

General Church Committee Helping Children In Crisis: Procedure Outline.

Caregiver Responsibilities and Reporting Standards	1
Committee Oversight, Risk Management and Enforcement Procedures	4
Fundraising Programs and Procedures	9
Child Protection Policy	11
Conflict of Interest Policy	18
Whistle Blower Policy	21

Caregiver Responsibilities and Reporting Standards

Rationale

In order for the mission of the Helping Children in Crisis committee to be carried out successfully a strong relationship must exist between the committee and those receiving resources to care for the children (caregivers). If the mission could be completed by a relatively small team then our personal relationships and trust alone would probably be enough to provide adequate mental, physical and spiritual care for the children. However, that is not the case. Collectively we must rely on the support and generosity of donors. Those donors could be friends and neighbors in the General Church or they could be businesses, individuals or faith-based organizations outside of the Church. Whoever decides to support this wonderful cause must be assured that we all will be using their generous gifts according to our mission and their mutual wishes. It is for this reason that caregivers must comply with a published set of reporting and documenting standards and the committee must consistently enforce those standards. Without this process our potential donors cannot be assured that their funds will be used in accordance with the HCIC mission. At the same time adhering to a published set of standards will remove ambiguity from the process, allowing caregivers to know exactly what steps they must take to secure resources, funding and support for children under their care.

Documentation

A large part of assuring donors that their funds are being utilized appropriately is achieved through documentation. That does not mean all caregivers will be expected to comply with standards

present in the United States. It does mean, however, every effort possible must be made to document and verify all cost estimates. HCIC will provide training and resources to assist with the development of this capability for any caregiver who requires it, but the responsibility lies with caregivers to provide documentation to support any and all estimates provided to the committee with the intent of receiving funds from HCIC. If documentation is extremely difficult to produce the caregiver must demonstrate an equivalent level of diligence approved by the committee before any acceptance of cost estimates can be considered. Awarding of funds for estimates void of documentation will require a unanimous committee vote.

When documentation of a cost is difficult to furnish caregivers should consider the following sources for assistance; local government officials, local branches of non-governmental organizations or charities that have similar missions, and local members of the Church whose occupation is in the same field as products or services in need of cost estimates and documentation. Additionally, caregivers are encouraged to demand receipts or documentation of receipt of a product or service in order to act as a cost verification for the future. For example if school supplies are purchased request a document stating the price paid from the merchant or vendor. This receipt can act as documentation for a future estimate of school supplies if documentation is difficult to produce. The HCIC executive committee will also utilize outside contractors or advisers to provide a separate verification of cost estimates where appropriate. These contracted individuals may be required to interact with caregivers of the children and should be considered an extension of the HCIC executive committee.

The committee understands that a documentation requirement may be inconvenient for caregivers and appear to get in the way of providing the children with the immediate care they need. The reality, however, is that documentation is necessary to secure donations and while it may not be the standard in regions receiving funds from HCIC it is the standard where those funds are originating. The committee will work closely with all caregivers to ingrain documentation procedures in their daily routine and interactions with HCIC.

Third Party Verification and Three Source Bidding

Documentation is a fundamental part of cost verification, but it does not make up the entire responsibility of caregivers to conduct due diligence in all things. Another critical part of verifying costs, particularly on items of great value, is obtaining estimates from multiple independent sources or Third Parties (the caregiver representing the first party and the committee representing the second party). For example if a caregiver desires to purchase a van to transport children for educational trips he or she must secure documentation for cost estimates from three different van sellers. Or if a caregiver desires to build a small storage building for food items they must obtain multiple bids from contractors who could perform the construction. The bids like the cost of the van must be documented and signed by the contractor or seller of the van. Only then can the committee accept the estimate as having completed the required due diligence. Three bids or estimates must be documented for any item or service over \$4,000 USD and when that level of documentation cannot be furnished the committee must vote unanimously for disbursement of funds, documenting the decision in minutes and program reports which will be made available to the General Church and donors.

Government Compliance

Every effort should be made to comply with all Kenyan government standards both local and national. HCIC encourages and supports constant communication and the fostering of a strong relationship with government officials whenever related to the mission. The Kenyan government can be a good source for assistance with cost verification & documentation and may be able to assist with the bidding process when necessary. Government officials should not be considered the only source of cost verification but when other verifiers are absent may be a reliable alternative.

Summary

The partnership between the caregiver and the HCIC committee is absolutely critical. That team must represent the mission-in-action and adhere to all the standards donors expect. This is the foundation of our risk management and core of our code of conduct. We cannot gain credibility without demonstrating adherence to our standards and without credibility we cannot raise the funds the children need. It is for these reasons that standards of documentation, verification and multiple estimates are put in place.

Caregiver Checklist

1. When developing budgets obtain documentation for all cost estimates.
2. When documentation is difficult to obtain notify the committee and seek assistance from local entities: government, non-governmental organizations, charities, church-members.
 - a. Train vendors who you will do business with frequently to provide receipts and cost estimates.
3. When budgeting for an item or service greater than \$4000 USD inform vendors, merchants or service-providers that they must provide signed estimates.
 - a. Obtain at least three separate signed estimates for an item or service over \$4000 USD.
 - b. If estimates are unavailable inform the committee and begin to plan for other options where documentation is available.
4. Save copies (paper or electronically) of all estimates, receipts or cost documentation. They may be reused in the future and add the quality of future estimates.
5. If you have any questions ask the committee. The committee can provide training on records keeping and documentation as well as recommend processes for organizing and storing documents securely.

