Case Suspension & Termination Policy
Department: Case Files & Investigations
Policy ID: CFI-07
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1. Policy Title

Case Suspension & Termination Policy

2. Authority & Legal Standing

2.1 **Binding Instrument.**
This Case Suspension & Termination Policy (“Policy”) constitutes a binding operational and contractual instrument governing when and how an investigative Case is suspended and/or terminated, and the minimum defensibility controls required to do so.

2.2 **Condition of Engagement and Continuation.**
Continued engagement with the Organisation—including commissioning, requesting updates, providing materials for case use, or using outputs—constitutes acceptance of this Policy as a condition of the Organisation’s willingness to commence, continue, suspend, or terminate investigative work.

2.3 **Procedural Defence Posture.**
This Policy is drafted to be relied upon in judicial, regulatory, arbitral, or oversight contexts as evidence that the Organisation applies structured restraint, safety controls, legality safeguards, and documented decisioning when deciding to pause or end investigative activity.

2.4 **No Implied Authority / No Outcome Reliance.**
Suspension or termination decisions do not create or imply statutory authority, enforcement authority, or adjudicative authority, and do not represent findings of fact, wrongdoing, liability, or innocence. They are governance and risk decisions only.

3. Purpose

3.1 **Primary Objective.**
To establish clear, auditable, non-punitive rules for pausing (suspending) or ending (terminating) investigative Cases to protect legality, safety, integrity, and organisational defensibility.

3.2 **Risk Containment Objective.**
To prevent continued investigative activity where continued work would likely increase legal exposure, safety risk, procedural failure, or reputational harm, or where the Case can no longer be pursued within required standards.

3.3 **Integrity Objective.**
To ensure that when a Case is suspended or terminated, the reasons and controls are documented in a form that demonstrates restraint and good-faith governance.

3.4 **Non-Determination.**
Suspension or termination is not a statement of truth, falsity, merits, or outcome. It is a decision about whether the Organisation will continue to operate on the Case within its standards.

4. Scope & Applicability

4.1 **What this Policy applies to.**
This Policy applies to decisions to suspend and/or terminate investigative work within opened Case Files in the Case Files & Investigations function.

4.2 **Who it applies to.**
This Policy applies to all personnel, contractors, and authorised contributors conducting investigative activity for or on behalf of the Organisation within a Case.

4.3 **When it applies.**
This Policy applies from the point a Case is opened until it is closed, terminated, archived, or otherwise formally concluded.

4.4 **Where it applies.**
This Policy applies regardless of where investigative work is conducted (on-prem, remote, third-party tooling environments), provided the work is performed for or on behalf of the Organisation.

4.5 **Explicit scope limitation clause (non-overlap).**
This Policy governs **only** the procedural decisioning and controls for Case suspension and Case termination. It does **not** govern case opening, scope locking, target definition, investigative conduct standards, tool usage standards, bias mitigation standards, escalation standards, analysis, archival record rules, publication decisions, external reporting, or volunteer governance. Those functions are out of scope for this Policy.

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5. Definitions (Local Only)

For the purposes of this Policy only:

5.1 **Case Suspension.**
A formal temporary pause of investigative activity on a Case, instituted to contain risk, resolve uncertainty, await required inputs, or prevent procedural harm, while preserving the possibility of lawful resumption.

5.2 **Case Termination.**
A formal decision to end investigative activity on a Case, with no expectation of resumption under current conditions, subject only to the Organisation's discretion to re-open under future separate decisioning.

5.3 **Suspension Trigger.**
A condition that requires or justifies the temporary pause of a Case under this Policy.

5.4 **Termination Trigger.**
A condition that requires or justifies ending the Case under this Policy.

5.5 **Containment State.**
A restricted operational mode applied during suspension or termination where investigative activity is halted or tightly limited to non-investigative administrative control actions necessary to secure the Case.

5.6 **Decision Record.**
The minimum auditable record of suspension or termination, consisting of trigger(s), decision rationale, decision authority, effective time, and imposed controls.

Definitions are local to this Policy and have no binding force outside it.

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6. Permitted Activities

Within the strict scope of this Policy, the Organisation may:

6.1 **Suspend Cases** upon defined suspension triggers, including safety, legality, procedural integrity, resource feasibility, or engagement failure.

