

POST OFFICE LTD FRAUD INVESTIGATION AND PROSECUTION POLICY



**POST OFFICE LTD - SECURITY POLICY
FRAUD INVESTIGATION AND PROSECUTION POLICY**

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POST OFFICE LTD FRAUD INVESTIGATION AND PROSECUTION POLICY

1	INTRODUCTION 1.1 The Fraud Investigation Team sits within the overall Fraud Strand and its mission statement is: "To mitigate the threat of fraud against Post Office Ltd. In order to protect its People, Customers, Assets, Brand and Reputation".
2	PURPOSE & AIMS 2.1 POL handles large volumes of cash, conducts huge numbers of financial transactions and maintains information (customer and client), in the course of its business that is personal and confidential. It follows that POL must deserve and maintain the absolute trust of its customers, employees, suppliers and others with whom it comes in contact with. 2.2 POL requires all of its employees to act honestly and with integrity at all times, and to safeguard business and customer assets for which they are responsible, commensurate with business code of conduct and standards. 2.3 The risk of crime against POL is managed through a range of policy and procedural based controls, designed to identify, prevent, deter or disrupt potential targeted or opportunistic criminal activity affecting its operational pipeline of both Supply Chain and Branch Network. The investigation of crime is identified through trigger mechanisms, trend analysis or information received within or outside of the business. 2.4 The POL Fraud Investigation policy has been developed to support the principal and overarching Royal Mail Group Policy, but with specific reference to how POL deals with its specific risks faced. It also supports and promotes the business code of conduct and standards and facilitates effective controls that identify, prevent, deter and minimise or eradicate Crime. 2.5 POL will investigate with absolute impartiality suspected or detected crime against it, either using its own resources or where relevant in partnership with Group Security, police and other agencies. Where the level or volume of crime affecting the business exceeds its capacity to investigate, the Fraud Strand will maintain and apply principles for the prioritisation of criminal investigations, ensuring prioritisation in direct relation to their impact upon POL or society generally.

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3	<p>POLICY</p> <p>3.1 POL will investigate crime and suspected crime against the business, identify offenders, highlight factors that facilitated crime and take appropriate action and where appropriate including prosecution. (Where appropriate this will be in conjunction and support of Group policies and procedures).</p> <p>3.11 Protecting the Business</p> <p>Highlighting crime facilitators, investigations will identify (i) non-compliance with security and operational procedures, (ii) non-compliance with the code of business standards (iii) failings in management control and (iv) shortcomings in physical security.</p> <p>3.12 Policing Crime</p> <p>POL Investigation Teams are the providers of in-house investigations and will maintain the lead in all dealings with the Police.</p> <p>3.13 Conduct of Investigations</p> <p>The conduct, course and progress of an investigation will be a matter for the investigators as long as it is within the law, rules and priorities of the business. Investigators will ultimately report to the Head of Security with regard to the conduct of criminal investigations.</p> <p>3.14 Role of POL Employees</p> <p>POL employees are expected to maintain a high standard of integrity and whatever their position in the company, are expected to assist investigators with their inquiries. Employees have a duty to;</p> <p>(i) Report crime against the business to the Post Office's Network Business Support Centre at GRO Report suspicious incidents to Grapevine GRO or Crimestoppers on GRO even if the employee wishes to remain anonymous.</p> <p>(ii) Report to the company if they are charged, cautioned, summonsed or convicted in connection with any criminal offence.</p> <p>3.15 Procedures and Standards</p> <p>Criminal investigations will be conducted in accordance with legal powers, restrictions and guidelines provided by the government or governed by Royal Mail Group policies (ref 3.2)</p> <p>Procedures and Standards</p> <p>Adherence and Compliance to:</p> <ul style="list-style-type: none">• Police and Criminal Evidence Act 1984
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	<ul style="list-style-type: none"> ● Data Protection Act 1998 ● The Data Protection (Processing of Sensitive Personal Data) Order 2000 ● Regulation of Investigatory Powers Act (RIPA) 2000 ● Human Rights Act 1998 ● Criminal Procedures and Investigations Act 1996. ● The Code of Practice for the Management of Police Information when acquiring, retaining, storing and disclosing intelligence. ● Safety and Planning In accordance with The Management of Health and Safety at Work Regulations 1999 (using the PORA operational planning tool: Planned Operation Risk Assessment).
4	<p>PROSECUTION</p> <ul style="list-style-type: none"> ● England & Wales: Decisions to prosecute will be taken by nominated representatives in the business with consideration to the advice provided by the Royal Mail Group Criminal Law Team and where there is sufficient evidence and it is in the public interest. ● Scottish Law and Northern Ireland ● In Scotland the Procurator Fiscal's office will make all prosecution decisions on POL investigations. ● In Northern Ireland the office of the Director of the Public Prosecution Service will make all prosecution decisions on POL investigations.
5	<p>COMPLIANCE</p> <p>Reports of Incidents of crime or suspected crime are evaluated, categorised and prioritised for investigation by the Criminal Investigation Casework Teams.</p> <p>The Casework teams report on volumes of investigations, products, processes and services affected, and types of offences, offenders and outcomes of prosecutions.</p> <p>The Casework Teams monitor compliance with investigatory procedures and standards.</p> <p>Complaints will be investigated as per the complaints procedure.</p>
6	<p>MONITORING</p>

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	<p>Representatives from the Security Lead Team, Senior Fraud Strand leader and the Fraud investigation team leaders will review this policy at least annually and where required in line with Group Policy.</p>
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