

**WATER AUTHORITY OF GREAT NECK NORTH**  
**WHISTLEBLOWING POLICY**

As Re-Adopted February 3, 2025

This policy is being enacted pursuant to the Public Authorities Accountability Act of 2005.

In addition to the public, it covers Authority officers who may want to report information concerning acts of wrongdoing, misconduct, malfeasance or other inappropriate behavior by an officer or employee of the Authority.

**Procedure for the Public**

Members of the public who suspect an Authority employee or members of the public or contractors, in their business dealings with the Authority, of fraud or corruption, should contact the Superintendent at 516-487-7975 ext 12.

If your suspicion is about the Superintendent, you should contact the Authority's Treasurer at 516-487-7975 ext 11.

If your suspicion is about the Superintendent and the Treasurer then you should contact either the Chairperson or General Counsel. They can be reached by leaving a message with the operator at the Authority office at 516-487-7975.

All allegations are treated as confidential and will be thoroughly investigated and reported appropriately.

**Procedure for Employees**

**Aims and Scope of this Policy**

This policy aims to:

- encourage you to feel confident in raising serious concerns and to question and act upon concerns about practice and procedures
- provide avenues for you to raise those concerns and receive feedback on any action taken
- ensure that you receive a response to your concerns and that you are aware of how to pursue them if you are not satisfied
- reassure you that you will be protected from possible reprisals or victimization if you have a reasonable belief that you have made any disclosure in good faith.

There are existing procedures in place to enable you to lodge a grievance relating to your own employment. The Whistleblowing policy is intended to cover major concerns that fall outside the scope of other procedures. These include:

- conduct which is an offense or a breach of law
- disclosures related to miscarriages of justice
- health and safety risks, including risks to the public as well as other employees
- damages to the environment
- the unauthorized use of public funds
- possible fraud and corruption
- sexual or physical abuse of customers, or
- other unethical conduct.

Thus, any serious concerns that you have about any aspect of service provision or the conduct of officers or employees of the Authority or others acting on behalf of the Authority can be reported under this Policy. This may be about something that:

- makes you feel uncomfortable in terms of known standards, your experience or the standards you believe the Authority subscribe to; or
- is against the Authority's Standing Orders and policies; or
- falls below established standards of practice; or
- amounts to improper conduct.

### **Harassment or Victimization**

The Authority is committed to good practice and high standards and wants to be supportive of employees as set out in its policies and procedures.

The Authority recognizes that the decision to report a concern can be a difficult one to make. If you believe that what you are saying is true, you should have nothing to fear because you will be doing your duty to your employer and those for whom you are providing a service.

The Authority will not tolerate any harassment or victimization (including informal pressures) and will take appropriate action to protect you when you raise a concern in good faith.

Any investigation into allegations of potential malfeasance will not influence or be influenced by any disciplinary or competency procedures that already affect you.

### **Confidentiality**

All concerns will be treated in confidence and every effort will be made not to reveal your identity if you so wish. At the appropriate time, however, you may need to come forward as a witness.

### **Anonymous Allegations**

This policy encourages you to put your name to your allegation whenever possible. Concerns expressed anonymously are much less powerful but will be considered at the discretion of the Authority.

In exercising this discretion the factors to be taken into account would include:

- the seriousness of the issues raised;
- the credibility of the concern; and
- the likelihood of confirming the allegation from attributable sources.

### **Allegations made in good faith**

If you make an allegation in good faith, which is or is not confirmed by the investigation, no action will be taken against you.

### **Malicious Allegations**

If you make an allegation maliciously or for personal gain, disciplinary action may be taken against you.

## **How to Raise a Concern**

As a first step, you should normally raise concerns with your immediate supervisor, or go to a supervisor in whom you have confidence. With whom you raise the concern will obviously depend on the seriousness and sensitivity of the issues involved and who is suspected of the malfeasance.

Concerns may be raised verbally or in writing. Staff who wish to make a written report are invited to use the following format:

- the background and history of the concern (giving relevant dates);
- the reason why you are particularly concerned about the situation, if any.

The earlier you express the concern, the easier it is to take action.

Although you are not expected to prove beyond doubt the truth of an allegation, you will need to demonstrate to the person contacted that there are reasonable grounds for your concern.

