

Separation Project - Criminal Investigations Policy for Post Office® Ltd

Project Objective

To develop & record a process map for the role of criminal investigations policy within POL post separation.

- Process maps that have now been prepared are as follows:
 1. Investigation related courses
 2. Research, interpretation, preparation, development and publication of investigation procedures
 3. Evaluation of criminal misconduct complaints and subsequent internal investigations
 4. Forensic examination of computers for investigation/prosecution
 5. Safe Systems of Work (SSoW) and near miss evaluation
 6. Tape recording, playback and copying machines
 7. Copying of CCTV tapes for investigation/prosecution

- The 2 areas below have been amalgamated onto a summary bullet point sheet;
 1. Almanac - Annual entry in Police & Constabulary Almanac will need amending
 2. Proceeds of Crime Act - Need to ensure that both RMG and POL are scheduled under POCA.

- The following area is under review within Section 5 of the Mails Distribution Agreement ('Investigations relating to POL Personnel') ;
 1. Operational Primacy - An MOU will need to be developed on operational primacy in given situations, e.g. POL counter staff stealing RM special deliveries.

Those process maps prepared include a description of the task, the benefits to the business, (i.e. financial, legal, compliance. H&S or otherwise). The process maps also include inputs (i.e. where does the info come from, who do we need to liaise with, what forums do we attend, what organisations must we join) and outputs, (what do we do with the info, who do we send it to, how do they use it etc).

Project Phases

- Program plan prepared.
- Focus Group formed (Graham Ward (Lead), Paul Southin, Dave Posnett, Helen Dickinson, Paul Whitaker)
- Initial meeting with RMUK Investigation Team to identify RMUK, contacts, Policies and Baton Passing requirements post separation.
- Format for Process maps agreed with POL stakeholders

The following pages detail the outputs.

Index

Page 3 - Investigation Related Training Courses

Page 4-6 inclusive - Investigation Procedures (Appendix 3A - Royal Mail Group Investigation Policy)

- P3A - Reporting of Crime / Case Raised - (Appendix 3A(1) - POL Triggers & Timescales)
- P3B - Progression & Reporting of Investigations / Prosecutions - (Appendix 3B(1) - CHIS) - Appendix 3B(2) Glossary of POL forms.

Page 7 - Criminal Misconduct & Internal Complaints - (Appendix 4 RMUK Policy)

Page 8 - Forensic Examination of Computers (Appendix 5(1) - RMUK Policy / Appendix 5(2) - Hardware & Software requirements for a Computer Team)

Page 9 - Safe Systems of Work & Near Miss Evaluation (Appendix 6 - RMUK SSoW Policy)

