

## Investigation Interview Guide

Specialist name: \_\_\_\_\_ Branch: \_\_\_\_\_  
Date: \_\_\_\_\_ Start time \_\_\_\_\_ End time \_\_\_\_\_

Please provide details of all parties present:  
Include name, title and in what capacity they are present.

### **Before you start the interview you must;**

1. Introduce everyone.
2. Confirm who is responsible for recording the questions, answers and any notes.
3. Remind the Specialist of the reason for the meeting and reiterate the allegation(s) against them as detailed in the invite letter;
4. Make them aware of the possible outcomes arising out of the investigation stage namely that there could be no further action taken or where the investigation indicates the possibility of formal action being taken, the matter could lead to a disciplinary hearing if it is found that there is a case to answer and any disciplinary hearing will be heard by a different manager.
5. Remind the Specialist that this stage is purely an investigation and is not a disciplinary hearing.
6. Make sure the Specialist is aware of their rights; which are:
  - They will be given the opportunity to answer the allegation made and state their case.
  - Have the support of a colleague or union representative if they require. However, the colleague or union representative is there purely in a supportive role; they are not part of the interview and therefore they are not able to answer on behalf of the Specialist and they are not there to comment or ask questions, unless asked to do so.If the union representative is not a CWU representative, ask for union identification.
7. Either party (including the colleague or union representative) can ask for an adjournment during the meeting.

### **To be read out in full**

As detailed in the investigation invite letter there is a concern that you have failed to adhere to the compliant sales process that you have been trained and accredited in with regard to the sale of Growth Bonds. You have needed to demonstrate your understanding of the compliant sales process whenever you have been observed as part of the Training & Development scheme. However, there is reason to believe you have not always adhered to this sales process and this has resulted in a number of sales made being investigated and the business has also conducted a number of Customer Care calls to ascertain if customers were free to make their own fully informed decision or if their decision was made based on advice made by you.

As a result of our initial investigations it appears that you have failed to follow the correct process on xx occasions [detail specific dates/details]; there are a further xx cases that are still being investigated. The customers spoken to have invested into more than one Growth Bond of the same fixed term on the same day. It would appear that they have stated that they split the funds based on your advice or recommendation.

[For those employees who are suspected of not following *Post Office Anti-Money Laundering Procedures* – it also appears that you may have failed to follow the correct process in relation to Post Office's Anti-Money Laundering procedure. Specifically, it

would appear that you accepted more than £1000 in cash from a customer in opening their account [detail any other specifics relating to the AML breaches]

Post Office Limited is fully committed to preventing criminals from using its branches to launder money. As a business, we are legally obliged to comply with the Money Laundering Regulations. By following our procedures you will help Post Office Limited meet that obligation and also help to disrupt and discourage criminal activity in your branch and across our network.

By accepting more than £1,000 in cash from an unknown source <sup>L1</sup> you have failed to comply with the Post Office® anti- money laundering procedures.

The aim of today's meeting is to understand your views on these allegations. If you admit that there were occasions when you recall not following the compliant sales process, your reasons for taking this action will be investigated and your answers recorded.

**To be read out only if the Specialist has been de-accredited in savings.**

As a result of our initial concerns we have had to withdraw your accreditation in savings as a precautionary measure; the withdrawal will remain in place until we can establish all of the facts and a final decision can be made as to whether there is a case to answer on this issue.

**Invite the Union Representative or colleague to make any representations**

Can I please invite \_\_\_\_\_ to make any representations at this point?

**Read out**

You are aware of the allegations and you have been provided with further information about them. This is your now your opportunity to comment; please try to give as much detail as possible as this will assist us in the investigation. Can I please remind you that your comments will be recorded in writing and you will be provided with a copy of the notes following this investigatory meeting.

**Ask the following questions**

1. When you first meet a customer you have to explain to them how you can help them and the service they will receive. This should be part of your introduction; in regarding to giving advice what do you make the customer aware of?

## Page 2 Comments

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L1 Need to address this to cover situation where we did know the source  
*bloomfield, 25/08/2011 09:47 PM*

2. Here is a copy of the Post Office's Terms of Business; all customers must be provided with a copy of the Post Office's Terms of Business to reinforce the key message regarding not giving advice. Can you confirm you are familiar with this document and the need to provide customers with a copy?

3. Do you understand why you cannot give advice to customers?

4. What is your recollection of the reasons for the customer splitting their investment over more than one growth bond?

1 | 5. Did you discuss the available terms for the Growth Bonds with the customer? Why are the customer's bonds all for the same term?

