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1.	<p>PURPOSE</p> <p>The aim of this policy is to set out clear instructions to investigators when questioning persons.</p>
2.	<p>LINK TO ACCOUNTABILITIES</p> <p>Security Managers</p>
3.	<p>POLICY</p>
3.1	<p>GENERAL</p> <ul style="list-style-type: none"> • Inquiries by investigators are mainly concerned with potential or known criminal offences against Consignia. It is the duty of all officers to make those inquiries in order to ascertain the facts and then to report upon them, giving their own conclusions. • A successful detective operation relies upon the skill of investigation staff, in questioning persons from whom useful information may be obtained about offences that have been committed. This is a highly sensitive area of investigation, bristling with issues affecting civil liberties. These pose difficulties for police, and in certain circumstances, place civilian detectives at an even greater disadvantage. It is essential therefore, that all investigators pay close attention to the detailed guidance given in this Policy, and apply it in a way that fosters good relations with all persons who have to be questioned on behalf of Consignia. • Investigators are called upon to question persons who are suspects as well as others who may be merely in a position to give information and the utmost care is necessary in the performance of this important part of investigation work. • Investigators must necessarily be allowed discretion in the conduct of an interview but should ensure fair methods of questioning are used. Any offer by a suspect to disclose information in return for an undertaking or promise not to prosecute should be refused. Apart from the impropriety of accepting such an offer, the giving of such an undertaking or promise might, depending on the circumstances, amount to the offence of concealment of evidence contrary to Section 5 of the Criminal Law Act 1967. Investigators should ensure they are familiar with and adhere to the standards of professional behaviour set out in "Rules and Standards". • Careful judgement should be exercised before an investigator approaches a member of Consignia staff for interview at his/her place of work as unions have complained that this approach procedure is liable to cause unnecessary indignity to Consignia staff. An investigator must be allowed full discretion to decide (a) when he/she should invite a member of the staff for interview or (b) when to ask a local supervising officer to do so bearing in mind the special treatment afforded to young people who have not reached their 18th birthday (paragraph 3.6 below refers).. A local supervisor can do this whenever reasonable or practicable in cases where there is no reason to suspect the individual of any offence but for all suspect interviews with members of staff of 18 years or over the initial approach must be made by the investigator and second officer. <p>It is not essential to have a support officer present when persons who are merely giving information are interviewed. However, the lead officer must have a support officer present when a suspected offender (or a person that might become suspect) is questioned.</p> <ul style="list-style-type: none"> • The support officer should be another investigator or a member of the support team who has had relevant PACE training. • The presence of more than two officers at an interview with a suspected offender is likely to be

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seized upon by the defence in a court of law as an argument, on grounds of intimidation, against the admissibility of evidence of any admitted guilt made at the interview. Where possible, therefore, the investigators should be limited to two. If a trainee is present as a third party, he/she should be inconspicuous and not take any part in the questioning of the suspect. It is also good practice for the lead officer to seek the consent of the interviewee for the trainee to remain at the interview as an observer.

- The reasons for the presence of a support officer are chiefly as a witness to the conduct of the interview; that he/she may, if it becomes necessary as the result of any statement made by the suspect, make immediate subsidiary inquiries in order that the investigation can be completed there and then; that he/she may go to the assistance of the officer in charge of the case if any violence is attempted by the suspect. This does not preclude the support officer asking questions not already asked by the lead officer or if necessary reminding the lead officer of PACE requirements, facts or exhibit numbers.
- Prior to the start of a suspect interview, every person to be questioned must be told of the investigators' identities, what the inquiry is to be about and be cautioned. A record of this conversation must be written in the investigator's notebook. Any reply made must be recorded, timed, dated and signed by the investigator and the suspect. A suspect should be under no misapprehension about the fact that he is facing a criminal investigation because he is suspected of having committed a criminal offence.

3.2**INTERVIEWS UNDER PACE**

It is Consignia policy that interviews of suspected offenders, except in Scotland, are tape recorded. The PACE Code of Practice E deals with tape recording of interviews with such suspects. There will be occasions where the use of tape recorders is impracticable and the situations where hand-written Notes Of Interview are an acceptable alternative are set out below. It must be clearly understood, however, that tape recording is Consignia standard and that hand-written notes should be the exception rather than the rule.