6.2 **Terminate Cases** upon defined termination triggers, including illegality risk, inability to proceed within standards, repeated bad faith, or irreparable procedural contamination.

6.3 **Apply containment controls** during suspension or termination, including halting investigative steps and restricting access to case materials.

6.4 **Maintain administrative continuity** necessary to preserve procedural defensibility, including documenting decisions and preserving a minimal decision record.

6.5 **Communicate suspension/termination status** to a commissioning party or authorised stakeholder in neutral terms that avoid implying factual findings or allegations as truth.

6.6 **Refuse continuation** where continuation would conflict with this Policy.

Anything not listed here is implicitly disallowed within this Policy's scope.

7. Prohibited Activities

The following are expressly prohibited:

7.1 **Continuing investigative activity** after a suspension or termination decision takes effect, except for narrowly-scoped administrative containment actions permitted by Section 6.

7.2 **Using suspension or termination to expand scope** or to justify new targets, new collection pathways, or broader activity.

7.3 **Using suspension or termination as outcome engineering**, retaliation, reputational leverage, or political pressure.

7.4 **Misrepresenting suspension/termination** as findings of wrongdoing, guilt, innocence, entitlement, or validation of allegations.

7.5 **Terminating without a decision record**, unless prevented by immediate safety exigency, in which case the decision record must be completed as soon as safely practicable.

7.6 **Restarting a suspended case** without a documented resumption decision under this Policy.

7.7 **Concealing triggers** or suppressing suspension/termination triggers to keep a Case active.

8. Procedural Requirements

8.1 **Trigger Identification.**
When any trigger (suspension or termination) is identified, the investigator must immediately enter a containment posture appropriate to the risk, including halting investigative steps that could increase exposure, harm, or procedural contamination.

8.2 **Trigger Classification (Suspension vs Termination).**
The decision-maker must classify the situation as either:
(a) **Suspension** — where risk is potentially resolvable or time-bound; or
(b) **Termination** — where risk is structural, irreparable, or continuing would breach required standards.

8.3 **Mandatory Suspension Triggers (non-exhaustive but binding where present).**
A Case must be suspended when one or more of the following conditions apply:

(a) **Safety risk escalation** such that continuation could foreseeably cause harm or retaliation risk.
(b) **Legal uncertainty** where lawful continuation cannot be confirmed without further

verification.
(c) **Material procedural ambiguity** where continuation would likely produce non-defensible process artefacts.
(d) **Credible contamination risk** (e.g., compromised sources, compromised integrity of materials) pending containment.
(e) **Commissioning instability** where the commissioning party cannot or will not support lawful, bounded work (without implying wrongdoing).
(f) **Resource feasibility failure** where continuation would force shortcuts that reduce defensibility.

8.4 **Mandatory Termination Triggers (non-exhaustive but binding where present).**
A Case must be terminated when one or more of the following conditions apply:

(a) **Unlawful basis** is identified or continuation would reasonably risk unlawful access, unlawful processing, or other prohibited conduct.
(b) **Irreparable procedural contamination** such that defensible continuation is no longer possible.
(c) **Persistent bad-faith interaction** by commissioning parties or key sources that prevents neutral, bounded work (e.g., coercion, insistence on a predetermined outcome, repeated attempts to force prohibited activity).
(d) **Safety and harm risk** is structural and cannot be mitigated to an acceptable level through suspension and containment.
(e) **Non-cooperation** prevents the Case being pursued without undue speculation or uncontrolled assumptions.

8.5 **Decision Authority Requirement.**
A suspension or termination decision must be made by an authorised decision-holder designated by the Organisation. Investigators may recommend but must not treat recommendation as decision.

8.6 **Decision Record Requirement (minimum fields).**
Every suspension or termination must generate a Decision Record containing at least:

(a) Case identifier;
(b) decision type (suspension/termination);
(c) effective date/time;
(d) trigger category/summary;
(e) containment controls applied;
(f) decision authority role;
(g) status communications issued (if any).

8.7 **Status Communication Standard (neutrality).**
Any communication must be framed as: procedural posture + risk management + no

findings. Language implying guilt/innocence, truth/falsehood, or wrongdoing must be avoided.

8.8 **Resumption Procedure (for Suspended Cases Only).**
A suspended Case may resume only if:

(a) the suspension trigger is documented as resolved or controlled;
(b) resumption is authorised by the designated decision authority; and
(c) a resumption note is added to the Decision Record stating why resumption is now defensible.

