

Second Interim Disclosure Statement

18 October 2022

Annex 2 – Approach for responding to Requests No. 12 to No. 23

1. INTRODUCTION

1.1 The purpose of this Annex 2 is to provide an overview of the approach that POL has adopted for responding to Requests No. 12 to Request No. 23 inclusive. POL's approach in relation to Requests No. 1 to Request No. 11 is set out in its First Interim Disclosure Statement dated 27 May 2022.

1.2 Insofar as POL has made supplemental productions in relation to Request No. 1 to Request No. 11 since the date of the First Interim Disclosure Statement, those supplemental productions (and the approach POL has adopted in relation to the same) is also addressed in this Annex 2 (at paragraph 14 below).

2. REQUEST NO. 12

2.1 By its Request No. 12 dated 31 May 2022, the Inquiry requested that POL produce the minutes of the Horizon Issues Working Group (the "**Working Group**") together with copies of all documents referred to in these minutes. This followed HSF's letter of 23 May 2022, by which it alerted the Inquiry to the existence of the Working Group and requested that the Inquiry issue a Rule 9 Request should it wish to receive copies of the same. The Inquiry requested that POL provide its response by no later than 6 June 2022 (*Working Group minutes*) and 28 June 2022 (*Documents referred to in Working Group minutes*).

2.2 In total, POL has produced **212** documents in response to Request No. 12. Relevant documents were provided to the Inquiry 6 June 2022, 28 June 2022, 12 July 2022 and 26 August 2022.

2.3 Working Group Minutes

2.4 On 6 June 2022, POL arranged for copies of the (114) Working Group minutes referred to in HSF's letter of 23 May 2022 (which minutes had been provided to POL by Womble Bond Dickinson) to be produced to the Inquiry.

2.5 On 12 August 2022, HSF wrote to the Inquiry (in relation to Request No. 16), explaining that it had identified eight further sets of Working Group minutes in the period between July and November 2013 which had not previously been produced to the Inquiry. These documents were subsequently produced to the Inquiry on 18 August 2022. HSF's letter of 12 August 2022 also confirmed that POL would conduct further targeted searches and produce any further Working Group minutes identified (or documents referred to within these minutes) by no later than 26 August 2022.

2.6 On 26 August 2022, POL produced one further minute of the Working Group. This document was identified by reference to the following searches, each of which was conducted over the GLO Database, the Inquiry Database and the HSF Database:

2.6.1 "Horizon Issue*" **AND** "attendee*" **AND** "working group"

2.6.2 "Regular Call re Horizon Issues"

2.6.3 "Horizon Weekly Report"

2.7 Documents referred to in Working Group Minutes

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- 2.8 HSF's letter of 6 June 2022 recorded that copies of the documents referred to in the Working Group minutes disclosed to the Inquiry on 6 June would be produced to the Inquiry by 28 June 2022. By HSF's letter of 20 June 2022, POL subsequently requested a short extension to (12 July 2022) for producing certain documents in response to Request No. 12.
- 2.9 On 28 June 2022, POL arranged for an initial tranche of documents referred to in the Working Group minutes disclosed on 6 June 2022 to be produced to the Inquiry. Supplemental productions were subsequently made on 12 July 2022 and 26 August 2022 (including in respect of the additional Working Group minutes identified and produced to the Inquiry on 18 August 2022 and 26 August 2022).
- 2.10 A summary of the searches that POL has conducted in order to identify documents referred to in minutes of the Horizon Issues Working Group is set out below.

No.	Date of Meeting	Documents	Searches
1	19 July 2013	<p>A. Action Points: <i>"Rob to forward statement template and interim measure document to Martin Smith."</i></p> <p>B. Action Points: <i>"Generate a list of past and current cases".</i></p>	<p>Search A:</p> <ul style="list-style-type: none"> - <u>Repository:</u> Rob King mailbox - <u>Search Terms:</u> All emails sent to Martin Smith - <u>Date Range:</u> 19 July 2013 – 31 July 2013 <p>Search B:</p> <ul style="list-style-type: none"> - <u>Repository:</u> Jarnail Singh mailbox, Rodric Williams mailbox - <u>Search Terms:</u> "List" AND "Case*" AND "Horizon" - <u>Date Range:</u> 19 July 2013 – 31 August 2013
2	24 July 2013	Jarnail Singh / Legal: <i>"Confirmed that Rob Wilson from Royal Mail has a list of pre separation prosecutions and will provide this to Jarnail and the list will be up to date by next Wednesdays Meeting."</i>	<p>Search A:</p> <ul style="list-style-type: none"> - <u>Repository:</u> Jarnail Singh mailbox - <u>Search Terms:</u> ("Rob" w/5 "Wilson") - <u>Date Range:</u> 24 July 2013 – 31 July 2013
3	31 July 2013	<p>A. Dave Posnett / Security: Report prepared following TORCH visit.</p> <p>B. Dave Posnett / Security: <i>"Helen Rose completed a report re 'system reversals' on Horizon. These system reversals are normal and correct, but on Horizon and Credence logs these reversals show up as 'existing reversals', implying that the user has performed the reversal."</i></p>	<p>Search A: Not applicable. Document previously produced to the Inquiry.</p> <p>Search B: Not applicable. Document previously produced to the Inquiry.</p> <p>Search C:</p> <ul style="list-style-type: none"> - <u>Repository:</u> Gayle Peacock mailbox, Rod Ismay mailbox - <u>Search Terms:</u> "TOR" or "Terms of Reference" or "Brand Forum"

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No.	Date of Meeting	Documents	Searches
		<p>C. Rod Ismay / FSC: "Mentioned 'Brand Forum' ; Paula driving, Gayle is putting TOR together re support moving forward".</p> <p>D. Rod Ismay / FSC: "FOI request received from FOI desk (to Andy Winn) re Horizon issues."</p> <p>E. Action Points: "Gayle to obtain list of branches via Wincor where engineer has visited, to establish if branches have sustained losses and if the losses have been made good".</p>	<ul style="list-style-type: none"> - <u>Date Range:</u> 31 July 2013 – 31 August 2013 <p>Search D:</p> <ul style="list-style-type: none"> - <u>Repository:</u> Rod Ismay mailbox, Andy Winn mailbox - <u>Search Terms:</u> "FOI*" or ("Freedom" w/5 "Information") or "Request" AND "Horizon" or "HNG" - <u>Date Range:</u> 31 July 2013 – 31 August 2013 <p>Search E:</p> <ul style="list-style-type: none"> - <u>Repository:</u> Gayle Peacock mailbox - <u>Search Terms:</u> "Wincor" - <u>Date Range:</u> 31 July 2013 – 31 August 2013
4	7 August 2013	<p>A. Action Points: "Gayle Peacock to send out TOR re Branch Loss Board."</p> <p>B. Action Points: "Dave Posnett to email Jarnail with details of the 2 contacts with Investigator and cc Rodric and Renata, with the heading 'Subject To Legal Privilege'."</p>	<p>Search A:</p> <ul style="list-style-type: none"> - <u>Repository:</u> Gayle Peacock mailbox - <u>Search Terms:</u> "TOR" or "Terms of Reference" or "Branch Loss Board" - <u>Date Range:</u> 7 August 2013 – 31 August 2013 <p>Search B:</p> <ul style="list-style-type: none"> - <u>Repository:</u> Dave Posnett mailbox, Jarnail Singh mailbox, Rodric Williams mailbox - <u>Search Terms:</u> "Investigator" or "Subject to legal privilege" - <u>Date Range:</u> 7 August 2013 – 31 August 2013
5	14 August 2013	<p>A. Andy Winn / FSC: "Outlined branch in Burnham, where £1,600.00 debt was repaid, but as branch is on the list a letter has been sent saying we'll be returning money subject to outcome of security review."</p> <p>B. Action Points: "John Scott to circulate Wincor list of branches attended by ATM engineer."</p>	<p>Search A:</p> <ul style="list-style-type: none"> - <u>Repository:</u> Andy Winn mailbox - <u>Search Terms:</u> "Burnham" - <u>Date Range:</u> 1 July 2013 – 14 August 2013 <p>Search B:</p> <ul style="list-style-type: none"> - <u>Repository:</u> John Scott mailbox (Note: GLO Workspace) - <u>Search Terms:</u> "Wincor" AND "ATM"

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No.	Date of Meeting	Documents	Searches
			<ul style="list-style-type: none"> - <u>Date Range</u>: 14 August 2013 – 14 September 2013
6	21 August 2013	<p>A. John Scott: <i>"In addition to the minutes of each meeting a matrix document is required to bring all actions and issues on 1 document to provide a clear line of sight."</i></p> <p>B. Rob King – Security: <i>"Terms of reference re Branch Loss Board – sent out by Gail 21/08/13."</i></p> <p>C. Action Points: <i>"Email confirmation of issue to be sent to group by Steve Beddoe."</i></p>	<p>Search A:</p> <ul style="list-style-type: none"> - <u>Repository</u>: Mailboxes of John Scott (GLO), Gayle Peacock, Rodric Williams - <u>Search Terms</u>: ("Horizon" w/2 "Issue") AND "Matrix" - <u>Date Range</u>: 21 August 2013 – 31 December 2013 <p>Search B:</p> <ul style="list-style-type: none"> - <u>Repository</u>: Gayle Peacock mailbox - <u>Search Terms</u>: "Branch" AND "Loss" AND "Board" - <u>Date Range</u>: 20 August 2013 – 22 August 2013 <p>Search C:</p> <ul style="list-style-type: none"> - <u>Repository</u>: Steve Beddoe mailbox - <u>Search Terms</u>: ("Bureau" w/5 "Change") AND "Horizon" - <u>Date Range</u>: 21 August 2013 – 31 August 2013
7	28 August 2013	<p>A. Action Points: <i>"A telephone conference took place between AP, the Security team and JS1 Singh re action point list. Confirming that Matrix drafted."</i></p> <p>B. Action Points: <i>"E-top up issues – AW still investigating and stating that recovery document going out (which had already been planned) with suggested wording to cover the scenario. AW still uncomfortable with this."</i></p> <p>C. ATM Gluing Case: <i>"MS noting sentencing coming up but had requested to put on hold for a month. Look into ATM visitor book to inspect which engineers looked at the ATM and when. Agreed to keep open."</i></p>	<p>Search A:</p> <ul style="list-style-type: none"> - <u>Repository</u>: Jarnail Singh mailbox - <u>Search Terms</u>: ("Matrix" or ("Action" w/5 "List" or "Point") or "Conference") - <u>Date Range</u>: 1 August 2013 – 28 August 2013 <p>Search B:</p> <ul style="list-style-type: none"> - <u>Repository</u>: Andy Winn mailbox, Gayle Peacock mailbox - <u>Search Terms</u>: ("Top-Up" or "Top Up" or "Top-Ups" or "Top Ups") - <u>Date Range</u>: 1 August 2013 – 30 September 2013 <p>Search C: Not applicable. This is the same document searched at 5B above.</p>

