

When several cases tell the same story

Two cases may be a coincidence.
The third changes the question.

Connect without conflating.
Understand what repeats without manufacturing certainty.

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8:47 a.m. The third case does more than add another fact. It changes the scale of the analysis.

A new report arrives from a subsidiary the team knows little about. A control manager says she refused to approve a procedural exception ahead of the quarter-end close. She says she was told: 'we'll regularise it afterwards'. Her case contains two messages, a short timeline and the name of a regional director. Read on its own, the account raises familiar questions: which rule applied, what exception existed, who could authorise it, and what consequences does the reporting person fear now?

Yet the wording catches an investigator's attention. Eleven months earlier, in another entity, a closed case had concerned a request to accelerate a payment. The phrase 'we'll regularise it afterwards' had already appeared in an email. The investigation had not established fraud; it had identified a poorly documented workflow and confusion between commercial urgency and authority to execute. Five months later, a second case had concerned the removal of an assignment after a comparable exception was refused. The facts and the people were not the same. The same regional director, however, appeared in the decision path.

Two cases could still be read as separate situations sharing a common vocabulary. The third does not turn that proximity into proof. It changes the question: is there a recurring mechanism that deserves to be examined beyond each individual case? Does the repetition concern a person, a management practice, a control weakness, a closing period, or simply the language the organisation uses around urgent situations?

That new question immediately creates several risks. Reopening earlier cases may reveal identities to people who had no access to them. Merging the accounts may give the third reporting person information they had never known and contaminate a future interview. Searching every report for the director's name may build a profile from mentions that are, in some cases, purely functional. Conversely, keeping each case in a sealed box may prevent the organisation from seeing a repetition that changes its understanding of the risk.

Cross-case analysis sits in that space. It is neither the accumulation of allegations nor the refusal to look for relationships in the name of investigative independence. Its purpose is to make a relationship examinable: what repeats, what differs, what may share a common origin, and what must remain separate until a verification justifies going further.

The professional must therefore work at two levels at once. Each case keeps its own facts, sources, access rights and conclusions. A cross-case view may reveal a new investigative need: test the independence of sources, compare decision paths, widen a mandate, protect another person or examine an organisational risk. The two levels inform one another without becoming the same thing.

The third case does not prove that the first two were telling the same story. It requires us to ask whether they should now be read together.

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CHAPTER 01

When a case stops standing alone

Cross-case analysis begins when a possible relationship could change an investigative decision. A visible repetition is only a working signal; it becomes useful when we can say what new question it opens.

A recurrence is not yet a mechanism

Three reports may name the same person for very different reasons. A regional director may appear in many cases because they approve budgets, take part in promotion decisions and arbitrate exceptions. Their statistical presence is therefore partly produced by their role. It deserves to be understood; it cannot, by itself, be read as evidence of conduct.

The same caution applies to a supplier, a department or a phrase. A dominant provider may appear in several incidents without those incidents sharing an origin. 'Client urgency' may simply be common organisational language. Repetition becomes informative when it combines with other elements: the same type of exception, the same approval sequence, the same period, the same route around a control, or the same professional consequence.

The first task is therefore to describe the relationship without giving it more significance than it has. 'Three cases mention the same director' does not mean 'three cases describe the same behaviour'. 'Two payments followed an approval outside the usual workflow' does not yet establish that the same mechanism explains them. The wording of the connection must be precise enough to verify and limited enough not to become an additional allegation.

Ask what the third case actually changes

In the opening scene, the new case may change several decisions. It may justify checking whether the exception invoked belongs to a common process. It may lead the team to examine whether the two earlier cases had already documented that process. It may also require a fresh look at the independence of a decision-maker who had previously been considered outside the facts under investigation.

A connection matters only if it changes something concrete: a hypothesis to test, a source to seek, a mandate to widen, a protective measure to reconsider, or an organisational risk to address. If it produces only a sense of familiarity, it should remain an observation rather than becoming a new category in the case.

This discipline also protects against hindsight bias. Once a third case appears consistent with the first two, it is tempting to read earlier areas of uncertainty as though they had always pointed to the same conclusion. Yet earlier decisions were made on the information available at the time. A new connection may justify a fresh reading; it does not retrospectively turn the unknown into the known.

