

Assurance Review – Recruitment (Vetting & Training)

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Circulation

Tony Hills	Senior Field Support Manager	For Action
Sarah Rimmer	STL – Agent Services	For Action
Michael Dadra	Compliance Standards Delivery Specialist	For Action
Andy Marsland	Security & Vetting	For Information
Ali Piper	Head of HR Services	For Information
Lynn Hobbs	General Manager Network	For Information
Martin Ferlinc	Risk & Assurance Manager	For Information
Keith Woollard	Head of Compliance	For Information

Report Information

Author:	Rob Bolton	Assurance Advisor
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Authorised by:	Martin Ferlinc	Risk & Assurance Manager
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1. Introduction

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This assurance review was performed in response to an audit performed by our external auditors in 2008 on behalf of NS&I. The purpose of this assurance review was to examine the processes to instigate and record vetting, induction training and ongoing product training of branch staff (employees and agents). This report documents the findings, conclusions and recommendations identified. I would like to express my thanks to those people who were involved during this review for their support and co-operation.

2. Background

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An audit performed by our external auditors (Ernst & Young), on behalf of National Savings & Investments (NS&I), in 2008, highlighted difficulties in being able to demonstrate that all staff (employees and agents) had received induction training (or ongoing product training). The audit by Ernst & Young also highlighted that staff with access to Horizon did not appear on training records and that Horizon user lists were not always up to date. Although not concluded from that audit, this highlighted a risk that staff working in branches may not be registered and adequately vetted.

3. Headline Findings

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- There is an established vetting system with clearly defined supporting processes although there are some deployment issues, as the P356 data held in Farnworth identified staff not registered with HR
- The vetting of agency branch assistants is dependant on subpostmasters completing the P250, which is not always the case, leading to potential for unregistered people to have access to Horizon system
- Improvement noted in training data held for agency branches but still a number of issues relating to:
 - Inconsistency in information and forms and quality of completion
 - Lack of adherence to process
 - No record of action taken to address weaknesses identified as part of training
- No induction training records maintained for agency branch assistants
- Lack of clarity regarding training records for crown office counter staff, as a result of the process not being defined or understood
- Training and supporting records exist for crown office FSS joiners

4. Management Summary

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Overall, a defined vetting system exists within Post Office Limited supported by clear processes and supporting documentation, including handbooks, guidelines and policies relating to both Post Office Limited and Royal Mail Group. The Ernst & Young audit identified that there were issues with the registering of agency staff and this was still found to be a potential issue as the vetting of agency assistants is dependent on the P250 being completed by the Subpostmaster. This is not always the case resulting in unregistered staff having access to the Horizon system (a sample check performed during this review revealed a number of staff working in agency branches not registered with HR).

A sample check of training records held for Subpostmasters indicated an improvement from the findings of the Ernst & Young audit but there are still a number of issues relating to agency training documentation and processes. Inconsistency in the forms used, the completion of the documentation and the processes being followed were noted. Although regulatory training records are maintained for agency branches this is not the case for other training and there is currently no requirement for Subpostmasters to maintain training records for their staff. Training processes and documentation were noted relating to the recently recruited Financial Services Specialists (FSS) but there is still a lack of clarity regarding training records for crown office counter staff, due to the process not being thoroughly defined and understood.

5. Detailed Findings

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Vetting

Discussions with people involved in the process were conducted as part of this review and these revealed that recruitment checks, including vetting, are performed to some degree on all Post Office Limited joiners. The extent of these checks is dependent on the nature of the role being applied for, e.g. a member of staff employed in the cash delivery area will have far more stringent and extensive vetting checks than someone employed in an administrative role within an office environment. It was noted that there is a Vetting Policy and a Vetting Handbook and these are extensive documents that provide the necessary information and guidance relating to vetting and recruitment checks. They identify the checks that are required to ensure that an individual:-

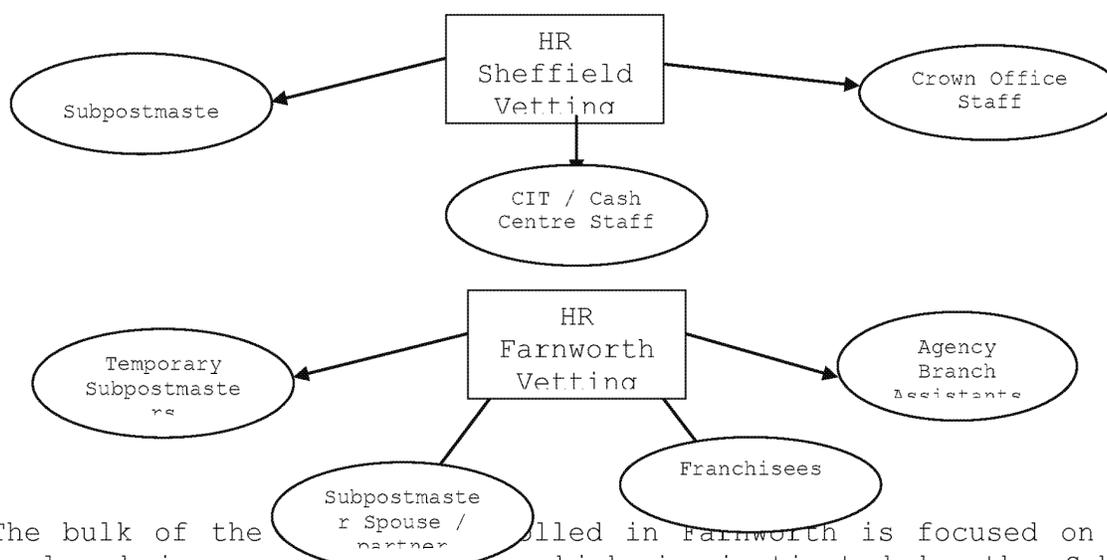
- Has the right to work in the UK
- Is who they claim to be
- Has a discernible activity history
- Does not possess a current criminal record check
- Is of good character

