

Crime Stoppers USA Policies and Procedures

Policy/Procedure Title: Conflict of Interest Policy

1. Purpose

The purpose of this policy is intended to permit Crime Stoppers USA board members to identify, evaluate and address any real, potential, or apparent conflict of interest that might, in fact or in appearance, call into question their duty of undivided loyalty to Crime Stoppers.

2. Scope

This policy/procedure is applicable to each member of the Crime Stoppers USA Board of Directors and any staff members

3. Background

Crime Stoppers USA is a charitable organization whose board members are chosen to serve the public purposes to which it is dedicated. These persons have a duty to conduct affairs of the organization in a manner consistent with such purposes and not to advance their personal interests.

4. Definitions

a conflict of interest is defined as an actual or perceived interest by a board member or staff member in an action that results in or has the appearance of resulting in, personal, organizational or professional gain. Conflict of interest includes any bias or the appearance of bias in decision making process that would reflect a dual role played by a member of the organization.

5. Legislation

Not Applicable.

6. Policy

The policy of Crime Stoppers USA is to ensure that this organization serves the Crime Stoppers USA as a whole rather than serving a special interest group creating the appearance of conflict of interest can cause embarrassment to the organization and jeopardize credibility of the organization.

7. Procedure

- A) At the beginning of each year, each member of the board of directors of the Crime Stoppers USA shall complete and return to the corporations Secretary the Conflict of Interest Statement for Board of Directors (attached). This document shall be delivered to the Secretary no later than January 15th of each year.
- B) Board members in decision-making roles should make known their connections with companies, groups or individuals doing business with the organization. This information should be provided at least annually as identified in 7. A) above.
- C) Board members who have an actual or potential interest should not participate in discussions or vote on matters affecting transactions between the organization and the other party.
- D) Any staff members who have actual or potential conflict should not be substantively involved in decision-making affecting such transactions.
- E) Any conflict of interest is to be reported to the Chair of Crime Stoppers USA immediately for further action.
- F) At the beginning of each board meeting, the Chair will ask for any board members that need to disclose any real or perceived conflicts of interests prior to proceeding with the meeting.

8. Verification/ Authorisation/ Approved by

This policy and procedure was approved by a board resolution at the Crime Stoppers USA Board of Directors meeting on the 18th of May, 2011.

Crime Stoppers of the United States of America, Inc.

Conflict of Interest Statement for Board of Directors

No member of the Crime Stoppers of the United States of America, Inc. ("CSUSA") board of directors shall derive any personal profit or gain, directly or indirectly, by reason of his or her participation with the CSUSA board of directors. Each individual shall disclose to the CSUSA board of directors any personal interest, which he or she may have in any matter pending before the CSUSA and shall refrain from participation in any decision on such matter.

Any member of the CSUSA board shall identify his or her affiliations with such agency or agencies that are seeking funding from CS USA.

Any member of the CSUSA board shall refrain from obtaining any list of CSUSA donors for personal or private solicitation purposes at any time during the term of their affiliation.

At this time, I am a board member, a committee member, or employee of the following organizations:

Circle any of the following circumstances that are applicable:

1. I am a participant, directly or indirectly, in any arrangement, agreement, investment, or other activity with any vendor, supplier, or other party, doing business with CSUSA which has resulted or could result in personal benefit to me.
2. I am a recipient, directly or indirectly, of any salary payments or loans or gifts of any kind or any free service or discounts or other fees from or on behalf of any person or organization engaged in any transaction with CSUSA.

Any exceptions to 1 or 2 above are stated below with a full description of the transactions and of the interest, whether direct or indirect, which I have (or have had during the past year) in the persons or organizations having transactions with CSUSA:

I have read the Crime Stoppers USA Conflict of Interest policy and agree to remain in compliance with the Policy.

Date: _____

Signature: _____

Printed Name: _____

Records Retention for Crime Stoppers Operations

The corporation which owns and controls the Crime Stoppers cash for anonymous crime solving tips program sometimes needs guidance or advice regarding records retention.

Crime Stoppers receives or generates several different types of records. Categories include: Corporate records required by the state or federal government agencies which regulate or tax non-profit corporations; Corporate Bylaws, Minutes, Resolutions, and Standard Operating Policies, regarding the internal operations of the nonprofit corporation; various types of financial records; anonymous tips received, some of which are forwarded to law enforcement agencies investigating unsolved crime and some of which are not forwarded or disseminated; records documenting the payment of rewards.

Records which are required to be retained for a defined period of time by governmental agencies are set for specific time periods by the state and/or federal government. This will vary from state to state. Such records can be identified by the corporation's tax advisor and legal counsel.

