

MPS 22 – Investigations and Incident Management

****Category:**** Proof It Works

****Tags:**** incident investigation, misconduct, evidence preservation, incident management, escalation matrix, root cause analysis, compliance, loss event, security breach, procedural failure, HR investigations

****Description:**** Minimum Performance Standard for the structured management of investigations related to wrongdoing, control failures, or loss events. Ensures fair, documented, and lawful handling of incidents with full preservation of evidence and appropriate stakeholder notification. Supports risk reduction, organizational learning, and assurance requirements.

Assessment Criteria (Structured)

1. 1.

****Requirement:**** A formal Investigation Procedure must exist, be approved by senior management, and stored in the internal document management system.

****Evidence:**** Signed procedure document, DMS metadata, and approval records.

2. 2.

****Requirement:**** The procedure must include methods, evidence handling, reporting protocols, roles, and required documentation.

****Evidence:**** Procedure document sections and SOP cross-references.

3. 3.

****Requirement:**** Escalation protocols must define how and when serious incidents are escalated to senior management or external bodies.

****Evidence:**** Escalation matrix, internal communication records, and notification timelines.

4. 4.

****Requirement:**** Line managers must be responsible for timely notification to senior executives of significant events.

****Evidence:**** Email trails, meeting logs, and escalation documentation.

5. 5.

****Requirement:**** A centralized incident tracking system must be used to record all incidents.

****Evidence:**** Incident logs, database entries, and trend analysis outputs.

6. 6.

****Requirement:**** Recurring anomalies or losses must trigger escalation to executive leadership with assigned working groups.

****Evidence:**** Incident summaries and escalation correspondence.

7. 7.

****Requirement:**** The investigation process must apply to a wide range of incident types (fraud, asset loss, misconduct, etc.).

****Evidence:**** Scope section of procedure and case samples across incident types.

8. 8.

****Requirement:**** All investigations must be objective, documented, and preserve the chain of evidence.

****Evidence:**** Case files showing full documentation and chain of custody logs.

9. 9.

****Requirement:**** Final reports must be written and include improvement plans where applicable.

****Evidence:**** Sample reports, action plans, and CAPA trackers.

10. 10.

****Requirement:**** Formal strategy documents must be approved before complex or high-stakes investigations begin.

****Evidence:**** Strategy templates, approvals, and risk-based investigation records.

11. 11.

****Requirement:**** Authorization records must be retained within each case file.

****Evidence:**** Signed authorizations or investigator assignment records.

12. 12.

****Requirement:**** Conflict-of-interest controls must prevent named individuals from participating in investigations involving themselves.

****Evidence:**** Conflict-of-interest logs and procedure clauses.

13. 13.

****Requirement:**** Collaboration with law enforcement must be pre-approved by designated executives.

****Evidence:**** Authorization records, legal logs, and CRO/MD approvals.

14. 14.

****Requirement:**** Liaison with sector peers or enforcement bodies must be authorized and documented.

****Evidence:**** Memos, contact logs, and authorization files.

15. 15.

****Requirement:**** Environmental scanning (e.g., PESTEL or SWOT) must be performed at least every two years.

****Evidence:**** Scan reports, schedules, and leadership review summaries.