

Complete Healthcare Compliance Manual

Resource: Sample Internal Investigations Policy

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The Company takes all reports of misconduct and policy violations seriously and seeks to address any misconduct as early as possible and prevent the recurrence of future situations. The Company will appropriately investigate all claims of misconduct or wrongdoing brought to its attention, regardless of the reporting channel, and will take appropriate steps (disciplinary or otherwise) to investigate and address policy violations. All employees and representatives of the Company are required to comply with this policy.

I. Reporting Channels

The Company expects employees to report suspected or potential policy or legal violations internally through any one of various channels, including: their direct supervisor, any member of management, the Human Resources Department, the Legal Department, the Chief Compliance Officer, and/or the Compliance Helpline.

This provides the Company the opportunity to undertake an investigation and remedy any wrongdoing.

1. Reporting Issues or Concerns.

The Compliance Helpline allows for reports 24 hours a day, 7 days a week via an independent third-party vendor. Such complaints may be made via telephone at [PHONE NUMBER] or online at and can be reported anonymously.

Any reports made, whether anonymous or not, should include as much detail as possible, in order to allow the Company to investigate the matter appropriately. Important details may include, for example, the names of the people involved in or witnesses to the incident(s), the dates and times of the incident(s) (approximate or exact), where the incident(s) occurred, and why the person believes the incident(s) should be reported. Insufficient detail may result in an inability for the Company to address the matter appropriately.

Any employee who believes that they may have been personally involved in misconduct or a policy violation is still expected to report such incidents. Self-reporting will be considered when deciding whether or what disciplinary action is appropriate.

2. **Cooperation.** Employees are expected and required to cooperate fully with any Company-designated investigators, providing truthful information. Any person who fails to cooperate with a Company investigation or intentionally lies to or misleads Company investigators will be subject to disciplinary action up to and including possible employment termination.
3. **Confidentiality.** While the Company cannot guarantee confidentiality in every circumstance, it will make every effort to protect the identity of any employee making a report in good faith. Such information will be shared only on a need-to-know basis with individuals responsible for investigating and/or otherwise resolving the concern. For each investigation undertaken, the Company will consider whether it is appropriate to require those employees interviewed as part of the investigation process not to discuss the

matter with others and to maintain confidentiality.^[1]

4. **No Retaliation.** The Company does not tolerate retaliation against individuals for reporting issues of potential policy and/or legal violations in good faith.
5. **Evidence Preservation.** Employees who have been informed or become aware of ongoing investigations for which they have potentially relevant records (i.e., email, instant messages, files, notes, photographs, recordings, etc.) must retain these records and provide them to the company. Any person who knowingly destroys potentially relevant records or information will be subject to disciplinary action, up to and including the possible termination of employment.

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