

WPP CHILD PROTECTION POLICY

1. Introduction

World Pediatric Project (also “WPP” or the “Organization”) provides advanced medical, diagnostic and surgical care to children in need from certain countries foreign to the United States, by providing services in their home countries and by bringing children to the United States for consultation and surgery. World Pediatric Project believes all children should be safe and protected from violence, abuse, neglect, and exploitation and the Organization is committed to protecting children while they participate in its programs. In this Policy the children who participate in WPP programs are referred to collectively as “Children” or individually as “Child”. WPP recognizes that working across cultures may present situations and behaviors that are unfamiliar and may have a different meaning in the context of another culture. WPP affirms that the personnel who make the WPP mission a reality should be held to these standards and policies of child protection and accountable for their actions. However, our Personnel also deserve to be protected from untrue or insubstantial accusations, and from situations in which their obligations are unclear.

2. Objective

World Pediatric Project adopts this Child Protection Policy (“the Policy”) in order to: foster attitudes, environments, systems and relationships where participating Children and families can participate safely in WPP programs; ensure confidential information concerning Children involved with its programs is treated with confidentiality and respect by all of its personnel; and, provide a prompt, thorough and fair process for receiving and evaluating reports of abuse or violations of this Policy. This Policy does so through: (i) a limited number of clear essential rules for interacting with Children in the operation of programs; (ii) background screening of applicants for Personnel positions; (iii) training of Personnel; (iv) a reporting system for suspicion of abuse or other violations of this Policy; (v) a system of confidentiality of information concerning the Children.

3. To Whom the Policy Applies

- 3.1. World Pediatric Project has several different kinds of personnel who implement its programs and operations: employees, volunteers, interns and occasionally consultants on staff at its Richmond, Virginia headquarters and at its St. Louis, Missouri office. World Pediatric Project also has a volunteer Board of Directors and an Advisory Board in the United States.
- 3.2. In countries foreign to the United States, in a handful of cases World Pediatric Project funds in-country representatives and/or medical personnel.

- 3.3. All of the people identified in Sections 3.1 and 3.2 are “Personnel”. Certain provisions of the Policy apply only to certain individuals, as set forth herein. WPP may require consultants, contractors or advisors to WPP to submit to the Policy in the event that the engagement of such persons includes direct contact with Children or access to confidential information about Children, other than in an incidental or occasional way.
- 3.4. In countries foreign to the United States, World Pediatric Project associates with organizations operating health care services; employees or volunteers supervised and under the control and direction of such health care services administer WPP programs. Such health care services are not subject to this Policy.

4. Protection of the Children by Proper and Safe Conduct in the Operation of Programs

- 4.1. All Personnel shall work to ensure that no Child is subject to physical, sexual, emotional, mental or other form of abuse or endangerment while participating in a WPP program.
- 4.2. Children leaving their home country and coming to the United States or travelling to another foreign center of excellence for treatment in a WPP program shall be accompanied by a parent, grandparent or other relative or other duly authorized Guardian (“Guardian”).
- 4.3. Exceptions from the requirement that a Guardian accompany a Child set forth in Section 4.1 are only as follow:
 - 4.3.1. For select cases coming to St. Louis for long term stays for surgical or medical procedures, a Guardian may not accompany the Child, and the Child will stay in a qualified foster home, under special written procedures and protections established for that purpose; and,
 - 4.3.2. For individual cases on account of unusual circumstances beyond the control of WPP, and requiring the prior written approval of the CEO communicated in advance to and approved by the Response Group set forth in Section 5.4 below. The approvals of any such exceptional case shall include details of how child protection will be accomplished in such case.
- 4.4. In all cases where the Guardian has accompanied the Child, the Guardian is expected to be with the Child at all times, and to exercise custody, care and control of the Child.
- 4.5. Personnel shall never transport a Child without the Child’s Guardian present. WPP Personnel shall not be alone with a Child; the Guardian shall be present, or in exceptional circumstances if the Guardian cannot be present, another adult shall be present. Personnel shall conduct themselves in a professional and appropriate manner at all times while with a Child.

