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# **BSI Standards Publication**

# Code of practice for the provision of investigative services



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## **Foreword**

#### **Publishing information**

This British Standard is published by BSI Standards Limited, under licence from The British Standards Institution, and came into effect on 30 September 2013. It was prepared by Technical Committee GW/3, *Manned security services*. A list of organizations represented on this committee can be obtained on request to its secretary.

#### Information about this document

This British Standard seeks to help providers of investigative services demonstrate their accountability at a time when the Government is implementing the licensing of such services.

NOTE The Home Office announced on 31 July 2013 that it intends to regulate private investigators.

The standard recognizes that some of its recommendations might be beyond the means of smaller service providers, e.g. sole traders, but affiliation to a professional body or engaging the services of other organizations ought to permit such providers to comply with the recommendations.

#### Use of this document

As a code of practice, this British Standard takes the form of guidance and recommendations. It should not be quoted as if it were a specification and particular care should be taken to ensure that claims of compliance are not misleading.

Any user claiming compliance with this British Standard is expected to be able to justify any course of action that deviates from its recommendations.

It has been assumed in the preparation of this British Standard that the execution of its provisions will be entrusted to appropriately qualified and experienced people, for whose use it has been produced.

#### **Presentational conventions**

The provisions of this standard are presented in roman (i.e. upright) type. Its recommendations are expressed in sentences in which the principal auxiliary verb is "should".

Commentary, explanation and general informative material is presented in smaller italic type, and does not constitute a normative element.

The word "should" is used to express recommendations of this standard. The word "may" is used in the text to express permissibility, e.g. as an alternative to the primary recommendation of the clause. The word "can" is used to express possibility, e.g. a consequence of an action or an event.

Notes are provided throughout the text of this standard to give references and additional information that are important but do not form part of the recommendations.

#### Contractual and legal considerations

This publication does not purport to include all the necessary provisions of a contract. Users are responsible for its correct application.

Compliance with a British Standard cannot confer immunity from legal obligations.

In particular, attention is drawn to the legislation in Annex A.

# Scope

This British Standard gives recommendations for the conduct, management, staffing and operational accountability for the provision of investigative services.

NOTE Additionally, this code of practice may be used by those who wish to purchase investigative services.

# Normative references

The following documents, in whole or in part, are normatively referenced in this document and are indispensable for its application. For dated references, only the edition cited applies. For undated references, the latest edition of the referenced document (including any amendments) applies.

BS 7858, Security screening of individuals employed in a security environment – Code of practice

#### 3 Terms and definitions

For the purposes of this British Standard, the following terms and definitions apply.

#### 3.1 client

person or organization requesting the investigative service

#### 3.2 independent adjudication

form of dispute resolution the outcome of which is a decision by an external independent third party, within a specified period of time, which is binding on the parties in dispute, and final if there is deemed to be no case to answer but conversely if a prime facie case is found, is determined by an external disciplinary process, unless and until reviewed by either arbitration or litigation

#### 3.3 investigative services

surveillance, inquiries or investigative activities that are carried out for the purposes of obtaining information about:

- a particular legal person or about the activities, status or whereabouts of a particular legal person; or
- the circumstances in which, or means by which, property has been lost, stolen, damaged or altered; or
- any other activities ancillary to current or anticipated legal proceedings, conducted under instruction of a client

NOTE A summary of these activities is given in Annex B. Attention is also drawn to the Private Security Industry Act [1].

#### 3.4 investigative service provider

legal person providing investigative services under contract

#### 3.5 investigative service provider owner

proprietor, partner, shareholder or director of an investigative service provider

#### 3.6 investigator

legal person contracted to conduct investigative services (see 3.3)

#### 3.7 legal person

individual or group that is allowed by law to take legal action, as originator or respondent

NOTE This includes natural persons (human beings), as well as fictitious persons (corporations).

#### 3.8 subcontractor

legal person to whom the investigative service provider contracts part of their work

#### 3.9 surveillance

process of:

- monitoring, observing or listening to persons, their movements, conversations and other activities or communications; or
- recording anything monitored, observed or listened to in the course of surveillance

NOTE Surveillance can involve the use of a surveillance device.

# 4 Investigative service provider

#### 4.1 Structure

The investigative service provider should possess a clearly defined management structure showing control and accountability at each level of operation.

Details of the senior manager or executive officer responsible for the operations should be established and a curriculum vitae made available to clients on request. Details of the investigative service provider owner should be made available. Any relevant unspent criminal convictions, business failures or liquidations, or undischarged bankruptcy of the owner should be disclosed on request.

