Policy A-3
Ethics and Whistleblower Policy

I.   Introduction

The Catholic Charities of the Archdiocese of Chicago ("Catholic Charities") Ethics and Whistleblower Policy (the "Policy") is a description of the ethical and legal responsibilities of employees of Catholic Charities. It requires employees to observe the highest standards of business and personal ethics in the conduct of their duties and responsibilities for Catholic Charities. Employees of Catholic Charities must practice honesty and integrity in fulfilling their responsibilities and comply with all applicable laws and regulations. All employees will be required to sign the Ethics and Whistleblower Policy Acknowledgement (attached as Exhibit A) upon hire and thereafter as requested by Catholic Charities.

Employees are also required to understand their ethical responsibilities as set out in the Code of Ethics of the Catholic Charities of the Archdiocese of Chicago. (Available on the Catholic Charities’ intranet).

Under this policy employees have a responsibility to notify Catholic Charities when they learn of violations that must be reported under the Policy. This policy does not address every ethical issue that might arise or that employees of Catholic Charities might face. It is not a summary of all laws and policies that apply to Catholic Charities employees and/or business. It does not replace good judgment. Rather, the Policy is designed to give employees of Catholic Charities an overview of ethical issues and obligations that may arise, but it is not limited to the issues addressed in this policy.

Please also remember that employment with Catholic Charities is at will, which means that either Catholic Charities or the employee may terminate the employment relationship at any time for any reason, with or without cause or prior notice. Nothing in this Policy changes the nature of the employment-at-will relationship or creates any contractual rights between Catholic Charities, its employees or any other third party. Catholic Charities reserves the right to determine how the Policy applies to any particular situation, and to amend or modify the Policy as it deems appropriate without prior notice, consultation or agreement.

II.   Employee Responsibilities

A.   Reporting Violations.

Under this Policy, all employees of Catholic Charities are required to immediately report questionable or improper accounting or auditing matters and violations and suspected violations of the law, ethical standards and/or any Catholic Charities’ policy.

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Approved: February 01, 2018
Employees should first discuss violations or suspected violations that are required to be reported under the Policy with their direct supervisor. If an employee is uncomfortable speaking with their direct supervisor, or their direct supervisor has engaged in the violation or suspected violation, the employee should report the violation directly to another manager within their chain of command. If, after reporting, the employee continues to believe that a violation of this policy has occurred and that it has not been addressed, the employee should report the violation to the Senior Vice President of Program Development and Evaluation.

If the employee is uncomfortable speaking directly with the Senior Vice President of Program Development and Evaluation, the employee should contact the Whistleblower Hotline at 1-877-767-7781 or report the violation by e-mail to TellCatholicCharitiesChicago@GetInTouch.com, which is available 24 hours a day 7 days a week.

The Whistleblower Hotline is operated by an outside company, not by Catholic Charities. A call or e-mail to the Whistleblower Hotline is completely anonymous, unless the reporter leaves their name and telephone number for a direct response from Catholic Charities. Unless the reporter indicates otherwise, their name and e-mail address will be removed from any e-mail message before it is sent to Catholic Charities. When calling the Whistleblower Hotline, follow the instructions for leaving a message. State that you are calling from Catholic Charities of the Archdiocese of Chicago. Write down the five-digit case number assigned. Finally, the reporter may call back after five business days for a response, and be sure to have the case number ready.

Whistleblower reports will be forwarded to the Chair of the Risk Management Committee, who may also be the Senior Vice President of Program Development and Evaluation. The Chair will consult with Senior Administration and the Executive Committee of Risk Management, as appropriate, and will forward complaints to the Legal and Compliance Services Department or the Finance Department for investigation unless it is determined that the issue reported is actually a Human Resources issue at which time it will be referred to the Human Resources Department. If the Chair is implicated in a Whistleblower report, the report will be forwarded directly to the Legal and Compliance Services Department.

