



Assurance & Complex Investigations

Quality Assurance Framework Report

March 2024



Introduction

Introduction

- This report covers quality assurance reviews conducted in February and March 2024.
- It highlights common themes/shortfalls identified during the bi-monthly quality assurance reviews undertaken by A&CI on investigations conducted by the assured teams and makes recommendations to address the same.
- Individual scoring sheets for the files reviewed during the reporting period have been shared and discussed with team managers outside of this report.
- Any training shortfalls identified during reviews have been discussed with team managers and training/mentoring offered/provided.
- Analysis of investigative skills, knowledge and quality of investigation files within the assured teams are summarised in the report and trend analysis provided.



This Month

Headlines

- Testing was completed in the Contracts Team, Network Monitoring Team and the Network Resolution Team during this review period. No testing was completed in the Branch Reconciliation Team as the team did not restart investigative reviews insufficient time to be captured by this report, however, this will be captured in the next review.
- It is pleasing to see that there were no additional recommendations in the Network Monitoring Team and the team are now in the main generally complaint with all tests conducted as part of this review, with points lost for minor errors and omissions.
- It is also pleasing to see that many of the aged recommendations have now been cleared during this review period.
- While there are more recommendations than normal in the Network Resolution Team, this is because the team have adopted a revised process as part of Lottery exit programme which requires some amendments to the strategy. The team should be commended for achieving their highest score to date, demonstrating continued and ongoing progression. Well done to everyone in the team with a particularly mention to team manager Tracy Bannister who has been driver in getting the team to the high standards demonstrated in this report.

Definitions of priorities used in QAF reporting.

Priority	Definition
HIGH	A recommendation is rated as 'High' priority when the Quality Assurance review identifies material weaknesses in operational processes or the non-adherence to operational processes which could lead to POLs inability to evidence that processes have been applied as designed with no gaps in record keeping.
MEDIUM	A recommendation is rated as 'Medium' priority when improvements in operational processes and record keeping have been identified. Changes applied as a result of these recommendations will strengthen operational processes as well as providing assurance that processes are working as designed.
LOW	A recommendation is rates as 'Low' priority where improvements could be made to processes and procedures to improve outcomes of activities.

Network Resolution Team (Tier 2/Tier 3) (Tracy Bannister/Simon Worboys)								
No.	Observation	Recommendation	Rationale	Priority	Date of Rec.	Assured Team Response	Status of Response	Anticipated Closure Date
RMHO 1/24	Various versions of the Postmaster Support Policy - Accounting, Dispute Resolution in circulation. The T2/T3 Teams site contains version 3.0. Version 3.2 of the same policy is available on POL's 'The Hub'. The version on The Hub refers to De Minimis as being £500.00. Enquiries conducted with The Network Resolution Operations Manager indicate that the current De Minimis is £1,000.00. At Section 4.1 of the Policy under the heading of Tier 2 (final bullet point), there is a reference to Appendix 9.1, there is no Appendix 9.1 (suspect the reference should be to Appendix 8.1).	The Policy is reviewed to ensure that references in the Policy remain valid. The Policy is updated on the T2/T3 Teams site to reflect the latest version of the Policy, including the current De Minimis. Consideration is given to either redacting the De Minimis value recording in the Policy available on The Hub, or removing the Policy from The Hub.	To ensure consistency of approach when conducting reviews and transparency it is important that the policy is up to date and reflects the latest approved approach and thinking and that all references remain valid. De Minimis i.e. the upper value at which a deficit will be routinely considered for write off is operationally sensitive material and could have financial implications for the business if this figure is in general circulation.	High	26/03/2024	The central repository for all PM policies are on the branch hub, however PDF copies are placed on the teams site for ease of reference, 3.2 version is now available on the teams site. The policy will be updated as per the yearly policy review which starts every year in May and published in June. Jo Milton and Tracy Marshall are the owners of all PM policies The DM level changed between policy reviews from £500 to £1000. The amount referenced in the policy is not the DM limit. It is a two bullet line of principles applied by Triage to determine if a DM limit should be applied to the case. The DM limit is purposefully silent so as to be able to flex up or down depending on volumes / unit costs. Standard application in dispute resolution processes. However, Simon W annually reviews the policy with Jo Milton. Simon has already noted to make amends to make this clearer by removing a monetary value. The next annual policy review cycle begins in May, therefore this recommendation is already in progress as part of annual reviews/controls.	In Progress	30/06/2024
RMHO 2/24	The Lottery Team within Tier 2 are currently conducting a focused review as part of POL's exit from the National Lottery. As such, the team are not conducting a full Tier 2 review as set out in the Postmaster Support Policy - Accounting, Dispute Resolution and the current Investigation Strategy.	The decision to conduct a focused review should be recorded, this could be achieved by either: 1) A Lottery review specific policy making it clear what checks will and will not be performed by the T2 Lottery Team, or, 2) The Decision and Action Log for Lottery cases is updated to record the revised approach being adopted and the reason why only limited enquiries will be pursued.	The business is exiting its arrangement with the National Lottery and where a discrepancy relating to National Lottery is identified T2/T3 are tasked with performing a focused investigation. It is important that this change in strategy in such cases is recorded as without such a record, it appears that T2 are not compliant with their own policy and strategy.	High	26/03/2024	The team are conducting a full review of these cases, specific to lottery and complete T2 reports. In addition the team include wording in the report that this review relates solely to scratchcards. The project team were also involved in this process. As this is an exit programme we agreed to deal with cases in the spirit of our own process and did not require a specific lottery policy as it is a short term programme. The process we follow has been shared and agreed with the project team who have also provided guidance in how to deal with specific cases. The volumes have been lower than predicted and will shortly cease. We worked collaboratively with all other teams doing lottery investigations, who do not have separate policies or separate strategies, so rejected option 1 recommendation as not required. However, although the lottery dips have been inconsistent across teams, I will accept point 2 recommendation and we will start putting the wording that is already in the body of the lottery reports "this review relates solely to scratch cards" and note this in the decision and action log.	In Progress	05/04/2024

Network Resolution Team (Tier 2/Tier 3) (Tracy Bannister/Simon Worboys)								
No.	Observation	Recommendation	Rationale	Priority	Date of Rec.	Assured Team Response	Status of Response	Anticipated Closure Date
RMH0 3/24	Unable to access/locate the Postmaster Support Policy and Investigation Strategy as referenced in the T2/T3 investigation report.	A hyperlink is provided in the T2/T3 Investigation Report template to the Postmaster Support Policy and Investigation Strategy. Access controls to the Postmaster Support Policy and Investigation Strategy is set so that anyone with the link can access the same.	Currently and with a few exceptions, only those working in T2/T3 have access to the Investigation Strategy. As a result, anyone reviewing the investigation file either now or in the future outside of T2/T3 will not be able to access the Investigation Strategy.	Medium	26/03/2024	Partially accepted/partially rejected there is not a drop down for this. AM confirmed to use option reject. Accepted The policy is held on the branch hub central repository and a PDF version on the MS Teams Tier 2 site. The central repository for all PM policies are on the branch hub, however PDF copies are placed on the teams site for ease of reference, 3.2 version is now available on the teams site. Rejected Adding the hyperlink of the investigation strategy would confuse Postmasters. The investigation strategy underpins/ links to the official Postmaster Accounting Dispute policy V3.2. Adding the hyperlink has been discussed previously with A&CI (Oct 2023) and we agreed not to include the link in the report as it would confuse PM's, we agreed to add the strategy paragraph into the report, with the strategy document for internal use stored in the teams files for reference, which is where it can be viewed.	Rejected	
RMH0 4/24	Scratch card Tool in use to reconcile scratch card transactions throughout the report involving scratch cards. No reference in the report that Scratch card Tool results are referenced back to source data	An explanation is provided in the investigation report setting out how the output from the Scratch card Tool is referenced back to source data and how only source data is used for decision making.	In the interest of transparency and just outcomes it is essential that only source data is used for decision making to avoid decision being made on false or misleading data outputs.	High	26/03/2024	Source data is used and attached to the dynamics case, so no issue. The Horizon data is placed in an excel spreadsheet which adds up the value of scratchcards, rather than manually adding up. Wording in the report to reflect this. However in addition , we can add a further sentence "Results from the scratchcards excel spreadsheet are compared against source data and where both datasets reconcile no further verification is undertaken. In the event that the datasets do not reconcile then source data is interrogated to identify the reason for the discrepancy and the findings recorded in the report.	In Progress	05/04/2024