6. When the executive committee contracts an outside party to assist with cost verification cooperate fully and communicate openly.

Glossary of Terms

Documentation - Any written or typed record of costs associated with the care of the children, buildings, supplies, medicine, food or other materials necessary for proper care.

Third Party Verification – A method for confirming the accuracy of cost estimates. Any credible person or organization not related or associated with HCIC, the Sacred Heart Orphanage or the General Church can provide this verification as long as it is in writing.

Three Source Bidding – Before funds can be sent for a major project at least three separate service providers or contractors must be consulted to ensure the cost estimates are in line with the current, local market value for their products or services.

Committee Oversight, Risk Management and Enforcement Procedures

Rationale

The HCIC committee exists to facilitate the care of children in crisis by creating an organization to connect those in need with the resources and people that can help. It is therefore incumbent on the committee to provide the oversight, due diligence and risk management necessary to protect the children, donors, caregivers, volunteers, committee members and General Church from any wrong doing. This means whenever possible reducing ambiguity through clear policies, upfront communication and steadfast enforcement. While it may feel uncomfortable to deny funds for something as basic as clothing in an instance where estimates cannot be verified that level of enforcement of our standards could very well protect a child from potential abuse or neglect in the future. At the same time consistent enforcement empowers caregivers by clearly stating expectations while assuring donors their gifts are being used according to their wishes.

We must foundationally acknowledge that children who are in crisis situations live in conditions where information is imperfect and risk abounds. If that were not the case the children would likely not be in crisis, so the very name of our organization denotes the inherent risk we face in undertaking this use. We must tackle this reality head on with professional, tested and proven best practices that effectively reduce risk through diligent oversight and policy enforcement. We must embrace the tenants of transparent communication and collective resourcing to serve the needs of these children. And we must establish credibility among all stakeholders in order to develop sustainable funding models for the children in crisis in Kenya today and anywhere tomorrow.

Whenever possible, HCIC should seek involvement with local and national government officials as an added layer of risk mitigation. Already officials have shown interest in communicating with the committee and helping verify the care of the children. It is likely that Kenyan government officials are aware of their need to improve stability and the rule of law to encourage foreign direct investment. Our mission and their goals are not misaligned and HCIC should seek to partner with officials whenever practical and always comply with local laws and regulations.

Enforcement

As mentioned in the Caregiver's Responsibilities section the committee bears the responsibility of enforcing compliance with standards by all caregivers receiving funds from HCIC and its donors. The committee is in the unique position of representing both the needs of children in crisis and assuring donors that their gifts are used according to the mission, and while these stakeholders are not at odds conditions that surround them may be. Therefore the committee must strive to reduce ambiguity whenever possible through clear communication of expectations and consistent enforcement of policies. To that end it should be abundantly clear to all stakeholders that if costs are not documented and verified in accordance with the standards put forth in this document then funds will not be sent.

The HCIC executive committee realizes that certain skills may need to be developed in order for caregivers to meet the standards put in place. For that reason the executive committee will consider the 60 days following presentation of these documents to the caregivers in Kenya a training period. The responsibility to effectively and clearly communicate the intent and requirements of these policies to those expected to comply with them is strictly the responsibility of the executive committee and should be completed in that first 60 days. If a working understanding and operational capacity to meet the enforcement standards are not achieved in 60 days then the executive committee should reassess the viability of the situation in Kenya and report its findings to the Office of Outreach and the General Church. At that point a more detailed legal review of the risk associated with continuing support should be conducted. At the same time the first 60 days should provide opportunities for caregivers to exercise and practice these policies in an environment where they are not penalized for making mistakes. This does not mean the documentation and verification standards will not be enforced, but executive committee members should consider the learning curve associated with the caregivers learning how to comply when casting their votes on funding enforcement items in the first 60 days.

The critical elements of enforcement are due diligence in cost documentation and verification through bidding and comparables. Every effort must be made to comply with HCIC standards in these areas and when necessary funds must be denied to encourage compliance. Decisions to deny funding will take fortitude and a long view but without them HCIC will be accepting risks that are uncontrollable. Conversely, if standards are enforced, ambiguity reduced and communication clear risk can be effectively managed and reduced to acceptable levels.

As mentioned above the committee must unanimously vote to authorize release of funds over \$4000 USD when documentation and verification standards are not met. This decision must be documented and shared with stakeholders. Most importantly this decision should not be made without

careful inspection of all details regarding the specific case by the committee. It is important to note that despite the dire conditions of the children we seek to serve rarely will the committee be faced with a life and death scenario. In that situation some extra risk may be deemed acceptable due to the extent of need, but in the vast majority of situations where standards are not met by caregivers life will not be in danger. This dose of perspective is vital to safeguard the future health of the children and HCIC from uninformed decisions on immediate needs.