Page 10 - Tape recording, playback, CCTV and copying machines

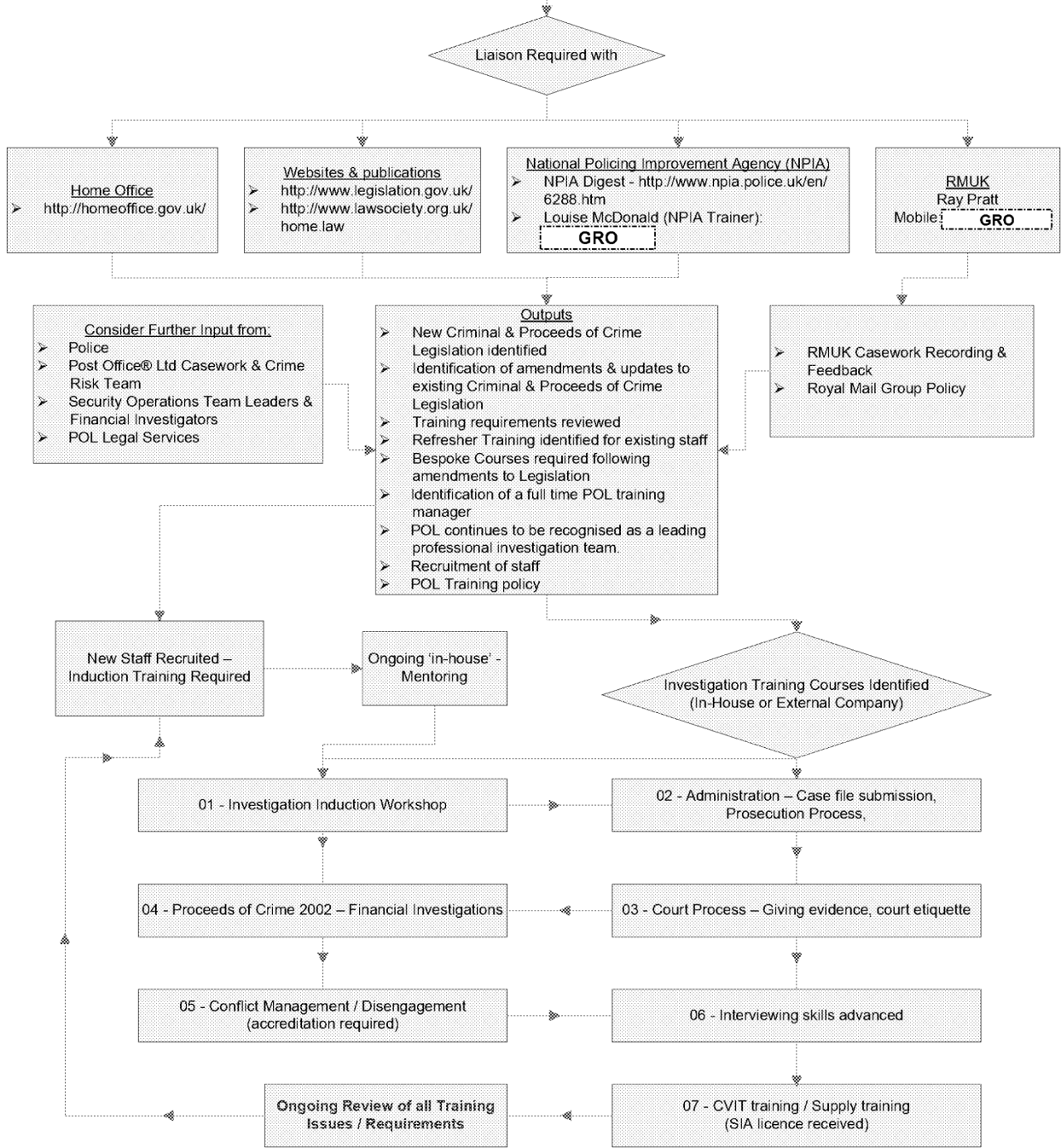
Page 11 - Police Almanac & POL scheduled under POCA 2002