Network Resolution Team (Tier 2/Tier 3) (Tracy Bannister/Simon Worboys)								
No.	Observation	Recommendation	Rationale	Priority	Date of Rec.	Assured Team Response	Status of Response	Anticipated Closure Date
RMH0 5/24	Decision and Action Log not completed. Report reviewed by Line Manager 13/02/24, Line Manager authorised the report despite Decision and Action Log not completed. This is a part repeat of recommendation RJ01/24	Team are reminded on the importance of the completion of the decision and action log at the time a decision is made. Line Managers should confirm that the Decision and Action Log has been fully completed prior to authorising report. If a report is received by a Line Manager where the Decision and Action Log has not been completed then the report is returned to advisor to rectify.	Failure to record key decisions and subsequent actions will leave both the Investigating Officer and the investigation itself open to challenge as to why the officer followed certain lines of enquiry but failed to follow others etc.	Medium	26/03/2024	Out of the 7 cases dipped in March 2024, only 1 case did not have the decision and action log completed, however the issue was the support advisor did not upload the report version with the completed D&A action log which has since been corrected. Noted, will comms a reminder in next team huddle as a reminder, the line managers do reject any reports that do not have a D&A log completed, this is already a control in place, the issue was the incorrect version was uploaded to dynamics, which has been rectified.	Implemented	28/03/2024

Contracts Team (David Southall)								
No.	Observation	Recommendation	Rationale	Priority	Date of Rec.	Assured Team Response	Status of Response	Anticipated Closure Date
RMHO 7/24	Communications with Postmaster via WhatsApp. WhatsApp messages not uploaded to the case file at the earliest possible opportunity. WhatsApp messages only visible to the Contracts Advisor in the case and the PM and not the wider case team. WhatsApp messages which are potentially disclosable, not being retrievable due to a problem with the Contract Advisor's phone.	Until such time as POL issues further guidance on the use of WhatsApp when communicating with Postmasters the following protocols should be adopted: 1) The use of WhatsApp should be discouraged and communications with PM routed via a POL email address. 2) Any decision to use WhatsApp when communicating with PM to be authorised on a case by case bases by Head of Contracts. 3) Communication between Contracts and the PM via WhatsApp must be restricted to a POL mobile phone. 4) Communications between Contracts and a PM via WhatsApp must be downloaded at the end of each working and saved to the case file.	While WhatsApp does provide a useful means of communication, when used in an investigative setting it does present security, data governance, disclosure and investigation management challenges. Security - While WhatsApp does provide end to end encryption, if the phone containing the messages is lost or stolen, and particularly if the phone is not password protected, sensitive POL data may be compromised. Data Governance - if the event that POL receives a DSAR or FOI request, the DPA team may need to search mobile phones to ensure respondent data is capture data. Disclosure - There is an obligation in both civil and criminal investigations to retain and record all relevant material, this includes communications on WhatsApp. Failure to comply with such obligations may expose Contract Advisors to a potential charge of perverting the course of justice. Investigation Management - It is imperative that all members of the wider case team have access to all relevant material in the case when making decisions relating to the matter under investigation. Sending and receiving electronic communications via a POL email address would resolve many of the issues highlighted above and therefore, the use of WhatsApp should be discouraged.	Medium	12/03/2024	Update (21/03/2024) - agree with the recommendation, although a wider business use policy needs to be considered. Happy to adopt the following: 1) I have discouraged the use of WhatsApp and that email comms be used as far as possible. 2) The team will agree with me on its use. 3) Communication are already restricted to a POL mobile phone and personal phones are not used 4) A copy of any WhatsApp communications are kept on the 'contact log' maintained by the team	Implemented	21/03/2024
RM08 /24	While the conclusion is highlighted in the case resolution on dynamics and various documents can be identified in the case to explain what has happened, the description of the case, on Dynamics, has been left blank. Therefore, while looking at the Dynamics log for the case, it can be concluded that the PM has been reinstated and from what date, but there is no indication of why the PM was suspended in the first place unless all the attached documents are read.	All relevant fields completed in Dynamics.	Following a case from inception to conclusion in Dynamics is challenging. Failure to complete all relevant fields in Dynamics only exasperates these challenges and results in the reader having to review numerous documents to understand what has occurred in the case and why. This is time consuming and can be avoid if all relevant fields are fully completed.	Low	12/03/2024	New case management reporting tool process in Dynamics being designed for the contracts team, part of which will hopefully pick up on this requirement. Aim to have in place by end of Q4 with full training to the team on use and roll out in P1 (2024/2025). Once in place if any further work is needed to meet requirement then happy to talk through	In Progress	30/04/2024

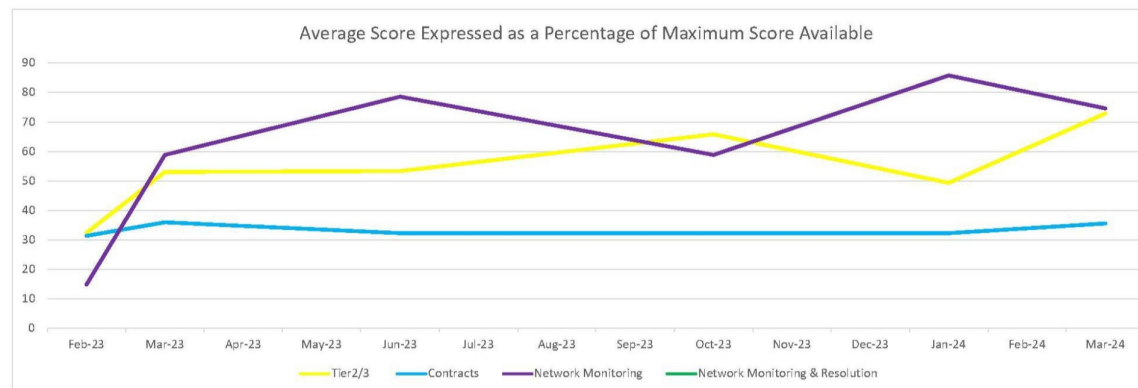
Network Monitoring Team (Dawn Quick/Alison J Clark)								
No.	Observation	Recommendation	Rationale	Priority	Date of Rec.	Assured Team Response	Status of Response	Anticipated Closure Date
		No recommendations in this reporting period.						

November & December 2023 Scorecard

Network Resolution Team (Tier 2/Tier 3)								
	Points Available	CAS-3280607	CAS-3309597	CAS-3304452	CAS-3184667	CAS-3266990	CAS-3168859	CAS-2977022
Receipt of Notification/Referral	11	8	8	9	9	11	11	11
Commencing an Investigation	11	7	3	6	4	5	6	5
Weekly Review	24	22	7	16	9	12	15	14
For Cases Still Open	6	6	6	6	6	6	6	6
Interviews (to Include Fact Finding Calls Conducted with Postmasters)	10	7	5	8	6	10	8	6
Closure	3	1	3	3	1	3	3	1
Closure Report	9	7	7	7	5	7	7	7
Total	72	58	39	55	40	54	56	50

Network Monitoring							
	Points Available	CAS-3282218	CAS-3223498	CAS-3250307	CAS-3209546	CAS-3152352	CAS-3266111
Initiating Investigation	7	6	6	6	3	5	5
Conducting the Investigation	19	17	14	9	17	12	15
Interaction with Postmaster (to Include Fact Finding Calls conducted with Postmasters)	9	9	8	2	9	8	9
Case Closure	7	5	4	3	5	5	6
Total	42	37	32	20	34	30	35