- 4.6. All communication with a Child by Personnel, whether verbal, written or electronic (including through social media) shall be with the knowledge and approval or in the presence of the Guardian.
- 4.7. An exit interview shall be conducted by Program staff with every Child and Guardian brought to the United States under a WPP program which shall include prompts to allow the reporting of any incidents or concerns relevant to this Policy.
- 4.8. All Personnel shall be provided a copy, shall familiarize themselves with, and shall in writing acknowledge and agree to comply with this Child Protection Policy.

5. Reporting of Possible Violations

- 5.1. Personnel shall report under this Section any incident, activity, behavior or evidence of which they have reasonable grounds to suspect that abuse of a Child in connection with any WPP program or other violation of this Policy has occurred or may occur.
- 5.2. Reports shall be made confidentially to the CEO of World Pediatric Project by telephone at 1-804- 282-8830, by email at childprotection@worldpediatricproject.org or by mail marked confidential and sent to the CEO at the Organization's headquarters. If the CEO is unavailable, the report shall be sent to the COO or the US Referrals Program Director in that order.
- 5.3. All reports received shall be reviewed promptly and will be kept in the strictest confidence in accordance with applicable law. Persons making reports will not be identified without their permission, except as necessary in connection with any potential or pending legal action or criminal investigation.
- 5.4. A Child Protection Response Group ("Response Group") shall be established and maintained consisting of the CEO, the COO, the US Referrals Program Director, and two members of the Board of Directors, to be appointed by the Chairman to serve for a one (1) year term.
- 5.5. Immediately upon receipt of a report under Section 5.1, the CEO shall transmit to and call a meeting of the Response Group, either electronic or in person.
- 5.6. The Response Group shall promptly review and investigate each Report, including:
 - evaluate whether the report is frivolous;
 - notify the parents of the Child or Children involved;
 - select a spokesperson to handle inquiries in a discrete, informed and diplomatic way;
 - document all matters related to the reported incident and accumulate all files related to the hiring or selection of the persons(s) involved;

- report the incident to legal counsel and insurance carrier, if indicated by the circumstances; and,
- contact and cooperate with the appropriate civil authorities, if indicated by the circumstances, under the advice of legal counsel and insurance carrier.

Each report will be handled forthrightly with due respect for privacy and confidentiality. The care and safety of the Child is the first priority. Allegations will be taken seriously. The Child, the Child's family and the accused will be treated fairly and with dignity, and be provided an opportunity to be heard. The accused should not be confronted until the Child's safety has been ensured. Upon receipt of a report, the accused should be temporarily removed from contact with children, and may be relieved of his or her other duties pending resolution of the matter. Paid employees of the Organization may be suspended with or without pay.

5.7. Nothing in this Policy is intended to interfere with the obligations certain Personnel may have as mandated reporters under state law to report certain matters that come to their attention to state child protection authorities.

6. **Consequences of Violations**

Failure to follow the practices and rules outlined in this Policy may result in discipline, dismissal, disaffiliation, or removal from World Pediatric Project and its programs. However, nothing in this Policy is intended to or shall restrict the range of action of WPP with respect to at will employees, including, but not limited to, the ability to take disciplinary action for behavior which does not violate this Policy but nonetheless is deemed inappropriate or unacceptable in the sole discretion of WPP.

7. **Recruiting and Screening of Certain Personnel**

7.1. Employees. Before hiring any paid worker for a position which includes supervision or custody of minors the Organization will:

- obtain a completed employment application;
- personally interview the applicant;
- explain this Policy, and require the applicant in writing to acknowledge receipt and understanding of this Policy, and authorize a background check;
- contact the applicant's references and record pertinent comments;
- conduct a criminal and civil records check on the applicant;
- obtain a negative (or negative dilute) result on a pre-employment drug screen, if a drug screen is thought to be advisable;
- obtain the applicant's motor vehicle record, when pertinent to job responsibilities.

