

International Ministries

Child Safety Policies and Procedures

Introduction

The Christian and Missionary Alliance (C&MA) is committed to the safety, protection, and nurture of the children within its scope of responsibility and care. We believe it is never acceptable for any child to experience abuse of any kind. Their protection is the responsibility of every adult within the C&MA. We expect all employees and volunteers (Staff) to conduct themselves with the utmost integrity and professionalism at all times. Working together we can create a safe and positive, nurturing environment for children guided by the highest biblical standards of morality, ethics, and prudence.

Policies and Procedures

The C&MA has a number of policies and procedures that work together to provide an appropriate level of safety, protection, prevention and response.¹ In particular policy addresses definitions of abuse, screening, a code of conduct for all adults interacting with children, training of adults (including parents) and children in child safety, child care guidelines, child abuse response including reporting, investigation, and discipline processes and procedures, and follow-up procedures.

Policy Implementation

The National Office (defined as the Office of the President of The C&MA and those corporate officers and staff serving under the president) is responsible for development and implementation of child safety policies, procedures, training, and response procedures as applied to those under the authority of International Ministries (IM, defined as the National Office area of ministry, Regional offices, and C&MA Fields collectively). The National Office is also responsible to implement the National Office Abuse Charge Process (Exhibit A) as adopted by the C&MA Board of Directors along with the reporting of abuse to the appropriate civil authorities in the United States.

Regional Directors are responsible to assure the implementation of child safety policies, procedures, training and response procedures in the regions for which they are responsible. They are also responsible to have a working knowledge of the civil laws related to abuse that apply to their region.

¹ These policies were developed in consultation with the Child Safety and Protection Network's Best Practice Standards.

Field Directors (and Team Leaders where appropriate) are responsible for implementation of child safety policies, procedures, training and response procedures in the C&MA Fields (Fields) for which they are responsible. They are also responsible to know the civil laws related to abuse that apply to their particular Field. Field Directors are responsible to report all cases of reported or suspected abuse or neglect within 24 hours to the appropriate Regional Director and Vice President for IM or his designee.

All Staff are responsible to read and adopt the Code of Conduct for Child Safety as found in Exhibit C and implement, as appropriate, the child safety policies, procedures and response procedures. All Staff are responsible to report to their Field Director (or Regional Director when appropriate) within 24 hours any actual or suspected abuse, neglect, or inappropriate behavior among Staff and/or children regardless of where it may have occurred or the perceived seriousness. There should be no attempt to handle the situation privately or enter into a private agreement with the offending individual or reporting child.

Definitions of Abuse

The C&MA does not tolerate child abuse or neglect. The following definitions of abuse will be applied to all reports involving Staff of the C&MA or other mission agencies involving a C&MA child.

While it is recognized that local and/or national definitions of child abuse may vary, and there are racial, cultural, religious, and ethnic differences in child rearing and relating to children and understandings of what constitutes child abuse, it is important to remember that all children have basic human rights. These definitions have been written with the awareness of the various cultures represented on Fields. In addition, it is recognized that mission-wide definitions that all Staff will abide by will best serve adults of differing cultures in working together to prevent child abuse.

Child Abuse

Child abuse is the treatment of a child under the age of 18, often in the context of a relationship of responsibility, trust, or power that endangers or impairs the health or welfare of a child.

Child-to-Child Cases: Should both the victim and the alleged offender be under the age of 18, it will typically be considered abuse if there are more than three years difference (1095 days or more) between the children or there is a difference in responsibility, trust, or power between them. If there is less than three years age difference and there is not a significant difference in responsibility, trust, or power between them, what would normally be defined as abuse will be considered inappropriate behavior, with an action plan put in place to address the behaviors of concern and their causes. Because of these and other variables, child-to-child cases will be determined on a case-by-case basis. Child-to-child abuse includes all types of abuse defined below.