Important Areas to be addressed prior to Separation

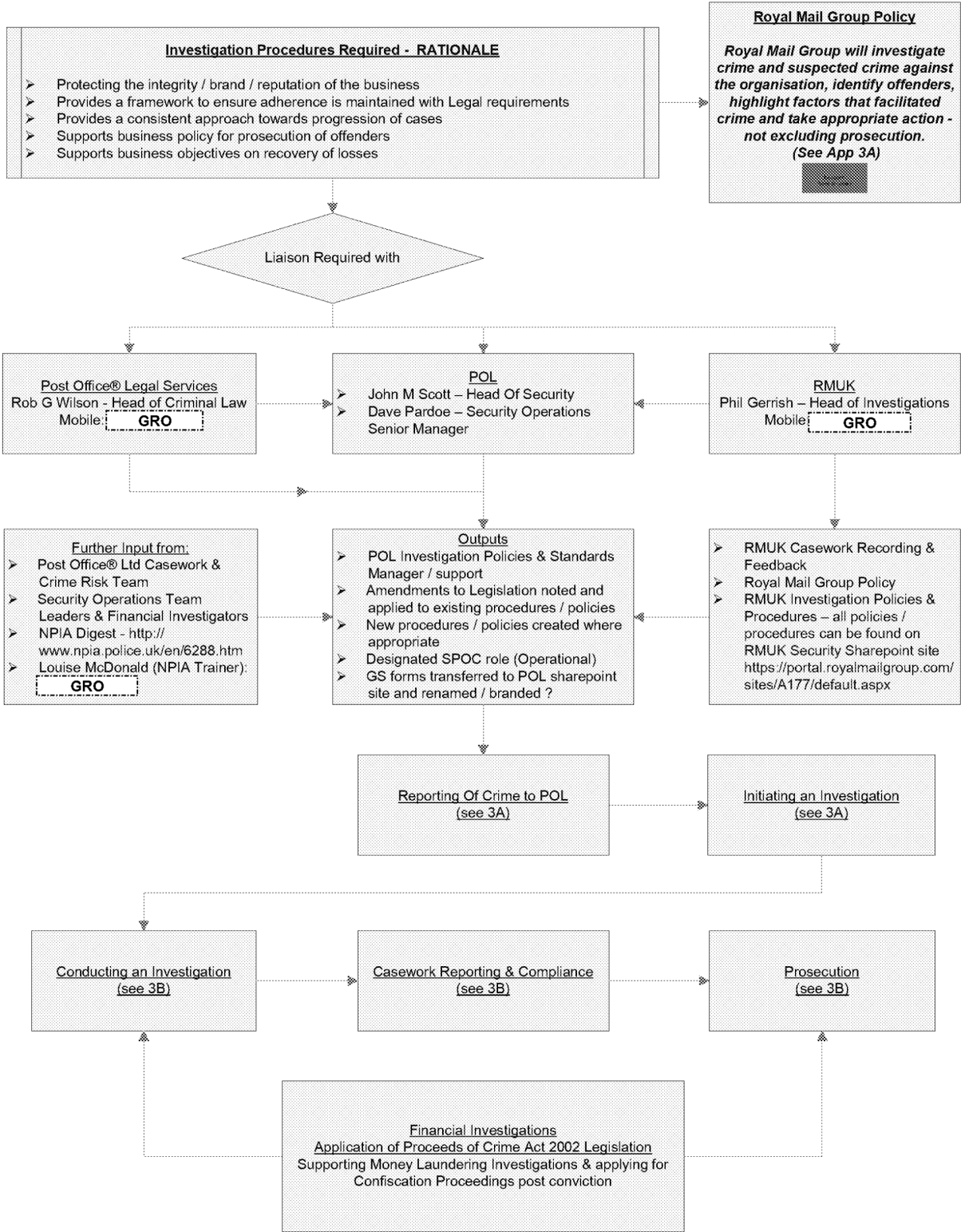
1. Requirement for a POL computer forensic team (or access to existing RMUK team?)
2. Migration of existing Investigation / Prosecution forms from RM Sharepoint to POL Sharepoint (and to include editing RM entries to POL)
3. POL to have a 24 hour standby officer (or continue with inclusion on the existing POL Incident Management Process)
4. POL to have access to the PNC. Secure link required.

POL Separation Project – P2 – Investigation Related Training Courses

- Investigation Training Courses Required - RATIONALE**
