



# Pima County Community College District Administrative Procedure

<i>AP Title:</i>	<b>Information Technology Related Investigation Guidelines</b>
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<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 unethical behavior or alleged violations of applicable laws, regulations, or (“College”) policies procedures, or other published standards such as the Information Technology (“IT”) Acceptable Use Agreement.

## **SECTION 1: Definition**

- 1.1 For purposes of this AP, An investigation (“Investigation”) is a systematic process for reviewing the IT-related activities of one or more individuals or groups to determine if a violation of College policies, procedures, or

published standards; Federal, State, or local laws; or the College's Acceptable Use Agreement for IT recourses has occurred.

- 1.2 An Investigation may include, but is not limited to, retrieving and reviewing electronic files, emails, chats, and telephone records; documenting Internet activities, and monitoring any technology-related activities.
- 1.3 An Investigation, for purposes of this AP, does not include the normal, routine-monitoring of the College's IT resources conducted regularly to ensure adequate, secure, and consistent delivery.
- 1.4 Retrieval of records for audit purposes is not subject to this AP. Refer to AP 7.01.01 for further information regarding the scope and authority of Internal Audit.

## **SECTION 2: Approval Required**

An Investigation conducted pursuant to this AP will only proceed upon written approval from one of the following: Office of the General Counsel, Office of Dispute Resolution ("ODR"), IT Security Group (for suspected violations of the College's Acceptable Use for Technology Resources), Chief of Police (for law enforcement purposes only), or their respective designees. (See Section 4 below).

## **SECTION 3: Compliance**

- 3.1 If College IT employees discover suspected inappropriate use of College IT resources other than a security breach (see 3.2 below), they should report the suspected inappropriate use to their respective supervisors.
- 3.2 If a College IT employee discovers a suspected security breach, the IT employee may take immediate action necessary to protect the College's IT resources and should report the suspected breach to their supervisor as soon thereafter as possible.
- 3.3 Investigations regarding College IT resources will be coordinated by the Director of Security, Chief Information Security Officer.
- 3.4 When appropriate, investigations can be contracted to third-party resources outside the College.

**SECTION 4: Investigation Process**

- 4.1 Requests for Investigations must be submitted via email to it-records-request@pima.edu.
- 4.2 Requests for Investigations shall be reviewed for approval by the College's Chief Human Resource Officer, General Counsel, ODR Investigator, Chief of Police, or College Records Officer. (See Section 2 above).
- 4.3 If an Investigation is approved, an appropriate investigator shall be assigned to gather sufficient facts and information necessary to assist Human Resources or other appropriate decision-maker to determine, in accordance with applicable College policies and procedures, if a violation has occurred and, if so, what responsive action should be taken.
- 4.4 A limited number 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 searches of the College's electronic records.
- 4.5 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. The College reserves the right to disclose information learned during Investigations as appropriate or necessary to protect the College's interests; seek advice, counsel, or assistance from third parties in connection with the Investigation, and/or to comply with applicable laws or regulations.
- 4.6 All employees, including all levels of management and senior administration, must cooperate fully with and provide appropriate assistance to ongoing investigations, and must maintain the confidentiality of investigations.
- 4.7 Investigations will be conducted as expeditiously as possible, without jeopardizing the integrity of the investigation.