- Hand-written Notes Of Interview are acceptable in the following circumstances:
 - (a) Malfunction of the tape machine and no alternative available.
 - (b) Interviews conducted in private premises where due to the nature of the area it would place the Interviewing Officer at risk to carry or seek to use portable recording equipment.
 - (c) Interviews conducted where the interviewee does not consent to tape recording. In these circumstances Code E 4.5* of the Codes Of Practice must be followed.
- Notes Of Interview must comply with the requirements paragraphs 11.5 to 11.13* of Code C. Under paragraph 11.13 a written record shall also be made of any comments made by a suspected person, including unsolicited comments, which are outside the context of an interview but which might be relevant to the offence. Details of such comments, including conversations on the way to an interview, should be recorded in the investigator's notebook, and timed and signed by the maker. Where practicable the person should be given the opportunity to read that record and sign it as correct or to indicate the respects in which he considers it inaccurate. Any refusal to sign should be recorded.

* E 4.10 in NI Codes of Practice.

* Paragraphs 11.8 to 11.15 of the NI Codes of Practice

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	<ul style="list-style-type: none"> • In addition to the completion of the form CS001, the Notes Of Interview should include a record of the full explanation of legal rights. The form CS001 is not an acknowledgement form that the interviewee has been told of his rights but a form to record the interviewee's decisions. Any discussion concerning the form must be recorded in full in the Notes Of Interview as they would have been on tape. • Courts are now more familiar with cases where interviews have been tape recorded and it may be queried why Notes Of Interview were used. To enable such queries to be answered it is essential that in all cases where tape recorders are not used the reasons are explained in the investigator's report and those reasons comply with the exemptions above. • Any person at a PACE interview not under arrest is free to leave at any stage. If, therefore, a suspected offender declines to answer questions or asks to leave, either before or after consultation with his solicitor, he cannot lawfully be compelled to speak or to stay. As regards a refusal to answer questions, he should be reminded that he may harm his defence if he does not mention something which he later relies on in court. When, in such circumstances, there is strong reason for thinking (e.g. in 'test' letter cases) that the suspect is in possession of identifiable stolen property, which could be destroyed if he were allowed to go, the question of arresting him and handing him into custody without further questioning, should be considered on the spot - after consultation with the investigator's Senior Manager if practicable. Powers of arrest are dealt with in "Arrest Procedures" and details of arrestable offences are given at Appendix 5. This decision requires careful judgement as it might later give rise to a claim for false imprisonment if it transpires that no crime has been committed. Wilful delay and opening of mail are not arrestable offences. • The restriction on smoking in Consignia premises has raised the question about smoking during interviews. The problem concerns whether a suspected offender being interviewed under PACE in a PO building should if he/she is a regular smoker be allowed to smoke. Legal Services advise that Sections 76 and 78 of Police and Criminal Evidence Act 1984 refer. These sections relate to fairness, reliability of confessions and oppression. It could be claimed that it would be unfair, oppressive or a fact that may lead to the confession being unreliable to refuse a suspect the opportunity to smoke at an interview in what is obviously a stressful situation. It is considered therefore, that a no smoking policy in the circumstances described could give rise to a potential breach of PACE and there is the chance that a confession could be successfully challenged by a regular smoker who is denied the opportunity to smoke. Accordingly, in order to avoid such a challenge being made, smoking may be allowed during the course of the interview. Care should be taken, however, to ensure other Consignia staff are not inconvenienced. • The requirements for recording interviews with suspects under PACE is given at Appendix 1. A quick reference guide to taped interviews is at Appendix 1a. • The Police and Criminal Evidence Order (Northern Ireland) 1989, came into force on 1 January 1990. It is similar in every way to that which covers England and Wales. Codes of Practice were issued (Article 65) and these must be adhered to at all times. The procedure for tape recorded interviews is given at Appendix 3.
3.3	<p>INTERVIEWS IN SCOTLAND</p> <p>The Scottish system of criminal law is different from the English system and objection is sometimes taken in Scotland to the practice of cautioning and questioning suspected persons. The procedure to be followed when interviewing persons under caution is given at Appendix 2.</p>
3.4	<p>PROCEDURES IN THE CHANNEL ISLANDS AND ISLE OF MAN</p>