Performance Measurement

To facilitate continuous improvement the executive committee should track, measure and report performance on a series of metrics designed to guide execution. Data should be compiled on a tri-annual basis to coincide with the school terms in order to track performance in the following areas:

Well Being of the Children

- Instances of sickness, measures taken to remedy & outcomes
- Instances of behavioral issues, measures taken to remedy & outcomes
- Instances of academic challenges, measures taken to remedy & outcomes
- Percentage of instances where resources in place to address needs

Oversight

- Percentage of estimates with documentation
- Number of exceptions requiring executive committee vote
- Number of exception votes unanimously passed

Fundraising and Outreach

- Number of donors outside the Church
- Number of donors who are members of the Church
- Dollar amount raised
- Number of volunteers outside of the Church

Online Performance

- Number of shares or likes of content on Facebook, Twitter
- Number of online donations
- Percentage of total donations made online

The executive committee officers will be responsible as a team to furnish the data required to track the above information, but the Oversight Officer will be responsible for collating and reporting results to the committee quarterly. Performance trends should be observed and plans put in place to improve negative trends where ever they exist.

Training and Mentoring

The standards set in these documents will almost certainly be considered too rigid by caregivers in developing regions. In many cases the technology and education are not in place to comply with the level of documentation and verification we have outlined. However, the rigidity of our standards is put in place to protect the caregivers as well as the children and donors. It is therefore the responsibility of the committee to facilitate caregiver compliance with whatever training and mentoring possible.

Expenditures for formal training of caregivers on accounting, budgeting and project management should be considered by the committee in addition to training focused on providing physical, mental and spiritual care for children. Additionally, mentors within the committee and out should be identified and utilized for caregivers whenever possible.

At the same time if committee members are in need of training and mentoring their needs should also be addressed within the program management. As with all HCIC activities these initiatives should be carefully considered and documented.

Communications, Reporting and Feedback

The committee will report progress to stakeholders at a minimum on a tri-annual basis. The board of the General Church Sacred Heart orphanage will report to the HCIC executive committee on a tri-annual basis and after each report the HCIC executive committee will provide feedback in writing on how the relationship is progressing. Costs will be considered when determining the medium used for these reports, but care should be given to highlight progress as well as challenges and committee votes on situations not in compliance with standards.

These communications allow stakeholders to interact with the committee and provide feedback. Feedback is critical to HCIC's continuous improvement and serves as an important aspect of risk management. The capabilities and time of the committee to address and identify every issue where risk may arise is finite. However, interactions through reporting and feedback with stakeholders serve as capability multipliers, extending the reach of HCIC's organizational competence. Observations, comments and recommendations from stakeholders, donors and members of the General Church organization should be sought and incorporating in all HCIC execution planning.

Lessons Learned and Continuous Improvement

In order to continuously improve HCIC will consistently evaluate performance in areas of oversight, risk management, policy enforcement and fundraising. This process will identify strengths and weaknesses, allowing the committee to put measures in place to fix problems while learning from them. Loving Arms Mission (another New Church faith-based organization) has offered guidance and advice learned from their experience in Kenya which the HCIC committee has incorporated into these policy documents. In the future both organizations will have the opportunity to share experiences in an effort to help each other advance their missions and grow. The following short case studies are entered as reminders to the HCIC committee, donors, volunteers and caregivers of what can happen when the mission is not served with diligence, persistence, transparency and integrity.

Case Study on Transparency: Greg Mortenson's Central Asia Institute (CAI)

Greg Mortenson is an American humanitarian, professional speaker, writer, and former mountaineer. He was the co-founder and former executive director of the non-profit Central Asia Institute as well as the founder of the educational charity Pennies for Peace. In support of the Central Asia Institute's mission to build schools for children in Afghanistan and Pakistan Mortenson published

several books documenting his formative experiences in the Hindu Kush mountains that brought him to create CAI.

After over a decade in pursuit of his mission Mortenson came under fire from CBS' 60 Minutes and writer Jon Krakauer (*Into Thin Air*) for perceived inaccuracies in his books as well as financial improprieties regarding their proceeds. A handful of class action lawsuits were filed but eventually dismissed. However, an investigation by the Montana Attorney General found Mortenson had misspent \$6 million of the book proceeds and ordered him to repay \$1 million to CAI. While it was ruled that no laws were broken Mortenson and the CAI's reputations were severely tarnished bringing the future of CAI and its mission into doubt.

Case Study on Oversight: Oprah Winfrey's Leadership Academy in South Africa.

Oprah Winfrey's Leadership Academy for Girls was founded by Oprah to provide educational and leadership opportunities for academically gifted girls from impoverished backgrounds in South Africa.¹ However, shortly after its opening in 2007 a female matron on the school staff was accused of physical and sexual assault on several girls attending the school. Police charged and arrested the women after seven different students submitted statements of abuse.

Oprah Winfrey is one of the most recognized and influential personalities in modern culture. Her resources and personal networks are vast and among the best equipped to pursue such an undertaking. Yet despite all this capability children were still subject to abuse. No organization is immune from corruption or malicious behavior and as result every effort must constantly be given to provide oversight and policy enforcement.