A simple framework for qualifying the signal

Three repetitions, three different questions

Initial observation	What it may justify	What it does not establish
Same person mentioned	Check their role, the nature of the mentions and the decisions in which they were involved.	Recurring conduct or shared responsibility.
Same exception sequence	Compare the steps, authorisations and periods concerned.	That the exception was improper in every case.
Same expression or wording	Look for a common origin: template, instruction, team vocabulary or shared source.	The independence of the accounts or the identity of their author.

A connection is a trigger for verification. Its strength depends on context and on the independence of the elements that make it up.

Numbers do not replace materiality

The number three naturally draws attention, but it is not a universal threshold. Two well-documented cases may be enough to justify cross-case analysis. Ten vague mentions derived from the same source may carry less information. A number becomes useful only when considered alongside the quality, independence and nature of the underlying material.

In the field of discrimination and sexual harassment, Framework Decision 2025-019 of the French Defender of Rights stresses the need for rigorous, objective and confidential investigation and refers, in that specific field, to a body of converging indicators. That reference should not be transplanted mechanically into every case; it nevertheless shows why several elements gain meaning through their relationship, not through simple addition. [1]

For internal anti-corruption investigations, the AFA and the French National Financial Prosecutor's Office (PNF) likewise emphasise structured work capable of establishing facts and drawing appropriate consequences from them. Here too, a connection has value only if it can be tied to an investigative purpose and to intelligible investigative steps. [2]

A case stops standing alone when its relationship with another case becomes an investigative question - not when a search engine finds the same name.

That shift requires the nature of the relationship to be made explicit. Two cases may resemble one another without depending on one another; they may also share a source, a document, a procedure or a version of the same account. Distinguishing these possibilities is what makes cross-case analysis usable.

CHAPTER 02

Connect cases without inventing a shared story

Similarity is a weak property. To become useful, it must be broken down: what exactly is shared, where does that proximity come from, and what verification could confirm or reduce its significance?

Different families of connections answer different questions

A factual connection concerns the same event, object or transaction. A temporal connection concerns a sequence or an incompatibility of dates. A numerical connection may involve amounts, identifiers or thresholds. A relational connection links actors, roles or decision paths. A documentary connection compares a version, signature, provenance or transformation.

Other relationships arise from the investigation itself: a statement against a document, two statements about the same object, changes in one person's account, a chronological incompatibility or a significant omission. Each calls for its own treatment. A difference in amount does not mean the same thing as a changed account; the absence of something from a document does not have the same status as an expressly denied fact.

Working language should make the nature of the relationship visible. Writing only 'cases linked' erases too much. 'Same supplier, two entities, different periods, bank-account verification undocumented in both cases' already gives the professional something concrete to discuss without claiming that the causes are common.

A common source can look like several confirmations

Three people repeat the same assertion. That may mean they observed the same behaviour. It may also mean they read the same message, attended the same meeting or heard the account from one person. Semantic similarity can identify the closeness of their wording; the investigation must still reconstruct how each person came to know what they describe.

The risk is particularly acute when cases have already crossed paths. An employee may have learned of an earlier case. A staff representative may support several people. A previous investigation may have circulated wording that later reappears. That circulation does not invalidate later testimony, but it changes what it contributes as an independent source.

A sound analysis therefore separates agreement between accounts from their independence. Two matching descriptions based on two separate observations do not provide the same information as two repetitions of one shared account. The lineage of the narrative becomes an investigative object in its own right.

A contradiction must concern the same object

Connected cases often reveal differences. One person says that no exception was possible; another case contains a note providing for a derogation. The difference is real, but it becomes a contradiction only after the date, scope and authority of the note have been checked. A later rule does not contradict what someone could have known six months earlier.

The same requirement applies to timelines. Two cases may place what appears to be the same meeting on different dates because one refers to the preparation meeting and the other to final approval. A useful incompatibility requires the same event to have been identified. Assistance may flag the discrepancy; the professional must decide whether the objects are genuinely comparable.

This care prevents contradiction inflation. A rich case will inevitably contain different wording, approximations and points of view. Treating them as anomalies merely because they are not identical diverts attention from the differences that actually change understanding.

An omission exists only in relation to what could reasonably have been expected

The absence of a name, step or incident from a case may matter. But first there must be a reason why that information should have appeared there. A witness interviewed about the preparation of a payment does not necessarily omit an HR discussion they were never asked about. A summary report for the audit committee will not contain the same level of detail as an interview record.

