

Investigations

Criteria for Written/Summary/Verbal Investigation Reports



There is no legal requirement or entitlement to a particular level of report. Ultimately, the evidence which underpins any report (interviews, testimonies, e-mails, physical evidence, etc.) is what an arbitration and court decisions are decided upon. The decision for the level of reporting should be made at the conclusion of the investigation. The criteria below are intended as guidance. When in doubt consult with the relevant BCPSA LR Branch Director/Manager.

Full Report:

1. Significant actions are substantiated and, as such, the potential for termination is quite high.
2. Significant actions would include:
 - a. severe actions (on-duty or off-duty)
 - b. actions which have the potential to harm the employers reputation (there is some level of public profile)
 - c. potentially criminal
 - d. serious impact to operations
 - e. complex issues where there are multiple forms actions, breaches, and Statutes in play
 - f. hybrid disability/inappropriate conduct (Gooding Case)
3. Termination was strongly considered at the outset (when matter was initially reported) and the investigation indicates actions were not as significant or there are substantial mitigating factors
4. Sensitive issues involving senior government employees
5. Complaint involves a formal collective agreement or similar process (e.g. article 1.7, 1.8, 32.15, MOU#13, etc)

Summary Report:

1. Actions are substantiated and the potential outcome is non-major.
2. There are not many findings which would be considered by a reasonable person to be highly sensitive or concerning
3. The issues are not complicated and the level of information needed to understand the issue is not significant
4. Not many individuals needed to be interviewed
5. Findings could reflect a 'loss of confidence' in an employee (as opposed to a breach of terms of employment, standard of conduct, etc.)

Recommended Format:

- Incident
- Names of complainant, respondent, witnesses
- Interviews (date, who, etc.)
- Evidence (include analysis as part of evidence)
- Findings

Verbal Report:

1. Short suspension is likely



2. Closing off a duty to inquire
3. The matter is unfounded and uncontentious
4. Very few people involved
5. Employment actions by complainant/respondent conclude the investigation early
 - a. Resignation
 - b. Retirement
 - c. Extended Long term Disability
6. Verbal reports should be followed up with an e-mail and note to CRM indicating that a briefing occurred, the ERS has been informed, and what, if any findings have been made

EMPLOYEE HANDOUT

WORKPLACE INVESTIGATIONS



This document is a handout to employees that provides general information about the investigative process, and explains the roles and responsibilities of individuals who are involved in the process.

Overview

Supervisors and managers are representatives of the employer and are responsible for investigating issues regarding employee conduct and/or performance. Investigations are fact-finding exercises to determine what occurred, by whom and why.

All investigations of alleged serious misconduct must be led by the BC Public Service Agency (the Agency) or Agency-approved investigators. In some instances, a ministry representative may be assigned to co-investigate.

Investigative Process

Investigations must be fair to all individuals involved in the process and must be conducted in an objective and open-minded manner.

An investigation typically involves one-on-one interviews with individuals as well as a review of potentially relevant documents, such as e-mails, records, policies and procedures. Usually, the person who filed the complaint (the Complainant) is interviewed first, followed by interviews of witnesses, followed by an interview with the person responding to the complaint (the Respondent), followed by interviews of additional witnesses identified by the Respondent.

During investigations, respondents are given sufficient information about the allegations against them in order to respond to the complaint. The specifics of the disclosure will be determined on a case-by-case basis.

For bargaining unit employees, an investigation will follow applicable collective agreement procedures. A union member has the right to representation during an interview that the employee believes might result in disciplinary action, but can request union representation regardless of the role they play. Respondents are strongly encouraged to secure such representation as disciplinary consequences may flow from an investigation.

Non-union employees may bring an uninvolved individual as support.

Employees are expected to treat the complaint, investigation and interviews as strictly confidential. Information obtained during, or commentary about, an investigation, including the outcome, should not be shared with others at the workplace, with the exception of one's union representative, or support person for a non-union employee.

No individual should be subject to indirect or direct retaliation as a result of filing a complaint, responding to a complaint or participating in an investigation. Complaints of retaliation will be fully investigated and any retaliation, once confirmed, will be addressed.



Roles and Responsibilities

- **Witnesses/Complainants/Respondents** must participate in investigation meetings when directed to do so, and have a responsibility to cooperate and be honest and forthright.
- **Assigned Investigators** work collaboratively to gather evidence and interview relevant parties about the complaint or concerns before them. The scope of the investigation is based on the nature of the complaint and the applicable standards of conduct, human resources policies, procedures, collective agreements, contracts of employment and legislation.
- **Union Representatives and Non-Union Support Persons** provide a supportive role for the person who requests their assistance in an investigation meeting. Union representatives and non-union support persons observe the interview. If the witness, complainant or respondent require assistance from the union representative or non-union support person, a break or caucus is granted.

Post Investigation

Once the interviews of individuals and review of documents has been completed, the investigators analyze the information obtained and determine what happened; often called the “findings of fact”. These findings are measured against the applicable Standards of Conduct, Human Resources policies, collective agreements, or legislation identified as within the scope of the investigation to determine whether and to what extent a breach has occurred.

The investigator will report out on the findings and conclusions of the investigation to the designated ministry representative. The ministry representative, usually in consultation with an Agency Employee Relations Specialist (who is not the investigator), determines if further action is required and if so, what action is appropriate.

The ministry representative will communicate the general outcome of the investigation to the complainant and respondent separately. In order to respect and preserve individual rights to privacy, any detailed action that is implemented as a result of the investigation is communicated to the impacted individual only (with their union representative or non-union support person). The investigation findings are only shared with the appropriate management representatives.

Support

Employees who are members of the the BCGEU may seek support by calling the union at 1-800-663-1674. Employees who are members of another union or association are encouraged to seek support from that organization.

Counselling support is available for employees during an investigation, post-investigation or at any time. Call Morneau Shepell at 1-800-655-5004 or access through www.workhealthlife.com.

Should you have any concerns regarding the investigative process that are not appropriate to raise with the investigators, please contact Ken McLean, Director of Employee Relations at the BC Public Service Agency (t: 778-698-5856, e: kenn.mclean@gov.bc.ca).



For internal PSA Employee Relations purposes only

PSA Suspension Pending Outcome of Investigation Guidelines

Suspensions Pending the Outcome of an Investigation

In investigations involving allegations of serious employee misconduct, Employee Relations Specialists will need to assist managers in determining whether it is appropriate for the employee under investigation to remain in the workplace during the investigation. In the event the employee is suspended, it is also necessary to determine if the employee should be suspended with or without pay.