- Supports business policy for Prosecution of Offenders / Recovery of Losses.
 - Legal requirement to have PACE trained Investigators as POL is a non-police prosecuting authority.
 - Provides Framework for maintaining & developing consistent Professional Standards of Investigation Personnel.
 - Providing ongoing training for the professional development of individuals.
 - Supports business requirement in complying with industry standards & H&S legislation.
 - Provides continuity for succession planning.



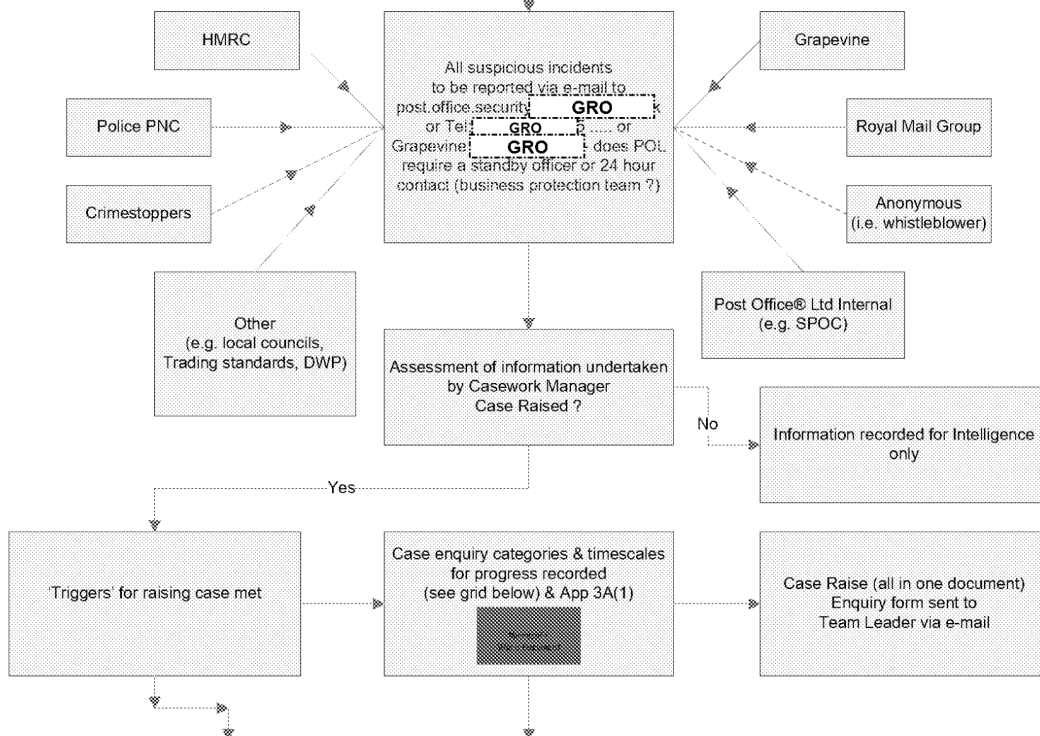
POL Separation Project – P3 – Research, interpretation, preparation, development and publication of investigation procedures



