

Interim Disclosure Statement

27 May 2022

THE POST OFFICE HORIZON IT INQUIRY

Interim Disclosure Statement on behalf of Post Office Limited

1. I, Benjamin Andrew Foat of Finsbury Dials, 20 Finsbury St, London EC2Y 9AQ, am Group General Counsel of Post Office Limited ("**POL**").

A. INTRODUCTION

2. This interim disclosure statement has been prepared in response to the request made by the Inquiry in its letter dated 13 May 2022 for the provision of an interim disclosure statement in relation to all of POL's disclosure to date, in accordance with paragraph 18 of the Inquiry's Protocol on the Disclosure of Documents. In that letter, the Inquiry also requested an explanation for the discrepancy between the number of documents produced by POL to the Inquiry and the number set out in a statement made by POL's Chief Executive Officer, Nick Read, in an article that was published in the Scotsman newspaper on 8 May 2022.

B. THE NUMBER OF DOCUMENTS PRODUCED BY POL

3. Dealing first with the discrepancy, the statement in the article that POL has provided 3 million documents to the Inquiry is incorrect. I am informed by the solicitors representing POL in the Inquiry, Herbert Smith Freehills ("**HSF**"), that the approximate number of documents that has been provided to the Inquiry as at the date of this statement is 39,000. I am aware from Mr Read that he has written to the Inquiry to apologise for the discrepancy and to explain the circumstances in which it arose.

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4. The discrepancy arose in the following circumstances, which have been established by enquiries made by the POL in-house legal team of Mr Read, the POL communications team and POL's external communications advisors, TB Cardew. In advance of the Human Impact Hearings in Glasgow on 11 and 12 May 2022, the POL communications team obtained an opportunity for Mr Read to explain briefly in The Scotsman, amongst other things, how POL wishes to assist the work of the Inquiry. TB Cardew produced a draft article, which was then reviewed by the POL communications team and by Mr Read. The draft article included the reference to 3 million documents. The number was included by TB Cardew because they had heard reference to it in a meeting but was not subsequently checked despite Mr Read asking for it to be. The erroneous number therefore appeared in the article.
5. In the future, I have re-emphasised that any formal communication in the media relating to the Inquiry will first be checked with POL's in-house legal team and approved by POL's Inquiry Director, who are familiar with our work in relation to the Inquiry.

C. OVERVIEW OF INTERIM DISCLOSURE STATEMENT

6. I turn now to the Inquiry's request for a disclosure statement.
7. I am the appropriate person to make the disclosure statement because following the board's appointment of HSF I am ultimately responsible for instructing HSF in respect of POL's response to each of the eleven requests made to POL by the Inquiry under Rule 9 of the Inquiry Rules 2006 ("**Rule 9 Requests**"), based on the instructions that I and POL's in-house lawyers under the supervision of POL's Inquiry Director receive from our colleagues in the business and ultimately the POL board.
8. This statement, including the Annex, constitutes POL's interim disclosure statement in accordance with paragraph 18 of the Inquiry's Protocol on the Disclosure of

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Documents. In this statement I set out POL's general approach to searches and review of documents when responding to Rule 9 Requests received from the Inquiry to date, including the main repositories, general limitations on searches of which POL is aware and other relevant background. The Annex sets out POL's searches and reviews of documents in respect of the requests made by the Inquiry of POL before the Inquiry was on a statutory footing and each of the Inquiry's eleven Rule 9 Requests.

9. In this statement I address the following topics:
 - a. The origins and ownership of POL;
 - b. POL's retention policy and the document preservation holds in place;
 - c. POL's main repositories of electronic communications;
 - d. POL's main repositories of electronic documents;
 - e. POL's main repositories of hardcopy documents;
 - f. The databases of POL documents hosted on Relativity by KPMG, who are POL's e-discovery provider;
 - g. POL's approach to encrypted files and the application of redactions for privilege;
 - h. POL's control of documents, and categories of documents that are no longer within POL's control; and
 - i. The reasonableness of POL's searches.
10. In this statement I also refer:
 - a. to steps and/or decisions taken by POL in connection with the Rule 9 Requests including with the assistance of HSF (and POL's other legal

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representatives). POL's communications with HSF (and other legal representatives) were and remain by their nature privileged. For the avoidance of doubt, any reference to discussions should not be taken as a waiver of that privilege, whether expressly or impliedly.

- b. to steps taken on behalf of POL by HSF and POL's other legal representatives in connection with the Rule 9 Requests. For the avoidance of doubt, any reference to steps taken by HSF and POL's other legal representatives should not be taken as a waiver of privilege, whether expressly or impliedly.

- 11. Where I refer to my belief and recollection, these beliefs and recollections are based on the information provided to me by colleagues at POL, by HSF and by others that have assisted POL in providing disclosure.

D. DEFINED TERMS

- 12. In this statement, I have used a number of acronyms and defined terms. I have set out a definition of each, as I have introduced them. However, for convenience, I also set out the definitions of these acronyms and definitions below:

EFC	E-Filing Cabinet
Horizon	The Horizon IT System
HSF	Herbert Smith Freehills LLP
Inquiry	The Horizon IT Inquiry
NAS Drive	Network Attached Storage Drive

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POL Post Office Limited

RMG Royal Mail Group Limited

Rule 9 Request Requests made to POL by the Inquiry under Rule 9 of the
Inquiry Rules 2006

E. ORIGINS OF POST OFFICE LIMITED

13. I set out below a brief explanation of the origins of POL, which are relevant to understanding how documents are held by POL.

Post Office Limited as a legal entity

14. The Post Office Act 1969 established the Post Office as a statutory corporation, replacing the General Post Office. In 1986, a restructuring took place in which the operations of the Post Office were reorganised into three separate businesses: Royal Mail Letters, Royal Mail Parcels and Post Office Counters. Post Office Counters was incorporated as a limited company (Post Office Counters Limited) and subsidiary of the Post Office in 1987.
15. In March 2001, the shareholding of Post Office Counters Limited was transferred to Consignia plc, a public limited company ultimately owned by the Department of Trade and Industry (through its holding company Consignia Holdings plc), as part of restructuring effected under the Postal Services Act 2000. Post Office Counters Limited was renamed Post Office Limited in October 2001, while Consignia plc was renamed Royal Mail Group plc in November 2002 (and Consignia Holdings plc was renamed Royal Mail Holdings plc at the same time). Royal Mail Group plc was renamed Royal Mail Group Limited ("**RMG**") in March 2007.

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16. Following the Postal Services Act 2011, POL and RMG formally separated on 1 April 2012 (the "**Separation**"), with POL's shareholding transferred to Royal Mail Holdings plc. In September 2013, Royal Mail Holdings plc changed names to Postal Services Holding Company plc, which became Postal Services Holding Company Limited in December 2013. In June 2017, the shareholding in POL was transferred to the Secretary of State for Business, Energy and Industrial Strategy.

F. DOCUMENT PRESERVATION

17. Historically, I understand that POL had a seven year retention policy in relation to documents and records. In late 2014, data retention instructions were sent to relevant parts of the business as well as a number of third parties (including Cartwright King and Fujitsu) in contemplation of litigation. Subsequent document preservation notices have been issued in connection with the Criminal Appeal proceedings, malicious prosecution proceedings, the Employment Tribunal proceedings and the Inquiry once it moved to a statutory footing.
18. In order to ensure that it continued to retain documents and other materials which were relevant to the Group Litigation, I understand that POL arranged for copies of the data held on its file servers (totalling approximately 9.5 TB of compressed zip files) to be copied and placed onto a separate Network Attached Storage ("**NAS**") Drive in or around 2017.

G. ELECTRONIC COMMUNICATIONS

19. Prior to 2012, I understand that POL's provider of email servers and software was Lotus Notes. Following the Separation, POL began to use Microsoft Exchange instead of Lotus Notes. At the same time, POL began to use an email archiving system called Proofpoint. Since the beginning of 2016 POL has used Mimecast as

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its email archiving system. The emails that had previously been stored in Proofpoint were transferred into Mimecast.

20. I understand that there are a number of limitations to the email data that POL possesses, including:

- a. Only those who were identified as being current POL employees at the time of the Separation (i.e. those employed by POL and who continued to be employed by POL thereafter) were transferred across to POL. Accordingly, POL does not hold copies of email data in respect of those employees who left the business prior to or at the time of the Separation.
- b. At the time of the Proofpoint/Mimecast migration, only emails sent to or from a postoffice.co.uk email account were migrated, despite POL employees having access to and being able to use royalmail.com email accounts. The consequence of this is that POL did not receive emails solely between royalmail.com email accounts, even if those emails involved POL employees. Furthermore, the migration from Proofpoint to Mimecast will not have captured any deleted email data.

21. I also understand that there are a number of practical challenges associated with searching for and exporting email data from Mimecast, including:

- a. Mimecast only permits up to five active exports at a particular time. Export results are divided into 2GB files, each of which needs to be downloaded separately.
- b. Exports only remain available in Mimecast for a period of 15 days, following which it is necessary to re-run the underlying searches.

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- c. The Mimecast search functionality is more limited than the search functionality available on e-discovery platforms. Accordingly, in order to conduct meaningful searches across emails archived on Mimecast, it would first be necessary to export emails onto a separate e-discovery platform.
22. In view of these challenges, POL initially focused on harvesting email data for the purpose of the Inquiry from custodians who were considered to be most likely to hold documents relevant to a particular Rule 9 Request. That email data has then been exported to a "**Processing Database**". Where it is considered that a custodian's email data may contain documents responsive to a Rule 9 Request, searches are then carried out over the mailbox in the Processing Database, with documents responsive to searches then transferred to POL's "**Inquiry Database**" for review (these databases are explained in further detail below). In addition, I understand that certain email data had already been collated for certain custodians including in the contexts of the Group Litigation and the Criminal Appeal proceedings. Where a particular mailbox has been searched for the purposes of responding to a Rule 9 Request, this has been identified in the Annex.

H. ELECTRONIC DOCUMENTS

SharePoint, Teams and other shared drives

23. Various POL teams (including Company Secretariat, Legal and the Security teams) have had access to and saved documents on SharePoint or Teams sites and other shared drives. I understand that these SharePoint and Teams sites were only introduced following the Separation, although it is possible that historical documents may have been saved or subsequently transferred onto these drives. Where a particular SharePoint site or shared drive has been harvested or searched for the purposes of responding to a Rule 9 Request, this has been identified in the Annex.

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E-Filing Cabinets

24. Prior to the introduction of SharePoint in 2012, I understand that electronic documents were saved in 'E-Filing Cabinets' ("**EFC**") within Lotus Notes. Although an incomplete copy of the EFC is kept on the "**GLO Database**", POL is currently working to determine the most complete copy of the EFC to which it has access in order to ensure that no documents relevant to previous Rule 9 Requests have been missed and that the most complete copy is used where necessary for future searches.

Horizon Data

25. Transaction data (recording each transaction processed via Horizon) and event data (recording Horizon 'events' such as log-in attempts) is maintained by Fujitsu in central data centres. Data is normally held for a period of seven years. However, in October 2014, POL instructed Fujitsu to suspend its document deletion policy. I understand that Fujitsu therefore holds transaction and event data from October 2007.

Custodian laptops

26. Data from the hard drives and laptops of certain custodians have been harvested, including for individuals relevant in the context of the Criminal Appeal proceedings.

Contract repositories

27. In 2019, POL introduced a new web-based eProcurement platform for its employees to manage and store their contracts on. Prior to its introduction, I understand that third-party contracts were expected to be uploaded onto a system provided by BravoSolution UK Limited, for which a contract was signed by POL in April 2016. I am not aware of a central repository of contracts existing at POL prior to the Bravo

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system, although it is possible that historical contracts (including those legacy contracts that POL obtained from RMG following the Separation) were uploaded to the Bravo system when it was introduced.

Management tools and databases

28. POL uses and has used a number of management tools and databases which may be of relevance to the Inquiry. These include:

- a. POLSAP / Core Finance: A database containing financial information and accounting ledgers, in use since 2005. From September 2014, certain Post Office teams transferred from POLSAP to Core Finance.
- b. Credence: A management information tool providing inter alia the value, dates and times of Horizon transactions.
- c. HORice: A tool used by various POL teams (including the Security Team) during investigations.
- d. Remedy / Dynamics: Software used for logging calls made to the National Business Support Centre in the period from 2000 – 2014 (Remedy) and 2014 – present (Dynamics).
- e. iMAP: A database containing branch information used by the Network Design and Analysis team.
- f. Network Reinvention Database: A database containing the dates of service of Post Office agents.

I. HARD COPY DOCUMENTS

Postal museum

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29. The Postal Museum holds a range of historical POL documents, including (but not limited to) business and administrative records covering the day-to-day running of POL, minutes of the meetings of POL's Board which pre-date Separation and hard-copy branch files. Certain of the documents held in the Postal Museum pre-date the Separation, and are held by the Postal Museum on behalf of or jointly with RMG.

Oasis

30. Around 70,000 boxes and 30,000 files of archived hardcopy POL documents are held on behalf of POL by Oasis Group ("**Oasis**"), an offsite storage provider. POL's documents are primarily held at Oasis' Winchester site. These boxes comprise a wide range of documents including (but not limited to) individual branch records, HR records, audit files, and public consultation documents. Although the vast majority of the boxes and files are indexed, these indices contain only high level descriptions of the contents of the boxes and files, and I understand that a number of boxes and files are misdescribed to a degree. POL is also aware of some branch files which were believed to have been archived with Oasis but are in fact missing, and may have been lost in the transfer to Oasis.
31. In addition, POL has recently indexed and scanned around 5,000 boxes and files that were previously unindexed or not sufficiently indexed for the content to be identifiable. POL is in the process of arranging for these to be reviewed to consider whether any of the materials in them are of potential relevance to previous or future Rule 9 Requests. Any identified as relevant to previous Rule 9 Requests will be disclosed to the Inquiry. Where POL has carried out searches over the indices and/or reviewed documents stored at Oasis for the purposes of a particular Rule 9 Request, this is set out in the Annex.

Criminal case files

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32. Various hard copy materials have been identified and collated as part of the reviews undertaken in the context of the Criminal Appeal proceedings. These include Hard copy case files consisting predominantly of 'Green Jackets' (investigation files of the POL Security Team, 'Buff' files (POL internal prosecution files), 'Orange' files derived from Royal Mail and Cartwright King and 'Red' files (financial investigation files); as well as various CDs, tapes and videos, which I understand consist mainly of recordings of cautioned interviews.

Back office locations

33. During the Group Litigation and Criminal Appeal proceedings, POL identified a number of administrative offices and sites that contain separate stores of hard copy documents, and checked these for relevance to those proceedings. Where certain stores contained documents that may have been relevant to those proceedings, they were scanned and uploaded to the GLO Database and CCRC Database respectively (explained in further detail below) for review. POL is considering whether any of the documents that were not previously scanned may be of relevance to the Inquiry. However, POL has been unable to locate indices of the remaining hard copy documents stored at each site. POL is currently in the process of determining the contents of these hard copy documents and arranging for them to be reviewed. Any identified as relevant to previous Rule 9 Requests will be disclosed to the Inquiry.

J. RELATIVITY DATABASES

34. The above categories and repositories of documents have to some extent been searched and harvested previously for litigation purposes, including in the context of the Group Litigation, the Criminal Appeals and the Employment Tribunal proceedings, *Baker and Others v Post Office Limited*. A number of different

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databases of POL documents collated for various purposes are currently hosted on a single Relativity platform by KPMG to allow for documents to be more easily transferred between databases where necessary. These include:

- a. The GLO Database: this contains materials collated to allow for searches and reviews to be conducted for the purposes of disclosure in the Group Litigation proceedings. I understand that this database was initially hosted by Consilio on behalf of Womble Bond Dickinson, POL's original legal advisers in respect of the Group Litigation proceedings, before being transferred to KPMG. KPMG have carried out a number of checks and validation steps to provide assurance that the database was successfully transferred. The GLO Database contains in excess of 20 million documents.
- b. The CCRC Database: this contains materials collated to allow for searches and reviews to be conducted for the purposes of disclosure in the Criminal Appeals proceedings. This database was initially hosted by Consilio on behalf of Peters and Peters, POL's legal advisers in respect of the Criminal Appeals proceedings. KPMG carried out a number of checks and validation steps to provide assurance that the database was successfully transferred. The CCRC Database contains in excess of 4 million documents.
- c. The Employment Tribunal Database: this contains materials collated to allow for searches and reviews to be conducted for the purposes of disclosure in the Employment Tribunal proceedings. This database was initially hosted by Consilio on behalf of Womble Bond Dickinson, one of POL's legal advisers in respect of the Employment Tribunal proceedings, before being transferred to KPMG. KPMG carried out a number of checks and validation steps to

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provide assurance that the database was successfully transferred. The Employment Tribunal Database contains in excess of 4 million documents.

- d. The HSF Database: this contains materials provided to HSF during the course of separate instructions. It contains almost 500,000 documents, including agendas, minutes and papers of the POL Board and sub-committees of the Board, audit reports, emails and laptop copies of certain custodians, and data extracted from certain SharePoint sites (including those used by the Legal and Security teams). This database was initially hosted by HSF before being transferred to KPMG.
- e. The Processing Database: a holding database of certain email mailboxes harvested to allow for searches to be carried out in connection with the Inquiry. Any documents contained in the Processing Database that are responsive to particular Inquiry-related searches are transferred to the Inquiry Database for review. The Processing Database currently contains over 8 million documents.
- f. The Inquiry Database: this contains materials collated to allow for searches and reviews to be conducted for the purposes of disclosure to the Inquiry. This includes documents harvested from external sources (including data harvested and provided by third party law firms, Oasis and the Postal Museum) and documents identified within the other databases listed above. POL has sought to consolidate material potentially relevant to previous Rule 9 Requests on this database to improve the efficacy and coverage of its searches. It currently contains almost 1.5 million documents.

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K. ENCRYPTION, PRIVILEGE AND REDACTIONS

35. Approximately 50,000 documents across the GLO, CCRC, Processing and Inquiry Databases are subject to password encryption and, at present, cannot be opened. Accordingly, the contents of such documents would not be caught by keyword searches. POL is in the process of arranging for software to be used to attempt to gain access to such documents. To the extent that any documents are accessed and identified which are responsive to previous Rule 9 Requests, these will be provided to the Inquiry.
36. When reviewing documents for disclosure to the Inquiry, redactions have been applied to part privileged material to the extent information falls outside the parameters of POL's approach to the waiver of privilege set out in its note dated 15 November 2021.
37. Where documents are wholly privileged, or where no information relevant to the Inquiry remains once redactions have been applied to part privileged material, those documents have not been disclosed.

L. CONTROL

38. POL has only searched for and disclosed those relevant documents within its control. A large number of documents are held on POL's behalf by its former and current advisers. POL has asked those advisers who are likely to hold documents potentially relevant to the Inquiry's terms of reference on behalf of POL to provide copies of these documents to POL. Where documents have been obtained from an adviser for the purposes of responding to a particular Rule 9 Request, this is set out in the Annex.
39. There are documents in the categories listed below that are no longer in POL's control:

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- a. Original and copy correspondence, memoranda and other documents which have been lost or destroyed in the ordinary course of business which cannot now be traced or recovered.
- b. Any pre-Separation materials that were not transferred to POL during the Separation.

M. REASONABLENESS OF SEARCHES

40. To the best of my knowledge and belief, the searches and reviews that POL has conducted (or its advisers have conducted on its behalf) to locate and provide the Inquiry with the information that it has requested in each of its Rule 9 Requests to date have been reasonable in all the circumstances.

Statement of truth

I believe the content of this statement to be true.

Signed: _____

GRO

Dated: _____

27/05/2022

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ANNEX TO INTERIM DISCLOSURE STATEMENT

1. INTRODUCTION

- 1.1 The purpose of this Annex is to provide an overview of the steps that POL has taken to identify and produce to the Inquiry documents responsive to the requests made by the Inquiry when on a non-statutory footing and each of the eleven Rule 9 Requests issued by the Inquiry to date, and a description of the documents that have been produced in response to each request.
- 1.2 A detailed description of the approach that POL has adopted in responding to the Inquiry's requests is set out in the following paragraphs.