Types of Abuse

Sexual Abuse

Sexual abuse is the involvement of a child in sexual activity with an adult or another child (as defined above) which includes but is not limited to:

1. **Verbal:** Remarks which include sexual threats, solicitation, sexually explicit language (whether in person, on the telephone, or via text messaging or the internet), or any verbal expression with the intent to arouse or stimulate.
2. **Visual:** Indecent exposure, showing or taking of suggestive pictures, pornographic material of genitals, or the showing of unclothed persons, any sexual activity or simulated sexual activity such as masturbation or intercourse, peeping, leering, or staring.
3. **Physical Touching:** Physical contact (or penetration by penis, fingers, or any other body part or object) with a person's clothed or unclothed genitals, pubic area, buttocks, or in the case of a female, breast, or causing a child to perform any of these acts. Masturbation in front of or to the victim, rubbing, holding, or kissing for the purpose of sexual gratification.

Physical Abuse

Physical abuse is any act that results in a non-accidental physical injury. Such acts may include, but are not limited to: slapping, punching, beating, kicking, biting, shaking, burning, holding under water, pulling hair, or holding against one's will; excessive physical discipline.

Emotional Abuse

Emotional abuse is chronic attitudes or acts that are likely to produce emotional and mental health disorders. A subset of emotional can include verbal denigration achieved by the communication through words (i.e., derogatory name calling, criticism, yelling), vocal tones and accompanying body language and attitudes which demean a person's appearance or worth.

Neglect

Neglect is the failure of those responsible for the care of a child to meet the physical needs of the child to an extent that the child's health and/or safety are endangered including failure to meet the basic requirements for supervision, housing, clothing, medical attention and nutrition.

Inappropriate Behavior

If the internal investigation identifies behaviors that do not meet the C&MA definition of abuse, but do constitute behaviors that are harmful to children, an outcome of inappropriate behavior will be reached, with an action plan put in place to provide accountability, mentoring, and/or counseling to address both the behavior and its causes.

Screening

IM will screen all mission staff whether or not they work with children.

While volunteers should be screened, it is understood that most volunteers are provided by churches within the C&MA and as such, screening should be accomplished by the church. IM will screen volunteers that relate directly to the C&MA but will require volunteers, including short-term teams, coming to the C&MA through a church to provide a statement of assurance from the church that such screening has occurred.

IM screening program will include:

1. A written application for everyone entering IM or transferring into a position within the C&MA either as staff or direct volunteer (Applicants) which will include the following, at a minimum:
 - a. Specific history of employment or volunteer work particularly with children
 - b. Questions related to inappropriate behavior or abuse of children
2. References for all Applicants
3. Interviews with Applicants following a standard interview format
4. Background checks for all Applicants.

Training in Child Safety

Training of Adults in Child Safety

Initial Orientation

Training is to be provided to all Staff working with IM. The National Office will work with Fields to provide orientation in child safety, utilizing child safety trainers who have been trained by the C&MA or other agencies, during the orientation to the Fields of assignment.

This orientation program shall utilize the training materials provided by the National Office and include:

1. Awareness-raising: Data regarding the reality of and occurrence of child abuse.
2. Recognizing the four types of abuse, how abuse occurs, its behavioral and emotional indicators in children, as well as indicators of potential abusive behavior.
3. C&MA standards for adults regarding interaction with children. See Code of Conduct for Child Safety.
4. Identifying and preventing abuse between children.
5. Cultural factors in home culture, organizational culture, host culture, and on multi-cultural teams. Cultural and worldview issues unique to the location where staff work and cultural sensitivities of appropriate behavior shall be covered so that all staff know how to keep their children safe within the cultural context where they are living.
6. How to respond supportively to an individual reporting abuse.
7. IM reporting protocols when abuse is reported or suspected.

Annual in-service training for Staff involved in any work with children

Fields are responsible for providing in-service training annually for Staff involved in any work with children (including child care workers, youth workers, chaperones, teachers, hostel parents).

This in-service training shall include review of child safety policies, focusing on expected behavior with children, safety measures, reporting procedures, and emergency protocols. It may also cover such things as new tools and knowledge in the Field of child safety such as dealing with Internet dangers, discipline methods, etc.

All new Staff involved in work with children are required to attend the initial orientation described above prior to receiving any in-service training.

Periodic update training for other Staff not working with children

Fields are responsible for providing periodic update training for other Staff regarding child safety whenever there is a significant change in C&MA's policies or procedures, or at a minimum of every three years. The National Office is responsible for developing these training materials and making them available to the Fields. They shall cover review of C&MA policies and procedures, expected standards of behavior of all adults in their interaction with children, and may include training in additional areas such as Internet safety, new advances in the Field, new resources C&MA has available, etc.

