

General Principles for Intake and Evaluation

PREAMBLE

The Conference of International Investigators (CII) has endorsed the Uniform Principles and Guidelines for Investigations (“Investigations Guidelines”).¹ These General Principles for Intake and Evaluation supplement the Investigations Guidelines and were endorsed by the CII at its 21st Conference in May 2021.

The purpose of these General Principles is to provide non-binding reference and guidance for the Intake and Evaluation process undertaken by an Organisations’ Investigative Office.² They address paragraphs 27 to 32 of the Investigations Guidelines which describe the Intake and Evaluation process as one where an Investigative Office receives, registers, screens, and evaluates an allegation/complaint of wrongdoing to determine whether there is a legitimate basis to warrant an investigation.

The scope and detail of the Intake and Evaluation processes remain within the discretion of each Organisation. It is to be conducted by qualified investigations’ personnel.³ The Intake and Evaluation processes should be undertaken in line with the principles of objectivity, impartiality and fairness as outlined in the Investigations Guidelines.⁴ The present text aims to contribute to consistency, accuracy, transparency, accountability, and efficiency during this stage of the Investigative Office’s activities.

These General Principles do not, and are not intended to, bind any Organisation, its Investigative Office, or its personnel; confer, impose, or imply any duties, obligations, or rights on them or on any third parties; or affect their rights and obligations under applicable rules, policies, and procedures (their “Policies”), including any privileges and immunities afforded to them by international treaty, customary international law, or the laws of any respective member state. These General Principles are to be utilized within the framework of each Organisation’s Policies and the exercise of an Investigative Office’s professional judgment and expertise.

INTAKE

1. Intake begins with receiving reports of allegations/complaints of wrongdoing from sources⁵ through dedicated centralised channels (email accounts, telephone hotlines, online referral forms, mail)⁶ that are accessible both within and outside a given Organisation. The Investigative Office should accept all incoming allegations/complaints irrespective of their source, including allegations/complaints of wrongdoing from anonymous or confidential

¹ The Investigation Guidelines were endorsed by the Fourth CII in 2003. The second edition was endorsed by the Tenth CII in 2009.

² Consistent with the Investigation Guidelines, “Organisation” includes all institutions participating in the CII, and “Investigative Office” refers to the units or functions of an Organisation mandated to investigate allegations of wrongdoing—as defined by the Organisation—within the Organisation or associated with its projects and activities.

³ Investigative Offices across Organisations vary in size and composition. However, regardless of the number of people handling Intake and Evaluation, preferably, these tasks should be performed by experienced personnel who can aptly grasp the issues raised in the complaint, analyse the facts, and make sound decisions. Each institution should evaluate the skills that are relevant to the Intake function based on the type of complaints more commonly received.

⁴ See: Investigation Guidelines, General Principles, para 3.

⁵ The source is the origin of an allegation/complaint of wrongdoing. Depending on the institution, it can be internal (e.g., staff members, contractual employees, functional departments, audit findings, media reviews, information and/or findings emerging from investigations) or external (e.g., beneficiaries, vendor personnel, implementing partners, members of the general public, governmental institutions, National Authorities, International Organisations, IFIs, MDBs).

⁶ This does not exclude the possibility for matters to be lodged through other means, for example in person, or through a phone call directly to an investigator, or any other channel not listed here.

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sources.⁷ New allegations detected/discovered by the Investigative Office may also be processed as per the present principles.