Should the employee be suspended pending the outcome of the investigation?

The assessment for determining whether an employee who may be guilty of misconduct should stay on the job or be relieved of his or her duties while an investigation is conducted must be done in the light of a balancing of interests between employer and employee. If the alleged misconduct is related to the employment relationship and the continued employment of the employee would present a serious and immediate risk to the legitimate concerns of the employer, then a suspension may be justified. Such a suspension is not disciplinary in nature if it is protective to the interests of the employer.

The ministry manager and Employee Relations Specialist must engage in a considered assessment of whether it is reasonable to suspend the employee based on the following considerations:

1. Can the continued presence of the employee at work be considered to present a reasonable serious and immediate risk to the legitimate concerns of the employer? This requires assessing the risk that is posed in the event the allegations are founded.
2. Can it be established that the nature of the allegations is potentially harmful or detrimental or adverse in effect to the:
 - a. employer's reputation?
 - b. employee's ability to properly perform their duties?
 - c. employer's other employees or the public?
3. Is adequate information available to determine that the initial allegations are credible?
4. Have reasonable steps been taken to ascertain whether the risk of continued employment might be mitigated through techniques such as closer supervision or a transfer?

If the employee is suspended pending the outcome of the investigation, the reasons for the suspension must be included in the letter of suspension. During the period of suspension,



the Employer must consider the possibility of re-instatement if new facts or circumstances arise.

Should the employee be suspended without pay during the investigation?

If a suspension pending the outcome of the investigation is warranted, the employer must consider whether the suspension should be with or without pay.

Bargaining Unit Members

For bargaining unit employees, suspensions without pay are permitted under the collective agreement; however, the general practice is to suspend employees with pay. Suspensions without pay can be considered if the following criteria are met:

1. The level of alleged misconduct is considered to be considered high and would result in a lengthy suspension or termination if substantiated;
2. The preliminary evidence gathered in relation to the allegation(s) at the time of temporary suspension is compelling. Hearsay evidence, on its own, is not sufficient.
3. The nature of, or circumstances giving rise to, the alleged misconduct cannot be reasonably interpreted to be motivated solely by altruistic reasons or in the name of serving the public good, e.g. whistleblowing or protecting the environment.
4. A suspension without pay must not negatively impact the conduct of the investigation.

The approval of the ADM of Employee Relations is required for any suspension without pay of a bargaining unit employee. Exceptions to the above criteria require the approval of the DM of the PSA. If the Employee Relations Specialist believes that a suspension without pay would be an appropriate response, he/she should consult with a director.

During the period of suspension of a bargaining unit employee, the Employee Relations Specialist should consider the possibility of changing the status of a with or without pay suspension if new facts or circumstances arise. The Specialist should consult with a director in such a case. The approval of the ADM of Employee Relations is required before changing the with or without pay status of any suspension pending the outcome of an investigation.

Excluded employees

For excluded employees, a suspension without pay raises the potential for constructive dismissal and must not be pursued. All suspensions of excluded employees pending an investigation into alleged misconduct must **always** be with pay. No exceptions to this policy are permitted.



Investigator

- Guide and direct the investigative process and manage timelines
- Ensure current best practices are being followed (i.e. investigation handout, policy on recording, ensuring invites are accurate and contain relevant level of detail)
- Liaise with other investigative agencies within the public service (i.e. OCIO, OCG)
- Take the lead on questioning
- Ensure co-investigator(s) is aware of responsibilities and delegate tasks
- Liaise with union or legal counsel as needed or if issue is outside of the Ministry co-investigator's role/expertise - this includes outside government agencies such as WorkSafe BC or local law enforcement agencies
- Raise issues for discussion
- Give feedback to co-investigator as appropriate
- Analyzes the information obtained through the investigation process to determine what happened (findings of fact)
- Measure the findings of facts against the applicable Standards of Conduct, Human Resource policies, collective agreements, or legislation identified as within the scope of the investigation to determine whether and to what extent a breach has occurred
- Report findings and conclusions of the investigation to the designated ministry representative (the decision-maker)

Co-investigator

- Represent the employer (the Ministry) and be the conduit to Ministry staff and conduit to Ministry specific subject matter expertise such as standards, policies, practice and culture
- Actively participate in the investigative process and collaborate with drafting interview questions, report writing, logistics, actively participate in investigation, take notes, analyzing information, measuring findings to determine breach occurrences, ask interview and probing questions when appropriate
- Reach findings with the investigator
- Raise issues to be discussed
- Remove any Ministry related barriers or timeline delays
- Give feedback to investigator as appropriate
- Provides 'generic status' updates to relevant participants
- The co-investigator must remain objective/neutral at all times in the investigations, in that they cannot be in an actual, apparent or perceived conflict of interest arising from personal relationships, reporting relationships or operational relationships/associations.



Decision-maker

- After the investigators report out on the findings and conclusions of the investigation, the decision-maker usually works with the designated PSA Employee Relations Specialist (who is not the investigator)
- Receives the findings and conclusions of the investigation and determines if further action is required, and if so what action is appropriate
- Communicates the general outcome of the investigation to the complainant and respondent separately
- Communicates to witnesses that the matter has been concluded, and thanks them for their participation
- Any detailed action that is implemented as a result of the investigation is communicated to the impacted individual only
- The investigation findings are only shared with the appropriate management representatives

Witness/Complainants/Respondents

- Must participate in investigation meetings when directed to do so, and have a responsibility to cooperate and be honest and forthright
- While witnesses/complainant/respondents must participate it is important that the investigation team communicate the importance of participating to move them to 'willingly' participate

Union Representative and Non-union Support Persons

- Provide a supportive role for the person who requests their assistance in an investigation meeting
- Union representatives and non-union support person observe the interview, and in some instances ask appropriate questions of the interviewee
- If the witness, complainant or respondent require assistance from the union representative or non-union support person, a break of caucus is requested and granted



For internal PSA Employee Relations purposes only

When an issue/incident or allegation requires an investigation and the investigation has been classified as major, an investigator/investigation team needs to be appointed. The composition of the team will vary depending on the individual circumstances of each case. It might be comprised of:

- A member of the Public Service Agency and a ministry representative as co-investigators;
- A member/members of the Public Service Agency exclusively; or
- An externally-appointed investigator.

Below are criteria to consider when establishing an investigation team. These criteria are not exhaustive and each situation needs to be considered on a case-by-case basis.

