Investigator Separation of Duties Policy

Department: Case Files & Investigations
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1. Policy Title

Investigator Separation of Duties Policy

2. Authority & Legal Standing

2.1 **Binding Instrument.**
This Investigator Separation of Duties Policy (“Policy”) is a binding operational and governance instrument establishing mandatory separation-of-duties controls for investigative work conducted within opened Case Files.

2.2 **Condition of Casework.**
No investigative activity may proceed unless case roles and decision functions are assigned in compliance with this Policy. Where compliant separation cannot be achieved, the Case must be escalated, suspended, or terminated under the applicable Case governance controls.

2.3 **Legal Reliance.**
This Policy is drafted to be relied upon in judicial, regulatory, arbitral, and oversight contexts as evidence that the Organisation prevents single-person dominance, reduces bias and misconduct risk through structural controls, and maintains defensible governance over investigative decisioning.

2.4 **No Implied Authority.**
Separation-of-duties is a governance control only. It confers no enforcement, surveillance, adjudicative, or statutory authority, and does not imply any conclusion as to the merits of any Case.

3. Purpose

3.1 **Primary Objective.**
The purpose of this Policy is to ensure that critical investigative functions are structurally separated so that no single individual can both initiate, execute, and self-approve the same high-risk actions or decisions within a Case.

3.2 **Risk Control Objective.**
This Policy exists to reduce risk of misconduct, overreach, evidence contamination, outcome-led inquiry, procedural shortcuts, retaliation dynamics, and conflicts of interest by implementing role-based checks and dual-control rules.

3.3 **Integrity Objective.**
This Policy exists to preserve the credibility and defensibility of investigative work products by ensuring that key decisions are reviewable, attributable, and not solely reliant on the unchecked discretion of one actor.

3.4 **Non-Determination.**
Role separation is not a judgement of guilt, innocence, credibility, or wrongdoing. It is an internal control to preserve procedural integrity.

4. Scope & Applicability

4.1 **Scope.**
This Policy governs assignment and separation of investigative roles, permissions, and decision functions within opened Case Files.

4.2 **Applicability.**
This Policy applies to all personnel, contractors, and authorised contributors performing investigative work or exercising governance decision functions within the Case Files & Investigations Department.

4.3 **When it applies.**
This Policy applies from the earliest point at which investigative activity is contemplated within an opened Case, and continues through escalation, suspension, termination, or closure.

4.4 **Explicit Scope Limitation Clause.**
This Policy governs separation of duties only. It does not govern investigative conduct standards, tool usage standards, bias mitigation procedures, target selection rules, escalation criteria, suspension/termination criteria, evidentiary handling, analytical methodologies, or publication decisions. Those are outside this Policy's scope and remain governed by their own immutable policies.

5. Definitions (Local Only)

For the purposes of this Policy only:

5.1 **Separation of Duties.**
A governance control requiring that certain high-risk functions and approvals are performed by different individuals or roles, such that no single individual can unilaterally perform and self-authorise the same critical action set.

5.2 **Role.**
A defined Case function assigned to an individual, governing what actions they may perform and what decisions they may make within that Case.

5.3 **Decision Function.**
A discrete authority to approve, deny, pause, escalate, suspend, terminate, or otherwise govern a Case posture or direction.

5.4 **Dual-Control Action.**
An action requiring at least two distinct roles to complete, typically one to propose or execute and one to review or approve.

5.5 **Incompatible Roles.**
Roles that may not be held by the same individual within the same Case due to risk of self-approval, unchecked discretion, or impaired defensibility.

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:

6.1 Assign defined Case roles to individuals based on competence, availability, and risk posture.

6.2 Require dual-control for designated high-risk actions and decisions.

6.3 Restrict, revoke, or reassign Case roles where separation cannot be maintained or where integrity risk is identified.

6.4 Record role assignments, role changes, and approval decisions as procedural governance evidence.

6.5 Apply compensating controls where staffing limitations exist, provided such controls do not collapse separation into a single unchecked actor.

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

7. Prohibited Activities

The following are expressly prohibited:

7.1 Assigning incompatible roles to the same individual within the same Case where such assignment would enable self-approval of critical decisions.

7.2 Allowing a single individual to function as sole initiator, executor, and approver for dual-control actions within the same Case.

7.3 Bypassing separation controls for convenience, speed, client pressure, reputational objectives, or outcome preference.

7.4 Retroactively recording role assignments or approvals after the underlying action has been performed.

7.5 Misrepresenting separation as achieved where it is not achieved in practice.

7.6 Using role separation as a pretext to expand scope, targets, or authority beyond what is otherwise authorised.

8. Procedural Requirements

8.1 **Mandatory Role Assignment Record.**
For every opened Case, the Organisation must create a Case Role Assignment Record that identifies, at minimum, who holds which role and what decision functions are assigned, with an effective date/time.

8.2 **Minimum Role Set Principle.**
Each Case must, at minimum, distinguish between a person performing investigative work and a person performing governance review for dual-control actions, except where a formal compensating control is applied under Section 9 due to operational constraints.