B. Investigations.

Because of the nature of the process, all reports of violations that are made pursuant to this Policy and investigations thereof will remain confidential to the extent possible, consistent with the need to conduct an adequate investigation, as set forth in greater detail below. All credible reports of violations of this Policy shall be investigated as described in the Catholic Charities' Investigations Policy, A-7. Employees who are contacted related to any investigation should cooperate by always providing truthful and accurate information in response to such investigation and they should never mislead any investigator.
Furthermore, Catholic Charities’ employees should never alter or destroy any documents or records in response to an official request for information or in anticipation of or during an investigation. In some circumstances, Catholic Charities may determine that in order to properly achieve its objectives during an investigation, it is necessary to require confidentiality. If Catholic Charities reasonably imposes the requirement of confidentiality, employees will be expected to comply, and a failure to comply may result in disciplinary action, up to and including termination of employment.

Any employee who is found to have engaged in an improper auditing or accounting practice and/or who has violated the law, ethical standards and/or Catholic Charities’ policy is subject to disciplinary action, up to and including termination of employment.

C. No Retaliation.

Neither Catholic Charities, nor any of its supervisory personnel, will allow any form of retaliation against any employee who raises a concern, asks a question, and makes a report in good faith regarding misconduct that falls under this Policy or participates in an investigation. Persons who retaliate, or attempt to retaliate, will be subject to discipline, up to and including termination of employment.

D. Good Faith.

Anyone reporting under this Policy must act in good faith and have reasonable grounds for believing that improper auditing or accounting practices have occurred, or that there has been a violation of the law, ethical standards and/or Catholic Charities’ policy. Making a report which is unsubstantiated and made with malicious intent (i.e. solely for the purpose of discrediting or retaliating against another staff person), recklessly, or with the foreknowledge that the allegations are false, will be viewed as a serious disciplinary offense and may result in discipline, up to and including termination of employment.


All of Catholic Charities’ financial books, records and accounts must accurately reflect transactions and events, and conform with both generally accepted accounting principles and Catholic Charities’ standards. Undisclosed or unrecorded funds, assets or liabilities are not allowed. Similarly, it is never acceptable for an employee to make false claims on an expense report, to falsify a record of an employee’s time, to falsify a record of services provided to a client, to falsify quality or safety results, to understate or overstate known liabilities and assets, to maintain undisclosed or unrecorded funds or “off the book” assets, or to defer recording items that should be expensed. Employees should never create or destroy records for the purpose of intentionally hiding or disguising the true nature of any transaction.

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Approved: February 01, 2018
F. Employee Personal or Financial Interests.

Employees must avoid situations in which personal or financial interests might interfere with their ability to do their job or that would create even the appearance of a conflict of interest. Employees must avoid situations in which they are acting for their own personal gain rather than in the best interests of Catholic Charities and/or its clients. In particular:

- Employees may not own, either directly or indirectly, a significant interest in any business that does or seeks to do business with Catholic Charities without first obtaining the written approval of Senior Administration. A “significant interest” is an ownership interest greater than 5% of the total net worth by the employee and immediate family members, or greater than 1% of the outstanding equity securities for investments in a public company.

- Employees may not serve on the board of directors, board of advisors or in any other advisory capacity to any business that does or seeks to do business with Catholic Charities without first obtaining the written approval of Senior Administration.

- Employees may not pursue for themselves business or investment opportunities that they discover through the use of Catholic Charities property or information. For example, an employee may not purchase a parcel of real estate where the employee learned of the opportunity through their employment with Catholic Charities and Catholic Charities may also have an interest in purchasing the property.

Employees should consult with their direct supervisor or other members of management if they have any question about a particular transaction.

- Employees should never borrow money from clients; loan money to clients; buy from or sell to clients any service; accept any product, service or money from a client; refer clients to an employee’s relative, significant other, friend or any person with whom there could be a perceived conflict of interest for any service or product; ask clients to sign any petition or form or document unrelated to the services the client may be receiving from the agency; or contact clients about matters unrelated to their receiving services. Also see policy D-5 Staff/Client Relationships.