The documents also identify the content and requirements of these checks, e.g. there is a list of acceptable documents to confirm the right to work in the UK. The level of vetting and recruitment checks is identified in a matrix which lists job roles within the Business and the category of checking that must be applied to joiners to these areas (see Appendix A).

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Where possible, all security checks, including the stage 2 criminal record check, are performed before employment commences but it was noted that in line with the rest of Royal Mail Group, Post Office Limited operates a "Best Endeavour" policy. This allows employment to commence before the criminal record check clearance is completed but on the understanding that, if the criminal record check is subsequently failed, the employment is terminated. This is due to the length of time often taken for criminal record checks to be returned conflicting with the actual need for someone to be employed.

The vetting checks are controlled via Human Resources (HR) based in Farnworth and Royal Mail HR Services based in Sheffield. The checks controlled by each cover different areas of recruitment. However all the security checks are processed via the Security Vetting team in HR Services Sheffield :-



The bulk of the security checks controlled in Farnworth is focused on assistants employed in agency branches, which is instigated by the Subpostmaster completing a P250 form for registering a potential employee. It was noted that often these forms are incorrectly completed (approximately 50% error rate) and have to be returned. The most common errors are :-

- Wrong ID
- Incorrect 5 year history
- Not signed
- Previous surname used
- Wrong name

The potential employee must also complete a P13 (Personal Declaration) which is submitted to the HR centre with the P250. Once a correctly completed P250 is obtained the security checks are instigated and the Subpostmaster is kept informed of the results from stage 1 and 2 of the checks.

- Stage 1 - debarment checks
- Stage 2 - criminal record check

A potential employee can be temporarily employed if they pass the debarment check stage 1 on the understanding that the employment must be terminated should they subsequently fail the stage 2 criminal record check. Although the results of checks are communicated to the subpostmaster at every stage, identifying what action should be taken, there is no follow up to confirm that anyone who fails the stage 2 check

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is not still employed at the branch and no information is provided or escalated to other areas of the Business relating to problems or errors in the vetting processes e.g. consistent errors in completing P250, not submitting P250s

The HR Centre maintain records of all checks and also of staff employed at branches (P356 database) and an ongoing annual verification of the P356 is performed on a weekly basis over a rolling 48 week period. Whilst any failings noted as part of the P356 verification (ie. Staff found to be working in a branch not registered with HR) are rectified this information is not escalated to other areas of Post Office Limited. The P13 and P250 forms together with any information relating to the security checks that have been passed are held in the admin offices in Leeds whilst the documentation relating to failed checks is held in Farnworth. Farnworth have documentation dating back to 2005 and this is contrary to the Data Protection Act principle 5 - *Personal data processed for any purpose or purposes shall not be kept for longer than is necessary for any purpose or purposes*. The P13 form itself identifies that the retention period is 1 year and the Vetting Handbook (version 1.4 November 2008) also actually identifies that *"We do not keep information for any longer than is required, in general this is no longer than 3 months"* and *"Once the retention period has elapsed, we will ensure that disclosure information is immediately destroyed in a secure manner"*.

Whilst the vetting and registering of assistants process is fairly robust and well managed within the HR Centre, it is dependant on the Subpostmaster registering new staff via the P250 form and this is not always the case. A sample check was performed as part of this review of the P356 data held in the HR Centre against the actual staff working in 10 branches and, of these, 7 branches were found to have assistants working on the counter not identified on the P356 record maintained by the HR Centre or assistants identified on the P356 no longer working at the branch.

This means that there are staff working at agency branches with Horizon user IDs and access to the system not registered with the HR Centre and this has implications for Post Office Limited and its obligations in the areas of mails integrity. This also impacts on Post Office Limited being able to demonstrate to clients such as NS&I that staff are registered and are suitably trained in both the regulatory and product knowledge areas related to their product.