Training for Parents and Children in Child Safety

The National Office is responsible to research and make available for parents recommended materials to use in training their children in child safety.

This may be supplemented, when possible, by direct training for parents in child safety and by direct training for children themselves in child safety, presented by staff skilled in this area, with the opportunity for parents to observe.

Child Care Guidelines

The C&MA has adopted the child care guidelines outlined in its *Safe Place* publication. The guidelines will be implemented by Fields for work with each program and/or age group under its authority (for example, nursery, child care during meetings, overnight retreats, schools, etc.) Staff working with children shall read and become familiar with the *Safe Place* publication.

Child Abuse and Safety Response

IM shall respond to all reports regarding one of our Staff or involving a child of one of our Staff. It will also respond to all historical reports of child abuse from adults who report experiencing abuse as a child under IM's care or concerning one of our Staff.

The Child Safety Procedures provides guidance for action to take if concerns are reported or observed about a child's safety or welfare. This process shall be regularly and openly communicated to all staff, as well as children of Staff and children served by the C&MA.

Following the abuse reporting procedure consistently in response to every report, utilizing a trained internal investigation team, using an outside consultant or observer, and maintaining confidentiality during the process so that each person interviewed is sharing only their own knowledge, and not thoughts shared by someone else gives credibility to the findings regardless of the outcome. If the report is confirmed, the confidence level is raised, because a full review was followed. Likewise, if the report is shown to be unfounded, those involved in the process can have confidence that the procedures were followed and C&MA's abuse definitions were utilized.

Child Safety Procedures

1. It is the responsibility of any Staff who sees, suspects, or is told of abuse to report it immediately to the Field Director, or if applicable to the Regional Director, regardless of where it may have occurred or the perceived seriousness of the situation. Cases involving both inappropriate adult behavior with children and behavior of concern between children should be reported. This shall be followed by a written report using the Child Abuse or Neglect Report Form (Report Form) within 24 hours (see Exhibit B). There is to be no attempt to handle the situation privately or enter into any private agreement with the offending staff or reporting child.

2. The Field Director (or Team Leader where appropriate) shall inform the Regional Director and the Vice President for IM or his designee within 24 hours that a report has been made regardless of the perceived seriousness of the situation. This is to be done both orally and by forwarding the Report Form.
3. Confidentiality shall be maintained within this circle of reporting. Confidentiality is critical both to protect the victim from further harm through exposure and to preserve the integrity of the process. The C&MA expects that a “need to know” position will be strictly adhered to throughout the reporting and investigation process.
4. The response and reporting process should cultivate a climate of belief, (i.e., that abuse could have taken place) while maintaining a neutral stance toward the alleged offender.
5. The first priority shall be to ensure the safety and care of the child involved and any other children who may be at risk. This involves ensuring the alleged offender has no further access to or contact with the child. It also may involve changing the environment to provide a renewed sense of safety or moving the child and their family to a safer location and providing medical attention and counseling if needed to deal with immediate physical and emotional needs.
6. National Office and Regional leadership will establish support and accountability for victims and alleged offender and their families.
7. Assistance will also be provided to reluctant or scared reporters. C&MA cannot allow potential abusers to remain in the organization and have access to other children because a victim does not want the report pursued. When victims or their parents are reluctant due to fear of reprisal, lack of understanding of other potential victims, or lack of current symptoms, IM will seek to provide support, education, and care to them while pursuing the internal investigation.
8. It is recognized that laws related to child abuse vary from country to country and state/province to state/province. C&MA will inform relevant civil authorities regarding emotional, sexual and physical child abuse and neglect as required by those laws.

Investigation Procedures

1. The C&MA takes a position that there is no statute of limitations on initiating internal investigations.
2. The National Office Abuse Charge Process as adopted by the C&MA Board of Directors shall be followed. In the case of an adult who is charged, the C&MA’s Uniform Policy on Discipline, Restoration and Appeal (Policy on Discipline) shall be initiated. In the case of a child under the age of eighteen, the matter will be handled administratively based on the principles found in the Policy on Discipline and with the same care as an adult investigation.
3. The Policy on Discipline establishes the responsible ecclesiastical authority for conducting the internal investigation of the report. The ecclesiastical authority will follow the Policy on Discipline and other written procedures regarding investigations each time a report is received. This process will be conducted as thoroughly and as quickly as is possible.