¹ Official website of OWLA

Fundraising Programs and Procedures

HCIC will pursue funds through three distinct programs; Sponsorship, Individual Gifts, and Events. The goals of fundraising can also be separated into three distinct buckets; operating funds (dormitories, school materials, etc.), re-occurring basic needs (clothing, nutrition, medicine, etc.) and funding sustainability (principle to start an endowment or investment fund). All funding programs will be supported by the Donor Care and Appreciation Program which will provide follow up, progress reporting and contact information maintenance for all donors. Lastly, HCIC will consider partnering with caregivers on business development initiatives to help individual missions become self-sufficient and sustainable through the Business Development Program.

Sponsorship Program

The Sponsorship Program is based on a successful revenue model used by non-profits for decades. However, HCIC's program will seek to build on the traditional "for \$2.19 a day you can save a child" approach. In addition to an individual, family or group of friends providing sponsorship of a child or several children we intend to seek support from New Church societies. Several Church congregations have shown interest and represent a crowd-sourcing approach to fundraising. By broadening the base of support through Church congregations HCIC will diversify funding sources, improving the long-term prospects for sustainable funding. Program management will be delegated to a director who will report to the executive committee and have authority to create a sub-committee of the HCIC to support program management.

A critical part of success in the Sponsorship Program and other funding programs will be HCIC Ambassadors. The Sponsorship Program Director will be responsible for establishing, maintaining and growing a network of ambassadors to represent the HCIC and increase awareness of the mission. These individuals may be in Church societies, businesses, clubs, or among groups of friends and colleagues. Social networking will be a vital tool of the ambassadors who will be critical to help create content for an HCIC website and social presence. The director should coordinate messaging with the Communications Officer and assure that all information used by Ambassadors is accurate and approved by the executive committee. The Director should mentor ambassadors and in addition to raising awareness and social media buzz to drive website traffic the director should continually focus on transitioning interest and awareness into commitments for gifts.

Individual Gifts Program

The New Church has a tremendous history of generosity in charitable pursuits. And while the world outside of the Church is full of credible organizations for philanthropic individuals to give to, HCIC is committed to making a good, credible case for why this mission is important and this organization is worthy. In fact an important goal of the Individual Gifts Program and HCIC is to extend beyond individuals and families in the Church and to practice Outreach. Through superior program management, commitment to oversight and enforcement HCIC will strive to achieve a level of credibility

that will encourage stakeholders to introduce portions of their personal networks not familiar with the New Church to HCIC, the children it serves and the Church.

While all stakeholders play a role in identifying and reaching out to individuals interested in supporting the mission of HCIC, the Executive Committee Chair will be responsible for coordinating communication with individual donors upon their request. The chair can designate a sub-committee to support this role, but overall care of donors lies with the Chair or Individual Gift Program Director. The needs of donors in the Individual Gifts Program reveal a secondary benefit of competent risk management, oversight, due diligence and policy enforcement which achieve the capability and professionalism expected by those unfamiliar with the New Church.

Events Program

The Events Program is primarily designed to raise awareness and create original content to be shared through social networking in order to drive traffic to HCIC donations links. The overhead associated with traditional fundraising events can severely diminish their profitability. However, by designing events in engaging settings with compelling content attendees will share their experiences and upload self-created content reducing the HCIC expenditure on advertising and content development. The crowd-sourcing model also applies to collateral development for the website and social media sites which the Events Program is critical to facilitate.

Due to the strong link between awareness events and HCIC's online presence the Communications Officer is designated the Events Program Director. This role can be delegated and a sub-committee formed by the Communications Officer to support execution of the program, but the Communications Officer should maintain oversight of all events and content created.

Donor Care Program

For every donation received HCIC should follow up and formally thank the supporter. This program also will enable HCIC to maintain current contact information for donors and volunteers, allowing HCIC to communicate progress reports and updates. The Financial Officer will assume the role of Donor Care Program Director and can delegate as well as establish a sub-committee as needed. However, the Financial Officer should maintain oversight for timely follow up and records keeping of all donors.

There is a giving season for philanthropy and donor fatigue can be very real. It is the responsibility of the Donor Care Program Director to be sensitive to demands on donors' time and resources. HCIC must seek to update more than ask, report more than require and appreciate more than assume. The ideal state for Donor Care would be to never initiate communication with a request, but rather let the program results, awareness and reputation move donors to give without solicitation. This is a lofty goal and one the Donor Care Director should continually encourage HCIC to aspire to.

Business Development Program (Future Aspiration)

In order to support the sustainability of HCIC efforts in the future the executive committee will have a goal to establish and maintain a Business Development Program. The Business Development Program will play a critical role in allowing HCIC to move from mission to mission. The underlying goal of the program will be to support financial independence and sustainability for every mission HCIC supports. Responsibility for the program will lie with the Oversight Officer who will act as director. The role of director can be delegated and a sub-committee established by the Oversight Officer if necessary.

In order to plan for successful ventures the Business Development Director must build relationships with institutions and individuals with the training and resources to effectively consult on international and startup development. When appropriate the director should seek to partner with Bryn Athyn College and consider supporting a business development incubator in conjunction with the business curriculum at BAC. Additionally, the HCIC should leverage their donor network to identify individuals interested in supporting startup ventures aimed at achieving sustainability for HCIC missions.

A second order effect of a successful business development initiative in Kenya may be added practical education and skill development for the orphans themselves. If an opportunity arises to augment their education with job-related training the committee should consider the opportunity as an aspect of investment in self-sufficiency of the orphanage itself.

