

Royal Mail Group

An Inspection of the Royal Mail Group Crime Investigations Function

July 2008





Royal Mail Group

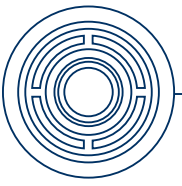
An Inspection of the Royal Mail Group Crime Investigations Function

July 2008

Presented to the Houses of Parliament by the Secretary of State for Northern Ireland under Section 49(2) of the Justice (Northern Ireland) Act 2002.

**Criminal Justice Inspection
Northern Ireland**
a better justice system for all







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List of abbreviations

CHIS	Covert Human Intelligence Source
CJI	Criminal Justice Inspection Northern Ireland
CJS	Criminal Justice System
CPS	Crown Prosecution Service (in England and Wales)
E & W	England and Wales
GLS	General Logistics Services
HMRC	Her Majesty's Revenue and Customs
IOCCO	Interception of Communications Commissioner's Office
ITM	Investigation Team Manager
MoU	Memorandum of Understanding
NI	Northern Ireland
NPIA	National Police Improvement Agency
OSC	Office of the Surveillance Commissioner
PACE	The Police and Criminal Evidence (NI) Order 1989
PaLMS	Performance and Learning Management System
PITO	Police Information Technology Organisation
PNC	Police National Computer
POL	Post Office Ltd
PostCOMM	Postal Service Commission
PostWatch	Independent watchdog for postal services in the United Kingdom
PPS	Public Prosecution Service for Northern Ireland
PSNI	Police Service of Northern Ireland
RIPA	Regulation of Investigatory Powers Act 2000
RMG	Royal Mail Group
RML	Royal Mail Limited
SPoC	Single Point of Contact
UK	United Kingdom



Chief Inspector's Foreword

Royal Mail Group maintains a security function responsible for investigating crime against its businesses. Locally this function is made up of a small unit of investigators reporting through a territorial head whose responsibility includes Northern Ireland. Royal Mail pursues its local prosecutions through the Northern Ireland criminal justice system.

The inspection looked at the investigative function of the Royal Mail Group in Northern Ireland using the five main elements of our common core; Openness, Partnership, Equality, Learning and Results. Royal Mail Group produced a detailed self-assessment of good quality and had already identified some areas for development.

The small investigative team operating in Northern Ireland was effective and well managed. An excellent quality assurance system had developed skilled investigators who produced good quality case files based on sound investigations.

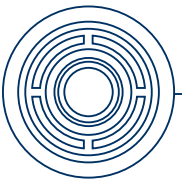
Inspectors found that the methods of case submission in Northern Ireland differed from England and Wales and there had been some anomalies in case outcomes. Case files are channelled through an internal quality assurance system before being submitted to the PSNI for onward transmission to the PPS for a prosecutorial decision. This system is more complex than it should be and increases the risks of delay and lost files. Inspectors recommend that Royal Mail Group in Northern Ireland establishes a more direct method of presenting their cases for a prosecution decision.

Inspectors also believe that a direct case submission link between the PPS and Royal Mail would better enable prosecutors to provide investigators with reasons for decisions. Under the existing complex submission system involving PSNI as a third party, reasons for decisions are not made available directly to Royal Mail investigators. We therefore reiterate the recommendation made in our report, 'Public Prosecution Service Northern Ireland' published in July 2007: *'Directing lawyers should explain fully their reasoning to the agency in cases where they direct no prosecution or where their decision is different from that recommended by the investigator'*.

This inspection was led for CJI by Bill Priestley. I would like on his behalf to thank all those whom he contacted in the course of the work.



Kit Chivers
Chief Inspector of Criminal Justice
in Northern Ireland
July 2008





Executive Summary

This inspection looked at the operation of the investigative element of the Royal Mail Group (RMG) in Northern Ireland (NI) using the five main headings of Criminal Justice Inspection's core matrix: Openness, Partnership, Equality, Learning and Results.