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8	4 September 2013	<p>A. Dave Posnett / Security: Report prepared following TORCH visit.</p> <p>B. ATM Gluing: "Call logs to be examined to ascertain if there are any incidents recorded before 3.2012 and to identify any branches visited by engineer."</p> <p>C. E-top up: "GP awaiting update from Steve. Document produced confirming process. GP has sent to Scott in IT&C."</p>	<p>Search A: Not applicable. Document previously produced to the Inquiry.</p> <p>Search B:</p> <ul style="list-style-type: none"> - <u>Repository:</u> Gayle Peacock mailbox, John Scott mailbox (Note: GLO Workspace) - <u>Search Terms:</u> "ATM" AND "Engineer*" AND "Log" - <u>Date Range:</u> 4 September 2013 – 31 October 2013 <p>Search C:</p> <ul style="list-style-type: none"> - <u>Repository:</u> Gayle Peacock mailbox, Steve Beddoe mailbox (Note: GLO Workspace) - <u>Search Terms:</u> (Top-Up*" or "Top Up*") - <u>Date Range:</u> 14 August 2013 – 30 September 2013
9	11 September 2013	Bureau Buy Back: "Service Improvement Enhancements List" - following discussions with Fujitsu, 30 improvements were suggested.	<p>Search A:</p> <ul style="list-style-type: none"> - <u>Repository:</u> Steve Beddoe mailbox - <u>Search Terms:</u> "Service Improvement" AND "Enhancement" - <u>Date Range:</u> September 2013
10	18 September 2013	E-top up: Recovery booklet	<p>Search A:</p> <ul style="list-style-type: none"> - <u>Repository:</u> Gayle Peacock mailbox - <u>Search Terms:</u> "Recovery booklet" AND "E-top up" - <u>Date Range:</u> September 2013
11	25 September 2013	<p>A. Prestbury: 'Disks' from FJ with regard to report into a potential transaction failure.</p> <p>B. Nelson: Ditto.</p> <p>C. Issue identified by GP: 'Document dated 2012', unclear what this relates to. Could be in respect of suspicion about a member of staff, and a policy drafted by Alison Drake.</p>	<p>Search A:</p> <ul style="list-style-type: none"> - <u>Repository:</u> Gayle Peacock mailbox - <u>Search Terms:</u> "Prestbury" AND "Data" - <u>Date Range:</u> September 2013 <p>Search B:</p> <ul style="list-style-type: none"> - <u>Repository:</u> Gayle Peacock mailbox - <u>Search Terms:</u> "Nelson" AND "Data" - <u>Date Range:</u> September 2013

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No.	Date of Meeting	Documents	Searches
			Search C: <ul style="list-style-type: none"> - <u>Repository</u>: Rodric Williams mailbox, Alison Drake mailbox. - <u>Search Terms</u>: "Suspicion" AND "Policy" - <u>Date Range</u>: September 2013
12	23 October 2013	Nelson : ARQ reports - in relation to cash declaration activity, used to identify staff fraud.	Search A: <ul style="list-style-type: none"> - <u>Repository</u>: Gayle Peacock mailbox - <u>Search Terms</u>: "Nelson" AND "ARQ" AND "Report" - <u>Date Range</u>: October 2013
13	21 August 2013	E-top up : 'Document produced confirming process' - sent by Gayle Peacock to 'Scott'.	Search A: <ul style="list-style-type: none"> - <u>Repository</u>: Gayle Peacock mailbox - <u>Search Terms</u>: "E-top up" AND "update" - <u>Date Range</u>: August 2013
14	30 October 2013	<p>A. Stock reconciliation: Mention of a report regarding Swindon not checking pouches due to them lacking Horizon numbers to crosscheck</p> <p>B. Carluka Post Office: Mention of attempts to retrieve papers, from context possibly in respect of criminal proceedings around 2004, but 'proving difficult'. Dealt with by Cartwright King.</p>	Search A: <ul style="list-style-type: none"> - <u>Repository</u>: Jeff Burke mailbox, Horizon IT mailbox, Rod Ismay mailbox - <u>Search Terms</u>: ("Stock" w/5 "reconcil*") AND "pouch*" AND "Swindon" - <u>Date Range</u>: October 2013 Search B: <ul style="list-style-type: none"> - <u>Repository</u>: Cartwright King Files - <u>Search Terms</u>: "Carluka" AND "2004" - <u>Date Range</u>: N/A
15	6 November 2013	<p>A. Post & Go: "Steve sent report to Roger, looks to be operational practices rather than equipment issues."</p> <p>B. Stock reconciliation: "Weaknesses highlighted in report. Scoping with Op team for a 100% check as at the moment only check 10%. Issue around how stock audited and not Horizon. Report matching data</p>	Search A: <ul style="list-style-type: none"> - <u>Repository</u>: Steve Beddoe mailbox - <u>Search Terms</u>: ("Post & Go" or "Post and Go" or "P&G") - <u>Date Range</u>: 20 October 2013 – 6 November 2013 Search B:

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		<p>sets, which is a gap that POL need to close and have been aware of since 2008."</p> <p>C. Lake Post Office: "Rodric Williams in process of looking at draft letter, which will go out this week."</p> <p>D. Action Points: "Horizon desk call logs – Anne to discuss with Andy W on info for all cases"</p>	<ul style="list-style-type: none"> - <u>Repository:</u> Jeff Burke mailbox, Horizon IT mailbox, Rod Ismay mailbox - <u>Search Terms:</u> ("Stock" w/5 "reconcil*") AND "pouch*" AND "Swindon" - <u>Date Range:</u> October 2013 <p>Search C:</p> <ul style="list-style-type: none"> - <u>Repository:</u> Rodric Williams mailbox - <u>Search Terms:</u> "Lake" - <u>Date Range:</u> 1 November 2013 – 20 November 2013 <p>Search D:</p> <ul style="list-style-type: none"> - <u>Repository:</u> Anne Allaker mailbox, Andy Winn mailbox - <u>Search Terms:</u> ("Horizon" or "HNG") AND "Log*") - <u>Date Range:</u> 1 November 2013 – 31 November 2013
16	13 November 2013	Post & Go: Mention of a report being received by Anne Allaker and Gayle Peacock.	<p>Search A:</p> <ul style="list-style-type: none"> - <u>Repository:</u> Gayle Peacock mailbox, Anne Allaker mailbox, Andrew Wise mailbox - <u>Search Terms:</u> ("Post & Go" or "Post and Go") AND "Report" - <u>Date Range:</u> November 2013
17	27 November 2013	Lake: Mention of a letter being sent to solicitors and awaiting approval.	<p>Search A</p> <ul style="list-style-type: none"> - <u>Repository:</u> Andy Winn mailbox, Rodric Williams mailbox - <u>Search Terms:</u> "Lake" AND "ARQ" AND "Report" - <u>Date Range:</u> November 2013 <p>Search B:</p> <ul style="list-style-type: none"> - <u>Repository:</u> HF Database - <u>Search Terms:</u> "Lake" AND "discrepancy" AND "Horizon" - <u>Date Range:</u> N/A

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18	4 December 2013	Blackhall: Mention of seeking clearance to raise ARQ, and a lack of optimism about reports showing anything. No further information provided.	Search A: <ul style="list-style-type: none"> - <u>Repository:</u> Rod Ismay mailbox - <u>Search Terms:</u> "Blackhall" AND "ARQ" AND "Report" - <u>Date Range:</u> December 2013
19	15 January 2014	ATM Gluing Case: Gayle Peacock sending a list of affected ATMs to Rod Williams.	Search A: <ul style="list-style-type: none"> - <u>Repository:</u> Gayle Peacock mailbox, Rodric Williams mailbox - <u>Search Terms:</u> "ATM" w/10 "Glu*" - <u>Date Range:</u> January 2014
20	29 January 2014	Fleckney – DVLA transaction: Mention of 'details of investigation' being sent by Rebecca Barker. Believed to be in association with a known error raised in March 2010.	Search A: <ul style="list-style-type: none"> - <u>Repository:</u> Anne Allaker mailbox, Rebecca Barker mailbox - <u>Search Terms:</u> "Fleckney" AND "DVLA" AND "Transaction" - <u>Date Range:</u> 15 January 2014 – 10 February 2014
21	12 February 2014	Money Gram: Mention of a note about next steps being sent by Craig to Nick Beal re this scam.	Search A: <ul style="list-style-type: none"> - <u>Repository:</u> Rodric Williams mailbox, Nick Beal mailbox - <u>Search Terms:</u> ("Money Gram" or "Moneygram") AND "losses" - <u>Date Range:</u> February 2014
22	19 February 2014	Oaktree and others: Andrew Wise reviewing ARQ. No further information provided.	Search A: <ul style="list-style-type: none"> - <u>Repository:</u> Andy Winn mailbox - <u>Search Terms:</u> "Oaktree" AND "ARQ" AND "Report" - <u>Date Range:</u> February 2014
23	26 February 2014	Post & Go: Mention of a report that has now been produced and forwarded to Jarnail Singh.	Search A: <ul style="list-style-type: none"> - <u>Repository:</u> Jarnail Singh mailbox - <u>Search Terms:</u> ("Post & Go" or "Post and Go") AND "Report" - <u>Date Range:</u> February 2014
24	19 March 2014	Post & Go: "New issues identified" section references report produced by Andrew Wise, specifically paragraph	Search A: <ul style="list-style-type: none"> - <u>Repository:</u> Andrew Wise mailbox

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		headed 'Nottingham Crown Office' which refers to a data loss.	<ul style="list-style-type: none"> - <u>Search Terms</u>: "Nottingham Crown Office" AND ("Data" w/5 "loss") - <u>Date Range</u>: March 2014
25	26 March 2014	Parkstone : Mention of data received from Fujitsu. Gayle Peacock and Anne Allaker set to discuss said data.	Search A: <ul style="list-style-type: none"> - <u>Repository</u>: Gayle Peacock mailbox, Anne Allaker mailbox - <u>Search Terms</u>: "Parkstone" AND "Fujitsu" AND "Data" - <u>Date Range</u>: March 2014
26	2 April 2014	<p>A. Fleckney – DVLA transaction: Mention of a statement being sent to SPM stating that Horizon system is not at fault.</p> <p>B. Blackhall: Andy Winn has sent a recommendation to Rod Ismay. Recommendation is said to be to repay balance to the estate.</p> <p>C. Parkstone: Information received from FJ (no mention of what this relates to), set to be reviewed by Gayle Peacock.</p>	Search A: <ul style="list-style-type: none"> - <u>Repository</u>: Anne Allaker mailbox - <u>Search Terms</u>: "Fleckney" AND "DVLA" AND "Transaction" - <u>Date Range</u>: April 2014 Search B: <ul style="list-style-type: none"> - <u>Repository</u>: Andy Winn mailbox, Rod Ismay mailbox - <u>Search Terms</u>: "Blackhall" AND "Estate" - <u>Date Range</u>: April 2014 Search C: <ul style="list-style-type: none"> - <u>Repository</u>: Gayle Peacock mailbox - <u>Search Terms</u>: "Parkstone" AND "Fujitsu" - <u>Date Range</u>: April 2014
27	16 April 2014	Davies : Audit undertaken, and mention of a report sent to SPM. Report discusses office being run in a mess, according to notes.	Search A: <ul style="list-style-type: none"> - <u>Repository</u>: Gayle Peacock mailbox - <u>Search Terms</u>: "Audit" AND "Davies" - <u>Date Range</u>: April 2014
28	30 April 2014	Post & Go : Mention of TA file being lost, but Q&A's answered questions being raised and circulated. Not clear what this relates to, or what specifically was circulated.	Search A: <ul style="list-style-type: none"> - <u>Repository</u>: Gayle Peacock mailbox - <u>Search Terms</u>: ("Post & Go" or "Post and Go") - <u>Date Range</u>: April 2014
29	7 May 2014	Money Gram fraud : Nick Beal has drafted letter to branches, letters to be	Search A: <ul style="list-style-type: none"> - <u>Repository</u>: Nick Beal mailbox

