

## DIOCESE OF PATERSON

### EthicsPoint

### Frequently Asked Questions

The Diocese of Paterson, like many other Archdioceses and Dioceses throughout the United States, is taking strong, proactive steps to foster accountability and lessen the risk of unethical behavior throughout our parishes, schools, agencies and other ministries whether it be financial misconduct, theft or other inappropriate behavior. To assist in this effort, we are establishing a confidential reporting system and a more efficient process for managing incidents brought forward by our employees, volunteers, parishioners, vendors and suppliers.

The following are some of the frequently asked questions about EthicsPoint.

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### **What is EthicsPoint?**

EthicsPoint is a comprehensive and confidential reporting tool to assist the Bishop, Pastors, Administrators, Principals, Agency Directors and employees/volunteers to work together to address fraud, abuse, and other misconduct in the Diocese, all while cultivating a positive parish and work environment consistent with the teachings of Jesus Christ.

### **Why do we need a system like EthicsPoint?**

☑ We believe that our parishioners, employees and volunteers are critical to our ability to fulfill the mission of Jesus Christ. By creating open channels of communication, we can promote positive parish and work environments and maximize our focus on that mission.

☑ Having a confidential reporting vehicle to address accounting and financial fraud and other inappropriate behaviors in a more effective and efficient manner will help our parishes, schools, agencies and other ministries mitigate financial, legal and reputational risks by reinforcing key policies and our commitment to the highest levels of ethical and Christ like behaviors.

☑ An effective reporting system will augment our other efforts to foster a culture of integrity and ethical decision-making consistent with our mission.

## **Reporting General**

### **May I report using either the Internet or the telephone?**

Yes. With EthicsPoint, you have the ability to file a confidential, anonymous report via either the telephone or the Internet.

### **What type of situations should I report?**

The EthicsPoint system is designed for employees to report any of the following types of issues:

- ☑ Accounting and Financial Misconduct
- ☑ Fraud and Theft
- ☑ Harassment, Intimidation, Bullying and other Inappropriate Behavior.

### **Why should I report what I know? What's in it for me?**

We all have the right to worship, work or volunteer in a positive environment and with that right comes the responsibility of acting in an ethical manner and letting the appropriate people know if someone is not acting appropriately. By working together, we can maintain a healthy and productive environment that is fully focused on our mission. The misconduct of even one person can threaten the reputation and viability of a parish, school, agency or the Diocese. 4 Diocese of Paterson EthicsPoint FAQs March 2013

**Should I report misconduct involving minors using EthicsPoint?**

No. The Diocese has a well-established process for handling those types of issues separate from EthicsPoint.

Issues related to misconduct with minors and/or sexual abuse of minors can be reported by calling the Diocesan Response Team: Monsignor T. Mark Condon, Vicar General (973) 777-8818 X 205 or the Chancellor's Office, (973) 777-8818, x248.

**If I see a violation, shouldn't I just report it to my pastor, supervisor, or Human Resources and let them deal with it?**

When you observe some behavior that you believe violates our code of conduct or other policy, we expect you to report it. If the behavior involves suspected accounting/financial misconduct, fraud or theft, we prefer that you report it using the EthicsPoint hotline. Ideally, for other inappropriate behaviors, you should bring any of those concerns forward to your pastor, your supervisor or other member of your local leadership team or to Human Resources. We recognize, however, that there may be circumstances when you are not comfortable reporting the issue in this manner. It is for these types of circumstances that we have partnered with EthicsPoint. We would rather you report anonymously than keep the information to yourself.

**Does the Diocese really want me to report?**

We certainly do. In fact, we *need* you to report. You know what is going on in your parish, school, agency or other ministry - both good and bad. You may have initial knowledge of an activity that may be cause for concern. Your reporting can minimize the potential negative impact on your parish, school agency or other ministry and the many faithful in the Diocese. Also, offering positive input may help identify issues that can improve our Catholic identity and our ability to fulfill our mission.

**Where do these reports go? Who can access them?**

Reports are entered directly on the EthicsPoint secure server to prevent any possible breach in security. EthicsPoint makes these reports available only to the Vicar General and specific individuals within the Diocese who are charged with evaluating the report, based on the type of violation and location of the incident. Each of these report recipients has had training in keeping these reports in the utmost confidence.

**Isn't this system just an example of someone watching over me?**

The EthicsPoint system concentrates on being a positive aspect of our overall philosophy, and allows us to assure a safe, secure, and ethical parish or workplace. You are encouraged to seek guidance on ethical dilemmas, provide positive suggestions, or communicate a concern. Effective communication is critical in your parish or workplace and this is a great tool to enhance that communication.

