

The Luc Cochran Foundation

GOVERNANCE & TRANSPARENCY

Policies & Procedures Manual

Operating standards for staff, volunteers,
and program delivery.

PUBLISHED BY	The Luc Cochran Foundation Inc.
DOCUMENT	Policies & Procedures Manual
EDITION	Revised September 2026
APPLIES TO	Governance & transparency

The operating companion to the Governance Handbook, covering conduct, participant services, program procedures, records, and finance.

How to use this manual

This manual is the operating companion to the Governance Handbook. The Handbook describes who decides; this manual describes how the work gets done day to day. It applies to directors, officers, staff, volunteers, interns, and contractors acting on behalf of the foundation.

Each section states the standard, then the procedure. Where a full standalone policy document exists, this manual summarizes it and points to the controlling document. In any conflict, the standalone policy and the Bylaws control.

Standalone policy	Where to find it
Conflict of Interest Policy	/reports/tlcf-conflict-of-interest-policy.pdf
Whistleblower Policy	/reports/tlcf-whistleblower-policy.pdf
Document Retention & Destruction Policy	/reports/tlcf-document-retention-policy.pdf
Nondiscrimination Policy	/reports/tlcf-nondiscrimination-policy.pdf
Privacy Policy	luccares.org/privacy
Terms of Service	luccares.org/terms
Accessibility Statement	luccares.org/accessibility
Volunteer Handbook	/reports/tlcf-volunteer-handbook.pdf

1. People and conduct

1.1 Code of conduct

Everyone acting for TLCF treats participants, colleagues, and partners with respect and honesty; follows program safety rules; protects confidential information; avoids conflicts of interest; and represents the foundation accurately. Harassment, discrimination, intimidation, dishonesty, and impairment while serving are grounds for immediate removal.

1.2 Nondiscrimination and accommodation

TLCF does not discriminate in programs, volunteering, or employment on the basis of race, color, national origin, ancestry, religion, sex, sexual orientation, gender identity or expression, age, disability, marital or familial status, military or veteran status, genetic information, or any other status protected by law. Accommodation requests are made to hi@luccares.org and are handled promptly and confidentially.

1.3 Screening and onboarding

1. Application and role match.
2. Reference check appropriate to the role.
3. Background screening for any role with access to minors, vulnerable adults, funds, or participant records.
4. Signed acknowledgment of the code of conduct, confidentiality agreement, and applicable releases.
5. Role-specific training before first unsupervised service.

1.4 Supervision and boundaries

- Two-adult rule for all activities involving minors or vulnerable adults.
- No unsupervised transportation of a participant without prior written authorization.
- No personal gifts, loans, or private financial arrangements with participants.
- Program communication occurs through TLCF channels, not personal accounts, where feasible.
- Personal social media connections with participant minors are prohibited.

1.5 Corrective action

Concerns are addressed through coaching, written warning, reassignment, suspension, or removal, proportionate to the conduct. Safety violations and dishonesty may result in immediate removal without prior steps. Decisions may be appealed in writing within 30 days.

2. Participant services

2.1 Intake and enrollment

Enrollment collects the minimum information needed to deliver and evaluate the service. A parent or legal guardian must enroll any participant under 18 and sign the applicable consents. Participants are told what information is collected, why, and with whom it may be shared.

2.2 Attendance

Scheduled sessions are held for the participant. Repeated no-shows without notice may release the slot to someone on the waitlist. Notice of a cancellation should be given as early as possible.

2.3 Waitlists and prioritization

When demand exceeds capacity, placement considers date of request, urgency of need, program fit, and continuity for participants already engaged. Waitlisted individuals are told their status and offered alternatives from the resource directory.

2.4 Dismissal and appeal

A participant may be dismissed for conduct that endangers others, repeated serious disruption, or material misrepresentation of eligibility. Dismissal is communicated in writing with the reason and the appeal route. Appeals are submitted within 30 days and decided by someone not involved in the original decision.

2.5 Grievances

Participants may raise concerns at any time to hi@luccaes.org. Concerns are acknowledged within five business days, investigated proportionately, and answered in writing. Raising a concern never affects access to services.

3. Program-specific procedures

3.1 Tutoring and mentorship

- Sessions occur in visible, supervised settings, in person or on a monitored platform.
- Tutors document attendance and a brief progress note after each session.
- Tutors do not complete a student's graded work, and do not diagnose learning disabilities.
- Concerns about a student's welfare are escalated the same day.

3.2 Digital skills and device loans

- Devices are inventoried by serial number and issued under a written loan or transfer agreement.
- All devices are sanitized before issue and again on return.
- Participants are trained on basic security, phishing, and account recovery before receiving a device.
- Loss, theft, or damage is reported promptly; TLCF does not pursue participants for reasonable wear.