2. For situations where the allegations/complaints involve a member of the Investigative Office, Intake and Evaluation personnel will follow internal protocol to avoid actual or perceived conflicts of interest in the assessment of the allegations/complaints.
3. Once received, in conformity with applicable procedures and rules, a report is screened to determine whether it is relevant to the Investigative Office's mandate and if it should be further processed. Where practicable, Intake and Evaluation personnel will acknowledge receipt.⁸ Communicating with sources should be timely, in line with each Office's internal procedures. Each organisation should determine the appropriate protocol to follow in respect of allegations/complaints deemed not relevant to their mandate. To ensure appropriate follow-up, it is preferable that in the absence of a dedicated intake team/personnel, complaints are assigned to specific individuals for action.
4. As a minimum, allegations/complaints of wrongdoing should be registered within the Office's Information Tool by assigning them a reference number/case identifier.⁹ The Investigative Office needs to maintain an Information Tool. This can be any tool or ensemble thereof that enables it to achieve the following:
 - a. Register the complaint information.
 - b. Create a case and case file based on the information received.
 - c. Track the case throughout its various stages from intake to closure.
 - d. Ensure that all case information and evidence¹⁰ is safeguarded in an independent location¹¹ and maintain confidentiality and evidence integrity.
 - e. Manage case related documentation and evidence.
5. While these Information Tools may vary from one Office to another, the mechanism(s) should be consistent, allegations/complaints presented functional and ensure continuity and confidentiality.
6. Based on available information, the Intake and Evaluation personnel will review the, referencing the rules and regulations to determine the type of misconduct or wrongdoing that may have occurred.¹²
7. At the end of the intake process, the Investigative Office should have a thorough and accurate record of the information received to enable a comprehensive evaluation.

⁷ See: Investigation Guidelines, General Principles para 27.

⁸ It is understood that not all Investigative Offices have dedicated personnel for the Intake and Evaluation processes. Therefore, the term Intake and Evaluation personnel refers to any personnel tasked with the Intake and/or evaluation of an allegation/complaint. In some circumstances an Organisation may choose to act in respect of Spam messages according to their internal procedures.

⁹ While certain offices may assign a different number at each stage of the case, there should be a way for a given case to be identifiable and trackable throughout the investigative process.

¹⁰ "Evidence" consists of any information that tends to prove or disprove a factual claim.

¹¹ This could be a shared drive for instance. The primary information should not be saved on any individual's device.

¹² It is noted that the initial categorisation of the Intake and Evaluation teams does not constitute the final legal determination, which others may revise later, at any step of the investigative and disciplinary process.

EVALUATION

8. Once registered, and having established the mandate of the Investigative Office, an allegation/complaint of wrongdoing is evaluated to determine whether there is sufficient basis to open an investigation. The Investigative Office has exclusive and independent authority to determine whether to proceed with or close the allegation/complaint, to refer the allegation/complaint to another office or Organisation, or to take any other action it deems appropriate. The Intake and Evaluation processes should be performed in a timely manner, in line with the Office's priorities.
9. The Investigative Office may also consider authorising special measures necessary to secure evidence that is at risk of loss and/or tampering.¹³
10. The Intake and Evaluation personnel assess:
 - a. Credibility – the allegation/complaint together with available evidence supports that there is a reasonable factual basis to suspect that wrongdoing or misconduct may have occurred.
 - b. Materiality – the alleged facts, if established, could potentially amount to wrongdoing or misconduct as defined by the Organisation, and the allegation is of sufficient gravity or severity (e.g., cases of sexual misconduct, or cases involving high ranking individuals or high financial risk) to warrant an investigation.
 - c. Verifiability/feasibility – a full investigation is feasible based on: (i) the length of time that has elapsed since the alleged wrongdoing occurred; (ii) the specificity of the information received; (iii) the availability and accessibility of necessary records, witnesses, and other evidence; and (iv) whether an investigation is likely to result in a conclusive outcome.
 - d. Other relevant considerations – case priority, proportionality, availability, and suitability of other offices within the Organisation, operational resources, etc.
11. At this stage, an Investigative Office may assign a level of priority¹⁴ to a case based on a set of predetermined factors that the Investigative Office establishes according to its needs, capacity, and level of complexity of allegations/complaints received.¹⁵

CASE PRIORITISATION

12. For timely and efficient management of its caseload, an Investigative Office may wish to establish a set of criteria that will assist in deciding where a case fits in terms of priority to determine the resources that will be allocated to its investigation. Case priority is dynamic and may change throughout the investigative process as new information becomes available. Some of the factors an Investigative Office may wish to consider when determining case priority are set forth below:
 - a. Time sensitivity - factors that require the case to be addressed as a matter of priority, such as the risk of ongoing financial loss or the potential loss of evidence.
 - b. Impact on the Organisation - scale of potential financial loss, reputational damage, etc.
 - c. Type of allegation - for example, sexual exploitation and abuse (SEA) cases usually have shorter deadlines for completion.

