

Whistleblower Protection Policy

Introduction

The Episcopal Diocese of San Diego requires directors, officers, employees, and volunteers of our diocese and congregations to observe high standards of business and personal ethics in the conduct of their duties and responsibilities. As employees and representatives of EDSD, we must practice honesty and integrity in fulfilling our responsibilities, comply with all applicable laws and regulations, and model Christian ethics in behavior.

This Whistleblower Policy applies to the Episcopal Diocese of San Diego and all mission congregations therein. Parishes are encouraged to adopt this policy, and to report concerns to the diocesan compliance officer and appropriate corrective action will be recommended to the parish. “Governing board” as referenced below includes diocesan governance committees as well as congregational Vestries and Bishop’s Committees.

Reporting Responsibility

This Whistleblower Policy is intended to encourage and enable employees and others to raise serious concerns internally so that the Diocese can address and correct inappropriate conduct and actions. It is the responsibility of all board members, officers, employees and volunteers to report concerns about violations of the Church’s code of ethics or suspected violations of law or regulations that govern the Church’s operations.

No Retaliation

It is contrary to the values of EDSD for anyone to retaliate against any governing board member, officer, employee or volunteer who in good faith reports an ethics violation or suspected ethics violation or other improper or illegal conduct, including but not limited to:

- Violation of law, such as a complaint of discrimination, suspected fraud, or suspected violation of any regulation governing the operations of EDSD
- Acts inconsistent with the Constitution or Canons or the Church
- Acts inconsistent with Church policy
- Title IV violations
- Theft, misuse, or misappropriation of church assets
- Misstatements or irregularities in ministry or financial records and reporting
- Forgery or alteration of documents
- Any other form of fraud
- Abusive behavior

An employee or governing board member who retaliates against someone who has reported a violation in good faith is subject to discipline up to and including termination of employment or removal from office, if eligible.

Reporting Procedure



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☎ 619.291.5947
✉ info@edsd.org
🌐 www.edsd.org
🏠 2083 Sunset Cliffs Blvd.
San Diego CA 92106

EDSD has an open-door policy and suggests that employees share their questions, concerns, suggestions, or complaints with their supervisor. If an individual is not comfortable speaking with their supervisor or is not satisfied with the supervisor's response, the individual is encouraged to speak with the diocesan compliance officer listed in this policy. Supervisors and managers employed by the Diocese or any mission are required to report complaints or concerns about suspected ethical and legal violations in writing to EDSD's Compliance Officer, who has the responsibility to investigate all reported complaints. Employees with concerns or complaints may also submit their concerns in writing directly to their supervisor or to EDSD's Compliance Officer. Governing board members and volunteers are also encouraged to report complaints to EDSD's Compliance Officer.

Compliance Officer

EDSD's Compliance Officer is responsible for ensuring that all complaints about unethical or illegal conduct are investigated and resolved. The Compliance Officer will advise the Bishop of all complaints and their resolution and will report at least annually to the Chair of the Finance Committee on compliance activity relating to accounting or alleged financial improprieties. The Compliance Officer will report to each congregation's Finance or Audit Chair on compliance activity relating to that congregation's accounting or alleged financial improprieties.

Accounting and Auditing Matters

EDSD's Compliance Officer shall immediately notify any applicable Audit Committee or Finance Committee for a congregation of any concerns or complaint regarding accounting practices, internal controls or auditing and work with the committee until the matter is resolved.

Acting in Good Faith

Anyone filing a written complaint concerning a violation or suspected violation must be acting in good faith and have reasonable grounds for believing the information disclosed indicates a violation. Any allegations that prove not to be substantiated and which prove to have been made maliciously or knowingly to be false will be viewed as a serious disciplinary offense.

Confidentiality

Violations or suspected violations may be submitted on a confidential basis by the complainant. Reports of violations or suspected violations will be kept confidential to the extent possible, consistent with the need to conduct an adequate investigation.

Handling of Reported Violations

EDSD's Compliance Officer will notify the person who submitted a complaint and acknowledge receipt of the reported violation or suspected violation. All reports relating to Diocesan or mission employees or volunteers will be promptly investigated, and appropriate corrective action will be taken if warranted by the investigation; reports to the Compliance Officer relating to parishes will be forwarded for appropriate action by the parish.

Compliance Officer:
The Rev. Jeff Martinhauk
Chief Financial Officer
619-481-5453



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- 📞 619.291.5947
- ✉️ info@edsd.org
- 🌐 www.edsd.org
- 🏠 2083 Sunset Cliffs Blvd.
San Diego CA 92106

jmartinhauk@edsd.org

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