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• Employees may not accept outside secondary employment or engage in other business arrangements without reviewing and following Catholic Charities’ Conflict of Interest Policy, A-5. Employees should consult with their direct supervisor or the Human Resources Department if they have any questions regarding outside employment.

• Employees are strictly prohibited from accepting payment including but not limited to cash, gift cards or cash equivalents or other consideration from a vendor or provider of services for referring applicants or clients to that vendor or provider of services. Also, employees are prohibited from making payment or other consideration to another individual or entity for the purpose of the individual or entity making a client referral to this agency.

• Employees may never receive compensation from a vendor or business entity with whom the employee is conducting business on behalf of Catholic Charities. For questions about gifts, favors and business entertainment, employees should consult section G of this Policy.

• Employees shall not do business on behalf of Catholic Charities with a vendor or business entity that employs family members or close personal friends without first obtaining the written approval of Senior Administration.

• Employees shall have no direct or indirect financial interest in the assets, business transactions or professional services of the Agency. On a quarterly basis, the Management Information Systems ("MIS") Department shall complete a comparison of the names and addresses of all current vendors in the Accounts Payable system against the names and addresses of all current employees in the Human Resources database. The results of this comparison shall be provided to the Corporate Compliance Officer and the Chief Financial Officer.

Employees shall not use their position for personal financial gain related to ownership or leasing of real estate property unless approved by the Administrator. In situations where an employee does in fact own property leased or rented for the purposes of a Catholic Charities program, a letter of identification and a request for exception shall be addressed to the Administrator of Catholic Charities and approved in writing. The letter shall document that any financial transaction is either at or below current market rates. This letter is to be kept on file in the office of the Chief of Staff. In addition to the quarterly comparison completed by the MIS Department described previously, any time Catholic Charities enters into a new lease or a request is made for a rental payment on behalf of a client of Catholic Charities, the landlord is required to fill out a new vendor form and disclose if they are a current or former employee of Catholic Charities, related to an employee of Catholic Charities or any other potential conflict of interest.

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The intent of the guidelines regarding Employee Personal and Financial Interests is not to restrict Catholic Charities business, or to make it difficult for employees to perform their jobs. Instead, the intent of these guidelines is to help keep Catholic Charities informed about the nature of the business dealings conducted on its behalf by its employees. As a result, employees should consult with their direct supervisor, program director and/or other members of management in accordance with this policy or to the extent they have any questions.


1. In General.

Employees of Catholic Charities must never pay bribes, or provide anything of value in order to influence or to appear to influence the judgment or actions of others. Conversely, employees of Catholic Charities shall not require or accept anything of value from a vendor or other third party providing services to Catholic Charities in order to receive business from Catholic Charities. Employees should always exercise good judgment and moderation in providing business gifts or entertainment.

Generally, in the ordinary course of business, the purpose of business gifts and entertainment is to strengthen business relationships and create goodwill. No gift, entertainment or other personal benefits should be required, requested, provided or accepted by any employee of Catholic Charities or family members of Catholic Charities employees to gain an unfair advantage or a quid pro quo to receive business or other compensation. A gift may only be accepted when:

- It is not cash;
- It is consistent with customary business practices;
- It is not excessive in value;
- It cannot be construed as a bribe or payoff; and
- It does not violate any applicable laws or regulations, ethical standards and/or Catholic Charities’ policy.

Any time an employee receives a gift or benefit and they are concerned that it may not be appropriate and/or that it violates this Policy, they should discuss it with their supervisor, who shall consult, as appropriate, with their chain of command. If an employee is concerned that refusing to accept a gift or other benefit would be detrimental to the client or business relationship, they should accept the gift or personal benefit and advise their supervisor and discuss what to do with the gift or benefit. The supervisor shall consult, as appropriate, with a manager or director within their chain of command.

Any gift or other benefit offered to an employee of Catholic Charities by a client and/or other outside sources, with a value of $50 or more, must be documented in both the client’s record and reported to the employee’s direct supervisor in writing and should include the nature of the gift (e.g., what it is), the value of the gift and from whom it was received by the employee. The employee’s supervisor will notify the employee if the gift should be returned because it is excessive in value or because it is otherwise inappropriate under these guidelines after consultation with the Vice President of their Service Area or other appropriate administrative level personnel. See also Catholic Charities Ethical Conduct in Casework Policy, D-4.