NOTE 1 Attention is drawn to the Rehabilitation of Offenders Act 1974, as amended [2], whose provisions govern such disclosure.

The investigative service provider should operate a complaints management system. This should include recourse to independent adjudication.

NOTE 2 Further information on complaints managements is given in BS ISO 10002.

#### 4.2 Finances

The investigative service provider should act with financial probity and have in place the resources and financial controls to undertake an investigation.

NOTE 1 It is important that there is certainty when instructing or being instructed to undertake an investigation; certainty that the investigative service provider will undertake the entire investigation professionally and that if any part of any instruction is subcontracted, the subcontractor will be paid for the work that has been carried out.

Supplier and subcontractor fees should be paid promptly and within contracted timescales.

NOTE 2 Failure to do so could be regarded as failure to discharge a lawful debt. The arbiter of what constitutes a lawful debt is the court, through the issue of a money judgment or a decree, or an individual voluntary arrangement (IVA), liquidation (includes voluntary) or other insolvency event.

#### 4.3 Insurance

The investigative service provider should possess professional and other insurance cover commensurate with the services provided and the number of persons employed.

## 4.4 Legal compliance

The proposal forming part of the contract should demonstrate how the investigative service provider is compliant and the restrictions on activities imposed by legal requirements, such as the Data Protection Act 1998 [3], the Regulation of Investigatory Powers Act 2000 [4, 5], the Criminal Procedure and Investigations Act [6] and the Bribery Act [7] (see Annex A).

#### 4.5 Code of conduct

The investigative service provider should produce a code of conduct explaining its approach to its investigative services, by which it will abide and that can be provided to the client.

The code of conduct should cover, but not be limited to, the investigative service provider's values, obligations, duties, practices and compliance.

In particular, the code of conduct should cover the following.

- a) Responsibility and accountability.
- b) Honesty and integrity.
- c) Conflicts of interest.
- d) Compliance with the law.
- e) Authority, respect and courtesy.
- Equality.
- g) Confidentiality.
- h) General conduct.
- Challenging and reporting improper conduct.

NOTE An example code of conduct is given in Annex C.

#### **Subcontractors** 4.6

Subcontractors should be required to comply with the investigative service provider's code of conduct.

# 5 Resourcing

#### Staffing: selection and screening 5.1

#### Staff 5.1.1

All staff should be selected and screened in accordance with BS 7858. In addition, the selection of investigators should be based on the following.

- a) A credit check to determine whether an applicant or applicant's business(es) is clear of any monetary judgment or insolvency.
- b) The production of a Criminal Conviction Certificate (Basic Disclosure) that is no older than three years.
- c) Provision of two professional referees from whom references can be obtained.

d) Interview by an individual or panel of, or on behalf of, the investigative service provider and assessment of suitability.

- e) Production of proof of identity and residence at the interview.
- f) Production of the necessary qualifications.

If employees are acquired through a takeover, the investigative service provider should satisfy itself that the employees have been or are screened in accordance with BS 7858.

Prospective employees should be required to demonstrate appropriate skills sufficient to perform their roles effectively.

Prospective employees should be asked to confirm that there is nothing in their circumstances that would be detrimental to their operational commitments.

#### 5.1.2 Subcontractors

Subcontractors should be security screened in accordance with BS 7858. Where this is not practicable, priority should be given to selection from members of professional organizations whose conditions of membership are consistent with **5.1.1**, items a) to f).

Subcontractors should only be selected and used when the investigative services provider has conducted an assessment in order to identify and mitigate any risk.

### **5.1.3 Changes to circumstances**

The investigative service provider should ensure that all staff and subcontractors are obliged to declare immediately any changes to the information obtained during the selection and screening process.

#### 5.2 Health

The investigative service provider should ensure that the health and physical condition of staff remain compatible with their operational commitments.

NOTE Where health and safety risk or medical concerns of personnel are raised, it is reasonable for a investigative service provider to ask an investigator to undergo a medical examination to ensure fitness.

#### 5.3 Licensing status

A record of the current status of relevant licences should be maintained and regularly reviewed.

The investigative service provider should hold on file six-monthly authenticated versions of the most up-to-date copies of driving licences where staff are required to drive on business purposes.

Regular checks should be carried out to confirm that staff requiring licences comply with the terms and conditions of their licence at all times.

