

Royal Mail Group Crime and Investigation Policy**1. Purpose**

- 1.1. Royal Mail Group handles millions of items of mail entrusted to us by our customers every day. We handle large volumes of cash and valuable items. We conduct huge numbers of financial transactions and we gain and maintain information in the course of our business that is personal and confidential. It follows that we must deserve and maintain the absolute trust of our customers, staff, suppliers and others with whom we come in contact.
- 1.2. Royal Mail Group requires all of its employees to act honestly and with integrity at all times, and to safeguard the mail and business and customer assets for which they are responsible.
- 1.3. The risk of crime against Royal Mail Group and its businesses is managed through a range of policy and procedure-based controls, designed to prevent, deter or disrupt potential targeted or opportunistic criminal activity. These controls are embedded at appropriate levels and are defined to optimise the level of risk Royal Mail Group faces. However these controls cannot and are not designed to be absolute and Royal Mail Group will always expect a level of crime actually to occur.
- 1.4. This Crime and Investigation policy has been developed to detail the principal criminal risks to Royal Mail Group and to define the response that Royal Mail Group commits to taking in the event of suspected or detected crime. It will also support and promote our code of business standards and facilitate the effective design and review of mail integrity controls, business systems and internal financial controls that prevent, deter, identify and minimise or eradicate Crime.

2. Link to Accountabilities

- 2.1. Accountability number: 600 Policy and frameworks for security within Royal Mail.

3. Scope of Policy

- 3.1. This policy applies to any crime, or suspected crime, involving or impacting on Royal Mail Group.

4. Crime Types

- 4.1. The predominant non-violent crime types faced and directly investigated by Royal Mail Group are
 - 4.1.1. Theft (of)
 - Mail, whether code postal packets or non-regulated products
 - Cash
 - Operational assets, e.g. vehicles and other equipment
 - Information
 - Other assets, e.g. contractors' or private property
 - 4.1.2. Fraud (against)
 - Payroll, overtime or allowances
 - Financial systems
 - Treasury systems
 - Procurement and purchasing systems
 - Brand or Reputation
 - 4.1.3. Postal Services Act offences (interfering with postal packets)
 - Opening
 - Intentional Delay
 - 4.1.4. Corruption (dishonest benefit gained from)
 - Undeclared interests
 - Inappropriate business or personal relationships
- 4.2. Royal Mail security teams work with police and other agencies to deal with and investigate any Royal Mail related offences involving threats, violence or intimidation against its staff, customers or other persons, whether for the purpose of robbery or some other reason.
- 4.3. Royal Mail also faces and deals with offences against property, such as burglary or vandalism. Other less frequent offences include immigration or customs related crimes, misuse of computers, offences involving pornographic images and drug-related offences, all of which will normally be dealt with in partnership with specialist police or law enforcement resources.

5. Investigation Response

- 5.1. Royal Mail Group Security and its subordinate business unit security teams maintain professional criminal investigation teams, staffed by personnel trained to conduct investigations in accordance with the different judicial systems and legislative requirements of England and Wales, Scotland, and Northern Ireland.
- 5.2. All criminal investigations must be conducted in accordance with relevant national legislation, in compliance with Royal Mail's additional rules for the management of criminal investigations and to strict standards of evidential admissibility.

- 5.3. The aims of such criminal investigations are
 - 5.3.1. maintaining the safety and security of staff and customers
 - 5.3.2. identifying, apprehending and, if appropriate, prosecuting suspected offenders
 - 5.3.3. recovering Royal Mail cash and other assets and, if appropriate, cash or assets belonging to other victims of crime
 - 5.3.4. identifying system or other weaknesses, rectifying these and ensuring, wherever possible, that similar crimes do not reoccur
- 5.4. Royal Mail will investigate with absolute impartiality all suspected or detected crime against it, either using its own resources or where relevant in partnership with police and other agencies.
- 5.5. Where the level or volume of crime affecting a business unit exceeds its capacity to investigate, the business unit security team will maintain and apply principles for the prioritisation of criminal investigations. These principles will ensure that the investigation of individual offences or series of crimes is prioritised in direct relation to their impact upon Royal Mail or the business unit and, through Royal Mail, upon society generally. The principles must be applied consistently and without any influence from personal or commercial interests, within or external to Royal Mail.
- 5.6. Where the level or volume of crime affecting one Royal Mail business unit exceeds its capacity effectively to investigate, the Group Security Director may assess and prioritise the allocation of resource across the business units.
- 5.7. Where an investigation in England and Wales led by Royal Mail investigators is judged by the relevant casework management function to have gathered sufficient evidence to warrant obtaining legal advice, the case will be submitted to the Royal Mail Legal Services Criminal Law Team where it will be assessed in accordance with the Royal Mail Prosecution Policy and a decision made on whether to prosecute.
- 5.8. For investigations in Scotland and Northern Ireland and those led by other agencies prosecution decisions will be made as detailed in the Royal Mail Prosecution Policy.