2. RULE 9 REQUEST NO. 1 (17 AUGUST 2021) – HSS WITNESS STATEMENT

- 2.1 By its Request No. 1, the Inquiry requested that POL produce a witness statement providing various information in relation to the Historic Shortfall Scheme (the "HSS").
- 2.2 POL produced a witness statement (provided by Nick Read) in response to this request on 31 August 2021. No additional / supporting documents were requested by (or produced to) the Inquiry.

3. RULE 9 REQUEST NO. 2 (9 SEPTEMBER 2021) – RE-DISCLOSURE OF DOCUMENTS

- 3.1 By its Request No. 2, the Inquiry sought, amongst other things, the provision of:
- 3.1.1 unredacted copies of all documents which POL had previously provided to the Inquiry in **redacted** form prior to its conversion onto a statutory footing (request 2).
- 3.1.2 all documents listed in POL's Artefact Register, to the extent that these documents have not already been produced to the Inquiry (request 3).
- 3.2 Prior to its conversion onto a statutory footing, POL arranged for a total of **441** documents to be produced to the Inquiry. 396 of these documents were produced by POL in response to five separate "Batch Information Requests" received from the Inquiry, broken down as follows:
- 3.2.1 Batch Request 1 (23 October 2020): **275** documents
- 3.2.2 Batch Request 2 (20 November 2020): **15** documents
- 3.2.3 Batch Request 3 (18 December 2020): **26** documents
- 3.2.4 Batch Request 4 (29 January 2021): **4** documents
- 3.2.5 Batch Request 5 (26 March 2021): **66** documents
- 3.2.6 Batch Request 6 (11 June 2021): **10** documents
- 3.3 POL arranged for a further 11 documents to be produced to the Inquiry in response to the Call for Evidence on 23 February 2021. A further **34** documents were produced to the Inquiry in connection with the "Teach-In" sessions held on 29 April 2021.
- 3.4 In its initial response to Request No. 2 on 30 September 2021, POL produced to the Inquiry:

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- 3.4.1 unredacted copies of all documents that had previously been provided in redacted form, save for certain documents for which it considered third party consent would first be required.
- 3.4.2 all documents included in the Artefact Register to the extent that these had not previously been provided to the Inquiry, save for certain documents in respect of which it considered third party consent would first be required.
- 3.5 On 29 October 2021, having obtained the third party consents referred to in paragraph 3.4.1 above, POL produced to the Inquiry copies of the documents that had been withheld from the production on 30 September 2021.
- 3.6 Certain of the documents contained material that was subject to legal professional privilege and had accordingly been produced to the Inquiry in redacted form.
- 4. RULE 9 REQUEST NO. 3 (8 OCTOBER 2021) – GLO TRIAL BUNDLE AND DISCLOSURE LISTS IN HAMILTON PROCEEDINGS**
- 4.1 By its Request No. 3, the Inquiry sought production of the following documents:
 - 4.1.1 The full electronic trial bundle in *Bates and Ors v Post Office Limited* (Case No. HQ16X01238, hearing dates: 7, 8, 12, 13, 14, 15, 18, 20, 22 and 26 November 2018; 3, 4, 5, and 6 December 2018) (the "**Common Issues Trial Bundle**");
 - 4.1.2 The full electronic trial bundle in *Bates and Ors v Post Office Limited* (Case No. HQ16X01238, HQ17X02637 and HQ17X04248, hearing dates: 11, 12, 13, 14, 18, 19, 20, 21 and 27 March 2019; 3, 9 and 23 April 2019; 4, 5, 6, 7, 11, 13 and 14 June 2019; and 2 July 2019) (the "**Horizon Issues Trial Bundle**");
 - 4.1.3 A full list of disclosure provided by POL in *Bates and Ors v Post Office Limited* group litigation (the "**Group Litigation**"); and
 - 4.1.4 A full list of disclosure provided by POL in *R v Hamilton and Ors* [2019] EWCA Crim 21 and [2019] EWCA Crim 577.
- 4.2 On 29 October 2021, POL produced to the Inquiry documents responsive to the request, together with a copy of the production index.
- 4.3 POL obtained copies of the Common Issues and Horizon Issues Trial Bundles from Opus 2 International Limited, who provided e-Discovery services in the context of the Group Litigation and who continue to maintain electronic copies of the bundles.
- 4.4 POL obtained a list of the disclosure provided by POL in the Group Litigation from Womble Bond Dickinson ("**WBD**"), who represent POL in those proceedings. As explained in HSF's letters of 18 and 29 October 2021, POL's disclosure in the Group Litigation was provided in multiple stages and the list provided to the Inquiry was a composite list covering all of the stages.
- 4.5 POL obtained a list of the disclosure provided by POL in the *Hamilton* proceedings from the firm of solicitors which acted for POL in those proceedings, Peters & Peters.
- 5. RULE 9 REQUEST NO. 4 (3 NOVEMBER 2021) – BOARD AND SUB-COMMITTEE MINUTES RELATING**

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TO HORIZON

- 5.1 By its Request No. 4, the Inquiry sought production of all board minutes since 2000 which relate to the Horizon IT systems, including those which address any of the following matters:
- 5.1.1 issues relating to and arising from bugs, errors and defects;
 - 5.1.2 the impact of the Horizon IT system on sub-postmasters and sub-postmistresses; and
 - 5.1.3 the bringing of private prosecutions.
- 5.2 By its letter of 26 November 2021, the Inquiry confirmed that it considered sub-committee minutes to be within the scope of Request 4 and requested that POL therefore search for and provide responsive materials by no later than 3 January 2021.

Board Minutes

- 5.3 In order to respond to the request, POL sought to collate all minutes of the Post Office board in the period from 1 January 2000 to date. In this respect:
- 5.3.1 Minutes from 2012 onwards were obtained from POL's Company Secretary from the Company Secretary SharePoint.
 - 5.3.2 Pre-2012 minutes were previously obtained from the Postal Museum in the course of separate instructions that POL had provided to HSF (including, in respect of the period before regular meetings of the POL Board took place, the board minutes of the Statutory Corporation and Consignia Plc). In order to identify minutes of the dedicated POL Board (which started to meet regularly from May 2002), POL conducted searches across these materials for documents responsive to the following search: "POLB" **AND** "Minutes of the meeting" **AND** ("Post Office Limited" OR "Post Office Ltd"). POL also sought the assistance of the Postal Museum to ensure that it had as comprehensive a set of minutes as possible (which helped identify two further minutes).
- 5.4 Having identified and collated a universe of board minutes for the relevant period, POL then conducted keyword searches using the following terms to identify a narrower pool of potentially responsive documents for manual review:
- 5.4.1 Bates
 - 5.4.2 Convict*
 - 5.4.3 FJ
 - 5.4.4 FSL
 - 5.4.5 Fujitsu
 - 5.4.6 GLO
 - 5.4.7 Group Action
 - 5.4.8 Group Litigation

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- 5.4.9 Horizon
- 5.4.10 HNG
- 5.4.11 HZ
- 5.4.12 ICL
- 5.4.13 ICRMS
- 5.4.14 International Computers Limited
- 5.4.15 IT or Computer w/1 system
- 5.4.16 Mediation Scheme
- 5.4.17 POL IT
- 5.4.18 Postmaster litigation
- 5.4.19 Prosecut*
- 5.4.20 Sparrow
- 5.5 The POL Board met regularly from May 2002. In respect of the period from 2000 to 2002, at the request of the Inquiry in its letter of 26 November 2021, POL obtained the consent of RMG to produce minutes of the boards of Post Office Statutory Corporation and Consignia Plc to the Inquiry.
- 5.6 On 1 December 2021, POL produced to the Inquiry Board minutes responsive to Request 4, together with a copy of the production index. In total, POL disclosed **151** board minutes in response to this Request 4, including relevant minutes of the Post Office (Statutory Corporation) and Consignia PLC boards.

Sub-Committee Minutes

5.7 Sparrow and GLO Sub-committee minutes

- 5.7.1 POL has maintained complete sets of minutes of the Sparrow and GLO sub-committees, which are held by the POL Company Secretary. The Sparrow and GLO sub-committee minutes were manually reviewed in full and those minutes that are responsive to the request were produced to the Inquiry on 17 December 2021.

5.8 Other sub-committees listed in the Annex to HSF's 23 November letter

- 5.8.1 The Annex to HSF's letter of 23 November 2021 identified the following, additional sub-committees:
 - (A) Audit, Risk and Compliance Committee (formerly, the Risk and Compliance Committee)
 - (B) Health and Safety Committee
 - (C) Nominations Committee
 - (D) Remuneration Committee

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- (E) Annual & Interim Report Sub-Committee, 2011-2016
- (F) Eagle Sub-Committee (concerning the sale of Post Office Financial Services), 2011-2012
- (G) Mutualisation Committee, 2012-2013
- (H) Pensions Committee, 2012-2013
- (I) RMG Sister Company Sub-Committee, 2012
- (J) Financial Services Committee, 2014-2015
- (K) Sparrow Sub-Committee, 2014-2015
- (L) Funding Sub-Committee, 2017
- (M) GLO Sub-Committee (also referred to as the Postmaster Litigation Sub-Committee), 2018-2020
- (N) Panther Sub-Committee (concerning the proposed acquisition of a payments business), 2018
- (O) Credit Card Sub-Committee, 2019

5.8.2 All minutes of the above-listed sub-committees held on the Company Secretary SharePoint were collated and uploaded to KPMG's Relativity platform. Written resolutions were not considered to be minutes, and were not therefore harvested. The GLO and CCRC databases were also searched for "POLARC" (a unique reference which appears in each of the minutes of the meetings of the ARC Sub-Committee). However, no additional ARC minutes were identified.

5.8.3 POL then conducted keyword searches using the following terms to identify a narrower pool of potentially responsive documents for manual review.

- (A) Bates
- (B) Convict*
- (C) FSL
- (D) FJ
- (E) Fujitsu
- (F) GLO
- (G) Group Action
- (H) Group Litigation
- (I) Horizon
- (J) HNG*

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- (K) HZ
- (L) ICL
- (M) ICRMS
- (N) International Computers Limited
- (O) IT or Computer w/1 system
- (P) Mediation Scheme
- (Q) POL IT
- (R) Prosecut*
- (S) Postmaster litigation
- (T) Sparrow

5.9 Pre-2012 minutes

- 5.9.1 Prior to 2012, POL does not appear to have had an Audit, Risk and Compliance Committee. POL did however have a Risk and Compliance Committee ("**RCC**"), which appears to have been a board sub-committee. Searches for pre-2012 RCC meetings were first carried out on HSF's Relativity platform, with the following search terms: "*Risk and Compliance Committee*" **AND** "*Meeting Ref*".
- 5.9.2 POL also wrote to the Postal Museum to ask for assistance with identifying pre-2012 minutes of the Committees listed above. In its response, the Postal Museum indicated that it held a small number of copies of Health & Safety Committee minutes from around 2000 and some Pensions Committee minutes in hard copy. The Postal Museum indicated that copies of these minutes were not available and that they would have to be inspected in person. By that stage it had become apparent that none of the minutes of the Health & Safety Committee and Pensions Committee that had been located on the Company Secretary SharePoint were responsive to the request. It was therefore decided not to inspect the Health & Safety and Pensions Committee minutes held at the Postal Museum on the basis that they were unlikely relevant. The Postal Museum did not hold any additional RCC minutes.
- 5.9.3 In order to identify sub-committee minutes of the Post Office Statutory Corporation and Consignia Plc for the period from 2000 to May 2002, POL conducted a targeted search for the term "minutes" across the unified document title HSF's Relativity platform, with a date filter of 01/01/2000 – 24/05/2002 (the date of the first regular POL board meeting). Responsive documents were reviewed for relevance. POL then used text common to each of the minutes identified to try to identify further Post Office Audit Committee and Consignia Holdings Plc Audit and Risk Committee minutes. Searches were conducted for "*Post Office Audit Committee*" across the HSF, GLO and CCRC databases but no additional minutes were located. POL conducted a further search for "*audit and risk committee*" **AND** "*Consignia Holdings plc*" across the HSF, GLO and CCRC databases but, again, these searches did

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not identify any further minutes.

5.10 Board strategy sessions

5.10.1 In the course of responding to this request, POL obtained from the Company Secretary handwritten notes and action lists of the board's annual strategy sessions between 2012-2018. Whilst these are not (strictly speaking) Board or Sub-Committee minutes, POL nonetheless arranged for these materials to be reviewed for relevance in the absence of formal minutes for these meetings.

5.11 On 22 December 2021, POL produced to the Inquiry **53** relevant sub-committee minutes, together with a production list identifying the documents that had been provided. Specifically, POL produced:

5.11.1 **39** post-2012 minutes of the Audit Risk and Compliance Committee;

5.11.2 **7** pre-2012 minutes of the Risk and Compliance Committee;

5.11.3 **1** Post Office (statutory corporation) Audit Committee minutes;

5.11.4 **3** minutes of the Remuneration Committee;

5.11.5 **1** Annual & Interim Reports Committee minutes; and

5.11.6 **2** board strategy session draft minutes.

6. RULE 9 REQUEST NO. 5 (26 NOVEMBER 2021) – LEGAL ADVICE

6.1 By Rule 9 Request No. 5, the Inquiry sought the production of various documents / categories of documents by no later than 17 December 2021. A list of these documents / categories of documents are set out in Schedule I. In response to this request, POL took the following steps.

6.2 Document Retention and Disclosure Failures (Requests 1 and 2)

6.2.1 POL located and produced to the Inquiry copies of the advices of Simon Clarke (the "**Clarke Advices**") dated 8 July 2013, 15 July 2013, 19 July 2013 and 2 August 2013.

6.2.2 In order to identify materials responsive to Request 2, the following searches were conducted over the general advice files of Cartwright King and previously harvested extracts from the mailboxes of the certain former POL employees, namely Jarnail Singh, Susan Crichton and Alwen Lyons, each of whom appear to have been centrally involved in communicating with Cartwright King:

(A) **Search 1:** All emails sent to/from POL domains to/from Cartwright King domains in the period from 1 July 2013 to 31 August 2013.

(B) **Search 2:** All emails sent to/from POL domains to/from Cartwright King domains during the course of 2013, which are responsive to any of the following search terms: "*Disclosure*" or "*Expert Evidence*" or "*Fujitsu*" or "*Horizon*".

(C) **Search 3:** All emails sent to/from POL domains to/from Cartwright King

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domains, which are responsive to the following search: "*Simon*" or "*Clarke*" w/20 "*Advice*" or "*Advise*" or "*Opinion*" or "*Opine*".

(D) **Search 4:** "*Simon*" or "*Clarke*" **AND** "*July 2013*" or "*August 2013*".

6.2.3 On 17 December 2021, POL produced to the Inquiry **26** documents in response to requests 1 and 2, together with a production list. This comprised the four Clarke Advices described at paragraph 6.2.1 above in response to Request 1, and 23 documents responsive to Request 2.

6.2.4 HSF's letter of 17 December 2021 recorded that POL had been unable to locate copies of certain documents in response to Request 2, including copies of the instructions that were prepared in relation to the Clarke Advices and that it proposed to continue to review potentially relevant materials and conduct further targeted searches with a view to producing any other responsive documents to the Inquiry by 14 January 2022. In particular, POL arranged for **Search 1** and **Search 3** to be conducted across the *entire* mailboxes of Susan Crichton and Rodric Williams (with a start date for Search 1 of 1 June 2013 (rather than 1 July 2013)), with all responsive documents subject to manual review. As explained in HSF's letter of 14 January 2022, these searches did not reveal any further responsive documents.

6.3 **Post-Conviction Review and Disclosure (Requests 3 and 4)**

6.3.1 Peters & Peters have previously collated advices that had been prepared by Brian Altman QC in the period from 2013 to 2016, and instructions in relation to the same. These include the following documents, copies of which POL produced to the Inquiry on 17 December 2021 in response to Requests 3 and 4:

- (A) Mr Altman QC's observations on the Original Terms of Reference dated 2 August 2013;¹
- (B) Mr Altman QC's Interim Review dated 2 August 2013;
- (C) A note of the conference held with Mr Altman QC on 9 September 2013;
- (D) The Amended Terms of Reference in respect of the Prosecution Review;
- (E) The General Review dated 15 October 2013; and
- (F) The Review of Post Office Ltd Prosecution Role dated 19 December 2013.

6.3.2 HSF's letter of 17 December 2021 explained that POL had not been able to locate final versions of (i) the Original Terms of Reference and (ii) the Amended Terms of

¹ As explained in HSF's letter of 17 December 2021, Mr Altman QC was initially instructed by POL to advise and conduct two separate reviews (as reflected in the Original Terms of Reference): (i) a backward-facing review of the processes and strategies adopted by Cartwright King and POL (the "Process Review"); and (ii) a review of POL's role as a prosecutor (the "Prosecution Review"). Following discussions between POL and Mr Altman QC, and observations that he made on the Original Terms of Reference, it appears that Amended Terms of Reference were prepared and circulated. Whereas the Original Terms of Reference had included both of the anticipated reviews, the Amended Terms of Reference were divided into two separate documents, one for the Process Review and the other for the Prosecution Review. The "General Review" dated 15 October 2013 set out Mr Altman QC's advice in relation to the Process Review and the

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Reference for the Process Review. However, the text of these Terms of Reference appears to be quoted in Mr Altman QC's Observations on the Original Terms of Reference dated 2 August 2013 and the General Review dated 15 October 2013 respectively, copies of which were produced to the Inquiry.

- 6.3.3 Mr Altman QC's advice of 19 December 2013 refers to three separate conferences / teleconferences, held on 9 September 2013, 4 October 2013 and 17 October 2013. HSF's letter of 17 December 2021 recorded that POL had located (and produced to the Inquiry) a note prepared in relation to the 9 September conference and that POL proposed to continue to review potentially relevant materials and conduct further targeted searches with a view to identifying any notes that were prepared in relation to the 4 October and 17 October teleconferences. The supplemental searches conducted by POL are set out below, each of which were conducted across the mailboxes of Rodric Williams and Susan Crichton. As recorded in HSF's letter of 14 January 2022, these searches did not identify any additional relevant documents. It is conceivable that notes of these teleconferences were not prepared and/or shared with POL.

- (A) **Search A:** Documents responsive to the following search terms, in the period from 1 October 2013 to 31 October 2013: "*Altman*" and "*Conference*" or "*Note*" or "*Call*" or "*4 October*" or "*4th October*".
- (B) **Search B:** Documents responsive to the following search terms, in the period from 1 October 2013 to 31 October 2013: "*Altman*" and "*Conference*" or "*Note*" or "*Call*" or "*17 October*" or "*17th October*".

6.4 Second Sight Advice (Request 5)

- 6.4.1 In order to identify potentially responsive materials, POL initially conducted a manual review of certain emails and advices in the possession of POL, WBD and HSF. Documents identified through this exercise were then subject to a manual review to confirm their responsiveness to Request 5 and, as explained in POL's letter to the Inquiry of that date, were produced to the Inquiry as appropriate on 17 December 2021.

Targeted Searches

- 6.4.2 As explained in HSF's letter to the Inquiry dated 14 January 2022, POL focused its searches in the time available on the repositories most likely to hold responsive documents. Following the initial production of documents in response to Request 5 on 17 December 2021 referred to above, POL conducted targeted electronic searches over a broader range of documents in order to identify responsive material, which are explained below. In parallel, potentially responsive documents provided by Linklaters were manually reviewed and also produced to the Inquiry as appropriate on 14 January 2022.
- 6.4.3 Documents that were responsive to the searches outlined below were manually reviewed to assess their responsiveness to the request. POL then produced those

"Review of Post Office Ltd Prosecution Role" dated 19 December 2013 contains his advice in relation to the Prosecution Review.

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documents that were responsive to the request and also any non-responsive family documents.

