

## **Diocese of San Diego**

### **FRAUD POLICY**

#### **POLICY STATEMENT**

The Roman Catholic Diocese of San Diego promotes a culture of honest and accountable stewardship of God's gifts in which fraud is not tolerated. The prevention of fraud is the responsibility of all clergy, religious, lay employees, Parish Finance Council members, volunteers, and parishioners. The diocese expects those parties to report any suspected case of fraud and will not tolerate retaliation against those reporting suspected fraud. At the same time, it should be noted that any calumny or intentional false allegation of fraud is a serious civil and canonical offense.

Persons found to have participated in fraudulent acts will be subject to disciplinary action, up to and including termination and civil and criminal prosecution.

#### **WHAT IS FRAUD? — DEFINITIONS**

- A. Fraud is a deliberate and/or unlawful deception, misrepresentation, or concealment of facts committed to secure unauthorized personal advantage, benefit, or gain and to cause loss to another.
- B. Prohibited acts include, but are not limited to:
  - 1. Theft of any assets (money, tangible property, etc.)
  - 2. Authorizing or receiving compensation for goods not received, services not performed, or hours not worked
  - 3. Bribery, kickbacks, or rebates (given or received)
  - 4. Alteration or falsification of documents
  - 5. Inappropriate use of computer systems
  - 6. Misappropriation, misapplication, destruction, removal, or concealment of Church money, property, or other assets
  - 7. Embezzlement (any loss resulting from the misappropriation of assets)
  - 8. Intentional misrepresentation or distortion of facts, financial records, or financial statements
  - 9. Improper use of church paid staff involving non-church property or assets

#### **FRAUD REPORTING PROCEDURE**

- A. Suspected fraud should be reported as soon as possible. Failure to promptly report suspected fraud claims may jeopardize the diocese's ability to recover stolen funds and/or property.
- B. The diocesan website includes a fraud hotline number and a [Report of Suspected Fraud](#) form.

- C. The diocesan fraud hotline has a recorded message that instructs the caller where to get a form or to leave contact information to request a form.
- D. The reports are forwarded to the Finance Officer, either via the website, fax, or U.S. Mail.
- E. Reports must include the name and contact information of the person submitting the form. Anonymous reports are not investigated.
- F. Designated staff in the Finance Office thoroughly and expeditiously investigates any reported cases of suspected fraud. The person submitting the report receives a confirmation indicating that the report was received, thanking them, and specifying that all subsequent investigation is confidential. That person may or may not be contacted during the investigation.