6. Responsibilities

- 6.1. All Employees have a responsibility to
 - 6.1.1. Comply with Royal Mail Group's Code of Business Standards, Employee Disclosure Policy, Procurement Standards, Business Unit Code of Conduct, Guidelines on 'Conflicts of Interest', Information Security Policy, Insider Dealing Policy and the Data Protection Act.
 - 6.1.2. Comply with Condition 8 of the Mail Licence and apply the highest standards of integrity in dealing with customers' mail.
 - 6.1.3. Act with propriety in the use of customers' and suppliers' resources.
 - 6.1.4. Immediately report through one of the various communication channels any allegations or suspicions of crime.
 - 6.1.5. Co-operate fully with investigations, security audits or reviews.
- 6.2. The Group Security Director has a responsibility to
 - 6.2.1. Ensure that appropriate structures are in place to enable the prompt and thorough investigation of any allegations of criminal offences committed by employees, agents or members of the public.
 - 6.2.2. Establish an effective crime response plan, commensurate with the level of crime risk identified as facing Royal Mail at a given point
 - 6.2.3. Establish appropriate mechanisms to
 - 6.2.3.1. Report levels of crime risk
 - 6.2.3.2. Report significant incidents to the Board via the Company Secretary's Office
 - 6.2.3.3. Report remedial actions to prevent or deter further crime
 - 6.2.3.4. Engage with the Corporate Risk Management Committee (CRMC), the Audit & Risk Committee (ARC) and Mails Integrity Working Group on matters of Crime Risk and Mails Integrity.

7. Reporting - Criminal Suspected Crime

- 7.1. Royal Mail Group will at all times maintain a number of channels of communication through which employees, customers, consultants, contractors, vendors, franchisees, agents or their sub-contractors can report any suspicions of crime of any type. These different channels will ensure that any and all of the following criteria can be met
 - Professional - capable of accurately and effectively capturing necessary details of any allegation or report
 - Impartial - accepting all information fully and non-judgementally
 - Confidential - able to assure with confidence that details provided will be accorded appropriate levels of confidentiality
 - Anonymous - able to accept reports and assure the anonymity and protection of the individual reporting, if so desired
 - Responsive - capable of committing to a realistic response and timescale
- 7.2. Details of current channels available will be easily accessible to all staff, contractors and members of the public and can be obtained at any time from Royal Mail Group Security

8. Consequences (Penalties)

- 8.1. Where a business leader, manager or employee is the subject of a criminal investigation and grounds are established to suspect them of having committed a criminal offence, breached Royal Mail Group's code of business standards or subverted business systems, controls or policies, they may enter one or both of the following processes
 - the relevant national Criminal Justice System
 - the relevant business unit Code of Conduct.
- 8.2. Non-employees suspected of having committed a criminal offence may also enter the relevant national Criminal Justice System, and all those involved in a commercial relationship with Royal Mail Group may expect to see the relationship terminated.
- 8.3. Once committed to the relevant Criminal Justice System it is the accountability of Royal Mail, its investigators, criminal lawyers and prosecuting agents to ensure that the case is presented impartially but with all possible evidential support and preparation. It is the function solely of the relevant court to decide upon guilt and the appropriate penalty.
- 8.4. Once embarked within the business unit conduct process, it is the accountability of the relevant line or conduct manager to review the evidence gathered during the criminal investigation and arrive at an impartial decision regarding guilt in the business context and consequent penalty. However, Royal Mail Group notes the following in its Conduct Code Agreement (emboldening maintained from the original version):

As a result of a recent matter within Royal Mail Group Limited, **it is considered necessary to reinforce the message that theft and all other acts of dishonesty are viewed by the business as acts of gross misconduct** (as clearly set out in both the Conduct Code and the Code of Business Standards) and if proved, are likely to result in dismissal without notice (summary dismissal). Where there is an allegation of theft against an employee, it is often the case that the criminal investigation/criminal prosecution team within the business are also progressing an investigation into the matter. In those circumstances the manager handling the Conduct Code investigation must liaise with those handling any criminal investigation/prosecution before making a decision on the conduct code case.

9. Links to other reference material

- >> [Royal Mail Group Code of Business Standards](#)
- >> [Policy G7 Employee Disclosure \(Whistle blowing\)](#)
- >> [Policy S3 Royal Mail Prosecution Policy](#)

5. Document Details

1. **Owner:** Company Secretary
2. **Enquiry point:** Tony Marsh, Group Security Director
3. **Effective from:** Current
4. **Version:** 1.1
5. **Review date:** October 2010
6. **Last reviewed:** October 2009