RMG is subject to inspection and regulation by the Interception of Communications Commissioner's Office (IOCCO) and the Office of the Surveillance Commissioner (OSC) under the Regulation of Investigatory Powers Act 2000 (RIPA). The most recent RIPA inspections had taken place during 2007 and this aspect of the business was excluded from the terms of reference of this inspection. Nationally, RMG had also been subject to oversight by the Police Information Technology Organisation (PITO) with regard to its usage of the Police National Computer (PNC). However, NI criminal records had been held locally and RMG in NI had made limited use of records held on the PNC.

Inspectors found that the RMG investigative element in NI was a small, effective and efficient unit that was subject to excellent quality assurance systems. These systems had produced good quality case files, professional investigations, and skilled investigators. The quality assurance systems had been operated robustly for two years and this had improved case file quality and the standard of investigations. Inspectors recommend that the system should now move to one based on dip-sampling rather than a detailed examination of every case file submitted.

Case files were of high quality and casework staff and managers said that files submitted by the team of investigators compared favourably with those from other areas. However there were anomalies in case outcomes between the two jurisdictions. Case numbers in NI had been low so direct statistical comparison with E & W was not possible. Nevertheless, in the few cases submitted in NI the percentage dealt with by way of caution had been higher than in E & W. There had also been fewer immediate custodial outcomes as compared to the rest of the UK.

In E & W prosecution advice and direction is provided by the RMG Criminal Law team which is positioned independently from the RMG Crime Investigations function applying Crown Prosecution Service (CPS) guidelines. In NI advice and direction is provided by the PPS using similar guidelines. However, the overly complex case submission process had meant that reasons for decisions made by prosecutors had not been made available to the RMG case investigators. In the absence of explanation by the prosecutor as to why a caution or no prosecution was directed (as opposed to prosecution) RMG had been unable to establish detailed reasons for apparent anomalies in case outcomes in the figures between the two different jurisdictions. The CJI report 'Public Prosecution Service Northern Ireland' published in July 2007 recommends that, '*Directing lawyers should explain fully their reasoning to the agency in cases where they direct no prosecution or where their decision is different from that recommended by the investigator*'. Inspectors believe that the provision of



reasons for prosecutorial decisions directly to RMG investigators may help clarify reasons for discrepancies in outcomes between the jurisdictions and therefore reiterate that recommendation.

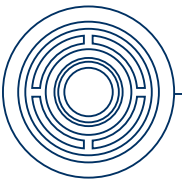
The small team of investigators in NI comprised three from Royal Mail Letters as well as one team leader. In addition there was one investigator from Post Office Limited and a Royal Mail Security Risk manager. The extended team had worked well together and had assisted with investigations that had strictly fallen outside their particular business area. This had improved resilience and had provided support for investigators at short notice but it had been done informally. Inspectors recommend that RMG security should formalise a flexible approach to investigations so that local investigative staff can be shared across its business areas in NI in response to demand.

Inspectors found that on first submission RML investigators' case files contained only tape summaries whilst those submitted by the POL investigator had full transcripts included. Transcribing taped interviews is a time consuming exercise and Inspectors were told that it had impacted on investigation time. Inspectors recommend that the requirement for routine preparation of full tape recorded interview transcripts should be reviewed in consultation with the PPS.



Recommendations

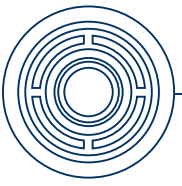
- Inspectors recommend that arrangements between RMG and the PSNI are reviewed to produce an agreed Memorandum of Understanding (paragraph 3.2).
- To improve efficiency and reduce delay Inspectors recommend that RMG establishes a more direct method of presenting their cases for a prosecution decision (paragraph 3.6).
- Inspectors recommend that the quality assurance system for investigations should be revised to adopt dip-sampling of case files as the default method of maintaining quality (paragraph 4.5).
- Inspectors recommend that to improve efficiency and reduce the risk of delay that Post Office Ltd cases are submitted by a more direct method as recommended for RML cases (paragraph 4.6).
- To improve resilience and support Inspectors recommend that RMG security formalises a flexible approach to investigations so that local investigative staff can be shared across its business areas in NI in response to demand (paragraph 4.7).
- Inspectors recommend that the routine preparation of full tape recorded interview transcripts should be reviewed in consultation with the PPS (paragraph 4.8).
- Reiteration of previous recommendation made in CJI report, '*Public Prosecution Service Northern Ireland*' published 2007 '*Directing lawyers should explain fully their reasoning to the agency in cases where they direct no prosecution or where their decision is different from that recommended by the investigator*' (paragraph 3.10).