Second Sight Advice (Request 5) – Search Terms
<p><u>Search 1</u></p> <ul style="list-style-type: none"> • <u>Repositories searched</u>: Client files held and identified as potentially relevant by WBD and DAC Beachcroft, as well as client files provided to POL by Cartwright King. • <u>Date Range</u>: 1 January 2013 to 31 December 2015 • <u>Custodians</u>: <ol style="list-style-type: none"> 1. In relation to WBD documents, emails from and to POL addressees to which Andrew Parsons or Gavin Matthews (the relevant WBD partners / managing associates in relation to WBD's involvement in the engagement of Second Sight) are a recipient, a sender, copied or blind copied. • <u>Search terms</u>: <ol style="list-style-type: none"> 1. ("Ian" or "Henderson" or "Ron" or "Second Sight" or "Warmington") <p>AND</p> <ol style="list-style-type: none"> 2. ("Briefing" w/10 "Report"); or 3. ("Draft" w/10 "Report"); or 4. ("Initial" w/10 "Complaint"); or 5. ("Interim" w/10 "Report"); or 6. "Destroy" or "Engage" or "Instruct" or "Terminate"; or 7. "ICRMS" or "Mediation" or "Part 1" or "Part One" or "Part 2" or "Part 2" or "Sparrow"; or 8. "8 July" or "8/7/13" or "08/07/2013" or "25 July" or "25/7/13" or "25/07/2013" or "21 August" or "21/8/14" or "21/08/2014" or "9 April" or "9/4/15" or "09/04/2015" or "10 March" or "10/3/15" or "10/03/2015"
<p><u>Search 2</u></p> <ul style="list-style-type: none"> • <u>Repositories searched</u>: The mailboxes of Susan Crichton and Chris Aujard, who held the position of General Counsel at POL for the period 2012-2013 and 2013-2015 respectively. • <u>Date Range</u>: 1 July 2013 to 30 June 2014 • <u>Search Terms</u>: Those set out in respect of Search 1 above.
<p><u>Search 3</u></p>

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Second Sight Advice (Request 5) – Search Terms
<ul style="list-style-type: none"> • <u>Repositories searched</u>: Emails previously harvested by HSF from the mailboxes of Jane MacLeod, Chris Aujard and Alwen Lyons.² • <u>Search terms</u>: Those set out in respect of Search 1 above.
<p><u>Search 4</u></p> <ul style="list-style-type: none"> • <u>Repositories searched</u>: The mailboxes of Chris Aujard, Jane MacLeod and Rodric Williams. • <u>Date Range</u>: 1 January 2014 to 1 June 2015. • <u>Search terms</u>: <ol style="list-style-type: none"> 1. "terminat*" w/10 "engagement" 2. "terminat*" w/10 "Second Sight" 3. "terminat*" w/10 "SS"
<p><u>Search 5</u></p> <ul style="list-style-type: none"> • <u>Repositories searched</u>: The mailboxes of Chris Aujard, Jane MacLeod and Rodric Williams. • <u>Date Range</u>: 1 February 2015 to 1 June 2015 • <u>Search terms</u>: <ol style="list-style-type: none"> 1. "destr*" w/5 "document" 2. "return*" w/5 "document"

6.4.4 Following this production, as HSF explained in a letter to the Inquiry dated 5 April 2022, it became apparent that, due to a technical issue with the documents that were provided by WBD to KPMG (POL's e-Discovery provider), the date range searches that were carried out in relation to Second Sight materials did not provide accurate results with regard to a certain type of data. This issue has since been resolved and the search terms that POL initially applied in respect of Second Sight (set out in Search 1 above) were re-run. POL is in a position to produce additional responsive documents to the Inquiry once it has been provided with a Quatrix link.

6.4.5 Across the various productions that include documents responsive to this request, POL has produced a total of **1,121** documents.

6.5 Group Litigation Advice (Request 6)

6.5.1 As with Request 5 above, POL identified documents responsive to Request 6 by a combination of (i) reviewing an initial set of potentially responsive materials that were identified from documents provided by POL and its external legal advisors

² The search parameters applied when conducting this harvest were: Date Range: 1 July 2014 to 31 August 2016; Search Terms: "Second Sight*" or "SS" or "Warmington" or "Henderson" or "Parsons" or "Brooks" or "Brookes" or "Loraine".

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(including WBD and Norton Rose Fulbright ("**NRF**")), and (ii) conducting targeted searches across various repositories and manually reviewing responsive results.

Potentially responsive materials

6.5.2 In order to produce a list of potentially responsive materials, a manual review was conducted of documents and emails: (a) provided by POL to HSF from the time of HSF's engagement by POL in 2019 in relation to the GLO; (b) in relation to legal advices provided by HSF to POL; (c) provided by NRF in relation to its involvement in the GLO; and (d) identified by WBD as potentially responsive to Request 6 following WBD's own manual review. Manual reviews of these documents were then conducted to determine which particular documents were responsive to Request 6. In addition to the above, POL conducted a review of:

- (A) Papers that were prepared for regular meetings of a Steering Committee ("SteerCo") that was established by POL in 2016 to co-ordinate its approach and response to the Group Litigation.
- (B) The minutes of SteerCo (or similar) meetings in 2019 identified and provided by POL to HSF.
- (C) Papers that were prepared for the sub-committee of POL's board (the "**GLO board sub-committee**") that was established by POL in around March 2018 in order for the Board to receive legal advice in relation to POL's defence of the Group Litigation and held regular meetings from 26 March 2018 to 10 December 2019.
- (D) The minutes of the GLO board sub-committee identified and provided by POL to HSF.
- (E) Papers that were prepared for POL's board in relation to the conduct of POL's defence of the Group Litigation identified and provided by POL to HSF; and
- (F) Proofs of evidence and notes from witness proofing meetings in relation to the Common Issues trial and Horizon Issues trial, identified and provided to POL by WBD.

Targeted Searches

6.5.3 Following the initial production of documents in response to Request 6, POL conducted targeted electronic searches over a broader range of documents – principally documents held by WBD – in order to identify responsive material. A summary of these searches is set out below, including a description of the search terms that were applied and the repositories across which these searches were applied.

6.5.4 Documents that were responsive to the searches outlined below were manually reviewed to assess their responsiveness to the request. POL then produced those documents that were responsive to the request and also any non-responsive family documents.

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- Repositories searched: Electronic client files held and identified as potentially relevant by WBD. These consisted principally of the Group Litigation matter files themselves, which comprised emails and attachments that had been filed in relation to those matters. However, to the extent that searches were run over other WBD files (such as those relating to the claims of individual claimants, the contents of which related to the Group Litigation), the following search terms were applied:
 1. "Bates"
 2. "Freeths"
 3. "GLO"
 4. "Group Litigation"
- Date Range: N/A
- Custodians:
 1. Emails from and to Paula Vennells, Al Cameron, Tom Moran or Jane Macleod to which Andrew Parsons or Gavin Matthews are a recipient, a sender, copied or blind copied.
 2. Emails from and to POL addressees to which David Cavender QC, Anthony de Garr Robinson QC, Lord Grabiner QC and the Rt Hon. Lord Neuberger of Abbotsbury are a recipient, a sender, copied or blind copied.
- Search terms:
 1. "adv*"
 2. "counsel"
 3. "Instruct*"
 4. "opin*"
 5. "Option*"
 6. "Recommend*"
 7. "Strat*"

Search 2

- Repositories searched: See Search 1 above.
- Date Range: 1 January 2017 to 31 May 2017.
- Custodians:
 1. Emails from and to POL addressees to which Andrew Parsons or Gavin Matthews are a recipient, a sender, copied or blind copied.
- Search terms:
 1. "adv*"

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GLO Advice (Request 6) – Search Terms
<ol style="list-style-type: none"> 2. "counsel" 3. "Instruct**" 4. "opin**" 5. "Option**" 6. "Recommend**" 7. "Strat**"
<p><u>Search 3</u></p> <ul style="list-style-type: none"> • <u>Repositories searched</u>: See Search 1 above. • <u>Date Range</u>: 1 January 2019 to 31 December 2019. • <u>Custodians</u>: <ol style="list-style-type: none"> 1. Emails from and to POL addressees to which Andrew Parsons, Tom Beezer or Gavin Matthews are a recipient, a sender, copied or blind copied. • <u>Search terms</u>: <ol style="list-style-type: none"> 1. "Grabiner" 2. "Neuberger" 3. "Recus**"
<p><u>Search 4</u></p> <ul style="list-style-type: none"> • <u>Repositories searched</u>: See Search 1 above. • <u>Date Range</u>: 1 January 2015 onwards. • <u>Custodians</u>: <ol style="list-style-type: none"> 1. Emails from and to Paula Vennells, Al Cameron, Tom Moran or Jane Macleod to which Andrew Parsons or Gavin Matthews are a recipient, a sender, copied or blind copied; and 2. Emails from and to POL addressees to which David Cavender QC, Anthony de Garr Robinson QC, Lord Grabiner QC and the Rt Hon. Lord Neuberger of Abbotsbury are a recipient, a sender, copied or blind copied. • <u>Search terms</u>: <ol style="list-style-type: none"> 1. "adv**" or "counsel" or "Disclos**" or "Instruct**" or "opin**" or "Option**" or "Recommend**" or "Strat**" <p style="text-align: center;">AND</p> <ol style="list-style-type: none"> 2. "Jenkins" or "KEL" or "Known Error Log" or "Log"

6.5.5 Following these productions, as POL informed the Inquiry in its letter dated 5 April 2022, in the course of reviewing documents for the purpose of the Inquiry's Rule 9

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request of 28 February 2022, POL identified an email from Rodric Williams which POL considered to be responsive to Request 6. POL produced the email to the Inquiry. In view of that email, POL conducted a targeted review of email correspondence between Mr Williams and WBD to identify any further documents that may be responsive to Request 6.³ POL is in a position to produce these additional responsive documents to the Inquiry once it has been provided with a Quatrix link.

6.5.6 Across the various productions that include documents responsive to this request, POL has produced a total of **4,298** documents.

6.5.7 As explained in HSF's letter to the Inquiry dated 14 January 2022, in order to identify documents responsive to this request, POL sought to focus its searches in the time available on the repositories most likely to hold responsive documents. POL noted that whilst further searches could theoretically have been carried out to identify other potentially responsive documents, it appeared to POL that any such documents may only have limited probative value.

6.6 **Board Minutes (Request 7)**

6.6.1 POL had already responded to this aspect of the Rule 9 Request (as part of its response to the Request No. 4). Accordingly, no further action was taken in respect of this Request 7.

7. **RULE 9 REQUEST NO. 6 (3 DECEMBER 2021) – INFORMATION AND DOCUMENTS CONCERNING PROSECUTIONS**

7.1 By its Request No. 6, the Inquiry requested that POL provide the following explanation and documents by no later than **17 December 2021**:

7.1.1 Prosecution Statistics: Confirmation of the number of prosecutions that POL brought (in total) between 2000 and 2015 and the number of those prosecutions that resulted in a conviction.

7.1.2 Prosecution Files: All of POL's prosecution files relating to any conviction (of an SPM, assistant or employee) which took place in the years 2001 and 2011.

7.2 POL's response to the Inquiry's request for "Prosecution Statistics" was provided on 15 December 2021, with the requested "Prosecution Files" produced on 17 December 2021. As explained in HSF's letter of 15 December 2021, POL adopted the following approach in identifying these materials and producing the requested information to the Inquiry.

7.3 Prosecution Statistics

7.3.1 The information provided by POL in its letter of 15 December 2021 related to private prosecutions brought by POL (or, pre-separation, RMG), and which were brought (entirely or in part) on the basis of evidence from the Horizon IT system. It

³ Search Terms: "Strat*" or "Option*" or "Recommend*" or "Instruct*" or "adv*" or "counsel" or "Opin*" or "disco*"; Date Range: 1 January 2015 to 31 December 2019.

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did not include cases brought in Northern Ireland or Scotland, on the basis that such cases were conducted by public authorities.

- 7.3.2 The principal source of information relied upon to produce this information was contemporaneous casework spreadsheets that were manually created and maintained at the time of the investigations / prosecutions by the POL Security Team. In the course of collating and analysing this information, Peters & Peters identified instances of incomplete, incorrect or inconsistent data, some of which they were unable to reconcile. Where Peters & Peters were unable to verify information, it was assumed that the prosecutions fell within the Post-Conviction Disclosure Exercise ("PCDE"). Peters & Peters confirmed that to date they have not identified any prosecutions that were within scope of the PCDE and which had not been reflected in the casework spreadsheets.

7.4 Prosecution Case Files

- 7.4.1 POL produced to the Inquiry documents located in each of the following document repositories, to the extent that these documents had been identified by Peters & Peters as part of the PCDE as relating to any individuals who were convicted in 2001 or 2011:

- (A) The electronic Security team SharePoint system;
- (B) The hard copy Security team folders;
- (C) The hard copy RMG 'Buff Files', which were created and maintained by RMG's criminal law team (and, post-separation, by POL's criminal law team);
- (D) The defence case files, consisting of documents identified for disclosure to convicted individuals by Peters & Peters as part of the PCDE; and
- (E) Disclosable to Appellant, consisting of documents identified by Peters & Peters as meeting the test for disclosure to a convicted individual under the Criminal Procedure and Investigations Act.

- 7.5 POL has produced a total of **14,586** documents (29 documents in relation to convictions secured in 2001, and 14,557 documents in relation to convictions secured in 2011). As explained in HSF's letter of 15 December 2021, only very limited materials were available in respect of convictions secured in 2001, in part as a result of the application of a 'business as usual' document retention policies, under which POL/RMG would destroy documents after six years.

8. RULE 9 REQUEST NO. 7 (13 DECEMBER 2021) – HORIZON ROLL-OUT MATERIALS

- 8.1 By its Request No. 7, the Inquiry requested that POL produce to the Inquiry by 29 December 2021:

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- 8.1.1 three named Reports referred to in the Trade and Industry Select Committee 11th Report of September 1999;
- 8.1.2 minutes of the Horizon Working Group; and
- 8.1.3 reports of the Horizon Working Group.
- 8.2 In an effort to locate documents responsive to this request, POL (i) conducted targeted searches for relevant electronic documents and (ii) reviewed hard copy materials held at the Postal Museum and Oasis archives.
- 8.3 Initial searches were carried out for the specific documents sought by running appropriate key word searches over the electronic documents held in Relativity. In particular, POL conducted the following searches across each of the HSF, GLO and CCRC Databases. As explained in HSF's letter of 23 December 2021, these searches did not identify any responsive documents.
 - 8.3.1 **Search 1:** Documents responsive to the following search terms, in the period from 1 January 1997 – 1 January 1999:
 - (A) "Adrian Montague"
 - (B) "Benefits Payment Card" **AND** "Report"
 - (C) "Consulting Group" **AND** "Report"
 - (D) "Corbett" **AND** "Report"
 - (E) "Graham Corbett"
 - (F) "Montague" **AND** "Report"
 - (G) "PA Consulting Group"
 - (H) "Report" **AND** ("October 1997" or "July 1998" or "October 1998")
 - 8.3.2 **Search 2:** Documents responsive to the following search terms:
 - (A) "Horizon Working Group"
 - (B) "HWG"
 - (C) "Horizon" **AND** "Working Group"
 - (D) ("Horizon Working Group" **AND** ("Minutes" or "Meeting"))
 - (E) (("Horizon Working Group" or "HWG" or ("Horizon" **AND** "Working Group")) **AND** ("John Roberts" or "Jerry Cope" or "Stuart Sweetman"))
 - (F) ("Horizon Working Group" or "HWG" or ("Horizon" **AND** "Working Group")) **AND** "Ian McCartney"
 - (G) ("Horizon Working Group" or "HWG" or ("Horizon" **AND** "Working Group")) **AND** "Alan Johnson".

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8.3.3 **Search 3:** Documents responsive to the following search terms:

- (A) "Horizon Working Group" **AND** "Report"
- (B) ("Horizon Working Group" or "HWG" or ("Horizon" **AND** "Working Group"))
AND "Cabinet Office" **AND** ("December 1999" OR "1999").

8.4 POL also searched hard copy documents held at the Oasis archives in Winchester and the Postal Museum for responsiveness to this request. These searches were undertaken at the same time as searches for the documents requested by the Inquiry under Request No. 9, and full details are set out below at paragraph 10 below.⁴

8.5 Files that were identified during onsite hard copy reviews as being potentially responsive to Request No. 7 were scanned and uploaded to Relativity and each document contained within those files was then manually reviewed.

8.6 POL provided the responsive documents to the Inquiry on 11 February 2022. This comprised copies of the (three) individual Reports sought, and a number of documents relating to the Horizon Working Group. In total, **nine** documents were produced to the Inquiry in response to this request.

8.7 It is possible that further documents may be located in other hard copy repositories which are being searched. However, this is uncertain due to the date of creation of the documents requested. Applying POL's seven-year retention of documents policy, and even assuming that the documents would have been within scope of the litigation stop notice issued in 2014, many of the documents which existed in hard copy from this period are likely to have been lost or destroyed in the usual course of business prior to the notice being issued. Furthermore, in as far as the documents requested were ever held electronically, then it is unlikely that they were migrated to POL following its separation from RMG in 2012 as many employees who had been involved in creating and handling these documents were likely to have left POL's employment and therefore not be caught in the harvesting of POL documents described in the main body of this statement.

9. RULE 9 REQUEST NO. 8 (17 DECEMBER 2021) – TEACH-IN WITNESS STATEMENTS

9.1 By its Request No. 8, the Inquiry requested (i) draft witness statements, and (ii) any related documents, from the appropriate persons within POL in relation to a series of teach-in sessions with POL employees held between April and June 2021, prior to the conversion of the Inquiry into a statutory Inquiry from 1 June 2021.

9.2 In particular, the Request sought *"the same or similar information that was received"* during the teach-in sessions and set out a series of 53 more specific requests for information to be covered by the witness statements requested. The Request also sought copies of all documents in POL's possession that were referred to during, or otherwise provided in relation to, the teach-in sessions.

9.3 POL identified three individuals who were able to provide the witness statements requested. As part of the preparation of these witness statements, POL sought to identify, and exhibit

⁴ Request No. 9 and Request No. 7 had multiple common factors. Both requests focused on the earliest documents relevant to the Horizon IT system, dating back to 1994. Further, both requests sought a combination of specific documents and classes or types of documents.

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to each witness statement, any documents that were relevant to the issues covered by that statement.

- 9.4 POL had maintained a record of the documents provided to the Inquiry as part of the teach-in sessions and subsequently in response to the Inquiry's Batch 6 information request (issued prior to its conversion to a statutory Inquiry) regarding additional materials referenced during the sessions. Using this record, POL was able to identify the responsive documents. For other documents, POL conducted targeted searches.
- 9.5 POL provided the draft witness statements requested to the Inquiry by way of email on 8 February 2022. On the same day, POL also produced exhibits to these statements, together with documents responsive to Part 54 of the Request, which together represented **128** documents.

10. RULE 9 REQUEST NO. 9 (17 DECEMBER 2021) – FURTHER HORIZON ROLL-OUT MATERIALS

- 10.1 By its Request No. 9, the Inquiry sought specific documents and certain broader categories of documents relating to the adoption and design of the Horizon IT system, and also the pilot and roll-out of the system. Responsive documents were identified by a manual review of hard-copy documents stored at the Oasis archives in Winchester and the Postal Museum, as well as by targeted searches for electronic documents.

Oasis archive (Winchester)

- 10.2 The Oasis archive comprises over 70,000 boxes and some 30,000 files. These boxes and files consist of a wide range of documents including (but not limited to) individual branch records, HR records, audit files, public consultation documents, and the working papers of individuals. Descriptions of the majority of these boxes and files are set out in two indices (the "**Oasis indices**"), one for boxes and one for files. There were also many boxes and files – be around 5,000 – which were unindexed. POL has recently indexed and scanned these files and boxes and is in the process of arranging for these to be manually reviewed. Any documents identified as relevant to this or other Rule 9 requests will be disclosed to the Inquiry.
- 10.3 POL conducted keyword searches across the Oasis indices in order to identify files and boxes which appeared from their descriptions to contain potentially responsive material to Request No. 7 and Request No. 9. These include the following: "*Horizon*"; or "*ICL*"; or "*Pathway*"; or "*CAPS*"; or "*Treasury*"; or "*Consulting*"; or "*Corbett*"; or "*Montague*"; or "*Roberts*" or "*Johnson*" or "*DSS*" or "*Benefit*" or "*Benefits*" or "*DTI*" or "*Select*" or "*Cabinet*" or "*HWG*" or "*Working Group*" or "*Payment*" or "*Consultancy*".
- 10.4 The descriptions of the boxes and files that were responsive to these search terms, as well as the dates on which they were archived, were considered on a line-by-line basis to filter out any that appeared on manual review to be irrelevant. Where there was uncertainty as to whether a particular file or box was likely to be relevant, POL erred on the side of inclusion, so as to minimise the risk of responsive documents being missed. A further manual review of the indices was then undertaken to identify any additional files or boxes whose descriptions in the indices were not responsive to keyword searches but which had been archived by particular individuals, or which appeared from their names to relate to projects

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which could have related to Horizon.⁵

10.5 These searches produced lists of:

10.5.1 **18** files that were reviewed for relevance to Request No. 7; and

10.5.2 In excess of **480** files (across approximately 125 boxes) that were reviewed for relevance to Request No. 9.

10.6 Any files which were identified as containing responsive material were scanned and uploaded to Relativity, and subject to a manual review.

