

| Department / Team | KPMG identified observation | Relevant KPMG Recommendations | Up-date from business | H of CIU comments | Actions | Timescales / Factors | Progress |
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| Postmaster complaints | The Issue Resolution team have no formal triage process and no set criteria to identify high risk or priority cases | <ul style="list-style-type: none"> A formal triage process should be put in place. Formal documentation of criteria for triaging would allow consistent interpretation of what should be categorised as low or high risk. The categories should allow for flexibility and be updated as cases are reviewed and individual decisions differ | IRT team will review complaints to identify any WB issues. Matters logged as WB reviewed by IRT manager monthly. Training being produced with WB team. Aiming to have a triage system by end of March 2022. Complaints are sent to the relevant business team where specialist knowledge is required. | <p>It is only a WB report if the reporter meets the PIDA criteria. These should continue to be referred through to WB team.</p> <p>Matters which need investigation but are not linked to a WB also need to be centrally reported but in line with agreed thresholds / criteria.</p> <p>IRT seems a priority area.</p> | <ol style="list-style-type: none"> 1) Examine functionality of Conversant for handling both WB material and other Notifications and Referrals 2) Map pipelines 3) Establish a central WB, Triage, & Assessments team consisting initially of the current WB team manager as the team leader, two investigators to conduct triage function and investigate cases or refer most complex to CIU, one analyst to both produce MI and thematic assessments, and one 12 month FT contractor to work with the rest of the team in developing processes and training material then assist with embedding triage and assessment functions; 4) determine "notification" and "referral" criteria/ thresholds and any relevant templates for processes to capture all relevant data from IRT to facilitate WB investigations, CIU to select appropriate cases, offer support to IRT or other teams, and permit analyst to produce MI and assessment work | <ol style="list-style-type: none"> 1) Speak with Conversant by mid March 2022 2) End of March 2022; 3) Recruit contractor and analyst to time appointments with budget availability; 4) Develop definitions, thresholds, categories, processes, templates, and training material for IRT two months after appointment of contractor and analyst; roll out training over following two weeks; | |
| | Area Managers / other POL departments can be investigators for Postmaster complaints. Although this provides a good understanding of the branch/relevant business area, it does mean that there could be a lack of (or perceived lack of) independence between the investigator and the subject of the investigation. There is no formal requirement for an investigating manager to confirm that they believe themselves to be sufficiently independent to undertake the investigation | <ul style="list-style-type: none"> Market practice would be to have either fully independent investigators or a robust formal process to confirm independence by the investigating manager and certain types of case performed by independent investigators of the appropriate grade. | <p>The Area Managers and Branch Support Centre advisors are empowered to take ownership and resolve the complaints at first point of contact. If the postmaster does not accept the response, the complaint must be escalated to the IRT who will (independently) review the complaint. This is detailed in the process and guidance provided to Area Managers.</p> <p>Business areas who receive a complaint are advised to ask the postmaster to log it via Branch Hub, BSC and Area Managers. (GLO/Complaints training to all colleagues due Feb 2022)</p> <p>Complaint Handling Training was delivered to Area Managers in May 2021. The IRT Manager will attend Area Manager Business Update in February to reconfirm the process Area Managers should follow when they receive a complaint.</p> | <p>IRT Notifications could include a comment about independence of business-based investigators which the Triage function can challenge if appropriate.</p> <p>Where a matter is referred to WB team or on to CIU then independence is assured</p> | <ol style="list-style-type: none"> 5) Build independence assessment into the Notification process | As part of 4 above | |
| | The team do not have a formal training plan. They are provided with ad-hoc training by team leads and the Commercial Contact Centre Manager. | A training plan should be developed including specific investigations training for all individuals responsible for conducting investigations | <p>IRT will have complaint handling training in May 2022, will complete all mandatory training on Success Factors, have developed training guides including escalation process.</p> <p>Branch Support Centre have had training from IRT Manager re complaints re Royal Mail and Parcel Force</p> | <p>Investigations training should be developed and provided by WB investigators and CIU investigators</p> | <ol style="list-style-type: none"> 6) WB-specific training for business-based investigators to be developed and delivered by WB team in addition to on-line material. Is the material used in the briefings WB do now sufficient or a good start point for this objective? 7) Structure, approaches, record keeping, decision making, and evidence collection training to be developed and delivered for business-based investigators by CIU investigators | <ol style="list-style-type: none"> 6) review current material by end of March 2022 7) Within two months of appointment of CIU investigators develop material for business-based investigators for delivery over the following month | |