General Considerations

Members of the investigative team need to be:

- Experienced in conducting Labour Relations investigations;
- Knowledgeable about the subject matter being investigated, or have access to such knowledge where necessary (i.e accounting, IT or technical science)
- Objective/neutral, in that they cannot be in an actual, apparent or perceived conflict of interest arising from personal relationships, reporting relationships or operational relationships/associations.

Includes Ministry Co-investigator

Most files include a ministry representative and a member of the Public Service Agency as co-investigators. Factors to consider include the following:

- The ministry executive has not provided a reasonable basis for excluding ministry involvement;
- There may be a perception that the ministry is avoiding its responsibility for investigating and addressing internal personnel issues.
- The issue being investigated requires specialized operational expertise; or
- The outcome of the investigation could have significant systemic implications for the ministry;

Only Includes PSA Investigators

In certain circumstances, it is preferable to limit the investigation team to a trained PSA investigator(s). Factors to consider include the following:

- The issue is of a general nature that does not require specialized knowledge of or experience within ministry operations ;
- The investigation involves a senior manager, executive employee, etc. where ministry participation could be perceived as a conflict of interest and/or might reasonably create discomfort for internal ministry representatives; or
- Given the specific size and nature of the branch or workplace, there are limited management resources to access for the investigation.

Requires External Investigators

In certain circumstances, it is preferable to use an external investigator. Factors to consider include the following:

- The issue is high profile with significant implications within and/or outside Government and therefore requires public confidence in the findings through an external review;



- There is an actual, potential or perceived conflict of interest for anyone from the Government to be directly investigating the matter, given the issue or individuals involved;
- There is a lack of internal expertise to address and manage the legal, operational or other complexities of the issues being investigated; or
- Due to the nature and extent of the issues being investigated, there are insufficient internal resources to complete the investigation in a timely manner.



During the six month probation period, new ER Specialists will be mentored by experienced colleagues. The mentoring program operates in accordance with the following:

- During the first 3 months of the probation period, the new ER Specialist will shadow a more experienced investigator who will act as the lead on the investigation.
- During the last 3 months of the probation period, the new ER Specialist will transition to leading investigations that are not classified as “major” or “complex/sensitive”, but will be shadowed with a more experienced colleague during all investigations.

During this period, the new ER Specialist will be mentored to adhere to Employee Relations Branch practices as outlined in applicable policies, procedures, guidelines and protocols (e.g. BCPSA Investigation Roles and Responsibilities, etc.).

The mentoring program is intended to last six months, but may be extended or reduced based upon the prior investigations experience of the individual and how well the transition to the new role has gone. The written approval of the ADM of Employee Relations is required to reduce the mentoring period for any new employee.

In addition to the mentoring program, all new ER Specialists will complete the *Fundamentals of a Fair and Defensible Investigation Course* (provided by Marli Rusen) within the probation period. The completion of this training must be noted in their MyPerformance file.

Investigation Protocol

Purpose:

This protocol contains guidelines for coordinating investigations between the government investigations units (IU or "the parties") identified below. The protocol's objectives are to ensure in situations of overlapping mandates, that:

- investigations are complete, confidential, effective, efficient, fair, impartial, objective, reliable, repeatable, and timely;
- the mandate of each investigation unit is met; and
- investigations are co-ordinated in a manner that avoids duplication or interference with another unit's investigation.

This protocol does not prevent additional efforts of collaboration and co-ordination between the parties.

Investigation Units:

The following investigation units ("IU") are included in this protocol agreement:

- **BC Public Service Agency, Ministry of Finance (PSA)** – conducts investigations regarding employee conduct related to collective agreements, human rights legislation and other government policy/legislation for both included and excluded employees.
- **Corporate Information and Records Management Office (CIRMO), Ministry of Citizens' Services Privacy, Compliance and Training Branch Investigations Unit** - coordinates, investigates and resolves any actual or suspected information incidents, including unauthorized collection, use, disclosure, access, disposal or storage of government information.
- **Office of the Chief Information Officer, Ministry of Citizens' Services Security Investigation and Forensics Unit** – coordinates, investigates and resolves any actual or suspected information technology security and cyber security incidents and provides evidentiary support and analysis of digital evidence and expert advice to other investigative units.
- **Office of the Comptroller General, Ministry of Finance (OCG) Investigation and Forensic Unit** - addresses allegations of fraud or financial improprieties reported to the Comptroller General.

Contacts for the Investigation Units:

- **PSA:** Director, Employee Relations, 604-788-9476

- **CIRMO Privacy, Compliance and Training Branch Investigations Unit:** Senior Director, Investigations and Audits, 604-807-4575
- **OCIO Security Investigations and Forensics Unit:** Director Cybersecurity Intelligence and Investigations, 250-744-0955
- **OCG Investigation and Forensics Unit:** Executive Director, Investigation and Forensic Unit, 250-216-5145

Contacts will also include a delegate or deputy of the named contact.

General:

1. The contact for an IU is to immediately notify another party of reported incidents and/or of information obtained that is relevant to the mandate of that specific unit. The contacts of each IU will discuss and co-ordinate efforts, as appropriate.
2. Any collection, use, storage or disclosure of personal information by an IU must comply with the *Freedom of Information and Protection of Privacy Act*.
3. The contact for each IU will ensure that their investigators are aware and understand this protocol.
4. The expectation is that each IU will fulfil its mandate while ensuring that their investigations do not impair the mandate or investigations of any other party.
5. Ministries, agencies and their IUs will work collaboratively and share information and records in a manner that is compliant with the FOIPPA.
6. All parties are to be cognizant and respectful of the other IUs' roles, mandates and professional standards.
7. All parties and investigators are expected to follow the principles of administrative fairness to respect the rights of individuals in the conduct of investigations.
8. Incidents requiring investigation may involve circumstances that require procedural timeliness and flexibility in regards to the process outlined in this protocol.
9. Each IU is responsible for determining the scope of electronic evidence or data required for an investigation. The IU is to consult and work collaboratively with the OCIO Security Investigations and Forensics Unit to procure only the relevant electronic evidence required to complete the investigation.

10. Parties will not disclose or share information/evidence if it is not necessary to the work performed by another IU.
11. During the course of an investigation, all parties will work collaboratively with the public body that has responsibility for an investigation by providing guidance, direction and recommendations as necessary.
12. All parties will collaborate to resolve issues involving an IU in circumstances where the relevant IU cannot or should not act (e.g. conflict of interest, investigating senior officials of the same Ministry or Agency). All parties will collaborate to resolve the issue.
13. The IUs agree to follow common standards intended to ensure internal government investigations are conducted in accordance with recognized best practices. Standards are to be developed collaboratively and agreed to by the parties.
14. The IUs agree to implement and maintain robust quality assurance mechanisms to ensure investigative practices are consistent with common standards as well as individual IU legislative, policy and procedural requirements.