Section



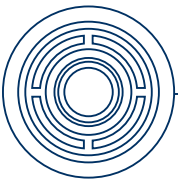
Inspection Report



Introduction



- 1.1 Royal Mail is the state owned provider of postal services for England, Scotland, Wales and Northern Ireland. The Royal Mail Group (RMG) is made up of four business units;
 - Royal Mail Letters (RML)
 - Post Office Limited (POL)
 - Parcel Force
 - General Logistics Services (GLS).
- 1.2 The legislative framework is well established. Postal Services in the UK operate under The Postal Services Act 2000 (The Act). The Act enabled the Postal Services Commission (PostCOMM) to include conditions in the RMG licence under section 13 of the Act. Condition 8 in Royal Mail's licence concerns the integrity of the mail and requires Royal Mail to agree Mail Protection Procedures with PostCOMM. Under these procedures Royal Mail is committed to investigate and prosecute those who dishonestly acquire Royal Mail property or assets or the property or assets of Royal Mail customers and clients whilst in Royal Mail custody. RMG is also under obligation to allocate responsibility to specific personnel for meeting the recording, reporting and other requirements.
- 1.3 Since 1989 RMG Investigators in Northern Ireland (NI) have had to comply with The Police and Criminal Evidence (Northern Ireland) Order 1989 (PACE) and its respective Codes of Practice. RMG is a scheduled public authority for the purposes of conducting covert surveillance and for the purpose of the acquisition of communications data under RIPA.
- 1.4 RMG NI delivers on average 1.9 million mail items a day to around 785,629 addresses. This equates to around 2% of the National average. Reported losses of mail items in NI represent around 0.002% of delivered mail.
- 1.5 POL has 532 branches (4% of the national total) in NI. Royal Mail Group Ltd has 3,440 staff (2% of the national total), based in NI. This is comprised of around 3,200 in RML, 150 in POL and 90 in Parcel Force World Wide.
- 1.6 RMG maintains a security function that is responsible for investigating crime against its constituent businesses. The function is the successor to Post Office Security and Investigation Services, the Post Office Investigation Department and the Investigation Branch.



- 1.7 RMG investigators are bound by the requirements of legislation such as PACE and RIPA but do not have the powers of police Constables. As a result interviews of alleged offenders are carried out with their consent on a voluntary basis. Investigators at times seek the assistance of police officers for various elements of the investigation. There are 104 investigators spread across three territorial divisions but the establishment in NI for Royal Mail Letters (RML) is one team leader and three investigators. In addition, POL has one investigator based in NI and though Parcel Force has no local staff, investigations of cases in NI are conducted by staff based in England. When necessary investigators can move from region to region to provide support and this means that they have to be aware of the differences in legislation and context in each area. Royal Mail Security Risk Management has one security manager based in NI.
- 1.8 External crime such as Post Office robberies, burglaries, attacks on postal workers, thefts of delivery pouches and vehicles are investigated by the Police Service of Northern Ireland (PSNI) with support from each of the business unit security teams. Internal crimes such as theft from the post, accounting fraud, and intentional delay are investigated by the company. RMG applies a system of investigation trigger points detailing the incident type, category of investigation, procedure to be followed, and guidance on external police involvement.
- 1.9 In England and Wales (E & W) RMG investigators have access to the Police National Computer (PNC) to retrieve details of conviction details of employees for the purpose of any criminal investigation. In NI the same information had been sourced through the PSNI but the recent introduction of *Access NI*¹ should improve the system of retrieval of criminal records for RMG investigators.
- 1.10 RMG conducts its own English and Welsh prosecutions according to the Code for Crown Prosecutors. In Scotland completed investigation files are forwarded to the Procurator Fiscal's office and in NI completed investigation files are forwarded via the PSNI to the Public Prosecution Service (PPS). At the time of inspection fieldwork consultation with the PPS to enable RMG case files to be submitted directly to them was under way. A direct submission process would reduce the potential for delay in processing files.