4. A neutral, unbiased stance will be maintained during the internal investigation process.
5. Support will be provided for both the victim and alleged offender during the process.
6. The alleged offender will be placed on administrative leave during the process and is to have no contact with the reporter/victim during the course of the process.
7. Due diligence will be taken to determine if there are additional victims.
8. The same careful investigative process will be followed for child-to-child cases.
9. C&MA Policy on Discipline shall be followed if the report proves to be untrue. A draft statement of finding shall be made, shared with the parties involved, and placed in a permanent, confidential file.
10. Secure record-keeping will be maintained of all reports, internal investigations, and findings regardless of the conclusion reached, in accordance with current policies on the confidentiality of personnel information.
11. The National Office will pay for all internal investigation team expenses for those team members sent from the United States. This will include such things as transportation, food and lodging prior to commencing the internal investigation in the affected Field as well as any investigative travel within the U.S.

The Field will pay for the internal investigation team lodging and meals on the Field and local transportation on the Field.

Investigation Steps

Forming the Investigation Team and Notifying Appropriate Administrators

1. The Field Director (or the Team Leader in conjunction with the Regional Director) shall appoint the investigation team in accordance with the Policy on Discipline in consultation with Regional and National Office leadership.
2. In investigations that involve staff or children from another organization, the Field Director (or Team Leader where appropriate) will make contact with the other organization before proceeding.
3. The Field Director will notify the Regional Director and the Vice President of IM or his designee.
4. The investigation team's lead investigator will provide a copy of the Child Safety Procedures to any members of the affected organization.
5. Field and observers/consultants from other organizations serving on the investigation team.

Planning for the Investigation process

6. The investigation team will review the Child Abuse or Neglect Report, all additional information gathered during the preliminary inquiry stage, and any other relevant documents.
7. The investigation team will develop a preliminary plan.

Alleged offender accountability and support

8. The Field Director (or the Team Leader in conjunction with the Regional Director) will place the alleged offender on administrative leave and may move the alleged offender to another location.
9. National Office and Regional leadership will establish support and accountability for the alleged offender and family.
10. The Field Director will determine, in consultation with the Regional Director and National Office, whether civil child abuse authorities should be notified at this stage, and if so, the Field Director or the Regional Director will do so.

Victim support

11. National Office and Regional leadership will set up support for the victim(s) and family(ies).

Interview process - In accordance with the Discipline Policy:

12. All interviews will have, at least, two investigation team members present. This helps to provide that the session is remembered accurately. The second person is also the one who transcribes the interview. It is important that the interview is transcribed accurately and fully, recording both the questions asked and the individual's responses in their own words, and if possible that the person being interviewed signs the transcribed interview.
13. The investigation team will interview all those who may have relevant information that may contribute to the internal investigation.
14. The investigation team will take steps to determine if there are additional victims, and, if additional victims come to light, will provide support and safety for them and will interview them.
15. The investigation team will prepare an investigative summary as the internal investigation progresses, utilizing that to determine additional interviews needed.
16. The investigation team will interview the alleged offender and spouse, and children if indicated.
17. The investigation team will do follow-up interviews with the victim(s), alleged offender, or others interviewed as needed. The investigation team will complete an investigative summary and send to the ecclesiastical authority. It should contain the following information: The dates and location of the investigation, the investigation team members involved, the alleged offender's name, summary statistics on the investigative process, a brief description of the number of and types of incidents reported, a summary of each victim, alleged offender, and witness statement, and a summary of the outcome of the internal investigation.

Discipline proceedings in accordance with the Policy on Discipline and reporting to authorities

18. If the charge is substantiated, the ecclesiastical authority will convene a discipline hearing in accordance with the Policy on Discipline.

19. The Field Director or Regional Director, in consultation with other relevant parties, reports the abuse to relevant civil authorities.

