful if the caseworker has a way to contact you for additional information
- Staff or volunteer reporting the initial allegation will submit the Incident Report form to SJA Administrator prior to reporting to authorities. SJA guidelines require the reporting staff or volunteer contact their Supervisor within 24 hours. If the situation appears to be an emergency (Imminent danger to the child) and a supervisor cannot be reached, immediately contact the Bureau of Milwaukee Child Welfare and the police department.
- The Incident Report and related documentation will be kept confidential and maintained in the SJA personnel cabinet with limited access.
- SJA recognizes that child abuse is a crime. If an allegation appears justified, a formal report will be completed by the administrator, who is professionally and legally accountable for ensuring that all cases of abuse are reported to the proper authorities.
- Prior to submitting the report of suspicion or allegation to authorities, the Administrator may ask for clarification using open-ended questions such as *"Are you comfortable telling me what happened?"* Staff and volunteers are requested to minimize contaminating the child's memory and have the investigation conducted by a trained professional. Always support the child and reassure that it is not the youth's fault and that the SJA job is to protect youth.
- A direct-line is required to help expedite the process and minimize the number of times a youth has to repeat allegations. The teacher will write a summary and submit a copy to the Administrator. This copy will be maintained in the locked personnel file cabinet.
- Specifically, the formal report will be made to authorities of the appropriate outside agency. SJA reports:
  - All child abuse cases to the: **Bureau of Milwaukee Child Welfare - 414/220-7233**
  - In addition, sexual assault cases to the: **Milwaukee County Police Department - 414/935-7405**
  - In the case of a child abuse or sexual assault emergency - **911**

**CONFIDENTIALITY** is crucial in cases of child abuse. SJA's confidentiality policy is consistent with state legal requirements which includes withholding the names of potential victims, the accused perpetrator, the individual



who made the report to authorities, and reporting the case only on a need to know basis to the appropriate individuals.

#### Responses to Cases of Child of Abuse

- An allegation does not equate to guilt. However, SJA must take steps to protect the youth in its care. Immediately after the report of the case to external authorities, if the alleged offender is an employee, he/she will be placed on suspension until the case is resolved legally. SJA has an appeal process in which individuals found not guilty of abusive behaviors may apply to return to their former program.
- SJA, when appropriate, provides referrals for victims and their families to child abuse organizations, therapists or support groups.
- National resources include:
  - Prevent Child Abuse America, 1-312-663-3520, [www.preventchildabuse.org](http://www.preventchildabuse.org)
  - Childhelp USA® National Child Abuse Hotline, 1-800-422-4453, [www.childhelpusa.org](http://www.childhelpusa.org)
  - U.S. Department of Health & Human Services, 1-800-394-3366, <http://nccanch.acf.hhs.gov>
- The Center also offers referrals for agencies that deal with a restorative justice approach. Southeastern Wisconsin centers include:
  - Wisconsin Community Services, Inc. at 414-290-0400
  - Marquette University Law School at 414-288-7090
  - Community Conferencing Program at 414-278-4644

#### 6. Training for Child Abuse Prevention

**Goal: to provide program staff and volunteers with information and skills to help them prevent and respond to child abuse.**

SJA child abuse prevention training includes education on rights and responsibilities of staff, volunteers, and youth. Certified instructors provide specific guidelines and offer opportunities to problem-solve potentially risky situations. The objective is to equip adults and youth with the knowledge and skills to be proactive. The Center strives to create a safe, healthy, and respectful environment. Accordingly, trainees are required to follow the child abuse prevention policies and procedures in order to safeguard the children and youth in our care.

Training is conducted by professionals from the Training Bureau of Child Welfare. Training is conducted in an interactive approach, in which trainees are encouraged to ask questions and request clarifications relevant to the training materials or their experiences. In addition to the initial formal training session, questions or concerns can be raised at the monthly staff meetings or as they occur.

#### Summary of Training Content for Staff and Volunteers

As caretakers and protectors of youth at SJA, staff and volunteers will participate in child abuse prevention training. Training includes:

- Definitions of child abuse and neglect, and a continuum of appropriate, inappropriate and harmful behaviors
- A description of risk and protective factors

- Rules for personal conduct, dealing with risky or compromising situations, and the responsibility of staff and volunteers to act when they learn about inappropriate or harmful behavior
- Education on the healthy development of youth, and the responsibility of all staff and caregivers to support healthy development
- Developing a balance between providing a nurturing environment and maintaining policies and procedures to prevent child abuse
- Specific information about child sexual abuse, making clear that the majority of cases of sexual abuse involve an abuser with whom the child is familiar, such as a previously well-trusted caregiver
- Handling disclosures of inappropriate/harmful behaviors, reporting child abuse allegations, and dealing with the alleged perpetrator

### Training Parents, Guardians, and Caregivers

SJA encourages all parents, guardians and caregivers to participate in a free 2 1/2 hour **“Awareness to Action, Stewards of Children”** training. SJA provides parents and guardians a community resource list which encourages outreach for support and education, including a parent hotline, Parent Helpline 414-671-0566 and Milwaukee’s IMPACT 211. The Center maintains and distributes literature and announcements detailing available parenting classes, workshops, child advocacy efforts, and community forums.

### Training Youth

All youth are required to participate in wellness training to help teach appropriate behavior and protective skills. Training is offered for the age-specific developmental level and communicated in age-appropriate language. Content of the training generally includes age specific information about healthy behaviors/relationships versus inappropriate or harmful behavior/relationships. In addition, training covers the value of setting personal physical boundaries, being treated with respect, and treating others with respect, and how each person is responsible for his or her behavior. Youth are taught the importance of reporting and the procedure for reporting abuse. This includes advising youth how to seek assistance or report abuse: to a staff member or volunteer, to another youth at SJA, or to someone at an outside organization.

- Youth training materials may include colorful, developmentally-appropriate workbooks which are shared with the youth’s parent or caregiver. Content promotes healthy attitudes and behaviors.
- SJA promotes a united front in protecting youth from abuse. Parents and caregivers are encouraged to be open and honest with their youth in general communication. Healthy family communication in a nurturing environment is a strong protective factor.

### **SUMMARY**

Child abuse is a complex issue that can have long-term consequences. SJA is privileged in the role of nurturing and caretaking of youth. In that role we strive for healthy environments for every young person in our care and beyond.

If there is a recommendation or concern that we can further address to ensure the well-being of these youth, please contact the Director(s) at 414 – 645 – 5337.

Approved by: Tabari Jones  
President/CEO

Date: 2/9/2021

**St. Joseph Academy, Inc.**

**CERTIFICATION and ACKNOWLEDGEMENT**

I have read and understand this document describing the **POLICIES AND PROCEDURES TO PROTECT CHILDREN AND YOUTH FROM ABUSE AND NEGLECT**. I understand that these apply to my employment, that I am a mandated reporter, and that I must follow all Laws, Regulations, Policies, Standards of Conduct and Code of Ethics to ensure that children are always safe when in my care.

\_\_\_\_\_ Employee Signature

\_\_\_\_\_ Printed Name

\_\_\_\_\_ Position

\_\_\_\_\_ Date

The Human Resources Director of SJA, Inc. is responsible for ensuring that all employees have signed this "Certification and Acknowledgement" form regarding the document. Signed forms are kept on file in the Human Resources office at SJA.