9. Safeguards & Risk Controls

9.1 **Least-Harm Control.**
When deciding between suspension and termination, the Organisation must select the option that minimises foreseeable harm while preserving legality and defensibility.

9.2 **No-Expansion Safeguard.**
Suspension/termination procedures must not be used to widen scope, add targets, or change investigative posture beyond what is required to contain risk.

9.3 **Containment Integrity Control.**
During suspension/termination, only administrative containment actions are permitted. No new investigative steps may occur.

9.4 **Neutrality Safeguard.**
All decision language and outward communications must be neutral and procedural, avoiding narrative, accusation, or endorsement.

9.5 **Documentation-as-Evidence Control.**
Decision Records must be sufficient to demonstrate good-faith governance and restraint, but must avoid becoming a secondary evidence store beyond what is required for defensibility.

9.6 **Re-entry Risk Control.**
When a suspended Case is resumed, the resumption record must confirm that the original risks will not re-trigger immediately upon continuation.

10. Enforcement & Compliance Mechanisms

10.1 **Access Controls.**
The Organisation may restrict or revoke access to Case materials during suspension/termination to prevent continued investigative activity.

10.2 **Operational Lock.**
Where technically feasible, the Organisation may apply procedural or system locks preventing further investigative actions under the Case.

10.3 **Oversight Monitoring.**
The Organisation may review activity logs and case actions to confirm that suspension/termination containment has been respected.

10.4 **Conditional Continuation Rule.**
Continuation of investigative work contrary to a suspension/termination decision constitutes a material compliance breach.

11. Breach Handling & Remediation

11.1 **Breach Definition.**
A breach includes: continuing investigative activity during suspension; continuing a terminated Case without authorisation; falsifying or omitting Decision Records; using suspension/termination as leverage; or misrepresenting suspension/termination as findings.

11.2 **Containment Response.**
On suspected breach, the Organisation may immediately halt the Case, restrict access, and isolate affected work products pending review.

11.3 **Remediation Options.**
Remediation may include: retroactive suspension/termination confirmation, exclusion of tainted outputs from any further use, restriction or termination of internal access rights, and structural correction of process controls.

11.4 **Irreparable Breach Principle.**
Where a breach results in irreparable loss of defensibility, the Organisation may terminate the Case to protect legal and procedural integrity.

12. Limitation of Liability

12.1 **Procedural Role Only.**
The Organisation's role is procedural investigation within strict standards; suspension/termination is a governance control, not an adjudication.

12.2 **No Liability for Good-Faith Suspension/Termination.**
The Organisation is not liable for losses, delays, dissatisfaction, or downstream impacts arising from a good-faith decision to suspend or terminate a Case for legality, safety, integrity, or defensibility reasons.

12.3 **No Liability for External Reliance Beyond Scope.**
The Organisation is not liable for third-party reliance on partial casework, preliminary notes, or the existence of a case status decision outside the Organisation's stated bounds.

12.4 **No Limitation Where Prohibited.**
Nothing in this Policy limits liability to the extent such limitation is prohibited by applicable law.

13. Non-Delegation & Non-Expansion Clause

13.1 **No Expansion of Authority.**
This Policy cannot be interpreted to authorise activities outside its defined scope, nor to override other controls.

13.2 **No Delegation of Enforcement.**
This Policy does not confer enforcement authority, surveillance authority, or adjudicative authority to any person or party.

13.3 **No Policy Chaining.**
This Policy stands alone within its scope and must not be used as authority to justify any action outside suspension/termination decisioning and containment.

14. Jurisdiction & Governing Law

This Policy is governed by the laws of England and Wales.
All disputes arising in connection with this Policy fall within the jurisdiction of the courts of England and Wales, subject to mandatory statutory obligations.

15. Amendments & Version Control

15.1 This Policy may be amended only by the Organisation.
15.2 Amendments take effect upon publication of a revised version. Continued engagement constitutes acceptance of the amended Policy.
15.3 Version history must be retained to evidence which Policy version governed a decision at the time it was made.

16. Supremacy Within Scope

Within the domain of Case suspension and Case termination decisioning and containment, this Policy is authoritative and controlling. Outside that domain, it has no force.