Employees should never request or accept donations or financial assistance for their personal use from any person or business that does business with or that seeks to do business with Catholic Charities. Similarly, an employee should never request, accept, use or misappropriate for their own use and benefit any donation that has been earmarked for Catholic Charities’ clients. If an employee is in need of financial or any other type of assistance, he or she should utilize the Employee Assistance Program to determine if they may qualify for financial or any other type of assistance from Catholic Charities or another agency. If a volunteer, vendor or other third party is in need of financial or any other type of assistance, they should be referred to the appropriate Catholic Charities’ program to determine their eligibility. If any person or business that does business with or that seeks to do business with Catholic Charities wishes to make a donation to Catholic Charities for the benefit of Catholic Charities, employees should direct them to the Development Department so that Catholic Charities may properly process and account for any such donation. However, sites that accept standard donations such as clothes and food should follow their site specific protocols for processing donations.
A. Donation of Tickets to Events

Occasionally, vendors may provide tickets to entertainment or sporting events as a donation to Catholic Charities or as a customary business practice for the purpose of developing a business relationship with an employee of Catholic Charities. These types of donations should be handled as follows:

1. Donation to Catholic Charities
   When a vendor donates tickets to Catholic Charities, they should generally be utilized as auction or raffle prizes by the Development Department for Catholic Charities’ events. However, if the tickets are for immediate use and cannot be utilized by the Development Department due to the timing of Catholic Charities’ events, the employee receiving the tickets should contact the Chief of Staff. The Chief of Staff will confirm that the donor intent allows for use of the tickets by Catholic Charities’ staff. Upon confirmation by the donor, the Chief of Staff will ensure that tickets are rotated amongst the Service Areas and may be distributed to available staff at the discretion of the Service Area Vice President. A record of these donations will be kept by the Chief of Staff or his designee which shall contain the following information: name of donor, type and number of tickets donated and recipients of the tickets.

2. Business Purpose
   When a vendor invites a Catholic Charities’ employee to an event and the tickets are intended for that specific employee based on their business relationship with the vendor, the employee should contact their Service Area Vice President who shall consult with the Chief of Staff to ensure there is no potential conflict or ethics violation. No employee who is involved in an ongoing Request for Proposal (“RFP”) process should accept any type of ticket or other item during this process even if it is a customary business practice.

B. Solicitation of Donations for Catholic Charities’ Events

All solicitations for donations of money or goods to benefit Catholic Charities’ through its programs or events shall be handled through the Development Department. However, the Development Department may request assistance from other Catholic Charities’ staff when soliciting vendors of Catholic Charities’ if the Catholic Charities’ staff have an established business relationship with the vendor and can provide an introduction to or point of contact with the vendor for the Development Department staff.

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Approved: February 01, 2018
H. Employee Use of Catholic Charities Property/Assets.

Employees may only use Catholic Charities property and assets, including but not limited to financial assets, vehicles, office supplies, equipment, computer software, telephone and internet services, voice mail and e-mail, for business purposes. Similarly, employees may only use Catholic Charities’ computers and computer networks and infrastructure in accordance with Catholic Charities’ policies applicable to computer use. Employees should never use Catholic Charities computers or computer network to access, receive or transmit material that is illegal. Employees should never loan, borrow, donate, sell or dispose of any of Catholic Charities’ property unless specifically authorized to do so by management level staff of Catholic Charities. Employees may not use Catholic Charities’ property, information or their position for personal gain. Any acts that involve theft, fraud, embezzlement, or misappropriation of any property are also prohibited.