Child Protection Policy

HCIC is committed to practice which protects children from harm. Officers, volunteers and caregivers in HCIC must accept and recognize responsibilities to develop awareness of the issues which cause children harm. This policy is intended to be adhered to strictly by officers and volunteers but more importantly to be a guide and set of standards for caregivers and anyone serving the use of caring for children in crisis. This policy is not in place of but in addition to the General Church policy for employees regarding Child Protection.

This policy is based on the following principles:

- The welfare of the child is paramount;
- All children, whatever their age, culture, disability, gender, language, racial origin religious beliefs and/or sexual identity have the right to protection from abuse;
- All suspicions and allegations of abuse will be taken seriously and responded to swiftly and appropriately;
- All staff (paid/unpaid) have a responsibility to report concerns to the Designated Person with responsibility for child protection.
- Staff/volunteers are not trained to deal with situations of abuse or to decide if abuse has occurred.

We will aim to safeguard children by:

- Adopting child protection guidelines through procedures and a code of conduct for officers, volunteers and caregivers.
- Sharing information about child protection and good practice with children, officers, volunteers and caregivers.

- Sharing information about concerns with agencies who need to know, and involving children appropriately.
- Carefully following the procedures for recruitment and selection of staff and volunteers.
- Providing effective management for staff and volunteers through support, supervision and training.
- We are committed to reviewing our policy and good practice regularly.

This policy sets out agreed guidelines relating to the following areas:

- Responding to allegations of abuse, including those made against staff and volunteers
- Recruitment and vetting of staff and volunteers
- Supervision of organizational activities

1. Definitions of Abuse

These definitions are based on those from Working Together to Safeguard Children (Department of Health, Home office, Department for Education and Employment, 1999)

Physical Abuse

Physical abuse may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing harm to a child.

Physical harm may also be caused when a caregiver feigns the symptoms of, or deliberately causes ill health to a child whom they are looking after. This situation is commonly described as factitious illness, fabricated or induced illness in children or “Munchausen Syndrome by proxy” after the person who first identified this situation.

A person might do this because they enjoy or need the attention they get through having a sick child.

Physical abuse, as well as being the result of a deliberate act, can also be caused through omission or the failure to act to protect.

Emotional Abuse

Emotional abuse is the persistent emotional ill treatment of a child such as to cause severe and persistent adverse effects on the child’s emotional development. It may involve making a child feel or believe they are worthless or unloved, inadequate or valued only insofar as they meet the needs of the other person.

It may feature age or developmentally inappropriate expectations being imposed on children. It may also involve causing children to feel frequently frightened or in danger, or the exploitation or corruption of a child.

Some level of emotional abuse is involved in all types of ill treatment of a child, though it may occur alone.

Sexual Abuse

Sexual abuse involves forcing or enticing a child or young person to take part in sexual activities, whether or not the child is aware of, or consents to, what is happening. The activities may involve physical contact, including penetrative acts such as rape, buggery or oral sex, or non-penetrative acts such as fondling.

Sexual abuse may also include non-contact activities, such as involving children in looking at, or in the production of, pornographic material or watching sexual activities, or encouraging children to behave in sexually inappropriate ways.

Boys and girls can be sexually abused by males and or females, by adults and by other young people. This includes people from all different walks of life.

Female Genital Mutilation

Of particular concern in Africa is the existence of Female Genital Mutilation (FGM). This practice is prevalent in Kenya but will not be tolerated in any situation where a child is a recipient of resources from HCIC. If any individual is found subjecting a child to FGM, HCIC will immediately terminate their association and relationship with that individual. With all situations where abuse might exist and if appropriate, legal action and damages for the child will be sought.

Neglect

Neglect is the persistent failure to meet a child's basic physical and or psychological needs, likely to result in the serious impairment of the child's health or development. It may involve a caregiver failing to provide adequate food, shelter and clothing, leaving a young child home alone or the failure to ensure that a child gets appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

It is accepted that in all forms of abuse there are elements of emotional abuse, and that some children are subjected to more than one form of abuse at any time. These four definitions do not minimize other forms of maltreatment.

2. Recognizing and Responding to Abuse

The following signs may or may not be indicators that abuse has taken place, but the possibility should be considered.

Physical signs of abuse

- Any injuries not consistent with the explanation given for them
- Injuries which occur to the body in places which are not normally exposed to falls or games
- Unexplained bruising, marks or injuries on any part of the body
- Bruises which reflect hand marks or fingertips (from slapping or pinching)
- Cigarette burns
- Bite marks
- Broken bones
- Scalds
- Injuries which have not received medical attention
- Neglect-under nourishment, failure to grow, constant hunger, stealing or gorging food, untreated illnesses, inadequate care
- Repeated urinary infections or unexplained stomach pains

Changes in behavior which can also indicate physical abuse:

- Fear of caregivers being approached for an explanation
- Aggressive behavior or severe temper outbursts

- Flinching when approached or touched
- Reluctance to get changed, for example, wearing long sleeves in hot weather
- Depression
- Withdrawn behavior
- Running away from home

Emotional signs of abuse

The physical signs of emotional abuse may include;

