

## C4SO WHISTLEBLOWER POLICY

## If you see something, say something!

Whistleblower Policies are meant to provide a way for an organization's employees or volunteers who observe or experience wrongdoing to be empowered to report it. C4SO's Whistleblower Policy provides important information for any persons outlined below who believe that illegal or unethical practices are taking place within C4SO to report such observations.

- A. <u>Application</u>. This Whistleblower Protection Policy applies to all of the Diocese of Churches for the Sake of Others' (the Organization's) staff, whether full-time, part-time, or temporary employees, to all volunteers, to all who provide contract services, and to all officers and directors, each of whom shall be entitled to protection ("protected persons").
- B. <u>Reporting Credible Information</u>. A protected person shall be encouraged to report information relating to illegal practices or violations of policies of the Organization (a "Violation") that such person ("the reporter") in good faith has reasonable cause to believe is credible. A violation constitutes breaking a state or federal statute, noncompliance with a state or federal rule or regulation, or unsafe working conditions or work practices in the employee's or volunteer's work/volunteer environment.

Bishop Todd Hunter has appointed the Rev. Canon Kimberley Pfeiler as Ombudsman for the Organization. Anyone in a C4SO church must report a Violation to the Diocesan Ombudsman (469-766-1272) within 24 hours of becoming aware of the incident. The Diocesan Ombudsman is the reporter's first point of contact. If the reporter is unable to make contact with the Ombudsman in 24 hours, they must call (615-968-5348) and email (admin@c4so.org) the diocesan office for assistance in connecting with her.

Upon speaking with the reporter, the Ombudsman will ask the reporter to complete a Whistleblower Reporting Form, available on the Safe Church Training portion of the Organization's website, to document as much information about the Violation as possible. The Ombudsman will also guide the reporter to next steps, which may include state reporting and notifying the Rector, who will then notify relevant local persons.

Anyone reporting a Violation must act in good faith, and have reasonable grounds for believing that the information shared in the report indicates that a Violation has occurred.

- C. <u>Confidentiality</u>. Reports of Violations or suspected Violations will be kept confidential to the extent possible, with the understanding that confidentiality may not be maintained where identification is required by law or in order to enable the Organization or law enforcement to conduct an adequate investigation.
- D. <u>Protection from Retaliation</u>. No person entitled to protection shall be subjected to retaliation, intimidation, harassment, or other adverse action for reporting information in accordance with this Policy. Any person entitled to protection who believes that he or she is the subject of any form of retaliation for such participation should immediately report the same as a violation of and in accordance with this Policy.

Any individual within the Organization who retaliates against another individual who has reported a Violation in good faith or who, in good faith, has cooperated in the investigation of a Violation is subject to discipline, including termination of employment or volunteer status.

- E. <u>Dissemination and Implementation of Policy</u>. This Policy shall be disseminated in writing to all affected constituencies. The Organization shall implement this Policy by asking each constituency to take the following steps:
  - (1) Report all violations to the Diocesan Ombudsman (469-766-1272) within 24 hours of becoming aware of the incident.
  - (2) Complete a Whistleblower Reporting Form, available on the Organization's website.
  - (3) If recommended by the Diocesan Ombudsman, work with legal counsel to discuss further proceedings involving the reported Violation.

The procedures for implementation of this Policy shall include the Diocesan Ombudsman communicating with the reporter about the status of the reported Violation, to the extent that the reporter's identity is disclosed, and to the extent consistent with any privacy or confidentiality limitations. However, due to privacy the resolution of the situation may be undisclosed to the reporter.

v.02 (12/2022)