# 5.4 Training

#### 5.4.1 Policy

The investigative service provider should have a clearly defined and documented training policy.

#### 5.4.2 Induction

The investigative service provider should provide induction for staff in matters related to conditions of employment and organizational procedures.

#### **Competence** 5.4.3

The investigative service provider should ensure that, before an investigator conducts the following activities, the necessary competence has been demonstrated.

- a) Conducting investigations.
- b) Conducting interviews.
- c) Searching for information and preserving evidence.
- d) Surveillance (techniques).
- e) Understanding and working to relevant laws and standards.
- Reporting findings.

NOTE Competence can be demonstrated by qualifications that are mapped to national occupational standards.

#### Continuous professional development 5.4.4

The investigative service provider should monitor the effectiveness of all investigators and, if necessary, refresher or remedial training should be provided as soon as practicable.

If there is a change in methods, procedures or legislation, the investigative service provider should ensure that investigators are retrained to a proficient level. If practicable, training should take place before change is implemented.

#### 5.4.5 Training records

Evidence of training and qualifications assessed against recognized national occupational standards/qualifications or equivalent should be recorded and a copy retained.

#### Identification 5.5

Investigators should be issued with a means of photographic identification incorporating as a minimum the name, address and telephone number of the investigative service provider and emergency contact details.

#### 5.6 **Premises**

The investigative service provider should have an administrative office(s) and/or operational centre(s) where records, professional and business documents, certificates, correspondence, files and other documents necessary for conducting business transactions should be kept in a secure manner.

#### **Equipment** 5.7

All equipment used by or supplied to investigators should be appropriate to meet operational requirements.

The investigative service provider should have processes in place to ensure correct control, use, maintenance and availability of equipment.

NOTE Equipment also needs to meet legislative and regulatory requirements.

# 6 Client instructions

# 6.1 Scope of investigative services

When possible, written instructions should be obtained from the client, specifying the parameters and extent of the investigation, with clearly identified objectives. Where the client provides instructions verbally, the investigative service provider should document these for future reference.

## 6.2 Due diligence

#### 6.2.1 Conflict of interest

The investigative service provider should satisfy itself that there is no potential for conflict of interest. If, during the investigation, a conflict of interest becomes apparent, the investigative service provider should inform the client in writing so that the client (or service provider) can decide whether they want to continue with the instructions.

NOTE See C.3 for further guidance. Attention is drawn to the Bribery Act [7].

#### 6.2.2 Identity of client

The investigative service provider should ensure that they know the identity of the prospective client and that the prospective client has an ethical and legitimate reason for requesting the investigation.

#### 6.2.3 Management of information

NOTE 1 Information includes reports, references and other documents, photographs and data of any description.

Separate records (hard copy or electronic) should be maintained for each client, employee and subcontractor.

The records, administrative systems and procedures should ensure that data being processed are secure and protected against disclosure, and are only accessible to authorized persons. Records should, where necessary, be marked with an appropriate classification, e.g. "client confidential".

NOTE 2 Attention is drawn to provisions of the Data Protection Act 1998 [3] and the Criminal Procedure and Investigations Act [6].

Amended or updated records should be identifiable by date and clearly distinguishable from previous versions.

Information stored in an electronic retrieval system should be regularly backed-up. The back-up copies should be stored separately.

NOTE 3 Further information on the management of electronic data can be found in BS ISO/IEC 27001. Advice on the storage of electronic media can be found in PD 5454.

Archived records should be clearly indexed.

Minimum and maximum periods for retention of records should be reviewed and determined with regard to potential liabilities for civil or criminal action, subject to any applicable legislation. Such records may include:

- a) all issues of client instructions;
- b) investigative reports (see **6.3.4**);
- c) financial records;
- d) details of investigators employed on the contract; and
- e) exhibits, where relevant.

> NOTE 4 It is recommended that information relating to a contract is maintained for at least six years after termination.

#### Conducting the investigation 6.3

#### 6.3.1 **Planning**

The investigative service provider should plan how it intends to meet the client's requirements, taking account of issues such as the following.

- a) Risk assessment.
- b) Selection of investigators and allocation of responsibilities.
- c) Timescales.
- d) Geographical considerations.
- e) Resources (including budget restraints), communication and logistics.
- f) Liaison with relevant third parties.
- g) Special requirements, including specific insurance and licensing requirements.

#### 6.3.2 Information gathering

Information should be obtained using the following investigative activities, as necessary.