Branch	Code	Number of assistants at the branch not recorded on P356	Number of assistants recorded on P356 but no longer at the branch
Watts Lane	378420	None	None
Woolton	392420	None	None
Garston	224420	None	4
Hunts Cross	248420	1	2
Booker Avenue	372420	3	1
Allerton Road	157420	1	1
Leece Street	375420	1	None
Monument Place	164420	None	3
Lawrence Road	447420	None	None
Sussex Road	283427	None	24

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There is also an issue relating to nominee type branches where a number of people are registered to work in more than one branch on a single P250. This is usually related to Area Managers who cover for holidays and sickness at a number of branches. This again has implications for the registering of staff and the HR Centre is currently looking at this issue to develop a more user friendly solution as, currently, there is no formal process for this situation. At present these branches write to the HR Centre to inform them if a member of staff is to be moving to a different branch within the same company but this is not formalised and is rather ad hoc in nature.

The same vetting processes are applied to Subpostmasters and crown office staff as per the vetting matrix but these are actioned from the application through the IRIS system and are therefore directly controlled from the HR Centre in Sheffield. A sample of crown office staff and Subpostmasters who have joined between June and August was checked and all the security checks had been recorded.

Crown Office:

Name	Object description	FAD	Entry	Criminal Record Check	Stage 2 clearance
GRO			01/06/2009	Yes	08/06/2009
			01/06/2009	Yes	28/04/2009
			01/06/2009	Yes	12/05/2009
			15/06/2009	Yes	11/05/2009
			15/06/2009	Yes	20/05/2009
			06/07/2009	Yes	06/07/2009
			06/07/2009	Yes	02/07/2009
			06/07/2009	Yes	30/06/2009
			06/07/2009	Yes	02/07/2009
			06/07/2009	Yes	03/07/2009
			13/07/2009	Yes	10/07/2009
			20/07/2009	Yes	06/07/2009
			27/07/2009	Yes	23/07/2009
			27/07/2009	Yes	27/05/2009
			10/08/2009	Yes	09/07/2009
			17/08/2009	Yes	03/07/2009
			17/08/2009	Yes	06/08/2009
			24/08/2009	Yes	12/05/2009

Subpostmasters:

Name	Object description	Office FAD	Entry	Criminal Record Check	Stage 2 clear
GRO			02/06/2009	Yes	13/02/2009
			04/06/2009	Yes	24/04/2009
			10/06/2009	Yes	26/05/2009
			17/06/2009	Yes	26/02/2009
			26/06/2009	Yes	27/05/2009
			30/06/2009	Yes	06/04/2009
			08/07/2009	Yes	10/06/2009
			10/07/2009	Yes	09/06/2009
			16/07/2009	Yes	18/05/2009
			21/07/2009	Yes	28/05/2009
			30/07/2009	Yes	26/06/2009
			04/08/2009	Yes	16/04/2009
			11/08/2009	Yes	29/06/2009
			18/08/2009	Yes	02/07/2009
			25/08/2009	Yes	08/07/2009

Training

Discussions during this review identified that new entrants to Post Office Limited receive induction training appropriate to the role they are taking up and personnel working in the branch network, within both agency and crown offices, need to be trained to perform the required range of counter duties. This training is delivered through a combination of formal classroom based training (by a Post Office trainer) and on site support (delivered by either a Post Office trainer or a local manager). Any training required subsequent to induction is performed through a variety of other methods such as Work Time Listening and Learning (WTLL), workbooks and local training by the Subpostmaster or the Branch Manager.

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The content of training is reviewed to ensure it remains current and relevant to the product and this review can be instigated by clients, product managers, other business departments or via the HLBP/PACE process. New training or changes to training content are signed off by the client or by Network depending on the source of the request, either external or internal.

A training process for both crown office staff and Subpostmasters was noted and this includes identifying the training required, performance of the training and also the further support activities as required. At the end of any classroom training a Performance Standards Assessment (PSA) is completed that identifies the performance of the delegate against the training areas and this is used to identify any learning weaknesses. This provides information to a Crown Office Branch Manager (BM) or it feeds into a Learning Action Plan (LAP) for a Subpostmaster which is provided to the trainer for use in the onsite support provided following the classroom training. The identified process for the retention of the PSA is :-

- Crown Office - PSA given to BM by the delegate and held in individual's file in the branch
- Agents - PSA is given to the trainer for use in onsite support and other post transfer support activity with copies held by Contract Support Team and trainer's line manager. The PSA and other training documentation are held on a Lotus Notes Electronic Filing Cabinet (EFC), organised by BDM areas.

Following any classroom training for crown office staff it is the responsibility of the BM to provide any further onsite training to cover any identified learning weaknesses. For Subpostmasters any learning weaknesses are identified via the PSA and the LAP and these are included in the number of post transfer support activities that are provided including two post transfer telephone calls (PTC) and a post transfer visit (PTV). It was noted that guidance is provided to field support advisors on the training process and the completion of the PSA and the LAP, including the scoring system, the development of the LAP and the instructions for the transfer or retention of any documentation.