Contracts Team							
	Points Available	CAS-3180270	CAS-3103725	CAS-3044848	CAS-2999117		
Receipt of Notification/Referral	2	0	2	2	0		
Commencing an Investigation	9	2	2	2	2		
Monthly	20	2	4	2	8		
For Open Cases (if the case is closed score 5)	5	5	5	5	5		
Interviews (to Include Fact Finding Calls Conducted with Postmasters)	11	0	1	1	0		
Closure	3	3	3	3	-1		
Closure Report	8	6	6	6	5		
Total	58	18	23	21	19	0	0



Recommendation Tracker									
No.	Team	Observation	Recommendation	Rationale	Priority	Date of Rec.	Summary of Assured Team Response/Progress towards Implementation	Status of Response	Anticipated Closure Date
RF10	Contracts team	In a 100% of the cases reviewed this month the Contracts Team opened a new case in Dynamics and did not adopt the Dynamics case from the previous team.	When a case is transferred from another team the Contracts Team adopted the previous Dynamics case number.	The opening of a new case in Dynamics every time a case transfers from one team to the next makes it challenging to follow the progress of the investigation and is likely to lead to disclosure issue should the case be challenged/appealed or result in court action.	Medium	28/02/2023	New case management reporting tool process in Dynamics being designed for the contracts team, part of which will look to pick up on this requirement. Aim to have in place by end of Q3. Update (09/01/24) - deliver now pushed back to the end of Q4 Update (13/03) - still on track to have in place by end of Q4 with full training to the team on use and roll out in P1 (2024/2025).	In Progress	31/12/2023
RF12	Contracts team	No record of how the case team intends to deal with issues such as evidence collection, contact with key witnesses etc.	Introduction of Investigation Strategy	Failure to have a clear strategy of how the investigation will be managed may lead to certain lines of enquiry not being followed or evidence gathered being lost or not being admissible.	Medium	28/02/2023	Postmaster Support Policy sets out principals behind the work the Contracts Team do. Update (31/01/24) - revised case summary, decision rationale and document storage being worked through (see note below) for implementation by the start of the new financial year. Plan is to incorporate a strategy, decision log and meeting preparation note (a consistent method for the team to understand what they want to get out of a meeting with a postmaster) will be incorporated into this review. Update (13/03) Still on track for deliver by end of financial year (with use from P1 onwards)	In Progress	28/02/2024
RF13	Contracts team	No record of key decisions made during the course of the investigation and resulting actions.	Introduction of an Action and Decision log.	Failure to record key decisions and subsequent actions will leave both the Investigating Officer and the investigation itself open to challenge as to why the officer followed certain lines of enquiry but failed to follow others etc.	Medium	28/02/2023	Update (31/01/24) - revised case summary, decision rationale and document storage being worked through (see note below) for implementation by the start of the new financial year. Plan is to incorporate a strategy, decision log and meeting preparation note (a consistent method for the team to understand what they want to get out of a meeting with a postmaster) will be incorporated into this review Update (13/03) Still on track for deliver by end of financial year (with use from P1 onwards)	In Progress	31/03/2024
RF14	Contracts team	It is clear from the files reviewed that Contract Advisors are conducting their own enquiries and building evidence packs. On completion of their investigation the Contract Advisor then makes a decision as to the outcome i.e. no case to answer, suspension of Postmaster, termination of the contract. While the decision is ratified by management it is the case that Contract Advisors are fulfilling the role of both investigator and decision maker.	Contracts Team fulfil the role of adjudicator making decisions based on evidence packs and reports produced by other teams.	It is a fundamental principal of justices in the UK that those charged with making decisions on the outcome of investigations are independent of the investigation process. While in a commercial organisation such as POL it is not always practical to have a completely independent decision maker, the segregation of duties will go some way to achieving this aim.	Medium	28/02/2023	Ongoing conversations about how this would work (noting the significant structural change this would carry). In the meantime it is noted that a Termination Decision Committee is being established who will be responsible for the decision to terminate an Agreement.	In Progress	31/03/2024

Recommendation Tracker									
No.	Team	Observation	Recommendation	Rationale	Priority	Date of Rec.	Summary of Assured Team Response/Progress towards Implementation	Status of Response	Anticipated Closure Date
RM12	Contracts team	Contract Advisors conduct sometimes length and comprehensive fact finding interviews with PMs. There is no evidence on file that an interview plan is produced prior to call.	Prior to conducting an interview an Interview Plan (see section 8.1 Investigator's Manual) is produced. The plan is disclosable and should be retained in Dynamics.	A comprehensive interview plan will ensure that all lines of enquiry/fact finding are covered in sufficient detail to meet the objectives of the interview/investigation. It will aid the investigator in identifying gaps in understanding/evidence and will encourage the investigator to consider possible defences and what evidence is available to support/undermine the possible defence. An interview plan is 'relevant material' and therefore, must be retained and recorded in Dynamics.	Medium	29/03/2023	This makes sense, but we would need support to understand what an interview plan should look like and include any best practice advice you can offer - support not received on this. Update (31/01/24) - Meeting preparation notes being developed for a consistent method for the team to understand what they want to get out of a meeting with a postmaster, including the need that what we cover at meetings should mirror the questions that are asked in our rationales. This then extends to the meeting invite letters and being clear to postmasters on the areas to cover (noting that the purpose of the meeting is to "to establish facts and gives the postmaster the opportunity to identify and answer any issues of concern". Update (13/03) Still on track for deliver by end of financial year (with use from P1 onwards)	In Progress	31/12/2023
RJ01	Service and Support	<i>When dealing with investigations, teams focusing purely on their area of responsibility with no one person having an overarching view/responsibility for the conduct of an investigation from inception to completion, leading to:</i> <i>No overarching strategy across the whole of the retail teams as to how this investigation will be conducted.</i> <i>In some cases, ineffective handovers between teams and cases not reaching their conclusion i.e. cases slipping between the gaps.</i> <i>Lack of understanding/appreciation of disclosure obligations.</i> <i>Volume of work regularly cited as reason why professionally recognised investigative processes not followed.</i> <i>In the event of a case appearing before an Inquiry in the future, impossible to identify a single Investigating Officer.</i>	Single dedicated Case Manager to oversee investigation from inception to completion across the whole retail team.	The conveyor belt approach to investigations with each team completing their action and then handing the case to the next team leads to lack of ownership with no one individual having a comprehensive understanding of the matter under investigation. This silo approach to investigation, the use of unrealistic deadlines linked with management focus on quantity and throughput of cases exposes POL to risk of allegations of breach of CPIA 1996 Code of Practice para 3.5 i.e. failure to follow all reasonable lines of enquiry which in turn may lead to miscarriage of justice.	High	30/06/2023	NSR Response: We already do this, own the case to completion and our understanding has always been where a case has any suspicion of criminal activity, the case is escalated into the team with the specialist e.g. CIU. If senior management agree to this then it would need to be changed and managed accordingly. Note that all T2 and T3 cases are owned by the analyst who is investigating and they would reach out to teams for more specialist information e.g. Stock, Network Monitoring, Branch Assurance Visit etc. So the analysts are not working in silo, they work collaboratively with the relevant teams so not sure where this observation has come from. To be clear the service level is 70% cases resolved in 20 days. The 10 day is a touchpoint to determine next steps e.g. more work required on report, escalate to tier 3, or send to weekly committee. The new SLA (inflight) is in the assurance document that has been shared with compliance. Further context has been added to the new service level including RAG status of aged position and this has been presented as a recommendation for the CIJ assurance piece administered by compliance. Therefore the expectation is to move the service level in line with other schemes subject to approval by senior management. Based on our handling average time across the tiers an 8 week service level would be reasonable, achievable and still give the team a stretch. We support Postmasters, provide the data to the Postmaster and feedback the outcome of the findings by means of T2/3 report. Throughout the investigation we may talk to the Postmaster or authorised individuals regarding their version of events so we have a balanced view when making a decision. Under the contracts process, we support the contract advisor in the provision of data or analysis as to the potential cause of a discrepancy. Currently we are removed from the Postmaster interaction to avoid inadvertently tipping off due to the potential that the Postmaster maybe suspended following the review. For 2024 we have determined that we will not alter the SLA or associated metrics / ways of working. Monitoring will continue and once the aged position is cleared we will review the situation again.	In Progress	31/01/2024
RJ07	Contracts team	Multiple CAS numbers for the same case including a new CAS number for a BAV. While it is acknowledged that the issue of multiple CAS numbers is being addressed, this work is in train and remains unresolved at the time of writing this report.	That one CAS number remains with the case from inception to conclusion.	The use of multiple CAS numbers makes it extremely challenging to follow a case from inception to conclusion. This challenge is exacerbated by the conveyor belt approach to investigations adopted by POL with each team completing their own area of responsibility before handing to the next team which in turn leads to silo working.	Medium	30/06/2023	New case management reporting tool process in Dynamics being designed for the contracts team, part of which will look to pick up on this requirement. Aim to have in place by end of Q4' Update (13/03) - still on track to have in place by end of Q4 with full training to the team on use and roll out in P1 (2024/2025).	In Progress	31/03/2024