A significant omission is therefore established by comparison with an obligation, a question asked, a declared scope or an earlier version. It is not simply the result of a search that failed to find a word. This distinction is essential when several cases are compared: what is missing from one may be outside scope rather than concealed.

What a map shows - and what it does not

A map linking cases, people, companies, documents and events can make a structure immediately visible. It becomes dangerous when visual density is mistaken for causal importance. A person responsible for centralising approvals will naturally be highly connected. A decisive actor may, by contrast, appear only once.

Connections should therefore retain both their nature and their origin: mentioned by, recipient of, signed by, present at, same identifier, same document, reported relationship, verified relationship. An unlabelled line creates an intuition; a qualified relationship creates a verifiable question.

Good cross-case analysis preserves the differences between cases just as carefully as what they have in common.

This discipline prepares the most delicate comparison of all: context. The same apparent fact can change meaning depending on role, period, volume of activity or the rules in force.

CHAPTER 03

Compare without stripping away context

A recurrence can be interpreted only in light of what makes the situations comparable. Context prevents frequency, exposure and behaviour from being mistaken for one another.

Frequency must be read against exposure

A manager named in four cases out of five may appear more exposed than another named in four out of fifty. But even that ratio is not enough: the two roles may not deal with the same situations, hold the same authority or be subject to the same reporting channels. The denominator matters as much as the numerator.

The same logic applies to a process. Three incidents in a workflow used ten times a year do not carry the same meaning as three deviations among several hundred thousand transactions. That does not automatically make the first three more serious; it shows that raw frequency is not enough to define risk.

An investigation does not always need a complete statistical analysis. It should at least make visible the exposure that may explain a repetition. A central approver, sole supplier or support function will often be mentioned. Functional centrality must be distinguished from problematic centrality.

Organisations change between cases

A connection between 2024 and 2026 may cross several versions of a procedure, a reorganisation, a software change or a transfer of responsibilities. Saying that ‘the same control was bypassed’ requires checking that a comparable control existed at both dates. The history of the framework is part of the comparison.

Roles change too. A person named as a manager in the first case may have become a regional approver by the third. The same name no longer represents the same authority. Conversely, two different people may successively occupy a function whose design explains the recurrence. The useful link may then be the role rather than the individual.

This distinction is especially important for corrective action. If the problem lies in a poorly designed role, replacing a person without changing the workflow may leave the mechanism intact. If the problem lies in individual conduct, a purely procedural response may miss the issue. Cross-case analysis must remain capable of supporting more than one explanation.

The same words may come from the same culture, not the same event

Identical expressions may point to a shared practice. They may also come from a template, professional jargon or training. ‘We’ll regularise it afterwards’ may be wording genuinely passed on by a manager; it may also summarise a habit familiar across several teams. Tracing its origin is more informative than counting occurrences.

It can be useful to identify the earliest known occurrence, the channels through which the phrase circulated and the people exposed to it. That work can distinguish an independent account from shared

language. It may also reveal an organisational issue: an informal instruction that spread without ever becoming an official rule.

Compare conclusions without turning them into facts

A closed case may contain a conclusion: facts not established, procedural anomaly, conflict not characterised, control recommendation. That conclusion is the outcome of a particular piece of work at a particular time. When a new case appears, it should neither be ignored nor treated as raw evidence equivalent to a source document.

The professional should be able to return to the material that supported that conclusion. 'No fraud established' may mean that the checks found a regular explanation; it may also mean that the available information did not allow several mechanisms to be distinguished. A new case has a different effect in those two situations.

This approach protects older cases from being rewritten. A new recurrence may justify looking differently at an issue that remained open, but not silently changing the meaning of the earlier report. A reopening note should distinguish what was concluded, what remained uncertain and what now justifies a fresh examination.

A suggested connection is not a decision

A tool can help retrieve common names, amounts, dates, wording or relationships. That capability is useful precisely because it extends working memory. It does not give the similarity it produces the status of a new fact. The professional must be able to understand why the connection was suggested and return to the cases concerned.

The more a suggestion concerns people, the more important that requirement becomes. An opaque 'risk' or 'proximity' score may accumulate contextual effects that have no common meaning. A readable list of reasons - same role, same process, same period, same supplier - instead allows a professional to decide whether the connection deserves verification.