7.2. Board of Directors, Advisory Board, Volunteers and Interns

- 7.2.1. For the Board of Directors and Advisory Board and for volunteers and interns who have substantial interaction with Children, the same procedures shall apply as apply to paid workers under Section 7.1.
- 7.2.2. For volunteers and interns who do not have substantial interaction with Children, the Organization will:
- obtain a completed volunteer or intern application;
 - personally interview the applicant;
 - explain this Policy, and have the applicant in writing acknowledge receipt and understanding of this Policy, and authorize a background check;
 - at its discretion, contact the applicant's references and record comments;
 - conduct a criminal and civil records check on the applicant, which shall include at least a check of the National Sex Offender Registry and applicable state registries;
- 7.3. Within 30 days of the date this Policy originally enters into effect, the Organization shall assure that for all Personnel background checks applicable to them under this Section have been performed and are on record.
- 7.4. Employees as well as interns and volunteers with substantial interaction with Children shall have the background check repeated by WPP no less frequently than every three (3) years.
- 7.5. WPP will not knowingly employ or affiliate with any individuals convicted of pedophilia, child abuse, any offense involving children, or any offense involving aggressive or violent behavior.

8. Training

The Organization shall provide training in child protection and administration of this Policy to employees, volunteers and interns in its US offices, the Board of Directors, the Advisory Board, and international contract staff. The amount, frequency and nature of the training will differ to reflect the nature of the obligations and the circumstances of the persons trained, but shall include for all personnel initial training and orientation at the beginning of their relationship with WPP. All Personnel are required to successfully complete the training required of them by this Policy as a condition of their employment or volunteer/internship relationship with the Organization.

9. Confidential Information

- 9.1.** All information (in whatever form) about the medical condition or course of treatment or background information on Children and their families shall be treated as confidential by WPP Personnel at all times, and in accordance with this Policy. This information shall be kept in a secure location and appropriately protected from general access. Access to information on Children and their families will be limited to WPP staff that requires access as part of their responsibilities and job description.
- 9.2.** WPP may ask Guardians or parents of the Children for permission to disclose certain information, including name and photograph and synopsis of medical condition and treatment. Any such permission shall be in writing in the native language of the Guardian.

10. Publications and Website

WPP will only use pictures and language that promote the integrity of the Children. Pictures will be appropriate and respectful taking account of the Child's local custom, and may not be sexually suggestive. Identifying information other than the Child and Guardian's first name, photograph and country will not be used on the website, in any print publications, or in any other communications to the public.

11. Review of the Policy

This Policy will be reviewed on an annual basis and considered part of the Employee Handbook, Board of Directors Manual, and any manuals or other materials provided to interns and volunteers.



WORLD PEDIATRIC PROJECT
Child Protection Policy
Acknowledgement and Agreement

I have been provided the Child Protection Policy of World Pediatric Project. I have fully read it, and I understand it. I have had an opportunity to ask WPP personnel questions about the Policy, and have had my questions answered. I understand the behavior that is expected of me with respect to the Children and Guardians involved with World Pediatric Project and its programs.

I understand that my failure to comply with the Child Protection Policy may be grounds for discipline, dismissal, disaffiliation or removal from World Pediatric Project or its programs. I understand further that nothing in this Policy is intended to or shall restrict the range of action available to WPP with respect to at will employees, including, but not limited to, the ability to take disciplinary action for behavior which does not violate this Policy but nonetheless is deemed inappropriate or unacceptable in the sole discretion of WPP.

If I become aware of any conduct or situation which gives reasonable ground to suspect that abuse of a Child or a violation of this Child Protection Policy has occurred or may occur, I will immediately notify the CEO of World Pediatric Project in the manner set forth in the Policy at Section 5.

Date: _____

Printed Name: _____

Signature: _____