Recommendation Tracker									
No.	Team	Observation	Recommendation	Rationale	Priority	Date of Rec.	Summary of Assured Team Response/Progress towards Implementation	Status of Response	Anticipated Closure Date
RO09/ 23	Network Monitoring	Lines of enquiry pursued resulting in an entry in the corresponding box in the NM checklist. However, it is often not clear (to non-team members) what is the consequence of the finding i.e. does the finding indicate there may be an issue or does the finding indicate there is not an issue.	Having completed a line of enquiry and entered the finding in the corresponding box on the NM checklist, the Support Advisors should record how this finding impacts on the investigation, does it support the investigation or does it point away from the investigation?	It is important that if someone independent of the NM team (an Inquiry for example) were to review the case file that they could understand the outcome of each line of enquiry and how this impacts on the overall case.	Medium	12/10/2023	From our recent findings and Rationale Document Monitoring, feedback has been provided to the team members to help improve the content and reasoning behind their decision. We have plans in place to provide ongoing coaching, training to help the team. 28/11 - Process guides provide suggested standardised wording for each topic, or a 'no issues' comment. Rather than the team add a reason for each line of enquiry, would a generic description of each issue on a separate tab of the checklist help? Andy to review this process during the February checks and sign off if acceptable	In Progress	28/02/2024
RO14/ 23	Branch Reconciliation	In a 100% of cases dip sampled there was no evidence of a management checking files before the investigation is closed.	Line Manager should conduct a quality check of files and should record that the check has been performed along with any case direction in the Activity Pane in Dynamics	Line Manager checks of the progress of the investigation and upon completion of the investigation are essential to ensure quality control and that any observations and direction provided are captured. This is a quality assurance check and not performance management. When a management check has been performed this should be noted by means of a case note in Dynamics.	Medium	12/10/2023	Consideration will be given on how we quality assure in this team 24/01 CM - Ollie to add an activity to all cases that he has reviewed on Dynamics to give the outcome of the Dip test. Update OF 08/03/2024 - Work has restarted and cases will be sent to AM at the end of March for dip testing	In Progress	30/11/2023
RJA12 /24	Contracts team	Ineffective handover of case leading to failure to recover funds from PM. On the 27/7/23 PM told the Contracts Team he would repay circa £242k in a timescale of 3-4 weeks. The case was not referred to PAST in Dynamics and therefore, this offer was not followed up and as at 22/12/23 no contact has been made with the PM regarding repayment and the full amount remains outstanding.	A comprehensive review of any procedure between the Contracts Team and PAST that relate to offers to pay received from PM. If no such procedure exists, then a procedure is put in place setting out how the Contracts Team/PAST will respond to offers to pay.	Ineffective communications between the Contracts Team and PAST is likely to result in missed opportunities to recovery funds due to POL.	High	19/01/2024	Agree that lines in and out of the team (not just with PAST) need to be clear so we're comfortable that when something is handed across it will be dealt with. Time to be put in with the relevant department heads. Update 13/03 - workshop with Mike Lowe, Simon Worboys, Alison Clarke on the 13 March to start working through flows in and out of teams. On this point in particular instruction has gone out from Head of Contract Management & Deployment to team. HoCM&D will also monitor following any decision taken to ensure the right teams have been engaged with and any PAST requests followed through on.	In Progress	31/03/2024
RJA14 /24	Contracts team	Rational Documents in excess of 50 pages long with no Executive Summary, requiring the reader to read the whole report to gain an understanding of the whole case.	An Executive Summary is introduced to all Rationale Documents.	If a member of the divisional management team or executive wishes to familiarise themselves with a particular case, currently they have little alternative but to read a lengthy and complex report which can take several hours when they only need a high-level understanding of the case. An Executive Summary allows management to familiarise themselves with a case in a relatively short period of time when just a high-level overview is required.	Low	19/01/2024	Executive summary to be introduced as part of the Termination Decision Committee so then can have an overview of the matter as part of their review. Update (13/03) - executive summary document drafted for use, still on track for delivery	In Progress	31/05/2024

Recommendation Tracker									
No.	Team	Observation	Recommendation	Rationale	Priority	Date of Rec.	Summary of Assured Team Response/Progress towards Implementation	Status of Response	Anticipated Closure Date
RJA16/24	Contracts Team	CAS-3019110 Breach in continuity of evidence. Lack of evidence on file. No Tier 2/3 report obtained. No KEL check. Leading to potentially unsafe decision to terminate contract. No recovery of alleged misappropriated POL funds.	1) All relevant material uploaded to case file. 2) Obtain a Tier2/3 report to include a KEL check. 3) All outstanding lines of enquiry to be concluded. 4) An independent review of the evidence available and the decision to terminate this contract. 5) If following a review of the evidence available in this case a conclusion is reached that the original decision is safe, then action is commenced to seek recover of POL funds (as offered by former PM). 6) If following a review of the evidence available in this case a conclusion is reached that the original decision was unsafe, then restorative actions are taken. 7) To ensure the independence, transparency and good governance of decisions to terminate a contract, such decision are taken by panel.	There is a lack of evidence on the case file and outstanding lines of enquiry. The decision to terminate appears to rely heavily on the account of the IO and not evidence. As such, there are concerns that the decision to terminate this contract may be unsafe.	High	24/01/2024	As a general note I disagree that an independent review of the evidence is needed noting that [REDACTED] and b) the postmaster challenged the decision with the decision to terminate being upheld by the Decision Review Panel (which is chaired by a former postmaster and has a former postmaster on the panel). To answer each point in turn: 1) All relevant material uploaded to case file. Proposal is to introduce a new document management system to replace the case summary document (which is a word document) whereby all documents that the Contract Advisor has been provided will be uploaded to a SharePoint site relevant to that branch. The decision rationales completed by the Contract Advisor will then include a hyperlink to the relevant folder on the site (as well as individual hyperlinks to the documents referred to in the rationale so everything is stores in one place). I will retrospectively work with the Contract Advisor to see that this is done. 2) Obtain a Tier2/3 report to include a KEL check. As above, a Tier 2/3 report will be requested if discrepancy related. Horizon checks are conducted as part of a Tier 2/3 review. Again though I will request that it is done for this branch. 3) All outstanding lines of enquiry to be concluded. Agree there is a need to ensure that all actions have been closed down and I will retrospectively work with the Contract Advisor to see that this is done. 4) An independent review of the evidence available and the decision to terminate this contract. As above, I don't agree this is necessary. Going forward this independent review will be introduced as part of the Termination Decision Committee (who will have access to both the decision rationale and supplementary documentation) 5) If following a review of the evidence available in this case a conclusion is reached that the original decision is safe, then action is commenced to seek recover of POL funds (as offered by former PM). We need to separate a decision to terminate a postmaster's agreement with a decision to seek recovery - they are separate processes managed by separate team. The decision taken to terminate the Agreement had a sound basis - postmaster admitted to using over £200k of Post Office funds to make improvements to the retail side. Whilst I accept there are gaps (making sure PAST are engaged, closing down all actions) I disagree this was an unsafe decision. 6) If following a review of the evidence available in this case a conclusion is reached that the original decision was unsafe, then restorative actions are taken. As above 7) To ensure the independence, transparency and good governance of decisions to terminate a contract, such decision are taken by panel. Will be introduced as part of the Termination Decision Committee A&CI 08/02/24 - Team invited to identify evidence of alleged admission on the case file.	In Progress	31/05/2024

