



The Case for Policy & Procedure Manuals in Private Investigation Agencies

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In the world of private investigation, agencies walk a fine line between risk, compliance, ethics, and client expectations. The pressures are constant: clients demand quick results, regulators demand compliance, courts demand defensibility, and the market demands efficiency. With so many competing forces, what keeps a professional agency grounded isn't only experience or instinct—it's a well-structured, consistently maintained Policy and Procedure manual.

A policy manual may not be the most glamorous part of investigative work, but it is the backbone of a professional agency. When designed well, it doesn't just sit on a shelf; it shapes culture, protects the agency legally, and ensures consistent, high-quality results for clients. In fact, a strong manual is often the difference between an agency that scales with confidence and one that stumbles when challenged.

RISK MANAGEMENT AND DEFENSIBILITY

Perhaps the most obvious benefit of a manual is risk management. Investigations

often put agencies in legally sensitive situations. If a regulator, insurance carrier, or even a court questions an action, an agency with a clear, enforced manual can demonstrate it acted within defined boundaries. A written manual shows that procedures were not improvised in the moment but are instead part of a deliberate, lawful, and ethical approach.

Without one, agencies expose themselves to accusations of negligence or misconduct. With one, they can point to policies that require specific approvals before surveillance, standards for evidence handling, and strict adherence to privacy laws. In disputes, that

level of foresight is invaluable.

CONSISTENCY, EFFICIENCY, AND SCALE

A policy manual also creates consistency in a profession that thrives on unpredictability. Investigators may face dramatically different cases—surveillance in one, workplace misconduct in another, or a sensitive domestic matter in the next—but the processes behind each case should not vary wildly from one investigator to another. The manual creates a blueprint, reducing errors and providing clients with reliable, repeatable service.

This consistency also supports efficiency. When procedures are spelled out in advance, investigators avoid wasting time debating how to handle routine matters. Templates, checklists, and standardized workflows streamline the job, freeing investigators to focus on the unique aspects of a case. As an agency grows, that efficiency becomes essential: tribal knowledge cannot sustain a multi-person or multi-state operation.

ETHICS AND CULTURE

Beyond logistics and compliance, a manual is a cultural cornerstone. A well-written policy and procedure manual communicates the agency's values and ethical commitments. It can establish clear expectations about conflicts of interest, confidentiality, the proper handling of sensitive information, and the boundaries of lawful investigation.

Such clarity builds internal trust and accountability. It also assures clients that the agency takes ethics seriously. When clients see policies on declining unlawful requests or clear guidance on how data is handled, they recognize the agency as not just competent but principled. That credibility often becomes a competitive advantage.

BUILDING A MANUAL THAT WORKS

So what does a strong manual actually look like? The most effective ones are written in plain language, not dense legalese. They avoid vague statements and instead provide specific, actionable steps that investigators can apply under real-world pressures. Every section should answer a few key questions: Who is responsible? When is the action required? What tools or forms must be used? How is it documented?

A manual should cover the full spectrum of agency operations. At the governance level, it outlines mission, values, organizational structure, and approval authority. In compliance, it identifies the laws and licensing requirements the agency must follow, from state-level PI regulations to federal privacy statutes like the Fair Credit Reporting Act or the Driver's Privacy Protection Act. For client

management, it sets standards for intake, retainers, communication, billing practices, and ethical limits.

Casework naturally forms the bulk of the manual. Here, procedures for surveillance, interviews, OSINT research, GPS or technical surveillance, and evidence handling are detailed. Each procedure should integrate best practices and jurisdictional restrictions, such as recording consent rules or GPS limitations. Manuals also address reporting standards, from how evidence is logged and authenticated to the style, objectivity, and delivery of final reports.

An often-overlooked but vital element is the Human Resources (HR) component. A comprehensive manual should detail hiring and vetting processes, including background checks, licensing verification, and reference requirements. It should include a clear code of conduct, guidelines for workplace behavior, anti-harassment and equal opportunity policies, and progressive discipline steps. Agencies benefit from outlining training expectations and career development pathways, ensuring investigators are not only compliant but also continually improving. This HR focus reinforces professionalism, reduces liability, and helps attract and retain top talent.

