

## IN CONFIDENCE

# Managing shortages at Audit: Process and Policy guidelines.

### 1. Introduction and background.

From time to time intervention will be required where audit shortages have been identified by field teams. The purpose of this document is to provide guidance on the process to be followed by all managers who are involved in managing these cases. They are not intended to provide the outcome or cover every scenario that may arise.

The process to be followed is detailed on the embedded documents below; please make sure that all of these documents are used in conjunction with one another when managing these cases.



Managing shortages  
at Audit 070911.vsd



Managing shortages  
at audit word vsn 070

These guidelines should be read in conjunction with ACC 12/09 and ACC 08/11.

### 2. Narrative to support decision making.

#### Box 5.

The field Support Advisor (FSA) should report audit shortage to the Contracts Advisor (CA). The areas to be covered by the FSA are shown in the embedded document under the heading 'Information needed by CAs when audit discrepancies are reported'



FSA Requirements at  
Audit CLEAN 250711.

#### Box 7.

The Contracts Advisor (CA) will need to determine the action to be taken. Guidelines are provided to assist the decision making process, this document is not case specific but provides details of areas that generally should be covered.



Guidance note  
CLEAN 250711.doc

For all cases referred to a CA by a FSA following the identification of a shortage at audit the embedded document 'Record of Suspension Decision' must be completed detailing the rationale for the decision made at this stage. The document will form part of the conduct case paperwork if precautionary suspension is the decision. If the decision is not to precautionary suspend, the document is to be filed with the branch records on the EFC, however the decision making manager may decide other action is required and this must be recorded on the form. Each form is to be signed and dated by the decision making manager.



Record of  
Suspension Decision I

Where the decision is precautionary suspension the following template is completed and circulated advising key stakeholders of the action taken.

Embedded doc – Suspension notification template



Suspension  
notification template

The scenarios have been removed as this is clear from the process

### **Box 8.**

CA contacts the suspended Agent by telephone to discuss next steps in respect of the conduct process e.g. charge letter inviting to RTU / providing written representation / who can attend RTU, provisionally arranging a date for the RTU meeting, and advises agent they may wish to seek NFSP representation. The different outcomes are explained and the Agent is advised about being able to resign to avoid termination. No advice regarding the case will be offered to the Agent at any stage. If the outstanding debt identified at audit has not been repaid the CA will establish what arrangements will be made to repay this debt. Records of conversations held with the Agent should be saved to the conduct case file. The Security team may also decide to investigate this case following notification of the precautionary suspension.

### **Box 13**

The TSA should ensure that the suspended agent is aware of any options

regarding use of the premises, and that he is aware that it is for him to agree arrangements with a temporary agent regarding any rental charges etc.

**Box 15.**

The CA will then consider whether precautionary suspension is the correct continued course of action following a review of the evidence available or if the Agent can be reinstated. Part of this review will be to check with the Security Team in respect of ongoing investigations.

**Box 16**

If the decision is to reinstate the Agent a decision document must be completed and agreed with the Agents Contracts Deployment Manager detailing the rationale for the decision and any associated conditions attached to the reinstatement. A follow up audit must be arranged. This document is saved with the conduct case papers – all documents related to the case are saved to the branch EFC.

**Box 20.**

Where NFSP representation is present the CA should cc the RTU notes to the NFSP representative.

**Box 21.**

Although each case will be different, all factors should be taken into account by the CA during the course of the investigation. Examples of factors to consider:

- Whether the agent had, or had tried to cover up the offence at the time through manipulation of the branch accounts.
- Whether the Agent has been precautionary suspended for a similar offence previously
- Whether records indicate the Agent has looked for help to resolve the problem or reported the problem when it arose e.g. NBSC records etc
- Whether the Agent had admitted and accepted personal responsibility for the offence from the outset i.e. an admission was recorded at audit or later in the conduct process.
- Whether the Agent's record shows that they have a disregard for rules, or that their general performance is poor.
- Whether the Agent was acting under some form of duress, or threat.
- Whether the Agent has shown genuine remorse for the offence.
- Whether the Agent's behaviour was out of character compared to their track record generally.
- Whether the Agent has been able to demonstrate how further offending will

be avoided.

- Whether there is evidence that the Agent was taking medication, or was suffering from some disorder that would have affected their judgement and decision making.

The factors are recorded on the 'record of decision case document' embedded below and will be categorised under key points in the case as presented by the Agent – positive and negative and key points in the case as presented by POL – positive and negative in relation to the charges against the Agent. The Contract Advisor will provide a qualified recommendation on the case based on the balance of probabilities. The document must clearly indicate why the particular course of action has been recommended and why any other course of action has been excluded. The document is reviewed by the Agents Contracts Deployment Manager and the decision is either endorsed or changed – if changed reasons are to be given for the change and these details are recorded on the form. If the decision is to reinstate the Agent any conditions of reinstatement must be recorded with the recommendation. This document is saved with the conduct case papers – all documents related to the case are saved to the branch EFC.



Record of Conduct  
Case Decision CLEAN

### **Box 23**

The Contract Advisor notifies the Agent of the decision on the case and takes appropriate action depending on whether the decision is to reinstate the Agent or summarily terminated the contract for services.