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	<ul style="list-style-type: none"> • CHANNEL ISLANDS <p>Prior to any questioning taking place, SIS officers should liaise with the local Police.</p> <ul style="list-style-type: none"> • ISLE OF MAN <p>All enquiries affecting the IOM are dealt with by SIS. The procedure when questioning suspects is in accordance with the IOM voluntary code of practice based on PACE. Prior to any questioning taking place, Investigation Officers should liaise with IOM police.</p>
3.5	<p>FRIENDS AT INTERVIEWS</p> <ul style="list-style-type: none"> • Every member of staff and every Sub-Postmaster, Sub Office assistant and private employee of a Sub-Postmaster who is interviewed by an investigator, for whatever purpose, must be offered the presence of a friend at an interview. It should be made clear to the suspect that the offer of a friend is an additional right not a replacement of the right to have a solicitor. • Page 2 of form CS001 carries a printed summary of the rule relating to 'friends' at Investigation interviews. If the 'friend' offer is declined, the person being interviewed should insert the words used in reply. If, however, a friend is requested, this should be recorded by the interviewee, adding the exact form of the request, e.g. "I should like Mr A N Other, PHG in the Book Room, to be present". While the nominated friend is summoned, the completed certificate on form CS001 should be signed by the person to be interviewed, and when the friend attends, the investigator should ask him/her if he/she agrees to remain present at the interview. If the friend agrees to remain, the investigator should ask him/her to read and also sign form CS001. The completed form CS001 should be enclosed in the case file. If a copy is requested by the person interviewed, a copy should be issued immediately. If no photocopy facilities exist, a copy should be forwarded as soon as possible. • Form CS003 may be used as an alternative 'friend' form during information gathering and non suspect interviews; however, form CS001 must always be used during suspect offender interviews. • At any interview at which the person being interviewed initially declines to have a friend present, but changes his mind later and asks for an available officer to be called, the request should be granted. The changed request should be recorded on form CS001 or CS003 with a note of the time it was made and countersigned by the person interviewed. • If the offer of a friend is accepted, the person to be interviewed should be asked to nominate a friend. It should be carefully explained that friends are defined as follows:- A friend invited to attend an Investigation interview must be aged 18 years or over, and cannot be someone involved in the inquiry. He or she must be an employee of the relative Business or Department (for SPSO staff this may be extended to include Sub Postmasters, SO Assistants provided they are not potential witnesses or involved in the inquiry) who may be the local Union Representative or an official of the recognised Union. • The investigator in charge of the case should exercise discretion as to the extent to which any inquiry may properly be delayed in order to secure the attendance of a friend, especially if the latter is not on duty. • When it is clear that the inquiry will not be adversely affected, all reasonable latitude should be allowed on the question of delay. If, however, delay would be likely to prejudice the success of the inquiry, the investigator may refuse to wait while a person, who is not readily available - e.g. not on duty, - is sent for, and in that event he should inform the person to be interviewed accordingly, and

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ask him if he wishes to have present any other person who is immediately available. If the person to be interviewed replies in the negative, the interview should proceed without a friend.

- When the friend asked for is a local staff representative his arrival should be awaited provided that any delay is not excessive and the nature of the inquiry permits. The investigator in the case should exercise discretion as to the extent to which the inquiry may properly be delayed, pending the arrival of the staff representative, but if such a request has to be refused, the investigator should be in a position to justify his refusal, i.e. he must have very convincing reasons to justify his refusal.
- In quite exceptional cases, it may be clear that the delay necessarily involved in arranging for the attendance of any friend will destroy or gravely jeopardise the effectiveness of an inquiry, and in such circumstances, a request for the presence of a friend should be refused. Before exercising this power, however, the investigator must be satisfied that he can effectively discharge the onus resting on him of justifying that the circumstances warrant his action.
- It may be necessary to refuse to permit a nominated friend to be present at the interview for reasons other than delay, e.g. that the friend himself is under suspicion, or has been involved in the preliminary inquiries to such an extent that it could reasonably be argued later by a sceptic that the friend was not an impartial person. The investigator, having satisfied himself that he has good grounds for his refusal, should tell the person to be interviewed, with an expression of regret, that he cannot agree to the presence of that particular officer and should ask that person to nominate some other officer who would be acceptable.
- The presence of friends at the searches of the lockers and homes of suspect staff is dealt with in "Searching."
- In those cases where it is decided to stop a fact finding interview at the stage where suspicion is directed to the person being interviewed, and to proceed with the questioning after caution and legal rights, the renewed offer of a friend and the reply should be recorded on tape or in the record of the interview. Form CS001 (sides A & B) must be completed.
- When a suspect - either a member of staff or an outsider - having been stopped or intercepted by an investigator, declines an invitation to accompany that officer for interview, the investigator concerned must first ensure that the refusal does not arise from any misunderstanding or doubt on the suspect's part as to the identity of the intercepting officer or, particularly in the case of staff, his authority to make such a request. If a suitable explanation on these points (and, if necessary, of the circumstances causing the invitation) does not result in willingness to attend the interview, the question of arrest will arise and is described in "Arrest (Procedures)."

