

Action Plan for Managing an Internal Investigation

Control # _____ Prepared by: _____ Date: _____

Source: (Help Line, Report to Mgmt., Other) _____

1. List all the allegations of misconduct or concerns reported.
2. Segregate facts from opinions, feelings and hearsay.
3. Determine if an investigation will be necessary.
4. Identify who will manage the investigation. (Ethics & Compliance, Human Resources, Internal Audit, In-house Legal, or outside professional support).
5. Identify who will conduct the investigation. (E&C, HR, Internal Audit, Legal, External Source)
6. Identify who may be required to support the investigation (Finance, IT, HR, Mgmt., etc.)
7. Identify any documentation needed to support the investigation (Policies & Procedures, work instructions, business records, security video, gate logs, communications, previous allegations or concerns, etc.)
8. Identify the individuals to be interviewed (consider order in which you plan to interview).
9. Prepare standard questions in advance of the interviews.
 - Develop open ended question that will allow interviewees to expand on the information in their own words.
10. Schedule interviews in a location that offers privacy and confidentiality.
11. Explain to interviewee the purpose of the interview, need for confidentiality, any related company policy, and if necessary, attorney-client privilege.
12. Include names of investigator(s), interviewee, date, time on investigation record.

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13. Keep notes clear, concise and objective (to the extent practical, document exactly what the interviewee states).
14. Identify and obtain additional documentation or the names of others who could corroborate the information obtained from the interviewee.
15. Document observed behaviors, body language, lack of cooperation, nervousness, fear, etc. Note how clearly the interviewee recalled events or behaviors along with any biases in the interviewee comments.
16. Review all documents and interview notes to your investigation plan
17. Prepare report based on facts and supporting documentation.
18. If possible, obtain objective and independent review from an E&C colleague.
19. Issue report to Management based on "need to know".
20. Follow-up with Human Resources to assure corrective or disciplinary actions were taken, if applicable.
21. Determine with Legal if external reporting (mandatory or voluntary) to customer of Government Agencies will be made.
22. Maintain investigation file in accordance with your company's record retention policy. (2-4 Years recommended for routine Helpline Matters, 5-7 years for reports in response to allegations of fraud.)
23. Summarize investigations at a high level for periodic reports to Management.
24. Follow up with reporter, if possible, to close the loop.

Note: You do not need to provide any details of the investigation or corrective actions. A brief call or note to the reporter stating that the matter was investigated and the appropriate corrective actions were taken will suffice.