Notification and Communications

1. An IU must immediately notify the contact for any other IU when an incident or information obtained during an investigation is relevant to the mandate of the other IU. An initial meeting will forthwith be scheduled between the IUs involved to:
 - i. Share information about the subject incident/information.
 - ii. Confirm the IUs that have a role in the event;
 - iii. Identify the IU that should lead the investigation;
 - iv. Develop a plan and timeline for the investigation;
 - v. Identify any roles for other IUs; and
 - vi. Identify information that needs to be gathered and questions to be asked.
2. The parties acknowledge that the commitment to share relevant information with other IUs is an ongoing obligation to be met in accordance with any applicable statutes, policies and professional standards, as well as the exercise of sound professional judgement.

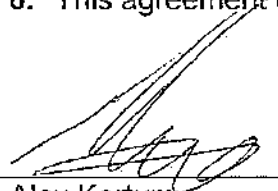
3. An IU contact will advise any other IU contact involved when a joint investigation requires notification to, or interaction with, Law Enforcement and/or Government Communications and Public Engagement (GCPE).

Dispute Resolution

4. If a dispute arises in respect of this protocol, the issue(s) will be referred immediately for joint resolution to the Government Chief Information Officer, the Government Chief Records Officer, the Comptroller General, and the Assistant Deputy Minister of PSA.
5. The Deputy Ministers of the Ministry of Finance, the Ministry of Citizens' Services and the BC Public Service Agency will be notified with a request for direction by a contact if the Comptroller General, the Government Chief Information Officer, the Government Chief Records Officer, or the Assistant Deputy Minister of the Employee Relations Division of the Public Service Agency, is the subject of an investigation.

Amendment

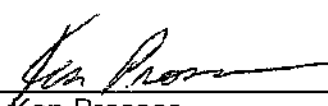
6. This agreement can be mutually amended from time to time in writing by the parties.



Alex Kortum
Executive Director
Office of the
Comptroller General
Ministry of Finance

7/24/2017

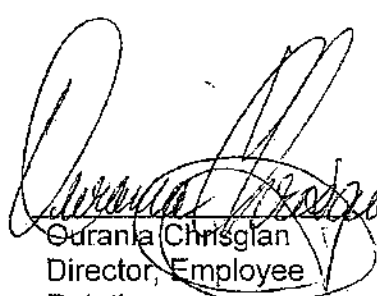
Date



Ken Prosser
Director, Cybersecurity
Intelligence and
Investigations
Office of the Chief
Information Officer
Ministry of Citizens'
Services

July 24, 2017

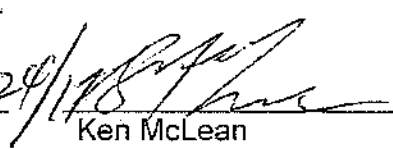
Date



Eudania Chrisglan
Director, Employee
Relations
BC Public Service
Agency

July 24, 2017

Date



Ken McLean
Senior Director,
Investigations and Audits
Corporate and
Information Records
Office
Ministry of Finance

July 24, 2017

Date



Purpose

This protocol is intended to provide guidance and clarity on matters that require escalation in relation to a major investigation. Escalation can include notice from an outside business unit to the BC Public Service Agency (PSA) Employee Relations Branch, or within the branch from an Employee Relations Specialist (ERS) to a management representative.

The protocol is further intended to clarify the manner in which the Employee Relations Branch will maintain oversight of major investigations across the public service and ensure that investigations adhere to administrative fairness principles, best practices and PSA policies and procedures.

Definition of “Major” Investigations

An investigation will be treated as major where, if the allegations are substantiated, the discipline would likely result in a suspension of 6 days or more, a demotion or termination.

PSA Oversight Responsibilities

The PSA is responsible for overseeing the conduct of human resource investigations across the BC Public Service and monitoring whether administrative fairness and best practices are adhered to.

Oversight of major investigations

- All major investigations will have Terms of Reference and Investigation Plan, which will be approved by oversight representatives (see below) prior to the start of formal interviews.
- All major investigations will be overseen by a PSA Employee Relations Branch management representative and a ministry senior manager. Oversight members will:
 - Approve the investigation Terms of Reference and Investigations Plan;
 - Receive regular and periodic updates regarding the progress of the investigation;
 - Resolve issues that may arise during the course of the investigation, including issues related to the scope and focus of the investigation;
 - Approve any changes to the focus and scope of the investigation; and
 - Direct investigators to adhere to and sign off on having followed the *Investigations Best-practice Protocols Checklist* prior to the completion of the investigation.
- The lead PSA investigator will provide weekly updates to the Manager/Director of Investigations on the status of the investigation.
- The Manager/Director of Investigations will provide bi-weekly updates to the ADM, Employee Relations, on the status of all major/sensitive investigations.

Escalation

During the course of a major investigation the PSA investigator will promptly inform the Manager/Director of Employee Relations where a significant issue develops that threatens the integrity of the investigation*, including, but not limited to, anything that might result in the unreasonable delay in the investigation**.

The Manager/Director of Investigations will contact the Assistant Deputy Minister (ADM), Employee Relations, immediately if assistance is required in resolving issues as outlined above. The ADM will involve the Deputy Minister of the PSA as necessary and/or where a disagreement cannot be resolved at the ADM level.



Under the *Public Service Act*, the Deputy Minister of the PSA is responsible for the overall delivery of human resource services in the BC Public Service. In the event of a disagreement between the Ministry Deputy Minister and the Deputy Minister of the PSA, regarding a matter that the Deputy Minister of the PSA views as causing a threat to the integrity of an investigation, the Deputy Minister of the PSA will bring the matter to the attention of the Deputy Minister to the Premier for resolution.

PSA investigators and management representatives must track whether an employee has been suspended pending the outcome of the investigation and consider the suspension as a potential factor that should be included in any reporting that is carried out in accordance with this protocol.

Notes:

* Issues that could impact the integrity of investigation include, but are not limited to:

- The investigation is not conducted in accordance with the PSA Best Practice Protocols Checklist;
- The requirements of this protocol are not adhered to in the course of a major investigation;
- The investigation experiences unreasonable delay (definition below); and/or
- An investigator or oversight member has a conflict of interest or bias in relation to the investigation or its participants.

