I. Purpose

This Whistleblower Policy is intended to encourage and enable employees, clergy, Adult Volunteers, parishioners, board members and others to raise serious concerns, including reporting sexual abuse of a minor, suspicions of sexual misconduct or other illegal or inappropriate behavior, so that the Archdiocese can address and correct inappropriate conduct and actions. It is the responsibility of all employees, clergy, Adult Volunteers, parishioners, board members and others 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 prohibits retaliation against any Cleric, employee, Adult Volunteer, parishioner or other individual who acts in good faith.\(^1\) This policy pertains to the Archdiocese as a corporate entity and not the territorial entity of the Archdiocese Territory and should be followed in accordance with the Minnesota Whistleblower Act, MN State Statute § 181.932.

II. Definitions

"Adult Volunteer" means an adult volunteer for the Archdiocese or a Parish or School who has regular or unsupervised contact with unrelated minors.

"Archdiocese" means that certain corporate entity formed, maintained and existing under Minnesota Section 315.16 with Minnesota Business Name: “The Archdiocese of St. Paul and Minneapolis”.

"Archdiocese Territory" means the twelve (12) counties of the greater Twin Cities metropolitan area: Ramsey, Hennepin, Washington, Dakota, Anoka, Carver, Wright, Scott, Chisago, LeSueur, Rice, and Goodhue; and those persons outside the geographical territory over whom the Archdiocese has the ability to direct or control.

"Director" mean the Archdiocese employee responsible for managing Archdiocese processes for handling allegations of clergy misconduct and for leading the Office of Ministerial Standards and Safe Environment.

\(^1\) See Settlement Agreement, section 6.7, dated December 12, 2015 between the Archdiocese of St. Paul and Minneapolis and Ramsey County Attorney, Ramsey County District Court File No.: 62-JV-15-1674; County Attorney File No.: 2138749.

FAITH + HOPE + LOVE
“Clergy” means any persons ordained – bishops, priests, and deacons – who administer the rites of the Catholic Church.

“Cleric” means a member of the Clergy.

“Code of Conduct” means the Code of Conduct for Clergy, the Code of Conduct for Church Personnel, the Code of Conduct for Adult Volunteers, and the Code of Conduct for Youth Volunteers, as applicable.

“Vicar General/Moderator of the Curia” is the priest appointed by the Archbishop to fulfill that office for the Archdiocese.

III. Policy

I. Reporting Procedure

Archdiocesan Clergy, employees and volunteers must report information regarding misconduct, including suspicions of sexual abuse of a minor. The Archdiocese recommends that employees report their concerns or complaints regarding suspected misconduct to their supervisor. If an employee is not comfortable speaking with their supervisor, or is not satisfied with the supervisor’s response, the employee is encouraged to speak with any other supervisor or with the Vicar General. Supervisors and managers shall report complaints regarding suspected misconduct to the Director. Archdiocesan Clergy, employees and volunteers with concerns or complaints may also submit them directly to the Director.

The Director is responsible for ensuring that complaints regarding suspected misconduct are investigated and resolved. The Director will advise the Vicar General/Moderator of the Curia of complaints and their resolution.

The Archdiocese will notify the person who submitted a compliant and acknowledge receipt of the reported violation or suspected violation. All reports of misconduct will be properly investigated and 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 is a serious offense and may result in disciplinary action for employees up to and including termination. Volunteers, trustees, and other persons who disclose reports of misconduct to individuals not involved in the investigation may be asked to resign or be removed from their position.

III. No Retaliation

No Archdiocesan Cleric, employee or volunteer 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 be disciplined, up to and including termination. Volunteers, trustees, and other persons 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, is a serious offense and may result in disciplinary action for Clergy and disciplinary action for employees up to and including termination. Volunteers, trustees, and other persons 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.