

 The Children's Inn at NIH	Policy: Code of Ethics		
	Effective Date: 6/8/06		
	Applicable to: All Staff, Board members, Committee members, Trustees, and Volunteers, Also, Vendors & Consultants while performing service for The Inn		
Policies & Procedures	Forms: N/A		
	Approved by: Board of Directors via Audit	Date Approved: 06/08/06 Revision approved: 6/7/07, 6/6/1, 6/1/17	Last Review by Audit: 4/17 Next Review Date: 04/18

POLICY: Code of Ethics

RATIONALE: To establish the rules by which The Children's Inn staff, Board members, Volunteers, as well as other vendors and consultants follow while performing service for The Inn.

I. Introduction

The following pages constitute The Children's Inn Code of Ethics (Code) - starting with our Values and then providing more detailed guidance. These are the rules by which we operate. We ask that each of you read and familiarize yourself with what the Code says. You will be asked to always abide by them.

We operate in a highly public environment and, in many ways, a fishbowl. We are partners with The National Institutes of Health and many others who rely on us to do things correctly. We have daily contact with children who are undergoing treatment at the NIH, as well as their families. We must treat them with respect and consideration and maintain the confidentiality of their personal situations. We also must always treat each other with the highest level of respect and professionalism, recognizing that every individual's opinions are valued. In many ways this often presents a delicate balancing act but we must always remember that fair treatment, ethics and integrity are of the utmost importance.

This Code applies equally to all of The Children's Inn Staff, the Members of our Board of Directors, Committee members, Trustees, **and** our Volunteers. It also applies to all Consultants and outside vendors while they are performing services for us. If you do not understand any aspect of the Code, or if you wish further clarification, you should contact the Chief Executive Officer or a Member of the Audit Committee of the Board of Directors. If you are aware of what is or may be a violation of the Code, you are obligated to report it to one of them.

Directors, Committee members, Trustees, staff and volunteers are required to sign a Certification affirming their compliance with this Code at the time of their election, employment or service and annually between October 1 and December 31 thereafter. Consultants and Vendors affirm their compliance with this Code when they sign The Children's Inn contract form.

If you are an employee of the National Institutes of Health, you are bound by the NIH Standards of Ethical Conduct and Financial Disclosure (“the NIH Standards”). In the event conflicts between the NIH Standards and The Inn’s Code may arise, you are bound by the NIH Standards.

Never underestimate our personal commitment to the standards contained in the Code and our resolve to ensure that all of us are above reproach as we continue to provide the outstanding service for which we are known.

Thank you for your assistance in this very important matter. We are relying on each of you to make it work.

Jennie Lucca
Chief Executive Officer

II. The Code of Ethics (Code)

The Values of The Children's Inn (The Inn)

1. Integrity

- We will act with personal and professional integrity.

2. Respect

- We will respect others and support and protect diversity.

3. Loyalty

- We will be loyal to The Children's Inn and its mission.

4. Confidentiality

- We will protect confidential information.

5. Responsibility

- We will manage our resources in a responsible manner maximizing our ability to advance the mission of The Children's Inn.

6. Fundraising

- We will promote voluntary giving.

7. Transparency

- We will be open and candid about our activities and operations.

8. Governance

- We will govern carefully and honestly to advance the mission of The Children's Inn.

9. Compliance

- We will comply with our Code, the Conflicts of Interests Policy, the policies and procedures of The Children's Inn, as well as any applicable federal, state and local laws.

10. Duty

- We will seek guidance concerning and report breaches of our Code and Conflicts of Interests Policy.

Code 1 – Integrity

We will act with personal and professional integrity.

- 1.1 We will communicate candidly, honestly and openly in the statement of any material facts related to our official duties and activities.
- 1.2 We will strive to achieve the highest standards of performance, service and excellence.
- 1.3 We will suggest improvements when circumstances warrant it.
- 1.4 We will be accurate, fair and timely in our communications.

Code 2 – Respect

We will respect others and support and protect diversity.

- 2.1 We will treat others equitably and respectfully in all aspects of our activities without regard to race, color, religion, creed, age, sex, national origin or ancestry, marital status, veteran status, sexual orientation or status as a qualified disabled or handicapped individual.
- 2.2 We will support equal opportunity throughout all our efforts.
- 2.3 We will, in the furtherance of our responsibilities to The Children’s Inn, refuse to engage in any form of discrimination or harassment.
- 2.4 We will listen carefully and recognize that healthy diversity means diverse points of view.

Code 3 – Loyalty

We will be loyal to The Children’s Inn and its mission.

- 3.1 **Loyalty –**
 - 3.1.1 We will be loyal to The Children’s Inn organization and its mission – not to any particular individual or group of individuals.
 - 3.1.2 We will not engage in any conduct that would undermine the public’s trust or would tarnish the reputation of The Children’s Inn.