I. Employee Use of Catholic Charities’ Confidential Information.

Catholic Charities’ Confidential Information should not be divulged or disseminated to any person except as authorized by Catholic Charities and as necessary to fulfill specific responsibilities determined by Catholic Charities. Confidential Information may include but is not limited to, financial information, operating methods, research results, employee information/data, client information/data, information about relationships with suppliers and others as described in the Agency’s Confidentiality Agreement (attached to this Policy as Exhibit B). All employees are also required to read and sign the Agency’s Confidentiality Agreement upon hire and thereafter as requested by Catholic Charities. Employees must comply with the Agency’s Confidentiality Agreement by taking proper precautions when dealing with Confidential Information, complying with all policies, regulations and laws governing confidentiality for their program as well as the Agency and all other requirements as defined in the Agency Confidentiality Agreement.

J. Interaction With Government Officials and Agencies.

Catholic Charities employees must never make payments or offers of anything of value to government officials, political parties or candidates in any attempt to obtain or receive business for Catholic Charities. Any such conduct is strictly prohibited. Furthermore, in general, Catholic Charities does not make political campaign contributions. Any questions regarding the applicability of this rule should be directed to the Chief of Staff or the Legal and Compliance Services Department. To the extent that Catholic Charities employees desire to support candidates of their own choosing, employees must be clear that any such efforts reflect their own views rather than those of Catholic Charities.

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Approved: February 01, 2018
Catholic Charities employees must cooperate with all government agencies and authorities. Employees should immediately forward all requests by any such agencies or authorities for information, other than what is provided on a routine basis, to the Legal and Compliance Services Department. Employees should always provide truthful and accurate information in response to all such requests. Catholic Charities employees should never mislead any investigator. Furthermore, Catholic Charities employees should never alter or destroy any documents or records in response to an official request for information or in anticipation of or during an investigation.

III. Policy References

Many ethical standards for staff are contained in the Agency’s bylaws and other policy statements. Below are some relevant Agency policies.

Though these standards touch on many aspects of our work, there may be situations not covered by this Policy or the standards set out below. If questions arise, employees should contact their supervisor.

General Agency Policies
A-1 Mission Commitment to Charity
A-5 Conflicts of Interest
A-6 Provisions of Services to Employees and Board Members
A-7 Investigations
A-8 Risk Management
A-10 Supervision
A-14 Document Retention and Destruction
A-15 Social Media
A-16 Responding to Subpoenas

Administration Policies
B-5 Corporate Compliance

Human Resources Policies
C-1 thru C-20

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Approved: February 01, 2018
Services to Clients Policies
D-2 Client Record Keeping, Confidentiality and Privacy
D-3 Client Rights and Grievance Procedure
D-4 Ethical Conduct in Casework
D-5 Staff/Client Relationships
D-8 Performance Quality Improvement
D-9 Abuse and Neglect Reporting

Technology Policies
F-1 thru F-21

HIPAA Policies and Procedures (all)

Code of Ethics
The Code of Ethics applies in conjunction with the above stated Ethics and Whistleblower Policy. This document is available on the both the intranet and the internet home page of the Catholic Charities’ webpage

Attached Exhibits:
Exhibit A: Ethics/Whistle Blower Policy Acknowledgement
Exhibit B: Confidentiality Agreement
Exhibit C: Summary of Pilot Program for Enhancement of Employee Whistleblower Protection

IV. PILOT PROGRAM FOR WHISTLEBLOWER PROTECTION
In addition to this Ethics and Whistleblower Policy, Catholic Charities’ employees may be covered, if they work for a federally funded program, under the terms of the federal Pilot Program for Enhancement of Employee Whistleblower Protection ("Pilot Program") (41 U.S.C. 4712), a summary of which is attached as Exhibit C.