Informing and debriefing the affected Field

20. The Field Director, in consultation with the Regional Director and National Office, issues an outcome notice to the affected Field as appropriate.

21. The Field Director and Regional Director together debrief appropriate groups.

Closure of files and review of process

22. The Field Director and Regional Director insure that all investigative documents have been sent to the National Office.

Follow-up Procedures

The Field Director (and/or the Team Leader) and Regional Director, in consultation with IM leadership and the Sensitive Issues Consultative Group, will create a written action plan that clearly explains the steps of follow up care that are needed for each of the parties involved. Follow-up care could include a range of options involving professional counseling, retreats, spiritual resources, mentoring, etc.

It is vital that the victim and their parents cooperate with the action plan that the C&MA puts in place so that the victim receives appropriate care for healing to begin. If the victim's family is not willing to follow the action plan, they jeopardize their relationship with the C&MA.

If the offender's employment has not been terminated from the mission, he/she must follow ALL the steps laid out in the action plan in order to remain a part of the C&MA.

Member Care

Appropriate administrative and member care will be made available to the victim of child abuse and his/her family. Appropriate administrative and member care will be provided to the reported offender and his/her family. Appropriate follow-up and administrative and member care will be provided to the affected Field.

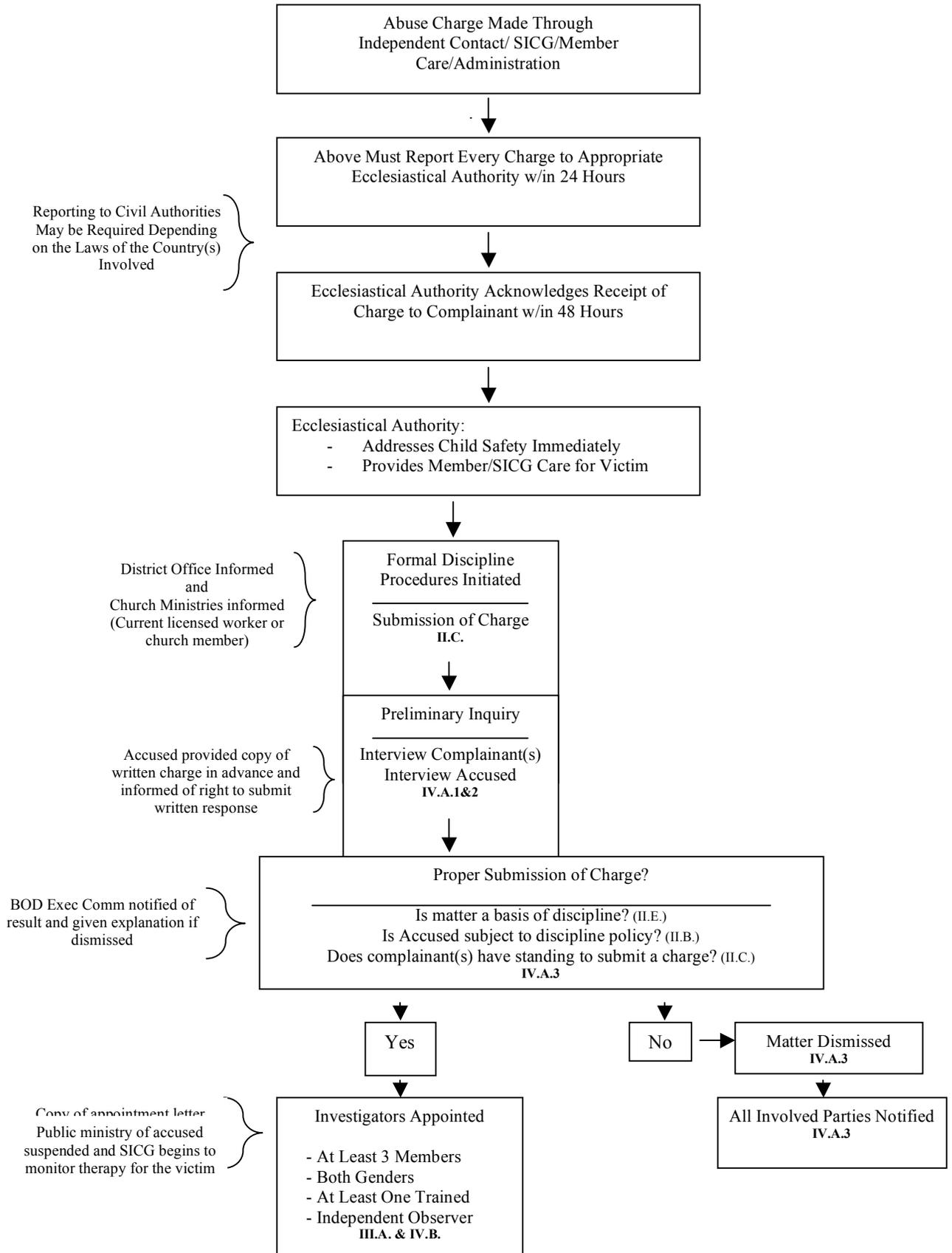
Counseling

Appropriate specialized counseling is made available to the victim of child abuse and his/her family. Appropriate specialized counseling is made available to the reported offender and his/her family.

The C&MA's Therapy Process Guidelines provide details on the provision of counseling in cases of child abuse.