- A failure to thrive or grow particularly if a child puts on weight in other circumstances e.g. in hospital or away from care
- Sudden speech disorders
- Persistent tiredness
- Development delay, either in terms of physical or emotional progress

Changes in behavior which can also indicate emotional abuse include:

- Obsessions or phobias
- Sudden under-achievement or lack of concentration
- Inappropriate relationships with peers and/or adults
- Being unable to play
- Attention seeking behavior
- Fear of making mistakes
- Self-harm
- Fear of caregiver being approached regarding their behavior

Sexual Abuse

The physical signs of sexual abuse may include:

- Pain or itching in the genital/anal area
- Bruising or bleeding near genital/anal areas
- Sexually transmitted disease
- Vaginal discharge or infection
- Stomach pains
- Discomfort when walking or sitting down
- Pregnancy

Changes in behavior which can also indicate sexual abuse include:

- Sudden or unexplained changes in behavior e.g. becoming withdrawn or aggressive
- Fear of being left with a specific person or group of people
- Having nightmares
- Running away from home
- Sexual knowledge which is beyond their age or developmental level
- Sexual drawings or language
- Bedwetting
- Eating problems such as over-eating or anorexia
- Self-harm or mutilation, sometimes leading to suicide attempts

- Saying they have secrets they cannot tell anyone about
- Substance or drug abuse
- Suddenly having unexplained sources of money
- Not allowed to have friends (particularly in adolescence)
- Acting in a sexually explicit way with adults

Neglect

The physical signs of neglect may include:

- Constant hunger, sometimes stealing food from other children
- Constantly dirty or smelly
- Loss of weight or being constantly underweight
- Inappropriate dress for the conditions

Changes in behavior which can also indicate neglect include:

- Complaining of being tired all the time
- Not requesting medical assistance and/or failing to attend appointments
- Having few friends
- Mentioning being left alone or unsupervised

3. What to do if you suspect that abuse may have occurred

1. You must report the concerns immediately to the primary caregiver and Executive Committee Chair

The role of the designated person is to:

- Obtain information from staff, volunteers, children and caregivers who have child protection concerns and to record this information.
- Assess the information quickly and carefully and ask for further information as appropriate.
- They should also consult with a statutory child protection agency such as the local social services department or local government to clarify any doubts or worries.
- The designated person should make a referral to a statutory child protection agency or the police without delay.

2. Suspicions will not be discussed with anyone other than those nominated above.

3. It is the right of any individual to make direct referrals to child protection agencies. If for any reason you believe that the nominated persons have not responded appropriately to your concerns, then it is up to you to contact the child protection agencies directly or local government directly.

Allegations of physical injury or neglect

If a child has a symptom of physical injury or neglect the designated person will:

1. Contact Social Services for advice in cases of deliberate injury or concerns about the safety of the child. The caregivers should not be informed by the organization in these circumstances.

2. Where emergency medical attention is necessary it will be sought immediately. The designated person will inform the doctor of any suspicions of abuse.
3. In other circumstances speak with the caregiver and suggest that medical help/attention is sought for the child. The doctor will then initiate further action if necessary.
4. If appropriate the caregiver will be encouraged to seek help from Social Services. If the caregiver fails to act the designated person should in case of real concern contact social services for advice.
5. Where the designated person is unsure whether to refer a case to Social Services then advice from the Area Child Protection Committee will be sought.

Allegations of sexual abuse

In the event of allegations or suspicions of sexual abuse the designated person will:

1. Contact the Social Service duty social worker for children directly.
2. If the designated person is unsure whether or not to follow the above guidance then advice from the Executive Committee will be sought.
3. Under no circumstances is the designated person attempt to carry out any investigation into the allegation or suspicions of sexual abuse. The role of the designated person is to collect and clarify the precise details of the allegation or suspicion and to provide this information to Social Services whose task it is to investigate the matter under section 47 of the Children Act or local governments according to their laws.
4. Whilst allegations or suspicions of sexual abuse should normally be reported to the designated person, their absence should not delay referral to Social Services.

4. Responding to a child making an allegation of abuse

- Stay calm, listen carefully to what is being said
- Find an appropriate early opportunity to explain that it is likely that the information will need to be share with others-do not promise to keep secrets
- Allow the child to continue at his/her own pace
- Ask questions for clarification only, and at all time avoid asking questions that suggest a particular answer
- Reassure the child that they have done the right thing in telling you
- Tell them what you will do next and with whom the information will be shared
- Record in writing what was said using the child's own words as soon as possible, note the date, time, any names mentioned, to whom the information was given and ensure that the record is signed and dated

Helpful statements to make

- I believe you (or showing acceptance of what the child says).
- Thank you for telling me.
- It's not your fault.
- I will help you.

Do not say

- Why didn't you tell anyone before?
- I can't believe it!
- Are you sure that this is true?
- Why? Who? When? Where?
- Never make false promises.

5. What to do after a child has talked to you about abuse

The procedure

1. Make notes as soon as possible (ideally within 1 hour of being told) you should write down exactly what the child has said and what you said in reply and what was happening immediately before being told (i.e. the activity being delivered) You should record the dates, times and when you made the record. All hand written notes should be kept securely.
2. You should report your discussion with the designated person as soon as possible.
3. You should under no circumstances discuss your suspicions or allegations with anyone other than those nominated above.
4. After a child has disclosed abuse the designated persons should carefully consider whether or not it is safe for a child to return home to potentially abusive situation. On these rare occasions it may be necessary to take immediate action to contact Social Services to discuss putting safety measures into effect.

