



ARCHDIOCESE OF SAINT PAUL AND MINNEAPOLIS
CLERGY BULLETIN

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POLICY ON REPORTING WRONGDOING
("WHISTLEBLOWER" PROTECTION POLICY)

Reverend and dear Fathers and Deacons,

The Archdiocese of St. Paul and Minneapolis (Archdiocese) requires all clergy, educators, parish and archdiocesan staff and volunteers and employees to observe the highest standards of personal ethics in the conduct of their duties and responsibilities. As employees and representatives of the Archdiocese, they must be honest and act with integrity in fulfilling their responsibilities and in compiling with the applicable Archdiocesan codes of conduct and canon and civil laws and regulations.

This Whistleblower Policy is intended to encourage and enable employees and others to raise serious concerns internally so that the Archdiocese can address and correct inappropriate conduct and actions. It is the responsibility of all board members, officers, employees and volunteers to report concerns about violations of the Archdiocese's code of conduct or suspected violations of law or regulations that govern Archdiocesan operations.

This policy, which is to take effect on November 3, 2014, is applicable to all clergy, educators, parish and archdiocesan staff and volunteers and employees.

Given at Saint Paul, Minnesota, this 24th day of October, in the year of Our Lord 2014.
All things to the contrary notwithstanding.

The Most Reverend John C. Nienstedt
Archbishop of Saint Paul and Minneapolis

Susan Mulheron
Chancellor for Canonical Affairs

I. Reporting Procedure

The Archdiocese has an open door policy and suggests that employees share their questions, concerns, suggestions or complaints with their supervisor. If you are not comfortable speaking with your supervisor or you are not satisfied with your supervisor's response, you are encouraged to speak with any department manager or with one of the Vicars. Supervisors and managers are required to report complaints or concerns about suspected ethical and legal violations in writing to the Director for Ministerial Standards and Safe Environment, who has the responsibility to investigate all reported complaints. Employees with concerns or complaints may also submit their concerns in writing directly to their supervisor or Director of Ministerial Standards and Safe Environment.

The Director of Ministerial Standards and Safe Environment is responsible for ensuring that all complaints about unethical or illegal conduct are investigated and resolved. The Director of Ministerial Standards and Safe Environment will advise the Vicar General/Moderator of the Curia of all complaints and their resolution.

The Archdiocese will notify the person who submitted a complaint and acknowledge receipt of the reported violation or suspected violation. All reports of misconduct will be properly investigated and appropriate corrective actions will be taken if warranted by the investigation.

II. Confidentiality

Reports of misconduct, and investigations pertaining thereto, shall be kept confidential to the extent possible, consistent with the need to conduct a proper investigation. Disclosure of reports of misconduct to individuals not involved in the investigation will be viewed as a serious disciplinary offense and may result in disciplinary action for employees up to and including termination. Volunteers, trustees, and other persons in positions of influence who disclose reports of misconduct to individuals not involved in the investigation may be asked to resign or be removed from their position. Such conduct may also give rise to other actions, including civil lawsuits.

III. No Retaliation

This policy is intended to encourage and enable those identified above to raise concerns for investigation and appropriate action. With this goal in mind, no Archdiocesan officer, trustee, or employee, or volunteers or member of an advisory board or council who, in good faith, reports a concern shall be subject to retaliation or, in the case of an employee, adverse employment consequences. Moreover, employees who retaliate against someone who has reported a concern in good faith may receive disciplinary action up to and including termination. Volunteers, trustees, and other persons in positions of influence who retaliate against someone who has reported a concern in good faith may be asked to resign or be removed from their position.

IV. Acting in Good Faith

Anyone reporting a concern must act in good faith and have reasonable grounds for believing the information disclosed is accurate and indicates a violation. The act of making allegations that prove to be unsubstantiated, and that prove to have been made maliciously, recklessly, or with the foreknowledge that the allegations are false, will be viewed as a serious disciplinary offense and may result in disciplinary action for employees up to and including termination. Volunteers, trustees, and other persons in positions of influence who make allegations that prove to be unsubstantiated, and that are proven to have been made maliciously, recklessly, or with the foreknowledge that the allegations are false may be asked to resign or be removed from their position. Such conduct may also give rise to other actions, including civil lawsuits.