¹ The system for the disclosure of an individual's criminal history established by the NI Office (NIO) as a result of the introduction in N. Ireland of Part V of the Police Act 1997.

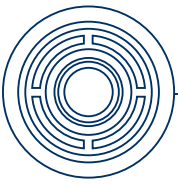
Oversight and Governance



- 2.1 The Board of Royal Mail Holdings plc is appointed by The Government which owns 100% shareholding. Monitoring of performance and development and agreement of strategic plans are overseen by the Board who report directly to the Shareholder Executive under the Minister for Employment Relations and Postal Affairs in the Department for Business, Enterprise and Regulatory Reform. Royal Mail Group plc Ltd. is the operating company, a wholly owned subsidiary of Royal Mail Holdings plc.
- 2.2 Regulation of RMG criminal investigation activities is provided by a number of organisations. RIPA empowered the OSC to provide oversight and inspection for source handling (CHIS) and covert surveillance whilst the IOCCO provides the same assurance for the acquisition and disclosure of communications data. Monitoring of usage of the PNC had been undertaken by PITO. However, this has been superseded by the National Police Improvement Agency (NPIA) which at the time of inspection had not yet audited RMG with regard to its use of the PNC.
- 2.3 Internally, RMG uses OSC methodology to conduct audits of CHIS and covert surveillance on an annual basis between each OSC inspection. Previous OSC reports have made positive comments about RMG as regards its surveillance operations and its performance in implementing OSC recommendations.
- 2.4 RMG is also regulated by PostCOMM and by PostWatch². RMG is required to *‘record all incidents of loss or theft of, damage to, or interference with Code Postal Packets in reasonable detail.’* RMG must report relevant incidents and prosecutions to PostCOMM on a quarterly basis and is obligated to analyse data *‘with a view to identifying any trends, patterns or other notable features (such as above average incident levels at certain premises).’*
- 2.5 RMG submits an Annual Report to both PostCOMM and PostWatch which includes:
- the number of Code Postal Packets³ lost, stolen, damaged or interfered with;
 - details of any trends, patterns or other notable features in relation to the incidence of loss or theft of, damage to, or interference with, Code Postal Packets; and

² The independent watchdog for postal services.

³ A Postal Packet conveyed pursuant to a licence.



- a statement of the measures that RMG intends to take to remedy any failures or patterns of failure to achieve the Mail Integrity Objectives and to reduce the numbers of Code Postal Packets lost, stolen, damaged or interfered with.

staff and any visiting investigators from elsewhere in the UK continue to operate under the correct legislation.

2.6 The RMG security function had been organised to devolve autonomy and accountability to business units. Royal Mail Letters, Post Office Ltd. and Parcel Force Worldwide each have a head of security responsible for managing crime risks and criminal investigation. The heads of security report to Directors in their respective business units and are also members of the Group Security Council. The Council is chaired by the Security Director and supports the effective management of crime risks across the group, to develop group-wide strategies and to monitor performance.

2.7 RMG operates under a clear and comprehensive investigation and prosecution policy which Inspectors found was well known by investigators and casework team members. The policy had last been reviewed in December 2007 and was scheduled to be reassessed again in November 2008. The policy had taken into account different jurisdictions, including NI. However, it refers exclusively to investigators operating in compliance with the PACE Act 1984 but not to the PACE (NI) Order 1989. There are only very slight differences but for complete accuracy it may be useful to refer in the policy to the PACE (NI) Order 1989 as well to ensure that NI

Partnership and Results



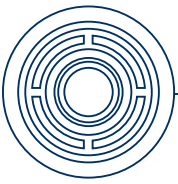
3.1 Externally the main partner is the PSNI but there are also links to HM Revenue and Customs (HMRC) and other external agencies including the Public Prosecution Service (PPS). Links with the PSNI are well established and generally are good with clear lines of demarcation as to where responsibility for investigations lies. In some cases when a crime involves internal and external elements, investigations are carried out by RMG investigators and passed to the PSNI once complete. In other cases the responsibility for investigation was shared appropriately.

