

Chapter 06 Retention of Papers



Outline Process for filing and retaining Branch Assurance Working Papers

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Introduction

It is the responsibility of the Contract Advisor or Senior Investigation Manager to contact the Lead Branch Assurance Advisor (BAA) they require the original paperwork from a BAV. In any event all paperwork must be retained in accordance with the retention policy below.

It is often the case that a BAV is requested because there are concerns regarding operation of a branch or there are concerns that POL funds are not being administrated/used correctly. As a result of a BAV POL have a number of resolution options available to them including but not limited to acceptance that no issue has been found, writing off of a deficit, additional training or guidance and support to the Postmaster and their staff, referral to a Contract Advisor which may in turn result a suspension and/or termination of a Postmaster, or where there are grounds to suspect a criminal offence may have been committed referral to the Central Investigations Unit.

Any kind of intervention which may culminate either immediately or future sanction action being taken by the Contracts Team or an investigation into an alleged criminal offence, places certain 'disclosure obligations' on POL (see appendix 'F' of the Investigator's Manual).

Section 31.2 of the Civil Procedure Rules 1998 applies to matters involving contractual issues and requires POL to provide to the other a party a schedule of all documents stating whether 'the document exists or has existed'. If the matter were to proceed in a civil court the other party is entitled to see all documents on the schedule unless the court rules otherwise and therefore, it is essential that such documents are retained.

In matters relating to investigations into an alleged criminal offence the Criminal Procedure Investigation Act (CPIA) 1996 requires POL to record, retain and reveal all 'relevant material'. Section 2.1 of CPIA defines material as:

'Material of any kind, including information and objects, which is obtained or inspected in the course of any investigation and which may be relevant to the investigation. This includes not only material coming into the possession of the investigator but also material generated by him'.

It is clear from the above that all reports, BAA notes and any other items of significance (other than cash, stock etc.) made or obtained during a BAV must be recorded and retained for possible future reveal.

While 'best evidence' will always be the production of the original document, due to the volume of work completed by BAAs it is acceptable to make a 'true record' of the original in electronic format and retain the same on SharePoint. The paperwork will be stored for seven years in the Oasis Archive.

The BART electronic Microsoft Excel form, when completed, holds most of the information that needs to be retained following an BAV. They are stored on a SharePoint and this has therefore considerably reduced the amount of manual paperwork.

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Original paperwork supporting an BAV will from time to time be required for a variety of purposes (e.g. presentation at court during legal proceedings), and for this reason a policy of retaining such paperwork has been introduced.

This policy covers the retention of manual documentation arising from BAV activity; stating periods of retention, detailing storage arrangements, retrieval instructions, and destruction.

All BAV papers are to be retained by the lead BAA and held for a period of 60 days, within that 60 days the signed working papers must be scanned electronically and uploaded to the on-line storage centre sensitive materials. This process is outlined below. This allows for any immediate post-branch assurance visit queries to be raised and answered without delay.

Section 1- Standards for the Retention of Branch Assurance Visit Papers

- 1.1 All BART's (electronic Microsoft Excel forms) to be retained on SharePoint for at least seven financial years following the year in which the BAV was undertaken. Electronic files to be deleted from laptops once confirmed on network server. However, in the event that sanction action is envisaged all material must be retained until:
- a) The decision is taken not to proceed against the individual (in a criminal court, seek civil recovery or all appeal rights against a decision to terminate a contract have been exhausted/or are time barred);
 - b) The individual is acquitted;
 - c) The individual is convicted;
 - d) The prosecutor decided not to proceed with the case;
 - e) The individual is released from custody (following conviction);
 - f) The individual is discharged from hospital (where the court imposes a custodial sentence or a hospital order);
 - g) Six months from the date of conviction;

Whichever is the latter.

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1.2

Events requiring investigation may include:

- Suspension of Postmaster
- Misuse of funds
- Unexpected discrepancy greater than £1000
- Admission of, or suspicion of, false accounting or theft
- Irregular personal cheque on hand
- Credit sales
- Instances where unfamiliar circumstances are encountered. In these cases, a decision to destroy or retain should be made following discussion with the Security Team.

1.4

The 'material' that must be retained should include but not limited to the following items:

- The signed working papers.

1.5

The documentation included in any Quality Assurance Review (QAR) must be retained by the Branch Assurance Team Leader completing the QAR for a period of 7 years following the completion of the QAR. This will ensure evidence is retained for possible use when completing the Personal Development Review (PDR) or if QAR results are subsequently questioned. It also allows documentation to be retained for external audit purposes, if required.

Section 2 – Lead BAA Responsibilities

2.1

Ensure that all manual documentation is necessary and not excessive.

2.2

Ensure that standards outlined in Section 1 are adhered to.

2.3

Ensure the BART and CAT Tools are submitted, within 3 days for storage on SharePoint, and deleted from laptop once transfer is confirmed.

2.4

Notify your Team Leader of any irregularities during BAV.

2.5

After 30 days and before 60 days the signed working papers must be scanned and stored electronically for seven years. The documents will then be destroyed unless requested for an investigation.

2.6

Record the BAV date, branch name, and branch code as the file name for these documents,

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Section 3 – Branch Assurance Team Leader Responsibilities

- 3.1 If a Branch Assurance Team Leader is designated as the lead, their responsibility is as described above.
- 3.2 Monitor the supporting documentation retained using the QAR and 1-2-1 processes, and ensure QAR's are performed within 60 days of the date of the BAV.
- 3.3 BAV papers on which a QAR has been performed are to be retained by the Branch Assurance Team Leader completing QAR for a period 7 years and then shredded.
- 3.4 Ensure that direct reports are aware of the standards and their responsibilities, and that they are properly equipped (i.e. either be provided with, or have access to a shredder).
- 3.5 Monitor the supporting documentation retained using the Quality Assurance Review (QAR) and 1-2-1 processes and ensure QAR's are performed within 60 days of the date of the BAV.
- 3.6 Ensure that expired documentation is destroyed using a shredder.
- 3.7 After 30 days and before 60 days the working papers are scanned and stored electronically for seven years. The documents will then be destroyed unless requested for an investigation.

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Document Admin

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Purpose	Outline process for filing and retaining Branch Assurance Visit papers
Audience	Branch Assurance Team
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Stakeholders

Stakeholders Name	Responsibility
Mike Lowe Nayan Navik Andrew R Morley	Head of Operational Excellence Branch Assurance Manager Senior Investigations Manager

Responsibilities in change

Role	Job Title(s)	Date
Author	David Nolan – Branch Assurance Team Leader	
Assurance	Mehl Singh – Branch Assurance Team Leader	
Authorised	Nayan Navik – Branch Assurance Manager	
Communication	Recorded in Knowledge Centre	

Version control

No	Reason for issue	Section No.	Date	Approval
1.1	Reference to Event capture form removed form no longer used Remove reference to Loss prevention	Introduction All	27/10/2020	
2.0	Update with Service & Support Optimisation	All	12/1/2021	
3.0	Removed Audits, auditors, A & SA & National Area Audit Manager	All	05/06/2023	
3.1	Change Security Manager to Contract Advisor and amend reference to Security Team to Team Leader	All	9/6/2023	
4.0	Amendments made to reflect obligations as set out in s31 of the Civil Procedures Rules 1998 and Criminal Procedures Investigation Act 1996.	All	13/06/2023	

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5.0	Retention of paperwork process updated	2.5 3	15/5/2024	
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