Policy Number: A-3
Area: General Agency Policy
Policy Title: Ethics and Whistleblower Policy
Effective Date: 07/01/2006
Latest Revision Approved: February 01, 2018
Recommended and Approved: [Signature]
Senior VP Human Resources/Legal Counsel

Approved: [Signature]
Administrator, President & CEO
ETHICS and WHISTLEBLOWER POLICY ACKNOWLEDGEMENT

By signing below, I acknowledge that I have read and understand Catholic Charities’ Ethics and Whistleblower Policy and agree to the following terms:

1. I have no direct or indirect interest in the assets, leases, business transactions or professional services of Catholic Charities except in the course of my employment.
2. I have not received preferential treatment in application for and receipt of agency services, or client referral fees.
3. I have not and will not conduct private practice or the business of secondary employment on agency premises.
4. I shall maintain only professional business relationships with the clients of the agency. I shall not borrow money from clients or lend money to clients, buy from or sell to clients any service or accept any product, service or money from a client.
5. All communication I have within Catholic Charities and outside agencies will be truthful.
6. I will not pursue any secondary employment outside of Catholic Charities that may be construed as competitive and/or posing a conflict of interest with my primary employment with Catholic Charities. I will review any questions related to the same with the Vice President of my Service Group or appropriate member of Senior Administration.
7. I will not divulge confidential client related or agency related information and will comply with the terms of Catholic Charities’ Confidentiality Agreement and all Agency policies related to confidentiality, including without limitation the Social Media Policy (A-15).
8. I will adhere to high ethical standards including without limitation standards set forth in the Catholic Charities Code of Ethics by avoiding conduct that discredits Catholic Charities, disrupts operations or coworkers, or is offensive to clients, board members and/or the community.
9. I will report any activity I believe is in violation of the law, ethical standards (including the standards set forth in the Catholic Charities Code of Ethics), or Catholic Charities policies. I understand that reports can be made without fear of retaliation. Please see Section II (A) for information regarding reporting. Reports should be made to my supervisor, another manager in my chain of command or the Senior VP of Program Development and Evaluation or the Whistleblower Hotline @ (877)767-7781 or by email to TellCatholicCharitiesChicago@GetInTouch.com.
10. I am expected to be familiar with the basic legal and ethical requirements relevant to my duties. I can learn these requirements through in-service training, supervisors, or reviewing program policies. I am expected to consult with my supervisors when I require assistance in understanding ethical or legal obligations.

_________________________  ____________________________
Employee (print name)         Supervisor (print name)

_________________________        Date          ____________________________
Employee signature              Date             Supervisor signature       Date

Circle Service Area:
Community Development and Outreach Services
Family and Parish Support Services
Child Youth and Family Services
Housing Services
Senior Services
Administration and Support Services
Area#:

Revised March 13, 2015
CONFIDENTIALITY AGREEMENT

As an employee, volunteer, consultant, intern/extern, authorized agent or independent contractor of Catholic Charities of the Archdiocese of Chicago ("Catholic Charities" or "Agency"), I am aware that I may come in contact with Confidential Information regarding clients and the work being done on their behalf as well as confidential information regarding the Agency. I am aware that improper disclosure of Confidential Information has a negative impact on the Agency’s ability to serve the best interests of the clients and may be a violation of certain laws and statutes. I am also aware that the need for confidentiality in these matters remains in force throughout and after my relationship with Catholic Charities.

THEREFORE, I AGREE AS FOLLOWS:

1. Definitions

   a. "Client Information" means all information obtained through or as a consequence of working with or for Catholic Charities as an employee, volunteer, intern/extern, consultant, authorized agent or independent contractor or having access to Catholic Charities’ premises concerning or relating to clients, specifically including but not limited to clients names, personal information and any other information disclosed by a client and/or contained in any records, documents or communications regarding client. All Client Information is confidential information.

   b. "Agency Information" means all information obtained through or as a consequence of working with or for Catholic Charities as an employee, volunteer, intern/extern, consultant, authorized agent or independent contractor or having access to Catholic Charities’ premises concerning or related to Catholic Charities, including without limitation any documents of Catholic Charities, contents of communications by, with or on behalf of Catholic Charities and information about organizational structures, donor names and gift details, personnel (current and former), business or marketing plans, research and development, financial data, factual research, statistical analyses, factual resources, information services or information retrieval systems. This includes any information described above which Catholic Charities treats as proprietary or designates as Agency Information, whether or not owned or developed by Catholic Charities. All Agency Information is confidential information.

