



**POLICY: REPORTING OF IMPROPER CONDUCT; FRAUD, WASTE & ABUSE  
("WHISTLEBLOWER")**

Catholic Charities is committed to the highest standards of ethical, moral and legal business conduct. This policy is intended to protect employees who, in good faith, report activities including, but not limited to, fraudulent financial reporting or transactions, client services that are inconsistent with agency policies, or other illegal, improper, wasteful or unethical conduct. This policy provides clear direction how to report alleged improper conduct and to ensure that all allegations are thoroughly investigated and appropriate action taken.

Any employee ("whistleblower") who makes a good faith report is protected against adverse employment actions or harassment, or retaliation for raising allegations of improper conduct. An employee is protected even if the allegations prove to be incorrect or unsubstantiated. Every effort will be made to protect the confidentiality of the employee; however, there may be situations when it cannot be guaranteed.



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**PROCEDURE: REPORTING OF IMPROPER CONDUCT; FRAUD, WASTE & ABUSE  
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1. An employee who reasonably believes that improper conduct is occurring should raise the issue with the agency Privacy Officer and/or his/her chain of command.
2. Employees who believe fraud, waste and/or abuse of agency resources has occurred specifically with grant funding may report such improper conduct directly to the agencies below:

Office of the Inspector General  
U.S. Department of Justice  
Investigations Division  
950 Pennsylvania Ave, NW  
Room 4706  
Washington, DC 20530  
oig.hotline@usdoj.gov  
Hotline: 800-869-4499  
Hotline Fax: 202-616-9881

OR      Kansas Governor's Grant Program  
Landon State Office Building  
Room 304 North  
900 SW Jackson Street  
Topeka, KS 66612-1220

3. Posters providing this information are displayed in each agency facility where they can be easily accessed by all employees. The agency Privacy Officer will ensure that all employees receive this information during initial hire orientation and that posters are displayed in agency facilities 24/7.
4. Any claim of misconduct filed by an employee with the Supervisor or Privacy Officer, will be reviewed by the Privacy Officer, who will respond to the employee within ten (10) working days setting out the intended investigation plan. An investigation may include internal reviews, reviews by external auditors or some other external body.
5. Once the investigation is complete the agency Privacy Officer will inform the whistleblower that an appropriate investigation has been made and any corrective action that has been taken.
6. Employees who believe they are being penalized in any way for reporting wrongdoing or who believe there has been a cover up for the action disclosed; or who do not consider that they have had a satisfactory response to their disclosure should contact the agency Human Resources Director. If the whistleblower believes that the response from the Human Resources Director is unsatisfactory, the employee may contact the Executive Director.
7. If the claim of impropriety is substantiated, appropriate disciplinary action will be taken against the responsible employees(s) up to and including termination of employment.
8. Any act of retaliation of other employee(s) against the "whistleblower" will result in disciplinary action, up to and including termination of employment.



9. The improper use of this policy, such as reports not made in good faith or filed maliciously, will result in disciplinary action against the whistleblower, up to and including termination of employment.