Through discussions conducted as part of this review, it was revealed that induction training records are left at agency branches, which could be subsequently viewed as required. The PSA guidance completion notes identify that the Learning Action Plan should be left with the Subpostmaster but there is no reference to other documentation being left at the branch, including the PSA. Whilst the Learning Action Plan is a training document, it does not identify the training or the performance of the Subpostmaster across all areas of training provided but is focused on the further actions required for the development of the Subpostmaster.

The PSA guidance completion notes actually identify the following instructions for training documentation:

Document Instructions

Classroom Training followed by on-site training:

- Performance Standards and an Action Plan will be sent by OFS (formerly TDT) to the trainer who will be delivering the classroom training
- The classroom trainer asks the trainee to complete Unit 1 of the Performance Standards with what sessions have been covered, as they go through the course.
- At the end of the classroom training, the trainer will ask the trainee to complete the Interim Action Plan and hand the form back to them.
- The Trainer then puts the form in an envelope, seals it and addresses it FAO the on-site trainer.
- The classroom trainer then gives the sealed envelope to the trainee and asks them to give the envelope to their on-site trainer on the first day of their on-site training.

On-Site Training only:

- Performance Standards and an Action Plan will be sent by OFS to the trainer to complete.

At the end of the on-site training, the trainer will need to do the following:

Action Plan

- Make 3 copies.
- The original is left with the Subpostmaster.
- A copy is sent to Contract Support Team, GRO
- A copy is sent to the OSFA's line manager.

GRO

Performance Standards

- Make an electronic copy.
- Email to Contracts Support Team, copy in your Line Manager and Outlet Field Support.

A sample of three field support advisors were questioned as part of this review and all identified that following completion of the onsite support electronic copies of all documentation would be forwarded to outlet field support via a generic email address for uploading to the Electronic Filing Cabinet (EFC) for the branch. They also advised that a hard copy of the action plan would be left with the Subpostmaster but all other documentation would either be taken away or destroyed. Their perception was that anyone who wanted to access the training records for a particular Subpostmaster would do so via the EFC rather than through the actual branch. It was also noted during the sample check that numerous versions of the different forms were being used and varying standards of completion were evident.

The audit performed by Ernst & Young identified that records of any training were not always available and a sample of 25 Subpostmaster

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entrants in the period June to August was therefore checked against the records held on the EFC. Whilst a process was found to be identified with supporting documentation and guidance provided to the field support advisor it can be seen that some gaps in process and the completed documentation were noted :-

- Different versions of forms used
- PSA not fully completed
- Weaknesses identified on PSA not reflected in a corresponding action on the LAP
- PSA or LAP not uploaded to the EFC

Branch	Code	Training Delivered to Date	Records Maintained	Comments
Kitt Green	295406	Classroom 10 days Onsite Support 6 days 1st PTP, 1st PTV	Performance Standard Assessment (PSA) Learning Action Plan 1st Post Transfer Phonecall (PTP) record 1st Post Transfer Visit (PTV) record	No comments
Bradfield PO	168340	Classroom, Onsite Support, 1st PTP	PSA and 1st PTP	No Learning Plan posted although some failings noted on PSA. 1st PTP identifies that learning plan discussed but no record of outcome of these discussions. No record of PTV so not able to determine if completed although originally scheduled for 17 September
Toppesfield PO	177116	Classroom, Onsite Support, 1st PTP	PSA, Learning Action Plan and 1st PTP	Record of 1st PTP has question marks in all the sections of the Post Transfer Contact section hence not clear if Learning Plan or training has been discussed. No record of PTV so not clear if been completed although scheduled for 18 September
Oughterside PO	229410	Classroom, Onsite Support, 1st PTP, 1st PTV	PSA, Learning Action Plan, 1st PTP and 1st PTV	Post Transfer Contact section in 1st PTP record not completed so no information regarding the discussion of learning plan or training
Leverington PO	330230	Classroom, Onsite Support, 1st PTP	PSA, Learning Action Plan and 1st PTP	Different version of PTP record used
Hampton-In-Arden PO	284246	Classroom, Onsite Support, 1st PTP (& intervention visit)	Learning Action Plan, 1st PTP, Intervention Request Documentation	A PSA is on the site but can't be accessed, when viewed the doc is actually a link to a mails integrity document. An intervention request raised on this branch for further training and this completed in August by visit to branch
Chellow Grange PO	174306	Classroom (module 2 only), Onsite Support, 1st PTP	PSA, Learning Action Plan, 1st PTP	No output from discussions about Learning Plan and a few areas of improvement highlighted including NS&I products
Hurstpierpoint PO	082907	Classroom, Onsite Support, 1st PTP	PSA, Learning Action Plan, 1st PTP	No output from discussions about Learning Plan
Sedgley Park PO	350422	Formal training cancelled 1st PTP completed	1st PTP	No classroom or onsite support provided as not required - confirmed by Contracts Manager (email on EFC)
Penwortham Hill PO	225427	Classroom, Onsite Support, 1st PTP	PSA, Learning Action Plan, 1st PTP	No correlation between Learning Action Plan and PSA. No information on follow up discussions covered at 1st PTP