- a) Implementation:
  - 1) developing an investigation plan that takes into account financial, resource, time and legal constraints;
  - choosing appropriate investigative methods and resources;
  - systematically analysing, grading and corroborating information in order to establish patterns and links; and
  - accurately recording the details of gathered information and the results and findings of the investigation.
- b) Interviewing witnesses:
  - 1) specifying the objectives of interviews and working to them;
  - 2) sensitively and courteously conducting interviews, taking account of witnesses' rights, privacy, identified special needs and confidentiality requirements;
  - encouraging witnesses to provide accurate and reliable information that is relevant to and supports the investigation;
  - assessing and corroborating the value, importance, relevance and reliability of the information elicited from witnesses;
  - producing accurate and legible statements, including corrections, alterations and additions which have been agreed and endorsed by witnesses;
  - 6) ensuring, when third parties are present, that correct procedures are followed and that witnesses are not influenced by them; and
  - 7) ensuring that the integrity of exhibits is preserved.

- c) Interviewing suspects:
  - 1) preparing and planning for interview by:
    - i) specifying the objectives of the interview and working to them;
    - ii) gathering relevant background information;
    - iii) confirming suspects' identities;
    - iv) setting up and checking that any equipment to be used is working properly;
    - sensitively and courteously interviewing suspects, taking account of their rights, privacy and identified needs, whilst maximizing the acquisition of facts;
    - vi) using equipment that supports the interview in strict accordance with legal requirements and manufacturers' instructions;
    - vii) encouraging suspects to provide accurate information that is relevant to and supports the investigation;
    - viii) suspending and reconvening interviews;
    - ix) following correct procedures for managing the presence of third parties;
    - x) dealing with suspects' aggressive or antisocial behaviour promptly so as to protect everyone's wellbeing; and
    - xi) taking prompt action to calm any grievance where indications of suspicion are proved to be unfounded;
  - 2) accurately recording and interpreting relevant facts, and establishing, where possible, the level of suspects' involvement; and
  - producing accurate and legible statements, including corrections, alterations and additions which have been agreed and endorsed by suspects.
- d) Searching for information and evidence:
  - carrying out, sensitively and courteously, searches whilst maximizing opportunities to gather physical/potential evidence;
  - 2) identifying and searching appropriate sources of information to support the investigation;
  - 3) maintaining the confidentiality and security of information;
  - 4) taking prompt and appropriate action when finding information, physical evidence or potential evidence; and
  - 5) preserving the continuity and security of evidence.
- e) Basic surveillance:
  - 1) preparing and planning the surveillance by:
    - i) specifying its objectives and working to them;
    - ii) obtaining, where appropriate, the authority to carry it out;
    - iii) identifying and allocating resources;
    - iv) choosing and using appropriate, ethically acceptable and legal surveillance methods;
    - v) checking that any equipment to be used is working properly; and
    - vi) ensuring that, if others are to be involved in the surveillance, they know and understand their roles and their responsibilities;

- 2) when possible, reconnoitring the target's location;
- 3) locating and occupying the correct surveillance start position;
- using surveillance equipment in accordance with manufacturers' or suppliers' instructions;
- 5) taking prompt and appropriate action if contact with the target is lost;
- 6) communicating, when required, with others who are contributing to the surveillance;
- recording and, when required, relaying accurate information about observed targets to others who are contributing to the surveillance;
- operating in a manner which protects the well-being of everyone involved in the surveillance:
- 9) accurately transcribing written or recorded surveillance notes;
- 10) confirming the extent to which the quality, quantity and relevance of recorded information supports the surveillance objectives;
- 11) handling and storing written and recorded information in ways that preserve its continuity, security, confidentiality, integrity and value as evidence: and
- 12) collating, analysing and interpreting the information obtained during the surveillance.
- Maintaining knowledge and understanding of applicable laws and standards:
  - 1) finding and using sources of information on laws, procedures and standards of behaviour;
  - maintaining a working knowledge of current and emerging laws and standards of behaviour that potentially impact on investigative activities, particularly those relating to laws of evidence and procedures;
  - understanding the differences between English, Welsh and Scottish law where necessary;
  - recognizing when to involve police and/or other public services in investigations; and
  - recognizing when to obtain advice and guidance from others and then seek them out.

#### 6.3.3 Analysis and review

During the course of each investigation, ongoing analysis and review should be conducted to identify any legal issues, evidential gaps, training needs and measures to improve service capability, and to determine the level of compliance with the client's instructions.