Advice and guidance on how matters of concern may be pursued can be obtained from:

- Superintendent 516-487-7975 ext 12
- Assistant Superintendent 516-487-7975 ext 30
- Treasurer 516 487-7975 ext 11

You may wish to consider discussing your concern with a colleague first and you may find it easier to raise the matter if there are two (or more) of you who have had the same experience or concerns.

You may invite another employee of the Authority or another appropriate person to be present during any meetings or interviews in connection with the concerns you have raised.

## **The Responsible Officer**

The Superintendent has overall responsibility for the maintenance and operation of this policy. The Superintendent maintains a record of concerns raised and the outcomes (but in a form which does not endanger your confidentiality) and will report as necessary to the Board of Directors of the Authority.

In the event that the Superintendent is the subject of the concern, the Chairperson, or his or her designee, shall fulfill the responsibilities of the Superintendent pursuant to this Policy.

## **How the Authority will respond**

The Authority will respond to your concerns. Do not forget that testing out your concerns is not the same as either accepting or rejecting them. Where appropriate, the matters raised may:

- be investigated by management, internal audit, or through the disciplinary process
- be referred to the police
- be referred to an external auditor
- form the subject of an independent inquiry.

In order to protect individuals and those accused of possible malfeasance or other wrong doing, initial inquiries will be made to decide whether an investigation is appropriate and, if so, what form it should take. The overriding principle that the Authority will have in mind is the public interest. Concerns or allegations which fall within the scope of specific procedures (for example, discrimination issues) will normally be referred for

consideration under those procedures.

Some concerns may be resolved by agreed upon action without the need for investigation. If urgent action is required, it will be taken before any investigation is conducted.

A supervisor must notify the Superintendent as soon as he or she is aware of a concern. The Superintendent will immediately notify the Chairperson of the Authority and within ten working days of a concern being raised with him/her, the Superintendent will write to you:

- acknowledging that the concern has been received
- indicating how we propose to deal with the matter
- giving an estimate of how long it will take to provide a final response
- telling you whether any initial enquiries have been made and
- supplying you with information on relevant staff support mechanisms, if any.

The amount of contact between the officers considering the issues and you will depend on the nature of the matters raised, the potential difficulties involved, and the clarity of the information provided. If necessary, the Authority will seek further information from you.

When any meeting or interview is arranged (off-site if you so wish) in connection with the concerns you have raised, you can be accompanied by another employee of the Authority or another appropriate person.

The Authority will take steps to minimize any difficulties which you may experience as a result of raising a concern. For instance, if you are required to give evidence in criminal or disciplinary proceedings, the Authority will arrange for you to receive advice about the procedure.

The Authority accepts that you need to be assured that the matter has been properly addressed. Thus, subject to legal constraints, we will inform you of the outcomes of any investigation.

### **How the matter can be taken further**

This policy is intended to provide you with an avenue within the Authority to raise concerns. The Authority hopes you will be satisfied with any action taken. If you are not, and if you feel it is right to take the matter outside the Authority, the following are possible contact points:

- relevant professional bodies or regulatory organizations
- a relevant voluntary organization
- the Authority's auditor
- the police.

If you do take the matter outside the Authority, you should ensure that you do not disclose confidential information.

### **Review**

This policy is to be reviewed as appropriate. However, in any event, it will be reviewed no less frequently than may be required by law, taking into account any change of legislation or Authority policy, to ensure it remains relevant and effective.

## **ACTION TAKEN**

**Person has a concern and needs to know how it should be raised.**

### **Discuss with either:**

Any supervisor in whom he/she has confidence

A colleague

The Superintendent

After discussion, there may be no need to take further action.

If there is a need to investigate further then it would be preferable if the concern could be put in writing and given to the Superintendent

NOTE — Anonymous allegations/concerns will be considered but they are less powerful and will only be investigated if sufficient evidence is provided.

### **Superintendent**

Notes concerns and notifies Chairperson

### **Chairperson**

Agrees upon action with Superintendent and, if sensible, the Supervisor concerned.

### **Letter to Person raising the concern**

Acknowledges receipt of the contact and indicates how the case is to be dealt with and the estimated timeframe.

### **Completion of inquiry**

Superintendent notifies the person raising the concern of the outcome.