Investigative Conduct Policy

Department: Case Files & Investigations
Policy ID: CFI-03
Version: 1.0
Effective Date: Upon Publication

1. Policy Title

Investigative Conduct Policy

2. Authority & Legal Standing

2.1 **Binding Instrument.**
This Investigative Conduct Policy ("Policy") is a binding operational and contractual instrument governing standards of conduct applicable to all investigative activity performed under an opened Case File within the Organisation.

2.2 **Condition of Engagement and Processing.**
By commissioning work, accepting an engagement, participating in casework, or otherwise interacting with the Organisation's investigative function, all parties operating under or within this function agree that investigative activity is conditioned on strict compliance with this Policy.

2.3 **Legal Reliance.**
This Policy is drafted to be relied upon in judicial, regulatory, arbitral, and oversight contexts as evidence that the Organisation maintains and enforces professional, restrained, lawful, and non-abusive investigative conduct.

2.4 **No-Implied Powers.**
Nothing in this Policy, nor any investigative activity performed under it, creates or implies statutory authority, enforcement powers, police powers, or any public-office mandate. The Organisation operates as a private entity conducting structured open-source and evidentiary research within lawful bounds.

3. Purpose

3.1 **Primary Objective.**
The purpose of this Policy is to define mandatory behavioural and procedural conduct rules governing how investigations are carried out, so that investigative activity remains lawful, proportionate, professional, and defensible.

3.2 **Risk Control Objective.**
This Policy exists to prevent misconduct, overreach, harassment, coercion, unlawful acquisition, intimidation, reckless communication, and reputational harm arising from investigator behaviour.

3.3 **Integrity Objective.**
This Policy exists to ensure the Organisation can demonstrate that investigative conclusions (if any) are the product of disciplined conduct and not the product of improper influence, unlawful access, manipulation, or bad-faith tactics.

3.4 **Non-Determination.**
Compliance with this Policy governs *conduct*, not *truth*, *merit*, *liability*, or *outcome*. Investigation is not adjudication.

4. Scope & Applicability

4.1 **What this Policy applies to.**
This Policy applies to conduct during any investigative activity undertaken under an opened Case File, including research, collection, triage, review, evaluation, correlation, and internal documentation performed for investigative purposes.

4.2 **Who this Policy applies to.**
This Policy applies to all personnel and contributors engaged in investigative work, including employees, contractors, volunteers (where permitted), and any third party acting under the Organisation's direction.

4.3 **When this Policy applies.**
This Policy applies from the moment investigative activity begins within a Case File and continues until the Case is formally closed, suspended, or terminated.

4.4 **Where this Policy applies.**
This Policy applies regardless of location, platform, device, or environment used to perform investigative activity.

4.5 **Explicit Scope Limitation Clause.**
This Policy does **not** govern:
(a) the admissibility of intake submissions;
(b) technical rules for investigative tooling or automation;
(c) analytical grading, scoring, or assessment frameworks;
(d) publication, editorial, or public disclosure decisions;
(e) archival, sealing, or chain-of-custody controls; or
(f) separation-of-duties assignment architecture.
This Policy governs investigator conduct only.

5. Definitions (Local Only)

For the purposes of this Policy only:

5.1 **Investigation.**
Any structured inquiry undertaken within a Case File to collect, validate, contextualise, or evaluate information for case purposes.

5.2 **Investigator.**
Any person acting on behalf of the Organisation to perform investigative activity.

5.3 **Improper Conduct.**
Any action that is unlawful, coercive, misleading in a way that induces reliance, harassing, threatening, or otherwise inconsistent with professional investigative restraint.

5.4 **Direct Interaction.**
Any communication with a subject, witness, third party, platform operator, or member of the public in connection with a Case.

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

6. Permitted Activities

Within the strict scope of this Policy, the Organisation may permit Investigators to:

6.1 Conduct lawful investigative activity using publicly accessible sources, lawful access pathways, and legitimate research techniques.

6.2 Record contemporaneous investigative notes documenting factual steps taken, timestamps, sources accessed, and procedural decisions made, provided such notes remain professional, non-abusive, and non-speculative in tone.

6.3 Maintain internal communications for coordination and governance purposes, provided such communications remain professional, relevant, and free from bias-driven or harassing language.

6.4 Apply professional restraint in how investigative material is described, including use of neutral language, conditional phrasing where uncertainty exists, and avoidance of conclusory or inflammatory characterisations.

6.5 Escalate concerns internally where a case presents legal risk, safety risk, or suspected misconduct by a participant.

Anything not explicitly permitted under this Policy is implicitly disallowed within this Policy's scope.

7. Prohibited Activities

The following are expressly prohibited:

7.1 **Unlawful Access and Acquisition.**
Any attempt to access systems, accounts, networks, closed forums, paywalled or restricted areas, or private communications without lawful authority and lawful access rights.

7.2 **Impersonation and Misrepresentation.**
Impersonating officials, employees of platforms, legal representatives, journalists, regulators, or any other role; or misrepresenting identity or purpose in a manner designed to induce disclosure or reliance.

7.3 **Harassment, Threats, or Coercion.**
Any conduct that is threatening, intimidating, coercive, abusive, or that could reasonably be perceived as harassment, stalking, or undue pressure.

7.4 **Entrapment and Provocation.**
Any attempt to provoke a subject or third party into actions, statements, or admissions for the purpose of "creating" evidence or manufacturing outcomes.

7.5 **Improper Direct Interaction.**
Any Direct Interaction that is not strictly necessary to legitimate case purposes, or that creates foreseeable risk of harm, intimidation, retaliation, or misinterpretation.

7.6 **Outcome-Led Investigation.**
Any conduct designed to "prove" a predetermined narrative rather than to test hypotheses, verify facts, and document uncertainty.