Any action points should be noted and implemented. A record of these should be kept.

#### Completion of investigation 6.3.4

A report should be prepared to explain to the client the findings of the investigation and, where the investigator is competent to do so, provide advice on possible avenues of recourse or action/non-action. A copy of this should be kept on file.

NOTE Attention is drawn to the Data Protection Act [3].

# Annex A Legislative/statutory framework for investigative (informative) services

Knowledge of the following legislation is desirable in the provision of investigative services.

#### a) The Consumer Credit Act 1974, as amended [8]

The provisions most relevant to investigators are those on debt adjusting, counselling, collecting and acting as a credit reference agency.

The Office of Fair Trading (OFT) *Debt Collection Guidance* [9] sets out the types of behaviour that constitutes unfair business practices and which would call into question fitness to retain or be given a consumer credit licence under the Consumer Credit Act [8].

# b) The Police and Criminal Evidence Act 1984 [10]/ Criminal Procedure Rules 2012 [11]/ Civil Procedure Rules 2012 [12]/ The Criminal Procedure (Scotland) Act 1995, as amended [13]

These contain important provisions for the admissibility of evidence.

#### c) The Computer Misuse Act 1990 [14]

This Act created the criminal offences of unauthorized access to computer systems and using a computer to commit a criminal offence.

#### d) The Criminal Justice and Public Order Act 1994 [15]

This Act created the offence of "knowingly or recklessly" obtaining data held on a computer from another or encouraging someone to do so. It also made computer-related "pretext" enquiries illegal.

#### e) The Protection from Harassment Act 1997 [16]

This Act is intended to protect individuals from stalkers.

#### f) The Crime and Disorder Act 1998 [17]

This Act encourages police, local authorities and other agencies to reduce crime and disorder in their communities.

#### g) The Public Interest (Disclosure) Act 1998 [18]

This Act is intended to encourage "whistle-blowers" to advise if a (mainly environmental) offence is being or about to be committed by businesses, by allowing them immunity and, in the event of being dismissed by their employer, a right to compensation.

#### h) The Data Protection Act 1998 [3]

The Data Protection Act [3] gives individuals the right to know what data are held on them and the manner in which these are processed.

# i) The Regulation of Investigatory Powers Act 2000 [4]/ The Regulation of Investigatory Powers (Scotland) Act 2000 [5]

These Acts regulate those employed by, or contracted to, public authorities on the conduct of investigations, e.g. benefits fraud or neighbourhood disputes and anti-social behaviour.

#### j) The Human Rights Act 1998 [19]

The HRA 1998 applies to "public authorities" and requires the UK Government to pass legislation to ensure compliance with the Articles of the European Convention on Human Rights [20]. The Articles most relevant to investigators are Article 6, Right to a Fair Trial, and Article 8, Right to Respect for Private Life and Family.

#### k) The Freedom of Information Act 2000 [21]/ The Freedom of Information (Scotland) Act 2002 [22]

These Acts require any "public authority" (and those providing services for it) to inform a person, on making an appropriate request, whether the authority holds information on them.

#### The Private Security Industry Act 2001 [1]

This Act sets out the functions and purpose of the Security Industry Authority and includes the approval of businesses and licensing of individuals operating in designated areas of the private security industry.

#### m) The Protection of Freedoms Act 2012 [23]

This Act provides for the destruction, retention, use and other regulation of certain evidential material; provides for a code of practice about surveillance camera systems; and provides for the appointment and role of the Surveillance Camera Commissioner, to provide for judicial approval in relation to certain authorizations and notices under the Regulation of Investigatory Powers Act 2000 [4].

#### The Money Laundering Regulations 2007 [24]

These Regulations require solicitors and high-value dealers to comply with stringent "know-your-customer" procedures relating to large-scale financial transfers.

#### o) The Criminal Procedure and Investigations Act 1996 [6]/ The Criminal Procedure (Scotland) Act 1995 [13]

These Acts contain provisions on the identification of roles within an investigation and the disclosure of evidence.

#### p) The Bribery Act 2010 [7]

The Bribery Act consolidated common law and legislation relating to bribery and created two general offences of bribing and being bribed. In addition, the Act introduced a new offence of bribing foreign public officials. The Act also makes it an offence to fail to prevent bribery.

#### q) The Fraud Act 2006 [25]

This Act sets out various offences in England and Wales, and defines three categories of fraud: fraud by false representation, fraud by failing to disclose information and fraud by abuse of position.