**** Unreasonable delay**

The employer is responsible for completing investigations without unreasonable delay in order to ensure that the rights of the respondent in an investigation are not prejudiced as a result of delays that are in the employer's control. Whether an investigation has experienced unreasonable delay must be assessed with a view to the specific circumstances of the investigation, including but not limited to, whether the employee was suspended pending the outcome of the investigation. All investigations, however, are expected to be conducted without unreasonable delay and an investigation of an employee that has been suspended is not generally expected to be conducted any faster than an investigation of an employee that has not been suspended.

Non-Major Investigations

The Employee Relations Branch within the PSA will be promptly notified of any information which comes to light during the course of a non-major investigation that could impact the assessment of whether the allegations qualify as "major."

Exceptions

Separate protocols have been drafted to apply to the Liquor Distribution Branch and the Adult Custody Division, Corrections BC.

Procedure for reporting employee misconduct in non-emergency situations to the police

1. Application and Definition of “Non-Emergency”

This procedure addresses the reporting, by government, of alleged employee misconduct in non-emergency situations to the police.

The *Standards of Conduct for Public Service Employees* requires employees to report any non-emergency situation, involving potential misconduct by an employee, that they believe contravenes the law, misuses public funds or assets, or represents a danger to public health and safety or a significant danger to the environment.

A “non-emergency” is a situation where a failure to report an allegation of employee misconduct to the police would NOT:

- Negatively impact the safety of the public or government employees;
- Provide an opportunity for the destruction of evidence that can only be obtained by the police and which, if secured, could support a criminal investigation; or
- Allow a matter that is criminal in nature to continue.

2. Responsibilities of Employees (other than Investigators)

An employee who believes they have information of employee misconduct, or misuse of public funds or assets, that may constitute criminal activity, should not contact the police unless it is an emergency. In a non-emergency situation that may involve criminal activity, the employee must seek advice from the appropriate investigation office within the provincial government, as set out in the table below.

| <i>Type</i> | <i>Employee responsibilities</i> | <i>Responsible IU</i> |
|--|---|-----------------------|
| Information incidents, including privacy breaches. | 1. Notify your supervisor 2. Call 250-387-7000 or 1-866-660-0811 and select option 3 | CIRMO |
| Financial improprieties. | 1. Notify your supervisor 2. Contact the Office of the Comptroller General | OCG |
| Technology or cybersecurity issue. | 1. Notify your supervisor 2. Call 250-387-7000 or 1-866-660-0811 and select option 3 | OCIO |
| All other alleged misconduct, or where it is unclear who to report to. | 1. Notify your supervisor 2. Contact the Public Service Agency (250-952-6000) | BCPSA |

If the alleged misconduct may fall under the responsibility of more than one investigative unit, report the incident to the PSA as per the bottom row in the table above.

If an employee is uncertain whether something constitutes an emergency, the employee should ask his or her supervisor.

3. Responsibilities of Investigators

Where an investigator becomes aware of alleged employee misconduct that may constitute a criminal or other offense in a non-emergency situation, they must notify their IU Branch Head (the Director or Executive Director, as the case may be) before taking any further action in relation to the matter.

4. Responsibilities of the Investigation Unit(s)

- i) Determine who has primary responsibility for making a recommendation regarding a report to the police.

Once an IU Branch Head becomes aware of alleged employee misconduct that may constitute a criminal or other offence through either of the methods above, he or she will arrange for an investigator to be assigned. If the alleged misconduct falls under the responsibility of a single IU, that IU will appoint an investigator to have primary responsibility to make the initial recommendation regarding a potential report to the police.

If the alleged misconduct falls under the responsibility of multiple IUs, the units will select one unit to take the lead in determining whether a non-emergent matter should be reported to the police. This determination will be made in accordance with the Public Service's *Investigation Protocol* that applies to multi-agency investigations. That unit will then appoint an investigator to have primarily responsibility to make an initial recommendation regarding a potential report to the police.

The investigator appointed under this procedure will usually be, but is not required to be, the lead investigator assigned to investigate the employee misconduct. Where the investigator appointed is not the lead investigator, the two will regularly provide each other with status updates, as appropriate.

- ii) Determine that the matter is within the scope of this procedure

The investigator appointed above must first confirm that the matter at issue is in fact, a non-emergency, and is therefore within scope.

If the investigator believes the matter qualifies as an emergency, or is otherwise out of scope, the investigator must consult his or her director for further instructions or direction.

- iii) Determine whether a recommendation to report to the police is appropriate

- a) At the outset of an investigation

A recommendation to report to the police can be made at any stage of an investigation, including at the initial stages of an investigation. A recommendation to report to the police at the initial stages of the investigation is designed to seek information to assist with a determination of whether an internal investigation should be conducted at this point, or be held in abeyance pending a possible police investigation. It may also assist to ensure authorities are provided with evidence that would be admissible at a potential future criminal trial, in cases where charges may be laid.

When assessing whether to recommend that a report to the police be made at a very early stage, the investigator should consider the factors set out in section (b), below, to the extent relevant information is available at the early stage. In addition to those factors, the investigator should consider factors such as:

- 1) Whether proceeding with an investigation at this time will potentially jeopardize an on-going police investigation; and
- 2) Are there questions about the potential admissibility of evidence gathered during the investigation at a potential future criminal trial (should charges be laid).

An investigator who believes one of the above factors may be relevant should contact the Legal Services Branch for advice before proceeding with either the recommendation to report or with the investigation.

b) At any other stage of an investigation

The investigator designated by his or her IU will gather relevant information needed to prepare an initial recommendation – including conducting the necessary enquiries, interviews and collecting or reviewing documentation.

The investigator should seek advice from the Legal Services Branch as required throughout the process.

While it is not possible to set out an exhaustive list of factors an investigator should consider when making his or her recommendation, relevant factors may include:

- a) The potential harm, if any, that may result from reporting the matter to the police at this time:
 - i. To the employee(s) involved in the alleged misconduct;
 - ii. The public service;
 - iii. To the potential victims, if any; and
 - iv. To the public interest.
- b) The potential harm, if any, in failing to report the matter to the police to:
 - i. The public interest;
 - ii. The public service;
 - iii. The potential victims, if any; and
 - iv. Government.
- c) Whether the alleged misconduct may have been authorized by supervisors or legislation;
- d) Whether there is credible evidence indicating a criminal offence has likely been committed (which may include consideration of whether there is evidence relating to most or all essential elements of the offence); and
- e) Whether there is potential evidence that the IU cannot obtain, but police may be able to (eg. through search warrants).

iv) Content of the Recommendation

The investigator should set out his or her recommendation in writing and discuss the recommendation with the IU Branch Head. The written recommendation should set out the recommendation and supportive reasoning, the factors considered, and the legal advice received. A copy of the actual legal advice received should be attached to the recommendation.