The GDPR requires, among other things, purpose limitation, data minimisation, accuracy and security, together with specific conditions for certain categories of data and certain types of processing. The technical ability to cross-reference cases is therefore not, by itself, a purpose or a lawful basis for use. [3]

Context does not slow cross-case analysis down. It prevents a visible repetition from becoming an explanation too soon.

Once the relationship has been described with enough precision, the investigation must decide what to do with it. A connection gains value when it leads to an investigative step whose purpose, scope and possible outcomes are explicit.

CHAPTER 04

Turn a connection into an investigative step

The right outcome of cross-case analysis is not 'these cases are linked'. It is a new question for which we can explain why verification is worthwhile and what each possible answer would change.

Frame the question before widening the scope

In the opening scene, the presence of the same director and the same phrase may lead to a focused question: did the three situations rely on the same exception mechanism, under comparable conditions and through a common authorisation chain? That is more useful than 'check the director's other cases'. It defines an object that can produce several possible answers.

The scope can then be defined by period, process and roles. Earlier cases are consulted only to the extent necessary to answer that question. If no common mechanism appears, the connection can be reduced. If one does appear, the investigation has an explicit reason to examine more deeply how the instruction travelled, which controls applied and which decisions were made.

This avoids investigation by accumulation. Opening every case that contains the same name quickly creates a volume that is difficult to justify. Examining how an identified exception mechanism works confines the analysis to what may genuinely explain the recurrence.

Test independence before adding accounts together

When several people report similar facts, one of the first useful steps may be to understand how they came to know what they describe. Did they speak to one another? Did they see the same document? Is one supporting the other? Did they observe separate events? The purpose is not to diminish anyone's account; it is to clarify what each account contributes.

Independence may be partial. Two people may have discussed a general pattern while each experiencing a separate event. The investigation should then separate shared material from individual observations. A binary label - independent witnesses or not - would be too crude.

The same caution applies to documents. Three cases may contain the same document filed under three different names. It does not become three sources. Its three transmissions, however, may document three moments in the circulation of information. Cross-case analysis must be able to change the object of the inquiry without losing that distinction.

Choose a step that can also weaken the hypothesis

A good verification does not merely seek to confirm the suspected mechanism. It must also be capable of showing that the situations were different. Comparing procedure versions may reveal that the exception in the first case was authorised while the one in the third was not. Reviewing diaries may show that the same people never took part in the two decisions thought to be connected.

The ability to weaken a connection is a quality criterion. A search designed only to find more occurrences of a name or phrase will mechanically strengthen the impression of recurrence. A search that also

examines counter-examples, periods without incidents and differences in roles produces more robust information.

Within its field, the French Defender of Rights stresses objectivity and rigour in investigations. The AFA and PNF likewise emphasise the structure of the mandate, investigative steps and reporting. These requirements point to the same working discipline: an investigative step should be capable of illuminating the question, not merely illustrating the preferred hypothesis. [1] [2]

From a connection to a useful investigative step

A connection becomes useful when it opens a verification

Observed connection	Possible targeted step	What the step should help distinguish
Same person in three decisions	Reconstruct their roles and authority at each date.	Functional presence, actual authority and effective involvement.
Same exception across several entities	Compare rules, approval logs and documented reasons.	Permitted derogation, informal practice or a bypass that needs explanation.
Very similar accounts	Reconstruct how each source came to know the information and any exchanges between them.	Independent observations, a shared account, or a combination of both.

Examples of reasoning, not an automatic list of steps. The mandate, access rights and applicable rules must still be assessed in each situation.

Merging cases is only one option

A strong relationship does not necessarily require administrative merger. Cases can keep their own owners, reporting persons and access rules while being connected through a separate cross-case analysis. This can protect identities and prevent permissions granted in one case from automatically spreading to others.

In other situations, a common mandate may become necessary: the same transaction, the same actors, the same evidence, the same work to be carried out. The decision should then state what is being combined - the investigation, the timeline, preservation or reporting - and what remains separate. The word 'case' covers several functions that are better kept distinct.

The transfer must also preserve history. An older case linked to a new investigation should not lose its original closed status. It may be reopened or used as a source within a new mandate, with a dated decision and an explicit reason. That traceability explains why the organisation changed the scale of its work.

Cross-case analysis has done its job when it produces an investigative step whose usefulness remains intelligible even if the original connection is ultimately rejected.

