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The Seven Deadly Sins of Borrowed Risk Management Policies

Audio Dial-In Information:
U.S. & Canada: 866.740.1260
Access Code: 7853891

February 2, 2011

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Nonprofit Risk Management Center
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Risk Management and Policies

- Tools, including policies
- Training and Supervision

Risk Aware Nonprofit

Culture

Common Policy Needs

- Governance
- Facilities
- Finance
- Human Resource / Volunteer Management
- Youth Protection
- Liability Shields

- Fundraising
- Special Events
- Technology (including social media)
- Intellectual property
- Records
- Workplace safety
**Borrowing Policies: The Upside**

- Avoid “reinventing the wheel”
- Fosters “networking,” and reaching out to leaders of other nonprofits
- Borrowed policies have been “tested” somewhere else

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**Seven Deadly Sins - #1**

- **Internal inconsistencies**
  - “We recommend that you remove references to ‘Members’ in your Bylaws since ABC Nonprofit is not a membership organization.”
Seven Deadly Sins - #2

- **Mismatch with “corporate” culture**
  - “The Paid Time Off policy includes language that refers to compensation categories normally founds in a sales or manufacturing business. This language seems wholly inapplicable to your workplace.” For example:
  - Paid days off are paid at the employee’s base pay rate at the time of absence. It does not include overtime or any special forms of compensation such as incentives, commissions, bonuses, or shift differentials.

Seven Deadly Sins - #3

- **Overly complex or prescriptive**
  - “We are concerned that through the adoption of many detailed, highly prescriptive policies, ABC has voluntarily subjected itself to numerous rules and requirements that go far beyond the scope of the laws that apply to the organization. In addition, the agency has created a web of policies that it must follow carefully. We believe that these policies are unnecessarily complex and their complexity creates a high risk of non-compliance.”
Another Example

• “We recommend deletion of the section providing very prescriptive penalties for excessive absenteeism and tardiness; a more typical policy would give management discretion to administer discipline for such offenses, up to and including termination.”

Seven Deadly Sins - #4

• Mixed / inappropriate messages
  ▪ “The current policy on conflicts of interest reflects a common view that conflicts of interest are always and without exception a bad thing. Many nonprofits have adopted a similarly black and white but impractical view. Conflicts of interest are inevitable in organizational life. The key is that they are handled in a timely and appropriate manner.”
Seven Deadly Sins - #5

- Dated or over-reaching
  - “Hair accessories can include barrettes, comb, and ponytail holders. No excessive hair accessories or colors are allowed (i.e. colored or metallic hair jewelry, neon or extreme hair colors).”

Seven Deadly Sins - #6

- Impractical or a “poor fit”
  - “The overarching concern we have is that there are a multitude of policies that ABC has adopted which mimic those that are suited to and required in larger organizations with paid employees.”
Seven Deadly Sins - #7

- **Best kept secret or ignored**
  - “A good rule of thumb for all policies—and especially employment policies—is that if the policies are so complex or voluminous that they are not strictly followed, changes should be made. ABC can improve its Employee Policy Manual by modifying the current policies to better suit the organization and eliminating those policies that are unworkable.”

Policy Drafting Tips

- **Before you begin drafting:**
  - Think about style (e.g., formal versus informal) and organizational culture
  - Anticipate resistance and other implementation challenges
  - Reflect on the context for any new policies
    - Relationship to existing policies and risk management activity; who should be involved
Policy Drafting Tips

• Use clear, concise language
• Strive for consistency
• Think practical
• Respect cultural norms
• Avoid overly prescriptive procedures that “tie the hands” of management

Post-Drafting Tips

• Invite feedback
• Consider how best to “roll out” and introduce new policies
• Consider whether you require confirmation of receipt
Policy development tool

• My Risk Management Policies
  - We are providing a complimentary subscription to participants in today’s webinar

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### My Risk Management Policies

The policies you have created are listed below. You may add a new policy by clicking on the Add a Policy button. You may also edit an existing policy by clicking on the pencil icon. To permanently remove a policy record, click on the red icon. To view a policy or download a PDF version click on the preview icon. You may also email an HTML version of your policy by clicking on the envelope icon.

If your policy is ready for printing/downloading, click the PDF icon ($\text{\tiny PDF}$) in the action column.