8.3 **Incompatible Role Rules.**
Within a single Case, the following combinations are incompatible and must not be held by the same individual where doing so would permit self-approval or unchecked discretion: the person responsible for conducting investigative work must not be the sole decision-holder for escalation decisions affecting their own work; the person proposing suspension or termination must not be the only role authorised to ratify that decision; the person controlling access permissions must not be the sole role determining whether access restrictions were complied with.

8.4 **Dual-Control Actions (Mandatory).**
The following are dual-control actions and require two-role separation in execution and approval: any material change in Case posture that pauses or resumes activity; any Case escalation decision; any Case suspension decision; any Case termination decision; any material reassignment of roles due to integrity risk; any decision to apply or remove a compensating control that substitutes for separation.

8.5 **Approval Trace Requirement.**
For each dual-control action, records must show who initiated or proposed the action, who approved it, and when each step occurred. The same individual must not appear as both initiator and approver for the same dual-control action.

8.6 **Role Change Discipline.**
Role changes must be recorded before the changed role is exercised. Emergency role changes may occur only where necessary to prevent harm or contain risk, and must be documented immediately once safe and practicable.

8.7 **No Silent Role Drift.**
Individuals must not assume roles informally. Any exercise of a decision function without recorded assignment constitutes a breach.

9. Safeguards & Risk Controls

9.1 **Default Separation Posture.**
The Organisation must default to separation of investigative execution from governance decisioning, particularly where decisions affect continuation, restriction, or termination of a Case.

9.2 **Compensating Controls (Where Staffing is Limited).**
Where full separation cannot be achieved due to resource constraints, the Organisation must apply compensating controls that preserve defensibility, such as time-delayed approval requirements, externalised review by an authorised independent role holder, or temporary suspension of the Case pending availability of separation. Compensating controls must be documented and must not result in a single unchecked individual acting as both executor and approver for dual-control actions.

9.3 **Conflict and Pressure Safeguard.**
Where an investigator is subject to pressure from a commissioning party, internal stakeholder, or source, the Organisation must treat this as a structural risk indicator and ensure that governance decisioning for dual-control actions is held by a separate role not exposed to that pressure.

9.4 **Least-Privilege Alignment.**
Role assignment must align with least-privilege principles so that access and decision functions are limited to what is necessary for the assigned role and do not enable unilateral expansion of control.

9.5 **Auditability Safeguard.**
Role assignment and dual-control records must be sufficient to demonstrate separation existed in practice, not merely on paper, while avoiding unnecessary inclusion of substantive case content.

10. Enforcement & Compliance Mechanisms

10.1 **Access Conditionality.**
Case access may be restricted or revoked where separation rules are breached or where role drift is detected.

10.2 **Governance Review Authority.**
The Organisation may review role assignment records and dual-control decisions to confirm compliance and identify integrity risk.

10.3 **Mandatory Corrective Action.**
Where separation is found to be non-compliant, the Organisation may require immediate role reassignment, implementation of compensating controls, or Case escalation, suspension, or termination where defensibility cannot be preserved.

11. Breach Handling & Remediation

11.1 **Breach Definition.**
A breach includes incompatible role assignments, self-approval of dual-control actions, informal assumption of decision functions, retroactive documentation, or any act that collapses separation into a single unchecked actor.

11.2 **Containment.**
On suspected breach, the Organisation may pause affected activity, restrict access, and isolate affected decisions pending review.

11.3 **Remediation.**
Remediation may include role reallocation, re-performance of affected decision steps under compliant dual-control, exclusion of tainted governance decisions from reliance, and, where integrity cannot be restored, Case suspension or termination to preserve organisational defensibility.

11.4 **Integrity Priority Principle.**
Where separation failure materially undermines defensibility, protecting integrity takes precedence over continuity or client satisfaction.

12. Limitation of Liability

12.1 **Governance Control Only.**
Separation of duties is a governance mechanism and does not warrant outcomes, findings, or continuity of service.

12.2 **No Liability for Good-Faith Controls.**
The Organisation is not liable for delays, pauses, restrictions, or non-continuation arising from good-faith application of separation controls or compensating controls.

12.3 **No Liability for External Interpretation.**
The Organisation is not liable for third-party interpretation of internal role controls or governance records.

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

13. Non-Delegation & Non-Expansion Clause

13.1 This Policy confers no investigative, analytical, publication, enforcement, or adjudicative authority beyond role separation controls.

13.2 This Policy may not be interpreted to expand scope, targets, or powers, and may not be used as a justification for additional collection or broader inquiry.

13.3 This Policy is a restraint and integrity framework only.

14. Jurisdiction & Governing Law

This Policy is governed by the laws of England and Wales.
Jurisdiction lies with 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.

15.3 The version in force at the time of role assignment and decisioning governs those acts.

16. Supremacy Within Scope

Within the domain of investigator separation of duties for Case governance decision functions, this Policy is authoritative. Outside that domain, it has no force.