

Management of investigations Checklist

No	Aspect of the investigation	Who?	What?	When?
01	Receipt and acknowledgement of the complaint	Depends on the complaints mechanism (if any) of the organisation in question. Recipient of serious complaints should be a senior manager within the organisation.	<ul style="list-style-type: none"> Complaint should be received in a respectful and open way. Complaint should be formally acknowledged (in writing, if appropriate). Open channel of communication with the complainant should be established. 	<ul style="list-style-type: none"> This is the beginning, and what initiates all that comes after. Acknowledgement of serious complaints should be made within 24 hours, if at all possible.
02	Decision on whether to launch an investigation or not	Senior Manager, such as Director at national level, possibly in conjunction with Headquarters (where applicable).	<ul style="list-style-type: none"> Assessment of information received in complaint. Sufficient information? Degree of seriousness of alleged misconduct? Does it appear to be a breach of the organisation's policies? Have there been previous allegations? Age of survivor? Naming of Investigation Manager Are other organisations involved? Possibility of undertaking a joint investigation? 	<ul style="list-style-type: none"> Within 48 hours of receiving a serious complaint.

03	Investigation manager selected	By Director and/or senior management team.	<ul style="list-style-type: none"> • Will directly supervise the case • Reports upwards on a need-to-know basis • Selected on basis of their integrity, understanding of sexual exploitation and abuse issues, knowledge of HR practice, and ability to negotiate conflicting interpersonal and institutional interests. • 	<ul style="list-style-type: none"> • Once decision to investigate has been made.
04	Risk assessment and legal advice	Investigation Manager (with Security Adviser and Legal Adviser)	<ul style="list-style-type: none"> • Safety risks to complainant, survivor (if different from complainant), subject of complaint, witnesses, organisation's staff, investigation team. Assess, & consider measures to mitigate. • Reputational risk • Legal implications; Breach of local criminal law? Local labour law context? • Consideration of local context, culture, and associated implications for the investigation • Consent of survivor to report, if crime? • Suspension of subject of complaint? 	<ul style="list-style-type: none"> • As soon as possible

05	Victim and witness support	Investigation Manager refers to appropriate (previously mapped) local facility/service	<ul style="list-style-type: none"> • Medical • Psycho-social • Safety - removal to a safe location, if necessary 	As soon as possible
06	Safety and support of subject of complaint	Investigation Manager (with Security Adviser, where applicable)	<ul style="list-style-type: none"> • Assess potential threats to SOC's safety and ways to mitigate risks, removing SOC to neutral location, if appropriate. 	As soon as possible
07	Control of information flow	Investigation Manager	<ul style="list-style-type: none"> • Sharing of appropriate information on a 'need to know' basis only. • Maintaining confidentiality is essential • Securing of documentary and other evidence (such as computers). 	Continuous oversight and regular reassessments needed.
08	Media issues	Investigation Manager (with Media/Public Relations or Communications Team, where applicable)	<ul style="list-style-type: none"> • No details given unless necessary. • If information on the case has leaked to the media, the organisation should agree one message and all media enquiries should be channelled through an agreed focal point. 	At the beginning of the investigation. Response drawn up in advance, in order to be prepared in case of a leak.

09	Provision of resources for the investigation	Investigation Manager	<ul style="list-style-type: none"> • Personnel - Translators needed? Financial and/or IT experts? • Logistics support • Funding • Safe, confidential space for Investigation Team planning and interviews • Equipment • Security advice • Authorisation to access evidence (documents, computers, etc) 	Before and during investigation.
10	Selection and briefing of investigation team	Investigation Manager	<ul style="list-style-type: none"> • Find suitable, skilled, experienced investigators. • At least two investigators on the team, gender balanced if possible. • If investigating a senior person, consider the age/experience of the investigators. • Ideally at least one investigator has in-depth knowledge of the area and culture. • Share terms of reference with investigation team, and agree timescale. • Contracts, if investigators are external. 	At beginning of investigation.

11	Integrity of the investigation	Investigation Team and Investigation Manager have joint responsibility for this.	<ul style="list-style-type: none"> • Well-defined policies, including on confidentiality • Clear written terms of reference and investigation procedures • Confidentiality maintained • Independent investigators • Thorough, well-planned and systematic investigation. • Appropriately qualified and experienced investigators. • Manager has oversight. 	Investigation should be completed within a defined timeframe. If the timeframe cannot be met, the Investigation Team should provide the Manager with proper notification and justification for the need to extend.
12	Planning of investigation	Investigation Team, with input from Investigation Manager	<ul style="list-style-type: none"> • Logistics • Documentary evidence needed • Visits to relevant sites • Who to interview, where and in which order? • Consideration of local cultural context • Liaise with other organisations and local authorities as necessary 	Before starting the investigation, and keeping under review as the investigation proceeds.

13	Liaison with investigation team during investigation	Investigation Manager	<ul style="list-style-type: none"> • Available to discuss issues and concerns that arise during the investigation, including the possibility of additional alleged breaches surfacing. • Mindful of safety and welfare of the investigation team. • Monitor the investigation team's respect for principles and organisational procedures for investigations. • Liaise with Head Office and managers at the site of the investigation. • Manage the relationship between the investigation team and the rest of the organisation. • Assist the team in accessing background material and/or documentary evidence. 	Throughout the investigation.
14	Gathering of evidence	Investigation Team	<ul style="list-style-type: none"> • Collecting and securing documentary evidence, computer equipment (where appropriate), records of site visits and records of interview testimony. 	Systematically during investigation.

15	Writing investigation report	Investigation Team	<ul style="list-style-type: none"> • Separate reports for each Subject of Complaint. • Evidence to prove or disprove each element of each alleged breach presented systematically and clearly. • Investigation Team finding for each alleged breach is listed • Findings can be: <ul style="list-style-type: none"> ○ Complaint upheld ○ Complaint not upheld (evidence to disprove) ○ Complaint not upheld (insufficient evidence) • Recommendations for changes of policies and/or procedures listed in separate Management Observation Report. 	Following collection of evidence.
16	Review of final report	Investigation Manager, with support from management team, as appropriate	<ul style="list-style-type: none"> • Review. • Decision to accept findings or seek additional information. • Planning for steps to be taken to follow up on investigation. 	As soon as report is submitted.

17	Actions following the investigation	Investigation Manager, with support from management team, as appropriate – in particular, Human Resources Department and Legal Adviser.	<ul style="list-style-type: none"> • Disciplinary action, hearing, dismissal, if breach of contract • Possible referral to authorities? • Ongoing support to survivor(s)? • Appropriate feedback to complainant, victim, subject of complaint, witnesses, community, staff team, as necessary. • Mitigation of damage to subject of complaint’s reputation, if cleared • Provide training, monitoring, to address identified poor practice of subject of complaint, if appropriate. • Mitigation of damage to relationship with the community • Managing morale of the staff team • Follow up on Management Observation Report • Review risk matrix and strengthen measures to prevent sexual exploitation and abuse in future, as necessary. 	<ul style="list-style-type: none"> • Within one week of submission of investigation report. • Ideally, this stage should be reached within 28 days of receipt of the original complaint.
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