



STEPS FOR UNDERTAKING AN INVESTIGATION OF PRESIDENT/CEO

Instigation

Allegation examples -harassment, retaliation, bullying, financial

Internal Information Gathering & Analysis

Meet parties, review allegations, alert Attorneys & Insurance

Investigation Threshold & Evaluation

Review Investigation Results, choose a course of action

Situation Management

Implement course of action, consider a Workplace Investigation

Situation Evaluation

Review results, continue on or hire a Workplace Investigator

Investigation

Begin formal investigation, funding, Clarify tasks/actions, alerts

Processing Investigation Results

Collect results, share with Exec Comm, Board, parties, staff

Closing the Investigation

Confirm next steps, agreements, constraint removals, alerts

MANAGING DURING AN INVESTIGATION

Board Chair Role

- Determine Scope of Awareness Regarding Accusation Issues
- Establish Confidentiality Standards
- Modify CEO Duties During Investigation
- Board Communication
- Investigator Communication
- Direct Communication with Appropriate Staff (Accuser, CEO, HR Director, Witnesses)

President & CEO Role

- Adhere to Modified Duties
- Participate in Investigation Interview
- Provide Supporting Materials or Documents
- Uphold Confidentiality

HR Director Role

- Provide Policies and Documents
- Reserve Interview Location
- Schedule Witness Interviews with Investigator
- Uphold Confidentiality and Support Staff With Confidentiality



POLICIES AND DOCUMENTS TO ANNUALLY CONFIRM ARE IN PLACE

Workplace Investigations – Policy Review

- Employee Handbook
- Job Descriptions
- Confirmation of At-Will Employment - AR*
- Harassment, Discrimination, Retaliation Prevention Policy - AR*
- Harassment, Discrimination, Retaliation Training - AR*
- Whistle Blower Policy
- Succession Plan

*AR = Acknowledgement Receipt

Workplace Investigations – Document Review

- Performance Reviews – Assessments
- Performance Reviews – Self-Assessments
- Performance Reviews – Rebuttals
- Assessment Logs
- Emails

Financial Investigations – Policies and Documents

- Authorized Signer Policy
- Conflict of Interest Policy
- Financial Controls Policy and Practice
- Document Retention Policy
- Electronic Accounting Files
- Check Requests and Hard Copy Financials
- Bank Deposit and Electronic Transfer Records
- Personnel Wage and Benefit Letters
- Employee Handbook