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RMH0 1/24	Tier 2/3	Various versions of the Postmaster Support Policy - Accounting, Dispute Resolution in circulation. The T2/T3 Teams site contains version 3.0. Version 3.2 of the same policy is available on POL's 'The Hub'. The version on The Hub refers to De Minimis as being £500.00. Enquiries conducted with The Network Resolution Operations Manager indicate that the current De Minimis is £1,000.00. At Section 4.1 of the Policy under the heading of Tier 2 (final bullet point), there is a reference to Appendix 9.1, there is no Appendix 9.1 (suspect the reference should be to Appendix 8.1).	The Policy is reviewed to ensure that references in the Policy remain valid. The Policy is updated on the T2/T3 Teams site to reflect the latest version of the Policy, including the current De Minimis. Consideration is given to either redacting the De Minimis value recording in the Policy available on The Hub, or removing the Policy from The Hub.	To ensure consistency of approach when conducting reviews and transparency it is important that the policy is up to date and reflects the latest approved approach and thinking and that all references remain valid. De Minimis i.e. the upper value at which a deficit will be routinely considered for write off is operationally sensitive material and could have financial implications for the business if this figure is in general circulation.	High	26/03/2024	The central repository for all PM policies are on the branch hub, however PDF copies are placed on the teams site for ease of reference, 3.2 version is now available on the teams site. The policy will be updated as per the yearly policy review which starts every year in May and published in June. Jo Milton and Tracy Marshall are the owners of all PM policies The DM level changed between policy reviews from £500 to £1000. The amount referenced in the policy is not the DM limit. It is a two bullet line of principles applied by Triage to determine if a DM limit should be applied to the case. The DM limit is purposefully silent so as to be able to flex up or down depending on volumes / unit costs. Standard application in dispute resolution processes. However, Simon W annually reviews the policy with Jo Milton. Simon has already noted to make amends to make this clearer by removing a monetary value. The next annual policy review cycle begins in May, therefore this recommendation is already in progress as part of annual reviews/controls.	In Progress	30/06/2024
RMH0 2/24	Tier 2/3	The Lottery Team within Tier 2 are currently conducting a focused review as part of POL's exit from the National Lottery. As such, the team are not conducting a full Tier 2 review as set out in the Postmaster Support Policy - Accounting, Dispute Resolution and the current Investigation Strategy.	The decision to conduct a focused review should be recorded, this could be achieved by either: 1) A Lottery review specific policy making it clear what checks will and will not be performed by the T2 Lottery Team, or, 2) The Decision and Action Log for Lottery cases is updated to record the revised approach being adopted and the reason why only limited enquiries will be pursued.	The business is exiting its arrangement with the National Lottery and where a discrepancy relating to National Lottery is identified T2/T3 are tasked with performing a focused investigation. It is important that this change in strategy in such cases is recorded as without such a record, it appears that T2 are not compliant with their own policy and strategy.	High	26/03/2024	The team are conducting a full review of these cases, specific to lottery and complete T2 reports. In addition the team include wording in the report that this review relates solely to scratchcards. The project team were also involved in this process. As this is an exit programme we agreed to deal with cases in the spirit of our own process and did not require a specific lottery policy as it is a short term programme. The process we follow has been shared and agreed with the project team who have also provided guidance in how to deal with specific cases. The volumes have been lower than predicted and will shortly cease. We worked collaboratively with all other teams doing lottery investigations, who do not have separate policies or separate strategies, so rejected option 1 recommendation as not required. However, although the lottery dips have been inconsistent across teams, I will accept point 2 recommendation and we will start putting the wording that is already in the body of the lottery reports "this review relates solely to scratch cards" and note this in the decision and action log.	In Progress	05/04/2024
RMH0 3/24	Tier 2/3	Unable to access/locate the Postmaster Support Policy and Investigation Strategy as referenced in the T2/T3 investigation report.	A hyperlink is provided in the T2/T3 Investigation Report template to the Postmaster Support Policy and Investigation Strategy. Access controls to the Postmaster Support Policy and Investigation Strategy is set so that anyone with the link can access the same.	Currently and with a few exceptions, only those working in T2/T3 have access to the Investigation Strategy. As a result, anyone reviewing the investigation file either now or in the future outside of T2/T3 will not be able to access the Investigation Strategy.	Medium	26/03/2024	Partially accepted/partially rejected there is not a drop down for this. AM confirmed to use option reject. Accepted The policy is held on the branch hub central repository and a PDF version on the MS Teams Tier 2 site. The central repository for all PM policies are on the branch hub, however PDF copies are placed on the teams site for ease of reference, 3.2 version is now available on the teams site. Rejected Adding the hyperlink of the investigation strategy would confuse Postmasters. The investigation strategy underpins/ links to the official Postmaster Accounting Dispute policy V3.2. Adding the hyperlink has been discussed previously with A&CI (Oct 2023) and we agreed not to include the link in the report as it would confuse PM's, we agreed to add the strategy paragraph into the report, with the strategy document for internal use stored in the teams files for reference, which is where it can be viewed.	Rejected	

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RMH04/24	Tier 2/3	Scratch card Tool in use to reconcile scratch card transactions throughout the report involving scratch cards. No reference in the report that Scratch card Tool results are referenced back to source data	An explanation is provided in the investigation report setting out how the output from the Scratch card Tool is referenced back to source data and how only source data is used for decision making.	In the interest of transparency and just outcomes it is essential that only source data is used for decision making to avoid decision being made on false or misleading data outputs.	High	26/03/2024	Source data is used and attached to the dynamics case, so no issue. The Horizon data is placed in an excel spreadsheet which adds up the value of scratchcards, rather than manually adding up. Wording is in the report to reflect this. However in addition , we can add a further sentence "Results from the scratchcards excel spreadsheet are compared against source data and where both datasets reconcile no further verification is undertaken. In the event that the datasets do not reconcile then source data is interrogated to identify the reason for the discrepancy and the findings recorded in the report.	In Progress	05/04/2024
RMH06/24	Contracts Team	Communications with Postmaster via WhatsApp. WhatsApp messages not uploaded to the case file at the earliest possible opportunity. WhatsApp messages only visible to the Contracts Advisor in the case and the PM and not the wider case team. WhatsApp messages which are potentially disclosable, not being retrievable due to a problem with the Contract Advisor's phone.	Until such time as POL issues further guidance on the use of WhatsApp when communicating with Postmasters the following protocols should be adopted: 1) The use of WhatsApp should be discouraged and communications with PM routed via a POL email address. 2) Any decision to use WhatsApp when communicating with PM to be authorised on a case by case bases by Head of Contracts. 3) Communication between Contracts and the PM via WhatsApp must be restricted to a POL mobile phone. 4) Communications between Contracts and a PM via WhatsApp must be downloaded at the end of each working and saved to the case file.	While WhatsApp does provide a useful means of communication, when used in an investigative setting it does present security, data governance, disclosure and investigation management challenges. Security - While WhatsApp does provide end to end encryption, if the phone containing the messages is lost or stolen, and particularly if the phone is not password protected, sensitive POL data may be compromised. Data Governance - If the event that POL receives a DSAR or FOI request, the DPA team may need to search mobile phones to ensure respondent data is capture data. Disclosure - There is an obligation in both civil and criminal investigations to retain and record all relevant material, this includes communications on WhatsApp. Failure to comply with such obligations may expose Contract Advisors to a potential charge of perverting the course of justice. Investigation Management - It is imperative that all members of the wider case team have access to all relevant material in the case when making decisions relating to the matter under investigation. Sending and receiving electronic communications via a POL email address would resolve many of the issues highlighted	Medium	12/03/2024	Update (21/03/2024) - agree with the recommendation, although a wider business use policy needs to be considered. Happy to adopt the following: 1) I have discouraged the use of WhatsApp and that email comms be used as far as possible. 2) The team will agree with me on its use. 3) Communication are already restricted to a POL mobile phone and personal phones are not used 4) A copy of any WhatsApp communications are kept on the 'contact log' maintained by the team	Implemented	21/03/2024
RM07/24	Contracts team	While the conclusion is highlighted in the case resolution on dynamics and various documents can be identified in the case to explain what has happened, the description of the case, on Dynamics, has been left blank. Therefore, while looking at the Dynamics log for the case, it can be concluded that the PM has been reinstated and from what date, but there is no indication of why the PM was suspended in the first place unless all the attached documents are read.	All relevant fields completed in Dynamics.	Following a case from inception to conclusion in Dynamics is challenging. Failure to complete all relevant fields in Dynamics only exasperates these challenges and results in the reader having to review numerous documents to understand what has occurred in the case and why. This is time consuming and can be avoid if all relevant fields are fully completed.	Low	12/03/2024	New case management reporting tool process in Dynamics being designed for the contracts team, part of which will hopefully pick up on this requirement. Aim to have in place by end of Q4 with full training to the team on use and roll out in P1 (2024/2025). Once in place if any further work is needed to meet requirement then happy to talk through	In Progress	30/04/2024