5. The Decision Making Process

i) If the Recommendation is Not to Report to the Police

If the investigator and an IU Branch Head agree the matter should not be reported to the police¹, the decision should be documented and briefing materials should be provided to the IU's ADM and DM, who will in turn advise the reporting ministry ADM and/or DM.

If other IUs are involved in investigating the employee misconduct, they must be advised of the decision not to report.

If the IU Branch Head does not agree with the investigator's recommendation, the IU Branch Head should prepare an accompanying document setting out why he or she disagrees with the recommendation. Both the recommendation and the accompanying document should be presented to the Government Decision Makers (defined below).

ii) If the Recommendation is to Report to the Police

If the investigator's recommendation is to report to the police, the investigator and his or her IU Branch Head should prepare briefing materials for the Government Decision Makers. If the IU Branch Head disagrees with the investigator's recommendation, the IU Branch Head should prepare an accompanying document setting out why he or she disagrees with the recommendation. Both the recommendation and accompanying document should be included in the briefing materials prepared for the Government Decision Makers.

iii) Providing Information to the Government Decision Makers

The Government Decision Makers are the Deputy Minister responsible for the IU, and the Deputy Minister for the ministry where the employee misconduct is alleged to have occurred.²

The Government Decision Makers should both be provided with briefing materials. The IU Branch Head is responsible for ensuring briefing materials are prepared and provided to the Government Decision Makers and is responsible for ensuring legal advice has been received.

iv) Role of the Government Decision Makers

Upon receiving the briefing materials, including the recommendation and legal advice, the Government Decision Makers must provide direction to the IU Branch Head of the IU. These directions may include:

- a) A requirement to obtain additional information before a decision can be made;
- b) Report the matter to the police; or
- c) The matter does not warrant being reported to the police.

¹ This decision may be revisited if additional, relevant information comes to light.

² Where the lead or sole IU involved is CIRMO, the Deputy Minister of the IU will only have an advisory role, with the ultimate decision resting with the Deputy Minister of the Ministry where the employee misconduct is alleged to have occurred.

The Government Decision Makers may consult the Deputy Attorney General if they have any questions, concerns or require further legal advice prior to making their decision.

Once a decision has been made, the Government Decision Makers should document their decision, and the rationale for the decision. This documentation, along with the briefing materials, should be retained as part of the investigative file.

If the Government Decision Makers cannot agree on whether to report, they will consult the Deputy Attorney General. If no consensus is reached after that consultation, they will bring the matter to the Head of the Public Service for resolution.

Once the IU Branch Head of the IU has received the Government Decision Makers' direction, he or she must notify any other IUs involved in the matter, and the investigator, as appropriate.

6. Reporting Alleged Misconduct to the Police

1) Determining what information can be disclosed to the Police

When direction is provided to report a matter to the police, the IU Branch Head of the responsible IU should seek legal advice from the Legal Services Branch, including lawyers with expertise in disclosure under the *Freedom of Information and Protection of Privacy Act* regarding what information can be provided to the police.

Once the IU Branch Head has received legal advice that the proposed information can be released to the police, the IU Branch Head will report the alleged misconduct to the police. The IU Branch Head may consult a representative of the Ministry of Public Safety and Solicitor General, Policing and Security Branch to seek direction as to the appropriate police agency to notify.

Following the initial report, the IU Branch Head must document the response of the police in the investigation file, including any recommendations of the police regarding internal government investigations and/or of their need for further information (e.g. a final investigative report). The IU Branch Head will also act as the liaison between the police and government, and will provide additional support and information as may be requested by police. Additional information should only be provided to the police after consultation with the Legal Services Branch.

In addition, the IU Branch Head will provide appropriate updates to his or her ministry executive, who will advise the reporting ministry executive, as appropriate. However, the IU Branch Head will not share any information that could negatively impact either a potential police investigation or an ongoing investigation.

7. Government Comment at the End of An Investigation

In the vast majority of circumstances, government policy will prevent any internal or external communication on investigations that potentially could have involved a report of alleged employee misconduct to the police. However, if the investigation is one where, due to exceptional circumstances, a potential referral to the police was communicated by government, government must consider, at the end of the investigation, whether it can communicate that the matter has now been closed.

The IU should consult with the Legal Services Branch to determine whether there is authority to disclose that the investigation has concluded, and if so, what information can be disclosed.

The IU should then prepare appropriate briefing materials for the Government Decision Makers, including the legal advice received from LSB. The Government Decision Makers will then decide what information will be disclosed regarding the investigation.

In making this decision, the Government Decision Makers will consider the following factors:

- a) The content and nature of any previous government communications on the matter;
- b) The impact on the privacy of impacted individuals of announcing the matter is now closed; and
- c) The amount of information that can be disclosed by law (e.g. is the information that can be disclosed so limited an announcement may fuel speculation instead of calm it).

8. Notification at the Conclusion of the Matter

When government is made aware that a matter referred to the police has been concluded, consideration should be given to whether individuals who were subject of a referral to police can be advised that the matter has concluded. In making this decision, the Government Decision Makers will consider the following factors:

- a) Whether the information can be disclosed by law, including but not limited to *FOIPPA*;
- b) Whether notification would interfere with a related investigation; and
- c) Whether the individual is aware of the referral (i.e. would it be more distressing to the individual to learn this information or not).



Interviews are the key evidence gathering tool of an investigation, and the evidence must be factual, complete and accurate. However, interviews do not need to be conducted in-person, and there are no legal requirements or entitlements for an in-person interview. In many cases, remote interviews are equivalent to in-person interviews.

