

Headed in the Right Direction

Ethics and Compliance Investigations: “Dos and Don’ts” for Managers

It’s one of the parts of your job you like the least: you receive a complaint about a team member, and an internal investigation is underway.

As a manager, your participation in workplace investigations is critical in creating optimal outcomes. You also have the very important role of maintaining confidentiality and coaching all of the team members who may be involved to “Do the right things right,” both during and after the investigation.

Here are some “**Dos and Don’ts**” to keep in mind:

- **Do:** Be open and honest with investigators. Now is not the time to shade the facts to steer the outcome of the investigation. We need to know what actually happened, good or bad.
- **Don’t:** Discuss details of the investigation with other members of your team. If other team members become aware of an investigation, be prepared with a good response: *“For a variety of important reasons, details of the investigation are confidential, and that means I can’t discuss this issue with you. I hope you understand.”*
- **Do:** Ask questions about the role (if any) you are expected to play in the investigation – the Compliance, HR, Internal Audit and Legal teams want to be a resource to you.
- **Don’t:** Take any steps to investigate the issue yourself unless the steps have been approved. Often, actions that seem like they would be helpful (questioning a

- member of the team or going through emails or files) can compromise an investigation.
- **Do:** Be objective. Stay neutral during an investigation: the outcome may surprise you.
 - **Don't:** Retaliate. It can be difficult to keep personal feelings out of an investigation. But no matter your perspective, no retaliation is acceptable—whether against the subject of the investigation, the person who brought forward the complaint, or a witness who participates in the investigation.
 - **Do:** Think about what, if anything, you can do as a manager to change your team culture or processes to address the root cause of a complaint.

Workplace investigations can be difficult for everyone involved. But ultimately, going through the process of an investigation is essential in helping correct issues that can undermine a healthy corporate culture.

Hotline:

The Augusta University and Augusta University Health System Hotline number is 800-576-6623. This confidential phone line can be used for concerns you may have about any kind of activities that may be suspect or that you have questions about. This could include, but not limited to: conflicts of interest, patient health information, receiving something of value in exchange for purchasing a service or product, time and expense abuses, research misconduct, and student and/or employee privacy issues. The Hotline provides you the opportunity to communicate your concerns with Augusta University and Augusta Health System. You will be protected from retaliatory actions and if you prefer, you can remain anonymous.