

## ROYAL MAIL GROUP SECURITY - PROCEDURES &amp; STANDARDS

STANDARDS OF BEHAVIOUR AND COMPLAINTS PROCEDURE		P&S Doc. 10-X
<b>1. PURPOSE.</b>		
The aim of this document is to provide Royal Mail Group Security personnel with clear guidance concerning the required Procedures & Standards in relation to the above subject and ensure that they know and understand the behaviour expected of them and the relevant business processes for the investigation of reports of alleged unprofessional and/or unlawful behaviour.		
<b>2. INTRODUCTION</b>		
2.1	Royal Mail Group Security (RMGS) personnel conduct inquiries into criminal and suspected criminal activity. It is vital to the success of these inquiries and to the status of Royal Mail as a public authority (with the additional powers this provides) that employees, members of the public, the Police, Home Office and the Criminal Justice system have absolute confidence in the integrity, conduct and professional status of RMGS personnel in performing their role.	
2.2	It follows that allegations of improper behaviour by RMGS personnel during a criminal investigation are viewed in a more serious light than if the individual occupied a less responsible position.	
2.3	This means adherence to the law, code of business standards, Business Policy and Standards and Group Security Policy, Procedures and Standards at all times. RMGS personnel are advised that although not formally referred to in the aforementioned business means of communication, inappropriate conduct or behaviour outside of work (including work related functions), likely to bring Royal Mail Group into disrepute or give cause to question an individual's suitability to perform a role within RMGS may be subject to actions referred to in these P&S.	
	Due to the nature of the job Investigators in particular will be at greater risk of complaints being made about their conduct/behaviour whether they be genuinely made, vexatious or designed to undermine an investigation/prosecution. Irrespective of the source/motive RMGS has a responsibility to assess and investigate all complaints with impartiality and where appropriate take action.	
<b>3. RULES AND STANDARDS</b>		
3.1	Rules and standards governing Royal Mail Group Security personnel are grouped into three broad areas. Links are provided to the relevant Policies and Standards.	
3.2	<b>LAW</b>	

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3.3	Criminal acts committed by RMGS personnel in the course of their duties will be investigated as per section 6, Criminal Investigation. Proceedings concerning criminal acts outside work must be reported to line managers and investigated in accordance with the Royal Mail Conduct Code and assessed as per Agreement s.12 where the manager must consider "whether the offence is one that makes the individual unsuitable for his or her type of work".
3.4	<p><b>RMG POLICY &amp; CODES OF PRACTICE</b></p> <p><b>Code of Business Standards</b></p> <p><b>B&amp;H Investigators Guide.pdf</b></p> <p><b>Data Protection Act Policy</b></p> <p><b>Information Security Policy</b></p>
	<p><b>GROUP SECURITY POLICY, PROCEDURES &amp; STANDARDS</b></p> <p><b>RMG Criminal Investigation and Prosecution Policy</b></p> <p>The Group Security Procedures &amp; Standards can be located on the Group Security Database.</p>
<b>4. REPORTING/COMPLAINT ASSESSMENT</b>	
4.1	Complaints will normally be referred to either the Head of Investigations (Royal Mail, PFWW or POL) or to the Complaint Manager (RMLS Policy, Standards & Investigation Support Manager) or his nominated deputy for initial assessment and selection of the business procedure to be applied, namely Criminal Investigation, Grievance Procedure, Conduct Code or the Bullying and Harassment procedure (see 'Procedures' below).
4.2	
4.3	Dependant on the nature of the complaint the initial assessment may be made in conjunction with the Criminal Law Team or, in the case of complaints made via the Bullying & Harassment procedure, the Regional Case Manager.
4.4	All complaints relating to a breach of PACE, RIPA powers, CP&I Act and their associated codes and guidelines and/or the unauthorised disclosure of sensitive information will be logged and monitored by the Complaint Manager.
4.5	In the event of a multiple issue complaint the initial assessment will include a decision as to whether the matters are dealt with under one process or whether there is a need to utilise more than one. An example being if general conduct matters are raised alongside an allegation of criminal behaviour. The latter would be investigated as per section 6 with the other matters being dealt with under another business process.
4.6	Where more than one process is utilised and one of them is a criminal investigation the sequencing of any investigative activity will be agreed between the complaint manager and the