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Painswick PO	320523	Nothing on the EFC to identify dates of classroom training or identify if Onsite support provided or the 1st PTP	PSA, Learning Action Plan (unsigned)	PSA and Learning Action Plan on EFC to support classroom training delivered but this not identified on EFC as being provided. Learning Plan has not been signed by the Agent. No record of 1st PTP so can't confirm if completed although down as 18th August
High Farm PO	255329	Classroom training and onsite support cancelled (emails on Efc to support this), 1st PTP completed	1st PTP	No assessment on standard made following 1st PTP - no Learning Action Plan ?
Wortley PO	330340	Classroom, Onsite Support	PSA, Learning Action Plan	No record of 1st PTP although scheduled for 20th August
Stoke PO	248238	Classroom training already provided but nothing on EFC to support this ie. PSA or Learning Action Plan	1st PTP	No PSA or Learning Action Plan from classroom training and no reference to output of discussions related to this at 1st PTP
Silsoe PO	113106	Nothing to support if classroom training or online support delivered. 1st PTP completed	1st PTP	No PSA or Learning Action Plan from classroom training and no reference to output of discussions related to this at 1st PTP

Branch	Code	Training Delivered to Date	Records Maintained	Comments
Chester Road West PO	153343	Classroom, Onsite Support	PSA, Learning Action Plan	No record of 1st PTP although scheduled for 7th September. No correlation of PSA to Learning Action Plan
East Hanningfield PO	065114	Sales training and onsite support only (info on EFC to support this), 1st PTP	1st PTP	No Learning Action Plan or PSA although only sales training delivered
Craiglockhart PO	129824	Classroom, Onsite support and 1st PTP	PSA, Learning Action Plan, 1st PTP	No output from PTP discussions in relation to Learning Action Plan
Penygraig PO	398611	Classroom, Onsite support	PSA, Learning Action Plan	No record of 1st PTP although scheduled for 17th September
Hinchley Wood PO	071023	Classroom, Onsite Support, 1st PTP (& intervention visit)	PSA, Learning Action Plan, 1st PTP, Intervention Request Documentation	Learning Action Plan not signed by Agent. An intervention request raised on this branch for further training and this completed in September by visit to branch. Some 4 scorings on PSA not reflected on Learning Action Plan
Ranworth PO	501136	Classroom, Onsite Support, 1st PTP	PSA, Learning Action Plan, 1st PTP	PSA and Learning Action Plan not completed fully
Harworth PO	188311	Classroom, 1st PTP (nothing to confirm if Onsite support completed)	PSA	No Learning Action Plan although some 4 scorings identified on PSA. No record of PTP although scheduled for 26th August
Swindon PO	185208	Classroom, Onsite support	PSA, Learning Action Plan	PSA and Learning Action Plan not completed fully
Ben Rhydding PO	161306	Classroom, Onsite support	PSA, Learning Action Plan	PSA and Learning Action Plan not completed fully
Ten Acre Street PO	383201	Classroom (nothing to identify if Onsite support provided)	PSA	No Learning Action Plan and PSA not fully completed

The PSA scoring system is based on :

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The

10	Can complete unaided
7	Can complete with minor assistance (aid from trainer, reference materials or helpline, not all aspects of the item have been seen but trainee is otherwise fine)
4 *	Can only complete with major assistance or significant aspects not seen live
-	The subject has been covered, but no transactions have been seen on-site to evaluate on. (Could have been covered in the classroom, or on-site by dummy materials, workbook or COM's etc)

guidance notes identify that any marking of 4 should result in a corresponding action on the Learning Action Plan and in the sample checked this was not always the case. Taking the example of Hinchley Wood PO from the sample checked, the PSA identifies 4 markings for Postal Orders, Parcelforce Worldwide, E Top Ups, Redirection of Mail, Moneygram and Paystation but there are no corresponding actions identified on the Learning Action Plan.

It was confirmed during this review that the PSA is currently being reviewed and it is suggested that this be covered as part of this activity.

A further concern was the lack evidence of any follow up on weaknesses identified in the LAP or the outcomes of any further action taken to address those weaknesses during subsequent post transfer support activities.

Taking the example of Chellow Grange PO :-

The Performance Standards Assessment identifies a 4 making for NS&I Savings Products and there is a corresponding improvement action on the Learning Action Plan. The subsequent Post Transfer Contact (via a telephone call) confirms that the training report, learning action plan and knowledge gaps have been discussed but there is nothing to identify if there has been any improvement from the original scoring or indeed whether the Subpostmaster has actually performed the original action. It is therefore not possible to determine if the action has been completed, has resulted in an improvement or if it is still ongoing or has actually been closed.

The E&Y audit reported that *"Post Office Limited should ensure all branches maintain full induction and regulatory training records for all staff and that these records are accurate, up to date and complete"*. Although currently there are records of regulatory training performed by assistants this is not the case for other training and there is no requirement for Subpostmasters to maintain training records for their staff.