3.2 Many cases requiring partnership work with the PSNI concern the use of the mail system to transport drugs. A Single Point of Contact (SPoC) arrangement is in place and there were very good links with the PSNI drugs units. However, personal contact played a big part in facilitating the effective flow of information between the organisations and recently much of this had been lost due to changes in personnel. Effective sharing of information to ensure comprehensive risk assessment prior to operations and ultimately successful outcomes is essential to many joint RMG/PSNI operations. It would be useful to

review the SPoC arrangement to take account of changing personnel, structures and processes.

Inspectors recommend that arrangements between RMG and the PSNI are reviewed to produce an agreed Memorandum of Understanding.

3.3 Internal partnerships are essential to enable the RMG investigative element to pursue its goals. There is good partner working between the investigative unit in NI and the casework teams based in Great Britain. Case files are subject to a standard handling process once investigations are initiated. Case file preparation is the responsibility of the allocated investigator and Inspectors found that a robust check-list system ensures files are complete before they are forwarded for quality checking. Inspectors examined a number of completed files and found them to be of high quality. Completed files are forwarded through the Investigation Team Manager (ITM) to a casework team based in Leeds. Good links with the casework team had been maintained through a series of formal meetings as well as informal contact regarding case file issues. The team provided feedback regarding case file quality to investigators and the ITM




and this had directly impacted on identified training needs and investigator development.

- 3.4 It is the responsibility of the casework team to check files for quality and assess the evidence presented using a comprehensive quality assurance system. Casework team members are not legally qualified. However, based on evidence presented in the case file and applying prosecution guidelines the team made recommendations whether or not a prosecution should be pursued. The file then passes to the RMG Personnel Director for NI for organisational approval to prosecute. Once approval is given files are passed to the Investigation Manager who forwards them to the relevant PSNI District Commander. Finally, the PSNI forward the file to the PPS for a prosecution decision.
- 3.5 This system is more complex than it needs to be. Passing case files to the PSNI prior to submitting them to the PPS is an unnecessary step. However, Inspectors found that within RMG case handling there had been little delay. Targets and case milestones were applied robustly and performance against those targets was good. Some cases had suffered delay after being passed to the PSNI and Inspectors found that during the past year four files had been mislaid resulting in cases being out of time.
- 3.6 RMG prosecutes its own cases in E & W through a retained criminal law team which is positioned independently from the RMG Crime Investigations Function. This

arrangement enables more direct contact with courts and more direct control over the passage of cases through the prosecution system. Results of cases in E & W are reported directly by the RMG prosecution team so that cases are finalised immediately. This is not the case in NI. There is no direct contact with courts or with prosecutors and the casework team had experienced protracted delay in finalising cases so that they could be reported promptly to the regulator. RMG has a legal obligation to report relevant issues quarterly to PostCOMM and delay in finalising cases affects performance figures and other data reported to the regulator. At the time of fieldwork effort was being made to establish whether RMG could submit case files direct to the PPS. This would be a more direct system and would lessen the risk of protracted delay. **To improve efficiency and reduce delay Inspectors recommend that RMG establishes a more direct method of presenting their cases for a prosecution decision.**

- 3.7 Inspectors interviewed members of the casework team in Leeds and examined case notes and statistical information regarding files submitted from NI. The present system had been in operation for two years and Inspectors found that the quality assurance process was an excellent example of good practice in action. Investigators spoken to recognised the system as thorough. However, when it was first introduced it had been regarded as overly exacting. Investigators and managers



recognised that quality had been improved and all took pride in achieving high quality scores. The scoring system was sufficiently sophisticated to highlight areas for development, for example, conduct of taped interviews, and these were addressed by focused further training for investigators.

