



IDG: Speak Up & Investigations

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Aims

Speak Up

For POL to have a Speak Up culture which:

- * Staff, Contractors, Partners, Postmasters and their staff use to raise concerns regarding actions or behaviours/ wrongdoing in POL's operations
- * Is trusted by those using it
- * Is recognised top down as an important part of POL's good governance framework

Investigations

For POL to demonstrate that we have learned from the past re CIJ, HIJ and *Hamilton* in the conduct of investigations:

- That investigations are fair, transparent, evidence-led, lawful, respectful, disclosure-compliant
- Will follow evidence away from as well as towards the working theory

For POL to protect our operations by the effective use of investigations into:

- Potential losses of >£100k
- Allegations of misconduct by GE/Board members
- Enterprise-wide process failures where facts are not known



Strategy & Delivery

Speak Up

Two Year Strategy (develop following EY's review)

* Outreach

- Conduct a rolling programme of awareness team talks promoting & explaining Speak Up (inc manager awareness/ roles and responsibilities)
- Experience at POL and elsewhere shows an increase in reporting following team talks
- Coordination with strategic partners' Speak Up teams
- Postmasters & their staff to be included

*Continuous Improvement

- CPD events, connectivity to other Speak Up teams, periodic external assessments/reviews, feedback culture, legal developments such as EU Whistleblowing law, and assurance all feed a CI culture

Investigations

Continue to build an investigative target operating model

*Within the CIU

- Equip team with suitable tools
- Maintain and develop external contacts, particularly with law enforcement and prosecutors
- Deliver the strategic liaison approach to police investigations

*Within other teams

- Through assurance work, increase their capabilities and reduce risk
- By being an escalation point for criminal cases, assist other teams in reducing potential losses



What does success look like?

Speak Up (strategy being developed so below are proposed measures)

Quantitative

- PIDA-qualifying reports increase as a proportion of reports received year on year
- Number of reports increases by X% each year

Qualitative

- Feedback from reporters shows trust in the service

Investigations

- Investigations conducted in a judgement-compliant manner
- Risk is identified and managed by investigative findings being implemented
- Process and procedure improvements made from assurance work
- Criminal benefit recovered by the courts and returned to POL



Resource & Funding

Speak Up

*Current team of 1x Manager, 2x Integrity Investigators, & 1x Triage/Analyst

*Volume of cases requires Manger to run the complex and serious cases which distracts from strategic development and outreach impeding overall effectiveness

*An additional Integrity Investigator (c£42k incl NI etc) would give increased capacity for outreach and so increase risk awareness

Investigations

CIU

*Current team of 1x Head of CIU, 2x Senior Investigations Managers

*Current case load unsustainable with current team size – Head of CIU carrying case load so ToM development slowed

*Assurance work limited by capacity

*c£1m in identified losses not being investigated despite good evidence due to lack of resource

Other teams

*Postmaster-facing Retail teams unable to handle investigation volumes



Assurance

Speak Up

- Will form part of the Investigation assurance work from May 2023
- Cases will be assessed every two months against an agreed criteria to identify lessons learned as part of continuous improvement
- periodic benchmarking such as self-assessment against specialist NGO's criteria and peer organisations through engagement by the team

Investigations

- CIU assures some of the other investigative teams against an agreed set of criteria.
- Recommendations from assurance and investigations are reported to Compliance as well as local management for consideration and action.
- Additional teams investigative activities could be assured given additional CIU capacity
- Compliance assures CIU's activities
- Intent to have an external review of investigations carried out in 2024



Dependencies

Speak Up

- Success of outreach work to improve quality and quantity of reporting
- Establishing and maintaining an appropriately sized and skilled team
- Moving to a more effective case management system to better manage risks related to disclosure, operational effectiveness, confidentiality, case hand-offs between investigators/teams, and intelligence-gaps

Investigations

- Moving to a more effective case management system to better manage risks related to disclosure, operational effectiveness, confidentiality, case hand-offs between investigators/teams, and intelligence-gaps
- Sufficient specialist transaction analysis support either in CIU itself or within the Retail investigation teams to support the provision of complex statements of evidence to police
- An increase in numbers of investigators in CIU to make impact of case work strategically effective ie establish a deterrence effect as well as volumes of detections

Current Non-BAU delivery timetable (based on current resources)

Task	Target Date	Comments
30 Human Impact / P&P referral Merits Assessments	First tranche by mid-June 2023 Remainder throughout FY2023/24	New staff to be on-boarded throughout May and June 2023. Matters concerning current employees to form first tranche.
Case management system	Ready for use by end of Q1 FY2023/24	Funding secured already. Requirements were agreed in March 2023. Contract being completed.
Strategic relationship with City of London Police, PSNI, and Police Scotland	Agreements reached during Q3 FY2023/24	Objective to have a single referral point for criminal matters in each jurisdiction
Speak Up Two-Year Strategy	To be completed by end of June 2023	EY review now received. Recommendations to be considered for Strategy. Will include outreach plan.
Combined Investigation & Cooperation with Law Enforcement Policy active	End of Q2 FY2023/24	Draft has been reviewed by P&P. Next draft under way. Will require to go through RCC and ARC.