APPENDIX 1 – POL CRIMINAL INVESTIGATIONS AND ENFORCEMENT PROCEDURE

Report of Concern:
- Irregularities Identified by Audit Team
- Complaint from Customer
- Complaint from Member of Public
- Report from POL Management

Referral to **Investigations & Security Team** to consider potential criminal wrongdoing. File set up and allocated to **POL Security Manager**

Discussion

Referral to **Contracts Manager** or **Line Manager** for further consideration/possible action including disciplinary and contractual remedies.

Any concerns of threatened violence/ belligerence by suspect/others identified?

YES? Involve Police

NO? Investigations & Security Team carry out further investigations

Investigations result in a suspicion that a criminal offence has been committed?

NO? Recommendation of No Further Action to **Team Leader** to approve

Approval Obtained. No Further Action. Close File

YES? Invitation to suspect to attend Interview under Caution (under Police & Criminal Evidence Act 1984) with **Investigations & Security team** and interview takes place/is declined

Investigations and Security Team prepare report outlining evidence (Evidence Package) and Recommendations

Report recommends criminal enforcement action?

NO? Recommendation of No Further Action to **Team Leader** to approve

YES?
1. Report sent to **POL Criminal Lawyer** for legal input on recommendations/any further evidence or investigations required (considering EPP).

YES?
2. Consider whether **Restraint Order** is required to recover assets, considering:
- Voluntary repayment?
- Credible repayment offer made?
- Assets unavailable?
- Other factors against confiscation as per EPP?

NO? Recommendation of Restraint Order to **Financial Investigator** to approve

YES? Recommendation of No Further Action to **Financial Investigator** to approve

Does the **POL Criminal Lawyer** require further investigations/evidence?

YES? Further investigations undertaken by **Investigations & Security Team.**

NO? Referral to **External Lawyers** for Written Advice on Prosecution and Proposed Charges (applying EPP)

Written advice recommends prosecution?

NO? Advice of No Further Action to **Head of Security** to approve.

YES?

Advice sent to **Head of Security** for POL sign off/ approval

Sign off obtained from **Head of Security**?

NO? Further discussion/ input obtained from **External Lawyers**?

NO?

YES? Charges returned to **Investigations & Security Team** to issue summons

Prosecution

Conviction/ Guilty Plea entered

NO? Close file.

YES? Request Compensation Order or consider lodging Notice under POCA to commence Confiscation Proceedings if deemed appropriate, in line with **External Lawyer** advice and EPP.

Confiscation Proceedings deemed appropriate?

NO?

YES? Instigate Confiscation Proceedings