POL Separation Project – P3A – Research, interpretation, preparation, development and publication of investigation procedures

P3A - Reporting Of Crime/Case Raise – RATIONALE

- Protecting the integrity / brand / reputation of the business
- Provides a consistent approach towards progression of cases
- Supports business policy for prosecution of offenders
- Supports business objectives on recovery of losses
- Provides an Intelligence Database of historical information

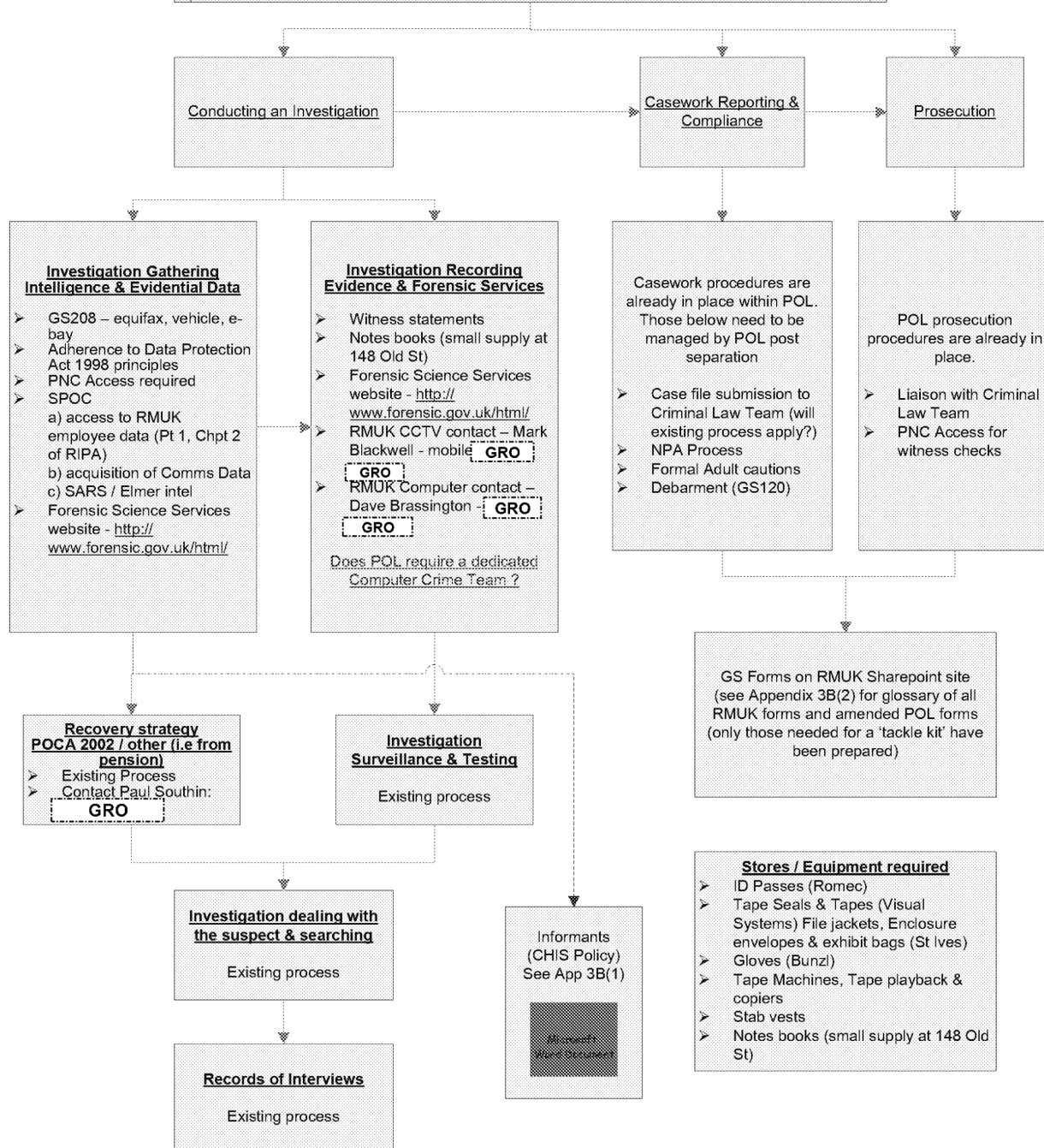


Category	Definition	Submission / Closure
Immediate Open Enquiry	Where immediate response is appropriate and few pre-interview enquiries are needed or practicable	Interview on day of notification (where possible) minimum within 48 hours and case submitted to normal report timescales (12 days)
Major Enquiry	>£15,000 (or major customer / client / reputation impact) where immediate response is not possible due to the requirement to perform pre-interview enquiries / analysis	Case to be at "suspect offender" interviewed within 1 month of raise
Open Enquiry	Where interviews within 2 month are appropriate and few pre-interview enquiries are needed	Able to progress almost immediately Case to be at "suspect offender" interviewed stage within 2 months of raise
Standard Enquiry	All other enquiries not included in the above - where immediate response is not possible due to the requirement to perform pre-interview enquiries	Case to be at "suspect offender" interviewed and submitted / closure stage within 2 months of raise Should enquiries indicate increased loss or impact, status must be amended to Major Enquiry immediately
Liaison	Any case where liaison with another investigative body leading enquiries into criminal activity at POL branches	Case to be updated monthly via the monthly spreadsheet process