3.8 Case files were of high quality and had not been subject to unnecessary delay whilst being investigated by RMG staff. Casework staff and managers said that files submitted by the team of investigators in NI compared favourably with those from other areas. However, across the two jurisdictions, two different systems of case handling had produced some differences in case outcomes. Case numbers in NI had been low and therefore comparisons with case outcomes in E & W where there had been much higher numbers of cases should be regarded with caution. Nevertheless, the percentage of cases dealt with by way of caution is consistently higher in NI than in E & W. Table 1 (see page 10) shows the figures dealt with by way of caution during 2005-06; 2006-07; and the total to the end of December 2007 for the year 2007-08. The figures for cases dealt with in 2006-07 show that 16% of total cases dealt in E & W were by way of caution as compared with 33% in NI for the same period. Complete figures for 2007-08 were not available at the time of fieldwork but up to the end of December 2007, cautions in NI were running at 71% compared to 21% for E & W.

3.9 The comparative scale of cases dealt with by the small investigative team in Northern Ireland is illustrated in Table 2 (see page 11). Figures for the year 2007-08 refer to those recorded up to the end of December 2007. In 2006-07 the percentage of crime incidents reported that had resulted in investigations in NI was 25% compared with a figure of 18.08% for the rest of the UK. In the same year the percentage of investigations raised that resulted in interviews under caution being conducted were 58.3% for E & W compared with 67.3% for NI.

3.10 All RMG case files pass through the same quality assurance process up to the prosecution decision stage. In E & W the prosecution advice and direction is provided by the RMG criminal law team which is positioned independently from the RMG Crime Investigations Function applying Crown Prosecution Service (CPS) guidelines. In NI the decision is taken by the PPS using similar guidelines. However, the overly complex case submission process had meant that reasons for decisions made by prosecutors had not been made available to the RMG case investigators. In the absence of explanation by the prosecutor as to why a caution or no prosecution was directed (as opposed to prosecution) RMG had been unable to establish detailed reasons for apparent anomalies in case outcomes between the two different jurisdictions. The CJI report 'Public Prosecution Service Northern Ireland' published in 2007

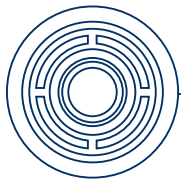


Table 1 Cases dealt with by way of caution

Count of Jurisdiction		Outcome/Sentence																													
		2005-06					2005-06 Total					2006-07					2006-07 Total					2007-08					2007-08 Total				
		Caution	Community Punishment Order	Custodial	Other	Suspended	%	Caution	Community Punishment Order	Custodial	Other	Suspended	%	Caution	Community Punishment Order	Custodial	Other	Suspended	%	Caution	Community Punishment Order	Custodial	Other	Suspended	%						
England & Wales	Legal Primary Offence	2	1	3	2		8	25%	3	2	1	1	7	43%	1	3	3	2	9	11%											
	Assault			1			1		4	3	1	1	9		1			2	8												
	Burglary/Robbery			2	3		6	17%	6	3	1	6	19	32%	13	2	3	1	19	68%											
	Criminal Damage	3	8	17	2	4	34	9%	4	9	4	9	34	12%	7	6	13	4	31	23%											
	Fraud								1				1	100%					1												
	Harrasment/Bullying								14	10	5	9	2	40	12	7	4	9	6	38	32%										
	Other	2	1	2			5	40%	1	2	1	1	4	25%	1	3	3	4	4	25%											
	Pecuniary Advantage	52	33	2	6	8	101	51%	39	39	8	12	6	104	48	17	4	7	10	86	56%										
	Postal Service Act - Intentional Delay																														
	Postal Service Act - Other	9	115	112	21	33	290	3%	7	61	82	13	78	241	15	73	72	17	95	272	6%										
	Theft of Post	3	6	8	4	3	24	13%	4	2	15	5	1	27	3	5	2	1	1	12	25%										
	Theft off/From Pouch	3	1	1	1	1	6	50%	2	2	4	4	6	6	3	1	1	2	6	6	50%										
	Theft off/From Vehicles	81	174	148	49	55	507	16%	79	132	121	61	99	492	103	114	108	41	123	489	21%										
	England & Wales Total																														
Northern Ireland	Assault		1				1																								
	Criminal Damage				2		2													2			1	3	67%						
	Other			1			1		1				1	100%																	
	Postal Service Act - Intentional Delay	2		1	1	1	4	50%	1				1	100%	5		1							6	83%						
	Theft of Post	4	1	1	1	4	11	36%	1			2	1	4	5								3	8	63%						
Theft off/From Vehicles					1	1																									
Northern Ireland Total	6	2	2	5	5	20	30%	2	1	1	2	1	6	12					12			1	4	17	71%						
Scotland	Postal Service Act - Intentional Delay		3		2		5		3	1	4		8							4		2		6							
	Theft of Post		20	1	12		33		11	3	9		23							23		3	11		37						
	Theft off/From Pouch																					1	1		2						
Scotland Total		23	1	14		38	0%	14	4	13		31	0%	27	4	14			27	4	14		45	0%							