As for other records of the corporation, there is no certain or established retention period that is standard. It is recommended that each Crime Stoppers corporation have its own "Records Retention Policy" that is adopted by a Resolution that is passed by the board of directors. A "resolution" is preferred to adoption of a Bylaws provision because a Resolution is recognized as a lawful act of the corporation but does not require the same formality to enact, amend, or repeal if it is a Bylaw. A record retention period may need to be adjusted to resolve any problems that may arise in applying the policy to unusual circumstances or situations. A copy of the proposed Resolution Adopting a Records Retention Policy should be circulated to the members of the board in advance of a meeting in which the item is on the Meeting Agenda to be discussed and voted upon. It is wise to seek input from the board's legal counsel, as well as from any law enforcement advisers who may have a non-voting *ex officio* type relationship with Crime Stoppers.

In determining the length of time for which a record must be retained, it is necessary to look at the type of record. Factors to be applied include:

- Is there a set time period required by the state or federal government, if so, what?
- In what format are the records?
- How much space (actual or electronic/cloud) is needed for the records?
- Do the records (if not required to be retained) have any value or use to the corporation?

Perhaps the most frequently asked question is: "How long must we retain records of communications from anonymous tipsters? The following suggestions may help answer such questions:

- If the tip appears to be absolutely worthless in the eyes of trained tip handlers and criminal investigators, it can be destroyed (in accordance with the retention policy).
- In homicide and other cases where there is no "Statute of Limitations" tips should be kept indefinitely if the case has not been solved.
- In other criminal cases, tips on unsolved cases should be kept until the statute of limitations has expired.

When a tip to Crime Stoppers has solved a case, an arrest has been made, caution should be given to destruction or purging of Crime Stoppers records. There are two (2) primary concerns:

1. Has the case reached a final disposition with no pending appeals? If the prosecuting attorneys have been given everything needed to prosecute the case, and no additional evidence is needed, there is normally no need for Crime Stoppers to retain the records. However, if there is a post-conviction appeal it is possible Crime Stoppers records could become relevant.

2. Did the Court trying the criminal or civil case issue any continuing orders compelling Crime Stoppers to preserve relevant records? If there has been a court order to preserve Crime Stoppers records, the Court Order must be obeyed, unless your attorney is successful in having a subpoena or motion to compel quashed. It is possible for collateral civil litigation or criminal investigation to run parallel to the criminal prosecution that resulted from the Crime Stoppers tip.

It is not unusual from Crime Stoppers organizations to confer with other Crime Stoppers corporations to obtain a copy of that program's Records Retention Policy as a *go by* that can be adapted to the needs and preferences of the requesting program.

After a Records Retention Policy has been established, the board should periodically review and discuss the policy in light of its history in order to ascertain whether revisions are needed.

Crime Stoppers USA Policies and Procedures

Policy/Procedure Title: Records Retention/Expungement Policy

1. Purpose

The purpose of this policy is to establish appropriate guidelines for record retention and destruction that are maintained by Crime Stoppers USA.

2. Scope

This policy/procedure is applicable to all corporate records, documents, agreements and all other such documents that preserves the corporate and financial identity and integrity of the organization.

3. Background

Crime Stoppers USA is required to maintain certain documents for a specific period of time or permanently based on internal guidelines and/or regulatory requirements.

4. Definitions

Not Applicable.

5. Legislation

This policy is guided by Federal and State of Delaware guidelines, as appropriate.

6. Policy

The policy of Crime Stoppers USA is to ensure compliance with the maintenance of records as prescribed internally and externally. Certain records must be retained and provided for visual or inspection purposes based on Federal and State guidelines making it imperative for Crime Stoppers USA to remain in compliance.

7. Procedure

The attached schedule for Records Retention/Expungement must be followed with respect to the maintenance of Crime Stoppers USA records, which may be modified from time to time based on internal or external requirements.

8. Verification/ Authorisation/ Approved by

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RECORDS RETENTION/EXPUNGEMENT