¹³ This includes digital evidence or any other form of physical evidence that may be at risk. Digital evidence is defined as information and data of value to an investigation that is stored or transmitted in digital form.

¹⁴ This may be High, Medium, Low or any other type of rating the Organisation chooses.

¹⁵ See the "Case Prioritisation" section.

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- d. Grade/position of the parties - potential senior management involvement.
 - e. Type of parties involved - staff, implementing partner, government entity, vendor, etc.
 - f. Proximity in time of alleged wrongdoing - historical or ongoing issue.
13. During the evaluation, the Intake and Evaluation personnel, as needed, gather additional basic information regarding the allegation/complaint, identifying and securing available evidence (documentary and testimonial).
14. At the end of the Evaluation, the responsible personnel will, in line with internal procedures, make a written recommendation as to the next steps to take with regards to the allegations/complaints. The outcome of each evaluation should be the result of an objective analysis of the relevant evidence and should be sufficiently documented to explain the resulting decision.
15. The Evaluation may result in one of the following outcomes or a variation thereof:¹⁶
- a. The matter warrants further review in line with the Office's internal procedures.
 - b. The matter is closed because: (i) there is insufficient information to warrant further investigation; (ii) an investigation will likely not result in a conclusive outcome; (iii) an investigation is no longer practicable because the evidence has been destroyed, witnesses are no longer available, the incidents are too remote, (iv) the allegations are unfounded; or any other reason that may apply.
 - c. Another office would be better placed to resolve the matter, and the allegations are referred accordingly.
16. Offices may wish to consider notifying the outcome of the evaluation process to the complainant or any relevant parties as appropriate. The evidence and information collected during the Evaluation should be stored in line with the Investigative Office's internal procedures and may form part of the record of the investigation.
17. Each Investigative Office should determine who will review the Evaluation and recommendation of the Intake and Evaluation professional and endorse the outcome of the Evaluation, once finalised. However, to ensure proper separation of duties, it is recommended that this be done by a manager or supervisor within the Investigative Office.¹⁷ As with case information, any documentation relevant to the Intake and Evaluation processes and the outcome thereof should also be recorded in the case's files.

GENERAL CONSIDERATIONS

18. Investigative Offices should be guided by the general principles established in the Investigation Guidelines in maintaining independence, respecting confidentiality, objectivity, and fairness, and keeping free of any conflict of interests throughout the intake and evaluation processes.
19. The present document aims at providing general guidance to Investigative Offices and does not address the intricacies inherent to the work of the various Organisations they are called upon to serve. In using this document, Investigative Offices will need to consider the specific mandate and general legal framework applicable to their respective Organisations.

¹⁶ Depending on the type of organisation or entity to which they are attached, and subject to their needs and internal policies, Investigative Offices may have additional outcomes to those listed.

¹⁷ If the Investigative Office has a specific team dedicated to Evaluation, the process should be vetted by a manager or supervisor who is not part of the team.

PUBLICATION AND IMPLEMENTING GUIDELINES

20. These General Principles have been endorsed by the CII. Any Organisation may refer to these General Principles in its own Policies or may publish them itself in accordance with its Policies. In addition to these General Principles, the CII may develop and publish detailed *Implementing Guidelines for Intake and Evaluation* to be used for reference as needed, as further non-binding guidance for Investigative Offices in their Intake and Evaluation investigative activities.