Exhibit A

National Office Abuse Charge Process Chart



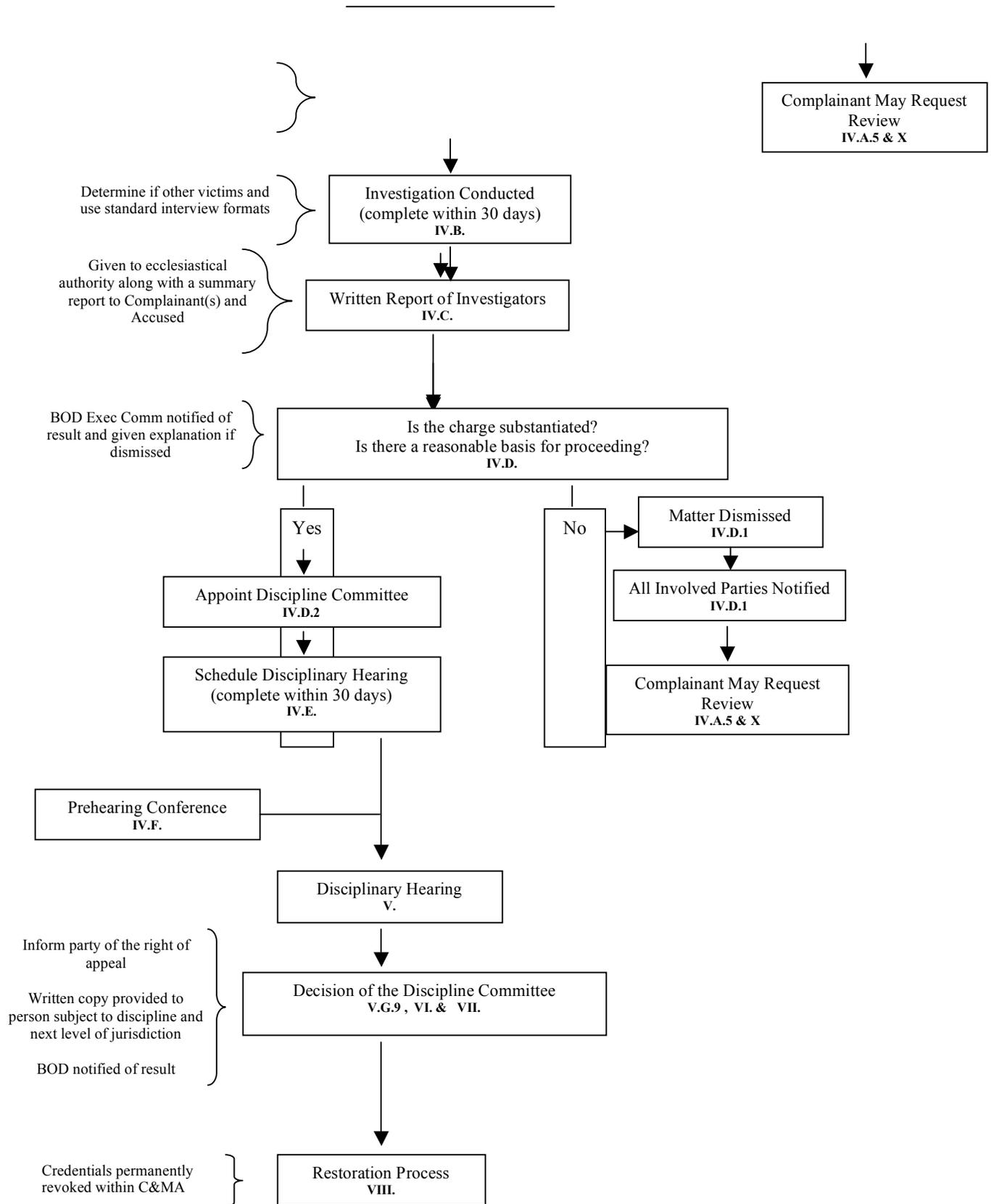


Exhibit B

Child Abuse or Neglect Reporting Form

This report should be completed for every alleged abuse or neglect report no matter how minor, how preliminary, and even if the offender is a minor. It is to be submitted to the Field Director (or Regional Director when appropriate) and clearly marked CONFIDENTIAL within 24 hours. Field Director then submits it to the Regional Director and National Office designee within 24 hours.

E-mail:

Phone:

Confidential Fax:

Date of report:

Person making report, position & relationship to victim:

Date abuse reportedly occurred:

Field/region making the report:

Identified Victim

Child/victim's name:

Gender: M F

Birthdate:

Age:

Grade in school:

Primary language:

Parents:

Address:

Phone:

Parents' primary organization and home country:

Names and ages of other siblings:

Alleged Offender

Alleged offender's name:

Gender: M F

Birthdate:

Age:

Primary Language:

Job:

Relationship to identified victim:

Address:

Phone:

Primary organization and home country:

Field Information

Supervisor receiving report (name and position):

Field Director's name:

Phone Number:

Email:

Report

Date, time and setting in which you became aware of the suspected abuse/neglect:

What led you to suspect/become aware of the abuse/neglect?

Describe what occurred specifically, including where, when, specific actions, number of times it occurred, any threats, etc. Please include actual statements made/heard if possible.

Date, time and setting of incident (if known):

Anecdotal records that support suspicion of abuse/neglect?

Previous reports

Are you aware if the perpetrator has been accused or convicted of other abuse/neglect in the past? If so, please describe:

Are you aware if the child/victim has experienced other abuse/neglect in the past? If so, please describe:

Other victims

Who might be potential other victims? (classmates, siblings, others who were in the same location, attended the same event, etc.):

Others with knowledge of the report