For crown office staff, the process identified is that the Performance Standards Assessment form and action plan are forwarded to and retained by the Branch Manager. A sample of 13 new crown office entrants was therefore examined and it was noted that there was still some confusion amongst the

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Branch Managers as to the requirement to retain the PSA and action plan together with any general training records for individuals working at the branch. The processes and supporting documentation relating to Financial Services Specialists was found to be good and the Area Performance Managers (APM) questioned showed good knowledge and evidence of the processes and documentation and how they would be used and retained. There was also some lack of understanding in evidence of the process for training records when staff move to a different branch together with how the training record would be utilised in the development of the new entrant.

Name	Branch	Code	Entry	Record	Comments
Mrs Jane Ann Camara	Beverley Crown Office	011321	06/07/2009	N/A	Taken on but didn't need training as worked in an agency branch and then contract not renewed
Miss Linzi Rosemary Weatherson	Romsey Crown Office	007546	01/06/2009	Yes	Didn't go to Romsey but went to Waterlooville and then to Eastleigh. Training record went to Waterlooville but had not been transferred to Eastleigh at time of this review
Mrs Linda Ann Crawley	Bridlington Crown Office	007337	17/08/2009	Yes	Completed training assessment form on hand
Mr Neil Colin Bailey	Southend-On-Sea Crown Office	009140	01/06/2009	Yes	Training file on hand and fully completed. BM advised he would send on to new branch if employee was transferred
Mrs Anne Jeanette Hodgskins	Wigan Crown Office	009406	01/06/2009	Yes	Moved to Chorley but training record still on hand at Wigan. Will be transferred in near future
Mr William Westhead	Wigan Crown Office	009406	15/06/2009	No	Started at Wigan but now left the Business. No training record was supplied when he started
Mr Robert Cairns	Darlington Crown Office	011309	06/07/2009	Yes	Training file on hand and fully completed. APM advised he would send on to new branch if employee was transferred
Ms Yvonne Carol Lister	South Shields Crown Office	021329	06/07/2009	Yes	Training file on hand and fully completed. APM advised he would send on to new branch if employee was transferred
Mr Andrew Jeffrey Southern	Lancaster Crown Office	002418	17/08/2009	Yes	Training record on hand and retained at branch
Mr Youssef Saadah	Warrington Crown Office	008434	06/07/2009	Yes	Training file on hand
Mr Robert Thomas Hefferman	Warrington Crown Office	008434	06/07/2009	Yes	Training file on hand
Miss Layla Jane Sawford	Lerwick Crown Office	002849	27/07/2009	Yes	Started at Lerwick and training record on hand
Miss Sophie Louise Scott	High Street Sutton Crown Office	014013	17/08/2009	No	Not able to perform assessment and complete PSA following training as didn't attend the school to perform this

Ongoing product training is performed through a combination of communications and local training delivered by line managers and Subpostmasters. Any changes to products and associated processes are communicated to branches via a number of methods including specific training communications, memoviews (through the Horizon system), operational focus articles and work time learning and listening sessions (WTLLs). These are supported by changes to operational manuals or the issue of interim versions, which can be supplied in both hard copy and CD format. There is no validation that such training has been completed, other than through audit testing performed at branches. Moving forward, the update and maintenance of operational manuals will be managed through the new version of Horizon (to be rolled out in early 2010), although this still does not ensure that they will be read or referred to as required. A record of this training documentation is held on the Post Office Limited intranet site.

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There is a process for the development and authorising of regulatory training and it is delivered via a workbook in both hard copy and electronic versions. Everyone who takes the training is required to pass a test and this is done either on-line or via the Horizon system. The results of the training are monitored and records are maintained centrally however branches should also maintain local records of this training but it was not clear from this review whether this is being completed. Regulatory training is included in induction training and new entrants are required to take the test as part of the training - this is recorded on the PSA document.

Driving Compliant Sales Workbook Completed And Answered Correctly (Y or N)	
If No E-mail POL Compliance Team@POSTOFFICE With Trainee Details (Y or N)	

The Assurance Framework is a draft document that has been developed to compare Post Office Limited processes against a set of internationally recognised quality management standards - ISO9001. Whilst Post Office Limited is not an ISO accredited business, these standards are seen as a good basis for Post Office Limited to demonstrate that it is operating effectively in delivering products and services. When assessed against this framework, gaps were noted in training processes (specifically in the areas of the identification of training, maintenance of training records and the evaluation of effectiveness of training) against fundamental elements of the ISO9001 standard:

6.2.2 Competence, awareness and training

The organisation shall

- determine the necessary competence for personnel performing work related to the product
- provide appropriate training
- evaluate the effectiveness of any training provided
- ensure personnel are aware of the relevance and importance of their activities and how they contribute to the achievement of objectives
- maintain appropriate records of education, training, skills and experience

While the necessary skills, knowledge and competence are determined for crown staff and Subpostmasters, this is not the case for assistants working at agency branches. Appropriate training is provided and the relevance and importance of their work (and how this contributes to the objectives of the Business) is communicated. Gaps therefore exist for the identification of skills and training needs for agency staff and evaluation of the effectiveness of training and any subsequent support activity that is delivered. Whilst some records of training are maintained, there is inconsistency in the completion and deployment of these records and this does not extend to assistants working at agency branches.