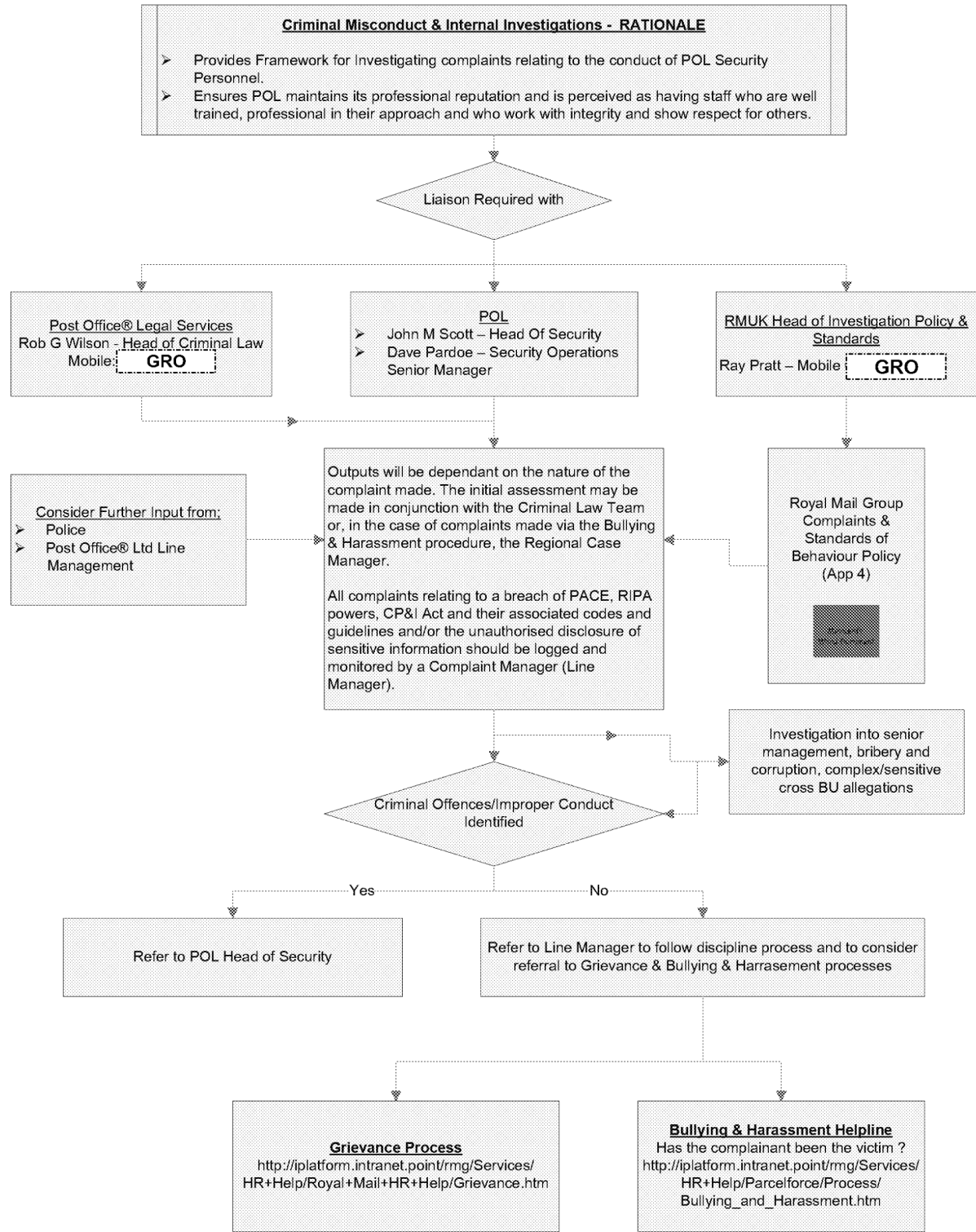
POL Separation Project – P3B – Research, interpretation, preparation, development and publication of investigation procedures

3B – Progression & Reporting of investigation & Prosecution cases – RATIONALE

- Protecting the integrity / brand / reputation of the business
- Provides a framework to ensure adherence with legal requirements is achieved & maintained
- Provides a consistent approach towards progression of cases
- Supports business policy for prosecution of offenders
- Supports business objectives on recovery of losses

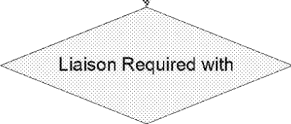


POL Separation Project – P4 – Evaluation of criminal misconduct complaints and subsequent internal investigations



POL Separation Project – P5 – Forensic examination of computers for investigation/prosecution

- Forensic examination of computers for investigation/prosecution - RATIONALE**
- Supports business policy for Prosecution of offenders
 - Identify evidence to prosecute crime
 - Substantiate evidence to prosecute crime
 - Support additional charges
 - Assist recovery process (e.g bank account info, gambling/spread betting signs)
 - Includes other digital media – mobile phones, cameras, pen drives, hard drives, sat nav's, cd's
 - Intelligence gathering



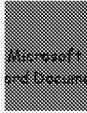
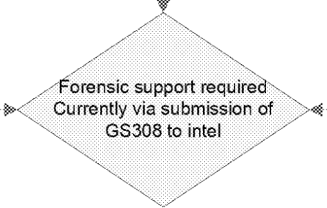
- External agencies**
- Software provided externally (inc training) – Financial Toolkit (FTK) re forensics
 - External software company (inc training) – Aceso re mobile telephones
 - External company – Internet Watch Foundation re paedophilia (usually handed over to police)
 - External companies that offer similar service (but probably far more expensive); FSS (at the moment), Disklabs Computer Forensics, Computer Forensic Service, Kroll Ontrack, QinteQ.