Who else knows about the alleged abuse/neglect? List name, relationship to the victim, job, phone.

Was it reported to a government, law enforcement or child protective service agency? If so, list agency name, name of person the report was given to, agency address, phone number, email address. Also list name, job, and phone number of the person who gave the report, and the report reference number if known.

Family dynamics

Describe the parents' relationship, interaction with the child.

Describe the parents' reaction to the child's report.

Support system

Describe the family's support system (relatives, community, church, etc.)

Describe any arrangements that have already been made for counseling, and/or support for the family.

Arrangements for safety

Describe the arrangements that have been made to ensure the child's safety (both from the alleged offender and to protect the child from repeating the sexual behavior with other children).

Describe the awareness building/education of the parents regarding the seriousness of the report, the Agency's response procedures, etc.

Additional information

Exhibit C

Code of Conduct for Child Safety

Preface

The welfare and safety of children are paramount to The Christian and Missionary Alliance (C&MA) as reflected in its policies and procedures. This includes valuing them, regarding them positively, and treating them with respect and care at all times. Adult staff and volunteers assume the full burden of setting and maintaining clear, appropriate boundaries in all interaction with children.

The most effective way to prevent abuse of children is to be vigilant. By being vigilant in adhering to the following standards for interaction with children we hope to protect them from abuse.

All staff and volunteers who have roles with children are expected to interact with children in a mature, capable, safe, caring, responsible manner, with a high level of accountability. All adult staff and volunteers are responsible for giving and accepting feedback from others in order to maintain our high level of professionalism.

This Code of Conduct includes, but is not limited to the following expectations of staff and volunteers.