| | Dynamics is used to log cases, record outcomes and upload and store documents where the investigation is performed by the Issue Resolution Team. When an investigation is undertaken by an Area Manager they record their findings in Qualtrics, and the text has to be manually uploaded by the Issue Resolution team into Dynamics as a 'note' or 'activity' to ensure that the full detail of the case is recorded in Dynamics | Consideration should be given as to whether Area Managers can record findings directly into Dynamics, to ensure investigations are consistently documented | <p>This was considered in the past when setting up postmaster complaint process. The business decision at the time deemed it wasn't viable (cost of licences, consistency of use across the business, what would the Area Managers use it for). The decision was taken for Area Managers to capture the complaint via the branch forms and call logs, IRT would then log them on dynamics to make sure complaints were captured consistently for MI. It also meant the AMs only had to complete one system when logging contact with a PM.</p> | <p>Short term: Use Conversant to log matters which are Notifications and where business-based investigators investigate so they can up-date as they go along. Support in Triage required (need to check licences etc). WB referrals already logged in Conversant. This will capture data for MI and assessments.</p> <p>Longer term: consider acquiring Altia or other case management system with other investigative functionality.</p> | <ol style="list-style-type: none"> 8) Understand the flow of information and record keeping as it stands <p>Feed into 4 above</p> | <ol style="list-style-type: none"> 8) By end of March 2022 <p>As 4 above</p> | |
| Contracts | The Contracts team have no formal triage process and no set criteria to identify high risk cases | A formal triage process should be instigated with set criteria for what constitutes a high risk case. | 21/1/22 - No review has been undertaken as it needs to be determined what is a 'high risk' case and whether this is benchmarked against other investigation teams as to how they would triage cases . | As above, thresholds, definitions, processes, and training need to be developed but with the same premise of Notifications and Referrals being made into Triage | <p>As 1 to 4 inclusive above</p> <p>Need to assess priority of this team in terms of assessment, on-boarding, and training</p> | As 1, 3 and 4 above Priority will determine timings of 2 | |

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| | Suspension and termination decisions could result in legal action by the Postmaster. POL should consider whether Legal input earlier in the process would be more appropriate especially for cases that have a higher potential risk of future litigation, to facilitate privilege and consider whether reporting to LEA's is required under CLEP | POL should consider whether all suspension and termination cases should be conducted in partnership with POL Legal to facilitate privilege. | 21/1/22 - Legal services currently have sight of termination decisions and provide a risk note on the recommendation made. Input will be needed here from Legal as to how this would work. | Would civil litigation between POL and a dismissed/suspended postmaster not be stayed anyway pending a prosecution by police on the same or similar facts? At what point in an investigation does it become a "suspension" or "termination" case? This should be after the completion of at least some investigative work in the case of suspension. All CIU investigations should have the appropriate "type" of lawyer allocated to it which will help manage the higher risk investigations. Non-CIU investigations should have guidance for when and how to access legal advice. Consideration should be given to limiting Security and CIU to conducting criminal investigations and application of CLEP. | 9) Legal to develop engagement guidance for non-CIU investigators 10) Decision required re conduct of criminal investigations | 9) Dependent on Legal resource 10) Unknown but need prior to further work on structure, process, and function | |
| | • The Contracts team do not formally report on cases or outcomes but discuss cases with the Franchise Partnering Director on an informal basis. | • The Head of Contract Management and Deployment is working on building case data into a monthly Franchise Partnering Scorecard for more comprehensive upward reporting. | 21/1/22 - MI provision currently being developed with the view that reporting provisions will be in place for Q1 2022/2023 | With cases notified or referred to Triage then MI can be extracted and placed into an assessment. | 11) ID what Assessments or MI is required and at what regularity | 11) Discuss with business when analyst is in place and data being submitted | |
| | Contract Advisors identify and record business improvement opportunities which are informally communicated | • The process over lessons learnt should be formalised to ensure that the valuable insights gained by the team are treated appropriately. | 21/1/22 - To be reviewed. | When the business-based investigators update Conversant, outcomes/lessons learnt – can be included in assessments | 12) ID what Assessments or MI is required and at what regularity | 12) Discuss with business when analyst is in place and data being submitted | |
| | There is no follow up mechanism to see if these improvements are actioned | A feedback mechanism should be introduced so that the Customer Complaints team can check issues have been addressed by Area Managers | n/a | Follow-up for senior business leader, or Audit, or Gov functions: Assessments to provide them with sanitised monthly or quarterly report based on data on Conversant? | to be discussed | | |