Postal Museum

10.7 POL provided a list of documents (described in the same terms as in the relevant requests) to the archivists at the Postal Museum. The archivists then undertook searches of the materials that they hold based on keyword searches that they believed were most likely to identify the material. POL then attended the Postal Museum in January 2022 to review in hard copy the files and documents which were responsive to the archivists' searches and which POL considered may be relevant to the requests.

10.8 Once relevant files had been identified, document processing specialists attended in January and February 2022 to undertake on-site scanning, as removal of the documents from the Postal Museum is not permitted. The documents were then uploaded to Relativity and manually reviewed, and the documents that were responsive to the requests were provided to the Inquiry.

Electronic documents

10.9 POL also conducted searches across the electronic documents held in Relativity (in particular, over documents hosted on the GLO Database), save that where copies of specific documents requested in the Request No. 9 had already been located in the hard copy repositories, no further searches were undertaken.

10.10 POL used iterative searches to locate documents in response to each item requested under Request No. 9, refining the searches depending on information gathered from previous searches, such as likely date ranges, relevant names of authors or recipients, document titles, terms or footer references. Where categories of document were sought, rather than individual documents, a similar approach was adopted searching for the particular category of documents. A full list of keyword searches is set out below.

10.11 Documents responsive to targeted searches across the GLO Database were reviewed and, to the extent responsive, were produced to the Inquiry. As part of this review, a number of documents were identified as responsive but subject to joint legal privilege held by POL and other entities such as Fujitsu, the Department of Work and Pensions, HM Treasury and BEIS. These documents were therefore withheld from production until POL had obtained the

⁵ For example, POL considered on a line-by-line basis the descriptions of each of the files which had been archived by the Horizon Director, the Horizon Commercial Manager, the Horizon Change Control Manager and certain secretarial / support staff who appeared to have filed materials relating to Horizon around the time of the roll-out.

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consent of the relevant privilege holder to produce copies to the Inquiry. Once this consent was obtained, all documents identified as relevant were produced to the Inquiry.

Request No. 9 – Search Terms

Repositories Searched: GLO Database

Date Range: 1995 – 2000. Please note that, due to the limited metadata available, it was not always possible to refine searches by reference to the date field in Relativity.

Search Terms:

- Request 1: Document located in hard copy – no electronic searches conducted.
- Request 2: Document located in hard copy – no electronic searches conducted.
- Request 3: Document located in hard copy – no electronic searches conducted.
- Requests 4 and 5:
 1. ("risk" w/2 "register") AND ("ICL" w/2 "path*") AND ("procurement" w/2 "authority") AND "horizon"
 2. ("risk" w/2 "register") AND ("ICL" w/2 "path*")
 3. ("risk" w/2 "register") AND ("pathway" w/2 "proposal")
 4. "ECCO" w/5 ("RISK" w/2 "REGISTER")
 5. "path*" w/5 ("risk" w/2 "manager")
 6. "risk management database"
 7. "risk" AND ("register" or "report" or "proposal") AND "1996"
- Request 6: Document located in hard copy – no electronic searches conducted.
- Request 7:
 1. ("ICL" w/2 "Pathway") AND ("respon*" w/3 "tender") AND "horizon"
 2. ("invitation to tender") AND ("ICL" w/2 "Pathway")
 3. "Dick" AND "horizon" AND "tender"
 4. "DICK" AND ("respon*" w/3 "tender")
 5. "Service provider solutions document"
 6. Document Title: "Solution Summary"
 7. "DICK" AND "BID" AND "PRICE"
 8. "Service provider" AND "dick" AND NOT ("dick" w/2 "long")
 9. "DSS/POCL procurement opportunity" AND "1996"
 10. "Dicks" AND "bid"
 11. "pathway response to OJEC notice 94/s 165-58937/EN"
 12. "94/s 165-58937/EN"
 13. "pathway response" AND "1996"
- Request 8:
 1. "Procurement Authority"

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2. "Procurement" w/2 "Authority"
3. "PDA" AND "Pat Kelsey"
4. ("Procurement" w/1 "Authority") AND "project board"

- Request 9:

1. "Project Management Board" AND ("1995" or "1996")
2. "Project Management Board"

- Request 10:

1. "authorities agreement"
2. "DSS VERSION 5.0"
3. "POCL SERVICE ENVIRONMENT"
4. "DSS Agreement" AND "Schedule" AND ("Restricted" w/3 "Contracts")
5. "POCL Agreement" AND "Schedule" AND ("Restricted" w/3 "Contracts") AND "K07"
6. "authorities agreement" AND ("15 May" or "15/05" or "15.05" or "15th May")
7. ("15 May" or "15/05" or "15.05" or "15th May") AND "ICL" AND ("POCL" or "Post Office Counters Limited") AND ("DSS" or "Department for Social Security") AND ("agreement" or "contract") AND (Document is not responsive to Search 2 above)
8. "Authorities' Agreement" AND "Schedule" AND "restricted - contracts"
9. "Authorities Version" AND "15 May 1996"
10. "Authorities Version" AND "Volume Two"
11. "DSS Version" AND "15 May 1996"
12. "Authorities' Agreement" AND "schedule 1"
13. "Authorities' Agreement" AND "service environment" AND "schedule"
14. "Authorities' Agreement" AND "service environment" AND "schedule"
15. "authorities' agreement" AND "schedule" w/2 "assumptions"
16. "CR/POL/002"
17. "Service Infrastructure Acceptance Criteria"
18. "Authorities' agreement" AND "schedule C"
19. "schedule C" AND "operational" AND "trial"

- Request 11: See search terms applied for Requests 3 and 4 above

- Request 12:

1. ("horizon" w/10 "replan") AND "February 1997"
2. "horizon" w/10 "replan"
3. "no fault" AND "replan" AND "horizon"
4. ("change" w/5 "request") AND ("February" w/10 "1997")
5. "no-fault" AND "re-plan"

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6. "no-fault"
 7. "re-plan" AND "defer" AND "1997"
 8. "re-plan" AND "1997"
 9. "ICL pathway re-plan proposal"
 10. "CCN 105"
 11. "re-plan" AND "February 1997"
 12. "re-plan" AND "agreement"
- Requests 13 and 14:
 1. ("ICL" w/2 "pathway") AND ("notice" w/2 "default")
 2. ("notice" w/2 "default")
 3. ("ICL" w/2 "pathway") AND "notice" AND "Bennett"
 4. ("ICL" w/2 "pathway") AND ("authorities" w/2 "agreement")
 5. ("ICL" w/2 "pathway") AND ("authorities" w/2 "agreement") AND "Christou"
 6. ("authorities" w/2 "agreement") AND "Bennett"
 7. ("pathway" w/2 "group") AND "Bennett" AND "notice"
 8. ("pathway" w/2 "group") AND "Bennett" AND "notice" AND ("live" w/2 "trial")
 9. ("clause" w/2 "603")
 10. "CCN" AND ("Bennett" or "Christou")
 11. ("breach" w/2 "contract")
 12. ("breach" w/2 "contract") AND ("letter" or "notice")
 13. ("breach" w/2 "contract") AND "notice" AND "Bennett"
 14. ("breach" w/2 "contract") AND "notice" AND ("November" w/2 "1997") AND "Bennett"
 15. ("breach" w/2 "contract") AND "notice" AND ("November" w/2 "1997")
 16. "21 November 1997"
 17. "21 November 1997" AND ("Bennett" or "breach")
 18. ("benefits agency" or "default" or "breach") AND "December 1997" AND "pathway" AND "November 1997"
 19. "pathway" AND "PDA" AND "December 1997"
 20. "pathway" AND "PDA" AND "December 1997" AND "benefits agency" AND "trial"
 21. "PDA" AND "benefits agency" AND "post office counters" AND "pathway" AND "live trial" AND "1997"
 22. "PDA" AND "benefits agency" AND "post office counters" AND "pathway" AND "live trial" AND "May 1998" AND "default"
 23. "authorities agreement" AND ("breach" or "default") AND "1997"
 24. "authorities agreement" AND "default" AND "November 1997"
 25. "trial" AND "default" AND "November 1997"
 26. "trial" AND "default" AND "November 1997" AND "authorities agreement"

Interim Disclosure Statement**27 May 2022****Request No. 9 – Search Terms**• Request 15:

1. ("Brief*" or "Report*") **AND** ("Delivery Authority" or "PDA") **AND** "Management Board"
2. ("Brief*" or "Report*") **AND** ("Delivery Authority" or "PDA") **AND** "Project Director" **AND** (Document not responsive to Search 1 above)
3. ("Brief*" or "Report*") **AND** ("Delivery Authority" or "PDA") **AND** "Steering Committee" **AND** (Document not responsive to Searches 1 or 2 above)
4. ("Brief*" or "Report*") **AND** ("Delivery Authority" or "PDA") **AND** "Project Board" **AND** (Document is not responsive to Searches 1, 2 or 3 above)
5. ("Delivery Authority" or "PDA") **AND** "Nile" **AND** (Document is not responsive to Searches 1, 2, 3 or 4 above)
6. ("Delivery Authority" or "PDA") **AND** "Crahan" **AND** (Document is not responsive to Searches 1, 2 or 3 above)

• Request 16:

1. "project board" **AND** ("minutes" w/5 "meeting") **AND** ("May" w/3 "1996")
2. "project board" **AND** ("minutes" w/3 "meeting") **AND** "June 1996"
3. "project board" **AND** ("minutes" w/3 "meeting") **AND** ("1996" or "1997" or "1998")
4. "project steering committee" **AND** ("minutes" w/3 "meeting") **AND** ("1996" or "1997" or "1998")
5. "BIIP SteerCo" **AND** "minutes"
6. "SteerCo" **AND** "minutes" **AND** ("1996" or "1997" or "1998")
7. "Miller" **AND** "Sweetman" **AND** "committee" **AND** "minutes" **AND** ("1996" or "1997" or "1998") **AND** "steer"

• Request 17:

1. "Minutes" **AND** "Project Board"
2. "Post office project board"
3. "horizon project board"
4. "board" **AND** "minutes"
5. "Programme Board" **AND** "Minutes"
6. ("Dave Miller" or "Stuart Sweetman") **AND** "board"

• Request 18:

1. "Project Manager" **AND** ("Customer Accounting and Payment Systems" or "CAPS")
2. "Report*" **AND** ("Customer Accounting and Payment System" w/3 "Board") or ("CAPS" w/3 "Board") **AND** (Document is not responsive to Search 1 above)
3. ("Customer Accounting and Payment System" w/3 "Board") or ("CAPS" w/3 "Board") **AND** (Document is not responsive to Searches 1 or 2 above)
4. "Project Manager" **AND** ("POCL" or "Post Office") **AND** ("BA" or "Benefits Agency" or "DSS" or "Department") w/3 "Board" **AND** ("report*" or "brief*" or

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- "paper*" or "memorand*") **AND** (Document is not responsive to Searches 1 or 2 above)
5. ("POCL" or "Post Office") **AND** ("BA" or "Benefits Agency" or "DSS" or "Department") **w/3** "Board" **AND** ("report*" or "brief*" or "paper*" or "memorand*") **AND** (Document is not responsive to Searches 1, 2, 3 or 4 above)
 6. ("CAPS Programme Executive team") **AND** ("report*" or "brief*" or "paper*" or "memorand*") **AND** (Document is not responsive to Searches 1, 2, 3 or 4 above)
- Request 19:
 1. "horizon project team"
 2. "horizon project team" **w/10** "testing"
 3. "implementation" **w/5** "horizon system"
 4. "Horizon" **w/10** "live trial"
 5. "Horizon" **w/10** "testing"
 6. "David Miller" **w/10** "live trial"
 7. "David Miller" **w/10** "trial"
 8. "Horizon Testing Manager"
 9. "Simon Rilot"
 - Request 20:
 1. "icl pathway proposal"
 2. "icl pathway proposal" **AND** variation*
 3. "strictly private" **AND** "confidential" **AND** "pathway"
 4. "strictly private" **AND** "confidential" **AND** "pathway" **AND** "proposal"
 5. "commercial and contractual proposals"
 6. ("acceptance" **w/3** "proposal") **AND** "pathway"
 7. "pathway funding paper"
 - Request 21:
 1. "24 May 1999" **AND** ("withdraw*" or "terminat*" or "cancel*")
 2. "24 May 1999" **AND** ("cancel*" or "terminat*") **AND** "social"
 3. "24 May 1999" **AND** (terminat*" or "cancel*" or "withdraw*") **AND** "DSS"
 4. ("DSS agreement" or "authorities agreement") **AND** ("May" **w/4** "1999")
 5. "DSS agreement" **AND** ("May" **w/4** "1999") **AND** ("24" **w/4** "May")
 6. ("24" **w/4** "May") **AND** "DSS" **AND** "1997" **AND** ("withdraw*" or "cancel*" or "terminat*") **AND** "agreement" **AND** "DSS agreement"
 - Request 22:
 1. "Heads of Agreement" **AND** "1999"
 2. "Letter Agreement" **AND** "Heads of Agreement" **AND** "1999"

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1. *("post" w/5 "limited") AND ("ICL" w/2 "pathway") AND ("July" w/2 "1999")*
2. *("codified" w/2 "agreement") AND ("July" w/2 "1999")*
3. *"Under the Letter Agreement Post Office Counters Ltd and ICL Pathway Limited agreed, inter alia, to replace the Post Office Agreement and the Authorities Agreement (each as amended under change control procedures) with a single agreement (the "Codified Agreement") codifying the changes to those agreements agreed in the Letter Agreement"*
4. *"This Codified Agreement is made the 28th day of July, 1999"*
5. *"Paul Lam-Po-Tang"*
6. *"Gavrelle House"*
7. *"Sweetman" AND ("Codified" w/2 "Agreement")*
8. *"J Cook" AND ("Codified" w/2 "Agreement")*
9. *"CA991520"*
10. *"CA99" AND "schedule"*
11. *"Schedule A5"*
12. *"Schedule A6" AND "approach to remedies"*
13. *"Schedule A8"*
14. *"Schedule A9" AND "asset transfer"*
15. *"Schedule 1" AND "POCL Service Environment"*
16. *"Schedule A2" AND "policies and standards"*
17. *"Schedule A3" AND "Audit"*
18. *"Schedule A4" AND "contract management"*

• Request 24(a):

1. *"variation*" AND "acceptance criteria" AND ("ICL" or "Pathway")*
2. *"acceptance" AND "variation" AND ("slaughter" or "Bird" or "masons" or "Christou") AND ("ICL" or "Pathway")*
3. *"acceptance" AND ("slaughter" or "Bird" or "masons" or "Christou") AND ("ICL" or "Pathway") AND (Document is not responsive to Searches 1 or 2 above)*
4. *("variation*" or "change*" or "modification*") and "acceptance" AND ("ICL" or "Pathway") AND ("1998" or "98") or ("1999" or "99")) AND (Document is not responsive to Searches 1, 2 or 3 above)*

• Request 24(b):

1. *("DSS" or "Department of Social Security") AND ("agreement" or "contract") AND "terms" AND ("terminat*" or "withdraw*") AND (("99" or "1999") or ("98" or "1998")) AND "Benefits Payment"*

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2. ("DSS" or "Department of Social Security") **AND** ("terminat*" or "withdraw*") **AND** "terms" **AND** "DSS Agreement" **AND** (Document is not responsive to Search 1 above)

- Request 24(c) and (d):

1. "privilege*" **AND** ("June" w/3 "1999") **AND** ("slaughter" w/2 "may") or "bird" or "masons"
2. "privilege*" **AND** ("July" w/3 "1999") **AND** ("slaughter" w/2 "may") or "bird" or "masons"
3. "legal advice" **AND** ("May 1999" or "June 1999" or "July 1999") **AND** "privil*"
4. "post office counters" **AND** "pathway" **AND** ("May" w/2 "1999") **AND** "advice" **AND** "privil*"
5. "post office counters" **AND** "pathway" **AND** "letter agreement" **AND** "advice"
6. "post office counters" **AND** "pathway" **AND** "letter agreement" **AND** "advice" **AND** "privil*"
7. "post office counters" **AND** "pathway" **AND** "letter agreement" **AND** ("slaughter" or "bird")
8. ("non" w/2 "binding") **AND** "advice" **AND** "agreement" **AND** ("privil*" or "pathway" or "post office")
9. "report" **AND** "pathway" **AND** "post office" **AND** "1999" **AND** "May" **AND** "advice" **AND** "privil*" **AND** "agreement" **AND** "legal" **AND** "execut*" **AND** "fixed payment"
10. "briefing" **AND** "pathway" **AND** "post office" **AND** "1999" **AND** ("May" or "June" or "July") **AND** "advice" **AND** "privil*"
11. "fixed payment" **AND** "post office" **AND** "pathway" **AND** ("letter agreement" or "heads of agreement")
12. "post office" **AND** "pathway" **AND** "heads of agreement"
13. "codified agreement" **AND** (("May" w/2 "1999") or ("June" w/2 "1999") or ("July" w/2 "1999")) **AND** "privil*"
14. "codified agreement" **AND** ("July" w/2 "1999") **AND** "privil*" **AND** "advice"
15. "privilege*" **AND** "delay*" **AND** "acceptance" **AND** "advice" **AND** "slaughter" **AND** "horizon" **AND** "confidential"

Productions

- 10.12 An initial set of responsive documents was produced to the Inquiry on 11 February 2022, with supplemental productions on 18 February 2022 (relating to requests 15 – 19 and 24), 4 March 2022 (Fujitsu joint privilege documents), 8 April 2022 (BEIS and DWP documents) and 5 May 2022 (Treasury documents). Further responsive documents were also produced on 6 May 2022.
- 10.13 Across the various productions that include documents responsive to this request, POL produced a total of **1,033** documents.
- 10.14 It is possible that further documents may be located in other hard copy repositories which are being searched. However, this is uncertain due to the date of creation of the documents

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requested. Applying POL's seven-year retention of documents policy, and even assuming that the documents would have been within scope of the litigation stop notice issued in 2014, many of the documents which existed in hard copy from this period are likely to have been lost or destroyed in the usual course of business prior to the notice being issued. Furthermore, in as far as the documents requested were ever held electronically, then it is unlikely that they were migrated to POL following its separation from RMG in 2012 as many employees who had been involved in creating and handling these documents were likely to have left POL's employment and therefore not be caught in the harvesting of POL documents described in the main body of this statement.

11. RULE 9 REQUEST NO. 10 (18 FEBRUARY 2022) – DOCUMENTS AND INFORMATION RELEVANT TO PHASES 2 AND 3

11.1 By its Request No. 10, the Inquiry sought various documents and information relevant to Phases 2 and 3 of the Inquiry's proceedings. In particular, the Inquiry sought documents / information under the following headings / themes:

11.1.1 Horizon Implementation (Requests 1 to 4);

11.1.2 Modifications (Requests 5 to 11);

11.1.3 Training (Requests 12 to 15);

11.1.4 Advice and Assistance (Requests 16 to 20);

11.1.5 Resolving Disputes (Requests 21 to 24);

11.1.6 Recording, Reporting and Fixing Bugs, Errors and Defects (Requests 25 to 26);

11.1.7 Privileged Access Rights (Requests 27 to 28); and

11.1.8 Assurance (Request 29).

11.2 The Inquiry requested that POL provide a response in respect of Requests 1 – 4 and Requests 25 – 29 by 18 March 2022, with a response due in respect of the balance of the requests by 15 April 2022.