We have carefully chosen this reporting tool to help assure compliance with our policies and applicable laws while maintaining a positive environment for everyone to worship, work and volunteer. 5 Diocese of Paterson EthicsPoint FAQs March 2013

## Reporting, Security & Confidentiality

### Is “confidentiality” guaranteed if I use EthicsPoint?

All reports submitted through EthicsPoint will be handled promptly and discreetly. Individuals have the right to remain anonymous, and confidentiality will be maintained insofar as is possible. **However, no accusations will be pursued that are based exclusively on an anonymous source, i.e., the person making the allegations must provide, or indicate the existence of, supporting evidence.**

Reports of violations or suspected violations will be kept in confidence to the extent possible, consistent with the need to conduct an adequate investigation. The employee’s identity, if known, also may have to be disclosed in order to comply with the law and to provide accused individuals with their legal rights of defense.

All individuals involved in the handling/investigation of hotline reports are made aware of our policy about the appropriate handling of confidential information and understand that violating that policy will not be tolerated.

### **It is my understanding that any report I send from a parish or workplace computer generates a server log that shows every web-site that my PC connects with, and won’t this log identify me as a report originator?**

EthicsPoint does not generate or maintain any internal connection logs with IP addresses, so no information linking your PC to EthicsPoint is available. In fact, EthicsPoint is contractually committed not to pursue a reporter’s identity.

If you feel uncomfortable making a report on your parish or work PC, you have the option of using a PC elsewhere (such as one located in your home, at an Internet café, at a friend’s house, etc.) through the EthicsPoint secure website. Many people choose this option, as EthicsPoint’s data shows that fewer than 12% of reports generated during working hours.

### **Can I file a report from home and still remain anonymous?**

A report from home, a neighbor’s computer, or any Internet portal will remain secure and anonymous. An Internet portal never identifies a visitor by screen name and the EthicsPoint system strips away Internet addresses so that anonymity is totally maintained. Plus, EthicsPoint is contractually committed not to pursue a reporter’s identity.

### **I am concerned that the information I provide EthicsPoint will ultimately reveal my identity. How can you assure me that will not happen?**

The EthicsPoint system is designed to protect your anonymity. However, if you wish to remain anonymous, you - as a reporting party - need to ensure that the body of the report does not reveal your identity by accident. For example, if you say something like “From my cube next to Jan Smith...” or “In my 33 years...” you may inadvertently disclose your identity. 6 Diocese of Paterson EthicsPoint FAQs March 2013

**Is the telephone toll-free hot line confidential and anonymous too?**

Yes. You will be asked to provide the same information that you would provide in an Internet-based report and an interviewer will type your responses into the EthicsPoint Web site. These reports have the same security and confidentiality measures applied to them during delivery.

**What if I remember something important about the incident after I file the report? Or what if the Diocese has further questions for me concerning my report?**

When you file a report at the EthicsPoint Web site or through the EthicsPoint Call Center, you receive a unique user name and are asked to choose a password. You can return to the EthicsPoint system again either by Internet or telephone and access the original report to add more detail. You will also be able to answer questions posed by a Diocesan representative and add further information that will help resolve open issues. We strongly suggest that you return to the site in the time specified to answer any additional questions. You and the Diocese now have entered into an “anonymous dialogue” where situations are not only identified but can be resolved, no matter how complex.

**What if I want to be identified with my report?**

There is a section in the report for identifying yourself, if you wish.

**I am concerned that if my pastor or supervisor finds out that I filed a complaint, I'll lose my job or no longer be able to volunteer. How can you assure me that this will not happen?**

No individual who in good faith reports a violation or suspected violation, or participates in the investigation of any alleged violation, will be subject to harassment or retaliation by the Diocese, its parishes, schools, agencies or other affiliated institutions or any of its employees or agents, nor will they suffer adverse employment/volunteer service consequences relating to their complaint or participation in an investigation.

Anyone who retaliates against an individual who has reported a violation or suspected violation in good faith, or against an individual who participates in the investigation of an alleged violation, shall be subject to appropriate disciplinary action in accordance with Diocesan policy or Canon Law. This “no retaliation” policy is intended to encourage and enable individuals to raise serious concerns within the Diocese prior to seeking outside resolution.