7.7 **Retaliatory or Punitive Conduct.**
Any attempt to punish, shame, embarrass, "dox," or otherwise harm individuals or organisations as an objective of investigation.

7.8 **Confidentiality Breach.**
Disclosing case existence, case content, investigative steps, or interim findings to unauthorised persons or channels.

7.9 **Evidence Manipulation.**
Altering, staging, selectively cropping, misleadingly excerpting, or otherwise manipulating materials in a way that distorts meaning or provenance.

7.10 **Dual-Use Misuse.**
Using investigative work products or access for personal benefit, personal disputes, commercial leverage outside engagement terms, or any purpose not strictly aligned with the Case mandate.

8. Procedural Requirements

8.1 **Conduct Acknowledgement.**
Investigators must acknowledge and operate under this Policy prior to conducting investigative activity.

8.2 **Professional Language Requirement.**
All case notes and internal communications must use neutral, professional language. Personal attacks, slurs, mockery, or adversarial editorialising are prohibited.

8.3 **Minimal Necessary Interaction Rule.**
Where Direct Interaction occurs, it must be minimal, case-necessary, and structured to avoid coercion, intimidation, or misinterpretation.

8.4 **Contemporaneous Step Recording.**
Investigative steps must be recorded contemporaneously to create defensible traceability of actions taken and sources used.

8.5 **Immediate Stop Rule.**
If an Investigator becomes aware that a contemplated action may be unlawful, unsafe, coercive, or likely to create unjustified harm, the action must not be taken and must be escalated internally.

8.6 **No-Outcome Pressure Rule.**
Investigators must not accept instructions or incentives that demand a predetermined conclusion or that reward a particular outcome.

9. Safeguards & Risk Controls

9.1 **Restraint-First Posture.**
Investigative conduct must default to the least intrusive, least escalatory approach consistent with legitimate case purposes.

9.2 **Collateral Harm Minimisation.**
Investigators must take reasonable steps to minimise foreseeable collateral exposure of uninvolved parties.

9.3 **Safety and Retaliation Risk Control.**
Investigators must not take actions that foreseeably elevate physical, reputational, employment, or harassment risk to any person without a compelling, lawful, and proportionate justification.

9.4 **Neutrality Control.**
Investigators must distinguish observed facts from inferences and must document uncertainty where it exists.

9.5 **Misinterpretation Control.**
Where communications occur, they must not create implied threats, implied official authority, or implied certainty of wrongdoing.

10. Enforcement & Compliance Mechanisms

10.1 **Access Conditionality.**
Investigative access and participation may be restricted, suspended, or revoked where compliance risk is identified.

10.2 **Internal Review Authority.**
The Organisation may review investigative conduct records, communications, and case notes for compliance monitoring and risk containment.

10.3 **Mandatory Escalation of Misconduct.**
Any suspected breach of this Policy must be escalated internally for assessment and containment.

11. Breach Handling & Remediation

11.1 **Breach Definition.**
A breach includes any prohibited activity, failure to follow procedural requirements, or conduct that creates unlawful risk, coercion risk, harassment risk, or misrepresentation risk.

11.2 **Containment.**
Upon suspected breach, the Organisation may immediately suspend relevant activity and restrict access pending review.

11.3 **Remediation.**
Remediation may include:
(a) removal of an Investigator from the Case;
(b) exclusion of tainted materials from case use;
(c) corrective documentation to address misstatements;
(d) implementation of tighter controls; and/or
(e) termination of the Case where integrity cannot be preserved.

12. Limitation of Liability

12.1 **No Liability for Unauthorised Misconduct.**
The Organisation is not liable for unauthorised acts by any person acting outside this Policy's permitted activities or contrary to express prohibitions.

12.2 **No Liability for External Reliance Beyond Scope.**
The Organisation is not liable for reliance by third parties on internal investigative activity, interim notes, or non-public materials.

12.3 **No Liability for Lawful Restraint.**
The Organisation is not liable for decisions to refrain from action, restrict conduct, or stop investigative activity for compliance reasons.

12.4 **No Exclusion Where Prohibited by Law.**
Nothing in this Policy limits liability to the extent prohibited by applicable law.

13. Non-Delegation & Non-Expansion Clause

13.1 **No Delegation of State Authority.**
This Policy does not delegate or create enforcement, police, surveillance, or adjudicative authority.

13.2 **No Expansion Beyond Scope.**
This Policy may not be interpreted to authorise activities beyond investigative conduct constraints, nor to override other organisational controls.

13.3 **No Publication Authority.**
Nothing in this Policy authorises public disclosure, naming, publication, or dissemination of investigative materials.

14. Jurisdiction & Governing Law

14.1 **Governing Law.**
This Policy is governed by the laws of England and Wales.

14.2 **Forum.**
Subject to mandatory statutory requirements that cannot be excluded, disputes arising from or materially connected to this Policy fall within the jurisdiction of the courts of England and Wales.

15. Amendments & Version Control

15.1 **Amendment Right.**
This Policy may be amended solely by the Organisation.

15.2 **Publication and Effect.**
Amendments take effect upon publication of an updated version number and effective date.

15.3 **Acceptance of Updates.**
Continued engagement, commissioning, or participation in investigative work after publication of an amended version constitutes acceptance of the amended Policy.

15.4 **Version Evidence.**
The Organisation will retain the version identifier associated with investigator acknowledgement and relevant case governance records.

16. Supremacy Within Scope

16.1 **Authoritative Within Scope.**
Within the domain of investigative conduct controls, this Policy is authoritative.

16.2 **No Force Outside Scope.**
Outside the domain defined in Section 4, this Policy has no force and may not be construed to govern other organisational functions.