

**Emerging Issue:**

**Confusion About  
Investigative Program  
Ownership/Responsibility**

The Security Executive Council (SEC) is frequently tasked by organizations to examine their investigations programs. In particular, they want to analyze ownership, roles, and responsibilities as it relates to the various investigative programs within the organization.

Over years of doing this work the SEC has found that many organizations experience what we call “investigative confusion.” This can occur when there are responsibilities for various aspects of investigations spread across multiple business functions but there is a lack of inter-departmental communication and reporting. This lack of singular oversight ultimately generates redundancies or inefficiencies that could result in company brand damage or monetary loss.



The remainder of this overview addresses the issues surrounding divergent investigative programs and what can be done to defeat “investigative confusion.”

# The Current State of Investigations

After working with many organizations the SEC has found that organizations may be responsible for up to 67 different types of investigations and up to 13 different business functions could be engaged in these investigative activities.

## Issues We Often See Include:

- Untrained people conducting investigations
- Multiple reporting systems
- Confusion over who's in charge
- No corporate oversight
- Higher risk for defamation and wrongful termination lawsuits
- Higher risk for regulatory violations

# What the CSO Should Be Thinking

You may want to take responsibility for all investigations  
– or you may not.

However, in a situation where many functions claim responsibility for investigations the role of the security executive can be to facilitate role definition, organizational responsibility, and priorities.

This will help the company improve quality, reduce cost, and reduce duplicated or conflicting investigative services.

# What the CSO Should Be Doing

Conduct research to assess the types of investigations by functions and whether they feel they are the lead or in a support role. Identify redundancies or cases when no one claims a lead role. Identify what each group is doing around reporting, training, and investigative procedures

Want a good use for a buzz-word?

Centralized reporting of investigations provides the opportunity for the application of “big-data” analyses that are not possible if each business unit is conducting their own types of investigations without a centralized reporting structure.

# Investigative Confusion in the Wild

This is an example from one organization...

Ethics	Privacy	IT	Ops Investigations	HR	Global Security	Other
<ul style="list-style-type: none"> <li>•Internal Resources</li> <li>•<b>LEAD</b></li> <li>•Conflict of Interest</li> <li>•<b>SUPPORT</b></li> <li>•Anti-trust violations</li> <li>•FCPA</li> <li>•Non-FCPA graft-bribery</li> <li>•Supplier kickbacks</li> <li>•Federal sentencing guideline violations</li> <li>•Benefits fraud</li> <li>•Financial fraud</li> <li>•Forgery</li> <li>•Embezzlement</li> </ul>	<ul style="list-style-type: none"> <li>•Internal Resources</li> <li>•<b>LEAD</b></li> <li>•Regulatory guideline violations (HIPPA/SOX/PCI)</li> <li>•Unauthorized use of proprietary info;</li> <li>•Company records</li> <li>•Supplier background investigations</li> <li>•M&amp;A due diligence inves</li> <li>•Safety violations</li> <li>•Company policy violations</li> </ul>	<ul style="list-style-type: none"> <li>•Mixed Resources, Internal &amp; Outsourced</li> <li>•<b>LEAD</b></li> <li>•Regulatory guideline violations (HIPPA/SOX / PCI)</li> <li>•Unauthorized use of proprietary info;</li> <li>•Company records</li> </ul>	<ul style="list-style-type: none"> <li>•Mixed Resources, Internal &amp; Outsourced</li> <li>•<b>LEAD</b></li> <li>•Benefits fraud</li> <li>•Counterfeit products labeling</li> <li>•<b>SUPPORT</b></li> <li>•M&amp;A due diligenc invest</li> <li>•Leg</li> </ul>	<ul style="list-style-type: none"> <li>•Internal Resources</li> <li>•<b>LEAD</b></li> <li>•Conflict of Interest</li> <li>•Benefits fraud</li> <li>•Unauthorized use of internet</li> <li>•Embezzlement</li> <li>•Harassment: <ul style="list-style-type: none"> <li>•associate/ associate</li> <li>•associate/ customer</li> <li>•Threats/ intimidate/ stalking</li> </ul> </li> <li>•Unauthorized investigation</li> </ul>	<ul style="list-style-type: none"> <li>•Internal Resources</li> <li>•<b>LEAD</b></li> <li>•Threats/ Intimidate/ stalking</li> <li>•Unexplained</li> <li>•damage/ disruption</li> <li>•Unauthorized</li> <li>•Solicitation</li> <li>•Illegal drug related</li> <li>•<b>SUPPORT</b></li> <li>•Conflict of Interest</li> <li>•Legal issues</li> <li>•Anti-trust violations</li> <li>•FCPA</li> <li>•Non-FCPA</li> <li>•Graft-bribery</li> <li>•Supplier kickbacks</li> </ul>	<ul style="list-style-type: none"> <li>•Mixed Resources, Internal &amp; Outsourced</li> <li>•<b>SUPPORT</b></li> <li>•Regulatory guideline violations (HIPPA/SOX/PCI)</li> <li>•Legal Issues</li> </ul>

Notice multiple business functions claiming the lead role on the same types of investigations and types of investigations in which no one is leading

# Eliminating Investigative Confusion with...

## Unified Risk Oversight™

Eliminating investigative confusion is just one element of what a Unified Risk Oversight™ process addresses.

For “Investigative Confusion,” a Unified Risk Oversight™ process has the potential to:

- Reduce duplicated or conflicting services
- Reduce the risk, liability, and legal exposure for the company
- Enhance communications and increase awareness of senior management to risk, threats and issues affecting the business
- Reduce cost

The Security Executive Council has the experience and expertise to help you implement Unified Risk Oversight™ within your organization. (Read more about Unified Risk Oversight here:

<https://www.securityexecutivecouncil.com/spotlight/?sid=26608>)



# About the Security Executive Council (SEC)

We are a research and advisory firm for security leaders. We have a collective of close to 100 security subject matter experts that have been successful security executives or are recognized industry experts in their field. The resources and tools we develop are constantly evolving to provide maximum value. Some engage with us by way of multi-year “retained” services agreements (Tier 1 Leaders™). Tier 1 Leaders are those that want support on an ongoing basis but also want to have an active role in identifying solutions for the industry. Others come to us for a specific solution to a contained issue. In all the ways people engage with the SEC the bottom line goal is to help define and communicate the value of the Security organization. Contact us today to learn more: [contact@secleader.com](mailto:contact@secleader.com)

Read more: [www.securityexecutivecouncil.com](http://www.securityexecutivecouncil.com)