3.6 CHILDREN AND YOUNG PERSONS

- In England and Wales the age of criminal responsibility is 10 years. Accordingly, no child under the age of ten years can be guilty of an offence.
- For investigation and interview purposes, paragraph 1.5 of Code C of the PACE Codes of Practice provides that *"if anyone appears to be under the age of 17 years, he shall be treated as a juvenile for the purposes of this Code in the absence of clear evidence to show that he is older"*. **A juvenile, whether suspected or not, must not be interviewed or asked to provide or to sign a written statement in the absence of an appropriate adult** unless the circumstances are such to pose an immediate danger to persons or serious harm to property that will be required as evidence connected with an offence (paragraph 11.14 and annex C of Code C refer). The appropriate adult is to be reminded of his/her functions as adviser and observer as well as to facilitate communication with the person being interviewed (paragraph 11.16 of Code C refers). An estranged parent cannot

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	<p>fulfill the role of appropriate adult if the juvenile expressly and specifically objects to his or her presence.</p> <ul style="list-style-type: none"> The juvenile to be interviewed must have an appropriate adult present. An appropriate adult means his/her (a) parent, (b) guardian, (c) if he is in care, the care authority or voluntary Organisation, (d) a social worker or, (e) failing any of these four options, another responsible adult aged 18 years or over who is not a police officer or employed by the police, nor an investigation officer or employed within Consignia Security Community. In addition, the appropriate adult should not be a potential witness or suspected of being involved in the offence in question. If an appropriate adult is not available to attend the interview, the interview should be postponed until an appropriate adult is available. For the purposes of investigating and interviewing 17 year olds, they are treated in the same way as an adult, i.e. it is not necessary for an appropriate adult to be present at the interview. Consignia has granted persons who have reached the age of 17 years but have not yet reached their 18th birthday special treatment in one area. The person to be interviewed should be met in the presence of a responsible supervising officer who has not been concerned in the enquiry (this applies to suspects or witnesses). The officer introducing Consignia juvenile should be asked to tell him/her the nature of the proposed interview and to fully and sympathetically explain the rule which gives him/her the opportunity to have a "friend" present. The provisions above also apply to Consignia juveniles. For the purposes of the courts and the remainder of the criminal justice system, a "child" means a person under the age of 14 years and a "young person" means a person who has attained the age of 14 years and is under the age of 18 years. Special considerations apply in deciding whether or not to prosecute a child or young person. In areas where the final warning system for children and young people is not yet in force, Consignia may, in appropriate cases, caution the child or young person or prosecute the child or young person in the Youth Court. The appropriate Youth Liaison Panel should be consulted and their recommendations obtained. In areas where the final warning system for children and young people is in force, Consignia will no longer be able to caution those under 18 years of age. In the event that some action short of prosecution is appropriate, Legal Services will advise whether or not the child or young person should be referred to the police to be dealt with under the final warning system. The appropriate Youth Offending Team should be consulted and their recommendations obtained if a child or young person is to be prosecuted. Pilots of the final warning scheme began in six areas on 30 September 1998 and will run for 18 months in total. Subject to the outcome of the pilots, the Government's stated aim is formally to bring the provisions concerning final warnings into nation-wide operation during 2000 - 2001. For the purposes of court appearances, those under the age of 18 years at the time of their first court appearance should usually be summonsed to the Youth Court. In the event that a child or young person is jointly charged with a person of 18 years or over, the first court appearance will be in the Magistrates' Court."
3.7	<p>SUSPECTS ON SICK LEAVE</p> <ul style="list-style-type: none"> In most cases the questioning of individuals who are on sick leave can be delayed until they resume their normal duties. When, however, because of excessive delay or because a specific case is