3.3 Food distribution

- Cold chain is maintained and temperatures logged for perishable items.
- Volunteers handling food follow hand hygiene, glove, and illness-exclusion rules.

- Allergen labeling remains with the product; we do not repackage into unlabeled containers.
- Damaged, expired, or unsafe items are removed from distribution and disposed of properly.
- Recipients are served without means testing beyond what a funder requires.

3.4 Career readiness

- Coaching is advisory. TLCF does not guarantee placement and does not act as an employment agency.
- Participant documents are handled confidentially and deleted when no longer needed.
- Employer introductions are made only with the participant's consent.

3.5 Events and offsite activity

- Every activity has a named lead, an emergency contact list, and a first aid kit on site.
- Participant rosters and emergency contacts travel with the lead and are destroyed after the event.
- Incidents are documented on the day they occur and reviewed by leadership.

4. Information, records, and technology

4.1 Confidentiality

Participant, donor, volunteer, and partner information is confidential. Access is limited to those who need it to do their work. Confidentiality obligations continue after service with TLCF ends.

4.2 Records and retention

Records are retained and destroyed under the Document Retention and Destruction Policy. Corporate records, minutes, and tax filings are retained permanently. Program and personnel records are retained for their stated period and then destroyed securely. Destruction is suspended immediately when litigation or an investigation is reasonably anticipated.

4.3 Data security

- Unique accounts, strong passwords, and multi-factor authentication where available.
- Participant data is stored in approved systems, never in personal accounts or unmanaged devices.
- Paper records containing personal information are locked when unattended and shredded when retired.
- Suspected breaches are reported immediately to the Secretary and Executive Director, contained, assessed, and notified as required by law.

4.4 Media, photography, and social media

No participant is photographed, filmed, or identified without a signed release, and a parent or guardian must sign for anyone under 18. Personal social media posts must not disclose participant identities, locations, or circumstances. Only authorized representatives speak for TLCF.

4.5 Artificial intelligence and third-party tools

Do not enter participant, donor, or confidential organizational information into consumer AI tools or unapproved third-party services. New tools that touch personal data require review before adoption.

5. Financial and administrative procedures

5.1 Gift acceptance

Cash and in-kind gifts are accepted under the standards in the Donor Guide and In-Kind Donation Guide. Non-standard assets, gifts with conditions, and gifts that could impair our tax status or reputation are referred to the Board or its designee.

5.2 Receipts and acknowledgment

Every gift is recorded and acknowledged. Written acknowledgment is issued for gifts of \$250 or more and includes the legal name, EIN, date, amount or description, and a goods-and-services statement.

5.3 Expenditures

- Purchases follow the approved budget; out-of-budget spending requires prior approval.
- Two people are involved in any disbursement above the threshold set by Board resolution.
- Receipts are required for reimbursement and submitted within 30 days.
- Organizational funds and cards are never used for personal expenses, even temporarily.

5.4 Restricted funds

Restricted contributions are tracked separately and released only for their designated purpose. Any proposed change of purpose requires donor consent or, where the donor cannot be reached, Board action consistent with law.

5.5 Conflicts of interest

Directors, officers, and key personnel complete an annual disclosure statement and disclose new conflicts as they arise. Interested parties do not participate in the deliberation or vote on the transaction, and the recusal is minuted.

5.6 Partner and vendor agreements

Recurring partnerships, data sharing, site hosting, and vendor relationships are documented in writing, signed by an authorized officer, and reviewed for insurance, privacy, and termination terms before execution.

5.7 Policy review

This manual is reviewed periodically and updated after any material change in program scope, structure, or law. The Secretary maintains the controlling version and records each revision.

How to reach us

General	hi@luccares.org
Toll-free	833-TLCF-NOW (833-852-3669)
Local	770-678-1667
Office	1560 Commercial Court, Suite H, Jonesboro, GA 30238
Website	luccares.org
Programs	luccares.org/programs
Partnerships	luccares.org/partners
Donations	luccares.org/donate
Resource directory	luccares.org/resources
Digital Foundations course catalog	www.digitalfoundations.app

Office hours are by appointment. Program schedules vary by season; confirm current times before referring someone or visiting in person.

Verify our nonprofit status

The Luc Cochran Foundation Inc. is a Georgia nonprofit corporation and a 501(c)(3) tax-exempt public charity, EIN 99-1959689. Our status and filings can be verified through the IRS Tax Exempt Organization Search, the Georgia Secretary of State business search, and our Candid (GuideStar) profile.