Requests with a deadline of 18 March 2022

11.3 POL sought to identify documents responsive to this request by a combination of (i) reviewing known documents (including liaising with Peters & Peters and WBD in relation to the same) with a view to identifying an initial list of potentially responsive materials and (ii) devising and conducting targeted searches across various repositories and manually reviewing documents that were responsive to those searches.

11.4 In order to identify an initial list of potentially responsive materials, and on the basis that the issues captured by the Request No. 10 were also the subject of disclosure in the Group Litigation, POL reviewed each of the Horizon Issues and Common Issues Trial Bundles, as well as each of the witness statements and expert reports prepared in those proceedings, both to identify whether the documents were responsive and should be disclosed to the Inquiry and to identify further materials of potential relevance referred to within those

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documents. POL has produced to the Inquiry all relevant documents identified through this process.

- 11.5 A summary of the targeted searches that POL has conducted to identify documents responsive to Requests 1 – 4 and Requests 25 – 29 is set out below, in each case including a description of the keyword search terms that were applied and the repositories across which these searches were conducted. In large part, due the specific nature of the requests and challenges with identifying individuals at POL who would be likely to hold key responsive materials, the searches were conducted over the entirety of or significant portions of the GLO, CCRC and Inquiry Workspaces, rather than being focused on the mailboxes of specific individuals. All documents that were responsive to these searches were then manually reviewed and, where relevant, produced to the Inquiry (subject to privilege).
- 11.6 Certain of the documents contained material that was subject to legal professional privilege and had accordingly been produced to the Inquiry in redacted form.

No.	Request	Approach
HORIZON IMPLEMENTATION		
1	All minutes of the Major Project Expenditure Committee in which Horizon / the Pathway Project are mentioned.	<ul style="list-style-type: none"> • <u>Repositories searched:</u> (i) GLO Database (ii) Postal museum documents and (iii) Oasis documents⁶ • <u>Date Range:</u> N/A • <u>Search terms:</u> <ol style="list-style-type: none"> 1. "Major Project Expenditure Committee" w/10 "Horizon" or "Pathway" 2. "Major Project Expenditure Committee" AND "Minute" or "Meeting" 3. "MaPEC" w/10 "Horizon" or "Pathway" 4. "MaPEC" AND "Minute" or "Meeting" 5. "Counters Major Project Expenditure Committee" w/10 "Horizon" or "Pathway" 6. "Counters Major Project Expenditure Committee" AND "Minute" or "Meeting" 7. "ComPEC" w/10 "Horizon" or "Pathway" 8. "ComPEC" AND "Minute" or "Meeting"
2	All minutes of the Horizon Post Implementation Review Committee.	<ul style="list-style-type: none"> • <u>Repositories searched:</u> (i) GLO Database (ii) Postal museum Documents (iii) Oasis Documents⁷

⁶ In addition to conducting this Search 1 over the GLO Database and the materials collated from Oasis and the Postal Museum archives, POL also arranged for these searches to be conducted over a CD provided by a member of the POL IT Team, containing various historic POL data and records.

⁷ As above in the case of Request 1 – Search 1, this search was also conducted over the data stored on the CD provided by the POL IT Team.

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No.	Request	Approach
		<ul style="list-style-type: none"> • <u>Date range</u>: 1999 – 2021⁸ • <u>Search terms</u>: <ul style="list-style-type: none"> ○ "Horizon Post Implementation Review Committee" ○ "HPIRC" ○ "PIR" AND "1999" ○ "PIR" AND "2000" ○ "PIR" AND "2001" ○ "Horizon" AND "Review Committee" • <u>Search 2</u> • <u>Repositories searched</u>: GLO Database • <u>Date Range</u>: N/A • <u>Search terms</u>: <ul style="list-style-type: none"> ○ "HPIRC" AND "Minute" ○ "HPIRC" AND "Meeting" ○ "PIR" AND "1999" AND "Minute" ○ "PIR" AND "2000" AND "Minute" ○ "PIR" AND "2001" AND "Minute" • <u>Other search parameters</u>: Search limited to Microsoft Word and PDF documents only.
3	The Post Office Business Impact Analysis of Horizon conducted in August 1999.	<ul style="list-style-type: none"> • <u>Repositories searched</u>: (i) GLO Database, (ii) Postal Museum Documents, (iii) Oasis Documents • <u>Date range</u>: August 1999 – December 1999 • <u>Search terms</u>: <ul style="list-style-type: none"> ○ "Business Impact Analysis" AND "Horizon" ○ "Impact Analysis" AND "Horizon"
4	Any internal audit reports on Horizon during the period 1999 – 2002.	<ul style="list-style-type: none"> • <u>Repositories searched</u>: (i) GLO Database (ii) Postal museum Documents and (iii) Oasis Documents ⁹ • <u>Date range</u>: 1999 – 2002 • <u>Search terms</u>:

⁸ Due to the limited metadata available for hard copy documents located at the Oasis and Postal Museum archives, it was not possible to search these materials by reference to a specific date range. Accordingly, this search was conducted across the entire suite of Oasis and Postal museum documents, rather than simply those falling within the relevant date range.

⁹ As above in the case of Request 1 – Search 1 and Request 2 – Search 1, this search has also been conducted over the data stored on the CD provided by the POL IT Team.

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No.	Request	Approach
		<ul style="list-style-type: none"> ○ "audit report" w/10 "Horizon" ○ "Audit" w/10 "Horizon" ○ "review" w/10 "Horizon" ○ "report" w/10 "Horizon" ○ "analysis" w/10 "Horizon" ○ "assessment" w/10 "Horizon" ○ "assurance" w/10 "Horizon"
RECORDING, REPORTING AND FIXING BUGS, ERRORS AND DEFECTS		
25A	Any reports, records or investigations (whether produced by POL, Fujitsu or a third party) relating to ... the <u>Receipts and Payments Mismatch Bug</u> .	<p><u>Search 1</u></p> <ul style="list-style-type: none"> • <u>Repositories searched</u>: (i) CCRC Database and (ii) Inquiry Database • <u>Date range</u>: N/A • <u>Search terms</u>: <ul style="list-style-type: none"> ○ "PC0204263" or "PC0204765" or "PC0203864" <p><u>Search 2</u></p> <ul style="list-style-type: none"> • <u>Repositories searched</u>: (i) GLO Database • <u>Date range</u>: N/A • <u>Search terms</u>: <ul style="list-style-type: none"> ○ "PC0204263" or "PC0204765" or "PC0203864"
25B	Any reports, records or investigations (whether produced by POL, Fujitsu or a third party) relating to ... the <u>Calendar Square Bug</u> .	<p><u>Search 1</u></p> <ul style="list-style-type: none"> • <u>Repositories searched</u>: (i) CCRC Database and (ii) Inquiry Database • <u>Date range</u>: N/A • <u>Search terms</u>: <ul style="list-style-type: none"> ○ "PC0126042" or "PC0126376" or "PC0103864" or "PC0116670" or "PC0075892" or "PC0083101" or "PC0086212" or "PC0193012" <p><u>Search 2</u></p> <ul style="list-style-type: none"> • <u>Repositories searched</u>: (i) GLO Database • <u>Date range</u>: N/A • <u>Search terms</u>:

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No.	Request	Approach
		<ul style="list-style-type: none"> ○ "PC0126042" or "PC0126376" or "PC0103864" or "PC0116670" or "PC0075892" or "PC0083101" or "PC0086212" or "PC0193012"
25C	Any reports, records or investigations (whether produced by POL, Fujitsu or a third party) relating to ... the <u>Suspense Account Bug</u> .	<p><u>Search 1</u></p> <ul style="list-style-type: none"> • <u>Repositories searched</u>: (i) CCRC Database and (ii) Inquiry Database • <u>Date range</u>: N/A • <u>Search terms</u>: <ul style="list-style-type: none"> ○ "PC0223870" <p><u>Search 2</u></p> <ul style="list-style-type: none"> • <u>Repositories searched</u>: (i) GLO Database • <u>Date range</u>: N/A • <u>Search terms</u>: <ul style="list-style-type: none"> ○ "PC0223870"
25D	Any reports, records or investigations (whether produced by POL, Fujitsu or a third party) relating to ... the <u>Dalmellington Bug</u> .	<p><u>Search 1</u></p> <ul style="list-style-type: none"> • <u>Repositories searched</u>: (i) CCRC Database and (ii) Inquiry Database • <u>Date range</u>: N/A • <u>Search terms</u>: <ul style="list-style-type: none"> ○ "PC0246949" or "PC0247207" <p><u>Search 2</u></p> <ul style="list-style-type: none"> • <u>Repositories searched</u>: (i) GLO Database • <u>Date range</u>: N/A • <u>Search terms</u>: <ul style="list-style-type: none"> ○ "PC0246949" or "PC0247207"
25E	Any reports, records or investigations (whether produced by POL, Fujitsu or a third party) relating to ... the <u>Data Tree Build Failure discrepancies</u> .	<p><u>Search 1</u></p> <ul style="list-style-type: none"> • <u>Repositories searched</u>: (i) CCRC Database and (ii) Inquiry Database • <u>Date range</u>: N/A • <u>Search terms</u>: <ul style="list-style-type: none"> ○ "PC0033128" or "PC0132133" or "PC0144386" or "PC0121925" or "PC0123319" or "PC0046811" or "PC0055964" or "PC0058161"

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No.	Request	Approach
		<p><u>Search 2</u></p> <ul style="list-style-type: none"> • <u>Repositories searched:</u> (i) GLO Database • <u>Date range:</u> N/A • <u>Search terms:</u> <ul style="list-style-type: none"> ○ "PC0033128" or "PC0132133" or "PC0144386" or "PC0121925" or "PC0123319" or "PC0046811" or "PC0055964" or "PC0058161"
25F	Any reports, records or investigations (whether produced by POL, Fujitsu or a third party) relating to ... <u>Phantom Transactions</u> .	<p><u>Search 1</u></p> <ul style="list-style-type: none"> • <u>Repositories searched:</u> (i) CCRC Database and (ii) Inquiry Database • <u>Date range:</u> N/A • <u>Search terms:</u> <ul style="list-style-type: none"> ○ "PC0065021" or "PC0065021" or "PC0052025" <p><u>Search 2</u></p> <ul style="list-style-type: none"> • <u>Repositories searched:</u> (i) GLO Database • <u>Date range:</u> N/A • <u>Search terms:</u> <ul style="list-style-type: none"> ○ "PC0065021" or "PC0065021" or "PC0052025"
26	Any reports, records or reviews (whether produced by POL, Fujitsu or a third party) relating to the rectification of the bugs, errors or defects identified at Question 25.	See above – "Search 1 for Request 25A to 25F". These searches were also conducted over the entire GLO Database, and responsive documents were manually reviewed.
PRIVILEGED ACCESS RIGHTS		
27	Any reports, records or investigations which address the extent of permissions or privileged access rights granted to Fujitsu personnel.	<ul style="list-style-type: none"> • <u>Repositories searched:</u> (i) CCRC Database, (ii) Inquiry Database and (iii) GLO Database • <u>Date range:</u> N/A • <u>Search terms:</u> <ul style="list-style-type: none"> ○ ("permission*" or "access right*" or "privileged user*" or "access privilege" or "remote access") AND ("balancing

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No.	Request	Approach
		<p>transaction" or "BT") AND ("software support centre" or "SSC") AND "99.12"</p> <ul style="list-style-type: none"> o ("access right*" or "privileged user*" or "access privilege" or "remote access") AND "BRDB" AND ("session data" or "transaction data")
28	Any briefings, reports or other records relating to changes which were made to the permissions or privileged access rights granted to Fujitsu personnel as a result of or in connection with PEAK PC0208119.	<ul style="list-style-type: none"> • <u>Repositories searched</u>: (i) CCRC Database, (ii) Inquiry Database and (iii) GLO Database • <u>Date range</u>: N/A • <u>Search terms</u>: <ul style="list-style-type: none"> o "PC0208119" o "PEAK" w/10 "0208119" o "208119"
ASSURANCE		
29A	Any audit or assurance reports produced after the adoption of Horizon which addressed ... the <u>existence and extent of bugs, errors and defects in Horizon.</u>	<p>Search 1</p> <ul style="list-style-type: none"> • <u>Repositories searched</u>: (i) CCRC Database, (ii) Inquiry Database, (iii) GLO Database • <u>Date range</u>: N/A • <u>Search terms</u>: <ul style="list-style-type: none"> o ("Audit Report" or "Assurance Report") w/10 ("Horizon" or "HNG*") • <u>Other search parameters</u>: Search limited to Microsoft Word, PDF and Powerpoint documents. <p>Search 2</p> <ul style="list-style-type: none"> • <u>Repositories searched</u>: (i) CCRC Database, (ii) Inquiry Database and (iii) GLO Database • <u>Date range</u>: N/A • <u>Search terms</u>: <ul style="list-style-type: none"> o "Internal Audit and Risk Management" w/10 ("report" or "audit" or "review" or "executive summary" or "investigation" or "briefing" or "presentation") • <u>Other search parameters</u>: Search limited to Microsoft Word, PDF and Powerpoint documents. <p>Search 3</p>
29B	Any audit or assurance reports produced after the adoption of Horizon which addressed ... the <u>ability of bugs, errors and defects to cause shortfalls and discrepancies in branch accounts.</u>	
29C	Any audit or assurance reports produced after the adoption of Horizon which addressed ... the <u>extent to which shortfalls were caused by bugs, errors and defects in Horizon.</u>	
29D	Any audit or assurance reports produced after the adoption of Horizon which addressed ... the <u>ability of errors in data entry and branch accounting procedures, in data transfer and processing, in reference</u>	

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No.	Request	Approach
	<u>data and in third party data to cause discrepancies in branch accounts.</u>	<ul style="list-style-type: none"> <u>Repositories searched</u>: GLO Database – Custodians: (i) Lesley Sewell, (ii) Mike Young and (iii) Rob Houghton ¹⁰
29E	Any audit or assurance reports produced after the adoption of Horizon which addressed ... the <u>extent to which such errors caused discrepancies in branch accounts.</u>	<ul style="list-style-type: none"> <u>Date range</u>: N/A <u>Search terms</u>: <ul style="list-style-type: none"> ("Report" or "Audit" or "Assurance" or "Investigation") w/10 ("Horizon" or "HNG**")
29F	Any audit or assurance reports produced after the adoption of Horizon which addressed ... the <u>limited extent of the reports and transactions data available in branch to SPMs, managers and assistants.</u>	<p><u>Search 4</u></p> <ul style="list-style-type: none"> <u>Mailbox searched</u>: Simon Oldnall <u>Date range</u>: January 2020 to Present <u>Search terms</u>: <ul style="list-style-type: none"> ("Report" or "Audit" or "Assurance" or "Investigation") w/10 ("Horizon" or "HNG**")
29G	Any audit or assurance reports produced after the adoption of Horizon which addressed ... the <u>inability of SPMs, managers and assistants to access transactions and to identify the causes of shortfalls and discrepancies.</u>	<p><u>Search 5</u></p> <ul style="list-style-type: none"> <u>Mailbox searched</u>: Horizon IT Team <u>Date range</u>: N/A <u>Search terms</u>: <ul style="list-style-type: none"> ("Report" or "Audit" or "Assurance" or "Investigation") w/10 ("Horizon" or "HNG**")
29H	Any audit or assurance reports produced after the adoption of Horizon which addressed ... the <u>reliability or robustness of Horizon and / or the integrity of its data.</u>	<p><u>Search 6</u></p> <ul style="list-style-type: none"> <u>Mailbox searched</u>: Andrew Perkins ¹¹ <u>Date range</u>: N/A <u>Search terms</u>: <ul style="list-style-type: none"> ("Report" or "Audit" or "Assurance" or "Investigation") w/10 ("Horizon" or "HNG**")

¹⁰ The GLO Database is filterable by reference to the data that had been harvested in respect of certain custodians or from certain repositories. For the purpose of conducting this Request 29 – Search 3, POL arranged for all of the materials that were harvested from each of Lesley Sewell, Mike Young and Rob Houghton (all former POL Chief Information Officers) in the context of the GLO to be collated and then arranged for the above search to be conducted across these materials only (rather than the entirety of the GLO Database).

¹¹ A full mailbox harvest has not yet been conducted in respect of Andrew Perkins. However, POL has harvested a number of documents for which Mr Perkins was the custodian. For completeness, POL has arranged for this Request 29 – Search 6 to be conducted across these materials.

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- 11.7 Following production to the Inquiry on 18 March 2022, POL conducted the following further search and review exercises in respect of this request.
- 11.7.1 **Postal Museum and Oasis documents:** As explained in HSF's letter of 18 March 2022, further searches were conducted at the Oasis and Postal Museum archives, which POL considered may hold documents relevant to this request. Documents that were identified as being potentially responsive from a review of and searches across the relevant indices were scanned and uploaded to Relativity.
- 11.7.2 For the avoidance of doubt, POL conducted a full manual review of each of the documents recently collated from the Oasis archives and uploaded onto Relativity for responsiveness to Request No. 10. To the extent that any of the searches listed in the above table were conducted over documents collated from the Postal Museum archives prior to these supplemental materials being uploaded to Relativity, these searches have been repeated over the more comprehensive set of Postal Museum documents. All documents that were responsive to the search terms were manually reviewed, and documents identified as responsive were produced to the Inquiry.
- 11.7.3 **Technology Assisted Review:** In HSF's letter of 18 March 2022, POL explained that it was considering deploying Technology / Computer Assisted Review in order to identify any further documents that were responsive to this request (and, in particular, documents responsive to Requests 25 – 29).
- 11.7.4 The approach adopted by POL was to identify a core population of key responsive documents for each of Requests 25 – 29 from the documents produced by POL to the Inquiry on 18 March 2022. From that core population of documents, POL deployed functionality within Relativity to identify "clusters" of conceptually similar documents, over which POL then conducted searches. Documents which were identified by Relativity as being highly likely to be of a similar type to the core population of documents were manually reviewed and responsive documents were produced to the Inquiry.
- 11.7.5 **Documents held by Third Party Advisers:** HSF's letter of 18 March 2022 explained that POL had written to each of Deloitte, KPMG and Ernst & Young (each of which had previously been engaged by POL in various capacities) to request

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that they provide a complete record of the materials prepared during the course of their respective engagements for POL, as well as copies of the same.

- (A) Deloitte: Deloitte provided copies of the documents requested in advance of the 18 March 2022 deadline, which POL manually reviewed. Responsive documents were produced to the Inquiry on 18 March 2022.
- (B) KPMG: KPMG provided copies of the documents requested on 6 May 2022, which POL manually reviewed. Responsive documents were produced to the Inquiry on 12 May 2022.
- (C) Ernst & Young: As explained in HSF's letter dated 12 May 2022, Ernst & Young has declined to provide the requested information and documents.

11.7.6 **Repeated CCRC Searches**: As explained in HSF's letter of 14 April 2022, it became apparent that a substantial volume of materials stored in the CCRC Database were missing extracted text (with the impact that these documents would not have been caught by any of the targeted searches that had been conducted across the CCRC Database). This issue was rectified and all searches previously conducted over the entire CCRC Database were repeated, and responsive documents were manually reviewed. Responsive documents were produced to the Inquiry on 14 April 2022.

Requests with a deadline of 15 April 2022

11.8 In response to a number of the requests listed below (in particular, requests 5, 7, 12, 13, 14, 16, 17, 18, 20, 21, 22 and 23), POL provided a narrative response to the Inquiry, in a number of cases together with supporting documents. POL has not set out in the below table the steps that it followed to identify and collate the documents that informed and were produced with those narrative responses. Please let us know if the Inquiry would be assisted receiving this information. Where the request was for the provision of documents (specifically, requests 6, 8, 9, 10, 11, 15, 19 and 24), POL sets out the approach it adopted to identify and produce these materials to the Inquiry.