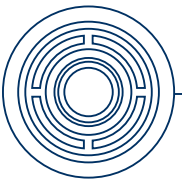
Table 2 RMG Security Statistics

Year	Royal Mail Letters			Parcelforce			Post Office		
	2005-'06	2006-'07	2007-'08	2005-'06	2006-'07	2007-'08	2005-'06	2006-'07	2007-'08
Crime incidents reported (All)	8150	6993	4475	345	482	308	1633	2923	1957
Crime incidents reported (NI)	163	158	95	5	3	3	48	195	131
Investigations raised (All)	1617	1312	924	37	58	32	716	535	228
Investigations raised (NI only)	49	51	24	0	0	0	19	30	10
Interviewed under caution (All)	944	832	519	22	52	32	262	172	105
Interviewed under caution (NI only)	33	27	24	0	0	0	3	14	12

recommends that, 'Directing lawyers should explain fully their reasoning to the agency in cases where they direct no prosecution or where their decision is different from that recommended by the investigator.' Because of the third-party submission process through the PSNI the PPS had been unable to clearly distinguish Royal Mail cases. If RMG pursues direct submission of its case files to the PPS then it would follow that prosecutors would be better enabled to provide reasons for decisions directly to RMG as the originating agency rather than operating indirectly through the PSNI.

by caution. In E & W applications for costs are routinely made by prosecutors on behalf of RMG and awarded as appropriate by the courts. There had been many less cases in NI but of those a higher percentage had been dealt with by way of caution and therefore costs had not been recoverable. Costs awarded in all cases prosecuted in E & W in 2006-07 amounted to £110,311. In the same period in NI, nil costs were awarded.

- 3.11 The present indirect submission system hampers proper monitoring of case progression and outcomes. Case outcomes are important to RMG as there are financial consequences to a low rate of successful prosecutions. Recovery of costs and compensation is possible if cases are dealt with through the courts whilst costs are not recoverable in cases dealt with



Equality, Development and Learning



- 4.1 RMG is subject to and operates under equality legislation. It would not be valid to draw conclusions regarding equality in the workforce from such a small team of investigators but it was broadly representative of the population in general. In RMG internal incidents of harassment and bullying are investigated independently of the Criminal Investigation function by appropriately trained harassment investigators. At the time of fieldwork no such incidents had been reported for investigation in NI.
- 4.2 Individual performance of investigators had been monitored using performance scorecards and monthly feedback had been provided. Areas for development had been linked through from performance measures to focused training and investigators had also highlighted areas for development through the Performance and Learning Management System (PaLMS). Team performance is also measured and monitored using a scorecard system against agreed Key Performance Indicators (KPIs).
- 4.3 RMG had conducted surveys of staff opinions annually through a survey called 'Have Your Say'. Results from the survey had been analysed and had led to the development of organisational Action Plans being taken forward. Staff had been involved in the deployment and monitoring of Action Plans and had spoken positively to Inspectors about how RMG had sought to properly consult with staff at the service delivery end of the business.
- 4.4 There had not been a high turnover of staff in the investigations side of the business in NI. Most investigators were very experienced and all had attended structured investigative training. Investigators had completed an 'Introduction to Investigation Programme' involving distance learning, practical elements (including court procedure), and on-the-job training. Investigators had been assessed whilst on the programme and to be successfully confirmed had to be awarded a pass. Some investigators had also attended refresher programmes and focused training identified from their development plans. Surveillance training had been identified as an organisational need and all the investigators had been scheduled to attend surveillance training later in 2008. All staff spoken to by Inspectors had attended a generic RMG Diversity course.