6. Conclusion

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Vetting processes are well managed within the HR Centre and in line with the rest of the Royal Mail Group a "best endeavour" vetting policy is operated. Good supporting documentation is available but whilst well

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managed within the HR Centre, the P250 process is ultimately dependant on the form being completed and submitted by the Subpostmaster and this is not always happening. A small sample check performed during this review revealed a number of staff either not registered with HR or identified as registered but no longer working at the branch. There are also issues with the completion of the P250 when it is submitted as a 50% error rate was identified and there was no evidence noted of a process for following up on stage 2 checks that have failed to ensure that anyone who fails the stage 2 check is not still employed in the branch or elsewhere in the network. There is no escalation or transfer of management information relating to vetting process and documentation relating to vetting checks is potentially being held longer than necessary and therefore contrary to the Data Protection Principles.

The process for the registering of staff at nominee type branches, where a number of people are currently registered to work in more than one branch on a single P250, is currently being reviewed to formalise the approach.

Training records and supporting documentation is maintained but there is still some confusion regarding who holds and maintains these records. The audit performed on behalf of NS&I identified that training records should be accessible at all branches and whilst it has been identified that induction training records are left at agency branches which could be subsequently viewed as required this was not evidenced during this review. Training records and supporting documentation are actually accessible via the electronic filing cabinet (EFC) but there are varying standards of completion of this documentation and numerous versions of forms in evidence. Learning Action Plans do not always correlate to weaknesses identified in training and there is no documentary evidence to support follow up on the actions identified on the learning action plans and whether these have been completed, cleared or have led to an improvement in performance.

The training and records associated with the recently recruited Financial Services Specialists are good and the APMS showed good knowledge and awareness of training and supporting documentation. There is a lack of understanding and clarity regarding the retention of training records for other crown office staff and a sample check performed during this review identified a variety of approaches being applied by branch managers together with a lack of understanding of the purpose of a training record and the need for its retention and maintenance.

Regulatory training is delivered across the business and this is monitored centrally. Records of training are maintained centrally with branches expected to retain local records of this training (although results of audit activity indicate that this is not always the case).

Whilst some issues have been raised as part of this review in respect of vetting and training processes, vetting processes operated within Post Office Limited were generally comparable to the requirements of the ISO 9001 standards.

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7. Recommendations[Back to top](#)

Ref	Action Agreed with Action Owner	By Who	By When
1	P250 registration process to be re-communicated to branches, including the need to submit the P250 and to complete the form correctly	Sarah Rimmer	End of January 2010
2	A monitoring and escalation process to be introduced to follow up P250 security checks that fail at stage 2 to be explored to ensure staff that fail are not subsequently still employed at the branch or elsewhere in the network	Sarah Rimmer	End of March 2010
3	Escalation and provision of management information from security checks to be explored	Sarah Rimmer	End of March 2010
4	Formal process and documentation to be agreed and implemented for registering staff working at nominee type branches	Sarah Rimmer	End of March 2010
5	Documentation retention process to be implemented for security check records in the HR Centre and any documentation currently held beyond these retention periods to be destroyed through the confidential waste process	Sarah Rimmer	End of March 2010
6	Standardised training processes and latest versions of forms to be re-communicated to Field Support Advisors	Tony Hills	End of December 2009
7	Correct completion of Performance Standards Assessment & Learning Action Plan to be re-emphasised to Field Support Advisors	Tony Hills	End of December 2009
8	Periodic quality checks of training documentation completed by Field Support Advisors to be introduced	Tony Hills	End of January 2010
9	Current process for training records left at branches that are accessible on request to be extended to include the PSA	Tony Hills	End of March 2010
10	Learning Action Plan to be updated to identify closure of any actions and effectiveness of the actions taken	Tony Hills	End of March 2010
11	Retention and transfer processes to be documented on the training documentation transferred to Branch Managers	Tony Hills	End of January 2010
12	Communication to be sent to branches advising of need to retain records of regulatory training at the branch	Michael Dadra	End of December 2009

8. Appendix A – Vetting Checks Matrix
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Category	Job Roles
A:	The majority of frontline employees including Royal Mail Group casual employees
B:	Agency (except for specific sites or roles as specified below)
C:	Christmas Casuals (except for specific sites or roles as specified below)
D:	Screening operations including mail screening security admin.
E:	Security, all staff employed at Aviation Sites excluding those working in mail screening operations
F:	Sub-Postmasters
G:	People working within Branch Direct Units
H:	Post Office Limited
I:	Cash in Transit
J:	Managers, Senior Managers & Company Directors (including interim managers)
K:	Administrative and support staff including other functional & Head Office roles
L:	Mail Disguising Unit
M:	Royal Bank of Scotland
N:	Joint Venture Partners
O:	Contractors
P:	Any of the above roles where it has been advised exceptionally that national security vetting is a requirement either prior to, or in the course of, employment.