Type of Document	Minimum Requirement
Accounts payable ledgers and schedules	7 Years
Audit reports	Permanently
Bank reconciliations	2 Years
Bank statements	3 Years
Checks (for important payments and purchases)	Permanently
Contracts, mortgages, notes and leases (expired)	7 Years
Contracts, mortgages, notes and leases (still in effect)	Permanently
Correspondence (general)	2 Years
Correspondence (legal and important matters)	Permanently
Correspondence (with customers and vendors)	2 Years
Deeds, mortgages, and bills of sale	Permanently
Depreciation schedules	Permanently
Duplicate deposit slips	2 years
Employment applications	3 Years
Expense analyses/expense distribution schedules	7 years
Year end financial statements	Permanently
Insurance policies (expired)	3 Years
Insurance records, current accident reports, claims, policies, etc.	Permanently
Internal audit reports	3 Years
Inventories of products, materials, and supplies	7 Years
Invoices (to customers, from vendors)	7 Years
Minute books, bylaws, and charter	Permanently
Patents and related papers	Permanently
Payroll records and summaries	7 Years
Personnel files (terminated employees)	7 Years
Policies, active: Conflict of Interest, Procurement	Permanently
Policies, active: Segregation of Duties, and Travel	Permanently
Retirement and pension records	Permanently
Standard operating procedures	Permanently
Tax returns and worksheets	Permanently
Timesheets	7 Years
Trademark registrations and copyrights	Permanently
Withholding tax statements	7 Years

Additional forms to keep on file...

Board member applications and background checks
 Monthly agenda, minutes, treasurer's report
 Statistical reports
 Probation Fee and Repayment Reports
 IRS determination letter

Crime Stoppers USA Policies and Procedures

Policy/Procedure Title: Whistleblower Policy/Procedure

1. Purpose

The purpose of this policy is to establish guidelines for administering an anonymous means in which to allow board members and staff to report means in which to identify any inappropriate compliance or improprieties of Crime Stoppers USA.

2. Scope

This policy/procedure is applicable to each member of the Crime Stoppers USA Board of Directors and any staff members.

3. Background

Crime Stoppers USA is required to have a whistleblower policy to adequately protect the organization and its assets. Best practices for tax-exempt organizations is to have a whistleblower policy/procedure in place.

4. Definitions

Not Applicable.

5. Legislation

This policy is guided by legislation contained in the Sarbanes-Oxley Compliance regulations and is a compliance reporting requirement on the annual Internal Revenue Service Form 990.

6. Policy

The policy of Crime Stoppers USA is to ensure that any and all issues that may affect the ongoing and future concerns of the organization are immediately identified and addressed. Immediate action will be addressed by the Crime Stoppers USA Executive Committee, and if any remarkable or significant issues are substantiated, a review and discussion will take place with the full board.

7. Procedure

At the end of each calendar year, the ATTACHED 'Anonymous Survey' (attached) will be distributed to each member of the CSUSA board of directors and to any staff of CSUSA. The completed surveys will be reviewed initially by the CSUSA Executive Committee, and if any remarkable comments are found, the surveys will be reviewed and discussed by the full board of CSUSA.

8. Verification/ Authorisation/ Approved by

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ETHICS SURVEY

SARBANES-OXLEY COMPLIANCE

**ANONYMOUS SURVEY
OF
CRIME STOPPERS PARTICIPANTS**

1. Are you aware of anyone who has stolen assets (including cash, equipment, or inventory) from Crime Stoppers?

2. Has anyone asked you to commit any improper, illegal, or unprofessional acts; or have you seen anyone else doing so?

3. If someone were to steal money or assets from Crime Stoppers, would they normally get caught, in a timely manner? Why or why not?

4. If someone wanted to improperly alter the Crime Stoppers financial statements or records, would they get caught in a timely manner? Why or why not?

5. Are you aware of any Crime Stoppers Board Members, Employees (Part-Time or Full-Time), Independent Contractors or Volunteers who may be getting expense reimbursements or similar payments that could be improper or illegal? (List names and/or titles).

6. Are you aware of any Crime Stoppers Board Member, Employees (Part-Time or Full-Time), Independent Contractors, or Volunteers who may be experiencing financial or other pressures that could cause them to be excessively vulnerable to stealing or other improprieties? (Describe situation and persons involved).

7. Does Crime Stoppers expect you to report improprieties, illegal acts (sexual harassment, discrimination, etc.), fraud, stealing, etc. to either internal or external parties? If so, to whom would you communicate with? (Name, address, title)

A. Has Crime Stoppers communicated to you the types of matters that should be reported? Give examples.

B. If you did report any items, do you believe that Crime Stoppers would take appropriate actions to address the matter?

8. Describe any Crime Stoppers problems or circumstances that may cause Crime Stoppers or certain Crime Stoppers participants to violate Crime Stoppers policies, improperly report financial statements or matters, or misrepresent assets.
9. Have you received any training or guidance from Crime Stoppers on standards of ethical behavior and appropriate business practices?
10. Do Crime Stoppers officials demonstrate integrity and honesty in all of their conduct? (Describe examples of such conduct)
11. Has anyone ever threatened you or intimidated you, regarding your disclosure of any potential impropriety in Crime Stoppers? (Describe)