4.5 Most training had been delivered in-house by the RMG training unit based in England. However, some training had been delivered by the police. Investigative training had been accredited to NVQ level. Training had been linked to personal and organisational need. The quality assurance system administered by the casework team in Leeds had contributed to both personal and organisational development by identifying areas for development through a structured and comprehensive scoring system. At the time of fieldwork Inspectors were told that a review of this system was being considered. Given that case files and the quality of investigations had been improved, investigators had been developed, and that there had been minimal turn-over of NI staff a review of this system would be timely. The system had been in operation for two years and Inspectors believe that the adoption of a less rigid system based on dip-sampling rather than detailed assessment of every case file submitted would now be adequate to maintain quality and identify training needs. **Inspectors recommend that the quality assurance system for investigations should be revised to adopt dip-sampling of case files as the default method of maintaining quality.**

4.6 Typical cases dealt with by RML investigators included theft of post and criminal damage. The POL investigator typically dealt with offences committed by PO employees against customer accounts. These investigations had been more complex in nature and had often

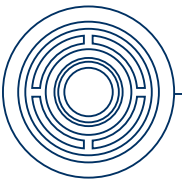
involved elements of fraudulent behaviour or false accounting. Because the offences had been committed in NI and were subject to different submission processes and legislation, the RMG criminal law team had been unable to either provide advice nor decide on prosecution regarding these cases. The POL investigator had access to advice regarding employment legislation if required. For POL criminal cases in NI the internal prosecution decision rests with the Head of Security. Files had then been forwarded to the PSNI for onward transmission to the PPS. As previously raised in the report this is an overly complex submission system which increases the risk of delay. It would be helpful if cases submitted in NI by the POL investigator went through the same, less complex process as recommended for RML cases. **Inspectors recommend that to improve efficiency and reduce the risk of delay that Post Office Ltd cases are submitted by a more direct method as recommended for RML cases.**

4.7 There was only one POL investigator for NI but at the time of fieldwork two other investigators based in England and Scotland were being trained to deal with NI cases to improve resilience and to provide support. Inspectors found that there was capacity within the existing RMG investigators in NI to provide support and cover. There had been cases when the POL investigator had assisted with RML investigations and this had been reciprocated informally. **To improve resilience and**



support Inspectors recommend that RMG security formalises a flexible approach to investigations so that local investigative staff can be shared across its business areas in NI in response to demand.

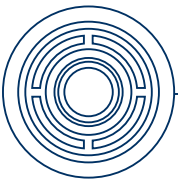
- 4.8 Inspectors found that POL cases had been generally more complex and had required several tape recorded interviews. Case files examined had contained full tape transcripts as opposed to tape summaries that had been found in RML case files. The preparation of full tape transcripts had been done by the POL investigator and had been time consuming; impacting on time spent actually investigating. Inspectors were told that the preparation of full transcripts had been under instruction from the PPS. The routine preparation of full tape transcripts for every POL case is a costly exercise and should be reviewed in consultation with the PPS. In similar cases prepared by other bodies, such as the PSNI, full transcripts are not routinely required by the PPS. **Inspectors recommend that the routine preparation of full tape recorded interview transcripts should be reviewed in consultation with the PPS.**



Section



Appendices



Appendix 1: Methodology

This Inspection commenced in November 2007 and consisted of the following main elements:


- Research and Organisational self-assessment
- Fieldwork
- Report refinement

Fieldwork

Visits to RMG took place during February and March 2008. Interviews were conducted with relevant staff in all areas concerned with the investigative process. All members of the investigative team in NI were interviewed together with relevant supervisors. A selection of case files was also examined. All members of the casework team based in Leeds having any responsibility for NI cases were also consulted and the quality assurance structures and statistical monitoring functions were examined.

Report refinement

Draft reports were shared with RMG for factual accuracy checking prior to sharing the report with interested organisations.



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