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	<p>judged to merit immediate questioning advice must be sought from the employee's medical practitioner to establish whether there is any reason why the individual should not be interviewed. It must be made clear that the inquiry is related to a criminal matter and, if the nature of the illness is a serious complaint (e.g. heart attack, depressive psychological disorder etc.) the advice of the medical practitioner should be requested in writing and a copy of the letter and details of the reply should be filed in the papers. In urgent cases where this is not possible and a personal visit is made to the medical practitioner a second officer should be present and the facts duly reported.</p> <ul style="list-style-type: none"> • Under PACE Code C if an individual has a mental disorder then they must be accompanied at interview by an appropriate adult. The definition of mental disorder under Section 1(2) of the Mental Health Act 1983 is set out in Note 1G of PACE Code C. • From time to time, the surveillance skills of investigators are requested to establish evidence in cases where employees are suspected of behaving in a manner inconsistent with sick leave, e.g. working elsewhere. Unless the individual is the subject of investigation on other offences, any subsequent interviews will not normally be conducted by an investigator. In circumstances where an interview is to be conducted by an investigator, a case conference should be arranged beforehand with Personnel. Care must be taken to avoid questioning on medical matters but restrict it to the facts of what the individual communicated to the employer, when he visited his GP, what was observed and any comment on perceived inconsistencies between his behaviour and the sick absence he has taken.
3.8	<p>CUSTOMS AND EXCISE</p> <ul style="list-style-type: none"> • At certain Offices of Exchange postal packets are examined for Customs purposes by Customs Officers and it sometimes happens that such officers may steal from the post or commit other offences against Consignia. • Customs officers under suspicion must NOT be questioned by investigators, but the matter must be reported urgently to a Senior Customs Officer. The course of action to be taken will then be decided by the suspect's senior officer.
3.9	<p>BRITISH TRANSPORT POLICE</p> <ul style="list-style-type: none"> • Railway staff should normally be questioned by British Transport Police in cases of offences against Consignia. However, it is usual for a Consignia investigator to be near at hand at interviews with suspected offenders, particularly if the contents of 'test' postal packets made up by Consignia have to be identified or if the facts of the case are complex. It should be left to the British Transport Police to take any statements required and to conduct or organise any search of person or premises. • Any confidential information concerning Railway staff must be obtained by an approach to the British Transport Police.
3.10	<p>PERSONS IN PRISON</p> <ul style="list-style-type: none"> • Investigators cannot interview persons in prison without prior permission of the prison Governor. Form CS092 is to be used for this purpose. • The Procedure for interviewing prisoners is given in Circular Instruction 10/1989 issued to all prison establishments and now reproduced at Appendix 1b. The circular refers specifically to Police Officers but the rules apply to other agencies including Consignia Investigators. • Where it is decided to interview a prisoner on matters outlined, the prisoner may be interviewed subject to his consent.

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	<ul style="list-style-type: none"> If the prisoner admits a criminal offence and Consignia or other customer later decides not to institute criminal proceedings the Prison Governor must be informed without delay by letter. It should embody a request that the prisoner be informed of the decision.
3.11	DOCUMENTS AT INTERVIEWS <ul style="list-style-type: none"> Investigators when questioning suspected offenders should not show complete files of papers to the suspect and record in the notes of interview (or on tape) "Shown File papers". Documents shown to a suspect - who may later be prosecuted - usually become exhibits in the case. Exhibits must be clearly identified by exhibit numbers. It is desirable, therefore, that complete files should not be subjected to that risk unnecessarily. Whenever possible, Investigators should endeavour to overcome the difficulty by separately showing the suspect the individual documents e.g. the mistreated cover; the form P58, the schedule or list of recorded losses, as the case may be. If an accounting document required at an interview and likely to be retained by an Investigator is withdrawn from a Consignia, arrangements should be made either for a duplicate to be prepared and marked "original withdrawn by case papers" (this will usually apply to Saving Bank withdrawals) or for a form to be submitted with the accounts in its place (e.g. postal orders; pensions and allowances). If there is a request for a copy of any document shown to a person interviewed the general policy is to grant it whenever this is practicable by supplying a photocopy.
3.12	FACT FINDING / WITNESS STATEMENT INTERVIEWS <ul style="list-style-type: none"> If, in the course of an investigation, it is decided to question employees (including SPSO staff), who are not suspected persons, but from whom it is considered that useful information may be obtained, written statements in narrative form should be taken down. Statements obtained are submitted in accordance with the provisions of section 9 of the Criminal Justice Act 1967, on forms CS011, so that they can be produced in evidence to the courts, if necessary. If a member of the staff who is not suspected of a specific offence and who has not been cautioned refuses to answer any questions put to him, it may be pointed out to him that Consignia as his employer, is justified in expecting a member of the staff to answer personally any question put to him on a matter arising out of his official duty. If he should maintain his refusal, it should be pointed out to him that this will lead to the inference that he has no satisfactory explanation to offer and he should be informed that his attitude will have to be reported to his manager
3.13	PO NETWORK CASES <ul style="list-style-type: none"> There is particular need for tact and discretion when questioning Sub Postmasters; members of their family; Sub Office assistants or their private employees. The need arises partly from their independent position (e.g. as shopkeepers) in the local community and partly from their contractual relationship with PON. In the case of Sub Postmasters and their assistants, not only do they feel themselves to be different from Crown Office staff but also their experience of official procedure is often very limited and there is all the more room for misunderstanding and suspicion. When a Sub Postmaster is invited to give details of his private financial position it should be explained that although he is not obliged to give the information it would be of value for the purposes of the inquiry. As a matter of courtesy, Sub Office Assistants and private employees of a Sub Postmaster should

