

# SECC Employee Investigation Workflow

## Purpose

Provide a simple, consistent process for receiving and responding to employee complaints that may require an HR-led investigation.

## Complaints Requiring Quick, Immediate Attention

- Harassment (including sexual harassment)
- Discrimination
- Retaliation
- Hostile work environment allegations
- Safety concerns, threats, or violence
- Inappropriate conduct toward a minor (including boundary violations)
- Complaints involving a supervisor, manager, or other leader
- Ethics or code of conduct violations (example: fraud, theft, conflicts of interest)
- Serious policy violations that could create immediate risk (example: substance impairment at work, falsification of records)

## Guiding Principles

- Respond promptly and take timely, appropriate action.
- Stay neutral and focus on facts
- Apply the same standards and fairness to everyone involved
  - Use a consistent method to gather information (interviews, written statements, and core questions)
- Prohibit retaliation and communicate expectations clearly to all parties.
- Protect confidentiality as much as possible and share information only as needed
- Document key steps, decisions, and communications

# General Investigation Process

- The procedures outlined below are for guideline purposes only and may be changed or omitted by the SECC leadership without notice.
- Nothing contained here is intended to, nor should it be construed to limit or alter the at-will employment status of each employee.
- This workflow assumes the concern is reported directly by the employee raising it (the complainant). If concerns are raised by a third party or anonymously, HR will follow a similar process based on available information.

## 1. Complaint Received

- If received by an administrator or local supervisor, contact HR immediately for processing.
- If there is an immediate safety concern, take steps to ensure safety and contact HR right away.

## 2. Initial HR Contact

- HR connects with the complainant (by phone or in person) to understand the basics of the complaint.
- If investigation is warranted, HR will request a written report to be provided ASAP.

## 3. Immediate HR Considerations

- HR determines who will be part of investigation process
  - Determine role of legal counsel
  - Contact the Executive Secretary (church setting) or Superintendent (school setting) to coordinate who will participate in interviews.
  - Whenever possible, interviews will include at least two official SECC representatives (typically the HR Director and one additional SECC leader such as the Executive Secretary, Superintendent, Associate Superintendent, VP for Ethnic Ministries, or a principal, with legal counsel as appropriate)
- HR considers (in consultation with other SECC leadership) if immediate action is needed (example: administrative leave, temporary schedule or reporting changes, no-contact expectations).
  - As further information is gathered, HR will continually assess what action, if any, is required immediately.

#### **4. Collect and Interview: Complainant**

- HR receives written report from complainant and shares with members involved in interviews.
- Conduct an interview with the complainant to clarify details and identify potential next steps.
- Document expectations for the complainant during the investigation process and review with them.

#### **5. Collect and Interview: Witnesses (If Applicable)**

- If relevant witnesses are identified:
  - Request a written statement from each relevant witness (questions or prompts will be provided as needed).
  - Conduct witness interviews with HR and the same designated SECC leaders.
- Use of witnesses will be carefully determined to protect parties involved and reduce unnecessary impact to the local church or school.
- Follow up with letter of expectations of witness(es) during the investigation process.

#### **6. Collect and Interview: Responding Party**

- HR contacts the responding party to inform them of the allegations and provide appropriate detail so they can respond.
- HR requests a written statement responding to the allegations (providing questions or prompts as needed).
- Conduct an interview with the responding party (same group as above) after reviewing the written statement.
- Document expectations for responding party during the investigation process and review with responding party.

#### **7. HR Consult with Administration to Determine Actions and Outcomes**

- HR and Administration work together to decide next steps that are legally sound, consistent with SECC policy, and mindful of the local setting and relationships involved.

## 8. Disciplinary Options

- **Verbal warning:** HR partners with the supervisor to deliver a verbal warning and ensures a written record is kept of the date, attendees, and summary of the discussion.
- **Written warning:** The warning should describe the concern, required corrections, and the timeline for improvement. HR will ensure the employee has an opportunity to add comments. The employee's signature confirms receipt, not agreement. If the employee declines to sign, a witness may confirm that a copy was provided. HR will place the original in the official personnel file.
- **Required training (as applicable):** HR may require training or coaching as part of corrective action (example: anti-harassment training) and will document completion.
- **Follow-up review:** HR will support the follow-up process and should be informed if expected improvement has not been met, including completion of any required training. A written confirmation of the follow-up discussion and expectations should be provided to the employee, with a copy kept by HR for their personnel file.
- **Additional discipline:** If improvement is not achieved or the situation warrants a higher level of action, outcomes may include administrative leave (with or without pay), suspension, probation, or termination.
- **Termination consideration:** If termination is under consideration, HR will consult legal counsel and will not proceed with termination without legal review and guidance.
- **Grievance process (if challenged):** If an employee involved pursues a grievance, the matter will be heard by the Personnel Committee acting as the Grievance Committee, which will provide its recommendation to the Conference Executive Committee. The Executive Committee's evaluation and resolution of the problem will be considered final and binding.
- **Note on Certificated Teachers:** Termination and grievance procedures for certificated teachers are outlined in the Pacific Union Education Code and will be followed and processed by the SECC Education Board.

## 9. Follow-Up and Communication

- An HR representative should generally be present for follow-up conversations with any involved parties.
- HR ensures follow-up letters are sent to all involved parties as appropriate throughout the process.
- A written report summarizing the process, key facts, and findings will be provided at the conclusion of the investigation.