No.	Request	Approach
MODIFICATIONS		
5	Who was responsible for decision-making in relation to the 2005 IMPACT Programme ("IMPACT")	<p>Narrative response provided to the Inquiry, together with supporting documents. Supporting documents (and documents that informed this narrative response) were identified as follows:</p> <ul style="list-style-type: none"> Conducting a keyword search for "IMPACT", or "Impact Programme" or "Improved Accounting" across the board minutes stored on the Inquiry Database, and manually reviewing responsive documents created in or around 2004-2006.

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No.	Request	Approach
		<ul style="list-style-type: none"> • Conducting a search for "IMPACT" within the Horizon Issues Trial Bundle, and manually reviewing responsive documents. • Conducting a keyword search for ("IMPACT" AND "Improved Accounting") across the Inquiry Database, and manually reviewing a sample of responsive documents. • Conducting a keyword search for ("Design Authority" AND "IMPACT") across the Inquiry Database, and manually reviewing responsive documents. • Conducting keyword searches for ("Saunders Narayan" AND "IMPACT") or ("Torstein Godeseth" AND "IMPACT") across the Inquiry Database, and manually reviewing responsive documents. • Conducting an interview with Andrew Perkins (POL).
6A	<p><u>The following documents of relevance to IMPACT:</u></p> <p>Any reports or briefings addressing the rationale for IMPACT;</p>	<p><u>Repositories searched:</u> (i) Inquiry Database, (ii) GLO Database</p> <p><u>Search terms:</u></p> <ul style="list-style-type: none"> • ("IMPACT" w/2 "Programme") AND "report" AND "business case" AND "2005" • ("IMPACT" w/2 "Programme") AND "Corbett"
6B	Any notes or records of the collaborative workshops between POL, Fujitsu and the Prism Alliance;	<p><u>Repositories searched:</u> (i) Inquiry Database, (ii) GLO Database</p> <p><u>Search terms:</u></p> <ul style="list-style-type: none"> • "IMPACT" AND "workshop" AND "Prism Alliance" AND "Fujitsu"
6C	The Conceptual Design documents;	<p><u>Repositories searched:</u> (i) Inquiry Database, (ii) GLO Database</p> <p><u>Search terms:</u></p> <ul style="list-style-type: none"> • ("IMPACT" w/2 "Programme") AND "conceptual design"
6D	Any written consultation or other input obtained from stakeholder organisations and individuals, such as the NFSP and SPMs;	<p><u>Repositories searched:</u> (i) Inquiry Database, (ii) GLO Database</p> <p><u>Search terms:</u></p>

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No.	Request	Approach
		<ul style="list-style-type: none"> • ("IMPACT" w/2 "Programme") AND "consultation" AND "NFSP" • ("IMPACT" w/2 "Programme") AND "consultation" AND "SPMs"
6E	Any reviews or assessments of the anticipated or actual effect of IMPACT upon SPMs;	<u>Repositories searched:</u> (i) Inquiry Database, (ii) GLO Database <u>Search terms:</u> <ul style="list-style-type: none"> • "IMPACT" AND ("effect" w/5 "SPM")
6F	Any testing completion reports and / or post implementation reviews;	<u>Repositories searched:</u> (i) Inquiry Database, (ii) GLO Database <u>Search terms:</u> <ul style="list-style-type: none"> • ("IMPACT" w/2 "Programme") AND "completion report" • ("IMPACT" w/2 "Programme") AND "post implementation review"
6G	Any notifications, guidance or instructions given to SPMs following the implementation of IMPACT.	<u>Repositories searched:</u> (i) Inquiry Database, (ii) GLO Database <u>Search terms:</u> <ul style="list-style-type: none"> • ("IMPACT" w/2 "Programme") AND "guidance" AND "2005"
7	Who was responsible for decision-making in relation to the migration to Horizon Online in 2010.	<p>Narrative response provided to the Inquiry, together with supporting documents. Supporting documents (and documents that informed this narrative response) were identified as follows:</p> <ul style="list-style-type: none"> • Conducting a search for "Horizon Online" across the Horizon Issues Judgment and Horizon Issues Trial bundle. • Conducting the following keyword searches across the Inquiry Database, and manually reviewing responsive documents: <ul style="list-style-type: none"> ○ "HNG-X Application" w/8 "roll out" (limited to documents dated 2009 – 2010) ○ "joint release authorisation board" AND "HNG-X" (limited to documents from 2010) ○ "Perkins" AND "Horizon Online" AND "Acceptance Manager" AND "2010" ○ "HNG-X Acceptance Gateway 4"

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No.	Request	Approach
		<ul style="list-style-type: none"> ○ "HNG-X Programme Manager" (limited to documents from 2010) ○ "HNG-X Design Authority" (limited to documents from 2010) ○ "POL Acceptance Manager" (limited to documents from 2010) ○ "Post Office Account HNG-X Reviewers/Approvers Role Matrix" ○ "HNG-X Operational Test Plan – Joint Working Document" ○ "HNG-X Capacity Management and Business Volumes" ○ "HNG-X Testing Strategy" ○ "HNG-X Release Management Procedure" ○ "HNG-X Generic Acceptance Process"
8	<p>Please provide any reports, notes or briefings addressing:</p> <ul style="list-style-type: none"> a. the rationale for migration to Horizon Online; b. the problems identified during the pilot of Horizon Online; c. the decision to suspend the high volume pilot of Horizon Online; d. the decision to accept and to roll out Horizon Online. 	<p><u>Repositories searched:</u> (i) Inquiry Database, (ii) GLO Database</p> <p><u>Search Terms:</u> See below.</p>
8A	The rationale for migration to Horizon Online.	<p><u>Search terms:</u></p> <ul style="list-style-type: none"> • ("Horizon Online" w/10 "migration") AND ("reduction" w/4 "costs") • ("Horizon Online" w/10 "migration") AND "business case"
8B	The problems identified during the pilot of Horizon Online.	<p><u>Search terms:</u></p> <ul style="list-style-type: none"> • "Horizon Online" AND "pilot" AND "red alert"
8C	The decision to suspend the high volume pilot of Horizon Online.	<p><u>Search terms:</u></p> <ul style="list-style-type: none"> • "Horizon Online" AND "pilot" AND "suspen*" AND ("April" w/3 "2010")

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No.	Request	Approach
8D	The decision to accept and to roll out Horizon Online.	<u>Search terms:</u> <ul style="list-style-type: none"> • "Horizon Online" AND "Release Authorisation Board" AND "roll out"
9	Any records of consultations or other input obtained from stakeholder organisations and individuals, such as the NFSP and SPMs in relation to the migration to Horizon Online.	<u>Search terms:</u> <ul style="list-style-type: none"> • ("Horizon Online" w/10 "migration") AND "consultation" AND "NFSP" • ("Horizon Online" w/10 "migration") AND "consultation" AND "SPM"
10	Any reviews or assessments of the anticipated or actual effect upon SPMs of the migration to Horizon Online.	<u>Search terms:</u> <ul style="list-style-type: none"> • ("Horizon Online" w/10 "migration") AND "assessment" AND "SPM" • ("Horizon Online" w/10 "migration") AND "review" AND "SPM"
11	Any notifications, guidance or instructions given to SPMs following the implementation of Horizon Online.	<u>Search terms:</u> <ul style="list-style-type: none"> • ("Horizon Online" w/10 "guidance") AND "2010" • "Horizon Online" AND ("instructions" w/4 "SPM") • "Horizon Online" AND "user manual" AND "2010"
TRAINING		

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No.	Request	Approach
12	<p>Details of the training given to SPMs, managers and assistants in relation to the use and operation of Horizon since the commencement of the national roll out. This was requested to include the following details:</p> <ol style="list-style-type: none"> Where, when and by whom the training was provided; The form, content and duration of the training; What (if any) provision was made for additional training if requested; What (if any) provision was made for additional training when significant changes or modifications were made to Horizon; Any changes or improvements made in the provision of training. 	<p>Narrative response provided to the Inquiry, together with supporting documents.</p> <p><u>Documents and Repositories:</u></p> <p>POL has conducted a manual review of each of the following documents:</p> <ul style="list-style-type: none"> Documents saved on POL's Training SharePoint Site (Current and Archive); Documents embedded in POL's Training Library document; GLO documents tagged by WBD as responsive to "Training" and containing the term "Horizon"; GLO documents tagged by WBD as responsive to "Information available to SPMR" and containing the term "Horizon"; Documents identified as being potentially relevant to training in the GLO bundles following a review of the GLO bundle indices; Documents relating to training which were disclosed in the <i>Baker and others v Post Office Limited</i> (as identified by WBD); 4x CD Roms and hardcopy documents held and identified by POL employee Andrew Perkins; Documents provided by POL's Internal Audit team following a manual review of their index of internal audits; and Documents held in the Oasis archives which were identified following a manual review of the indices. <p><u>Mailboxes</u></p> <p>The following keyword searches were run over the mailboxes of the below individuals for Word, PDF, PowerPoint and Excel documents:</p> <ul style="list-style-type: none"> Alina Lingard Maree Young Tracy Marshall Pam Heap Anita Turner Amanda Jones

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No.	Request	Approach																												
		<ul style="list-style-type: none">"Branch Compliance" shared mailbox"Land Design Team" shared mailbox"Ops Training Design" shared mailbox <table><tr><th>No.</th><th>Search</th></tr><tr><td>1</td><td>("job description" or "JD") AND ("QAL T" or "FSA" or "Trainer" or "Adviser")</td></tr><tr><td>2</td><td>("Horizon" AND "Trainer*") w/10 "qualification"</td></tr><tr><td>3</td><td>("Horizon" AND "Trainer*") w/10 "experience"</td></tr><tr><td>4</td><td>"Horizon" AND "Session Brief"</td></tr><tr><td>5</td><td>"Horizon" AND "Trainer Brief"</td></tr><tr><td>6</td><td>"Horizon" AND "Counter Skills Training"</td></tr><tr><td>7</td><td>"Horizon" AND "Trainer Pack"</td></tr><tr><td>8</td><td>"Horizon" AND "Classroom Trainer Notes"</td></tr><tr><td>9</td><td>"Balancing with Horizon"</td></tr><tr><td>10</td><td>"National Roll Out" AND "Train"</td></tr><tr><td>11</td><td>"Horizon" w/5 "Operations Manual"</td></tr><tr><td>12</td><td>"Horizon" w/10 "Training"</td></tr><tr><td>13</td><td>"Horizon" w/10 "Trainer"</td></tr></table>	No.	Search	1	("job description" or "JD") AND ("QAL T" or "FSA" or "Trainer" or "Adviser")	2	("Horizon" AND "Trainer*") w/10 "qualification"	3	("Horizon" AND "Trainer*") w/10 "experience"	4	"Horizon" AND "Session Brief"	5	"Horizon" AND "Trainer Brief"	6	"Horizon" AND "Counter Skills Training"	7	"Horizon" AND "Trainer Pack"	8	"Horizon" AND "Classroom Trainer Notes"	9	"Balancing with Horizon"	10	"National Roll Out" AND "Train"	11	"Horizon" w/5 "Operations Manual"	12	"Horizon" w/10 "Training"	13	"Horizon" w/10 "Trainer"
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1	("job description" or "JD") AND ("QAL T" or "FSA" or "Trainer" or "Adviser")																													
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13	"Horizon" w/10 "Trainer"																													
13	Details of any guidance, training or instructions given to those responsible for delivering training.	Narrative response provided to the Inquiry, together with supporting documents. Please see the searches described at Q12 above.																												
14	Details of the experience and qualifications of those responsible for delivering training.	Narrative response provided to the Inquiry, together with supporting documents. Please see the searches described at Q12 above.																												
15	Any reports, reviews or investigations (produced by POL or by an external firm on POL's behalf) which address the quality of the training provided to SPMs, managers and assistants in	<u>Documents and Repositories:</u> POL manually reviewed each of the following categories of documents: <ul style="list-style-type: none">Documents saved on POL's Training SharePoint Site (Current and Archive)																												

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No.	Request	Approach												
	relation to the use and operation of Horizon.	<ul style="list-style-type: none">GLO documents tagged by WBD as responsive to "Training" and containing the term "Horizon";GLO documents tagged by WBD as responsive to "Information available to SPMR" and containing the term "Horizon"; <p><u>Mailboxes</u></p> <p>The following keyword searches were conducted over the mailboxes of each of the following individuals for Word, Pdf, PowerPoint and Excel documents:</p> <ul style="list-style-type: none">Alina LingardMaree YoungTracy MarshallPam HeapAnita TurnerAmanda Jones"Branch Compliance" shared mailbox"Land Design Team" shared mailbox"Ops Training Design" shared mailbox <table><tr><th>No.</th><th>Search</th></tr><tr><td>1</td><td>"Horizon" AND "Train*" AND "Restructure"</td></tr><tr><td>2</td><td>"Horizon" AND "Train*" AND "Review"</td></tr><tr><td>3</td><td>"Horizon" AND "Train*" AND "Report"</td></tr><tr><td>4</td><td>"Horizon" AND "Train*" AND "Investigation"</td></tr><tr><td>5</td><td>"Horizon" AND "Train*" and "Audit"</td></tr></table> <p>Keyword searches 1 to 4 resulted in a very large number of responsive documents. In order to reduce this number so that the documents could be manually reviewed, the following further keyword searches were conducted and only the documents that were responsive to those searches were manually reviewed: "Train*" w/10 ("Report" or "Review" or "Investigation").</p>	No.	Search	1	"Horizon" AND "Train*" AND "Restructure"	2	"Horizon" AND "Train*" AND "Review"	3	"Horizon" AND "Train*" AND "Report"	4	"Horizon" AND "Train*" AND "Investigation"	5	"Horizon" AND "Train*" and "Audit"
No.	Search													
1	"Horizon" AND "Train*" AND "Restructure"													
2	"Horizon" AND "Train*" AND "Review"													
3	"Horizon" AND "Train*" AND "Report"													
4	"Horizon" AND "Train*" AND "Investigation"													
5	"Horizon" AND "Train*" and "Audit"													
ADVICE AND ASSISTANCE														

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No.	Request	Approach
16	Details of any guidance, training or instructions given to those responsible for operating the Network Business Support Helpline ("Helpline") since the commencement of the national roll out.	<p>Narrative response provided to the Inquiry, together with supporting documents.</p> <p>Current training materials were obtained from the BSC training manager (Nigel Davies). Available training materials from the pre-Separation period were obtained from Kendra Dickinson and consent was obtained from RMG for their disclosure to the Inquiry. The customer service training materials referred to in the response were obtained from Jo Milton.</p> <p>To identify Knowledge Base Articles ("KBAs"), as well as other guidance and instruction documents, searches were carried out over documents disclosed in the Group Litigation proceedings with the tags "<i>NBSC</i>" or "<i>KBA</i>s". POL conducted a keyword search for "<i>Horizon</i>" or "<i>discrepanc*</i>" or "<i>shortfall</i>" and all keyword responsive documents were manually reviewed.</p> <p>A SharePoint site called "<i>NBSC KBA</i>", referred to in the Annex to POL's letter of 14 April 2022, was also harvested. POL conducted a keyword search for "<i>Horizon</i>" or "<i>discrepanc*</i>" or "<i>shortfall</i>" or "<i>transaction correction</i>", with a date range filter of 01 August 2019 – 01 June 2021. All documents responsive to this search were manually reviewed.</p> <p>The text of the current KBAs stored on Dynamics was exported into an excel spreadsheet. Keyword searches for "<i>Horizon</i>" or "<i>discrepancy</i>" or "<i>shortfall</i>" or "<i>transaction correction</i>" were conducted, and the text of all keyword responsive KBAs was manually reviewed.</p>
17	Details of the experience and qualifications of those responsible for operating the Helpline.	<p>Narrative response provided to the Inquiry, together with supporting documents.</p> <p>POL conducted the following keyword searches over the mailboxes of Kendra Dickinson, Mel Fischer and Angela van den Bogerd:</p> <ul style="list-style-type: none"> • "<i>helpline</i>" w/10 "<i>experience</i>" • "<i>helpline</i>" w/10 "<i>qualification</i>" • "<i>helpline</i>" w/10 "<i>job description</i>" • "<i>helpline</i>" w/10 "<i>JD</i>" • "<i>BSC</i>" w/10 "<i>experience</i>" • "<i>BSC</i>" w/10 "<i>qualification</i>"

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No.	Request	Approach
		<ul style="list-style-type: none"> • "BSC" w/10 "job description " • "BSC" w/10 "JD" <p>All keyword responsive documents were manually reviewed.</p>
18	Who has been responsible for producing and reviewing the contents of the Horizon Help tool since its introduction and provide details of their experience and qualifications.	<p>Narrative response provided to the Inquiry, together with supporting documents.</p> <p>POL conducted the following keyword searches over the mailbox of Alina Lingard:</p> <ul style="list-style-type: none"> • "Horizon Online Help" AND "responsib*" AND "experience" • "Horizon Online Help" AND "responsib*" AND "qualification" • "Horizon Online Help" AND "responsib*" AND "job description" • "Horizon Online Help" AND "responsib*" AND "JD" • "Horizon Help" AND "responsib*" AND "experience" • "Horizon Help" AND "responsib*" AND "qualification" • "Horizon Help" AND "responsib*" AND "job description" • "Horizon Help" AND "responsib*" AND "JD" <p>All keyword responsive documents were manually reviewed.</p>
19	Any reports, reviews or investigations (produced by POL or by an external firm on POL's behalf) which address the quality of the advice and assistance provided via the Helpline and / or the Horizon Help tool.	<p>In relation to the <u>Helpline</u>, POL conducted the following keyword searches over the mailboxes of Mel Fischer, Jo Milton and Angela Van Den Bogerd:</p> <ul style="list-style-type: none"> • "helpline" w/10 "review" • "helpline" w/10 "report" • "helpline" w/10 "investigation" • "helpline" w/10 "audit" • "helpline" w/10 "Barclay partnership" • "helpline" w/10 "McKinsey" • "helpline" w/10 "Deloitte" • "helpline" w/10 "Brand Biology"

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No.	Request	Approach
		<ul style="list-style-type: none"> • "helpline" w/10 "First Friday" • "BSC" w/10 "review" • "BSC" w/10 "qualification" • "BSC" w/10 "investigation" • "BSC" w/10 "audit" • "BSC" w/10 "Barclay partnership" • "BSC" w/10 "McKinsey" • "BSC" w/10 "Deloitte" • "BSC" w/10 "Brand Biology" • "BSC" w/10 "First Friday" <p>All responsive documents were manually reviewed. The searches were also repeated over the mailbox of Kendra Dickinson, albeit within five words (w/5) rather than within 10 words (w/10). All responsive documents were manually reviewed.</p> <p>In relation to the Horizon Help tool, POL conducted the following keyword searches across the mailboxes of Alina Lingard, Jo Milton and Angela Van Den Bogerd:</p> <ul style="list-style-type: none"> • "Horizon Online Help" w/10 "review" • "Horizon Online Help" w/10 "report" • "Horizon Online Help" w/10 "investigation" • "Horizon Online Help" w/10 "audit" • "Horizon Help" w/10 "review" • "Horizon Help" w/10 "report" • "Horizon Help" w/10 "investigation" • "Horizon Help" w/10 "audit" • "Enhanced User Help Support" (<u>Note</u>: This search was carried out over Angela van den Bogerd's mailbox only, on the basis that Ms van den Bogerd had sponsored this discontinued initiative to update the Horizon Help function). <p>All keyword responsive documents were manually reviewed, and responsive documents were produced to the Inquiry.</p>
20	Details of any other sources of advice and assistance available to SPMs, managers and assistants	Narrative response provided to the Inquiry.