That requirement for usefulness meets another limit: accessing several cases mechanically increases the amount of sensitive information brought into relation. Cross-case analysis therefore needs safeguards of its own rather than merely inheriting those of each case taken separately.

CHAPTER 05

Protect cases from cross-contamination

Linking cases creates a new flow of information. Confidentiality, minimisation and the independence of sources must be designed at the level of the cross-case analysis itself.

The right to read one case does not automatically open the others

An investigator authorised on the third report does not necessarily have access to the identities and evidence in the first two. Even learning that an earlier case exists may itself reveal sensitive information. Access architecture should therefore distinguish the right to see that a relationship exists, the right to understand why, and the right to open the sources that make it up.

That gradation enables different forms of work. A person may be told that a comparable mechanism has already been examined without learning who made the first report. An authorised decision-maker may, by contrast, access the full comparison in order to decide whether a cross-case mandate is needed. Need-to-know should be built around the decision to be made, not around the curiosity created by the connection.

The EU Whistleblower Protection Directive strictly protects the confidentiality of reporting persons' identities and information from which they may be identified. It also requires personal data that are manifestly irrelevant to the handling of a report not to be collected or, if collected accidentally, to be deleted without undue delay. [4]

Minimise the connection, not only each individual case

The GDPR requires purpose limitation and data minimisation. When an organisation creates a cross-case capability, it should be able to explain what that capability is for and which categories of information are necessary. A function that can technically compare 'everything with everything' does not mean every comparison should be permitted. [3]

Within its scope, the CNIL framework for professional whistleblowing systems reiterates requirements relating to purpose, retention, security and authorised users. A cross-case analysis that reuses information from reports must therefore remain tied to a compatible objective and to justified access. [5]

The European Data Protection Board's guidelines on data protection by design and by default emphasise, among other things, access limitation, relevance, necessity, aggregation and pseudonymisation where possible. These principles are especially useful when designing a cross-case view that does not systematically expose the underlying source cases. [6]

Do not contaminate interviews

Cross-case analysis may change how an interview is prepared. It should not lead to the premature disclosure of other people's accounts. Saying 'two other people told us the same thing' may influence an answer, reveal the existence of other cases and make their reporting persons identifiable.

A question can be prepared from a cross-case pattern without disclosing where the pattern came from. 'How were exceptions decided during the close?' can help explain a process. Showing a document or passage later may be necessary, but it should serve a defined purpose and preserve the chronology of what the person knew before seeing it.

The same separation protects people who are the subject of allegations. An earlier allegation should not be presented as an established fact simply because a new case exists. If it is relevant to a question, its status should remain visible: report, verified element, earlier conclusion or issue left open.

Preserve the ability to correct a false connection

An identity error may connect two people with the same name. A company may have changed its legal name. An identifier may have been reused in an older system. A date extracted from a document may be the date it was generated rather than the date of the event. A connection should preserve the attributes that justified it and the ability to remove it.

That ability to correct matters because errors can cascade. If a false connection has fed a map, a summary and a scope decision, correcting it should reveal those downstream uses. Silently deleting a line from a map is not enough; the team needs to know which analyses depended on it.

Accuracy, access limitation and traceability are not external constraints on reasoning. They are what allow a connection to remain revisable, which is essential when people and sensitive situations are involved.

Keep separate what needs to remain separate

A cross-case view can use pseudonymised identifiers to compare processes or periods without immediately displaying identities. A risk summary may state 'three cases across two entities involving the same exception workflow' without reproducing every account. When identity becomes necessary to a decision, access can be opened to authorised people.

This arrangement does not prevent demanding investigations. It prevents the need to compare from becoming general disclosure. It also allows cross-case access to be closed once the question has been resolved without changing the permissions that belong to each source case.

Confidentiality does not mean preventing connections. It means ensuring that each connection opens only the information needed for the decision it is meant to inform.

Once those safeguards are in place, the perspective can widen again: some connections say more than something about the people named. They reveal a weakness in process, culture or governance that calls for an organisational response.

CHAPTER 06

Move from individual cases to organisational risk

Several cases may reveal the same risk environment without sharing a single perpetrator. Prevention starts when the organisation can distinguish individual responsibility from a mechanism that makes deviations more likely.