- Internal Agencies**
- Internal software company (but other companies out there) – Pointsec re decryption keys, monitoring web use,
 - Internal software company (but other companies out there) – CSC re details of TP calls, email activity, internet history

National Crime Agency
(currently NPIA, SOCA, etc)
in relation to bigger/wider crime


RMUK
Dave Brassington
Computer Forensic Team Leader
Mobile: **GRO**

RMUK Group Policy
Appendix P5(1)

- Outputs**
- Witness statements
 - Evidence/exhibit production
 - Court appearances (live evidence)
 - Liaison point for computer issues
 - Procedure/standards for handling digital evidence
 - ACPO guidelines re best practice
 - Liaison, comms, presentations re electronic evidence
 - Computer Misuse Act
 - Research (new cases, etc)

Hardware & Software requirements for a computer forensic Team
Appendix P5(2)



POL Separation Project – P6 – Safe Systems of Work (SSoW) & near miss evaluation

Safe Systems of Work (SSoW) and near miss evaluation – RATIONALE

- It is a Legal requirement under the H&S at Work Act 1974
- Supports business Investigation procedures policy (SSoW)
- Identifies risks to Security staff (i.e. when approaching suspects, searching premises, interviews, serving summons/caution, attending court)
- Identifies risks to suspects / other POL staff involved in enquiries
- Identifies protective equipment required
- Identifies training requirements
- Identifies re-fresher training requirements

Liaison Required with

UK Health & Safety Executive
 ➤ <http://www.hse.gov.uk/legislation/hswa.htm>

RMUK Head of Safety (CSR)
 Keith X Scott
 Mobile: [GRO]

RMUK Security H&S
 Alison Angus
 Mobile: [GRO]

Reporting of Incidents
 Does POL use ERICA?

Outputs

- POL 'SSoW' & 'Near Miss' Policy
- Refresher SSoW Training identified for existing staff
- Bespoke training courses required following amendments to H&S legislation
- Identification of amendments & updates required for POL SSoW policy
- Identification of changes in the H&S at Work Act 1974

➤ Royal Mail Group Policy
 ➤ RMUK Security SSoW Policy - (imbedded below) – see - P6 App A

Microsoft Word Security

SSoW & H&S Training Courses Identified (In-House or External Company)

Risks to Security Staff include

- Out of Office enquiries
- Surveillance
- Court attendance
- Approaches to suspects
- Offender interviews
- Searching persons, premises, vehicles
- Serving summons, cautions, restraint orders