Value of witness

- The value of the witness can be a factor in choosing between conducting an interview in-person or by video. In some cases, if a key witness is being interviewed it may be necessary to do the interview in person. However, there are circumstances in which it might still be appropriate to conduct a video-interview with witnesses that are pivotal to a case, including:
 - The case is of low complexity
 - The case is complex, but it is for a follow-up interview
 - The investigator has significant experience with video interviews and is confident that the interview can be done by video
 - A seasoned co-investigator will be present at the witnesses location

Complexity

- While it is commonly assumed that in-person interviews should be used for complex cases, it is often appropriate to conduct video interviews in these circumstances. Investigators are encouraged to conduct video interviews in complex cases where any of the following apply:
 - The witness is not integral to the case
 - It is for a follow-up interview
 - Good video technology is available for all parties
 - The investigator has significant experience with video interviews and is confident that the interview can be done by video
 - There are few, if any, documents to share and what documents that need to be shared can either be done by a co-investigator that is on site or electronically, if it appropriate to do so

Credibility

- An investigator can make assessments regarding an individual's credibility in a video interview. Factors that support conducting a video interview where credibility is a concern include:
 - The interview is a follow-up to a previous interview
 - A seasoned co-investigator will be present at the witnesses location and can assist with the determination of credibility
 - The case is routine
 - The interviewee is not a material witness

Cost/value

- Costs are a legitimate factor to consider in choosing what type of interview to conduct. Generally speaking, in-person interviews that require travel will cost more than video interviews where the technology is already in place. However, cost is not the only factor to consider. The primary consideration is ensuring that the type of interview conducted will allow the investigator to acquire the evidence necessary to form defensible findings and conclusions. Where a video interview would significantly risk compromising the investigation process it can be appropriate to opt for an in-person interview even though the costs would be greater.

Keep in mind that each investigation presents unique circumstances, and as always, consideration must be given to the impact on the workplace and employee's welfare. Remember that in-person interviews may result in broader workplace scrutiny, and the adverse effects may be mitigated or aggravated with the use of remote interviewing.

Human Resources Policy 11 - Discrimination and Harassment in the Workplace

Last updated November 21, 2017

This policy statement applies to all employees appointed under the Public Service Act and applies to incidents that occur at or away from the workplace during or outside working hours if a connection exists to the employment relationship. This policy statement supports the core policy objective of “promoting a safe and healthy workplace that supports the well-being of employees” and the objective that “public service employees exhibit the highest standards of conduct.”

As an employer, the Government of British Columbia, in cooperation with its unions and associations will promote a work environment that is free from discrimination and harassment where all employees are treated with respect and dignity. Discrimination and harassment as related to any of the prohibited grounds contained in the Human Rights Code violate the fundamental rights, dignity and integrity of an individual. Where discrimination or harassment is found to have occurred, the Employer may implement remedial action.

This policy statement promotes the prevention of discrimination and harassment and focuses on the prompt resolution of complaints. This policy statement does not prevent an employee from filing a complaint under Section 13 of the Human Rights Code; however, employees are not entitled to duplication of process. Where an employee directs a complaint of discrimination or sexual harassment to the British Columbia Human Rights Tribunal or where they are included as an element of a grievance, the complaint will not be pursued through the formal process specified in this policy or the applicable collective agreement. All information regarding a complaint is to be treated in the strictest confidence. Information that must be shared will be disclosed on a “need to know” basis.

This policy statement covers the following:

- discrimination and harassment for excluded employees;
- the complaint procedures for excluded employees; and
- the adjudication process for bargaining unit employees.

A provision regarding discrimination and harassment, including the complaint procedures for bargaining unit employees, is contained in each of the applicable collective agreements. If there is a conflict, the collective agreement will take precedence over this policy statement.

An employee who files a written complaint which would be seen by a reasonable person to be frivolous, vindictive or vexatious may be subject to disciplinary action.

Definitions

Discrimination

Discrimination relates to any of the prohibited grounds contained in the *Human Rights Code*. Prohibited conduct may be verbal, non verbal, physical, deliberate or unintended, unsolicited or unwelcome, as determined by a reasonable person. It may be one incident or a series of incidents depending on the context.

Employees have the right to employment without discrimination. Discrimination includes incidences of harassment because of race, colour, ancestry, place of origin, religion, family status, marital status, physical disability, mental disability, sex, age, sexual orientation, gender identity or expression, political belief or conviction of a criminal or summary conviction offence unrelated to their employment.

Sexual Harassment

Sexual harassment is a form of discrimination and is defined as any unwelcome comment or conduct of a sexual nature that may detrimentally affect the work environment or lead to adverse job related consequences for the victim of the harassment. Examples of sexual harassment include, but are not limited to:

- a person in authority asking an employee for sexual favours in return for being hired or receiving promotions or other employment benefits;
- sexual advances with actual or implied work related consequences;
- unwelcome remarks, questions, jokes or innuendo of a sexual nature including sexist comments or sexual invitations;
- verbal abuse, intimidation or threats of a sexual nature;
- leering, staring or making sexual gestures;
- display of pornographic or other sexual materials;
- offensive pictures, graffiti, cartoons or sayings;
- unwanted physical contact such as touching, patting, pinching or hugging; and
- physical assault of a sexual nature.

The definition of sexual harassment is not meant to inhibit interactions or relationships based on mutual consent or normal social contact between employees.

Complaint Procedures for Excluded Employees

These procedures will also apply if either the complainant or the respondent is a Deputy Minister. In such cases, the Deputy Minister to the Premier will assume the function of the Deputy Minister for the purpose of these procedures.

Informal Process

Employees who believe that they have a complaint of discrimination or sexual harassment may approach their supervisory personnel, association representative, or other contact person to discuss potential means of resolving the complaint and to request assistance in resolving the matter. A matter dealt with to the complainant's satisfaction is considered to be resolved.

Management Process

If the matter is not resolved to the complainant's satisfaction, or if the employee chooses not to proceed informally, the employee, within six months of the alleged occurrence, will approach the first level of excluded management not involved in the matter, for assistance in resolving the complaint. The manager will investigate the allegation and take steps to resolve the concern as appropriate within 30 days of the issue being raised by the employee. Employees may wish to have a representative present.

Formal Process

If the resolution proposed as a result of the management review is not acceptable, the complainant may refer the matter, in writing, to the Deputy Minister within 30 days of receiving the manager's written response or when the response was due. The complainant may seek assistance through their human resources personnel or association representative. The written complaint will specify the details of the allegation including:

- name, title and ministry of the respondent;
- a description of the action, conduct, events or circumstances involved in the complaint;
- the specific remedy sought to satisfy the complaint;
- dates of incidents;
- names of witnesses (if any); and
- prior attempts to resolve (if any).

The Deputy Minister will provide a copy of the complaint to the respondent. The Deputy Minister will acknowledge, in writing, receipt of the written complaint, have the matter investigated and take such steps as may be required to resolve the matter.

The employee and association representative, if applicable, will be advised in writing of the proposed resolution within 30 days from the date the Deputy Minister received the written complaint or a later mutually agreed upon date.