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No.	Request	Approach
	on the use and operation of Horizon since the commencement of the national roll out.	
RESOLVING DISPUTES		
21A	<u>Who was responsible, from the commencement of the national roll out, for:</u> responding to concerns or complaints about discrepancies and shortfalls which were reported to the Helpline;	Narrative response provided to the Inquiry.
21B	investigating discrepancies or shortfalls which could not be resolved by the Helpline;	Narrative response provided to the Inquiry.
21C	undertaking enquiries into disputed error notices or transactions corrections.	Narrative response provided to the Inquiry.
22	Details of their experience and qualifications (to the extent not already covered by Q.17 above).	<p>Narrative response provided to the Inquiry, together with supporting documents.</p> <ul style="list-style-type: none"> • <u>Repositories</u>: Mailboxes of Alison Clark, Tracy Marshall and Rod Ismay. • <u>Search Terms</u>: <ul style="list-style-type: none"> - "CV" AND ("financial service* centre" or "FSC" or "P&BA" or "product* and branch account*" or "product* & branch account*") - "job description" AND ("financial service* centre" or "FSC" or "P&BA" or "product*") and (branch account*" or "product* & branch account*") - "JD" AND ("financial service* centre" or "FSC" or "P&BA" or "product*") AND (branch account*" or "product* & branch account*") <p>All keyword responsive documents were manually reviewed.</p>
23	Details of any guidance, training or instructions they were given. This request includes (but is not limited to) any guidance, training or instruction concerning:	<p>Narrative response provided to the Inquiry, together with supporting documents.</p> <p><u>Search 1</u></p> <ul style="list-style-type: none"> • <u>Repositories</u>: Documents disclosed in the GLO and tagged by WBD for "10. NBSC" or "26. KBAs".

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No.	Request	Approach
	<p>a. the length and scope of the investigations or enquiries which ought to be undertaken;</p> <p>b. the circumstances in which an ARQ request for audit data ought to be made;</p> <p>c. the circumstances in which a disputed shortfall or discrepancy ought to be placed into the central suspense account pending investigation.</p>	<ul style="list-style-type: none"> <u>Search Terms</u>: "Horizon" or "discrepanc*" or "Shortfall" <p><u>Search 2</u></p> <ul style="list-style-type: none"> <u>Repositories</u>: Documents disclosed in the GLO and tagged by WBD for "08. Shortfalls". <u>Search Terms</u>: No search terms applied. All documents reviewed. <p><u>Search 3</u></p> <ul style="list-style-type: none"> <u>Repositories</u>: Documents disclosed in the GLO and tagged by WBD for "07.Transaction Corrections" and "18. Transaction Corrections". <u>Search Terms</u>: No search terms applied. All documents reviewed. <p><u>Search 4</u></p> <ul style="list-style-type: none"> <u>Repositories</u>: Documents disclosed in the GLO and tagged by WBD for "13. Suspense Accounts". <u>Search Terms</u>: No search terms applied. All documents reviewed. <p><u>Search 5</u></p> <ul style="list-style-type: none"> <u>Repositories</u>: Mailboxes of Alison Clark, Tracy Marshall and Rod Ismay <u>Search Terms</u>: <ul style="list-style-type: none"> "train*" w/10 ("shortfall" or "discrepanc*" or "transaction correction" or "TC" or "error notice" or "financial service* centre" or "FSC") "workshop" w/10 ("shortfall" or "discrepanc*" or "transaction correction" or "TC" or "error notice" or "financial service* centre" or "FSC") "manual" w/10 ("shortfall" or "discrepanc*" or "transaction correction" or "TC" or "error notice" or "financial service* centre" or "FSC") "policy" w/10 ("shortfall" or "discrepanc*" or "transaction correction" or "TC" or "error notice" or "financial service* centre" or "FSC") <p>All keyword responsive documents were manually reviewed.</p>
24	Any reports, reviews or investigations (produced by POL or by an external firm on POL's behalf) which address the quality of the investigations undertaken into dispute shortfalls,	<p><u>Search 1</u></p> <ul style="list-style-type: none"> <u>Repositories</u>: Documents disclosed in the GLO and tagged by WBD for "10. NBSC" or "26. KBAs". <u>Search Terms</u>: "Horizon" or "discrepanc*" or "Shortfall"

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No.	Request	Approach
	discrepancies and transaction corrections.	<p><u>Search 2</u></p> <ul style="list-style-type: none"> • <u>Repositories:</u> Documents disclosed in the GLO and tagged by WBD for "08. Shortfalls". • <u>Search Terms:</u> No search terms applied. All documents reviewed. <p><u>Search 3</u></p> <ul style="list-style-type: none"> • <u>Repositories:</u> Documents disclosed in the GLO and tagged by WBD for "07.Transaction Corrections" and "18. Transaction Corrections". • <u>Search Terms:</u> No search terms applied. All documents reviewed. <p><u>Search 4</u></p> <ul style="list-style-type: none"> • <u>Repositories:</u> GLO Database, Mailboxes of Alison Clark, Tracy Marshall, Rod Ismay and Jessica Madron. • <u>Search Terms:</u> <ul style="list-style-type: none"> - ("investigation" or "report" or "review") w/10 "relationship manager" - ("investigation" or "report" or "review") w/10 "FSC" - ("investigation" or "report" or "review") w/10 "P&BA" - ("investigation" or "report" or "review") w/10 "transaction correction" - ("investigation" or "report" or "review") w/10 "Business Support" - ("investigation" or "report" or "review") w/10 "financ* service* centre" - ("investigation" or "report" or "review") w/10 "SSRT" - ("investigation" or "report" or "review") w/10 "product* and branch account**" - ("investigation" or "report" or "review") w/10 ("dispute" w/10 ("discrepanc*" or "shortfall")) <p>All keyword responsive documents were manually reviewed and documents responsive to the request were produced to the Inquiry.</p>

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11.9 Documents responsive to Request 10 were originally produced to the Inquiry on 18 March 2022. Supplemental productions in respect of Request No. 10 were provided to the Inquiry on 14 April 2022, 29 April 2022, 6 May 2022 and 12 May 2022. Across these productions, POL has produced a total of **10,284** relevant documents.

12. RULE 9 REQUEST NO. 11 (28 FEBRUARY 2022) – DOCUMENTS REFERRED TO IN BOARD / SUB-COMMITTEE MINUTES

12.1 By its Request No. 11, the Inquiry sought various documents and information referred to in the minutes of the POL Board and the Audit, Risk and Compliance Sub-Committee which were previously produced to the Inquiry. The Inquiry requested that POL provide a response by **31 March 2022**.

12.2 POL has located and produced to the Inquiry the majority of documents responsive to the request. In some cases, these documents were identified without needing to conduct broad search and review exercises (including, for example, where documents were located on the Company Secretary SharePoint). Where POL was unable easily to locate the requested document or where the request was for multiple documents and initial enquiries / investigations did not appear to have identified a comprehensive set of responsive materials, supplemental searches were devised and conducted to address these gaps.

12.3 The below table provides an overview of the supplemental searches that POL conducted and the repositories over which the searches were conducted. Where POL produced the requested document to the Inquiry, the relevant production ID is set out below.

No.	Relevant Meeting	Request	Approach
1	1 September 2004 POL Board	Horizon IT Roadmap	Document produced to the Inquiry (POL- 0027041)
2	23 February 2005 POL Board	<p>A. Presentation concerning the "Next Generation of Horizon"</p> <p>B. Business case that would be presented at the April board meeting</p>	<p>A. Document produced to the Inquiry (POL- 0027042)</p> <p>B. In order to identify a copy of the "Business case" presented at the April board meeting, POL conducted the following searches across the materials that have to date been collected from Postal Museum and Oasis archives:</p> <ul style="list-style-type: none"> - <u>Search Terms:</u> "Horizon" AND "Next Generation" AND ("business case" or "update" or "strategy") - <u>Date Range:</u> N/A

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No.	Relevant Meeting	Request	Approach
			Responsive documents were manually reviewed and no responsive documents were identified.
3	19 October 2005 POL Board	Strategy Paper for noting at the RMG Board meeting in December 2005	<p>In order to identify and locate a copy of the "Strategy Paper" for noting at the RMG Board meeting held in December 2005, POL conducted the following searches across all of the materials that have to date been collected from the Postal Museum and Oasis archives:</p> <ul style="list-style-type: none"> - <u>Search Terms</u>: "Horizon" AND ("strategy" w/20 ("paper" or "update")) - <u>Date Range</u>: N/A <p>Responsive documents were manually reviewed and no responsive documents were identified.</p>
4	22 March 2006 POL Risk and Compliance Committee	Cotemporaneous documents which formed the basis of the update that was provided to the Committee in relation to "high value branch losses"	<p>POL produced to the Inquiry a number of documents in response to this request. In order to identify potentially relevant materials, POL conducted the following searches across all of the materials that have to date been collected from the Postal Museum and Oasis archives:</p> <ul style="list-style-type: none"> - <u>Search Terms</u>: "Horizon" AND ("strategy" w/20 ("paper" or "update")) - <u>Date Range</u>: N/A <p>All responsive documents were manually reviewed.</p> <p>As set out in Annex I to HSF's letter to the Inquiry dated 31 March 2022, given the limits on the pre-2012 documents to which POL continues to have access, it seems unlikely that these documents represent a complete set of the relevant documents.</p>

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No.	Relevant Meeting	Request	Approach
5	20 April 2006 POL Board	Paper presented to Board which would be taken to RMG Board meeting on 27 April 2006	Document produced to the Inquiry (POL-0027014).
6	6 September 2006 POL Risk and Compliance Committee	<p>A. Contemporaneous documents which formed the basis of the update that was provided to the Committee in relation to "branch audit diagnostics"</p> <p>B. Documents created to "ascertain if there are any common profiles"</p>	<p>A. In order to identify copies of contemporaneous documents which formed the basis for the update that was provided to the POL Risk and Compliance committee in relation to "branch audit diagnostics", POL conducted the following searches across the materials that have to date been collected from the Postal Museum and Oasis archives:</p> <ul style="list-style-type: none"> - <u>Search Terms:</u> ("branch" w/10 "audit") AND ("diagnostics" or "update") - <u>Date Range:</u> N/A <p>Responsive documents were manually reviewed and no responsive documents were identified.</p> <p>B. In order to identify copies of any documents created to ascertain if there are any "common profiles", POL conducted the following searches across the materials that have to date been collected from the Postal Museum and Oasis archives:</p> <ul style="list-style-type: none"> - <u>Search Terms:</u> ("branch" w/20 "audit") AND ("financial irregularity" or "losses" or "common") - <u>Date Range:</u> N/A <p>Responsive documents were manually reviewed and no responsive documents were identified.</p>

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No.	Relevant Meeting	Request	Approach
7	26 March 2008 POL Risk and Compliance Committee	Scoping documents prepared in relation to the splitting of types of former Subpostmaster losses to provide greater clarity between fraud losses and other losses.	<p>In order to identify and locate copies of the requested "scoping documents" referred to in the minutes of the 26 March 2008 meeting of the POL Risk and Compliance Committee, POL has conducted the following search across the materials that had at that time been harvested from the Postal Museum and Oasis archives:</p> <ul style="list-style-type: none"> - <u>Search Terms</u>: "postmaster" AND "losses" AND "fraud" - <u>Date Range</u>: N/A <p>Responsive documents were manually reviewed. One relevant document was identified and produced to the Inquiry (POL-0027833).</p> <p>As set out in Annex I to HSF's letter to the Inquiry dated 31 March 2022, given the limits on the pre-2012 documents to which POL continues to have access, it seems unlikely that this document represents a complete set of the relevant documents.</p>
8	22 September 2011 POL Board	Paper addressing a Technology Update including tactical and strategic relationship with Fujitsu	Documents produced to the Inquiry (POL-0027072 and POL-0027073).
9	15 March 2012 POL Board	Paper entitled "Horizon Update"	Document produced to the Inquiry (POL-0027074).
10	23 May 2012 POL Board	Noting paper on the Fujitsu Services Review of Horizon Online	Document produced to the Inquiry (POL-0027075 and POL-0027081).
11	21 May 2013 POL Board	Update on the Horizon position with the Second Sight Review	Document produced to the Inquiry (POL-0027150).
12	25 September 2013	Horizon Progress Report	POL considers that it has located

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No.	Relevant Meeting	Request	Approach
	POL Board		<p>(and produced to the Inquiry) a copy of the Horizon Progress Report (POL-0027548). The search parameters that were applied in order to identify this document are set out below:</p> <ul style="list-style-type: none"> - <u>Mailboxes</u>: Susan Crichton and Chris Aujard - <u>Search Terms</u>: ("Horizon" or "HNG") AND ("Progress" or "Report" or "Update") - <u>Date Range</u>: 15 September 2013 to 25 September 2013 <p>All responsive documents were manually reviewed.</p>
13	19 November 2013 ARC Committee	Notes prepared for or resulting from GC update re approach to prosecutions	<p>POL produced to the Inquiry various documents responsive to this request. In order to identify these materials, POL conducted the following searches across the entire mailbox of Chris Aujard (POL's General Counsel in November 2013):</p> <ul style="list-style-type: none"> - <u>Search Terms</u>: "Prosecution" AND ("Policy" or "Approach") - <u>Date Range</u>: 1 November 2013 – 21 January 2014 <p>All responsive documents were manually reviewed.</p> <p>As set out in Annex I to HSF's letter to the Inquiry dated 31 March 2022, in some cases, it is not immediately clear whether these documents are in fact notes specifically prepared for or resulting from the update provided by Mr Aujard, but POL has nonetheless produced copies of these documents to the Inquiry.</p>
14	27 November 2013 POL Board	Progress Report on Project Sparrow	Document produced to the Inquiry (POL-0027180).

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No.	Relevant Meeting	Request	Approach
15	11 February 2014 ARC Committee	<p>A. Report which outlined the proposed changes to the prosecution policy</p> <p>B. Paper explaining the most appropriate ways to communicate the prosecutions policy</p> <p>C. All iterations of the prosecution policy from 1999 (to the extent in POL's custody and control)</p>	<p>A. Document produced to the Inquiry (POL-0027375).</p> <p>B. Document produced to the Inquiry (POL-0027193).</p> <p>C. POL produced approximately 400 documents in response to the Inquiry's request for all iterations of the prosecution policy from 1999 to date. In order to identify these materials, the following search was conducted over all of the materials which POL had at that time harvested from the Postal Museum and Oasis archives:</p> <ul style="list-style-type: none"> - <u>Search Terms</u>: "Policy" AND ("Investigat*" or "Prosecut*" or "Whistle") - <u>Date Range</u>: N/A <p>In addition to conducting searches across the materials collated from the Postal Museum and Oasis archives, POL also arranged for the following search to be conducted across the entire POHIT and CCRC databases.</p> <ul style="list-style-type: none"> - <u>Search Terms</u>: ("Investigat*" or "Prosecut*") w/10 ("Policy") - <u>Date Range</u>: N/A - <u>Other parameters</u>: Review limited to Microsoft Word and PDF documents only. <p>All responsive documents were manually reviewed.</p> <p>As set out in Annex I to HSF's letter to the Inquiry dated 31 March 2022, POL is unable to confirm that it has located all versions of the prosecution policy. POL provided in Annex I</p>

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No.	Relevant Meeting	Request	Approach
			to HSF's letter to the Inquiry dated 31 March 2022 a complete list of the dated versions of the prosecution policy which POL has produced to the Inquiry. POL also produced a number of draft and undated policies, as well as certain other documents which relate to the prosecution policies.
16	26 February 2014 POL Board	Report on the challenges facing the ICRMS	Document produced to the Inquiry (POL-0027196).
17	26 March 2014 POL Board	<p>A. "Legal report" to the Board</p> <p>B. One page "lessons learned" document</p>	<p>A. Document produced to the Inquiry (POL- 0027203).</p> <p>B. POL considers that it has located (and produced to the Inquiry) a copy of the "lessons learned" document referred to in the minutes of the POL Board Meeting held on 26 March 2014 (POL-0027210). The search parameters that were applied in order to identify this document are set out below:</p> <ul style="list-style-type: none"> - <u>Mailbox</u>: Belinda Crowe - <u>Search Terms</u>: "lesson" AND "learned" - <u>Date Range</u>: 26 March 2014 – 30 April 2014 <p>All responsive documents were manually reviewed.</p>
18	30 April 2014 POL Board	Draft Report / Review from Deloitte (and final version of the same, to the extent not produced)	Document produced to the Inquiry (POL-0027216). This document was also produced to the Inquiry in response to Request No. 10.
19	10 June 2014 POL Board	Update on the Sparrow Sub-Committee	Document produced to the Inquiry (POL-0027215).

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No.	Relevant Meeting	Request	Approach
20	25 June 2014 POL Board	Update on the ICRMS	Document produced to the Inquiry (POL-0027202).
21	2 July 2015 POL Board	Paper on the Fujitsu contract extension	Document produced to the Inquiry (POL-0027237).
22	15 July 2015 POL Board	Briefing on Project Sparrow for the Chairman	Document produced to the Inquiry (POL-0027239).
23	9 February 2016 POL Board	Paper addressing the extension of the Horizon contract	Document located and produced to the Inquiry (POL-0027436).
24	19 May 2016 ARC Committee	Minutes of a discussion with external auditors (shown in separate appendix)	Document produced to the Inquiry (POL-0027288).
25	24 May 2016 POL Board	Report on the Postmaster litigation	Document produced to the Inquiry (POL-0027370).
26	28 March 2017 POL Board	Project Sparrow Report	As set out in HSF's letter to the Inquiry dated 31 March 2022, no written report was prepared in advance of the 28 March 2017 meeting of the POL Board in relation to Project Sparrow, with only a verbal update provided.
27	18 May 2017 ARC Committee	Note circulated by GC updating the ARC on the funding of the Postmasters' action	POL considers that it has located and produced to the Inquiry a copy of the note prepared by the POL General Counsel (Jane MacLeod) in relation to the funding of the Postmaster's action, as referred to in the minutes of the meeting of the ARC Committee held on 18 May 2017 (POL-0027300). The search parameters that were applied in order to identify this document are set out below: - <u>Mailbox</u> : Jane MacLeod

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No.	Relevant Meeting	Request	Approach
			<ul style="list-style-type: none"> - <u>Search Terms</u>: "Postmaster" AND "Funding" AND "Litigation" - <u>Date Range</u>: 18 May 2017 – 25 September 2017 <p>All responsive documents were manually reviewed.</p>
28	31 July 2018 POL Board	Contingency planning paper relating to the postmaster litigation	Document produced to the Inquiry (POL-0027379).
29	20 March 2019 POL Board	<p>A. Paper setting out the background to recusal and other issues</p> <p>B. A phased plan covering operational, financial and reputational issues</p> <p>C. A summary of previous investigations into Horizon</p> <p>D. The "critical analysis" document</p>	<p>A. Document produced to the Inquiry (POL-0027397).</p> <p>B. POL has located and produced to the Inquiry copies of various documents in response to its request for a copy of the "phased plan covering operation, financial and reputational issues" (POL-0027351, POL-0027353 and POL-0027355). In order to identify these materials, POL conducted the following searches across the entire mailboxes of (i) Al Cameron (POL Chief Financial Officer), (ii) Tim Parker (POL Chairman) and (iii) Jane MacLeod (POL General Counsel in March 2019):</p> <ul style="list-style-type: none"> - <u>Search Terms</u>: ("phase" w/10 "plan") or ("operation*" AND "financ*" AND "reputation*") - <u>Date Range</u>: 15 March 2019 to 30 March 2019 <p>All responsive documents were manually reviewed.</p> <p>C. POL considers that it has located and produced to the Inquiry a copy of the note</p>

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			<p>summarising the previous investigations into Horizon, as referred to in the minutes of the meeting of the POL Board held on 20 March 2019 (POL-0027349). The search parameters that were applied in order to identify these materials are set out below:</p> <ul style="list-style-type: none"> - <u>Mailboxes</u>: Jane MacLeod - <u>Search Terms</u>: ("Summary" or "Report" or "Update") AND "Horizon" AND ("Investigat*" or "audit" or "review") - <u>Date Range</u>: 15 March 2019 to 15 April 2019 <p>All responsive documents were manually reviewed.</p> <p>D. POL has not located a copy the "critical analysis" document referred to in the minutes of the meeting of the POL Board held on 20 March 2019. In order to attempt to locate this document, the following search was conducted across the entire mailbox of Jane MacLeod (POL's General Counsel at the relevant times and the individual that was tasked with preparing the update):</p> <ul style="list-style-type: none"> - <u>Search Terms</u>: ("Analysis" or "Review" or "Improv*") AND "Postmaster" AND "Horizon" - <u>Date Range</u>: 20 March 2019 to 1 September 2019 <p>All responsive documents were manually reviewed.</p> <p>POL notes that the minutes of the POL Board meeting held on 20 March 2019 refer to the</p>

