

10 steps: Conducting an internal investigation

Follow these procedures when conducting internal investigations of alleged employee misconduct:

1. **Decide whether a formal investigation is necessary.** Some problems can be resolved without a full-scale investigation. Consider whether you need more facts than the employee can provide.
2. **Determine what issues are at stake.** Since different complaints are handled differently, you must understand the issue before initiating the investigation.
3. **Select the appropriate investigator.** Choose between a front-line supervisor or manager, a representative from HR, or an outside agency.
4. **Identify relevant documentation to be reviewed.** Before conducting interviews, make sure you understand what company policies apply to the situation. Also consider what relevant documentation, e.g., personnel files, expense reports, performance appraisals, prior investigation files, etc., will frame the scope of the investigation.
5. **Consider whether interim actions are necessary** to protect the safety and health of others or to protect the integrity of company policies. For instance, claims of violence or theft may require you to transfer or suspend the accused employee pending the outcome of the investigation.
6. **Notify the accused employee** of the accusations against him/her and give the employee an opportunity to tell his/her side of the story.
7. **Interview potential witnesses.** Start by drafting a preliminary list of questions for each witness and be prepared to go beyond your pre-planned questions as the conversation unfolds. The goal of the interview is to obtain as much information as possible from each witness.
8. **Determine the seriousness of the violation,** if your investigation has convinced you that one occurred. Identify what laws or company policies have been broken, prepare a summary of your findings and recommend a course of action.
9. **Inform both** the accused employee and the employee who complained of your final decision.
10. **Document** every step of the investigatory process, since proper documentation may help you avoid liability in the future.