Recently Closed Recommendations										
No.	Team	Owner	Observation	Summary of Recommendation in Previous Month(s)	Rationale	Priority	Date of Rec.	Summary of Assured Team Response/Progress towards Implementation	Status of Response	Anticipated Closure Date
RJ12	Branch Reconciliation	Alison C / Colette M	While the REM check form is uploaded to Dynamics, it appears to serve as an evidence gathering tool and not a report. Therefore, the reader is left to draw their own conclusions (which may differ from those reached by the IO). It also requires the reader to have a detailed knowledge and understanding of the data to enable them to interpretate the same.	A report template is produced in which the IO provides a plain language commentary on the lines of enquiry being followed, their findings from each enquiry and how this lead to the next enquiry. The report should conclude with the IO providing their conclusions on the matter under investigation and recommended next step.	An investigation report is the IO's opportunity to set out the facts of the case, identify key evidence, provide the reader with an assessment of the evidence and make recommendations on the next step. Failure to provide an investigation report means that the reader has to reconstruct the investigation themselves by trawling through all the material available and for them to reach their own conclusions. While there are occasions when this approach maybe justified it is generally not a good use of resources and should be avoided.	Medium	30/06/2023	Tab to be added to the Rem Check Template which details all the checks that form part of the rem check. Also summary tab to be added to explain next actions. Update AC 08/01/24 - the tab will be added when this work starts again once the source data is accessible by the end of Jan 24. Update OF 08/03/2024 - Tab added to Rem Check Template and proactive work restarted.	Implemented	27/10/2023
RJ14	Branch Reconciliation	Alison C / Colette M	No Investigation Strategy	Production of an Investigation Strategy. This is a requirement under Chapter 5 - Roles and Responsibilities of the Investigator Manual	An Investigation Strategy has been discussed with CM who has indicated that because of the nature of work conducted by the team, the team conduct the same investigation for all cases. It has, therefore, been agreed that a generic strategy can be produced and used for all cases and that in the event that the IO decides to deviate from the strategy due to the unique nature of a particular case then this will be recorded in the Decision and Action Log along with a clear rational for the deviation.	High	30/06/2023	Proactive Stock Investigations were temporarily paused whilst a decision was made regarding adjusting Stock Holdings. Now that it has been agreed BRT will continue this work but only review a reduced timeframe to allow Postmasters to access their own data, this action will be picked up again. Update - AC - 08/01/24 - There is a plan now to allow the stock team within BRT to access the source data for a 2 year review period. This should be resolved by the end of Jan 24. Update OF 08/03/2024 - All raw data available to whole team and proactive work restarted	Implemented	30/11/2023
RO12/23	Branch Reconciliation	Alison C / Colette M	It is not always clear from the case file why an investigation is being opened. Further searches under different CAS numbers relating to the same branch sometimes, but not always, provide a clue as to the reason why an investigation has been opened.	A clear reason for opening the investigation using the pneumonic JAPAN is set out in the Description box on the Activity Pane in Dynamics.	It should be clear to all from the case file why an investigation has been opened. When opening an investigation the Investigator should be mindful of the pneumonic JAPAN and ensure that the investigation is: Justified Authorised Proportionate Auditable Necessary Failure to set out the reason for opening an investigation can lead to challenges under Article 6 HRA.	Medium	12/10/2023	To be explored further on how we can introduce appropriate wording to be used 24/01 CM - Once the source data training has taken place by end of Jan 24, Proactive work will be relaunched in Stock Team this will include training around detailed description being added to the Dynamics case. OF to send AM a copy of the template to be used to ensure it captures all requirements Update OF 08/03/2024 - Template was sent to AM and confirmed and feedback explains it matches requirements and proactive work restarted	Implemented	31/12/2023
RO13/23	Branch Reconciliation	Alison C / Colette M	In 6 out of the 7 cases sampled had no REM Check Template uploaded to the case file.	A REM Check Template is utilised in a 100% of investigations and uploaded to the case file.	A REM Check Template is the standard investigation template used by BRT and is a stipulated requirement as per E3.1 of the Investigator's Manual. The template provides a strategic direction and uniformity to the investigation work conducted by BRT.	High	12/10/2023	This should be happening - additional training will be given to ensure this take place 24/01 CM - Proactive work has been on hold until we could ensure Source Data could be accessed. This action will happen moving forward. Update OF 08/03/2024 - Rem check template created an confirmed by AM. Training has been given to proactive team to ensure understanding	Implemented	30/11/2023

Recently Closed Recommendations										
No.	Team	Owner	Observation	Summary of Recommendation in Previous Month(s)	Rationale	Priority	Date of Rec.	Summary of Assured Team Response/Progress towards Implementation	Status of Response	Anticipated Closure Date
RO15/23	Branch Reconciliation	Alison C / Colette M	Raw reports upload to Dynamics as evidence. However, it is often not clear (to non-team members) what purpose the report serves and without a degree of analysis by an appropriately trained person whether the report supports or undermines the investigation.	Having completed a line of enquiry/conducted analysis the findings should be entered in the REM Checklist, recording how this finding impacts on the investigation and whether it supports or undermines the investigation.	It is important that if someone independent of BRT (an Inquiry for example) were to review the case file that they could understand the outcome of each line of enquiry and how this impacts on the overall case.	Medium	12/10/2023	Consideration will be given on how we quality assure in this team 24/01 CM - This will be added to the summary tab of the Rem check. Update 08/03/2024 - Stock rationale document has been updated to include all recommendations from AM. Proactive work has restarted	Implemented	30/11/2023
RO16/23	Branch Reconciliation	Alison C / Colette M	It is noted on several cases in the dip sample that the investigator telephones the PM. A brief note is entered into Dynamics which lacks detail and the only way to understand what was said during the conversation is to listen to the recording in Puzzel. The recording is not always easy to locate and is time consuming to listen too. Having listened to the recording it is noted that in one case the IO undertook to conduct follow up action. This action either did not take place or if it did, the action and the outcome was not recorded in Dynamics.	All points covered in a telephone conversation are summarised and captured in Dynamics. Where the IO undertakes to follow up on an action during a call, that follow action take places and the outcome of the same it captured in Dynamics.	While a recording of a telephone conversation is excellent evidence, the listening of calls is not the most effective way of assessing the value of the evidence available. Therefore, in addition to the recording the call an IO should provide a brief summary setting out all the matters that were discussed during the call including those that point away from the investigation. Post call the IO should evaluate what was said during the call and seek to follow up and/or corroborate what was said during the telephone conversation.	Medium	12/10/2023	Additional training will be given in this area 24/01 CM - When the Source data training has taken place by end of Jan 24, this action will be added to the relaunch and training delivered to Proactive Team. Update OF 08/03/2024 - Phone call template has been created by myself to ensure all details of a phone call are captured and added to the dynamics case	Implemented	30/11/2023