3.1.3 We will not engage in any activity or relationship that would create an apparent or actual conflict of interests that would adversely affect our ability to faithfully and loyally perform our service to The Children's Inn.

3.2 Gifts to Individual Board members or staff –

3.2.1 Individual Board members or staff will not solicit or accept personal gifts of cash or kind from vendors or potential vendors unless the item has a retail value of less than \$35.00. All gifts of less than \$35.00 must be reported to the CEO.

3.2.2 We will not solicit or coerce the offering of a gift, accept a gift in return for being influenced in the performance of an official act or accept frequent gifts (even of small value) such that a reasonable person is likely to conclude the individual is using her position for private gain.

3.3 Nepotism -

3.3.1 The Children's Inn will not employ family members of existing employees or volunteers in leadership positions. Exceptions may be made only if there are special circumstances that are in the best interests of The Children's Inn.

3.3.2 Staff will not have management or supervisory authority over a family member.

3.4 Outside Employment -

3.4.1 We will ensure that any outside employment does not interfere with our responsibilities to The Children's Inn and does not adversely affect the organization or its mission.

3.4.2 We will inform our manager of any significant outside activities that might impact our Children's Inn responsibilities.

3.5 Misuse of Position -

3.5.1 We will not use our position for private gain, for the endorsement of any product, or for the private gain of any service or enterprise, friends, family members, or persons with whom the employee or volunteer is affiliated.

3.5.2 We will not endorse a particular candidate or political party on behalf of The Children's Inn.

3.6 Restrictions on Former Employees, Volunteers and Directors -

- 3.6.1** We are aware that the duty of loyalty to the organization continues even after the formal employment or volunteer relationship has ended.
- 3.6.2** We are aware that our duty to not disclose confidential information continues even after our employment ends.
- 3.6.3** We will not use confidential information gained in the course of our employment or volunteer efforts for our own personal gain either during or after our relationship with the organization ends.

3.7 Vendor Relationships -

- 3.7.1** We will treat vendors fairly and avoid favoritism.
- 3.7.2** We will offer vendors the opportunity to offer or qualify their products or services on a fair competitive basis.
- 3.7.3** We will recuse ourselves with regard to vendor selection whenever there is a real or perceived conflict of interest.

3.8 Full Disclosure -

- 3.8.1** We will make full disclosure of all apparent and actual Conflicts of Interests.
- 3.8.2** We will abide by the operative rule of thumb: “when in doubt – disclose.”

Code 4 – Confidentiality
We will protect confidential information.

- 4.1** We will not disclose to an unauthorized individual or organization any confidential, privileged or non-public information entrusted to us.
- 4.2** We will respect the privacy of others and private information.
- 4.3** We will recognize that all information, whether hard copy or electronic, is the property of The Children’s Inn and may not be copied or removed without express permission of your supervisor or the CEO.
- 4.4** We will require that all employees, volunteers and relevant vendors sign a “confidentiality statement,” as a condition of their employment or service with The Children’s Inn.

- 4.5 We will prohibit all employees and volunteers from engaging in any financial transaction using non-public or confidential information to further their own private interests.
- 4.6 We take the obligation to protect personal information very seriously. Donors, corporations and our partner agencies can have complete confidence in our ability to utilize and manage information with the highest degree of confidentiality by ensuring that our computer and information management systems are protected from unauthorized use and that each department has appropriate policies and procedures in place to secure and protect personal information.
- 4.7 We will respect the privacy of donors and safeguard the confidentiality of information that a donor reasonably would expect to be private and we will respect the wishes of donors that may prefer to remain anonymous. If a donor prefers anonymity, we will not publicly release these names, addresses or amounts of their gifts, unless required to do so by law.
- 4.8 We will make the annual IRS form 990 tax return and exempt application of The Children's Inn available for public inspection, as required by law. In doing so, we will ensure that the portions of the form 990 tax return, that are not available for public inspection are so designated.
- 4.9 When providing information to the media, we have an obligation to report accurately and completely all relevant material facts. In order to ensure that we comply with this obligation, employees or volunteers receiving requests for information from the news media shall not respond to the request personally but will refer the request to The Children's Inn Communications Department.

Code 5 – Responsibility

We will manage our resources in a responsible manner maximizing our ability to advance the mission of The Children's Inn.

- 5.1 We will maintain accurate financial records and report our financial results in an accurate and timely manner.
- 5.2 We will be honest and faithful fiduciaries and protect the public funds entrusted to us.
- 5.3 We will use the resources, equipment and material of The Children's Inn only for the necessary performance of our duties.