A repetition of outcomes may reveal the same weakness

Suppose three different cases concern payments that were substantively authorised but poorly documented at the point of execution. The actors are different. The suppliers are different. The recurrence may nevertheless reveal a common weakness: an ambiguous intermediate status in the system or an exception process that leaves too little trace.

Organisational risk does not replace individual examination. One person may have exploited a weakness deliberately, another may have followed a local practice and a third may simply have made an error. Fixing the tool or the procedure may be necessary in all three cases without requiring the same assessment of individual conduct.

That separation means the organisation need not wait for every question of individual responsibility to be resolved before improving a control. It also avoids the opposite mistake: concluding that a weak process means no one could have acted improperly. The two levels answer different questions.

Do not create a personal risk score

The temptation to industrialise case linking can lead to ranking people by the number of cases, mentions or connections associated with them. Such scores are particularly misleading in organisations where certain functions are naturally central. They can also give a quantitative appearance to information whose quality and status are highly heterogeneous.

A person named as decision-maker, witness, recipient or adviser cannot sensibly receive the same weight in each role. A disproved mention should not remain equivalent to a verified observation. A case closed as out of scope does not have the same status as an investigation that established a fact. Aggregating these elements without preserving their nature creates a measure that looks objective because it is numerical.

Where a cross-case indicator is useful, it is better focused on phenomena: numbers of undocumented exceptions, processing delays, recurring control weaknesses, affected entities, types of process. People do not disappear from investigations; they simply stop being reduced to a score that confuses exposure with behaviour.

Describe the mechanism before proposing the remedy

An organisational recommendation should be tied to what the cases actually showed. 'Strengthen the compliance culture' is too general if the three cases mainly revealed poor logging of exceptions. 'Train managers' may be inadequate if the rules themselves are contradictory.

Cross-case analysis can frame a mechanism: commercial urgency creates an exception; the exception is authorised orally; the status in the system does not distinguish preparation from execution; regularisation happens afterwards; the control is difficult to reconstruct. Each step can then be matched with an appropriate measure and a way to test whether it works.

The value of this formulation is that it can be discussed without waiting for a global verdict on every person involved. It also makes it possible to identify which parts should be removed from the recommendation if they are not confirmed. The action plan remains connected to the cases without becoming a disciplinary summary of them.

Aggregated information must keep its limits visible

A board or committee may need to know that several cases converge on a common weakness. That information can be provided without exposing identities or details that are unnecessary to the decision. But aggregation must not turn signals of different status into certainty.

A useful formulation distinguishes established findings from what remains exploratory: ‘three separate cases led to examination of the same exception workflow; two confirmed an absence of traceability, while the third is still in progress’. The reader can see both the recurrence and its limit.

Within the internal procedures it governs, the French Decree of 3 October 2022 requires designated persons or departments to have, among other things, sufficient competence, authority and resources, and requires reports received outside the designated channel to be forwarded without delay to the competent people. This is a reminder that the organisation of handling matters as much as the ability to detect relationships. [7]

Measure the remedy through the cases that follow

An organisational recurrence does not disappear because a procedure has been rewritten. Later cases become a source of verification: is the exception now documented? Do users understand the status? Can decisions be traced without reconstructing an informal chain?

Monitoring can rely on limited, aggregated information. The aim is not to keep every case indefinitely in order to prove that the risk has disappeared. It is to define indicators compatible with processing purposes and retention periods, then reassess the measure as the context changes.

When several cases tell the story of the same weakness, the useful response may be collective even though individual responsibility is not.

The final task is to organise memory. A connection may emerge months after a case has been closed. The organisation needs to recover what mattered at the time, integrate the new relationship and preserve the ability to revisit an interpretation that has become less convincing.

CHAPTER 07

Build a memory that can challenge itself

Cross-case memory has value only if it preserves the date, source and status of what it connects. It should make it possible to recover a recurrence, but also to remove a link that turns out to be false or revise a hypothesis.

Keep the connection together with its reason

A link between two cases should answer a simple question: why was it created? Same person, same identifier, same process, same document, same sequence, same expression or professional decision? That reason allows the next investigator to assess the link without repeating the entire search.

It also allows relationships to be ranked. An exactly matching bank identifier does not have the same status as similar vocabulary. A relationship confirmed by several attributes is more robust than a near-match on a name. Memory should preserve these distinctions rather than reducing every link to the same kind of line.

