



Ethics Office Monthly Report

MWD

METROPOLITAN WATER DISTRICT OF SOUTHERN CALIFORNIA

April 2019

COMPLIANCE

Communicated with the Board of Directors and over 650 employees for compliance with the Annual Form 700 filings. Compliance to date is nearly 100 percent for directors and 90 percent for employees.

Provided substantive and technical assistance to Board members and employees filing Assuming, Leaving Office, and Annual Form 700s.

Monitored the status of Assuming Office and Leaving Office filings and sent notifications to filers to increase compliance.

ADVISORY SERVICES

Responded to requests for advice involving financial disclosure, conflicts of interest, acceptance of tickets to a non-profit event, gifts from vendors, and outside employment.

Created monthly conflicts bulletin for directors in collaboration with the General Counsel.

Participated in meetings and document preparation with the General Counsel and outside counsel on proposed changes to Metropolitan's ethics policies and procedures, including the following:

- Administrative Code amendments
- Operating Policy amendments
- Draft Board letters on Ethics Office Review workshops

EDUCATION AND TRAINING

Presented an Ethics Office overview at two new employee orientation sessions.

INVESTIGATIONS

The Ethics Office receives complaints from both internal and external sources. Staff conducts an initial review of each complaint to determine if the implicated policies fall within the area of responsibility of the Ethics Office, Employee Relations, or both.

At its regularly scheduled bi-weekly meetings with Employee Relations staff in April, Ethics staff discussed inter-office referrals and other ongoing complaints implicating policies that potentially overlap with Employee Relations. For overlapping matters, staff discussed historic information on investigation subjects and best practice approaches for resolving pending matters.

In April, staff processed five complaints as follows:

1. Whistleblower complaint alleging supervisor is giving special treatment to a subordinate employee who is also a relative. This matter is currently under review.
2. Whistleblower complaint alleging an employee had a financial conflict of interest in a recent Metropolitan matter. This matter is currently under review.
3. Whistleblower complaint alleging a

manager released confidential information about a subordinate employee. This matter was referred to the Human Resources Department.

4. Whistleblower complaint alleging a supervisor took actions to prevent employees from reporting potential workplace violations. This matter is currently under review.
5. Whistleblower complaint alleging a supervisor retaliated against an employee for reporting potential workplace violations. This matter is currently under review.

After initial reviews, staff also closed two complaints in April that were received at the end of March:

1. Whistleblower complaint alleging supervisor retaliated against a subordinate in relation to a workplace dispute. This matter was referred to the Human Resources Department.
2. Whistleblower complaint alleging a manager abused their authority for personal gain. This matter was closed because the anonymous complainant did not provide sufficient information on which to begin an investigation.