- 5.4 We will comply with all limitations on incurring expenses in the course of authorized activities for The Children's Inn and will not seek or receive reimbursement for expenses not incurred.
- 5.5 We will adopt a procedure for the selection of outside vendors that ensures a fair price and avoids any conflict of interest. We will provide employees and volunteers with a confidential means to report suspected financial impropriety or misuse of The Children's Inn's resources. The Audit Committee will serve as a review, coordination and appeals body for ethics issues concerning the organization and its work. In a situation where action or decision by management would involve conflicts of interests, the Audit Committee will review and decide the matter in the first instance.

Code 6 – Fundraising
We will promote voluntary giving.

- 6.1 We will promote voluntary, non-coerced giving.
- 6.2 We will use accurate, truthful solicitation and promotional materials.
- 6.3 We will honor all statements made by the organization in its fundraising appeals and about the use of a contribution.
- 6.4 We will honor the known intentions of a donor regarding the use of donated funds.
- 6.5 We will respect donor confidentiality and privacy.
- 6.6 We will acknowledge gifts in a timely manner and in accordance with all applicable laws.
- 6.7 We will recognize gifts appropriately.

Code 7 – Transparency
We will be open and candid about our activities and operations.

- 7.1 We will publish an annual report that will convey information to the public in at least the following critical areas: The Children's Inn's board members and staff leadership, the mission and goals of the organization, the organization's programmatic activities and achievements and a list of major donors with appropriate anonymous citations when so requested.

- 7.2 We will provide members of the public who express an interest in the affairs of the organization with a meaningful opportunity to communicate with an appropriate representative of The Children’s Inn.
- 7.3 We will make available for public inspection a copy of its annual report, its most recent IRS form 990 filings, its most recent audited financial statements, as well as a copy of its exempt status application.

Code 8 – Governance

We will govern carefully and honestly to advance the mission of The Children’s Inn.

- 8.1 We will commit ourselves to the mission of The Children’s Inn and competently, efficiently and professionally perform the duties and tasks we agreed to assume.
- 8.2 We will work cooperatively with each other always striving to be – or become – genuinely united in our actions and decisions.
- 8.3 We will honor the democratic process and support the final decisions of the Board – even if we may disagree with them.
- 8.4 We will fully and candidly discuss issues entrusted to us and respect others’ viewpoints.
- 8.5 We will invest in the education and training of our Board, employees and volunteers as a means of ensuring excellence in operations, service and programs.
- 8.6 We will ensure that we are competent to accomplish the tasks assigned to us and, if not sufficiently competent, will ask for assistance and become competent.
- 8.7 We will personally and professionally endeavor to be active listeners and learners, embracing opportunities for others to express their ideas.
- 8.8 We will provide a genuine opportunity to all qualified applicants for staff positions. Position announcements will be communicated in advance and all qualified applicants will be given an opportunity to apply and be considered.
- 8.9 We will provide Board members, non-board Committee members, Trustees, employees and volunteers with a clear and meaningful orientation to the mission of The Children’s Inn, its policies and procedures. We will provide applicable copies of our Code, Conflicts of Interests Policy, their job description, appropriate equipment and overall performance expectations.

Code 9 – Compliance

We will comply with our Code, policies and procedures of The Children’s Inn as well as federal, state and local laws.

- 9.1** We will establish and implement systems to ensure that we comply with all applicable federal, state and local laws.
- 9.2** We will designate The Inn’s General Counsel as our compliance officer with the responsibility for investigating issues relating to non-compliance with any applicable federal, state or local laws and regulations.
- 9.3** We will consider non-compliance with the applicable laws to be a disciplinary offense subject to disciplinary measures.

Code 10 – Duty

We will seek guidance concerning, and report breaches of, our Code.

- 10.1** We will seek guidance from The Children’s Inn Audit Committee concerning the Code, its implications and its application to our actions and decisions.
- 10.2** We will report apparent or actual breaches of the Code to the Chair of the Audit committee.
- 10.3** We will treat reports of apparent or actual breaches of the Code or laws as confidentially as the law will allow. If absolute confidentiality cannot be maintained, the individual disclosing the potential or actual breach will be notified.
- 10.4** We will not tolerate retaliation against an individual or group who reports an apparent or actual breach of the Code. Such retaliation is an independent violation of the Code. See Whistleblower Policy for details.
- 10.5** We will make all reasonable efforts to fairly, and in a timely manner, investigate and resolve all reports concerning apparent or actual breaches of the Code.

III. Certifications

Please sign in one of the spaces below as appropriate:

I certify that I have read, understand, and will abide by The Children's Inn Code of Ethics.

OR

I certify that I, as an employee of the National Institutes of Health, have read and understand The Children's Inn Code of Ethics and will abide with it with the exception of any tenets that may conflict with the NIH Standards of Ethical Conduct and Financial Disclosure which I understand to have priority standing.

Name: _____

Signature: _____

Date: _____