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		sent out after contract managers discuss with branches due to difficulty of conversation.	<ul style="list-style-type: none"> - <u>Search Terms</u>: "Money Gram" w/15 "Fraud" - <u>Date Range</u>: May 2014
30	14 May 2014	<p>A. Winsor Road: A response has been sent to SPM, not clear what this relates to.</p> <p>B. Esh: Response written to SPM "confirming nothing found" – not clear what this relates to.</p> <p>C. Roman Road: Reference of an email re Horizon compensation being forwarded, possibly to 'Craig'.</p>	<p>Search A:</p> <ul style="list-style-type: none"> - <u>Repository</u>: Gayle Peacock mailbox - <u>Search Terms</u>: "Winsor Road" - <u>Date Range</u>: May 2014 <p>Search B:</p> <ul style="list-style-type: none"> - <u>Repository</u>: Gayle Peacock mailbox - <u>Search Terms</u>: "Esh" - <u>Date Range</u>: May 2014 <p>Search C:</p> <ul style="list-style-type: none"> - <u>Repository</u>: Gayle Peacock mailbox - <u>Search Terms</u>: "Roman Road" AND "Compensation" AND ("Horizon" or "HNG") - <u>Date Range</u>: May 2014
31	21 May 2014	<p>A. ATM Gluing Case: Letters drafted to affected branches, being circulated to the group to determine how much information to provide.</p> <p>B. Money Gram fraud: Script produced for calls with branches, and authority given to proceed.</p> <p>C. Parkstone: Disk received from FJ, full investigation taking place.</p> <p>D. Roman Road: Gayle Peacock to send information as to investigation and compensation received by customer.</p>	<p>Search A:</p> <ul style="list-style-type: none"> - <u>Repository</u>: Gayle Peacock mailbox, Rodric Williams mailbox, Nick Beal mailbox - <u>Search Terms</u>: "ATM" w/10 "Glu*" - <u>Date Range</u>: May 2014 <p>Search B:</p> <ul style="list-style-type: none"> - <u>Repository</u>: Gayle Peacock mailbox - <u>Search Terms</u>: "Money Gram" AND "Fraud" - <u>Date Range</u>: May 2014 <p>Search C:</p> <ul style="list-style-type: none"> - <u>Repository</u>: Gayle Peacock mailbox - <u>Search Terms</u>: "Fujitsu" AND "Parkstone" - <u>Date Range</u>: May 2014 <p>Search D:</p> <ul style="list-style-type: none"> - <u>Repository</u>: Gayle Peacock mailbox

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			<ul style="list-style-type: none"> - <u>Search Terms</u>: "Roman Road" AND "Compensat" - <u>Date Range</u>: May 2014
32	11 June 2014	<p>A. Post & Go: Mention of an email from Dave Posnett to Colin Middleton, regarding final balance.</p> <p>B. Money Gram fraud: Response sent to husband of assistant, unclear which branch this relates to, but believed that assistant has been sacked.</p> <p>C. Earls Barton: Mention of an audit report following an audit on 27 May 2014. Report sent to 'Anita'.</p>	<p>Search A:</p> <ul style="list-style-type: none"> - <u>Repository</u>: Dave Posnett mailbox - <u>Search Terms</u>: ("Post & Go" or "Post and Go") AND "Middleton" - <u>Date Range</u>: June 2014 <p>Search B:</p> <ul style="list-style-type: none"> - <u>Repository</u>: Gayle Peacock mailbox - <u>Search Terms</u>: "Money Gram" AND "Fraud" - <u>Date Range</u>: June 2014 <p>Search C:</p> <ul style="list-style-type: none"> - <u>Repository</u>: Rodric Williams mailbox, Nick Beal mailbox - <u>Search Terms</u>: "Earls Barton" AND "Audit" - <u>Date Range</u>: 20 May 2014 – 4 June 2014
33	18 June 2014	<p>A. ATM Gluing Case: Reply received from Alison Bolsover re letter contents.</p> <p>B. Post & Go: Camden branch – e-mail sent to confirm shortage.</p> <p>C. Money Gram fraud: Middleton – SPM has written in, challenging the 5-year repayment plan.</p> <p>D. Money Gram fraud: Letter from MP in Westgate Hill (Shadow Minister for Information Security), Angela dealing with responding.</p>	<p>Search A:</p> <ul style="list-style-type: none"> - <u>Repository</u>: Alison Bolsover mailbox - <u>Search Terms</u>: "ATM" w/10 "Glu" - <u>Date Range</u>: June 2014 <p>Search B:</p> <ul style="list-style-type: none"> - <u>Repository</u>: Gayle Peacock mailbox - <u>Search Terms</u>: ("Post and Go" or "Post & Go") AND "Camden" AND "Short" - <u>Date Range</u>: June 2014 <p>Search C:</p> <ul style="list-style-type: none"> - <u>Repository</u>: Gayle Peacock mailbox - <u>Search Terms</u>: ("Money Gram" or "Moneygram") AND "Middleton" - <u>Date Range</u>: June 2014 <p>Search D:</p> <ul style="list-style-type: none"> - <u>Repository</u>: Gayle Peacock mailbox

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			<ul style="list-style-type: none"> - <u>Search Terms</u>: ("Money Gram" or "Moneygram") AND "Westgate Hill" - <u>Date Range</u>: June 2014
34	16 July 2014	Money Gram fraud : Further letter received from Westgate Hill MP.	Search A: <ul style="list-style-type: none"> - <u>Repository</u>: Gayle Peacock mailbox - <u>Search Terms</u>: ("Money Gram" AND "Westgate Hill" - <u>Date Range</u>: July 2014
35	30 July 2014	<p>A. Money Gram fraud: Letter received from Gordon Brown re branch, Gayle Peacock drafting response.</p> <p>B. Wembley: Anne Allaker has sent information to 'PB and SH' about something to do with a potential equipment issue. No further information provided.</p>	Search A: <ul style="list-style-type: none"> - <u>Repository</u>: Gayle Peacock mailbox - <u>Search Terms</u>: "Westgate Hill" AND "Gordon Brown" - <u>Date Range</u>: July 2014 Search B: <ul style="list-style-type: none"> - <u>Repository</u>: Shirley Hailstones mailbox - <u>Search Terms</u>: "Wembley" AND ("equipment" w/10 "fault" or "issue" or "problem" or "error") - <u>Date Range</u>: July 2014
36	13 August 2014	ATM Gluing Case : Hillingdon Heath branch – 'bespoke' letter sent to Branch relating to additional claimed discrepancy to be investigated separately.	Search A: <ul style="list-style-type: none"> - <u>Repository</u>: Gayle Peacock mailbox - <u>Search Terms</u>: ("ATM" w/10 "Glu*") AND "Hillingdon Heath" - <u>Date Range</u>: August 2014
37	24 September 2014	Transfer to ATOS : Anne Allaker has compiled a list of requirements to send to ATOS and IT supply and management team. Aim is to establish a route other than an ARQ request.	Search A: <ul style="list-style-type: none"> - <u>Repository</u>: Anne Allaker mailbox - <u>Search Terms</u>: ("List" w/10 "requirements") AND "ATOS" - <u>Date Range</u>: September 2014
38	22 October 2014	<p>A. ATM Gluing Case: Andy Winn to send a summary of matters to Anne Allaker and 'CT'.</p> <p>B. Edmonds: Dave Evans has been sent information re 'wide scale issues' by Dave Posnett.</p>	Search A: <ul style="list-style-type: none"> - <u>Repository</u>: Andy Winn mailbox - <u>Search Terms</u>: "ATM" w/10 "Glu*" - <u>Date Range</u>: October 2014 Search B: <ul style="list-style-type: none"> - <u>Repository</u>: Dave Posnett mailbox

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No.	Date of Meeting	Documents	Searches
			<ul style="list-style-type: none"> - <u>Search Terms</u>: "Edmonds" AND "Evans" - <u>Date Range</u>: October 2014
39	5 November 2014	Post and Go Berry St Edmonds : Dave Posnett to send details to Anne Allaker regarding ongoing internal problems, possibly to do with a freezing issue.	Search A: <ul style="list-style-type: none"> - <u>Repository</u>: Dave Posnett mailbox, Anne Allaker mailbox - <u>Search Terms</u>: ("Post and Go" or "Post & Go") AND "Bury St Edmunds" - <u>Date Range</u>: November 2014
40	14 January 2015	Post and Go Berry St Edmonds and City of Bath : Crown office branch reports purportedly completed in respect of both branches.	Search A: <ul style="list-style-type: none"> - <u>Repository</u>: Dave Posnett mailbox, Anne Allaker mailbox - <u>Search Terms</u>: ("Post and Go" or "Post & Go") AND ("Bury St Edmunds" or "Bath") - <u>Date Range</u>: January 2015
41	28 January 2015	Ferndale : Mention of an e-mail from Ibrahim Kilzildag to 'Kendra' as to losses, and a process document going back to 2010. This is presumably a reference to Kendra Dickinson.	Search A: <ul style="list-style-type: none"> - <u>Repository</u>: Kendra Dickinson mailbox - <u>Search Terms</u>: "Ferndale" AND "Kilzildag" - <u>Date Range</u>: January 2015
42	11 February 2015	Great Missenden : Mention of Andy Winn sending a copy of a report to Lin Norbury (contract advisor). Report relates to Horizon reports not aligning with one another.	Search A: <ul style="list-style-type: none"> - <u>Repository</u>: Andy Winn mailbox - <u>Search Terms</u>: "Great Missenden" AND "Norbury" - <u>Date Range</u>: February 2015
43	8 April 2015	<p>A. AP Mismatches: Anne Allaker has drafted an email</p> <p>B. Springfield: 'DP' has seen file submitted to 'MS' of Cartwright King, regarding son of an SPM who was making fraudulent postal orders and cashing them to clear personal debts.</p> <p>C. Accounts not clearing to 0: Anne Allaker has emailed Andy Winn about two branches raised, neither branch named.</p>	Search A: <ul style="list-style-type: none"> - <u>Repository</u>: Anne Allaker mailbox - <u>Search Terms</u>: ("AP" w/10 "mismatch*") - <u>Date Range</u>: April 2015 Search B: <ul style="list-style-type: none"> - <u>Repository</u>: Cartwright King files - <u>Search Terms</u>: "Springfield" AND ("Post*" w/5 "Order") - <u>Date Range</u>: N/A