#### The Theft Act 1968 [26]

This Act created a number of offences against property in England and Wales, though some of the offences of deception were redefined by the Fraud Act 2006 [25].

#### The Consumer Insurance (Disclosure and Representations) Act 2012 [27]

This Act indicates what information is to be given by people when applying for insurance "wholly or mainly for purposes unrelated to their trade, business or profession" and the remedies available to insurers if the information is incorrect.

#### The Civil Procedure Rules, Part 31: Disclosure and inspection of documents [28]

# Annex B Activities associated with investigative services (informative)

The following is a non-exhaustive list of activities associated with the provision of investigative services.

- a) Accident investigation
  - 1) Road traffic
  - 2) Workplace
  - 3) "Trip and slip"
  - 4) Scene reports
- b) Blackmail
  - 1) Defamation
  - 2) Product contamination
- c) Family
  - 1) Children
  - 2) Adoption
  - 3) Abduction/kidnap
  - 4) Missing persons
  - 5) Genealogy
- d) Fraud investigations
  - 1) False accounting
  - 2) Forgery
  - 3) Fraud by misrepresentation
  - 4) Fraud by omission
  - 5) Fraud by abuse of position
  - 6) Bribery and corruption
- e) Loss investigations
  - 1) Insurance
  - 2) Damage
- f) Intellectual property
  - 1) Copyright
  - 2) Trademarks
  - 3) Product counterfeiting
- g) Provenance
  - 1) Land
- h) Debt recovery (consumer and commercial)
  - 1) Repossessions of property or chattels
  - 2) Status enquiries

NOTE See the Credit Services Association Code of Practice [29].

- Statement taking: civil/criminal i)
- Due diligence j)
  - 1) Employment issues (recruitment)
  - 2) Pre-suit reports
  - 3) Investments
  - 4) Corporate/Commercial merger and acquisitions
- k) Surveillance
  - 1) Observation (static or mobile)
  - 2) Electronic
  - 3) Countermeasures
  - 4) Photography
- l) Theft investigations
- m) Tracing
  - 1) Debtors [see item h)]
  - 2) Missing persons
  - 3) Relatives
  - 4) Adoption
  - 5) Probate
- n) Litigation support
  - 1) Process serving where enquiries are necessary
  - 2) Liaison between solicitors and their clients
  - 3) Scene of crime/allegation
  - 4) Collecting, preserving and/or presenting evidence
  - 5) Interviewing witnesses/suspects
  - 6) Statement taking civil/criminal
- o) Employment Investigations

# Annex C **Example code of conduct** (informative)

# **C.1** Responsibility and accountability

Our investigators are personally responsible and accountable for their actions, as are our employees and other persons paid to assist an investigation.

## **C.2** Honesty and integrity

Our investigators act with honesty and integrity, and do not compromise their position, that of the service provider or any of their clients.

### **C.3** Conflict of interest

Where our investigators have a personal or conflicting interest in any matter in which they are involved they disclose that interest, if they know it to be in conflict with the interests of their clients.

# c.4 Compliance with the law

Our investigators obey the law and refrain from carrying out any act that they know, or ought to know, is unlawful or contrary to the service provider's policy.

# **C.5** Authority, respect and courtesy

Our investigators respect the rights of all individuals and do not abuse their position.

## C.6 Equality

Our investigators act with fairness and impartiality. They do not discriminate on the grounds of sex, race, colour, language, religion or belief, political or other opinion, national or social origin, association with a national minority, disability, age, sexual orientation, property, birth or other status.

## **C.7 Confidentiality**

Our investigators treat with respect any information with which they are entrusted during the course of business, and access or disclose it only for the purposes for which it is intended.

#### c.8 General conduct

Our investigators act in a professional manner.

They do not behave in a manner which brings, or is likely to bring, discredit upon themselves, the service provider or any of their clients, or act in a way that undermines or is likely to undermine confidence in themselves, the service provider or that of any of their clients.

# **C.9** Challenging and reporting improper conduct

Our investigators challenge and, when appropriate, take action or report breaches of this code and the improper conduct of colleagues.

# **Bibliography**

#### Standards publications

For dated references, only the edition cited applies. For undated references, the latest edition of the referenced document (including any amendments) applies.

BS ISO 10002, Quality management – Customer satisfaction – Guidelines for complaints handling in organizations

BS ISO/IEC 27001, Information technology – Security techniques – Information security management systems - Requirements

PD 5454, Guide for the storage and exhibition of archival materials

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