Code of Conduct

Visibility

All work with children shall be planned in a way that minimizes risks as far as possible. This includes being visible to other adults when working with children.

This can be accomplished by planning activities in areas where other adults are present and at a time when other activities are occurring. It can also be accomplished by installing windows in all classrooms and other rooms occupied by children or keeping doors open.

Overcoming Isolation

At least two unrelated adults shall be present in work with children. When this is not possible, reduce isolation by having a minimum of two children present, informing the child's parent of your meeting, and doing it during a time and/or in a location where your interaction with the child is visible to others. Isolation could be overcome, for example, by taking two or more children to the bathroom together rather than only one, dropping off siblings last in a carpool, or taking your own child or spouse along when providing rides, or having two or more children over to your home. We expect an adequate number of adults to supervise youth events, especially overnight activities.

Accountability

When ministry to a child involves one-on-one contact, the following procedures shall be followed, as applicable. Always be accountable to other adults regarding your interactions with youth or children.

Counseling or other necessarily confidential meetings with children shall be done in an office with a window in the door and only when another adult is in close vicinity, aware that the meeting is occurring, and willing to stay in the vicinity until it is completed.

Parents and/or supervisors are to be notified beforehand of any activities with youth or children. For example, before transporting a youth or child, keeping a child after school or a youth activity, or when tutoring a child or youth.

In an emergency situation, find someone to go with you if at all possible, or notify whoever is available.

Supervision

Supervision also reduces risk. Program administrators shall periodically and randomly inspect classrooms, offices, work areas and other areas where children and adults are together.

Technology

Technology should be used appropriately to protect children or youth from abuse and exploitation, for example, to prevent downloading pornographic material from the Internet, access to inappropriate emails, chat rooms, or movies.

Discipline

Discipline should be used to teach and correct rather than punish. It should not include slapping, hitting, shaming, yelling at, or belittling a child.

Touch

Because healthy, caring touch is valuable to children but unhealthy touch is abusive, the following guidelines apply. Touch shall be open rather than secretive. A hug in the context of a group is very different from a hug behind closed doors. Touch should be in response to the need of the child, and not the need of the adult. Touch should be age-appropriate and generally initiated by the child rather than the adult. It should be with the child's permission and any resistance from the child should be respected. Touch should always communicate respect for the child. Adults should avoid doing things of a personal nature for children that they are able to do for themselves, including dressing, bathing, etc.

Adults and other youth or children should not hit, slap, pinch, push, hold against their will, or otherwise assault children.

The following signs of affection are generally appropriate within specific contexts: verbal praise, side hugs, shoulder to shoulder hugs, pats on the shoulder, back, or head (when culturally appropriate). For smaller children, touching their hands, faces, shoulders and arms, arms around their shoulders, hugs, or holding them when others are present.

The following behaviors between staff or volunteers and children are inappropriate or may be perceived as inappropriate and shall not be engaged in: touching buttocks, chests, genital areas, or thighs; showing affection in isolated areas or when alone with a child; sensual massages; sleeping in bed with a child; inappropriate comments that relate to physique or body development; flirtatious or seductive looks; any form of affection that is unwanted by the child; showing sexually-suggestive videos or playing sexually-suggestive games with any child; any behavior that could be interpreted as sexual in nature.

Team members shall monitor each other in the area of physical contact, helping each other by pointing out anything that could be misinterpreted.

Verbal Interaction

Words can also be used to support and encourage a child, such as praise, positive reinforcement, and appropriate jokes. Inappropriate verbal interaction includes the following: shaming, belittling, humiliating, name calling, using harsh language that may frighten, threaten or humiliate the child, cursing, or making derogatory remarks about the child. Adults shall avoid favoring or showing differential treatment to particular children or youth to the exclusion of others.

Inappropriate verbal interaction also includes telling off-color or sexual jokes, making sexually suggestive comments, telling inappropriate secrets, or inappropriately discussing sexual encounters or desires with children.

Parent Involvement

In schooling situations, parents shall be informed of planned school or dorm activities (e.g. trips included in the schedule for the term) and sign a consent form. Parents shall be encouraged to make unannounced visits to program activities, as this also reduces the risk of abuse.