   c. "Confidential Information" means any and all Client or Agency Information as herein defined and any other information deemed confidential by the Agency.

   d. "Documents, notes or tangible materials" and things "in any tangible form" as used in this Agreement includes, but is not limited to, writings, memoranda, documentation, records, photographs, video recordings, graphs, charts, maps, phone records, mailing lists, sketches, drawings, plans, papers, computer programs, software, notes, reference materials, diskettes, cds, tapes, slides, reports prepared by Catholic Charities or by third parties or records in any way incorporating of reflecting any Confidential Information.
Confidentiality Agreement  
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and any other data compilations from which information can be obtained or translated, if necessary, through detection devices into reasonable usable form whether originally created in writing, electronically or mechanically.

2. **Responsibilities of Employees, Volunteers, Consultants, Authorized Agents and Independent Contractors of the Catholic Charities:**

   a. While working for Catholic Charities or while having access to Agency Premises I agree that:

      i. I will not use any Confidential Information for any purpose other than to fulfill specific responsibilities determined by Catholic Charities;

      ii. I will not divulge or disseminate any Confidential Information to any person except as authorized by Catholic Charities and as necessary to fulfill specific responsibilities determined by Catholic Charities. I understand that it is essential to be particularly careful about discussing Confidential Information in any setting where non-Catholic Charities personnel may be present, especially in public space within any Catholic Charities' building (elevators, lobbies and reception areas); and

      iii. I will not remove, copy or reproduce in any tangible form, any documents, notes or other tangible materials relating to Confidential Information from Catholic Charities' client's, any Catholic Charities premises or any other premises at which the employee may have access to client or agency information except as authorized by Catholic Charities and as necessary to fulfill specific responsibilities determined by Catholic Charities.

         1. I also understand that Documents should not be left in conference rooms after a meeting has occurred;

         2. Documents that are lying on the desks of others should be considered Confidential Information; and

         3. I also understand that when documents containing Confidential Information are discarded, such documents must be destroyed.

      iv. I will inform my supervisor immediately if I become aware of any disclosure of Client or Agency information.

   b. After termination of employment relationship or other relationship with Catholic Charities I agree that:

      i. I will not use any Confidential Information for any purpose;
ii. I will not divulge or disseminate any Confidential Information to any person;

iii. I will return to Catholic Charities on the last day worked, all documents, notes or other tangible materials containing or relating to Confidential Information; and

iv. I will not retain, in any tangible form, any Confidential Information or copies of any documents containing Confidential Information and will certify that this Agreement has been adhered to.

3. **Enforcement.** The undersigned understands and agrees that Catholic Charities will suffer irreparable harm in the event that the undersigned fails to comply with any of his or her obligations under this Agreement. Accordingly, the undersigned agrees that Catholic Charities will, in addition to other remedies available to it under law, be entitled to specific performance to enforce this Agreement.

4. **Effects of Breach of Confidentiality Agreement.** The undersigned agrees that any breach of this Agreement shall be grounds for disciplinary action against employees, up to and including termination of employment, termination of contract, dismissal or termination of any other relationship the undersigned has with the Agency. The Agency may also bring a civil action against the undersigned for money damages, which shall be in addition to, and not exclusive of, any and all other rights and remedies the Agency may have against the undersigned. The Agency may also report any violation of this Agreement to any applicable professional and/or licensing boards or organizations.

5. **Governing Law.** Illinois law shall govern this Agreement.

6. **Survival.** This Agreement shall survive termination of the relationship under which it was entered into.

7. **Severability.** If any provision of this Agreement is found to be wholly or partially unenforceable for any reason, such provision or part thereof shall be deemed to be omitted from this Agreement without in any way invalidating or impairing the other provisions of this Agreement.