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			<p>"critical analysis" in the following terms (at Section 5, Point 6): <i>"We need to carry out a <u>critical analysis</u> for ourselves. For example, what did we need to do to be the right partner for Postmasters"</i> [emphasis added]. It is not clear from this description whether the "critical analysis" was in fact prepared. On the basis that the item was marked for the attention of Jane MacLeod (JM), it is likely that a copy of this document (to the extent prepared) will have been sent to or from Jane MacLeod. As explained above, the searches that POL conducted over Jane MacLeod's mailbox did not result in the identification of this document.</p>
30	28 May 2019 POL Board	Group litigation update	Document produced to the Inquiry (POL-0027369).
31	22 September 2020 ARC Committee	"Law and trends" paper	As explained in HSF's letter to the Inquiry dated 6 April 2022, this document (POL-0027427) was subject to legal professional privilege and had been produced to the Inquiry in error. That letter requested that the Inquiry delete this document from its Relativity platform and confirmed that POL did not consider the document to be relevant to the Inquiry's Terms of Reference.
32	23 September 2019 POL Board	Paper on the Group litigation	Document produced to the Inquiry (POL-0027368).
33	29 October 2019 POL Board	Paper on the Group litigation	Document produced to the Inquiry (POL-0027367). HSF's letter of 6 April 2022 explained that an updated version of this document was produced to the Inquiry on 6

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No.	Relevant Meeting	Request	Approach
			April 2022, with additional redactions applied (POL-0027564). HSF's letter of 6 April 2022 requested that the Inquiry arrange for the version of this document provided on 31 March 2022 to be deleted from its Relativity platform.
34	26 November 2019 POL Board	Paper that was before the Board concerning a group litigation update	Document produced to the Inquiry (POL-0027366).
35	8 April 2020 POL Board	<p>A. Paper on the post-GLO Implementation plan</p> <p>B. Table of criticisms</p>	<p>A. POL located a copy of the post-GLO implementation plan referred to in the minutes of the meeting of the POL Board held on 8 April 2020. As explained in HSF's letter to the Inquiry dated 31 March 2022, this document was authored jointly by Herbert Smith Freehills and Peters & Peters, and is subject to legal professional privilege. This document has not therefore been produced to the Inquiry.</p> <p>B. POL produced to the Inquiry copies of various documents in response to its request for a copy of the "table of criticisms" referred to in the minutes of the meeting of the POL Board held on 8 April 2020. In order to identify these and other potentially relevant materials, POL conducted the following searches across the entire POHIT Database:</p> <p><u>Search Terms:</u></p> <ul style="list-style-type: none"> - "criticism" AND "improvement" AND "lifecycle" AND "agent" AND "HIJ" AND "CIJ" - "Adverse comments" AND "Common Issues Judgment"

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No.	Relevant Meeting	Request	Approach
			<ul style="list-style-type: none"> - "Fraser J" AND "Criticism" AND "CIJ" - "Table of criticisms" - ("HIJ" or "CIJ") AND "Criticism" AND "Julie Thomas" - ("Table" w/5 "Criticism") <p><u>Date Range:</u> N/A</p> <p>The following search was conducted across the HSF Database:</p> <p><u>Search Terms:</u> "table" AND "criticism" AND "Julie" AND "Thomas"</p> <p><u>Date Range:</u> N/a</p> <p>All responsive documents were manually reviewed.</p>
36	21 May 2020 POL Board	Correspondence between Tim Parker and the Minister	Document produced to the Inquiry (POL-0027586). As explained in HSF's letter of 6 April 2022, this document contains redactions for legal professional privilege.
37	25 June 2020 POL Board	<p>A. Paper on Contracts Approach</p> <p>B. Paper on KELS which was presented to the Group Executive</p>	<p>A. Document produced to the Inquiry (POL-0027380). As explained in HSF's letter of 6 April 2022, an updated version of this document was produced to the Inquiry on 6 April 2022, with additional redactions applied (POL-0027565). HSF's letter of 6 April 2022 requested that the Inquiry arrange for the version of this document provided on 31 March to be deleted from its Relativity platform.</p> <p>B. Documents produced to the Inquiry (POL-0027566).</p>
38	30 June 2020 POL Board	A. Paper on Fujitsu Contract/SPM -	A. Document produced to the Inquiry (POL-0027430).

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No.	Relevant Meeting	Request	Approach
		B. Paper on Post GLO Settlement Programme Update	B. Document produced to the Inquiry (POL-0027430).
39	28 July 2020 POL Board	Paper on post-GLO implementation plan	Document produced to the Inquiry (POL-0027431).
40	27 August 2020 POL Board	Costs Paper relation to the GLO action	Document produced to the Inquiry (POL-0027386).
41	22 September 2020 POL Board	Post-GLO implementation plan and historical matters business unit report	Documents produced to the Inquiry (POL-0027236 and POL-0027238).
42	1 October 2020 POL Board	Various papers presented to the Board	POL has located copies of the papers that were presented to the POL Board at the meeting held on 1 October 2020. As explained in HSF's letter to the Inquiry dated 31 March 2022, these papers were authored jointly by Herbert Smith Freehills and Peters & Peters, and are subject to legal professional privilege. They have not therefore been produced to the Inquiry.
43	8 October 2020 POL Board	Paper on de minimis payments	Document produced to the Inquiry (POL-0027400).
44	19 November 2020 POL Board	Business case that was provided to BEIS	Document produced to the Inquiry (POL-0027013).
45	24 November 2020 ARC Committee	A. Paper concerning suspense accounts B. All drafts of the KPMG report referred to in the minutes which were shared with POL	A. POL considers that it has produced to the Inquiry a copy of the paper concerning "suspense accounts" and referred to at the meeting of the ARC Committee held on 24 November 2020 (POL-0027389). The search parameters that were applied in order to identify these materials are set out below: - <u>Mailbox</u> : Mark Underwood

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No.	Relevant Meeting	Request	Approach
			<ul style="list-style-type: none"> - <u>Search Terms</u>: "suspense" AND "account" AND "KPMG" - <u>Date Range</u>: 10 November 2020 to 24 November 2020 <p>All responsive documents were manually reviewed.</p> <p>B. POL produced to the Inquiry the final version of the KPMG report referred to in the minutes of the meeting of the ARC Committee held on 24 November 2020 (POL-0027391). Whilst POL has located earlier drafts of this Report, these drafts are marked as privileged and have not therefore been produced to the Inquiry. The search parameters that were applied in order to identify these materials are set out below:</p> <ul style="list-style-type: none"> - <u>Mailbox</u>: Mark Underwood - <u>Search Terms</u>: ("Suspense Account Review" AND "KPMG" AND "Project King" and "Draft") or ("Statement of Work" AND "16 October 2020") - <u>Date Range</u>: 16 October 2020 to 31 January 2021 <p>All responsive documents were manually reviewed.</p>
46	26 January 2021 ARC Committee	<p>A. Copy of POL Investigations Policy (together with all iterations of the same since 1999 that are within POL's custody and control)</p> <p>B. Paper on branch losses and balances on Postmaster accounts</p>	<p>A. POL produced approximately 260 documents in response to the Inquiry's request for all iterations of the investigations policy from 1999 to date. In order to identify these materials, the following search was conducted over all of the materials which POL had at that time harvested from the Postal Museum and Oasis archives:</p>

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No.	Relevant Meeting	Request	Approach
		<p>C. Paper on Postmaster Policies (concerning the policies that had been proposed to address points arising from CIJ)</p>	<ul style="list-style-type: none"> - <u>Search Terms</u>: "Policy" AND ("Investigat*" or "Prosecut*" or "Whistle") - <u>Date Range</u>: N/A <p>All responsive documents were manually reviewed.</p> <p>In addition to conducting searches across the materials collated from the Postal Museum and Oasis archives, POL also arranged for the following search to be conducted across the entire POHIT and CCRC databases.</p> <ul style="list-style-type: none"> - <u>Search Terms</u>: ("Investigat*" or "Prosecut*") w/10 ("Policy") - <u>Date Range</u>: N/A - <u>Other parameters</u>: Review limited to Microsoft Word and PDF documents only. <p>All responsive documents were manually reviewed.</p> <p>As set out in Annex I to HSF's letter to the Inquiry dated 31 March 2022, POL is unable to confirm whether it has located all versions of the investigations policy. For completeness, and in case of assistance to the Inquiry, POL also produced a number of draft and undated policies, as well as certain other documents which relate to the investigation policies.</p> <p>B. Document produced to the Inquiry (POL-0027395).</p> <p>C. Document produced to the Inquiry (POL-0027570).</p>

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No.	Relevant Meeting	Request	Approach
47	25 February 2021 POL Board	<p>A. Letter received from the CCRC on 23 February 2021</p> <p>B. Correspondence sent in reply to 23 February 2021 letter</p>	<p>A. Document produced to the Inquiry (POL-0027477).</p> <p>B. Document produced to the Inquiry (POL-0027478).</p>
48	30 March 2021 ARC Committee	<p>A. Paper on Postmaster policies</p> <p>B. Paper on Law & Trends</p> <p>C. Postmaster Complaints Handling Policy</p> <p>D. Network Transaction Corrections Policy</p> <p>E. Network Cash and Stock Management Policy</p> <p>F. Postmaster Termination Decision Review Policy</p> <p>G. Postmaster Onboarding Policy</p> <p>H. Postmaster Training Policy</p> <p>I. Guide to Policy Standards for Postmasters</p> <p>J. The Whistleblowing Policy</p> <p>K. All previous version of the above policies since 2000</p>	<p>A. Document produced to the Inquiry (POL-0027432).</p> <p>B. Document produced to the Inquiry (POL-0027573).</p> <p>C. Document produced to the Inquiry (POL-0027406). As explained in HSF's letter to the Inquiry dated 31 March 2022, this is an internal policy which was introduced in 2020/21, such that historic versions will not be available.</p> <p>D. Document produced to the Inquiry (POL-0027405). As explained in HSF's letter of 31 March 2022, this policy was introduced in 2020/21, such that historic versions will not be available. In case of assistance to the Inquiry, POL also produced certain related documents, including a copy of the "Transaction Correction Process Overview" (POL-0027503), which provides a summary of the process for dealing with Transaction Corrections prior to the introduction of the Network Transaction Corrections Policy, a copy of the "Overarching Losses Policy" (POL-0027044), which was effective from April 2006, along with 7 other peripherally relevant documents.</p> <p>E. Document produced to the</p>

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			<p>Inquiry (POL-0027404). As explained in HSF's letter to the Inquiry dated 31 March 2022, this policy was introduced in 2020/21, such that historic versions will not be available.</p> <p>F. Document produced to the Inquiry (POL-0027572). As explained in HSF's letter to the Inquiry dated 31 March 2022, this policy was introduced in 2020/21, such that historic versions will not be available.</p> <p>G. Document produced to the Inquiry (POL-0027407). As explained in HSF's letter to the Inquiry dated 31 March 2022, this policy was introduced in 2020/21, such that historic versions will not be available.</p> <p>H. Document produced to the Inquiry (POL-0027408). As explained in HSF's letter to the Inquiry dated 31 March 2022, this policy was introduced in 2020/21, such that historic versions will not be available.</p> <p>I. Document produced to the Inquiry (POL-0027403). As explained in HSF's letter of 31 March 2022, POL has also produced a copy of the approved version of this document (POL-0027497).</p> <p>J. Document produced to the Inquiry (POL-0027472).</p> <p>K. POL produced approximately 45 documents in response to the Inquiry's request for all iterations of the whistleblowing policy from 2000 to date, including a number of policy documents that had previously been collated by POL. In order to identify additional policy materials from the pre-</p>
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No.	Relevant Meeting	Request	Approach
			<p>separation period, the following search was conducted over all of the materials which POL had at that time harvested from the Postal Museum and Oasis archives:</p> <ul style="list-style-type: none"> - <u>Search Terms</u>: "Policy" AND ("Investigat*" or "Prosecut*" or "Whistle") - <u>Date Range</u>: N/A <p>All responsive documents were manually reviewed.</p>
49	18 May 2021 ARC Committee	<p>A. Paper on Postmaster Policies</p> <p>B. Any update from Tim Perkins to the Committee on how the policies were working in practice</p> <p>C. Postmaster Contractual Performance Policy</p> <p>D. Postmaster Contract Suspension Policy</p> <p>E. Postmaster Contract Termination Policy</p> <p>F. Accounting Dispute Resolution Policy (Revised)</p> <p>G. All previous versions of the above policies since 2000</p>	<p>A. Document produced to the Inquiry (POL-0027421).</p> <p>B. POL considers that it has located (and produced to the Inquiry) a copy of the update regarding how the policies were working in practice, as referred to at the meeting of the ARC Committee held on 18 May 2021 (POL-0027448). The search parameters that were applied in order to identify these materials are set out below:</p> <ul style="list-style-type: none"> - <u>Mailbox</u>: Tim Perkins - <u>Search Terms</u>: "Postmaster" AND "Polic*" AND ("ARC" or "Audit" or "Committee") - <u>Date Range</u>: 18 May 2021 to Present <p>All responsive documents were manually reviewed.</p> <p>C. Document produced to the Inquiry (POL-0027414). As explained in HSF's letter of 31 March 2022, POL also produced the previous version of this policy which was introduced in the course of 2020</p>

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No.	Relevant Meeting	Request	Approach
			<p>(POL-0027498).</p> <p>D. Document produced to the Inquiry (POL-POL-0027416). As explained in HSF's letter of 31 March 2022, POL also produced the previous version of this policy which was introduced in the course of 2020 (POL-0027499). In case of assistance to the Inquiry, POL also produced a copy of the Precautionary Suspension Policy dated 12 October 2012 (POL-0027528).</p> <p>E. Document produced to the Inquiry (POL- 0027417). As explained in HSF's letter of 31 March 2022, POL also produced the previous version of this policy which was introduced in the course of 2020 (POL-0027496). In case of assistance to the Inquiry, POL also produced certain related documents, including the Resignation to Avoid Summary Termination Policy dated 17 October 2012 (POL-0027529).</p> <p>F. Document produced to the Inquiry (POL-0027415). As explained in HSF's letter of 31 March 2022, POL also produced the previous version of this policy which was introduced in the course of 2020 (POL-0027500).</p> <p>G. As explained above (and in HSF's letter of 31 March 2022), the above policies were introduced in 2020/21 such that no historic versions will be available.</p>

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- 12.4 Following the productions to the Inquiry on 31 March 2022 and 6 April 2022, POL continued to conduct certain further search and review exercises in respect of the request. A brief description in relation to these supplemental reviews is set out below.
- 12.4.1 **Postal Museum and Oasis Documents:** As explained above in the context of POL's response to Request No. 10, POL arranged for supplemental visits to be scheduled to these archives during the course of March 2022 with a view to identifying further hard copy documents which may be responsive to this request.
- 12.4.2 All documents identified following the supplemental visits to the Oasis and Postal Museum archives were scanned and uploaded onto POL's e-Discovery platform.
- (A) To the extent that any of the above searches were conducted over documents collated from the Postal Museum archives, these searches were repeated over the more comprehensive set of Postal Museum documents. All responsive documents were manually reviewed, and documents identified as responsive to the request were produced to the Inquiry.
- (B) POL conducted a full manual review of each of the documents recently collated from the Oasis archives for responsiveness to Request No. 11.
- 12.4.3 **CCRC Documents:** As explained in HSF's letter of 14 April 2022, it became apparent that a substantial volume of materials stored in the CCRC Database were missing extracted text (as a result of which these documents would not have been caught by any of the targeted searches that had been conducted across the CCRC Database). This issue was rectified and all searches previously conducted over the entire CCRC Database were repeated, and responsive documents were manually reviewed. Responsive documents were produced to the Inquiry on 14 April 2022.
- 12.4.4 On 13 May 2022 KPMG confirmed that, when re-running keyword searches over the CCRC database following the resolution of the extracted text issue, approximately 2,000 documents responsive to one of the searches were missed due to a technical error. POL manually reviewed each of these documents and is in a position to produce responsive documents to the Inquiry, once it has been provided with a Quatrix link.
- 12.4.5 **Additional Policy Documents:** In HSF's letter of 31 March 2022, POL explained that, in the case of certain of the policy documents requested under sub-request 48, updated versions of these policy documents had been provided to the Audit, Risk and Compliance Sub-Committee for approval on 29 March 2022 and that POL would provide copies once they had been formally approved. POL produced to the Inquiry copies of each of these newly approved policies on 14 April 2022. POL separately produced an updated version of the Postmaster Guide to Policies (as well as the updated Postmaster Support Guide) on 6 May 2022.

Productions

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- 12.5 Documents were initially produced to the Inquiry on 31 March 2022. Further responsive documents were produced on 6 April 2022, 14 April 2022, and 6 May 2022. Across these productions, POL has produced a total of **978** relevant documents.

13. OTHER PRODUCTIONS

- 13.1 In addition to the disclosures that POL has made in response to Rule 9 requests, POL has also produced to the Inquiry copies of the documents that have to date been provided by POL to Paula Vennells via her legal representatives Mishcon de Reya.
- 13.2 To date, **1,422** documents have been provided to Mishcon de Reya and therefore to the Inquiry. In large part, the documents that POL has provided in response to requests received from Mishcon de Reya have been limited to documents which relate to the period of Ms Vennells' tenure at POL and, in some cases, were identified following targeted searches across various electronic repositories (including, for example, the mailbox of Paula Vennells).
- 13.3 As explained in HSF's letter of 23 May 2022, POL has identified a series of meeting minutes of a Working Group that was established in around 2013 for the purpose of discussing "Horizon Issues" and anticipates that the content of these minutes will be of interest to the Inquiry. HSF's letter of 23 May 2022 explained that POL would produce these documents to the Inquiry following it issuing a Rule 9 request for production of the same.

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SCHEDULE

Rule 9 Request of 26 November 2021

Document Retention and Disclosure Failures

1. Please provide copies of the Advices (in July and August 2013) provided by Simon Clarke to POL on the subject of POL's document retention and disclosure failures ("the Clarke Advices").
2. Please provide copies of all communications passing between POL and Cartwright King LLP relating to the Clarke Advices, including a copy of the instructions to the firm to provide advice and any correspondence between the firm and POL's Board of Directors.

Post-Conviction Review and Disclosure

3. Please provide copies of the review and advice on disclosure performed by Brian Altman QC in October 2013 ("the Altman Review").
4. Please provide copies of any instructions given to Brian Altman QC in his preparation of the Altman Review. If any instructions were provided in conference, please explain what took place at these conferences and provide copies of any notes made.

Second Sight

5. Please provide copies of any formal written external legal advice (i.e. from counsel or solicitors outside) or instructions concerning:
 - a. The findings of the Interim Report dated 8 July 2013
 - b. The findings of the Briefing Report Part One dated 25 July 2014;
 - c. The findings of the Briefing Report Part Two version 1 dated 21 August 2014;
 - d. The findings of the Briefing Report Part Two version 2 dated 9 April 2015;
 - e. The decision by POL to terminate the Second Sight investigation; and
 - f. The decision by POL to request that Second Sight destroy all of the paperwork in their investigation.

The Group Litigation

6. Please provide copies of any formal written external legal advice (i.e. from counsel or solicitors outside of POL) or instructions on the strategy for defending the group litigation in Bates and others v Post Office Limited. In particular, please provide any external advice given:
 - a. At the time that the litigation was first in contemplation in 2015 or 2016;
 - b. At the time the Group Litigation Order was made in March 2017;
 - c. On the approach to be taken and the preparation for the Common Issues trial, including notes of any conferences with witnesses;
 - d. On the legal professional privilege asserted in the Common Issues trial;
 - e. On the application for Mr Justice Fraser to recuse himself;
 - f. On the approach to be taken and the preparation for the Horizon Issues trial, including notes of any conferences with witnesses; and

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- g. On the relevance and POL's control of the Known Error Log.

Board Minutes

- 7. In the Rule 9 request of 3 November 2021 we requested "all board minutes which relate to the Horizon IT system". Please ensure that your response now includes any minutes which relate to the conduct of litigation (if and to the extent that it did not already do so).