Any individual who believes they have been retaliated against for filing a report through EthicsPoint should immediately report their concern to William Rafferty, Executive Director or the Office of the Chancellor of the Diocese. 7 Diocese of Paterson EthicsPoint FAQs March 2013

## Tips and Best Practices

### **I am aware of some individuals involved with unethical conduct, but it doesn't affect me. Why should I bother reporting it?**

Our Diocese chooses to promote ethical behavior. All unethical conduct, at any level, ultimately hurts everyone in the Diocese, including you. You only have to consider what happened in recent Church and corporate scandals to see the disastrous effects that a seemingly harmless lapse in ethics can have on an otherwise healthy church or other organization. So if you know of any incidents of misconduct or ethical violations, consider it your duty to yourself and your fellow parishioners, volunteers or coworkers to report it.

### **I am not sure if what I have observed or heard is a violation of our code of conduct or other policy, or involves unethical conduct, but it just does not look right to me. What should I do?**

File a report. EthicsPoint can help you prepare and file your report so it can be properly understood. We'd rather you report a situation that turns out to be harmless than let possible unethical behavior go unchecked because you weren't sure.

### **What if my pastor or other supervisors are involved in a violation? Won't they get the report and start a cover-up?**

The EthicsPoint system and report distribution are designed so that implicated parties are not notified or granted access to reports in which they have been named.

### **Are these follow-ups on reports as secure as the first one?**

All EthicsPoint correspondences are held in the same strict confidence as the initial report, continuing under the umbrella of anonymity.

### **Can I still file a report if I don't have access to the Internet?**

You can file an EthicsPoint report from any computer that can access the Internet. You can file from home. Many public locations, including the public library, have Internet computers. If you don't have access or are uncomfortable using a computer, you can call the EthicsPoint toll-free hotline 855-247-3140 which is available 24 hours a day, 365 days a year.

## **How to File a Report**

The Diocese of Paterson, like many other Archdioceses and Dioceses throughout the United States, is taking strong, proactive steps to foster accountability and lessen the risk of unethical behavior throughout our parishes, schools, agencies and other ministries whether it be financial misconduct, theft or other inappropriate behavior. To assist in this effort, we are establishing a confidential reporting system and a more efficient process for managing incidents brought forward by our employees, volunteers, parishioners, vendors and suppliers. 8 Diocese of Paterson EthicsPoint FAQs March 2013

## **What is the EthicsPoint Reporting System?**

EthicsPoint is committed to defining best practices for integrated Governance, Risk, and Compliance (GRC). Serving over 2,000 active clients, including more than 30 Dioceses and Archdioceses in the United States, and over eleven million stakeholders worldwide, EthicsPoint has created an effective reporting system that is instrumental in managing enterprise and diocesan risk. The EthicsPoint Reporting System provides individuals at all levels in an organization with the appropriate tools and information for reporting, investigating, and resolving issues in a timely, cost-efficient manner.

## **What should I report?**

Situations, events or actions by individuals or groups that you believe carry a negative impact on parish, agency or diocesan well-being or are detrimental to morale, productivity, or personal safety are all categories of things that should be reported.

The EthicsPoint hotline has been set up to receive reports of accounting and financial misconduct, fraud, theft, harassment, intimidation and other inappropriate behavior.

Please remember, however, that frivolous or unfounded reports do not help foster a positive workplace and can lead to disciplinary action including termination of employment or volunteer service.

If you are uncertain if a situation violates parish/agency or diocesan policy, is illegal or constitutes harassment or discrimination, use EthicsPoint to obtain clarification. We would much rather have you ask than let potential problems go unchecked. However, EthicsPoint should not be used for immediate threats to life or property. These types of reports should be directed to 911.

## **How do I file a report?**

EthicsPoint is designed to maintain your confidentiality and anonymity. The following step-by-step instructions will guide you through the processes available to submit a report:

### **Step 1: Access EthicsPoint to file a report:**

Use any one of these three convenient channels of communication:

#### **Diocesan Website**

Click on link provided on the Diocesan Website

**www.patersondiocese.org. You will automatically be connected to the Diocese of Paterson's secure EthicsPoint landing page and then "Select an Issue Type".**

#### **Public Internet**

From any computer having Internet access (home, public library, neighbor, etc.), go to [www.ethicspoint.com](http://www.ethicspoint.com) and click on "File a new Report"



**Toll-Free Phone**

Call your EthicsPoint toll-free hotline at 1-855-247-3140. An intake specialist will assist you with entering your report into the EthicsPoint system.