

# ***Internal Investigations: Process and Guidelines***

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# Overview of Presentation

- Objectives
- Reporting Mechanisms
- Assignment of Priorities & Personnel
- Investigation Interviews
- Investigation Analysis
- Decision, Reports, Action
- Participation
- Discussion



# Objectives

- Full Compliance with Laws, Rules and Policies
  - Ensure all allegations/issues are monitored and managed
  - These are processing guidelines
  - The Civil Rights Model is the basis for these guidelines
- Integrity and Trust
  - Investigations are confidential (complaint is not shared)
  - Confidence that there is Zero Tolerance for retaliation:
    - Personnel
    - Students
    - Vendors

**Objective is to be Proactive  
about RU culture and Integrity**



# **REPORTING MECHANISMS**



**All three methods monitored through Global Hotline Systems**

# Assignment of Priorities & Personnel

- Who gets the assignment
  - Medical Compliance
  - Title IX
  - Discrimination and Workplace
  - Labor/Union
  - Student Judicial
  - Conflicts
  - External resources
- Speed/priority
- Deadlines for completion

# Investigation Interviews

## Steps

- Confidential Interview with complainant
  - Investigation Process included with invite
- Confidential Interviews with witnesses and respondent(s)
  - Order determined by the investigator
- Provide Complainant and Respondents with a copy of applicable policy
- Review with Interviewee:
  - ✓ Confidentiality Statement
  - ✓ Investigator's Role
  - ✓ Ground Rules
  - ✓ Allegations
  - ✓ Expectations
- Gather and Record:
  - ✓ Facts
  - ✓ Other sources of information
  - ✓ Witnessed Behaviors



# Investigation Analysis

- Review Information Gathered
- Follow-up interview(s) of Complainant and/or Respondent
- Review & Analyze Law/Rule/Policy
- Violation Determination
  - Substantiated
  - Unsubstantiated
  - Inconclusive



# Communication, Reports, Actions

Communication	Reports-Actions
Respondent notified of determination of investigation	Corrective Action Plan (CAP) may be required
Complainant notified of result, in brief	Discipline-referred to Labor Relations
Supervisor(s) advised/notified as necessary	Legal Enforcement for Substantiated Criminal Behavior
Formal personnel file copied as appropriate	Audit Committee advised by type of claim
Labor relations and Legal counsel notified as appropriate	Community reports issued every term

# PARTICIPATION



- ✓ Employees obligated to report
- ✓ Full Cooperation Expected
- ✓ Protection from Reprisal/Retaliation
  - Retaliation/Whistleblower Protections
- ✓ Corrective Action Plan (CAP) or discipline

**RU = Zero Tolerance (means we take complaints seriously and will look into them)**