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No.	Date of Meeting	Documents	Searches
			Search C: <ul style="list-style-type: none"> - <u>Repository</u>: Anne Allaker mailbox, Andy Winn mailbox - <u>Search Terms</u>: "Account" w/10 "clear" - <u>Date Range</u>: 1 March 2015 – 10 April 2015
44	22 April 2015	<p>A. AP mismatches: Anne Allaker has received a reply confirming that IT services had not heard from ATOS.</p> <p>B. Grimethorpe: Anne Allaker has sent information to several people to review in respect of a query relating to a gain at this branch, possibly related to a system freeze.</p> <p>C. Second sight report: Report Received, POL response sent out.</p>	Search A: <ul style="list-style-type: none"> - <u>Repository</u>: Anne Allaker mailbox - <u>Search Terms</u>: "IT" AND "ATOS" AND "match" - <u>Date Range</u>: April 2015 Search B: <ul style="list-style-type: none"> - <u>Repository</u>: Anne Allaker mailbox - <u>Search Terms</u>: "Grimethorpe" AND ("Horizon" or "HNG" or "System" w/10 "freeze" or "error" or "issue" or "bug" or "error") - <u>Date Range</u>: April 2015 Search C: Not applicable. Document previously produced to the Inquiry.
45	1 July 2015	<p>A. Moss Lane: Update email received by Anne Allaker prior to call in respect of CPS discontinuing case which Trial was listed for that Monday. POL could not provide evidence, hence CPS decision to close.</p> <p>B. Click and Collect: 'Wendy' has received communication due to go out to branches. Andy Winn to circulate copy of communication to those on the call.</p>	Search A: <ul style="list-style-type: none"> - <u>Repository</u>: Rodric Williams mailbox, Anne Allaker mailbox - <u>Search Terms</u>: "Moss Lane" AND ("CPS" or "Prosecution" or "Discontinu*") - <u>Date Range</u>: 1 June 2015 – 1 July 2015 Search B1: <ul style="list-style-type: none"> - <u>Repository</u>: Rodric Williams mailbox, Nick Beal mailbox - <u>Search Terms</u>: ("Click" w/5 "Collect") AND "Winn" - <u>Date Range</u>: 1 June 2015 – 1 July 2015 Search B2: <ul style="list-style-type: none"> - <u>Repository</u>: Andy Winn mailbox,

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No.	Date of Meeting	Documents	Searches
			<ul style="list-style-type: none"> - <u>Search Terms</u>: ("Click" w/5 "Collect") - <u>Date Range</u>: 1 June 2015 – 1 July 2015
46	26 August 2015	AP mismatches / SSKs / Disconnected sessions : Andy Winn to send Nick Beal and Anne Allaker an email re SSK not working properly.	Search A: <ul style="list-style-type: none"> - <u>Repository</u>: Andy Winn mailbox, Nick Beal mailbox - <u>Search Terms</u>: "SSK" AND ("Issue" or "Problem" or "Error" or "Bug") - <u>Date Range</u>: August 2015
47	9 September 2015	Cold Norton : Andy Winn has forwarded an e-mail to Anne Allaker. No further information provided.	Search A: <ul style="list-style-type: none"> - <u>Repository</u>: Andy Winn mailbox - <u>Search Terms</u>: "Cold Norton" - <u>Date Range</u>: September 2015
48	23 September 2015	Panorama : Detailed letter sent out addressing issues within programme. Not clear who this letter was sent to, perhaps senior editors at BBC.	Search A: <ul style="list-style-type: none"> - <u>Repository</u>: Rodric Williams mailbox - <u>Search Terms</u>: "Panorama" AND "Horizon" - <u>Date Range</u>: September 2015
49	21 October 2015	<p>A. AP mismatches / SSKs / Disconnected sessions: Anne Allaker has a 77-page document in respect of this. Information from Yeovil branch is not corroborating with a report from the security manager.</p> <p>B. Panorama: Response received to letter from makers of programme.</p>	Search A: <ul style="list-style-type: none"> - <u>Repository</u>: Anne Allaker mailbox, Andy Winn mailbox, Nick Beal mailbox - <u>Search Terms</u>: ("Mismatch*" or "SSK" or ("sessions" w/5 "connect*")) AND "Yeovil" - <u>Date Range</u>: October 2015 Search B: <ul style="list-style-type: none"> - <u>Repository</u>: Rod Williams mailbox - <u>Search Terms</u>: "Panorama" AND "Horizon" - <u>Date Range</u>: October 2015
50	4 November 2015	Panorama : Rod Williams to circulate draft of new stage complaint.	Search A: <ul style="list-style-type: none"> - <u>Repository</u>: Rodric Williams mailbox - <u>Search Terms</u>: "Panorama" AND "Complaint" - <u>Date Range</u>: November 2015

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No.	Date of Meeting	Documents	Searches
51	18 November 2015	<p>A. AP mismatches / SSKs / Disconnected sessions: Anne Allaker has received an email from Andy Wise, stating that an in-depth look into the 2 branches is needed. Branches not named.</p> <p>B. Computer Weekly / Outreach branch: Anne Allaker stating that a full report is available in respect of an investigation. Rod Williams and Nick Beal requesting a copy.</p>	<p>Search A:</p> <ul style="list-style-type: none"> - <u>Repository:</u> Anne Allaker mailbox, Andy Wise mailbox - <u>Search Terms:</u> ("Mismatch*" or "SSK" or ("session" w/5 "connect*")) AND ("branch*" w/5 "2" or "two") - <u>Date Range:</u> November 2015 <p>Search B:</p> <ul style="list-style-type: none"> - <u>Repository:</u> Nick Beal mailbox, Rodric Williams mailbox - <u>Search Terms:</u> ("Computer Weekly" or "Outreach" or "ATOS") AND "Report" - <u>Date Range:</u> November 2015
52	13 January 2016	Cold Norton: Andy Winn has produced a 1-page summary and recommendation. No further information provided.	<p>Search A:</p> <ul style="list-style-type: none"> - <u>Repository:</u> Rodric Williams mailbox, Andy Winn mailbox - <u>Search Terms:</u> "Cold Norton" - <u>Date Range:</u> 1 January 2016 – 13 January 2016
53	10 February 2016	AP mismatches / SSKs / Disconnected sessions: Anne Allaker and Andrew Wise have sent reports to Steve Blandfield. Not clear, but these appear to relate to investigations into issues and bugs.	<p>Search A:</p> <ul style="list-style-type: none"> - <u>Repository:</u> Andrew Wise mailbox, Anne Allaker mailbox - <u>Search Terms:</u> "SSK" or ("Connect*" AND "Session") - <u>Date Range:</u> 1 January 2016 – 10 February 2016
54	9 March 2016	<p>A. AP mismatches / SSKs / Disconnected sessions: Trowbridge branch – AI Engineer sent an e-mail following a site visit in which statements were misunderstood by the branch to mean that 'switches' can cause losses in the branch.</p> <p>B. Panorama: Response from BBC editorial complaints received, rejecting claim that guidelines have been breached.</p>	<p>Search A:</p> <ul style="list-style-type: none"> - <u>Repository:</u> Rodric Williams mailbox - <u>Search Terms:</u> "SSK" AND "Trowbridge" - <u>Date Range:</u> 1 February 2016 – 9 March 2016 <p>Search B:</p> <ul style="list-style-type: none"> - <u>Repository:</u> Rodric Williams mailbox, Mel Corfield mailbox - <u>Search Terms:</u> "Panorama" AND ("Editor*" w/5 "Complaint") - <u>Date Range:</u> 1 February 2016 – 9 March 2016

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No.	Date of Meeting	Documents	Searches
55	2 November 2016	Crichton Avenue: Letter received in relation to disputes, mentioning Moneygram. No further information provided.	Search A: <ul style="list-style-type: none"> - <u>Repository:</u> Rodric Williams mailbox - <u>Search Terms:</u> "Crichton Avenue" - <u>Date Range:</u> 1 October 2016 – 2 November 2016
56	16 November 2016	Crichton Avenue: Rod Williams to review an email from 'SH'.	Search A: <ul style="list-style-type: none"> - <u>Repository:</u> Rodric Williams mailbox, Shirley Hailstones mailbox - <u>Search Terms:</u> "Crichton Avenue" - <u>Date Range:</u> 1 November 2016 – 16 November 2016
57	30 November 2016	Prinetown: Statement drafted by Melanie Corfield, no further information given.	Search A: <ul style="list-style-type: none"> - <u>Repository:</u> Rod Williams mailbox - <u>Search Terms:</u> "Prinetown" - <u>Date Range:</u> 1 November 2016 – 14 December 2016
58	14 June 2017	Horizon System Issues: 'MG' has a draft version of a report. Possibly a report requested from FJ, but not immediately clear. No further information provided.	Search A: <ul style="list-style-type: none"> - <u>Repository:</u> Rodric Williams mailbox, Martin Godbold mailbox - <u>Search Terms:</u> "Barcod*" AND "Fujitsu" AND ("Horizon" or "HNG") - <u>Date Range:</u> June 2017
59	9 August 2017	A. Freeths: Group Register of Claimants B. Freeths: Defence filed – CMC 19 th October	Search A: <ul style="list-style-type: none"> - <u>Repository:</u> GLO Trial Bundles - <u>Search Terms:</u> "Group Register" w/5 "Claimant**" - <u>Date Range:</u> N/A Search B: <ul style="list-style-type: none"> - <u>Repository:</u> GLO Trial Bundles - <u>Search Terms:</u> "Defence" w/5 "Post Office Limited" - <u>Date Range:</u> N/A
60	6 September 2017	Freeths: Letter sent to Claimants highlighted for the attention of claimants working in branch.	Search A1: <ul style="list-style-type: none"> - <u>Repository:</u> Rodric Williams mailbox, GLO Trial Bundles

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No.	Date of Meeting	Documents	Searches
			<ul style="list-style-type: none"> - <u>Search Terms</u>: "Freeths" AND ("Claimant*" or "Client*" or "SPM*" or "Postmaster*" w/10 "branch") - <u>Date Range</u>: 1 July 2017 – 6 September 2017 Search A2: <ul style="list-style-type: none"> - <u>Repository</u>: Inquiry Database - <u>Search Terms</u>: "Freeths" AND ("Claimant*" or "Client*" or "SPM*" or "Postmaster*" w/10 "branch") - <u>Date Range</u>: N/A - <u>Other</u>: PDF documents only
61	5 October 2017	Branch 260246 Smethwick Installation issues: Shirley Hailstones has sent an email requesting (among other things) details of the root cause.	Search A: <ul style="list-style-type: none"> - <u>Repository</u>: Nick Beal mailbox - <u>Search Terms</u>: ("Smethwick" or "260246") AND "Instal" - <u>Date Range</u>: 1 September 2017 – 31 October 2017
62	14 December 2017	Dines Green: Consent to interview form received, Jim Coney may have sent it to Shirley Hailstones. Referenced as a 'potential trap' by POL and WBD.	Search A: <ul style="list-style-type: none"> - <u>Repository</u>: Rodric Williams mailbox, Shirley Hailstones mailbox - <u>Search Terms</u>: "Dines Green" AND "Consent to Interview" - <u>Date Range</u>: December 2017
63	9 March 2018	<p>A. Yammer: Reference to a post regarding a new tech program, with somebody writing something about "an engineer had said Post Office were not installing new kit because of new problems with it" – concerns that the wording is damning.</p> <p>B. Rem Issue Email: Email sent re Rem issue caused by amounts in suspense. Shirley Hailstones sending details to Martin Godbold</p>	Search A: <ul style="list-style-type: none"> - <u>Repository</u>: Helen Dickinson mailbox - <u>Search Terms</u>: "Yammer" AND "Post" - <u>Date Range</u>: March 2018 Search B: <ul style="list-style-type: none"> - <u>Repository</u>: Martin Godbold mailbox - <u>Search Terms</u>: ("Suspense" or "Rem*") AND ("Issue" or "Problem") - <u>Date Range</u>: March 2018
64	17 May 2018	Computer Weekly: Mention of article that discusses the system issue	Search A:

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No.	Date of Meeting	Documents	Searches
		affecting c. 2,000 branches and referencing the ongoing litigation.	<ul style="list-style-type: none"> - <u>Repository</u>: Rodric Williams mailbox, Horizon IT Mailbox - <u>Search Terms</u>: "Computer Weekly" AND "Horizon" - <u>Date Range</u>: May 2018 Search B: <ul style="list-style-type: none"> - <u>Repository</u>: CCRC Database - <u>Search Terms</u>: "Computer Weekly" AND "May 2018" - <u>Date Range</u>: N/A
65	24 January 2019	Facebook Survey : Nick Beal to send a link to this survey, survey appears to have been made by an ex SPMR and is asking for people's views on horizon.	Search A: <ul style="list-style-type: none"> - <u>Repository</u>: Rodric Williams mailbox, Nick Beal mailbox - <u>Search Terms</u>: "Survey" AND ("Horizon" or "SPM" or "Postmaster" or "Facebook") - <u>Date Range</u>: January 2019
66	7 February 2019	End user management – Smart IDs : Mention of an email just being received, discussing 26 branches being affected by some sort of issue which is being addressed by FJ through a project manager. Julie Thomas involved in some capacity.	Search A: <ul style="list-style-type: none"> - <u>Repository</u>: Rod Williams mailbox, Alison Bolsover mailbox, Martin Godbold mailbox, - <u>Search Terms</u>: ("Smart" w/5 "ID") AND ("26" w/5 "branch") - <u>Date Range</u>: February 2019
67	21 February 2019	Data cleanse : Mention of two memos which will be out on 8 March and 15 th March 2019 respectively. Information has also been recorded on dynamic.	Search A: <ul style="list-style-type: none"> - <u>Repository</u>: Martin Godbold mailbox, Shirley Hailstones mailbox - <u>Search Terms</u>: "Data" AND "Cleanse" AND ("8" or "15") - <u>Date Range</u>: March 2019
68	8 March 2019	End user management – Smart IDs : Reference to an email that morning of 8 March 2019 confirming that 31 branches were now affected.	Search A: <ul style="list-style-type: none"> - <u>Repository</u>: Rodric Williams mailbox, Alison Bolsover mailbox, Martin Godbold mailbox - <u>Search Terms</u>: "Smart" AND "ID" - <u>Date Range</u>: 1 March 2019 – 10 March 2019

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- 3.1 By its Request No. 13 dated 14 June 2022, the Inquiry requested that POL produce a number of specific documents of relevance to Phase 2 of the Inquiry's proceedings. The Inquiry requested that POL provide its response by no later than 8 July 2022.
- 3.2 In total, POL has produced **45** documents in response to Request No. 13. Relevant documents were provided to the Inquiry on 8 July 2022 and 5 August 2022. Further productions containing documents relevant to Request No. 13 and Request No. 15 were provided to the Inquiry on 29 July 2022 (14 documents) and 12 August 2022 (62 documents).
- 3.3 We set out below a summary of the searches that POL conducted in order to identify documents relevant to Request No. 13. Documents responsive to the following searches were subject to manual review, and relevant documents identified were produced to the Inquiry (subject to privilege). Please note that the below table does not set out the approach that POL adopted in relation to its response to Questions 21 and 22 of Request No. 13 (which sought information relevant to Project Emerald). This is dealt with separately at paragraph 3.9 below.

No.	Document	Search
1	Any notes or minutes of the "Stuart Team Meetings" to which reference is made in POL00028593 (your reference POL-0025075).	<p>Search A:</p> <ul style="list-style-type: none"> Repository: (i) Inquiry Database <u>and</u> (ii) GLO Database Search Terms: "Sweetman" AND "Meeting" AND ("1997" or "1998") Date range: N/A <p>Search B:</p> <ul style="list-style-type: none"> Repository: (i) Inquiry Database <u>and</u> (ii) GLO Database Search Terms: ("Stuart" or "Sweetman") AND ("Team Meeting") AND ("1997" or "1998") Date range: N/A <p>Search C:</p> <ul style="list-style-type: none"> Repository: (i) Postal Museum documents uploaded to Relativity in August 2022 Search Terms: "prayer" Date range: N/A
2	Letter of 12th December 1997 from John Bennett to Peter Crahan.	<p>Search A:</p> <ul style="list-style-type: none"> Repository: (i) Inquiry Database <u>and</u> (ii) GLO Database Search Terms: ("John" or "Bennett") AND ("Peter" or "Crahan") AND ("December" w/2 "1997") Date Range: N/A
3	Letter of 23rd December 1997	Search A:

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No.	Document	Search
	from Peter Crahan to John Bennett.	<ul style="list-style-type: none"> Repository: (i) Inquiry Database <u>and</u> (ii) GLO Database Search Terms: ("John" or "Bennett") AND ("Peter" or "Crahan") AND ("December" w/2 "1997") Date Range: N/A
4	Any notes or minutes of the Horizon Project Review Group Meeting on 20th March 1998 (to which reference is made in POL00028639 (your reference POL-0025121)).	Search A: <ul style="list-style-type: none"> Repository: (i) Inquiry Database <u>and</u> (ii) GLO Database Search Terms: "Horizon" AND "Project" AND "Review" AND ("March" w/2 "1998") Date Range: N/A
5	The Notice of Cure issued to ICL Pathway in May 1998.	Search A: <ul style="list-style-type: none"> Repository: (i) Inquiry Database <u>and</u> (ii) GLO Database Search Terms: "Notice" AND ("ICL" or "Pathway") AND ("May" w/2 "1998") Date Range: N/A
6	Letter from Paul Rich to Adrian Montague concerning the outcome of the Treasury Review (to which reference is made in POL00028650 (your reference POL-0025132)).	Search A: <ul style="list-style-type: none"> Repository: (i) Inquiry Database <u>and</u> (ii) GLO Database Search Terms: ("Paul" or "Rich") AND ("Adrian" or "Montague") AND ("1998" or "1999") AND ("Treasury" w/10 "Review") Date Range: N/A
7	Letter from Terry Austin to Dave Miller dated 10 September 1998 (to which reference is made in POL00024582 (your reference POL-0021061)).	Search A: <ul style="list-style-type: none"> Repository: (i) Inquiry Database <u>and</u> (ii) GLO Database Search Terms: ("Terry" or "Austin") AND ("Dave" or "Miller") AND ("September" w/2 "1998") Date Range: N/A
8	Letter from the Chief Secretary of the Treasury dated 23 December 1998 (to which reference is made in POL00028606 (your reference POL-0025088)).	Search A: <ul style="list-style-type: none"> Repository: (i) Inquiry Database <u>and</u> (ii) GLO Database Search Terms: "Chief Secretary" AND "Treasury" AND ("December" w/2 "1998") Date Range: N/A
9	Email from Mena Rego to David Miller dated 30 December 1998 concerning the Project Mentors report (to which reference is made in POL00038829 (your	Search A: <ul style="list-style-type: none"> Repository: (i) Inquiry Database <u>and</u> (ii) GLO Database Search Terms: ("Mena" or "Rego") AND ("David"

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No.	Document	Search
	reference POL-0027615)).	<ul style="list-style-type: none"> or "Miller") AND ("December" w/2 "1998") <u>Date Range</u>: N/A
10	ICL Pathway's further proposals concerning acceptance of the Horizon system dated 9th December 1998.	Search A: <ul style="list-style-type: none"> <u>Repository</u>: (i) Inquiry Database <u>and</u> (ii) GLO Database <u>Search Terms</u>: ("ICL" or "Pathway") AND "Horizon" AND ("December" w/2 "1998") <u>Date Range</u>: N/A
11	Letter from Fujitsu Services Limited to the Prime Minister dated 7th April 1999.	Search A: <ul style="list-style-type: none"> <u>Repository</u>: (i) Inquiry Database <u>and</u> (ii) GLO Database <u>Search Terms</u>: "Fujitsu" AND ("Prime Minister" or "Tony" or "Blair") AND ("April" w/2 "1999") <u>Date Range</u>: N/A
12	All correspondence between Stuart Sweetman and Peter Mathison in April 1999.	Search A: <ul style="list-style-type: none"> <u>Repository</u>: (i) Inquiry Database <u>and</u> (ii) GLO Database <u>Search Terms</u>: ("Stuart" or "Sweetman") AND ("Peter" or "Mathison") AND ("April" w/2 "1999") <u>Date Range</u>: N/A
13	Hamish Sandison's Advice on Live Trial sent to Dave Miller and copied to Vince Gaskell on 16 April 1999 (to which reference is made in POL00028405 (your reference POL-0024887)).	Search A: <ul style="list-style-type: none"> <u>Repository</u>: (i) Inquiry Database <u>and</u> (ii) GLO Database <u>Search Terms</u>: ("Hamish" or "Sandison" or "Bird") AND "Advice" AND ("Live" w/5 "Trial") AND ("April" w/2 "1999") <u>Date Range</u>: N/A
14	Any notes or minutes of the Counter Automation Steering Group Meeting on 13 April 1999 (to which reference is made in POL00028618 (your reference POL-0025100)).	Search A: <ul style="list-style-type: none"> <u>Repository</u>: (i) Inquiry Database <u>and</u> (ii) GLO Database <u>Search Terms</u>: "Counter Automation" AND "Steering Group" AND ("April" w/2 "1999") <u>Date Range</u>: N/A
15	Minutes of the Post Office Board Meeting on 27 April 1999 (to which reference is made in POL00028618 (your reference POL-0025100)).	Search A: <ul style="list-style-type: none"> <u>Repository</u>: (i) Inquiry Database <u>and</u> (ii) GLO Database <u>Search Terms</u>: "Post Office" AND "Board" AND ("Meeting" or "Minute") AND ("April" w/2 "1999") <u>Date Range</u>: N/A
16	Minutes of the Post Office Board	Search A:

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No.	Document	Search
	Meeting on 23 May 1999 (to which reference is made in POL00028611 (your reference POL-0025093)).	<ul style="list-style-type: none"> • <u>Repository</u>: (i) Inquiry Database <u>and</u> (ii) GLO Database • <u>Search Terms</u>: "Post Office" AND "Board" AND ("Meeting" or "Minute") AND ("May" w/2 "1999") • <u>Date Range</u>: N/A <p>Search B:</p> <ul style="list-style-type: none"> • <u>Repository</u>: HSF Database • <u>Search Terms</u>: "minutes of the meeting" or "PO99" or "POB" • <u>Date Range</u>: 23 May 1999 <p>Search C:</p> <ul style="list-style-type: none"> • <u>Repository</u>: HSF Database • <u>Search Terms</u>: "minutes of the meeting" or "PO99" or "POB" • <u>Date Range</u>: May 1999 <p>Search D:</p> <ul style="list-style-type: none"> • <u>Repository</u>: Inquiry Database • <u>Search Terms</u>: N/A • <u>Date Range</u>: May 1999 <p>Search E:</p> <ul style="list-style-type: none"> • <u>Repository</u>: GLO Database • <u>Search Terms</u>: ("minutes of the meeting" AND May 1999) or ("PO99" AND "May 1999") or ("POB" AND "May 1999") • <u>Date Range</u>: 23 May 1999
17	Memo prepared by Bob Booth concerning receipts not matching payments (to which reference is made in POL00029131 (your reference POL-0025613)).	<p>Search A:</p> <ul style="list-style-type: none"> • <u>Repository</u>: (i) Inquiry Database <u>and</u> (ii) GLO Database • <u>Search Terms</u>: ("Bob" or "Booth") AND "Receipt" AND "Payment" AND "1999" • <u>Date Range</u>: N/A
18	The full update on Horizon which was sent to Stuart Sweetman for his briefing with John Roberts on Monday 13th September 1999 (to which reference is made in POL00028462 (your reference POL-0024944)).	<p>Search A:</p> <ul style="list-style-type: none"> • <u>Repository</u>: (i) Inquiry Database <u>and</u> (ii) GLO Database • <u>Search Terms</u>: "Update" AND "Horizon" AND ("September" w/2 "1999") • <u>Date Range</u>: N/A
19	The bullet point brief prepared by Bruce McNiven for John Robert (to which reference is	<p>Search A:</p> <ul style="list-style-type: none"> • <u>Repository</u>: (i) Inquiry Database <u>and</u> (ii) GLO

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No.	Document	Search
	made in POL00028465 (your reference POL-0024947)).	Database <ul style="list-style-type: none"> • <u>Search Terms</u>: ("Bruce" or "McNiven") AND "Acceptance" AND "Horizon" AND "1999" • <u>Date Range</u>: N/A
20	Minutes of all meetings of the Counter Automation Steering Group (which have not previously been provided).	Search A: <ul style="list-style-type: none"> • <u>Repository</u>: (i) Inquiry Database <u>and</u> (ii) GLO Database • <u>Search Terms</u>: "Counter Automation" AND "Steering Group" AND ("Meeting" or "Minute") • <u>Date Range</u>: N/A

3.4 For the purpose of responding to Request No. 13 (and identifying and producing to the Inquiry documents relevant to the same), POL has made specific enquiries in relation to potentially relevant hard copy documents. In particular, POL has considered the relevance to Request No. 13 of hard copy documents held at the Oasis archives in Winchester and the Postal Museum. Further details are set out below.

3.5 Oasis

3.6 Following a review of the index of files / boxes held at the Oasis archives in Winchester, POL identified the following files / boxes which it anticipated may contain material or information of relevance to Request No. 13. POL subsequently attended the Oasis archives to review these hard copy files / boxes and, based upon that review, arranged for those files / boxes that appeared to contain potentially relevant documents to be scanned and uploaded onto Relativity. The searches set out in the above table were then conducted across these materials, and responsive documents were reviewed for relevance to the terms of Request No. 13.

No.	File Reference	Box Reference	Title
1	F00001751370	0001562866	Stuart Sweetman
2	F00001765447	0001562601	Minutes of Review Group (Range)
3	F00001756356	0001562680	Treasury Review
4	F00001749125	0001562735	Counters Automation 5
5	F00001749126	0001562735	Counters Automation 3
6	F00001749524	0001562766	Automation: BA/POCL Reports & Receipts Review – Functional Specification
7	F00001750152	0001562869	Automation 2
8	F00001751251	0001562852	Automation
9	F00001755203	0001562609	Automation BA/POCL 1997
10	F00001756266	0001562695	Automation Management
11	F00001756688	0001562730	Counter Automation Roll-Out 1990-1991 (Formerly Group 0583/1990)
12	F00001757091	0001562950	D6/1 Counter Automation (includes way ahead): AH74
13	F00001757095	0001562942	BA97: Counter Automation Steering Group

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14	F00001758271	0001562957	Automation
15	F00001758396	0001562958	Automation Committee
16	F00001759221	0001562750	Counters Automation 4
17	F00001759222	0001562750	Counters Automation 2
18	F00001759531	0001562787	Long Term Automation Strategy – Counter Automation: 1331
19	F00001763654	0001562519	Royal Mail and Automation
20	F00001765394	0001562598	Automation Transformation Programme
21	F00001765402	0001562598	Automation Process Group
22	F00001766541	0001562354	Counters Automation 1

3.7 Postal Museum

3.8 POL wrote to the Postal Museum on 16 June 2022, enquiring as to whether the Postal Museum held within its archives documents of potential relevance to Request No. 13. Files identified by the Postal Museum as potentially containing relevant documents were scanned by Millnet and uploaded onto Relativity. POL then arranged for each of the searches contained in the above table to be conducted across these materials and for responsive documents to be reviewed for relevance to this Request No 13. Relevant documents identified were produced to the Inquiry on 12 August 2022.

3.9 Approach in relation to Questions 21 and 22 (Project Emerald)

3.10 Question 21 of Request No. 23 sought an explanation in relation to a manuscript reference to "Project Emerald" included in a document that POL had previously produced to the Inquiry (**POL00028603**). Question 22 sought an explanation concerning the relevance of this Project to the Inquiry's Terms of Reference.

3.11 In order to identify documents concerning Project Emerald (and to confirm the extent to which this Project was relevant to the Inquiry's Terms of Reference), POL conducted the following targeted searches, and arranged for the manual review of all responsive documents.

No.	Repository	Search Terms
1	(i) Inquiry Database <u>and</u> (ii) GLO Database	"Project Emerald" AND ("1998" or "1999") AND "Horizon"
2	(i) Inquiry Database <u>and</u> (ii) GLO Database	"Emerald"
3	GLO Database	"Project Emerald" AND ("1998" or "1999") AND "Horizon"
4	(i) Inquiry Database <u>and</u> (ii) GLO Database	"Project Emerald"

3.12 In addition to the above searches, POL also identified the following files / boxes held at the Oasis archives in Winchester that it anticipated may contain material or information of relevance to Project Emerald. These files were reviewed, scanned and uploaded onto Relativity, and subject to a full manual review.

No.	File Reference	Box Reference	Title
1	F00001750803	0001562821	Project Emerald
2	F00001768535	0001562495	Project Emerald Development

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- 3.13 On 5 August 2022, POL arranged for its response to Questions 21 and 22 to be provided to the Inquiry. This response included a summary of POL's understanding of Project Emerald and its relevance to the Inquiry's Terms of Reference, as informed by POL's review of documents responsive to the searches set out at paragraph 3.11 above and the hard copy files referred to at paragraph 3.12 above. HSF's letter of 5 August 2022 also enclosed the complete contents of the Oasis file entitled "Project Emerald Development", in case of assistance to the Inquiry.
4. **REQUEST NO. 14**
- 4.1 By its Request No. 14 dated 15 June 2022, the Inquiry sought various documents and information relevant to Phase 4 of the Inquiry's proceedings. The Inquiry requested that POL provide its response by no later than 15 July 2022. In particular, the Inquiry sought documents/information under the following headings/themes:
- 4.1.1 Contractual Liability for Shortfalls (Questions 1 to 16);
 - 4.1.2 Civil case studies (Question 17);
 - 4.1.3 Private Prosecutions (Question 18 to 41); and
 - 4.1.4 Criminal Case Studies (Question 42).
- 4.2 The Inquiry requested POL provide responses by 15 July 2022. The Inquiry subsequently granted the following extensions:
- 4.2.1 to 29 July 2022 with respect to Question 42;¹
 - 4.2.2 to 12 August 2022 with respect to Question 17 to 41; and
 - 4.2.3 to 19 August 2022 with respect to Question 1 to 16.
- 4.3 In total, POL has produced **45,560** documents in response to Request No. 14. Relevant documents were provided to the Inquiry on 28 July 2022, 5 August 2022, 12 August 2022 and 19 August 2022.
- 4.4 **Contractual Liability for Shortfalls (Questions 1 – 16)**
- 4.5 By Questions 1 to 16 of its Request No. 14, the Inquiry requested information and documents in respect of the following areas of POL's operation:
- 4.5.1 policies and guidelines relating to the contractual liability of subpostmasters and other end users;
 - 4.5.2 audit of branch accounts;
 - 4.5.3 suspension, reinstatement or termination of subpostmasters; and
 - 4.5.4 civil enforcement actions against subpostmasters.
- 4.6 POL conducted fact finding sessions with a number of current employees who have been identified as having potentially relevant information on the operation of these areas within POL. The information gathered from these sessions were used in forming POL's response

¹ The response to Request 42 was provided to the Inquiry on 1 August 2022 due to technical difficulties experienced on 29 July 2022. Suzanne Palmer's transcripts were provided to the Inquiry on 5 August 2022.

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to Questions 1 to 16 and informed searches for potentially relevant documents. These employees and the topic of discussion with each of them are set out below:

- 4.6.1 Stephen Utting, Michael Keegan and Ian Wollon (*policies and guidelines relating to the contractual liability*);
 - 4.6.2 Simon Talbot and Paul Humber (*audit of branch accounts*);
 - 4.6.3 Nick Beal, David Southall, Esra Nadasen and Lisa Marshall (*suspension, reinstatement or termination*); and
 - 4.6.4 Michelle Stevens, Kirsty O'Connor, Jenny Smith, Jacqueline Whitham and Zoe Topham (*civil enforcement actions*).
- 4.7 In the first instance, POL conducted preliminary reviews of certain categories of documents in order to determine potentially relevant sources of information and documents. These categories of documents include:
- 4.7.1 responses to and documents disclosed in previous Calls for Evidence;
 - 4.7.2 documents disclosed in previous Rule 9 Requests;
 - 4.7.3 documents from the trial bundles in the GLO proceedings;
 - 4.7.4 witness statements filed in the GLO proceedings;
 - 4.7.5 witness statements filed in Mr M Baker & 119 Others v POL;
 - 4.7.6 various reports by Second Sight; and
 - 4.7.7 POL response to Second Sight Reports;
- 4.8 POL also conducted the following searches in order to identify documents relevant to Questions 1 – 16 of Request No. 14. Documents responsive to the searches were subject to manual review, and relevant documents identified were produced to the Inquiry (subject to privilege).

No.	Question	Search
1	Policies and guidelines (applicable in the four countries of the United Kingdom) relating to the contractual liability of subpostmasters and other end users (such as Crown office employees) for shortfalls shown by Horizon during the	Search A: <ul style="list-style-type: none"> • <u>Repository</u>: GLO Database • <u>Search Terms</u>: <ul style="list-style-type: none"> ○ Generic Document 6. Information available to POL² ○ Generic Document 8. Shortfalls ○ Generic Document 11. Investigations ○ Generic Document 12. Termination / Suspension ○ Generic Document 929. Guidance to Auditors and Investigators

² In Stage 2 Disclosure of the GLO proceedings, POL disclosed generic documents relevant to various issues. These documents can be searched by using the "Generic Document" field in the GLO Database and selecting the relevant issue.