ALIGNING WITH STANDARDS AND LAWS

A credible manual does not exist in isolation. It should reflect national and industry standards while tailoring them to the agency's specific practice. Codes of ethics from state or national PI associations provide a strong ethical baseline. Standards from organizations like ASIS International or forensic bodies such as The Scientific Working Group on Digital Evidence (SWGDE) or the National Institute of Standards and Technology (NIST) can be adapted to strengthen investigative, evidence, and security practices.

Legal alignment is even more critical. Agencies must regularly review changes in laws governing privacy, surveillance, employment, and data protection, adjusting their manuals to remain compliant. In multi-state operations, a single manual may be supplemented with state-specific appendices to account for differing laws on recording consent or GPS use.

REVIEW AND REVISION

A policy manual is only as good as its maintenance. Too often, agencies create a manual once and never revisit it, leaving procedures outdated or irrelevant. The best practice is to conduct a formal review at least annually, with immediate revisions when laws change, incidents occur, a policy failure

is recognized, or new services are offered. Every change should be logged with a version history, ensuring transparency about when and why updates were made.

Communication is just as important as the updates themselves. Staff must be notified of revisions, trained on new procedures, and required to acknowledge receipt. In the months following a significant change, audits or spot checks can confirm that the updated procedure is being followed in practice.

MAKING THE MANUAL LIVE

For many investigators, the challenge is not writing a manual but making it a living document rather than a forgotten binder. Accessibility is key. Digital manuals, stored in secure shared platforms with proper version control, allow everyone in the agency to reference current procedures. Quick-reference guides or mobile-friendly checklists can bridge the gap between theory and practice in the field.

Training also keeps the manual alive. Onboarding programs should map directly to the manual's sections, while ongoing training can use scenarios, tabletop exercises, or micro-learning refreshers to keep critical topics top of mind. By documenting training completion, agencies not only reinforce knowledge but also strengthen their legal defensibility.

COUNSEL, INSURANCE, AND OVERSIGHT

Another often-overlooked benefit of a strong manual is its role in external relationships. Insurance carriers frequently reduce risk premiums for agencies that demonstrate written procedures and compliance programs. Legal counsel can also help review policies, ensuring they do not create unintended obligations and that they align with privilege and work-product protections where applicable.

Additionally, clients themselves increasingly expect formal policies. Corporate clients in particular may request to review an agency's data handling or evidence chain-of-custody policies before awarding contracts. Having a professional, up-to-date manual in place can set one agency apart from another.

A CALL FOR NATIONAL STANDARDS AND ACCREDITATION

While agency-level policy manuals are essential, the profession as a whole would benefit from a higher level of oversight. Law enforcement has long relied on the Commission on Accreditation for Law Enforcement Agencies (CALEA) to establish nationally recognized standards and require proofs of compliance. Private investigation has no equivalent body, leaving agencies

largely on their own to determine what "best practices" look like.

The time has come for a national professional body in the private investigation industry to fulfill that role. Such an organization could review agency policy manuals, audit compliance, and establish an accreditation process. Accredited agencies would not only demonstrate adherence to nationally recognized standards but also build trust with courts, clients, insurers, and the public. Much like CALEA does for police departments, this framework would create uniformity, accountability, and professional recognition across the field of private investigation.

CONCLUSION

At its best, a policy and procedure manual is not a bureaucratic burden but a force multiplier. It provides clarity where there could be confusion, safeguards where there could be liability, and culture where there could be drift. It keeps investigations lawful, ethical, and consistent, even when the unexpected happens.

Private investigators pride themselves on adaptability and resourcefulness. A well-crafted manual does not diminish that; it enhances it, giving structure to the areas where consistency matters most while leaving room for professional judgment in the field.

In short, agencies without a manual operate at unnecessary risk. Those with one enjoy not only legal and ethical protection but also the ability to deliver better service, scale with confidence, and build trust with clients and regulators alike. For an industry built on truth and integrity, the policy and procedure manual is not an option but a necessity. **PI**



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