| | Contract Termination Decision Review Committee meetings are not minuted or documented and there is nothing uploaded onto Dynamics confirming the decision. | Confirmation of termination decisions and the rationale for these should be recorded in Dynamics after being discussed with POL Legal so there is a full record of the decision | 21/1/22 - Rationales for decisions currently stored as part of the Case Summary file for all suspension/termination decisions. | Copy of minutes and decision to be kept on Conversant case record | 13) build into SOPs as 4 above | 13) as 4 above and specific dates also impacted by prioritisation of Contracts team when compared to other teams | |
| | Whilst the team receive training on the contractual aspects of their role there is no specific investigations training, especially in relation to evidence gathering and document handling, and financial crime and tipping off | Investigations training should be conducted on a regular, periodic basis and include all of those individuals responsible for conducting investigations. | 21/1/22 - Any training offered to the Contract Advisors in respect of investigations needs to be co-ordinated with training offered to other teams | Investigations training should be developed and provided by CIU investigators. | 14) Structure, approaches, record keeping, decision making, and evidence collection training to be developed and delivered for business-based investigators by CIU investigators | 14) Within two months of appointment of CIU investigators develop material for business-based investigators for delivery over the following 6 months | |
| | The use of Dynamics is limited to logging cases, recording outcomes and uploading and storing documents. | Understand the additional functionality of Dynamics to ensure it is being used to its full potential | 21/1/22 - The provision of MI is being reviewed with the view that reporting provisions will be in place for Q1 2022/2023 | The of Conversant has additional functionality available such as task setting. | 14) Discuss functionality of Conversant with supplier | 14) Meeting scheduled for 04/04/2022 | |
| Customer Complaints | • There is limited guidance on when additional information is required from the product teams, but rather the process relies on Complaint Advisors experience. | • The process document should be updated to clarify when and where additional information should be obtained. | 26/01/22 - These components form part of our improvement plan for customer complaints. | Triage and WB can brief the Complaints team as to what information they need which can be cascaded to product teams | 15) as 4 above | 15) dependent on priority of Complaints team in roll-out | |
| | There is no guidance on when other teams such as Legal should be advised of issues. | The process document should also be updated to clarify instances when Legal consultation would be appropriate. | To support that work I am in the process of recruiting a Head of Complaints (due to start in April), this role will be critical in owning policy, driving process improvement and improving the viability and focus on complaints. Given time to onboard, undertake a gap analysis and then deliver change, I expect most of the deliverables to be H2 of next year. | Legal to provide guidance to Complaints team. Triage can also be a trigger point backstop for directing "Notify" reporters to the appropriate Legal team member | 16) Legal to provide guidance to Complaints | 16) Determined by Legal resource | |
| | • There is no guidance provided to Area Managers over reporting requirements and there are inconsistencies in the quality received. | • Guidance on reporting requirements should be provided to the relevant product teams and Area Managers setting out the information and supporting documentation requirements of the Complaint Advisors. | as above | Triage and WB can brief the Area Managers as to what information they need which can be cascaded to product teams | 17) as 4 above | 17) dependent upon priority of Area Managers in roll-out | |

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| | There is no formalised commitment for what can and will be actioned by the Area Managers so there is no guarantee that specific concerns will be addressed. | A formalised commitment should be agreed with the Franchise Partnering Director setting out the concerns that Area Managers are expected to address | as above | Roles need to be agreed | Discussion with in-coming H of Customer Complaints and Franchise Partnering Director with H of CIU participating? | tbc | |
| | Quality assurance reviews over the complaint outcomes are usually undertaken monthly by the Team Leaders who provide feedback to the individual Complainant Advisors. However, due to capacity constraints this has not occurred for the last few months. | Robust quality assurance is crucial in ensuring consistency and quality of investigations and this process should be reinstated as soon as possible. | see above | CIU staff should conduct coaching for business-conducted investigations and also conduct QA reviews each month across all business teams conducting investigations (with Complaints team management?) | 18)QA framework to be developed and mechanism for access to coaching to be agreed | 18) within two months of CIU investigators being recruited | |
| | The team monitor complaints for each branch to identify any issues or lessons learnt that need to be fed back to Area Managers. However, there is no guidance on what constitutes an issue and there is no feedback mechanism in place to check whether the issues are addressed by the branches | <ul style="list-style-type: none"> The process for monitoring issues and trends should be automated and clarity provided over what constitutes an issue. | see above | The Assessments team to produce periodic reports by area, team, issue etc as required | 19)discussion with H of Customer Complaints to establish need | 19) when in post and WB, Triage, & Assessments team established | |
| | <ul style="list-style-type: none"> Area Managers / other departments can be investigators for customer complaints. Although this provides a good understanding of the relevant business area/ branch, it does mean that there could be a lack of (or perceived lack of) independence between the investigator and the subject of the investigation. | Market practice would be to have either fully independent investigators or a robust formal process to confirm independence by the investigating manager and certain types of case performed by independent investigators of the appropriate grade | See above agree with the principle, however suspect it will be unrealistic other than in high profile cases. My suggestion is that we would tackle this through policy, process, training and some form of QA / oversight. This is an area we can discuss as we progress, presumably with the new head of investigations. | CIU can provide training to Area Mgrs and other managers in different teams who conduct Customer Complaint investigations. This could be as strong as "licencing" those managers and that only CIU-approved managers can conduct these investigations | 20) for discussion | 20) before agreeing structure and approach | |
| | There is no formal requirement for an investigating manager to confirm that they believe themselves to be sufficiently independent to undertake the investigation | as above | | a declaration in the ToR can cover this and should also be considered by the person appointing the investigator in the business. If referred to CIU or WB team then this is not an issue | 21) include in template development | 21)once CIU investigators are appointed | |
| | The team do not have a formal training plan. They are provided with adhoc training by team leads and the Commercial Contact Centre Manager. | A formal training plan should be created. In particular, this should provide more detail on the Customer Complaints handling process, guidance on reviewing information provided by product teams and Area Managers and general investigations training. | see above | Investigations training should be developed and provided by WB investigators and CIU investigators | 22) Structure, approaches, record keeping, decision making, and evidence collection training to be developed and delivered for business-based investigators by CIU investigators | 22)Following appointment of CIU investigators in line with priority ranking | |
| | When an investigation is undertaken by an Area Manager they record their findings in Qualtrics, and the text has to be manually uploaded by the Issue Resolution team into Dynamics as a 'note' or 'activity' to ensure that the full detail of the case is recorded in Dynamics | Consideration should be given as to whether Area Managers can record findings directly into Dynamics, to ensure investigations are consistently documented | see above | Use Conversant to manage the investigation so all data is in one place – business investigator may need support from Triage and/or CIU | 23) agree ways of working with new H of Customer Complaints | 23)upon appointment of H of Customer Complaints and CIU staff | |
| Modern slavery | | | | This is an important topic but has a very established and specific process map. Due to this, the subject data requirements relating to modern slavery should be incorporated into our data collection from the working group and CIU can assist the external investigations team as necessary and MI can be produced if required for the working group and wider organisation. | | | |
| Data Protection | | | | The root cause "investigation" relating to data protection issues and the connected impact assessments falls outside the scope of our work unless there is a suspicion of criminal activity, largescale or organised theft of data, or an expectation that action would be taken against a party other than disciplinary action for breaching policies etc. CIU could also provide general training on structure, decision making, record keeping etc so that there is consistency and standardisation across POL investigations. | | | |

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| Whistleblowing | <ul style="list-style-type: none"> The Whistleblowing Manager triages cases when they are received based on her experience. | <ul style="list-style-type: none"> Formal documentation of criteria for triaging would allow consistent interpretation of what should be categorised as low or high risk. | The new Conversant platform allows for the categorisation of all reports received. | Categorisation of cases should be laid out in a policy revised annually together with different response levels linked to the categories. The rationale for adopting or not a report should be recorded in a standard format. Identifying PIDA qualifying reports need to be built into the functionality of the system so non-whistleblowing reports can be managed differently. | 24) Discuss with Conversant how functionality can be tweaked 25) Risk ratings policy to be developed and agreed by WB Champion | 24) Scheduled for 04.04.2022 25) by end of April 2022 | |
| | There is no documented criteria over each of the risk categories from low to high to ensure a consistent approach is taken and identify where cases may be high risk. | <ul style="list-style-type: none"> The categories should allow for flexibility and be updated as cases are reviewed and individual decisions differ. | | as above | | | |
| | | We understand that the Whistleblowing team is currently in the process of updating processes which will include a formal triage and documented criteria | Procedures for using the Conversant platform and producing MI have been produced following migration to Conversant (which was completed in October), but production of other procedures has been put on hold as the team are moving into a new reporting line | as above | | | |
| | <ul style="list-style-type: none"> The current Whistleblowing policy and process documents do not provide detailed guidance on how to undertake an investigation. Given the number of POL employees who could be asked to undertake an investigation, there is a risk that: | | A new team has been recruited with the requisite skills – all investigations are now undertaken within the team, albeit with technical support by other business areas, when required. | creating a dedicated WB team ensures easier QA over the conduct of investigations | 26) QA to be conducted by WB manager and H of OIU on a quarterly basis and results to be included in monthly MI | 26) to commence April 2022 | |
| | o. Investigating managers only undertake a small number of investigations a year, if any, resulting in a wide range of experience and ability; | | | as above | | | |
| | There could be a lack of consistency in how investigations are undertaken, documented and reported to POL | | | as above | | | |
| | <ul style="list-style-type: none"> We understand that the lessons learnt process is not formally documented or the outcomes collated into a lessons learnt report rather reported on an ad hoc basis as identified. | A formal root cause analysis and lessons learnt structure requiring actions to be agreed and followed up would provide a continuous improvement process which would be beneficial to POL. | | Investigation reports for more serious investigations are now produced. For all investigations findings and recommendations must be recorded and passed to the relevant part of the organisation for consideration. I do not see the role of WB to include following up on recommendation as it is in the gift of the senior accountable leader to decide what to do or not do. Their implementation or not of recommendations should be recorded on the case file however. | 27) JB to check record keeping approach for all risk levels. | 27) end of March 2022 | |
| | Actions are not documented or formally followed up and closed out. | as above | | as above | as above | | |
| | <ul style="list-style-type: none"> There has not been the resource or budget to provide training to those undertaking whistleblowing investigations | <ul style="list-style-type: none"> Investigation training should be conducted on a regular, periodic basis and include all of those individuals responsible for conducting investigations. | | as above | | | |
| | <ul style="list-style-type: none"> Line Managers and Area Managers are the primary investigators for whistleblowing matters. Although this provides a good understanding of the individual concerned and the department / branch in which they work, it does mean that there could be a lack of (or perceived lack of) independence between the investigator and the subject of the investigation. | <ul style="list-style-type: none"> The benefits of having an independent investigation need to be weighed against the work required to amend the collective agreement with the unions (in relation to employee investigations) and the resourcing available for investigations. | Trained independent investigators have been recruited | Team of specialists now in place. No further action required other than refresher training. Care needs to be taken that the WB investigators focus on investigations emanating from WBs rather than becoming general investigators. The establishment of OIU will assist in this as will a more refined use of Conversant. | | | |
| | <ul style="list-style-type: none"> Currently the team uses the Whistleblowing Teams site to hold the excel spreadsheet used to log cases, record the outcome and upload and to store evidence. | We understand that the Whistleblowing team are currently implementing a bespoke case management tool which will be going live at the beginning of August 2021 | All historic cases transferred to new platform | all WB work now conducted using the Conversant platform | | | |
| | <ul style="list-style-type: none"> Whistleblowing MI is manually derived which can take significant time and effort to collate and gives rise to risk of human error. | | All historic cases transferred to new platform | monthly MI is now generated from Conversant. More could be made of this and an annual report could be produced if more qualitative data is extracted | 28) Discuss with WB team how to make more of MI | 28) week commencing 07.03.2022 | |

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| Cyber | Legal are not formally involved although it is possible for an investigator to request a legal opinion | Formal communication lines for specific types of case / risk profiles where privilege / legal consultation is considered to be beneficial should be developed | 21/01/22 - Need threshold definition for this as to when this is involved as not all tickets require the escalation. Elitsham All to work with Legal and HR to set the threshold . | Provision of Legal advice is for Cyber and Legal to sort out. However, where the Cyber team refer or notify Triage of cases the Triage team can seek or advise accessing legal advice | 29) build in to actions as per 4 above | 29) once analyst and contractor are appointed and in priority sequence with other teams | |
| | The Group Head of Cyber operations will liaise with HR when they are made aware of an employee breaching policy. However, we understand that there is no formal process for HR to action these reports meaning that they may not be appropriately assessed and recorded. | • There should be an agreed action plan for HR to take responsibility for deciding on the appropriate outcome of a breach of policy and document their decision and the rationale behind this. • This should be reported as part of their MI and reporting structure to ensure that themes or trends can be identified and addressed. | as above | HR, Cyber, and Triage should agree criteria, thresholds etc for notification and/or referral to Triage of cyber issues | 30) build in to actions as per 4 above 31) MI can be provided as well as periodic Assessments as necessary | 30) once analyst and contractor are appointed and in priority sequence with other teams 31) Analyst to agree MI and Assessment requirements within one month of appointment | |
| | We understand there is no formal quality assurance in relation to the detail of the investigation or the appropriateness of the outcome, however the investigation process is audited by Deloitte and internal audit on a regular basis | • Robust quality assurance is crucial in ensuring consistency and quality of investigations. | as above | CIU can include Cyber in to their QA framework for the purposes of assessing the investigative elements eg structure, fairness, evidence collection, decision making, record keeping, conclusions, recommendations etc Also coaching if required | 32) as per 18 above | 32) within two months of CIU investigators being recruited | |
| HR | • Line Managers are the primary investigators for employee related issues which is specifically codified in the Code of Conduct collective agreement policy. Although this provides a good understanding of the individual concerned and the department in which they work, it does mean that there could be a lack of (or perceived lack of) independence between the investigator and the subject of the investigation. | • The benefits of having an independent investigation need to be weighed against the work required to amend the collective agreement with the unions and the resourcing available to staff investigations. | 24/01/22 - I want the line managers to be the investigating manager sometimes. In a DMB or cash centre where there is a loss of money, it is entirely appropriate that the person on hand can do that investigation quickly – they will of course pass it over for a decision on next steps, but the timeliness of an investigation is key in that sense. Also in grievances... The line manager often is trusted – grievances are about trying to find remedies and resolve informally if possible, and very often, they are the best placed person to investigate and resolve | Grievances/staff complaints - it is usual practice for managers from the business to conduct these as fact finds - better to not use word investigation. CIU can provide support as to how these can be structured in line with the rest of Pol's investigations and training re interviewing, record keeping, decision making etc or source training from companies like CML. This sort of investigation should have only the merest touch from an investigation function. Loss of money is not an HR or people issue - it is a potential crime and requires experienced criminal investigators once an initial fact find has been conducted by local management. This is the sort of incident the Security team would respond to and already maintains reporting on? Agreement is needed with Security as to when Triage is notified or a referral made for CIU allocation. Security team investigators should work to CIU-set standards or are CIU investigators embedded within the Security team depending on volumes of this sort of case. Cash loss is a priority area | 33) Agree thresholds with HR for when they notify or refer matters to Triage 34) establish what Security do when a potential cash loss is identified. Where would CIU bring value and what data is already received and collated by Security's intel team? 35) Ensure common standards, approach, record keeping etc between Security conducted investigations. CIU sets POL-wide standards and approach. 36) Establish a QA process for Security's investigations 37) consider bringing in to CIU investigations and investigators currently in Security discussion required | 33) once analyst and contractor are appointed and in priority sequence with other teams 34) Discussion with Security re their response to cash loss issues and data collection 35) once CIU investigators are appointed and in priority sequence with other teams 36) once CIU investigators are appointed and in priority sequence with other teams 37) before purpose, structure and approach finalised | |
| | | • Market practice would be to have either fully independent investigators or a robust formal process to confirm independence by the investigating Line Manager and certain types of case excluded from the Line Manager allocation and performed by independent investigators of the appropriate grade. | | as above | as above | as above | |
| | • MyHRHelp will review cases which have been logged with them to provide support to the investigators and also engage the People Partner team if there are any deficiencies with documentation or delays in the investigation's progress. They do not provide any assurance over the outcome of the investigation. | • Robust quality assurance is crucial in ensuring consistency and quality of investigations. | 24/01/22 - QA is high on impossible right now. I explained on many occasions in the information gathering stage that investigations under the people policies were greater in number than others, say relating to financial crime. | other than helping structure how HR facts find are conducted, there should be little interaction required with HR in their fact finding work unless they escalate serious issues. What should be notified to Triage or referred to CIU should be agreed. QA could be conducted of fact finds once standard approach is put in place to ensure quality and compliance with organisational approach | 38) thresholds, process etc for notification and or referral to Triage to be established as per 4 above 39) consider designing a QA framework | 38) once analyst and contractor are in place 39) once analyst and CIU investigators in post | |
| | | Market practice would be to have periodic formal quality assurance with a defined output and reporting structure | as above | as above | | | |

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| | <ul style="list-style-type: none"> The manager guidance toolkit requests that all investigating Line managers log their investigations with MyHRHelp, however there is currently no way of monitoring that this happens. As a result there is no complete record of all investigation undertaken within POL. | <ul style="list-style-type: none"> It is crucial that a complete population of employee related investigations can be identified. In regard to DaW and misconduct cases, the PSSC could perform a reconciliation between the cases logged on their spreadsheet and the cases logged with MyHRHelp to ensure that there is a complete population of cases. The People Partner team could also send reminders to managers to ensure that investigations with MyHRHelp are logged. | 24/01/22 - We don't know of every investigation or have sight of all documentation. All that we have is where our managers use the external adviser plus service (My HR) and are assigned a formal case manager. We meet with AdviserPlus regularly for service reviews but beyond that, in both resource and capacity we're limited to what we can do | The organisation must have a reliable record of what "investigations" managers are conducting and of the results. It would be preferable that HR have their own process and tools for this, with Conversant only recording Notifications or referrals. However, if using Conversant is easier and/or cheaper than another solution then Conversant could be used. It would be important to grade the entries to distinguish between fact finds and investigations. | 40) for discussion | 40) before approach and purpose is agreed | |
| | <ul style="list-style-type: none"> POL rely on the case management tool operated by MyHRHelp which is used to log cases, track progress and upload and store documents. | <ul style="list-style-type: none"> A dedicated case management system is not necessarily required however there must be the ability to collect, collate and report a total population of employee investigations. | 24/01/22 - I currently intend to in source this service in 2023 and we will have our own case management system which will both improve MI and give rise to better QA possibilities, but we won't be doing anything until then. | consider above | 41) H of CIU to discuss possible IT solution with senior HR leader | 41) Before end of March 2022 | |
| | <ul style="list-style-type: none"> Despite the Code of Conduct policy recommending that investigators have regular training in undertaking investigations, there has not been the resource or budget to provide this to Line Managers | <ul style="list-style-type: none"> Investigation training should be conducted on a regular, periodic basis and include all of those individuals responsible for conducting investigations. | 24/01/22 - I'd love to be able to give more and better training, but have no budget or resource to do so. With our people policies, literally any manager could be an investigator, so training would have to be really extensive to be meaningful, so until I get that budget, it cannot happen. | CIU could provide training and guidance as to structure, approaches, decision making etc as mentioned above. This could be put on line and could be compulsory for fact finding managers to complete annually. | 42) training material produced with HR for fact finding managers | 42) once CIU investigators are appointed | |
| | <ul style="list-style-type: none"> As all Line Managers could potentially be asked to undertake an investigation, this training would need to be available online and mandatory to complete before commencing an investigation | This training should be mandatory for all new investigators prior to conducting an investigation and completion of full and updates to training monitored and followed up. | as above | as above | | | |
| Financial Crime | None made other than MLRO duties should not change | | | Reporting obligations to the NCA should remain in Fin Crim team as Fin Crim play an important financial intelligence function. However, a discussion is required as to what types of financial crime evidential investigations could and should be passed out of Fin Crim to CIU. With banking services a significant part of POL's business it appears appropriate for POL to conduct a limited number of fin crim investigations where our Postoffices are venues. These investigations could be alongside banks' investigations teams or with LEAs but some independent capability seems needed. It is not best practice for FIOs to conduct evidential investigations. | 43) Discussion required with Fin Crim about what they see or have reported to them and what could be spun out as evidential investigations and then an appetite discussion with Dir Compliance. | 43) before approach and model is decided | |
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