The professional can then ask: which cases are linked by this mechanism, and which are connected only by a person or phrase? Memory becomes a way to navigate reasons, not a catalogue of connections.

Date each interpretation

A conclusion from 2025, a new item of evidence from 2026 and a connection established in October 2026 belong to three different moments of knowledge. Bringing them together in a current summary is useful; presenting them as though they had always coexisted is not. Dating the interpretation helps explain what a team could reasonably decide at each stage.

This chronology prevents memory from becoming proof that an event should have been foreseeable. A later event may reveal a weakness that could not previously be identified. It may also show that an earlier signal was underestimated. Both possibilities should be recognisable without rewriting the original documents.

Useful memory therefore preserves successive states: link suggested, link confirmed, link rejected, mandate widened, conclusion maintained or revised. It need not expose multiple versions to everyone; it should ensure that sensitive decisions can be explained when they change.

A false link should disappear without erasing its past effects

Imagine two cases were connected because they shared the same supplier identifier. A later check shows that it was a generic code reused during a migration. The link should be removed. But if it led to a wider mandate or a request for evidence, the case should retain the reason for that step and the correction made afterwards.

This traceability distinguishes a reasonable decision based on information that was credible at the time from a decision maintained after that information had been disproved. It also allows the matching system to improve: the generic identifier should no longer be treated as a strong criterion.

Reopening a question is not the same as reopening the whole case

The third case may justify revisiting one precise point in a closed case without challenging all of its conclusions. A question about an approval workflow may be reconsidered while other findings remain unchanged. The reopening mandate should make that boundary explicit.

That approach protects both efficiency and fairness. It avoids turning every new recurrence into a full reinvestigation. It also allows decision-makers to understand why an older case has resurfaced: not necessarily because it was handled poorly, but because new information has made one of its points relevant again.

A closed case can therefore become a source without losing its status. Its conclusion remains dated; its evidence may inform a new question; its access rights may remain restricted. Memory connects uses without confusing states.

Govern cross-case analysis as an activity in its own right

An organisation should know who can create a connection, who can review it, who can use it to alter a mandate, and who can remove it. Those powers do not have to sit with the same person. A technical suggestion, an analytical validation and an investigative decision are three different acts.

It is also useful to know which types of relationship are searched for routinely and which require a specific decision. Comparing identifiers within the same transaction does not carry the same sensitivity as searching for a person across the entire historical case base. Scope should be proportionate to the purpose and the expected value.

Governance should also make room for disagreement. An investigator should be able to challenge a connection, request that it be reviewed, or record why they did not use it. A memory that keeps only accepted links creates an illusion of consensus; one that keeps the decision and its reason makes the path understandable.

Good memory does more than remember. It can say when, why and with what degree of confidence it linked two cases - and then change its mind.

At the end of this work, the organisation does not possess one giant case file. It has something better: cases that retain their integrity, qualified relationships between them and the ability to change scale when the facts justify it.

CONCLUSION

The third case changes the question, not the verdict

Return to the 8:47 a.m. report. Taken on its own, it already required serious handling: understand the requested exception, protect the communication channel, preserve the traces and identify the competent people. Connecting it with two older cases did not remove any of those obligations. It opened a second layer of work.

The team could ask whether the three situations shared the same exception mechanism. It had to verify the director's role in each case, the origin of the phrase 'we'll regularise it afterwards', the relevant procedure versions and the independence of the accounts. Some similarities may have grown stronger; others may have disappeared. The quality of cross-case analysis lies precisely in its ability to lose force when context explains a similarity.

The risk would have been to confuse recurrence with proof. Three cases do not automatically form a homogeneous body of evidence. The same name may come from a central role. The same vocabulary may come from a shared culture. The same type of incident may reveal a fragile process rather than a single perpetrator. The work is to make these competing explanations examinable.

The opposite risk would have been to keep cases in silos for fear of contamination. An organisation that refuses all cross-case analysis may repeat the same checks, handle separately people exposed to the same mechanism and miss a weakness that becomes visible only over time. Confidentiality should govern access, not prevent the organisation from understanding what repeats.

A robust practice therefore preserves several levels of truth. The facts in each case remain tied to their sources. Relationships between cases are qualified and revisable. Cross-case investigative steps have a mandate. Organisational measures do not automatically prejudge individual responsibility. Older conclusions remain dated when new material later casts them in a different light.

