Target Specificity & Proportionality Policy

Department: Case Files & Investigations
Policy ID: CFI-02
Version: 1.0
Effective Date: Upon Publication

1. Policy Title

Target Specificity & Proportionality Policy

2. Authority & Legal Standing

2.1 **Binding Instrument.**
This Target Specificity & Proportionality Policy ("Policy") is a binding operational and governance instrument governing the identification, definition, and limitation of investigative targets within an authorised Case.

2.2 **Condition of Investigation.**
No investigative activity may be undertaken unless investigative targets have been explicitly defined and assessed for proportionality in accordance 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 conducts investigations that are targeted, restrained, and proportionate, and does not engage in indiscriminate, speculative, or excessive inquiry.

2.4 **Non-Implied Authority.**
Authority to examine a target arises only where that target has been explicitly defined and justified under this Policy. No authority may be implied from case existence alone.

3. Purpose

3.1 **Primary Objective.**
The purpose of this Policy is to ensure that investigative activity is directed only toward clearly defined targets that are procedurally justified within the locked scope of a Case.

3.2 **Proportionality Objective.**
This Policy exists to ensure that investigative attention, data collection, and analytical effort remain proportionate to the stated investigative purpose and do not exceed what is reasonably necessary.

3.3 **Protective Objective.**
This Policy protects individuals, entities, and third parties from unnecessary exposure, collateral intrusion, or overbroad investigative treatment.

3.4 **Non-Determination.**
Designation of a target does not imply suspicion, wrongdoing, liability, or adverse inference. It authorises limited inquiry only.

4. Scope & Applicability

4.1 **Scope.**
This Policy governs the identification, definition, justification, and limitation of investigative targets within an authorised Case.

4.2 **Applicability.**
This Policy applies to:

All Cases formally opened under CFI-01
All investigative personnel, analysts, contractors, and systems
All forms of investigative activity, including research, data collection, and analysis
All commissioned, pro bono, and public-interest investigations

4.3 **Scope Limitation Clause.**
This Policy does not govern investigative methods, evidentiary standards, publication decisions, or enforcement actions. It governs target definition and proportionality only.

5. Definitions (Local Only)

For the purposes of this Policy only:

5.1 **Target.**
A person, organisation, entity, dataset, domain, event, or bounded subject explicitly designated for investigative attention within a Case.

5.2 **Target Specificity.**
The degree to which a target is precisely defined, bounded, and distinguishable from non-targets.

5.3 **Proportionality.**
The principle that investigative attention and data handling must not exceed what is reasonably necessary to address the authorised investigative purpose.

5.4 **Collateral Party.**
Any person or entity not designated as a target but potentially affected by investigative activity.

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 Define investigative targets that fall within the locked scope of an authorised Case.

6.2 Justify target inclusion based on relevance to the investigative purpose.

6.3 Limit investigative activity to defined targets only.

6.4 Apply proportionality assessments to restrict overbroad inquiry.

6.5 Exclude or remove targets where proportionality cannot be justified.

No other activities are permitted under this Policy.

7. Prohibited Activities

The following are expressly prohibited:

7.1 Investigating undefined or vaguely defined targets.

7.2 Conducting broad or indiscriminate inquiries without specific target designation.

7.3 Expanding targets by association, proximity, or speculation.

7.4 Investigating collateral parties absent explicit justification.

7.5 Treating relevance as justification for unlimited inquiry.

7.6 Using proportionality assessments to retrospectively justify overreach.

8. Procedural Requirements

8.1 **Mandatory Target Definition Sequence.**

Before investigative activity commences, the following steps must be completed:

a) Target Identification — proposed targets are identified
b) Specificity Definition — targets are precisely defined and bounded
c) Relevance Justification — relevance to investigative purpose documented
d) Proportionality Assessment — necessity and restraint assessed
e) Target Approval — targets approved within Case scope
f) Target Record Creation — audit record created

8.2 **No Deviation.**
Deviation from this sequence constitutes a breach.

9. Safeguards & Risk Controls

9.1 **Specificity Requirements.**
Targets must be defined using objective identifiers (e.g., names, roles, entities, datasets, timeframes) sufficient to distinguish them from non-targets.

9.2 **Proportionality Test (Mandatory).**
For each target, the following must be assessed and recorded:

– Investigative purpose served
– Necessity of inclusion
– Anticipated intrusion or exposure
– Availability of narrower alternatives
– Risk of collateral impact

9.3 **Default Narrowing Posture.**
Where multiple target definitions are possible, the narrowest reasonable definition must be adopted.

9.4 **Collateral Protection Safeguard.**
Investigative activity must be structured to minimise impact on collateral parties wherever practicable.

9.5 **Removal Safeguard.**
Targets must be removed or restricted where proportionality can no longer be justified.

10. Enforcement & Compliance Mechanisms

10.1 **Hard Gating.**
Systems and procedures must prevent investigative activity against non-approved targets.

10.2 **Audit Logging.**
Target definition and proportionality assessments must be logged, including:

Target identifiers
Justification summary
Proportionality outcome
Timestamp
Approving role or system

10.3 **Ongoing Review.**
Target proportionality may be reviewed where circumstances materially change, without expanding scope.

11. Breach Handling & Remediation

11.1 **Breach Definition.**
A breach includes:

Investigating undefined targets
Overbroad or indiscriminate inquiry
Failure to apply proportionality assessments
Unjustified inclusion of collateral parties

11.2 **Containment.**
Affected investigative activity is suspended pending review.

11.3 **Remediation.**
Remediation may include target restriction, exclusion of materials, or case scope correction.

12. Limitation of Liability

12.1 The Organisation authorises targeted inquiry, not general surveillance.

12.2 No liability arises from lawful limitation or exclusion of targets.

12.3 No liability arises from proportionality-based restraint applied in good faith.

12.4 Nothing limits liability where prohibited by law.

13. Non-Delegation & Non-Expansion Clause

13.1 This Policy confers no enforcement, adjudicative, or surveillance authority.

13.2 This Policy may not be interpreted to expand investigative scope beyond what is authorised.

13.3 Target designation is procedural, not accusatory.

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

This Policy may be amended only by the Organisation.
Amendments take effect upon publication.
Case Files retain the policy version in force at time of target approval.

16. Supremacy Within Scope

Within the domain of investigative target specificity and proportionality, this Policy is authoritative. Outside that domain, it has no force.