



# Pima County Community College District Administrative Procedure

<i>AP Title:</i>	<b>Information Technology Related Investigation Guidelines</b>
<i>AP Number:</i>	AP 9.01.07
<i>Adoption Date:</i>	11/13/06
<i>Schedule for Review &amp; Update:</i>	Every three years
<i>Review Date(s):</i>	5/27/11, 1/31/19
<i>Revision Date(s):</i>	5/27/11, 1/31/19
<i>Sponsoring Unit/Department:</i>	Information Technology
<i>Policy Title(s) &amp; No(s).:</i>	Information Technology Resource Management, BP 9.01
<i>Legal Reference:</i>	
<i>Cross Reference:</i>	Records Management, Retention and Disposition, BP 2.15, Records and Information Management, AP 2.15.01, Acceptable Use of Information Technology Resources, AP 9.01.01

## **PURPOSE**

This Administrative Procedure (AP) establishes the process required to investigate possible violation of all unethical behavior, alleged violations or potential violations of laws, regulations, PCC policy and procedure, Acceptable Use Agreement, or other standards.

## **SECTION 1: Definition**

- 1.1 An investigation is a systematic process of scrutinizing the activities of an individual or group due to a violation of College policies and procedures, Federal, State and local laws and the Acceptable Use Standards.

- 1.2 An investigation may include, but is not limited to, retrieving files, documenting Internet activities, and monitoring technology-related activities.
- 1.3 An investigation does not include the normal monitoring of Information Technology resources to ensure adequate, secure and consistent delivery of college resources.
- 1.4 Retrieval of records for audit purposes is not subject to this administrative procedure. Refer to AP 7.01.01 for further information regarding the scope and authority of Internal Audit.

## **SECTION 2: Approval Process**

An investigation will only proceed upon written approval from one of the following: General Counsel, Lead Investigator for Office of Dispute Resolution, IT Security Group (Violations of Acceptable Use for Technology Resources), Chief of Police (Restricted to law enforcement purposes only) or their designees.

## **SECTION 3: Compliance**

- 3.1 If in the course of managing the computing and networking environment an Information Technology employee discovers inappropriate use of the resources other than a security breach, he/she should report that to his/her supervisor.
- 3.2 If, in the course of managing the technology environment, an Information Technology employee discovers security breaches, action may be taken immediately to protect the environment.
- 3.3 Investigations regarding Information Technology resources will be coordinated by the Director of Records and Information Assurance.
- 3.4 When appropriate, investigations can be contracted to an outside resource.

## **SECTION 4: Investigation Process**

A limited set of employees within the Office of General Counsel, Information Technology, Human Resources, Campus Police, and Office of Dispute Resolution

will be granted direct access to conduct electronic record searches. Ongoing investigations are confidential in nature, and all reasonable steps will be taken to protect College interests, to respect the rights of its employees, and to respect the confidentiality of information involved. Pima Community College reserves the right to disclose information learned in investigations as appropriate or necessary to protect Pima Community College interests, seek advice, counsel or assistance from third parties in connection with the investigation, and/or to comply with applicable laws or regulations.

All employees, including all levels of management, must cooperate fully with and provide appropriate assistance to ongoing investigations, and must maintain the confidentiality of investigations.

Investigations will be conducted as expeditiously as possible, without jeopardizing the integrity of the investigation.

- 4.1 Requestor(s) as defined in Section 2 send email to it-records-request@pima.edu.
- 4.2 Request is reviewed by Chief Human Resource Officer, General Counsel, Lead Investigator, Chief of Police, or College Records Officer
- 4.3 The assigned investigator shall determine facts and gather sufficient evidence to allow Human Resources and appropriate decision maker to take follow-up action to resolve the issue(s).