

SCCE Internal Investigations Workshop
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A Day in the Life of an Internal Investigator – Group Exercise

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Agenda



Working in small groups

- Review and Analyze the following case scenario
- Develop an internal investigations action plan
- Identify relevant documents to be gathered and reviewed
- Identify witnesses and subject matter experts to be interviewed
 - List questions you would like to ask of 2 potential witnesses
- Determine a methodology for dealing with the implicated person(s)
- Assess potential outcomes based on the relevant facts
- What will you say to your Steering Committee at the next meeting?

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A Day in the Life of an Internal Investigator

What we know so far: Recently, the company's Ethics and Compliance Helpline received a call from an anonymous reporter claiming to be an employee in the Procurement Organization. The reporter stated that Mark Casey had recently bid on an open manager's position that reported to the Director of Procurement and Subcontracts, who had recently been reorganized under the Sr. Director of Supply Chain. The Sr. Director of Supply Chain, Jack Casey, happens to be Mark's father. The reporter was concerned because there were several individuals in the Subcontracts Department who had many years of experience and were much more qualified for the position than Mark Casey. The reporter believed Mark Casey was a shoe-in for the job because the current Director of Procurement and Subcontracts, Joe Murphy, was a good friend of Jack Casey. The reporter stated, "the whole thing is rigged and reeks of conflict of interest". Within a few days, two more calls were received by the Helpline from anonymous reporters stating they were concerned about learning that Mark Casey had bid on the open manager's position in their department. One of the reporters also stated that Jack Casey, while Director of Procurement and Subcontracts, approved a two year maintenance service contract to a company owned by his sister and brother-in-law. In addition, another manager in the Procurement Organization met with the Ethics and Compliance Officer to express his concerns for the potential job bid action by the son of his bosses' boss. He stated that his current boss is being placed in a very tenuous position and believes he should not be the person to make the hiring decision in this situation. He also stated that from what he heard from other managers in the company that Mark Casey is an exceptional employee who has received excellent performance evaluations and is well respected by his current manager and coworkers.



A Day in the Life of an Internal Investigator



Background: Jack Casey is the Senior Director of Supply Chain at a Fortune 500 Company. He is considered by many of his peers to be a very capable leader and a man of high integrity. In his past position as Director of Procurement and Subcontracts he issued a strict directive prohibiting the giving or receiving of gifts or gratuities regardless of the value by any employee in the Procurement Organization. This directive was in sharp contrast to the Corporate Policy allowing the giving or receiving by employees of gifts or gratuities that do not exceed \$100 nor given or received with the intent to influence a business decision. Many employees in the Procurement Organization voiced their concerns that they could not even accept items having little or no intrinsic value such as coffee mugs, calendars, pens, caps, etc. from suppliers. Procurement employees were also prohibited from receiving meals or refreshments from existing or potential suppliers. However, they were allowed to pay for meals of suppliers in support of business meetings. Mr. Casey has three sons; Alan, Mark, and Steven who all currently work for the company in various departments. They all joined the company being hired into entry level positions upon graduating from college. Alan is an accountant currently working in Accounts Payable. Mark is a Quality Engineer who works in Supplier Quality and Steven is a Program Planner on the company's largest Government Program. The company has a Policy and Procedure that allows employees to bid on open positions in other departments provided the employee has been in his or her current position for at least two years and has had no job performance or disciplinary actions within the same period. The company also has a Conflict of Interest Policy prohibiting employees from supervising an immediate family member. Historically, the company has encouraged the employment of family members provided there are no conflicts of interest.

A Day in the Life of an Internal Investigator

Your Challenge: As the Chief Ethics and Compliance Officer / Investigator, you just happen to have an Ethics & Compliance Steering Committee meeting scheduled for tomorrow.

- How will you address this newly raised concern with the E&C Steering Committee?
- What information can you gather in time to present and seek additional guidance from your E&C Steering Committee?

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A Day in the Life of an Internal Investigator

The Opportunity: You are able to interview two people prior to your meeting with your Ethics & Compliance Steering Committee meeting tomorrow.

- Who are the two people you would like interview to help you prepare for your meeting?
- Develop a set of questions to ask the individuals you chose to interview.
- Be prepared to meet with those individuals face to face and ask your questions.

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The Interviews

Discussion

Questions?

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