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	<p>people leading on the business process. The complaint manager will also be advised of any investigation outcome prior to the complainant being notified of the result/decision. This is to ensure that due consideration is given to the impact of any communication on the ongoing element of the complaint investigation.</p> <p>All complaints referred to the Complaints Manager will be recorded and a log maintained detailing the business procedure applied and any conclusions reached.</p>
<b>5. PROCEDURES</b>	
<b>5.1</b>	All complaints (irrespective of whether raised by an employee, member of the public, external agency or the Investigatory Powers Tribunal) about the conduct or behaviour of a Royal Mail Group Security employee will be investigated utilising existing business processes. The subject of the complaint will have the same rights under each process as any other employee of Royal Mail Group Ltd
<b>5.2</b>	To demonstrate independence and impartiality the investigation may be undertaken by an investigator from a different business unit than the subject of the complaint or in some circumstances by an investigator within a different territory. The complaint manager
<b>5.3</b>	will make this decision in consultation with the relevant Head/s of Investigations.
<b>5.4</b>	<p>All complaint investigations will be carried out in a timely fashion and/or within business process timescales and will not normally be delayed due to an ongoing criminal investigation or prosecution.</p> <p>Where the complaint relates to an ongoing criminal investigation or prosecution the Criminal Law Team will be notified and kept informed of progress by the nominated person investigating the said complaint. Any decision to delay a complaint investigation will be made by the complaints manager in consultation with the CLT and the person leading the investigation.</p>
<b>6. CRIMINAL INVESTIGATION</b>	
<b>6.1</b>	The Lead Investigator will be selected from a different business unit within Royal Mail Group Security or, where resource is scarce, from a team reporting to a different SB8 within Royal Mail Group Security than the subject of the investigation.
<b>6.2</b>	The conduct of a criminal investigation will be determined by the Lead Investigator in the case in consultation with the Complaint Manager, Criminal Law Team (including 3rd party review if deemed necessary) and the Police if applicable.
<b>6.3</b>	

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6.4	<p>The suspect will have the same rights as any other employee of Royal Mail Group Ltd.</p> <p>The outputs of the investigation may represent the fact-finding stage of the conduct code and will be referred to the 1<sup>st</sup> or 2<sup>nd</sup> line manager. Where prosecution is a consideration the Criminal Law Team will advise.</p>
<b>7. GRIEVANCE PROCEDURE</b>	
7.1	<p>The following link takes you to the process to be followed for complaints raised under the Grievance procedure. <b>Grievance Procedure Guidelines</b></p>
7.2	<p>If it is considered necessary, or the complainant requests it and provides a substantial reason, the investigation may be conducted away from the line. The outputs of the investigation may represent the fact-finding stage of the conduct code and will be referred to the 1<sup>st</sup> or 2<sup>nd</sup> line manager.</p>
<b>8. THE BULLYING AND HARASSMENT PROCEDURE</b>	
8.1	<p>Complaints made via the Bullying and Harassment procedure about the conduct of an employee of Royal Mail Group Security during the course of their duties connected with criminal investigations will be managed by the Royal Mail B&amp;H team or will be referred to the Complaints Manager to instigate an investigation.</p>
8.2	<p>Where the Bullying &amp; Harassment team manage the investigation guidance will be provided to them by the Criminal Law Team and/or a Senior RMGS Manager to ensure an understanding of the nature and complexity of the role performed by an employee of Royal Mail Group Security.</p>
8.3	
8.4	<p>Complaints made via the Bullying and Harassment procedure and referred to the Complaints Manager will be investigated in accordance with the B&amp;H procedure.</p> <p>The investigation findings will be presented to the 1<sup>st</sup> or 2<sup>nd</sup> line manager of the subject of the complaint.</p> <p><b>B&amp;H Investigators Guide.pdf</b></p>
<b>9. CONDUCT CODE</b>	
9.1	<p>Unless, following initial assessment, an independent, impartial investigation is considered necessary, any matters relating to the conduct of an employee of Royal Mail Group Security will be referred to the subject's 1<sup>st</sup> or 2<sup>nd</sup> line manager to investigate.</p>
9.2	<p>If it is considered necessary for the investigation to be</p>

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	<p>conducted away from the line then the outputs may represent the fact-finding stage of the conduct code and will be referred to the 1<sup>st</sup> or 2<sup>nd</sup> line manager.</p> <p><b>Conduct Code Process Link</b></p>
<b>10. CASE RESOLUTION</b>	
<b>10.1</b>	The responsibility for responding to the complainant, line manager or representative of the complainant about the outcome of an investigation under any of the aforementioned processes will normally rest with the person leading the investigation. When responding care will be taken to ensure that the wording of the letter is fair, in that it conveys to the complainant the thorough nature of the investigation but also recognises the dignity and rights of the subject of the complaint.
<b>10.2</b>	
<b>10.3</b>	<p>If the complaint is made by a member of the public or an external agency such as the Police or Investigatory Powers Tribunal, the response will be provided by either the Head of Investigations (Royal Mail, PFWW or POL) or by the Complaints Manager or his nominated deputy.</p> <p>The Complaint Manager will be responsible for addressing any consequent matters that arise out of an investigation that have an impact on policy, procedures &amp; standards or training.</p>
<b>11. APPEALS</b>	
<b>11.1</b>	Any appeals against either an investigation and/or a decision will be managed in accordance with Royal Mail Group Ltd procedures.
<b>12. REVIEWS</b>	
<b>12.1</b>	The Complaint Manager will carry out a monthly review of the complaint log to ensure that case timescales are being met and any relevant updates are recorded.
<b>12.2</b>	An annual review of these Procedures and Standards will be undertaken on behalf of the Group Security Council by the Criminal Investigation & Prosecution Policy Group