Adjudication Process – Bargaining Unit Employees

The following adjudication process is for complaints of discrimination or sexual harassment that have not been resolved using the process set out in the applicable collective agreement:

- BCGEU: Article 1.9
- PEA: Article 1.09
- Nurses: Article 1.06

Referral for Adjudication

When a complaint of discrimination or sexual harassment has not been resolved using the process set out in the collective agreement, the Bargaining Agent may refer the matter to the Employer for adjudication.

The written notice of referral for adjudication must be received by the Employer within 30 days of receipt of the proposal from the Deputy Minister to resolve the complaint made under the formal process for resolving discrimination and sexual harassment complaints. The 30-day period may be extended with the agreement of both the Bargaining Agent and the Employer.

Appointment of Adjudicator

The Employer will appoint an Adjudicator within 10 working days of receiving the written notice of referral for adjudication. The Adjudicator will either be appointed from a mutually agreed upon list, or will be someone who is agreeable to both the Employer and the Bargaining Agent.

Conduct of Adjudication

Adjudication will be conducted in a manner that ensures that those involved receive a fair hearing. The adjudication will be conducted in private, but the Employer has the right to full representation at the hearing.

All information about a complaint is to be treated in strictest confidence and is not to be disclosed to anyone except on a 'need-to-know' basis.

The Adjudicator will determine the adjudication process consistent with the principles of natural justice, and may admit any evidence that the Adjudicator feels is necessary or appropriate.

The Adjudicator may:

- Make findings of fact;
- Decide if, based on the facts, discrimination or sexual harassment has occurred;
- Attempt to mediate a resolution to the complaint; and
- Make recommendations regarding resolution of the complaint, which may include discipline.

The Adjudicator's written findings and recommendations will be forwarded as expeditiously as possible to the:

- Complainant;
- Respondent;
- Deputy Minister; and
- Bargaining Agent.

The Adjudicator's decision about whether discrimination or sexual harassment has occurred is binding on all parties.

Implementation of Recommendations

Pending the outcome of the adjudication process, the Deputy Minister may take interim measures to separate the employees involved. Any actions taken should not be seen as disciplinary or passing judgment on the validity of the complaint. Complainants will not be relocated without their consent.

Once the Adjudicator's report is received, the Deputy Minister will consider the findings and recommendations and determine what action should be taken. All parties will be notified of the action being taken within five working days of receiving the Adjudicator's written report.

Any action taken by the Employer, including discipline, that is consistent with the Adjudicator's findings of fact must be accepted by all parties and is not to be used as the basis for a grievance for bargaining unit staff.

If the Adjudicator determines that discrimination or sexual harassment has occurred, the Employer will document the personnel file of the respondent accordingly.

Responsibilities

Agency Head

- Provide timely advice to managers and employees respecting the application of this policy statement including direction that complaints and investigations be treated in confidence;
- Coordinate the development of awareness, training, and communication programs in support of this policy statement;
- Appoint an adjudicator to hear complaints of discrimination or harassment not resolved following a formal investigation;
- Establish a dispute resolution panel, when required; and
- Conduct formal investigations, when required.

Deputy Ministers

- Promote a work environment that is free of discrimination and harassment;
- Provide for employees attendance at discrimination and harassment awareness sessions;
- Provide employees information of the complaint process established by this policy statement;
- Ensure that complaints raised by ministry employees are investigated and addressed within the time frames established by the policy statement;
- Develop a system that enables all employees to be aware of their responsibilities relevant to this policy statement;
- Ensure that complaints are treated in confidence;
- Ensure that the number and grounds of complaints handled under the policy statement are tracked and reported as required;
- Ensure that resolutions are implemented; and
- Delegate authority and responsibility, where applicable, to apply this policy statement within their organization.

Excluded Managers

- Develop workplaces, for which they are responsible, free from discrimination and harassment;
- Inform all employees, for which they are responsible, of this policy statement;
- Investigate and resolve complaints within the time frames established by this policy statement;
- Report complaints that are investigated to the Deputy Minister;

- Treat complaints and investigations in confidence as appropriate; and
- Follow up on resolutions to ensure that they have been implemented and are working.

Employees

- Treat fellow employees with respect and dignity;
- Refrain from discrimination and harassment as defined by the policy statement;
- Ensure that complaints are treated in confidence; and
- Meet the time frames specified in this policy statement.

Investigation Best-Practice Protocols Checklist



This checklist must be completed and submitted at the conclusion of each human resources investigation.

Employee name: _____

Date: _____

1. Was the investigation conducted in an impartial manner by someone who is neutral?

YES ☐ NO ☐

Notes: _____

2. Was the investigation conducted objectively without having a pre-determined hypothesis or outcome in mind?

YES ☐ NO ☐

Notes: _____

3. Were respondents provided with the opportunity to have representation, e.g. a union shop steward, or an analogous representative for management respondents, during interviews?

YES ☐ NO ☐

Notes: _____

4. Were the parties and witnesses properly informed of their rights and responsibilities during the investigation process, including expectations surrounding confidentiality and retaliation?

YES ☐ NO ☐

Notes: _____

5. Was the respondent given sufficient details about the nature of the allegations prior to being asked to respond?

YES ☐ NO ☐

Notes: _____

6. Did the interviews include a sufficient level of open-ended questions to encourage full disclosure?

YES ☐ NO ☐

Notes: _____

7. Was the respondent given a full opportunity to respond to all allegations that could form the basis of disciplinary action?

YES ☐ NO ☐

Notes: _____

8. Did the investigator examine and assess all the relevant evidence that was uncovered or disclosed during the investigation, including potential alibis, alternate explanations, and/or mitigating circumstances?

YES ☐ NO ☐

Notes: _____

9. Were all relevant witnesses (as identified by the parties, other witnesses or the investigator) interviewed?

YES ☐ NO ☐

Notes: _____

Investigation Best-Practice Protocols Checklist



10. Was the investigation conducted without unreasonable delay considering the circumstances of the case? If the respondent was suspended pending the investigation, consider that in the analysis.

YES ☐ NO ☐ Was the employee suspended pending the investigation? YES ☐ NO ☐

Notes: _____

11. Based on all of the evidence, has the investigator determined that all or some of the allegations made against the respondent have been proven on a balance of probabilities (51% or greater)?

YES ☐ NO ☐

Notes: _____

The following individuals confirm, to the best of their knowledge, the above information to be accurate:

PSA/Lead Investigator

PSA Oversight Representative