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	<p>not be interviewed without the prior knowledge of the Sub Postmaster unless this would prejudice the inquiry.</p> <ul style="list-style-type: none"> Special care should be taken and the Business should be consulted at all times before any enquiries are undertaken at a Franchised office. 					
3.14	PARTNER SUSPECT <ul style="list-style-type: none"> The questioning of a partner in order to obtain information which may adversely affect the other partner in the relationship lends itself to criticism, but it is recognised that it must be left to investigators to use their discretion according to the circumstances of each case. Investigators should not question the partner of a suspect mainly with the object of obtaining evidence generally. Such inquiries should be confined to confirming, or otherwise, specific points of an essential character. When an incriminating statement has been made by the partner of a suspect and other grounds exist for questioning him, he should be interviewed, at first, without reference to any information obtained solely from the other partner. If, after such questioning, it is clear that there is no evidence which is likely to secure conviction, the suspect should be told that a statement made by their partner will be read to them in order that they may have the opportunity, if they so desire, of making comments upon it. They should not be pressed to make such comments if they do not wish to do so. A suspected person should not be given into custody by an investigator when the evidence rests wholly or substantially on that which could only be given by their partner. 					
3.15	INQUIRIES AT PLACE OF PRIVATE EMPLOYMENT <ul style="list-style-type: none"> Neither part-time Consignia staff nor outsiders should normally be questioned at their places of private employment. In altogether exceptional cases - e.g. where it can be demonstrated that not to do so would prejudice the success of the inquiry or where the inquiry affects the employer's business - inquiry may be made at the place of private employment but the investigator must then refrain, as far as possible, from saying anything to the employer or other employees which might prejudice the person concerned. 					
3.16	MASS QUESTIONING <p>When it is foreseen that an investigation will involve the questioning of large numbers of staff, the matter should be discussed with the investigator's line manager and Head of Personnel before any interviews are conducted.</p>					
3.17	PREVIOUS LOCAL ENQUIRIES <ul style="list-style-type: none"> There is no reason why previous local management enquiries should prevent a criminal investigation provided the facts and details of previous interviews/enquiries are retained as unused material, and enclosed in the papers to Legal Services 					
4.	Links to other reference material (policies, processes and procedures, etc.)					
	Title	Author	Located	Version	Type	Policy No.
4.1	Criminal Law (Sec 5)		HMSO	1967	Act	3.1
4.2	PACE (Code E)		Library	1984	Act	3.2
4.3	Criminal Evidence Sections 76 & 78		HMSO	1984	Act	3.2
4.4	PACE (Code C)		Library	1984	Act	3.6 & 3.7

4.5	Criminal Justice	HMSO	1967	Act	3.12
5.	Document details				
5.1	Author :				
5.2	Owner :	Head of Corporate Security			
5.3	Audience:	Security Community			
5.4	Enquiry point :	Programme Manager, Law & Legislation, Corporate Security, 4 th Floor, Impact House, 2 Edridge Road, CROYDON, CR9 1PJ			
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7.1	Approved by				
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