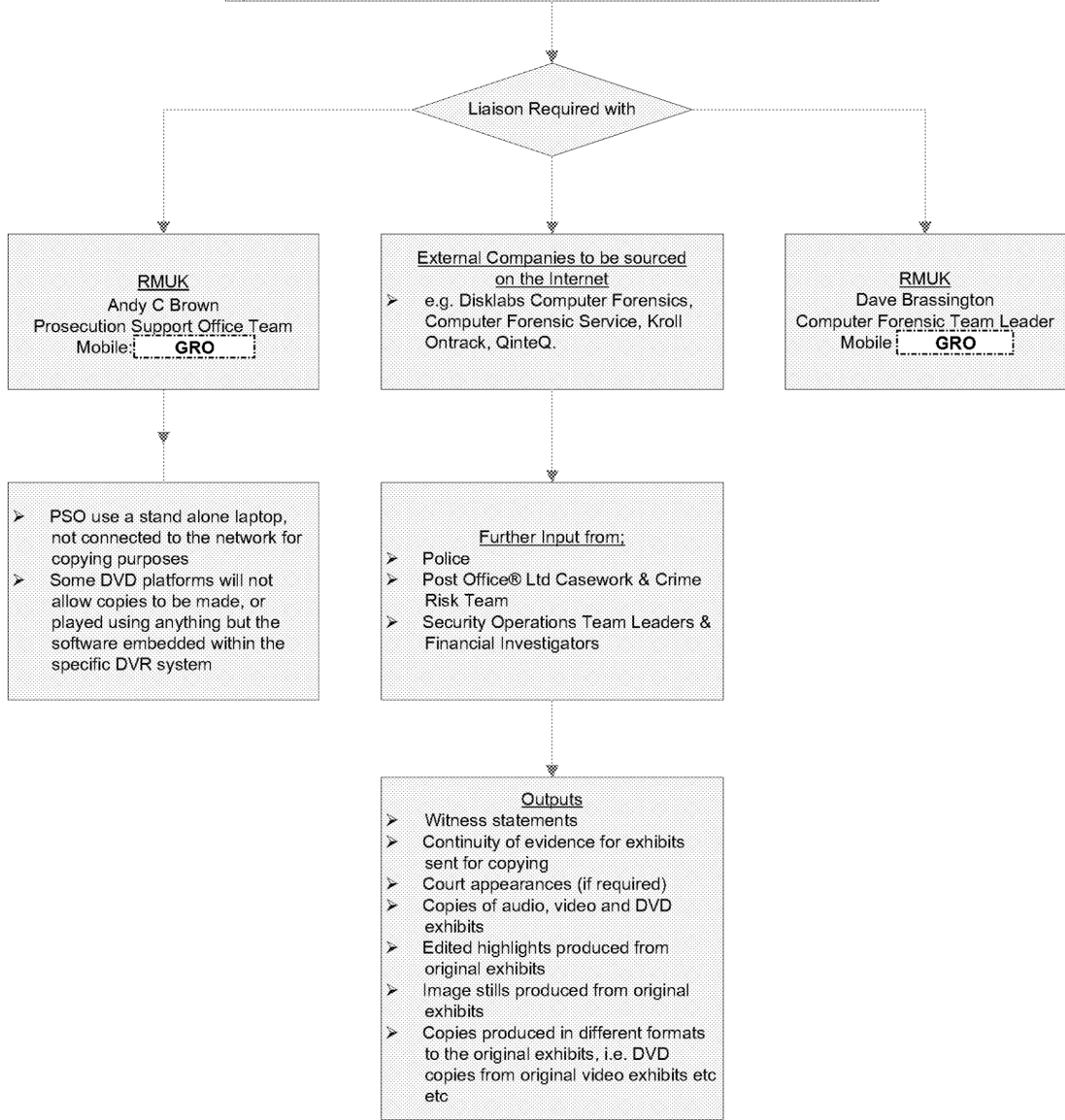
General H&S awareness training

Conflict Management / Disengagement (accreditation required)

Completion of Post Office® Risk Assessments (PORA workshop - rationale)

POL Separation Project – P7 & P8
Tape recording, playback, CCTV and copying machines

- Tape recording, playback and copying machines - RATIONALE**
- Supports business policy for Prosecution of offenders
 - Professional copying service for field investigators throughout Royal Mail Security
 - Assist Investigators in producing evidence for court
 - Service includes audio tape, video tape and DVD recording formats
 - Identify evidence to prosecute crime
 - Substantiate evidence to prosecute crime
 - Support additional charges
 - Assist recovery process (e.g bank account info, gambling/spread betting signs)
 - Includes other digital media – mobile phones, cameras, pen drives, hard drives, sat nav's, cd's
 - Intelligence gathering



P9 - Separation Project

A - Police Almanac & POL Listing as Non-Police Prosecuting Agency

Rationale

- Provides a listed point of contact for all security agencies to contact correct POL personnel
- Raises awareness of the POL Security Team throughout the industry
- Builds and develops relationships with external agencies

Liaison required with

- Thomson Reuters (Producers of the Almanac) - Paul Southin already dealing via Chris Webb at Reuters

Outputs

- External enquiries directed to correct personnel
- Improved use of team resources
- More effective communication

Other potentially useful info

- The Police Almanac is supplied to all Police forces and other security agencies within the UK and is updated to reflect changes in each new issue

B - Post Office Ltd scheduled independently under POCA

Rationale

- To enable Post Office Ltd to conduct full financial investigations and recoveries through the powers provided by the Proceeds of Crime Act 2002 legislation
- POL can continue with it's robust approach to the recovery of business losses as a result of crime

Liaison required with

- Home Office (see e-mail below from Steve Guilbert dated 1st Aug ***)
(Steve Guilbert - Postal Policy - Department for Business, Innovation and Skills, Tel: [GRO] and (William.Gibson [GRO] Will Gibson, Shareholder Executive
Tel: [GRO])

*** As far as POCA is concerned, we did clear the separation with Home Office and the modification Order to account for the split and the naming of Royal Mail Group Limited and Post Office Limited will be made to allow for the continued operations of POL.

Outputs

- Enable effective recovery of monies stolen from the business
- Expand the brief of the Financial Investigation Unit to conduct full intelligence enquiries

- Listed separately from RMUK under JARD (Paul Southin dealing with Geoff Hussey NPJA)

Other potentially useful info

- The separation from Royal Mail Group in relation to POCA has been agreed by the Home Office and a new statutory instrument listed POL as a separate entity will be issued in the autumn.