Vetting Activity	A	B	C	D	E	F	G	H	I	J	K	L	M	N	O	P	Notes
Do Not Recruit Categories – HR system	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	Identifies reasons for end of previous employment with RMG
Proof of Identity	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	Asylum and Immigration Act 1996 applies
Right to Work (in the UK)	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	Asylum and Immigration Act 1996 applies
Proof of Address	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	Fraud counter-measure
Personal Declaration	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	Validates application content
Criminal Convictions Declaration	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	Supports Debarment and Criminal Records Checks
Proof of Qualifications	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	Dependent upon job requirements
P13 (Statement of Confidentiality)	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	Official Secrets Act applies
Recruitment Risk Register Check (RRR)	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	Identifies people debarred from RM employment
5 Year Activity Record	X	X	X	X*	X*	X	X						X	X	X		Provides evidence of a candidates whereabouts * For D and E roles, DFT regulations, stipulate that an unacceptable gap is over 1 day (other categories are over 28 days)
10 year Activity Record						X	X										Provides evidence of a candidates whereabouts
Complete references to cover the 3 year period (min. of 2 references)				X	X							X					Minimum requirement for all roles, DFT rules cover D & E roles. For L roles, any stated periods of unemployment in the last 3 years must be confirmed with the benefits office.
Complete references to cover the 10 year period (min. of 2 references)						X	X										BS7858 and BS7872 cover these roles and contractual obligations for Branch Direct locations.
Request employer references in writing / telephone	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	Written references are requested in all instances where X applies. More information on Christmas Casual can also be found in Appendix 4.
References required prior to arrival on site				X	X	X*	X*				X	X					In all instances where applicable. Note where X* BS7858 apply
Criminal Records Check (CRC)	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	In all instances
Security Clearance (SC)				X	X											X	For some roles this check may be undertaken, in exceptional cases, as determined appropriate by Royal Mail National Security Vetting Team and the Recruitment Security and Vetting Team.
Counter Terrorist Check (CTC)				X												X	Subject to the nature of the role, DFT rules apply – Pre employment check
SIA Licence						X	X										Mandatory from March 2006 for cash crews and cash in transit employees.
Voters Register and Financial Check						X						X	X				Additional I.D. and financial checks for PDL. Credit reference search and defaults (including debt Arrangement scheme) for Mail disguising unit
Driving Licence	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	Dependent upon job requirements (e.g. Category C1)
Workers Registration Certificate	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	EU Accession Act applies
Employment restrictions 16-18 yr olds	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	Working time regulations apply
Health Declaration Forms	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	Info acted upon dependant upon role and medical history
Face to face interviews	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	Nature of the interview will vary according to role.
Periods of foreign travel >12 months requires written confirmation from independent 3 rd party												X					In all instances
Confirmation of discharge documents												X					For applicants previously in military service
Complete references to cover a three month period. (Min. of two references)													X				Written References to cover previous 3 months
Terrorism check												X					Via Bank of England's database of financial sanctions and terrorists

9. ASSURANCE REVIEW - RECRUITMENT (VETTING & TRAINING)

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TERMS OF REFERENCE**Background**

An audit performed by our external auditors (Ernst & Young), on behalf of National Savings & Investments (NS&I), in 2008, highlighted difficulties in being able to demonstrate that staff (employees and agents) had received induction training (or ongoing product training). As a result of this finding, the following action has been afforded to Post Office to deliver by September 2009.

"Post Office Limited should ensure all branches maintain full induction and regulatory training records for all staff and that these records are accurate, up to date and complete. Incomplete training records should be followed up and reminders sent. This will reduce the risk of improperly trained staff transacting NS&I products and services"

The audit by Ernst & Young also highlighted that staff with access to Horizon did not appear on training records and that Horizon user lists were not always up to date. Although not concluded from that audit, this highlighted a risk that staff working in branches may not be registered and adequately vetted.

Overall Objective

Review the processes to instigate and record vetting, induction training and ongoing product training of all branch staff (employees and agents).

Key Potential Risk Exposures

Key risks to Post Office Limited include:-

- Failure to meet Mails Integrity requirements
- Inability to assure existing or new clients (including NS&I) of robust controls over staff recruitment and training processes

Boundaries and Scope of the Assurance Review

The review will cover:-

- Exploring other reviews and initiatives covering this area (e.g. work carried out by Tony Hills, in response to audit by Ernst and Young (for NS&I) and assuring deployment of any actions arising from these reviews.
- Confirmation of recruitment processes (vetting and training) to the Assurance Framework
- Reviewing a map of the end to end process for the life cycle of new recruit
- Gap analysis and recommendation of remedial actions, highlighting any implications (e.g. cost) of implantation.

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A draft report will be issued to Lynn Hobbs (General Manager Network), Keith Woollard (Head of Compliance) and Ali Piper (Head of HR Services) by end of September, before issuing a final report.