Recently Closed Recommendations											
No.	Team	Owner	Observation	Summary of Recommendation in Previous Month(s)	Rationale	Priority	Date of Rec.	Summary of Assured Team Response/Progress towards Implementation	Status of Response	Anticipated Closure Date	
RJA02 /24	Tier 2/3	Tracy B / Simon W	Investigations complete and root cause of issue identified and problem resolved. However, there is no report on file explaining what lines of enquiry have been followed and how these lead to the resolution of the problem. As there is no report on file, it follows that there is no Decision and Action log on file as this is currently embedded in the closure report.	Where an investigation leads to the identification of the problem and the discrepancy/issue is resolved then a short report is produced explaining the lines of enquiry followed and how these led to the resolution of the issue. The Decision and Action log must be completed in all cases.	In the interests of transparency and to protect Support Advisors from allegations of malpractice, it is important that a record is kept to explain why an investigation which has not lead to the recovery of funds/a sanction applied is kept and maintained.	Medium	12/01/2024	Accepted - Out of 2 of the 4 cases dipped this month. CAS-3110304 the branch gain was offset the following TP, by a branch debit discrepancy and a TC. CAS-3089878 - A debit discrepancy was offset the following TP by a gain and a TC to offset. Noted there should be a report lite attached to the dynamics case for full transparency and a reminder will be issued to the team. Noted A&CI will check in this round of testing before the end of March, note use current cases not retrospective at T2/T3 stage of a discrepancy review. NSR changed the anticipated closure date to 31/02/2024 to reflect A&CI comments in column N A&CI 12/03/24 - Testing complete and report lite attached to cases completed after 22/1/24, therefore, action closes as implemented.	Implemented	31/03/2024	
RJA06 /24	Contracts team	David Southall	Alleged confessions by PM's of misappropriation of POL funds captured verbally only and not recorded in sufficient way as the confession could be offered in evidence in whatever venue.	If during a meeting with a PM they admitted to misappropriation of POL funds, a note should be made of what was said and the PM invited to sign the note. All telephone calls to PMs should be recorded via Puzzei thus capturing any admission made. If a call is received from a PM and therefore, not automatically recorded via a Puzzei, a note of the telephone conversation should be made immediately following the call using the template provided in the Investigator's Manual and saved to the case file. Consideration should be given to sending an email to the PM following such calls, thanking them for the call and in the email stating, 'during this call you said that POL funds have been used for' etc. During any subsequent meetings with the PM, which must be recorded, the admission must be probed in granular detail, how much money, when was this, what did they do with the money, where was the money transferred to, how was this transfer enacted, why did they do this, what was their intention.	If admissions of wrong doing are not captured in an evidential format, at the time the admission is made, then such admissions may be lost or later withdrawn/denied. Loss of key evidence, such as an admission, can lead to cases being lost (in whatever venue) and/or reputational damage and it not being possible to recover POL funds. All admission must be probed in granular detail and corroborated. An admission must never be the only piece of evidence.	Medium	12/01/2024	I agree that there is a need for the Contract Advisor to consistently capture conversations with postmasters and where as admission is made ensure this is recorded correctly (using Puzzei if able to). I would be nervous for it to be the role of the Contract Advisor (who make a determination as to whether a postmaster has breached their agreement) to act as security investigators and interrogate a postmaster during a meeting environment nor ask that they sign statements. This feels to me like a PACE type environment. We also need to be mindful that a Branch Assurance visit, where a postmaster may be suspended, is in itself a stressful experience which may have an impact on what the postmaster says. Proposal a) Puzzei is being introduced into the team with guidelines as to when use (and if unable to use how to capture their calls consistently and contemporaneously). Consideration also to be given to sharing a record of the conversation with the postmaster after it has taken place b) Any admissions (or suspicion) of alleged criminal activity to be referred through Triage to Assurance & Complex Investigations who, through their investigation team, may want to follow up directly with the postmaster A&CI 08/02/24 - There is no suggestion that the Contract's team conduct a PACE interview. Update 13/03 - Puzzei now used by all the team. Still need to work through how the content can be shared with the postmaster. Update 19/03/24 , Discussion with A&CI regarding sharing record with Postmaster post meeting which will be shared with the team. Action now implemented.	Implemented	31/03/2024	

Recently Closed Recommendations										
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RJA07/24	Contracts team	David Southall	Relevant material not uploaded to the case file at the point of collection. Multiple items of relevant material uploaded to the case file in a matter of a few minutes, which suggests that material is being stored on the IO's local drive and not on the case file. Evidence only uploaded to the case file after the PM has been terminated. Only evidence that the case team intends to rely upon uploaded to the case file with no other material uploaded to the file. Failure to comply with the requirements in Appendix F of the Investigator's Manual	All material gathered during the course of an investigation, or generated by the IO themselves must be uploaded to the case file at the point of collection, or if not practical to do so, as near as practicable thereafter. A sub-folder structure designed within case files in order that material can be separated between evidence on which the case team are seeking to rely and other material.	Failure to comply with the disclosure obligations as set out in Appendix F of the Investigator's Manual may result in the following: Cases either unable to proceed or Decision Makers (in whatever venue) being unable to make a determination. Miscarriages of Justice. Reputational Damage. Allegations that the IO perverted the course of justice. Decisions (in whatever venue) being overturned. Compensation being paid to those impacted.	High	19/01/2024	Call held with the team on the 29 January 2024 to talk through document storage. Proposal is to introduce a new document management system to replace the case summary document (which is currently a word document) whereby all documents that the Contract Advisor has been provided will be uploaded to a SharePoint site relevant to that branch. The decision rationales completed by the Contract Advisor will then include a hyperlink to the relevant folder on the site (as well as individual hyperlinks to the documents referred to in the rationale so everything is stores in one place) Will test this with a live case and then review how it has gone at our next team meeting (29 February 2024) with a view that it will be rolled out by the end of March (start to use from P1 2024/2025) Update (13/03) - still on track for introduction for end of March. Live cases currently being tested (and working well) and all cases will be managed this was from April onwards. Update 19/03/24 Implemented with effect 20/03/24	Implemented	31/03/2024
RJA08/24	Contracts team	David Southall	Multiple items of relevant material uploaded to the case file in a matter of a few minutes, which suggests that material is being stored on the IO's local drive and not on the case file. Evidence only uploaded to the case file after the PM has been terminated.	All material stored in one central case file (not local drives) which is visible can be accessed by all teams who are party to the investigation.	Evidence uploaded to a file retrospectively undermines the provenance of the evidence and degrades the continuity. This in turn can lead to the admissibility of evidence being challenged and may result in key evidence being lost (regardless of venue). If the whole of the investigation file is not visible to all teams then this may result in work being repeated, decisions being made without a full and complete understanding of all the facts. Actions being missed (slipping through the gaps) as a result of a team believing another has completed or will complete an action.	High	19/01/2024	Call held with the team on the 29 January 2024 to talk through document storage. Proposal is to introduce a new document management system to replace the case summary document (which is a word document) whereby all documents that the Contract Advisor has been provided will be uploaded to a SharePoint site relevant to that branch. The decision rationales completed by the Contract Advisor will then include a hyperlink to the relevant folder on the site (as well as individual hyperlinks to the documents referred to in the rationale so everything is stores in one place) Will test this with a live case and then review how it has gone at our next team meeting (29 February 2024) with a view that it will be rolled out by the end of March (start to use from P1 2024/2025) In addition to this the team (again on the 29/01/24) have been reminded about the importance of uploading to Dynamics at the time and not at the end. Update (13/03) - still on track for introduction for end of March. Live cases currently being tested (and working well) and all cases will be managed this was from April onwards. Update 19/03/24 Implemented 20/03/24	Implemented	31/03/2024