6. Recruitment and appointment of workers and volunteers

In recruiting and appointing workers caregivers should carry as many of the following as possible:

- Identify the tasks and responsibilities involved and the type of person most suitable for the job.
- Draw up the Selection criteria and put together a list of essential and desirable qualifications, skills and experience.
- All applicants should apply in writing and their application will cover their personal details, previous and current work/volunteering experience.
- Send a copy of our child protection policy with the application pack.
- Measure the application against the selection criteria
- Ask for photographic evidence to confirm the identity of the applicant e.g. their passport
- Request to see documentation of any qualifications detailed by the applicant.
- Interview candidates; ask for two references and a police check.
- Have at least two people from organization on the interview panel.
- Request two written references

7. Allegations against a member of staff

Assure all staff/volunteers that HCIC will fully support and protect anyone, who in good faith reports his or her concern that a colleague is, or may be, abusing a child. Where there is a complaint against a member of staff there may be three types of investigation:

- A criminal investigation,
- A child protection investigation,
- A disciplinary or misconduct investigation.

The results of the police and child protection investigation may well influence the disciplinary investigation, but not necessarily.

Conflict of Interest Policy

I. Purpose

HCIC encourages the active involvement of its officers, volunteers, and caregivers in the community. In order to deal openly and fairly with actual and potential conflicts of interest that may arise as a consequence of this involvement, HCIC adopts the following Conflict of Interest Policy.

II. Policy

Officers, volunteers, and caregivers are expected to use good judgment, to adhere to high ethical standards, and to conduct their affairs in such a manner as to avoid any actual or potential conflict between the personal interests of an officer, volunteer, or caregivers and those of HCIC. A conflict of interest exists when the loyalties or actions of an officer, volunteer, or caregiver are divided between the interests of HCIC and the interest of the officer, volunteer, or caregiver. Both the fact and the appearance of a conflict of interest should be avoided.

III. Definitions

Affiliated. Affiliation includes all direct and indirect financial interests between a officer, volunteer, or caregiver and a person with whom HCIC is considering entering into any transaction. It also includes any other interest that may influence the judgment of an officer, volunteer, or caregiver. An objective test is applied to determine whether an affiliation exists between the officer, volunteer, or caregiver and the other person: whether the involvement or relationship of the officer, volunteer, or caregiver with the other person is such that it reduces the likelihood that the officer, volunteer, or caregiver employee can act in the best interests of HCIC.

(Person means any individual, trust, estate, partnership, association, company or corporation.)

Substantial influence over HCIC. The following persons are deemed to have substantial influence over HCIC: each member of the Executive Committee; program directors, and such persons' spouse, ancestors, children, grandchildren, great grandchildren, brothers, sisters and the spouses of the children, grandchildren, great grandchildren, brothers and sisters; and an entity in which such persons hold more than 35 percent of the control. Furthermore, any person who met one of these definitions in the five years before the proposed transaction is deemed, for purposes of this Policy, to have substantial influence over HCIC.

IV. Procedures

Duty to Disclose

Each officer, volunteer, or caregiver shall disclose to the Executive Committee Chair all material facts regarding the affiliation of such officer, volunteer, or caregiver with any person with whom HCIC is

considering entering a transaction. The officer, volunteer, or caregiver shall make that disclosure promptly upon learning of the link between that person and transaction.

The Chair and any other person with substantial influence over HCIC shall disclose to the Executive Committee all material facts regarding his or her affiliation with any person with whom HCIC is considering entering a transaction. The Chair or person with substantial influence shall make that disclosure promptly upon learning of the link between that person and the transaction. If there is a question as to whether the officer, volunteer, or caregiver has substantial influence over HCIC, the Chair shall present this issue to the Executive Committee, and the Committee shall resolve the matter.

At any meeting of the Committee at which a transaction involving an affiliated person will be considered, a member shall disclose to the members of the committee all material facts regarding the member's affiliation with any person with whom the Committee is considering entering into any transaction.

Determining Whether a Conflict of Interest Exists

With regard to an officer, volunteer, or caregiver without substantial influence over HCIC, the Chair shall determine whether a conflict of interest exists.

With regard to the Chair, or a person with substantial influence over HCIC, the Committee shall determine if a conflict of interest exists.

After an affiliation disclosure by a member at a committee meeting, the member shall leave the meeting while the implications of the affiliation are considered and voted upon. The remaining Committee members shall determine if a conflict of interest exists.

Consequences of the Existence of a Conflict of Interest

With regard to an officer, volunteer, or caregiver without substantial influence over HCIC, the Chair shall decide the appropriate response by HCIC once a conflict of interest has been determined to exist. An officer, volunteer, or caregiver may appeal any adverse determination to the Committee.

With regard to the Chair or a person with substantial influence over HCIC, the Committee shall follow the procedures set forth in Article V in order to decide whether to enter into the transaction and, if so, to ensure that the terms of the transaction are reasonable.