6. How was this decision arrived at? Was it prompted or suggested by you as being the appropriate thing for the customer to do, or did the customer ask for your opinion? If so, how did you do this/what did you say?

7. Can you explain why you think the customers spoken to have stated that the reason they split their investment into the Growth Bond was because of your advice?

8. Based on what I have told you so far, do you consider that what you were doing was non-compliant? [If yes....why have you done this? What was your reason for doing so?]

9. What is your view of the customer's recollection of your meeting with them?

10. A formal communication (dated 19 November 2010) was issued by Richard Barker when he was the General Manager; here's a copy of the communication for your reference. Have you seen this before? Once you have read the communication can you please confirm your understanding of the instructions?

2 | 11. The training & development scheme requires all Specialists who are accredited in savings to be observed on a regular basis. Have you ever been assessed as non-competent as a result of not following the correct sales process?

12. Is there any reason why you made the decision to advise the customer even though this is non-compliant behaviour; including any circumstances that you view as relevant as to why you advised the customer?

13. What are your sales targets? How do you approach these? [If non-compliance is admitted, was your behaviour motivated by the targets? Do you receive a bonus based on this?] [Issues relating to the motivation for the FS's behaviour need to be explored based on their responses].

14. Is there anything you would like to add at this point?

15. [For those employees where there are concerns about failure to follow Post Office Anti-Money Laundering procedures:

- a. How did the customer pay to purchase these bonds?
- b. Are you aware of the Post Office Anti-Money Laundering procedures you are required to follow? [Provide a copy to them]
- c. Did you follow it in respect of this customer?
- d. Can you explain why you did not follow it in this instance?
- e. Do you agree that failing to follow the AML procedures is a serious issue?

**Read out in full**

Our investigations have not been fully completed to date so it is likely we may need to meet again should anything else that I may need to discuss arise.

You will be forwarded copies of the notes from today's meeting and I request that these are returned to me counter-signed within 3 working days to enable me to finalise my decision as to the next stages as soon as possible. You will be provided with copies of any further evidence that we find.

Where you have admitted to using the incorrect procedures or where the evidence suggests that you have broken the rules regarding behaviours and process; this may lead to a disciplinary hearing for "serious misconduct" which could lead to dismissal.

You are currently suspended on full pay. Your suspension will continue whilst we are investigating this matter, but it will be kept under review. Please note that suspension is not disciplinary action. Whilst you are suspended [*include details of what is expected whilst an employee is suspended, i.e not to contact colleagues etc*]<sup>[12]</sup>

**If the individual has NOT admitted to using the wrong process and despite the evidence produced at this meeting still denies it ask the following questions:**

1. As I clearly stated earlier xx of your customers have stated that they decided to split their investment into multiple Growth Bonds with the same fixed term on the same day and this decision was based on your advice. Would you like to comment on this?
2. [Where relevant to the circumstances, reiterate the questions around the Post Office's AML procedures.]

## Page 4 Comments

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**L2**      HR to provide this  
*bloomfield, 29/08/2011 05:41 PM*

3. At this stage do you want some time to reflect on the answers you have provided so far? [offer them 15 mins to confer. They may request a longer time to consider a response; allow them to do so]

**Confirm if the Specialist has taken time to confer YES/NO**

- Do you want me to ask you any of the questions again?
- Would you like to change any of the answers you have given previously?
- Do you have any further comments to make?

**Read out in full**

At the moment we have conflicting information so I now need to consider both your responses and those of the customers.

Our investigations have not been fully completed to date so we may need to meet again should anything else that I may need to discuss arise.

You will be forwarded copies of the notes from today's meeting and I request that these are returned to me counter-signed within 3 working days to enable me to finalise my decision as to the next stages as soon as possible. You will be provided with copies of any further evidence that we find.

This further evidence will be taken into consideration and assist with the decision making process as to whether there is a case to answer and whether this matter should proceed to a disciplinary hearing.

You are currently suspended on full pay. Your suspension will continue whilst we are investigating this matter, but it will be kept under review. Please note that suspension is not disciplinary action. Whilst you are suspended [*include details of what is expected whilst an employee is suspended, i.e not to contact colleagues etc*]

## Track Changes

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1            Insert            *bloomfield, 29/08/2011 05:42 PM*  
2            Insert            *bloomfield, 29/08/2011 05:42 PM*