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No.	Question	Search
	relevant period.	<p>Search B:</p> <ul style="list-style-type: none"> • <u>Repository</u>: GLO Database • <u>Search Terms</u>: <ul style="list-style-type: none"> - "Losses" AND "SPO" AND "guideline*" AND "negligence" (and Native type is like Word or Adobe or Outlook) - "Guideline*" w/10 "Responsibilit*" w/10 "Recover*" - ("Negligen*" w/10 "Carelessness" w/10 "Error*") AND "loss*" - "legal advice" AND "losses" AND "recover*" AND "guide*" AND "88" - (("Loss*" w/2 "Gain*") w/10 "policy" w/10 "Crown") AND ("2007" or "2006" or "2005" or "2004" or "2002" or "2001" or "2000" or "1999" or "1998" or "1997" or "1996") AND NOT "Final Version (Sep 2008)" AND NOT "Version 1 (Sep 2008)" (and Relativity Native Type is 'like' Adobe or Word) - "Liability for Losses Policy (for agency branches)" AND "Treatment of cash account losses at agency branches" - "Title" w/10 "Robbery Losses Within the Agency Network" - "In service debt" AND "In order for POL to be modernised and sustainable it is vital that it works" - "Postmaster Account Support" w/5 "Policy" - "Quick Guide" AND "crown" <p>Search C:</p> <ul style="list-style-type: none"> • <u>Repository</u>: GLO Database • <u>Search Terms</u>: Specific searches for the following specific documents: <ul style="list-style-type: none"> - Personnel Manual INS 3 PII - PHQ Circular 90/76 Appendix A - SPSO Discipline Paper No 1A (Jan 1984) - MDCs Guidance to District Managers 9 Aug 86) - Postal Instructions N5 A - Postal Instructions L5 Boo23 - Version 2 of Losses policy dated 2006
2	Any formal legal advice relating to the policies and guidelines described at 1. above.	<p>Search A:</p> <ul style="list-style-type: none"> • <u>Repository</u>: GLO Database • <u>Search Terms</u>: <ul style="list-style-type: none"> - Generic Document 6. Information available to POL - Generic Document 8. Shortfalls - Generic Document 11. Investigations - Generic Document 12. Termination / Suspension - Generic Document 929. Guidance to Auditors and Investigators

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No.	Question	Search
		<p>Search B:</p> <ul style="list-style-type: none"> • <u>Repository:</u> GLO Database • <u>Search Terms:</u> <ul style="list-style-type: none"> - ("Jessica" w/2 "madron") AND Unified Title is like "personal" or "guarantee" - ("Jessica" w/2 "madron") AND ("personal" w/5 "guarantee") AND "polic" - "Personal Guarantees in Company to Company Relationships" - "Personal Guarantees" AND ("Company to Company") AND "version control" AND "policy type" - "Personal Guarantees" AND "company operator" AND "version control" AND "policy type" AND "Post Office Ltd may appoint an individual or a company" <p>Search C:</p> <ul style="list-style-type: none"> • <u>Repository:</u> Jessica Madron's inbox • <u>Search Terms:</u> <ul style="list-style-type: none"> - (((("make" w/5 "good") or "discrepanc*" or ("Loss*" w/5 "incur*" or ("contractual" w/5 "responsib*" or "shortfal*" or "liabilt*" w/5 "loss*" or "responsib*" w/5 "loss*" or "establish*" w/5 "loss*" or "establish*" w/5 "gain*" or "settle*" w/5 "central*" or "manage*" w/5 "discrepanc*" or "recover*" w/5 "loss*" or "repa*" w/5 "gain*" or "repa*" w/5 "loss*" or "disput*" w/5 "discrepanc*" or "discrepanc*" w/5 "investigat*" or "financial*" w/5 "loss*")))) OR - ("polic*" AND (("postmaster*" or "subpostmaster*" or "sub-postmaster*" or "SPMR*" or "branch*") w/5 "contract*")) or (((("postmaster*" or "subpostmaster*" or "sub-postmaster*" or "SPMR*" or "branch*") w/5 "contract*") AND ("shortfall*" or "loss*")) or ("polic*" AND ("postmaster*" or "subpostmaster*" or "sub-postmaster*" or "SPMR*" or "branch*") AND "liabl*" AND ("shortfall*" or "loss*")))) AND - ("legal" or ("law" w/5 "firm") or "advice*" or "Cameron" or "mckenna" or ("bond" w/5 "pearce") or ("Bond" w/5 "Dickinson") or "Beachcroft*" or "DAC" or ("paula" w/2 "bartlett") or ("Charmian" w/2 "leatt") or ("Graeme" w/2 "Young") or ("Ros" w/2 "Ashcroft") OR - ("paul" w/2 "inwood") <p>Search D:</p> <ul style="list-style-type: none"> • <u>Repository:</u> Documents provided by WBD • <u>Search Terms:</u>

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No.	Question	Search
		<ul style="list-style-type: none"> - "Losses" w/5 "polic" - "In-Service Debt Policy" or ("In Service" w/5 "Policy") - ("Losses" w/5 "polic") AND (("Jessica" w/2 "madron") or ("paul" w/2 "inwood")) - ("In-Service Debt Policy" or ("In Service" w/5 "Policy")) AND (("Jessica" w/2 "madron") or ("paul" w/2 "inwood")) - ("make" w/5 "good") AND (("Jessica" w/2 "madron") or ("paul" w/2 "inwood")) - ("Loss" w/5 "incur") AND (("Jessica" w/2 "madron") or ("paul" w/2 "inwood")) - ("contractual" w/5 "responsib") AND (("Jessica" w/2 "madron") or ("paul" w/2 "inwood")) - "discrepanc" AND (("Jessica" w/2 "madron") or ("paul" w/2 "inwood")) - "shortfal" AND (("Jessica" w/2 "madron") or ("paul" w/2 "inwood")) - ("responsib" w/5 "loss") AND (("Jessica" w/2 "madron") or ("paul" w/2 "inwood")) - ("establish" w/5 "gain") AND (("Jessica" w/2 "madron") or ("paul" w/2 "inwood")) - ("settle" w/5 "central") AND (("Jessica" w/2 "madron") or ("paul" w/2 "inwood")) - ("recover" w/5 "loss") AND (("Jessica" w/2 "madron") or ("paul" w/2 "inwood")) - ("repa" w/5 "gain") AND (("Jessica" w/2 "madron") or ("paul" w/2 "inwood")) - ("repa" w/5 "loss") AND (("Jessica" w/2 "madron") or ("paul" w/2 "inwood")) - ("disput" w/5 "discrepanc") AND (("Jessica" w/2 "madron") or ("paul" w/2 "inwood")) - ("discrepanc" w/5 "investigat") AND (("Jessica" w/2 "madron") or ("paul" w/2 "inwood")) - ("financial" w/5 "loss") AND (("Jessica" w/2 "madron") or ("paul" w/2 "inwood")) - ("polic" AND ("postmaster" or "subpostmaster" or "sub-postmaster" or "SPMR" or "branch") AND "liabl" AND ("shortfall" or "loss")) AND (("Jessica" w/2 "madron") or ("paul" w/2 "inwood"))
3	Please confirm which department(s) held responsibility for the policies and guidelines described at 1 above. Who held responsibility for the management and oversight of that department?	Narrative response provided to the Inquiry.

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No.	Question	Search
4	Any guidance, training or instruction (applicable in the four countries of the United Kingdom) given to those responsible for conducting audits of subpostmasters' branch accounts.	Search A: <ul style="list-style-type: none"> • <u>Repository</u>: GLO database • <u>Search Terms</u>: <ul style="list-style-type: none"> - Generic Document 6. Information available to POL - Generic Document 8. Shortfalls - Generic Document 11. Investigations - Generic Document 12. Termination / Suspension - Generic Document 929. Guidance to Auditors and Investigators
5	Please provide details of the experience and qualifications of those responsible for conducting audits of subpostmasters' branch accounts.	Search A: <ul style="list-style-type: none"> • <u>Repository</u>: GLO database • <u>Search Terms</u>: <ul style="list-style-type: none"> - Generic Document 6. Information available to POL - Generic Document 8. Shortfalls - Generic Document 11. Investigations - Generic Document 12. Termination / Suspension - Generic Document 929. Guidance to Auditors and Investigators Search B: <ul style="list-style-type: none"> • <u>Repository</u>: Mailbox of Julia Marwood • <u>Search Terms</u>: <p>("job description" AND "job title") or ("JD" or "CV" or "qualification") AND ("audit*" or "field support" or "training and audit advisor" or "training & audit advisor" or "agent debt" or "debt recover*" or "regional network manager" or ("training" AND "audit manager") or "training & audit manager")</p>
6	Please confirm which department(s) held responsibility for conducting audits of subpostmasters' branch accounts during the relevant period. Who held responsibility for the oversight and management of that department?	Narrative response provided to the Inquiry.
7	Any reports, reviews, formal legal advice or investigations (produced by POL or by an external firm on POL's behalf) which address the quality of	Search A: <ul style="list-style-type: none"> • <u>Repository</u>: GLO database • <u>Search Terms</u>: <ul style="list-style-type: none"> - Generic Document 6. Information available to POL - Generic Document 8. Shortfalls

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No.	Question	Search
	the audits conducted in respect of subpostmasters' branch accounts.	<ul style="list-style-type: none"> - Generic Document 11. Investigations - Generic Document 12. Termination / Suspension - Generic Document 929. Guidance to Auditors and Investigators <p>Search B:</p> <ul style="list-style-type: none"> • <u>Repository</u>: mailboxes of Julia Marwood and Angela van den Bogerd • <u>Search Terms</u>: ("report" or "review" or "investigation" or "advice") w/5 "audit" - excluding documents that are only responsive to "audit report"
8	Any guidance, training or instruction (applicable in the four countries of the United Kingdom) given to those responsible for making determinations in relation to the suspension, reinstatement or termination of subpostmasters and any consequent appeals.	<p>Search A:</p> <ul style="list-style-type: none"> • <u>Repository</u>: GLO database • <u>Search Terms</u>: <ul style="list-style-type: none"> - Generic Document 6. Information available to POL - Generic Document 8. Shortfalls - Generic Document 11. Investigations - Generic Document 12. Termination / Suspension - Generic Document 929. Guidance to Auditors and Investigators
9	Please provide details of the experience and qualifications of those responsible for making determinations in relation to the suspension, reinstatement or termination of subpostmasters and any consequent appeals.	<p>Search A:</p> <ul style="list-style-type: none"> • <u>Repository</u>: GLO database • <u>Search Terms</u>: <ul style="list-style-type: none"> - Generic Document 6. Information available to POL - Generic Document 8. Shortfalls - Generic Document 11. Investigations - Generic Document 12. Termination / Suspension - Generic Document 929. Guidance to Auditors and Investigators <p>Search B:</p> <ul style="list-style-type: none"> • <u>Repository</u>: Mailbox of John Breeden • <u>Search Terms</u>: ("job description" AND "job title") or ("JD" or "CV" or "qualification") AND ("contract* advisor" or "contract* manager" or "contract* deployment" or "contract* management")
10	Please confirm which department(s) held responsibility for	Narrative response provided to the Inquiry.