In the case of a Committee member, if it is determined that a conflict of interest exists, the member shall leave the meeting while the transaction is discussed and shall not vote on it. The remaining members shall follow the procedures set forth in Article V in order to decide whether to enter into the transaction and, if so, to ensure that the terms of the transaction are reasonable.

V: Findings of the Committee

If the Executive Committee determines that a person with substantial influence over HCIC (such person) has a conflict of interest with regard to a transaction of HCIC, HCIC may engage in the transaction only if the following conditions are met prior to the transaction:

A. Such person shall disclose to the Committee all material facts concerning the person's affiliation with the transaction.

B. The Committee shall review the material facts. The transaction may be approved only if a majority of the members, not counting the vote of such person, concludes that:

(1) The proposed transaction is fair and reasonable to HCIC, and

(2) HCIC proposes to engage in this transaction for its own purposes and benefits and not for the benefit of such person, and

(3) The proposed transaction is the most beneficial arrangement which HCIC could obtain in the circumstances with reasonable efforts.

The minutes of any meeting at which such a decision is taken shall record the nature of the affiliation and the material facts disclosed by such person and reviewed by the Chair.

VI: Annual Statements

Each person who is deemed to have substantial influence over HCIC shall sign an Annual Disclosure Statement which affirms that the person has received a copy of this Conflict of Interest Policy, has read and understood the Policy, and has agreed to comply with the Policy, and discloses any direct or indirect affiliations.

All Annual Disclosure Statements shall be submitted to the Secretary of HCIC and filed with the minutes of the first meeting of the Executive Committee held each year.

VII: Remedies

Any member who fails to comply with this Conflict of Interest Policy may, in the discretion of the Executive Committee, be censured or be removed from the Committee. If an officer, volunteer, or caregiver who is deemed to have substantial influence over HCIC fails to comply with this Conflict of Interest Policy, he or she may be put on notice or terminated, in the discretion of the Executive Committee. Any other officer, volunteer, or caregiver who fails to comply with this Conflict of Interest Policy may be put on notice or terminated, in the discretion of the Chair.

VIII: Periodic Reviews

To ensure that HCIC operates in a manner consistent with its charitable purposes and its status as an organization exempt from federal income tax as a part of the General Church, the Committee shall authorize and oversee a periodic review of the administration of this Conflict of Interest Policy. The

review may be written or oral. The review shall consider the level of compliance with the Policy, the continuing suitability of the Policy, and whether the Policy should be modified and improved.

Whistleblower Protection Policy

A. Application. This Whistleblower Protection Policy applies to all of HCIC's staff, whether full-time, part-time, or temporary employees, to all volunteers, to all who provide contract services, and to all officers and directors, each of whom shall be entitled to protection.

B. Reporting Credible Information. A protected person shall be encouraged to report information relating to illegal practices or violations of policies of the Organization (a "Violation") that such person in good faith has reasonable cause to believe is credible. Information shall be reported to the General Church Liaison (the "Compliance Officer"), unless the report relates to the Compliance Officer, in which case the report shall be made to Executive Committee Chair which shall be responsible to provide an alternative procedure.

Anyone reporting a Violation must act in good faith, and have reasonable grounds for believing that the information shared in the report indicates that a Violation has occurred.

C. Investigating Information. The Compliance Officer shall promptly investigate each such report and prepare a written report to the Executive Committee. In connection with such investigation all persons entitled to protection shall provide the Compliance Officer with credible information. All actions of the Compliance Officer in receiving and investigating the report and additional information shall endeavor to protect the confidentiality of all persons entitled to protection.

D. Confidentiality. HCIC encourages anyone reporting a violation to identify himself or herself when making a report in order to facilitate the investigation of the violation. However, reports may be submitted anonymously by: filling out a "Whistleblower Reporting Form" and mailing it to the Compliance Officer. Reports of violations or suspected violations will be kept confidential to the extent possible, with the understanding that confidentiality may not be maintained where identification is required by law or in order to enable the Organization or law enforcement to conduct an adequate investigation.

E. Protection from Retaliation. No person entitled to protection shall be subjected to retaliation, intimidation, harassment, or other adverse action for reporting information in accordance with this policy. Any person entitled to protection who believes that he or she is the subject of any form of retaliation for such participation should immediately report the same as a violation of and in accordance with this policy.

Any individual within HCIC who retaliates against another individual who has reported a violation in good faith or who, in good faith, has cooperated in the investigation of a violation is subject to discipline, including termination of employment or volunteer status.

F. Dissemination and Implementation of Policy. This Policy shall be disseminated in writing to all affected constituencies. HCIC shall adopt procedures for implementation of this policy, which may include:

- (1) Documenting reported violations;
- (2) Working with legal counsel to decide whether the reported violation requires review by the Compliance Officer or should be directed to another person or department;
- (3) Keeping the Executive Committee informed of the progress of the investigation;
- (4) Interviewing employees, volunteers or other participants;
- (5) Requesting and reviewing relevant documents, and/or requesting that an auditor or counsel investigate the complaint; and
- (6) Preparing a written record of the reported violation and its disposition, to be retained for a specified period of time.

The procedures for implementation of this policy shall include a process for communicating with a complainant about the status of the complaint, to the extent that the complainant's identity is disclosed, and to the extent consistent with any privacy or confidentiality limitations.