**BY SIGNING BELOW I CERTIFY THAT I HAVE READ AND UNDERSTAND THIS CONFIDENTIALITY AGREEMENT, AND THAT I UNDERSTAND THAT ANY VIOLATION OF THIS AGREEMENT SHALL BE GROUNDS FOR DISCIPLINARY ACTION AGAINST EMPLOYEES, UP TO AND INCLUDING TERMINATION OF EMPLOYMENT, TERMINATION OF CONTRACT, DISMISSAL OR TERMINATION OF ANY OTHER RELATIONSHIP THE UNDERSIGNED HAS WITH THE AGENCY AND THAT I MAY ALSO BE SUBJECT TO CIVIL AND/OR CRIMINAL PENALTIES AND DISCIPLINARY ACTION FROM ANY APPLICABLE PROFESSIONAL AND/OR LICENSING BOARDS OR ORGANIZATIONS FOR ANY BREACH OF THIS AGREEMENT.**
Revised: March 13, 2015
SUMMARY OF PILOT PROGRAM FOR ENHANCEMENT OF EMPLOYEE WHISTLEBLOWER PROTECTION
(41 U.S.C. 4712)

Introduction

Catholic Charities of the Archdiocese of Chicago is committed to providing a workplace that is free from all forms of discrimination and retaliation, and the Agency complies with all local, state and federal laws and regulations.

In addition to Catholic Charities’ Ethics and Whistleblower Policy (Policy A-3), Catholic Charities’ employees may be covered, if they work for a federally funded program, under the terms of the federal Pilot Program for Enhancement of Employee Whistleblower Protection (“Pilot Program”) (41 U.S.C. 4712), which remains in effect until January 1, 2017.

Provisions of the Pilot Program

Under the Pilot Program, employers may not discharge, demote, or otherwise discriminate against an employee as reprisal for disclosing information that the employee reasonably believes is evidence of the following:

1. Gross mismanagement of a Federal contract or grant;
2. Gross waste of Federal funds;
3. Abuse of authority relating to a Federal contract or grant (“abuse of authority” is defined as an “arbitrary and capricious exercise of authority that is inconsistent with the mission of the executive agency concerned or the successful performance of a [federal] contract or grant of such agency”);
4. A substantial and specific danger to public health or safety; or
5. A violation of law, rule or regulation related to a Federal contract (including competition for or negotiation of a contract) or grant.
The Pilot Program provides protection when an employee discloses the information noted above to one of the following:

1. A member of Congress or a representative of a committee of Congress;
2. An Inspector General;
3. The Government Accountability Office;

4. A Federal employee responsible for contract or grant oversight or management at the relevant Federal agency;
5. An authorized official of the Department of Justice or other law enforcement agency;
6. A court or grand jury; or
7. A management official or other employee of Catholic Charities who has the responsibility to investigate, discover, or address misconduct.

Additionally, an employee who initiates or provides evidence of misconduct in any judicial or administrative proceeding relating to waste, fraud, or abuse on a Federal contract or grant shall be deemed to have made a disclosure.

For additional information regarding this Pilot Program, please visit:


Complaints made under the Pilot Program

The Pilot Program provides a process for an employee to file a complaint if they believe that they have been subjected to a reprisal as a result of disclosing information (as discussed above). Employees making such complaints may submit them to the Inspector General of the Federal agency involved. A complaint must be submitted within three (3) years of the date of the alleged reprisal.

The Inspector General of the Federal agency involved will perform an investigation and submit a report to the Federal agency involved, which then determines whether a sufficient basis exists to conclude that discrimination occurred. If a determination is made that discrimination has occurred, the provisions of the Pilot Program set out the remedies that may be available. The institution has the right to appeal any order to the relevant United States court.
Notification of Employees

In accordance with the requirements of the Pilot Program, this Memorandum will be circulated electronically to all of our employees and will also be posted at Agency sites.

Catholic Charities’ Ethics and Whistleblower Policy (A-3)

Catholic Charities does not tolerate any form of retaliation against staff who, in good faith, make reports of non-compliance or government funding mismanagement. Employees should report any concerns regarding illegal/fraudulent activity and may do so anonymously by contacting the Catholic Charities Whistleblower Hotline (1-877-767-7781) or via email at TellCatholicCharities@GetInTouch.com.