<table>
<thead>
<tr>
<th>Subscriber: Herman, Melanie</th>
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<tr>
<th>Policy Name</th>
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<tbody>
<tr>
<td>Interview Questions - Youth-Serving Position (Master Updated 11/2/2010)</td>
<td>Draft 1/2/2010</td>
<td><img src="image" alt="Action Icon" /></td>
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<tr>
<td>Letter to Parents Regarding the Youth Protection Program (Master Updated 11/3/2010)</td>
<td>Draft 3/15/2010</td>
<td><img src="image" alt="Action Icon" /></td>
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<tr>
<td>Operating Reserve Policy (Master Updated 12/6/2011)</td>
<td>Draft 1/28/2011</td>
<td><img src="image" alt="Action Icon" /></td>
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3 ways to search

1. Begin by entering the name of the new policy you wish to create (e.g. Blogging Policy) or keywords that might be contained in the policy. You do not need to include your organization's name in the policy name.

2. Get a listing of our policies.
   - List all policies alphabetically.
   - List all policies by category type.

   OR

3. Fill in the proposed name of the policy you want to create and we'll search our database for content that is applicable. You may also enter keywords that might be found in the policy.

3. Then click on the policy template name in the list that you wish to use to build your policy.
   - Note: You will be able to easily select only the content you need on the next page. You may edit/change the policy name and content once the policy is created.

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Build Grievance Policy and Procedures - Clients

Each paragraph from the Grievance Policy and Procedures template is listed below. Check the box adjacent to the paragraphs you wish to include in your new policy. You may also check the Select All box. Once you have your new policy you may edit it to modify the text and add or remove paragraphs.

Policy Name: Grievance Policy and Procedures

Select Policy Text

☐ [our logo]

☐ (our organization name)

☐ (the policy name)

☐ [our organization name] strives to faithfully ensure that every client served is treated with dignity, fairness, and respect. It is anticipated, however, that misunderstandings and mistakes might occur that cause a client to become concerned or upset. This policy outlines the process for clients to report their concerns, hear their concerns heard, and find a resolution to the concern. All clients have the opportunity to have their concerns heard by more than one staff member and know that all concerns are addressed appropriately and fairly.

☐ [our organization name] will make every effort available for clients to have a fair process to voice concerns regarding services provided by [our organization name].

☐ [our organization name] will make every effort available for every concern to be heard, handled professionally, and a resolution is obtained.

☐ Clients will not be subjected to retaliation or discrimination for filing a grievance.

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Select only one of the shaded segments below for this policy.

☐ All grievances need to include the following information:
1. Consider facts about the situation prompting the grievance. Suspicious or assumptions about the grievance cannot be considered.
2. Date and time of incident(s).
3. Individuals involved.
4. Proposed resolution of the complaint.

☐ Complaints may be submitted in writing, but need not be. If you wish to provide feedback on agency policies or raise a concern about services provided, please request an opportunity to meet with the lead staff member in the relevant program or section.

☐ Once completed grievance forms must be forwarded to Program Director/Supervisor within 48 hours.

☐ The respective Program Director will address the grievance or forward to the appropriate person within 48 hours.

☐ Program Directors/Supervisors will meet with clients who complete a grievance form within 48 hours or as soon thereafter as practicable to discuss their concerns.

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Grievance Policy and Procedures - Clients

Nonprofit Risk Management Center strives to faithfully to ensure that every client served is treated with dignity, fairness and respect. It is anticipated, however, that misunderstandings and mistakes might occur that cause a client to become concerned or upset. This policy outlines the process for clients to report their concerns, have their concerns heard, and find a resolution to the concern.

All grievances need to include the following information:

1. Concise facts about the situation prompting the grievance. Suspicions or assumptions about the grievance cannot be considered.
2. Date and time of incident(s).
3. Individuals involved.
4. Proposed resolution of the complaint.

Program Directors/Supervisors will meet with clients who complete a grievance form within 48 hours or as soon thereafter as practicable to discuss their concerns.
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# Edit Grievance Policy and Procedures - Clients Content

The fields (segments) for this policy are listed below. You may add a new segment by clicking on the Add a Policy Segment button. You may also edit an existing segment by clicking on the pencil (✏️). To permanently remove a segment record, click on the red X (❌). To change the order of a segment click on the up or down arrow (↑️, ↓️).

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Questions?
Next Month’s First Wednesday Webinar

- Risk Communication
- Wednesday, March 2, 2011
  2 pm Eastern

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