

## Whistleblower Policy

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### Purpose

To establish a process by which an employee may disclose conduct that the employee reasonably believes violates law, honest accounting practices, or Catholic Community Service's Personnel Policies and Procedures.

### Policy

#### **Definition of Terms**

**Whistleblower:** An employee of Catholic Community Service who reports an activity that the employee reasonably considers to be a violation of Federal, State, or local laws or a violation of Catholic Community Service's Personnel Policies and Procedures.

**Accounting Matters:** Includes but is not limited to:

- Improper accounting or auditing;
- Fraud;
- Breaches of Catholic Community Service's financial and/or internal controls; and
- Fraudulent financial reporting.

**Violations of Personnel Policies and Procedures:** Includes but is not limited to:

- Acceptance of gifts (other than those gifts permitted under Catholic Community Service's Conflict of Interest Policy), tips, bribes, or kickbacks;
- Sexual or other forms of harassment directed against another employee or a client;
- Drug or alcohol use in violation of Catholic Community Service's Drug-Free Workplace Policy;
- An act or threat of violence;
- Unacceptable use of the internet or Catholic Community Service's e-mail; and
- Disclosure of confidential information in violation of Catholic Community Service's policies on confidentiality.

**Violations of Federal State or Local Laws:** Includes but is not limited to:

- OSHA violations; and
- Violations of wage and hour laws.

# Catholic Community Service Personnel Policies and Procedures

## **Making a Disclosure**

An employee who becomes aware of any Accounting Matter, Violation of Personnel Policies and Procedures, or Violation of Federal, State, or Local Laws (hereafter "Investigation Matter") shall report the Investigation Matter as soon as practical after becoming aware of the conduct. An employee may report an Investigation Matter to his/her supervisor, the Human Resource Manager, or the Executive Director.

The whistleblower is not responsible for investigating the activity or for determining fault or corrective measures. Instead, appropriate management officials at Catholic Community Service are charged with this responsibility.

The Human Resource Manager will investigate the allegations and, in cooperation with the appropriate management officials, will take any necessary corrective action that is deemed appropriate. An employee reporting an Investigation Matter will be asked to sign a written statement concerning the Investigation Matter as part of the investigative process.

When an employee does not feel comfortable addressing an Investigation Matter to his/her supervisor, the Human Resource Manager or the Executive Director, the employee may report the Investigation Matter in writing to a member of the Board of Directors. That Board Member will make a report of the Investigation Matter to the Board of Directors at the next scheduled Board Meeting in an Executive Session. The Board of Directors will determine the appropriate Board Committee to investigate the allegations. The Board Committee will nominate a member of that committee who does not have a conflict of interest in the Investigation Matter (the "Handling Director") to be in charge of the investigation. The Handling Director and/or his or her designees will conduct an investigation into the allegations and will take any necessary corrective action that they deem appropriate. The Handling Director will make a report of the investigation and corrective action to the Board of Directors at the next board meeting in an Executive Session following the conclusion of the investigation and corrective action.

## **False Allegations of Wrongful Conduct Made Knowingly by an Employee**

An employee who knowingly makes false allegations of wrongful conduct concerning an Investigation Matter shall be subject to discipline, up to and including termination of employment.

## **Protection against Retaliation for Making a Complaint in Good Faith**

Catholic Community Service prohibits retaliation against any employee who, acting in good faith, has made a report under this policy or has disclosed any information that the employee reasonably believes constitutes an Investigation Matter. Accordingly, no employee with authority to make or materially influence significant personnel decisions shall take or recommend an adverse personnel action against an employee in retaliation for reporting alleged wrongful conduct.

# Catholic Community Service Personnel Policies and Procedures

Any employee found to have violated this non-retaliation policy shall be disciplined, up to and including termination of employment.

Nothing in this policy shall, however, protect an employee who has made a complaint or disclosed information under this policy from adverse employment action based upon reasons separate and apart from the employee's complaint or disclosure of information relating to an Investigation Matter.

## **Retaliation Complaints**

As soon as an employee is notified or becomes aware of an adverse personnel action against him or her and if the employee believes the action was based on his or her prior good faith complaint about conduct the employee reasonably believed constituted an Investigation Matter, he or she may protest the action by filing a written complaint in accordance with the Catholic Community Service Grievance Policy.

## **Retention of Reports**

Any allegation submitted and investigation performed under this policy shall be retained in confidential files by Catholic Community Service for a period of seven years from the date the matter was resolved. A summary of the investigation report shall be placed in the personnel file of any employee who is found to have engaged in wrongful conduct pursuant to an investigation or who has knowingly submitted a false report of wrongful conduct.

## **Scope**

All Catholic Community Service employees.