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No.	Question	Search
	making determinations in relation to the suspension, reinstatement or termination of subpostmasters and any consequent appeals. Who held responsibility for the management and oversight of that department?	
11	Any reports, reviews, formal legal advice or investigations (produced by POL or by an external firm on POL's behalf) which address the quality of the decisions taken in relation to the suspension, reinstatement or termination of subpostmasters and any consequent appeals.	<p>Search A:</p> <ul style="list-style-type: none"> • <u>Repository</u>: GLO database • <u>Search Terms</u>: <ul style="list-style-type: none"> - Generic Document 6. Information available to POL - Generic Document 8. Shortfalls - Generic Document 11. Investigations - Generic Document 12. Termination / Suspension - Generic Document 929. Guidance to Auditors and Investigators <p>Search B:</p> <ul style="list-style-type: none"> • <u>Repository</u>: mailboxes of John Breeden and Angela Van Den Bogerd • <u>Search Terms</u>: ("report*" or "review*" or "investigation" or "advice") w/5 ("suspend*" or "suspension*" or "terminat*" or "reinstat*")
12	Any reports, briefings or formal legal advice relating to the decision to remove the contractual right of appeal from subpostmasters.	<p>Search A:</p> <ul style="list-style-type: none"> • <u>Repository</u>: GLO database • <u>Search Terms</u>: <ul style="list-style-type: none"> - Generic Document 6. Information available to POL - Generic Document 8. Shortfalls - Generic Document 11. Investigations - Generic Document 12. Termination / Suspension - Generic Document 929. Guidance to Auditors and Investigators <p>Search B:</p> <ul style="list-style-type: none"> • <u>Repository</u>: Inboxes of Jessica Madron, Rod Williams and Tracy Marshall during 2011-2012 • <u>Search Terms</u>: <ul style="list-style-type: none"> - (("postmaster*" or "subpostmaster*" or "sub-postmaster*" or "SPMR*" or "branch*") w/10 "contract*") AND "appeal*"

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No.	Question	Search
		<ul style="list-style-type: none"> - ("postmaster*" or "subpostmaster*" or "sub-postmaster*" or "SPMR*" or "branch*") AND ("shortfall*" or "loss*") AND "appeal" - "polic*" AND ("shortfall*" or "loss*") AND "appeal" <p>Search C:</p> <ul style="list-style-type: none"> • <u>Repository</u>: Jessica Madron's mailbox • <u>Search Terms</u>: <ul style="list-style-type: none"> - (((("postmaster*" or "subpostmaster*" or "sub-postmaster*" or "SPMR*" or "branch*") w/10 "contract*") AND "appeal*") - ("postmaster*" or "subpostmaster*" or "sub-postmaster*" or "SPMR*" or "branch*") AND ((("shortfall*" or "loss*") AND "appeal*")) - ("polic*" AND ("shortfall*" or "loss*") AND "appeal*") - (("make" w/5 "good") or "discrepanc*" or ("Loss*" w/5 "incur*") or ("contractual" w/5 "responsib*") or "shortfal*" or ("liabilt*" w/5 "loss*") or ("responsib*" w/5 "loss*") or ("establish*" w/5 "loss*") or ("establish*" w/5 "gain*") or ("settle*" w/5 "central*") or ("manage*" w/5 "discrepanc*") or ("recover*" w/5 "loss*") or ("repa*" w/5 "gain*") or ("repa*" w/5 "loss*") or ("disput*" w/5 "discrepanc*") or ("discrepanc*" w/5 "investigat*") or ("financial*" w/5 "loss*") AND "appeal*") - (("legal" or ("law" w/5 "firm") or "advice*" or "Cameron" or "mckenna" or ("bond" w/5 "pearce") or ("Bond" w/5 "Dickinson") or "Beachcroft*" or "DAC" or ("paula" w/2 "bartlett") or ("Charmian" w/2 "Leatt") or ("Graeme" w/2 "Young") or ("Ros" w/2 "Ashcroft")) AND "appeal*") <p>Search D:</p> <ul style="list-style-type: none"> • <u>Repository</u>: GLO database • <u>Search Terms</u>: <ul style="list-style-type: none"> (i) Wording from the contractual appeal clause which was removed <ul style="list-style-type: none"> - "appeal process review" - "contractual right of appeal" - "no right of appeal" and "new model" - "Local post office contract" and "appeal" - "Main Post Office Contract" and "appeal" - "Network Transformation Contact" - "Network Transformation Contact" and "appeal" (ii) Wording from template letters: <ul style="list-style-type: none"> - "If it is your intention to appeal, you should notify me by signing and returning to me by"; - "contractually they have 10 working days" - "You may, if you wish, appeal against this decision".

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No.	Question	Search
		<p>Search E:</p> <ul style="list-style-type: none"> • <u>Repository</u>: Documents provided by WBD • <u>Search Terms</u>: <ul style="list-style-type: none"> - "right" w/2 "appeal" - "contractual right of appeal" - ("polic*" AND ("shortfall*" or "loss*") AND "appeal*") - ("make" w/5 "good") AND "appeal*") - "discrepanc*" AND "appeal*" - (("Loss*" w/5 "incur*") AND "appeal*") - ("contractual" w/5 "responsib*") AND "appeal*") - "shortfal*" AND "appeal*" - (("liabilit*" w/5 "loss*") AND "appeal*") - ("responsib*" w/5 "loss*") AND "appeal*") - (("settle*" w/5 "central*") AND "appeal*") - ("recover*" w/5 "loss*") AND "appeal*") - ("repa*" w/5 "gain*") AND "appeal*") - ("repa*" w/5 "loss*") AND "appeal*") - ("disput*" w/5 "discrepanc*") AND "appeal*") - ("financial*" w/5 "loss*") AND "appeal*") - (("postmaster*" or "subpostmaster*" or "sub-postmaster*" or "SPMR*" or "branch*") AND ("shortfall*" or "loss*") AND "appeal*") - (((("postmaster*" or "subpostmaster*" or "sub-postmaster*" or "SPMR*" or "branch*") w/10 "contract*") AND "appeal*")
13	Any guidance, training or instruction (applicable in the four countries of the United Kingdom) given to those responsible for taking civil enforcement action to recover shortfalls shown by Horizon.	<p>Search A:</p> <ul style="list-style-type: none"> • <u>Repository</u>: GLO database • <u>Search Terms</u>: <ul style="list-style-type: none"> - Generic Document 6. Information available to POL - Generic Document 8. Shortfalls - Generic Document 11. Investigations - Generic Document 12. Termination / Suspension - Generic Document 929. Guidance to Auditors and Investigators <p>Search B:</p> <ul style="list-style-type: none"> • <u>Repository</u>: mailboxes of Alison Bolsover and Michelle Stevens • <u>Date Range</u>: January 2000 to December 2019 • <u>Search Terms</u>: <ul style="list-style-type: none"> - "train*" or "guidance" or "policy" or "procedure" or "instruction" or "workshop" or "manual" or "process" AND

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No.	Question	Search
		<p>"debt" w/10 ("court" or "solicitor" or "judgment" or "judgement" or "action" or "enforce*" or "committal" or "proceedings" or "pursue" or "claim" or "LBA" or "letter before action" or "recovery letter" or "CCJ" or "county court")</p> <ul style="list-style-type: none"> - "In Service debt Policy" AND "recover debt incurred in service" or "debt recovery" or "write off" - "legal proceedings will be issued against you" AND ("insert" or "XX") or ("standard letter I" or "standard letter J" or "standard letter K" w/10 "debt") - "Write off Policy" w/10 "debt" - ("Criteria discussed and agreed" w/10 "debt") or "Criteria used to pursue debt" - "Victoria Brooks" AND ("criteria" or "feasible" or "guidance" or "policy" or "procedure") AND ("pursue" or "debt" or "threshold" or "write off" or "LBA" or "letter before action" or "CCJ" or "bankrupt") - "Process Former Agent Debt" - "Former Agent's Debt Process Text" - "Former Subpostmaster End to End Debt Review"
14	Please provide details of the experience and qualifications of those responsible for taking civil enforcement action to recover shortfalls shown by Horizon.	<p>Search A:</p> <ul style="list-style-type: none"> • <u>Repository</u>: GLO database • <u>Search Terms</u>: <ul style="list-style-type: none"> - Generic Document 6. Information available to POL - Generic Document 8. Shortfalls - Generic Document 11. Investigations - Generic Document 12. Termination / Suspension - Generic Document 929. Guidance to Auditors and Investigators <p>Search B:</p> <ul style="list-style-type: none"> • <u>Repository</u>: Mailbox of Alison Bolsover • <u>Date Range</u>: January 2000 to December 2019 • <u>Search Terms</u>: <ul style="list-style-type: none"> - "job description" or "job title" or "JD" or "CV" AND "former agent debt" or "FAD" or "current agent debt" or "CAD" or "agent debt" or "debt recover" - "michelle" AND "stevens" AND "CV" <p>Search C:</p> <ul style="list-style-type: none"> • <u>Repository</u>: Mailbox of Michelle Stevens • <u>Date Range</u>: January 2000 to December 2019 • <u>Search Terms</u>: <ul style="list-style-type: none"> - "job description" or "job title" or "JD" or "CV" AND "former agent debt" or "FAD" or "current agent debt" or "CAD" or

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No.	Question	Search
		<p>"agent debt" or "debt recover**"</p> <ul style="list-style-type: none"> - "CV" AND "current agent debt" or "debt recovery" <p>Search D:</p> <ul style="list-style-type: none"> • <u>Repository</u>: Mailbox of Rod Ismay • <u>Date Range</u>: January 2000 to December 2019 • <u>Search Terms</u>: <ul style="list-style-type: none"> - "job description" or "job title" or "JD" or "CV" AND "former agent debt" or "FAD" or "current agent debt" or "CAD" or "agent debt" or "debt recover**" - "CV" AND "Bolsover" - "michelle" AND "stevens" AND "CV"
15	Please confirm which department(s) held responsibility for making determinations in relation to the bringing of civil enforcement action against subpostmasters to recover shortfalls shown by the Horizon. Who was responsible for the management and oversight of that department?	Narrative response provided to the Inquiry.
16	Any reports, reviews, formal legal advice or investigations (produced by POL or by an external firm on POL's behalf) which address the fairness and / or appropriateness of taking civil enforcement action against subpostmasters to recover shortfalls shown by Horizon.	<p>Search A:</p> <ul style="list-style-type: none"> • <u>Repository</u>: GLO database • <u>Search Terms</u>: <ul style="list-style-type: none"> - Generic Document 6. Information available to POL - Generic Document 8. Shortfalls - Generic Document 11. Investigations - Generic Document 12. Termination / Suspension - Generic Document 929. Guidance to Auditors and Investigators <p>Search B:</p> <ul style="list-style-type: none"> • <u>Repository</u>: mailboxes of Rod Ismay, Rodric Williams, Alison Bolsover and Michelle Stevens • <u>Date Range</u>: January 2000 to December 2019 • <u>Search Terms</u>: <p>("report" or "review" or "investigation" or "legal advice") w/10 ("debt" or "recovery" or "civil enforcement" or "enforcement action" or "civil action" or "civil recovery action" or "civil</p>

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No.	Question	Search
		proceedings" or "civil litigation" or "pursue" or "letter before action" or "LBA" or "debt recovery letter")

4.9 Civil Case Studies (Question 17)

4.10 By Question 17 of Request No. 14 the Inquiry asked for all records relating to the conduct of branch audits, civil interviews, decisions on suspension, reinstatement, termination and appeal, as well as the threat, instigation and pursuit of civil enforcement action in respect of nine individuals:

- 4.10.1 **Aslam Ramtoola**, subpostmaster between 1988 – 2000, