

| Royal Mail Group Ltd Criminal Investigation and Prosecution Policy | |
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| 1. | PURPOSE This policy describes Royal Mail Group Ltd response to crime and suspected crime against the organisation. |
| 2. | LINK TO ACCOUNTABILITIES Criminal Investigation Team PO Ltd Investigation Team PFWW Investigation Team Criminal Intelligence and Support Team Planning and Development Team Criminal Lawyers |
| 3. | POLICY |
| 3.1 | Policy Royal Mail Group will investigate crime and suspected crime against the organisation, identify offenders, highlight factors that facilitated crime and take appropriate action - not excluding prosecution. 3.1.1 Protecting the Integrity of the Mail This policy supports the Postcomm Code of Practice "Protecting the Integrity of the Mail" section 6.3 (c) in preventing and detecting criminal loss, theft and interference with 'Code Postal Packets'. 3.1.2 Protecting the Business This policy supports paragraphs 15, 'Security and Trust' and 22, 'Preventing and Reporting Crime' in the Code of Business Standards. Furthermore, in highlighting crime facilitators, investigations will identify (i) non-compliance with security procedures, (ii) non-compliance with the code of business standards (iii) poor management and (iv) shortcomings in physical security. 3.1.3 Policing Crime Royal Mail Group Security Investigation Teams are the providers of in-house investigations and will maintain the lead in all dealings with the Police. 3.1.4 Conduct of Investigations The conduct, course and progress of an investigation will be a matter for the investigators as long as it is within the law, rules and priorities of the business. Investigators will ultimately report to the Director of Security with regard to the conduct of criminal investigations. 3.1.5 Role of Royal Mail Employees Royal Mail employees are expected to maintain a high standard of integrity and whatever their position in the company, are expected to assist investigators with their inquiries. Employees have a duty to; (i) report crime against the business and suspicion of crime against the business to the Security Helpdesk ([REDACTED] GRO) or Crimestoppers on [REDACTED] GRO , even if the employee wishes to remain anonymous (ii) report to the company if they are charged, cautioned, summonsed or convicted |

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| | <p>in connection with any criminal offence.</p> <p>3.1.6 Prosecuting Criminals</p> <p>This policy supports the Code of Business Standards in normally prosecuting those who commit theft or fraud and where appropriate offences against the Postal Services Act 2000 Sections 83 and 84.</p> <p>Criminal investigations will be conducted in accordance with the procedures and to the standards required by legislation, case law and the courts.</p> <p>3.1.7 Procedures and Standards</p> <p>Criminal investigations will be conducted in accordance with legal powers, restrictions and guidelines provided by the government or governed by Royal Mail policies (see para 3.2).</p> | | | | |
| 3.2 | <p>Procedures and Standards</p> <p>3.2.1 Gathering Intelligence</p> <p>Investigators and colleagues in Criminal Intelligence will adhere to the principles of the Data Protection Act 1998, The Data Protection (Processing of Sensitive Personal Data) Order 2000 and the Code of Practice for the Management of Police Information when acquiring, retaining, storing and disclosing intelligence.</p> <p>The P6 process will be adhered to when accessing the computer or official telephone records of employees.</p> <p>As the Communications Data Order 2003 scheduled Royal Mail as a public authority for the purposes of the acquisition of communications data, the Regulation of Investigatory Powers Act (RIPA) Code of Practice for the Acquisition and Disclosure of Communications Data will be adhered to for the purposes of RIPA Part 1 Chapter 2.</p> <p>Anonymous informants will be recorded on the Information Source Register. The Police will handle any person likely to become a Covert Human Intelligence Source and investigators will adhere to the Covert Human Intelligence Sources Code of Practice.</p> <p>3.2.2 Conducting Enquiries and Exhibit Management</p> <p>Evidence will be gathered and retained in accordance with the Criminal Procedure And Investigations Act 1996 (S. 23(1)) Code Of Practice.</p> <p>3.2.3 Safety and Planning</p> <p>In accordance with The Management of Health and Safety at Work Regulations 1999, a Safe Working Practices Committee will conduct an annual risk assessment of investigatory duties reviewing existing, and setting new controls and measures where required. Investigators will adhere to these controls and measures.</p> <p>Investigators will plan for and assess the risks of all investigation operations (with the exception of responses to immediate events) using the PORA operational planning tool: Planned Operation Risk Assessment.</p> <p>3.2.4 Surveillance and 'Testing'</p> <p>The Regulation of Investigatory Powers Act 2000 Schedule 1 Part 2 lists Royal Mail as a public</p> | | | | |

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| <p>authority for the purpose of conducting directed surveillance. Directed surveillance will be carried out according to the Regulation of Investigatory Powers Act 2000 Part 2 and the Covert Surveillance Code of Practice.</p> <p>Where appropriate 'tests' may be applied to the honesty of individuals suspected of crime. Authorised 'testing' will be carried out in accordance with investigation guidelines.</p> <p>3.2.5 Approach and Arrest</p> <p>Suspects will be dealt with in accordance to the Police and Criminal Evidence Act 1984, in particular the 'Code Of Practice For The Detention, Treatment And Questioning Of Persons By Police Officers'.</p> <p>3.2.6 Interviewing</p> <p>Suspects will be interviewed in accordance to the Police and Criminal Evidence Act 1984, in particular the 'Code Of Practice On Tape Recording Interviews With Suspects'. Suspects who are employees are entitled to the additional rights provided for in the Royal Mail Conduct Code.</p> <p>3.2.7 Searching</p> <p>Searches will be carried out in accordance to the Police and Criminal Evidence Act 1984, in particular the 'Code Of Practice For Searches Of Premises By Police Officers And The Seizure Of Property Found By Police Officers On Persons Or Premises'. Suspects who are employees are entitled to the additional rights provided for in the Royal Mail Conduct Code.</p> <p>3.2.8 Casework</p> <p>Investigations leading to potential prosecution will be reported in accordance with the Criminal Procedure And Investigations Act 1996 and the Criminal Procedure And Investigations Act 1996 (S. 23(1)) Code Of Practice.</p> <p>3.2.9 Prosecution</p> <p>Suspect offenders will be prosecuted where there is sufficient evidence and it is in the public interest in accordance with the Code for Crown Prosecutors. Decisions to prosecute in non-Crown Prosecution Services cases will be taken by nominated representatives in the business with consideration to the advice provided by the Royal Mail Group Criminal Law Team.</p> <p>3.2.10 Conduct and Oversight of Investigations</p> <p>Royal Mail Group Security employees perform a vital role on behalf of the public, the Criminal Justice system and Royal Mail Group Ltd customers and employees. These stakeholders must have absolute confidence in the integrity, conduct and professional status of Investigators.</p> <p>This means adherence to the laws, regulations and codes along with their respective Procedure and Standards referred to above.</p> <p>Complaints should be forwarded in the first instance to either the Head of Investigations (Royal Mail, PFWW or POL) or to the Complaint Manager (RMLS Policy, Standards and Investigation Support Manager) or his nominated deputy for initial assessment and selection of the business procedure, namely Criminal Investigation, Grievance Procedure, Conduct Code or the Bullying and Harassment procedure.</p> | | | | | |

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| | <p>3.2.11 Scots Law and Northern Ireland</p> <p>Paragraphs 3.1 to 3.2.10 all apply to Scotland and Northern Ireland except where specifically articulated in Scots law, Northern Ireland Statutory Instruments or by the Northern Ireland Assembly, Procurator Fiscal or Director of Public Prosecution (NI) guidelines.</p> | | | | | | | | | | | | | | | | | | |
| | <p>3.2.12 Post Office Ltd Investigation</p> <p>While adhering to legislative and group policy requirements, the POL Investigation team have additional and, in some cases, alternative Procedures and Standards, and supporting documentation with which Post Office Ltd colleagues will comply. Post Office Ltd Investigation team will maintain a separate casework procedure and database.</p> | | | | | | | | | | | | | | | | | | |
| 4. | <p>Deployment</p> <p>This Policy is published on the Royal Mail Intranet site as policy No. S2.</p> <p>The procedures to investigate crime against the Royal Mail Group have been in existence for many years and are regularly reviewed in response to changes in legislation.</p> <p>Investigation Procedures and Standards relating to this policy are included in the induction and ongoing training courses and material provided to investigators. Any changes to the procedures and standards are notified to investigators via investigation circulars and communications.</p> | | | | | | | | | | | | | | | | | | |
| 5. | <p>Compliance</p> <p>Reports of Incidents of crime or suspected crime are evaluated, categorised and prioritised for investigation by the Criminal Investigation Casework Teams.</p> <p>The Casework teams report on volumes of investigations, RM/POL/PFWW products, processes and services affected, and types of offences and outcomes of prosecutions.</p> <p>The Casework Teams monitor compliance with investigatory procedures and standards.</p> <p>Complaints will be investigated as per the complaints procedure.</p> | | | | | | | | | | | | | | | | | | |
| 6. | <p>Monitoring</p> <p>Representatives from Group Security, Criminal Law and the business unit investigation teams will review this policy at least annually.</p> <p>In addition The Criminal Justice Inspection Northern Ireland will conduct an occasional review of all investigatory processes in Northern Ireland.</p> | | | | | | | | | | | | | | | | | | |
| 7. | <p>Contract Manager</p> <p>Not applicable.</p> | | | | | | | | | | | | | | | | | | |
| 8. | <p>Document details</p> <table><tr><td>8.1</td><td>Author</td><td>Ray Pratt</td></tr><tr><td>8.2</td><td>Owner</td><td>Head of Criminal Investigation, RMLS</td></tr><tr><td>8.3</td><td>Enquiry point</td><td>Ray Pratt</td></tr><tr><td>8.4</td><td>Effective from</td><td>1 December 2007</td></tr><tr><td>8.5</td><td>Review date</td><td>November 2011</td></tr><tr><td>8.6</td><td>Last updated</td><td>November 2010</td></tr></table> | 8.1 | Author | Ray Pratt | 8.2 | Owner | Head of Criminal Investigation, RMLS | 8.3 | Enquiry point | Ray Pratt | 8.4 | Effective from | 1 December 2007 | 8.5 | Review date | November 2011 | 8.6 | Last updated | November 2010 |
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| 9. | Assurance Details | |
| 9.1 | Name | Tony Marsh, Phil Gerrish, Rob G Wilson, Roger Duckworth, Ray Pratt, Simon Ramsden, Marcus Copper, John M Scott |
| 9.2 | Business Unit | Royal Mail Group |
| 9.3 | Assurance Date | October 2005 |
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