Recently Closed Recommendations											
No.	Team	Owner	Observation	Summary of Recommendation in Previous Month(s)	Rationale	Priority	Date of Rec.	Summary of Assured Team Response/Progress towards Implementation	Status of Response	Anticipated Closure Date	
RJA09 /24	Contracts team	David Southall	Management review is generic and simply states that the manager has read the report and agrees the findings. This approach provides no assurance that the manager has actually read the report or provided any evidence of overview and scrutiny. Note - this is a repeat of recommendation RJ08 which was closed as implemented 26/05/2023	The manager should confirm that they have read the report and provided specific rationale as to why they believe the findings of the investigator are correct and well founded. See section 11 of the Investigator's Manual for further guidance on what should be included in Manager's review.	Failure to provide specific feedback and confirmation as to why the manager believes the recommendations of the IO are correct undermines the credibility of the management review and therefore, the investigation process as a whole. Which in turn may lead to Decision Makers questioning the thoroughness of the investigation and undermine the Decision Maker's confidence to make robust determinations resulting in poor outcomes.	Medium	19/01/2024	Noted, will need to consider how this feeds into the outputs from the Termination Decision Committee Update (13/03) - narrative now increased to support the decision setting out why the decision meets the requirements as set out in the relevant policy document (particularly the suspension and termination policies). This will be evidenced in any rationales from March onwards. Once the Postmaster Contract Termination Committee are live (April 2024 onwards) this narrative will be captured in the committee meeting notes and the commentary added to the decision rationales)	Implemented	31/05/2024	
RJA10 /24	Contracts team	David Southall	Postmaster contract terminated due to breach of contract. No supporting Tier 2/3 report. As a result, there was no KEL check performed nor confirmation that Horizon was not a contributing factor in this case.	In cases involving branch discrepancies no Postmaster contract terminated without a supporting Tier 2/3 (or A&CI Transactional Analyst) report.	The Common Issues Judgement places an obligation on POL to demonstrate that Horizon was not a contributing factor when considering taking action against a PM relating to a branch discrepancy. The way POL demonstrates compliance with this obligation is the completion of a Transactional Analyst report. Without such a report, POL is unable to demonstrate that Horizon was not a contributing factor in the branch discrepancy and any termination and/or recovery are potentially unsafe and are liable to challenge.	High	19/01/2024	It needs to be noted that the postmaster's agreement was not terminated due to discrepancies, instead it was the (admitted) action that they had used over £200k of Post Office money to fund improvements on the retail side. Given the admission a Tier 2/Tier 2 report was not requested, however this is noted and a Tier 2/Tier 3 report will be requested for any termination decision that involves a branch discrepancy (whether POL knows the cause or not). This has been implemented with immediate effect. Please note though that all decisions to terminate can be challenged by the postmaster, in this case the decision was challenged and the decision to terminate was upheld by the Decision Review Panel. A&CI 08/02/24 - The recommendation relates to 2/3rds of the cases in the dip sample and not just one case. Assured Team invited to revisit this recommendation and recommendation reopened by A&CI. Update (13/03) - not sure what additional action needed here, as noted a Tier 2/Tier 3 report will be requested for any termination decision that involves a branch discrepancy (whether POL knows the cause or not)	Implemented	29/02/2024	

Recently Closed Recommendations										
No.	Team	Owner	Observation	Summary of Recommendation in Previous Month(s)	Rationale	Priority	Date of Rec.	Summary of Assured Team Response/Progress towards Implementation	Status of Response	Anticipated Closure Date
RJA13 /24	Contracts team	David Southall	No direct correlation between findings recording in rationale documents and supporting evidence.	Each piece of evidence given a unique reference number/link When producing Rationale Documents the IO provides the reference number/hyperlink to the piece of evidence they are seeking to rely upon in support of the point they are making. Any evidence that undermines the case and/or assists the other side specifically referenced in the Rationale Document and brought to the attention of the decision maker and the other side.	Without a unique reference number/link, it is challenging for the decision maker to appreciate the full weight of evidence available to prove a particular point. Failure to highlight and bring to the attention of the Decision Maker and the other side material that undermines the case or assist the other side, exposes the IO and POL to legal challenge, reputational damage and may lead to a miscarriage of justice.	High	19/01/2024	As above - Proposal is to introduce a new document management system to replace the case summary document (which is currently a word document) whereby all documents that the Contract Advisor has been provided will be uploaded to a SharePoint site relevant to that branch. The decision rationales completed by the Contract Advisor will then include a hyperlink to the relevant folder on the site (as well as individual hyperlinks to the documents referred to in the rationale so everything is stores in one place) Will test this with a live case and then review how it has gone at our next team meeting (29 February 2024) with a view that it will be rolled out by the end of March (start to use from P1 2024/2025) Update (13/03) - still on track for introduction for end of March. Live cases currently being tested (and working well) and all cases will be managed this was from April onwards. Update 19/3/24 Implemented 20/03/24	Implemented	31/03/2024
RJA15 /24	Contracts team	David Southall	Case spanning several months and occasionally years, with no recorded management review/oversight.	Management conduct at least a monthly review of all open investigations and record that a review has taken place on the case Action and Decision log in accordance with the Assurance Section of the Investigator's Manual https://poluk.sharepoint.com/sites/InvestigatorsManual/SitePages/Assurance.aspx	Failure to provide support, guidance and oversight to IO's can lead to the IO becoming blinkered, lines of enquiries that ought to be pursued not being followed, which in turn can lead to poor investigative outcomes.	Medium	19/01/2024	Support already given to the team on an ongoing basis, with weekly calls to talk through any branches they are dealing with. A&CI 08/02/24 - Evidence in support of response requested. Update (13/03) - need to understand what evidence I can provide here, these updates form part of a weekly catch up I have with each team member. Need to balance capturing evidence against my time needed by me to write everything up. Support on the evidence needed here would be appreciated. Update 19/3/24 Advice provided by A&CI and to be implemented with effect 20/3/24.	Implemented	29/02/2024

Recently Closed Recommendations											
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RMHO 6/24	Contracts Team	David Southall	Communications with Postmaster via WhatsApp. WhatsApp messages not uploaded to the case file at the earliest possible opportunity. WhatsApp messages only visible to the Contracts Advisor in the case and the PM and not the wider case team. WhatsApp messages which are potentially disclosable, not being retrievable due to a problem with the Contract Advisor's phone.	Until such time as POL issues further guidance on the use of WhatsApp when communicating with Postmasters the following protocols should be adopted: 1) The use of WhatsApp should be discouraged and communications with PM routed via a POL email address. 2) Any decision to use WhatsApp when communicating with PM to be authorised on a case by case bases by Head of Contracts. 3) Communication between Contracts and the PM via WhatsApp must be restricted to a POL mobile phone. 4) Communications between Contracts and a PM via WhatsApp must be downloaded at the end of each working and saved to the case file.	While WhatsApp does provide a useful means of communication, when used in an investigative setting it does present security, data governance, disclosure and investigation management challenges. Security - While WhatsApp does provide end to end encryption, if the phone containing the messages is lost or stolen, and particularly if the phone is not password protected, sensitive POL data may be compromised. Data Governance - if the event that POL receives a DSAR or FOI request, the DPA team may need to search mobile phones to ensure respondent data is capture data. Disclosure - There is an obligation in both civil and criminal investigations to retain and record all relevant material, this includes communications on WhatsApp. Failure to comply with such obligations may expose Contract Advisors to a potential charge of perverting the course of justice. Investigation Management - It is imperative that all members of the wider case team have access to all relevant material in the case when making decisions relating to the matter under investigation. Sending and receiving electronic communications via a POL email address would resolve many of the issues highlighted above and therefore, the use of WhatsApp should be discouraged.	Medium	12/03/2024	Update (21/03/2024) - agree with the recommendation, although a wider business use policy needs to be considered. Happy to adopt the following: 1) I have discouraged the use of WhatsApp and that email comms be used as far as possible. 2) The team will agree with me on its use. 3) Communication are already restricted to a POL mobile phone and personal phones are not used 4) A copy of any WhatsApp communications are kept on the 'contact log' maintained by the team	Implemented	21/03/2024	



Assurance & Complex Investigations

Head of Investigation Branch

John Bartlett

John.Bartlett

GRO

Senior Investigations Manager

Andy Morley

Andrew.R.Morley

GRO