This way of working changes organisational memory. It does not become a register of suspicion. It becomes the ability to recognise when a question encountered before returns in another form, recover what was learned, and decide what genuinely deserves to be revisited.

Two cases may be a coincidence. The third changes the question. It never removes the need to do the work required to answer it.

Connecting cases means accepting that understanding may change scale without changing method: distinguish what is observed from what is assumed, return to sources, explain investigative steps and keep decisions open to review.

LucenOne's ambition

LucenOne develops a platform for handling and investigating sensitive matters. Cross-case analysis has a place when it helps professionals identify a recurrence, understand why the relationship has been

proposed and decide which verifications should follow - without turning a detected relationship into an automatic conclusion.

That ambition is methodological before it is technological: preserve case integrity, make relationships explainable, restrict access to the information needed and retain the history of decisions. The method remains usable independently of the software.

To discuss your cross-case practices, investigation continuity needs or a demonstration scenario: lucen.one. A first conversation can focus on how the work is organised without sharing names, evidence or confidential case information.

NOTES

References and scope of application

The situations, tables and working formulations in this paper are fictional. They offer a method for analysing relationships between cases; they do not describe a single legal procedure, constitute legal advice on a particular case or present measured LucenOne results. The cited texts retain their own scope, conditions and implementation timelines.

The following references were consulted on 12 September 2026. Numbers in square brackets refer to the relevant passages. Links lead to official sources; the current version should be rechecked before any later use.

[1] French Defender of Rights - Framework Decision No. 2025-019 of 5 February 2025

Recommendations to public and private employers on receiving reports and conducting internal investigations into discrimination, including sexual harassment. Used for principles of confidentiality, impartiality, objectivity and rigour, and for the concept of a body of converging indicators in this specific field. It is not presented as a universal procedure for every investigation.

[View the Framework Decision](#)

[2] AFA and PNF - Practical Guide to Internal Anti-Corruption Investigations

14 March 2023. Guide on the design and conduct of internal anti-corruption investigations, including initiation, scope, actors, investigative work and reporting. Used for the need for structured and objectively supportable work. Its anti-corruption scope is preserved.

[View the guide](#)

[3] Regulation (EU) 2016/679 - General Data Protection Regulation

27 April 2016, in particular Articles 5, 6, 9, 10, 22, 25, 32 and 35. Principles of purpose limitation, minimisation, accuracy and security, conditions of lawfulness, data protection by design and impact assessment. Used to underline that a technical ability to connect cases does not, by itself, constitute a purpose or authorisation for processing.

[View the GDPR](#)

[4] Directive (EU) 2019/1937 of 23 October 2019 - Protection of persons who report breaches of Union law

In particular Articles 16 to 18 on confidentiality, processing of personal data and record-keeping of reports. Used for requirements concerning identity protection, data relevance and proportionate retention within its scope.

[View the Directive](#)

[5] CNIL - Framework on professional whistleblowing systems

Deliberation No. 2023-064 of 6 July 2023. Framework covering data processing in professional whistleblowing systems, including purposes, categories of data, access permissions, information, retention and security. Used in Chapter 5; it does not constitute the complete legal framework for every internal investigation.

[View the framework](#)

[6] European Data Protection Board - Guidelines 4/2019 on Article 25 of the GDPR

Final version of 20 October 2020. Guidance on data protection by design and by default, including access limitation, necessity, relevance, aggregation, pseudonymisation and deletion. Used to support the design of a cross-case view that limits exposure of source cases.

[View the Guidelines](#)

[7] French Decree No. 2022-1284 of 3 October 2022 - Procedures for receiving and handling reports

French legislation governing internal and external procedures for receiving and handling reports within its scope. Used for requirements concerning organisation, competence, authority, resources, impartiality and forwarding to the competent people. Its provisions should be read together with the amended Sapin II Act and the texts applicable to the situation.

[View the Decree](#)

Continue the discussion

This paper follows The First 72 Hours and AI & Internal Investigations. The first focused on initial decisions; the second on connecting information within a case. This paper changes the scale: it examines what becomes visible when several cases begin to speak to one another.

LucenOne develops a platform for handling and investigating sensitive matters. This editorial work starts from the difficulties faced by people who receive information, conduct checks and need to keep their decisions understandable as time passes and the number of cases grows.

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