

Memorandum

NHI's Safety and Security Reporting and Review Process

March 8, 2019

The National Hispanic Institute has at times received inquiries concerning how the organization protects the students entrusted to our care in our forty-year history. These inquiries are often expressed socially, rarely through direct reporting to NHI offices. Occasionally, we also receive written questions from parents. Whatever the channels used, we take all allegations seriously as a matter of policy and with the intent of continuing our long-standing record of providing both participants and volunteers with safe learning environments. Whenever we find allegations that demand serious inquiry, we have mechanisms approved and established by our Board of Trustees to address such issues in a timely and comprehensive manner. Our Board has previously established an Incident Committee that is authorized to thoroughly investigate claims and make final recommendations for action by the full Board. This committee is empowered to interview all parties involved and/or persons making claims to ensure that all information is fact-based and not biased or influenced by information that is not supportable. Once having completed a full review, each individual case and information collected is presented to the full board for final disposition.

As a private non-profit organization, membership in the National Hispanic Institute is considered a privilege that requires acknowledgment and adherence to policies. Volunteer participants who serve in program oversight roles are required to meet even higher standards in their moral and ethical conduct. For example, any person serving in an oversight capacity with minor-age students who is discovered or reported as acting outside of NHI's code of ethics is subjected to an internal review process. Due to privacy of information and protection for everyone involved, sensitive matters are handled by the organization's Incident Committee. Information gathered is generally not made public unless it is determined that NHI has a legal duty to report the matter to authorities or the Board determines that public action should be taken under the circumstances. Whether a violation of NHI's code of ethics, a violation of the organization's volunteer agreement, or legal violations, the Incident Committee uses board approved protocols to recommend any changes in the members' employment status, opportunity to volunteer, and capacities to remain a member in good standing. Actions taken by our Board of Trustees can include permanent removal from the

organization. Legal violations that are supported by credible evidence may ultimately be referred to the appropriate authorities.

For the past several years, in cooperation with our host institutions, NHI policy makers have continued to enhance the safety, security, and protection of its minor-age participants. Additionally, attention has been directed at enhancing the organization's overall policies and procedures to adopt best practices for our organization and its members. Updates and improvements to NHI policies have resulted from working with our nation's leading universities who are equally committed to safety and security on their respective campuses. Furthermore, our legal counsel provides regular advice to our management and Board of Trustees regarding "best practices" and provides us with publications and resources that we can use as reference information when evaluating our current policies and procedures.

Finally, our highest level employees, volunteers with experience in human resources, and board members with extensive backgrounds in law also bring a full and rich set of experiences to supplement our efforts to enhance and strengthen the safety and well-being of NHI youth. Specific actions taken in the last several years include the following:

- increasing the standards relating to NHI's volunteer agreement;
- adopting a comprehensive code of ethics;
- reinforcing the organization's emergency response systems;
- implementing an Incident Report Form that can be used throughout the NHI organization;
- implementing and enhancing NHI's safety and security policies;
- adding our volunteer policies online; and
- featuring our reporting mechanism on our home page.

Additionally, NHI's Fundamentals, a values-based approach to behavior that includes a safe and secure organizational culture and environment, has been widely circulated to our members. To gather information regarding non-compliance with the organization's policies, a requirement has been adopted that directs any person acting as a volunteer or employee on behalf of NHI to report any violations to the appropriate supervisor and/or report@nhimail.com.

The founders, NHI Board of Trustees, employees and thousands of volunteers, parents, and partners have devoted decades to creating an organization that serves more than 3,000 young people each year and has a network of over 85,000 alumni

worldwide. Our leadership is aware of the cultural issues facing all organizations in our society today. NHI (together with experts and trusted advisors) is dedicated to addressing the ever-changing cultural landscape that surrounds our organization throughout the Americas.

While incidents of improper conduct by students or leaders are extremely rare, we take immediate action if we suspect, discover, or receive reports that bring it to our attention. We also review our policies and practices regularly to fine-tune any needed changes to assure adequate protection and training for our members and volunteers. Below is a copy of our policy which is prominently displayed on our website.

If you have any questions or concerns about this or any other issue, please reference our Code of Ethics (<https://www.nationalhispanicinstitute.org/our-values/>) for information about how each member is expected to comport himself/herself. You may direct incident reports to report@nhimail.com or call our offices at 512-357-6137 and ask to speak with the office of the executive vice president.

NHI serves students in the United States and abroad. As the students involved with NHI look to their adult NHI counterparts for examples of respect, integrity, honesty and excellence, *sexual misconduct* in any form is expressly prohibited. NHI Associates must not, under any circumstance, engage in inappropriate relations with an NHI student or participant and must understand the difference between appropriate physical contact versus contact that is, or could reasonably be perceived as being, sexual in nature, inappropriate, or disrespectful. To be clear, sexual misconduct in any form that involves an NHI Associate will not be tolerated. *Violations may result in permanent removal from any and all activities associated with NHI, and such violations may also be reported to law enforcement.*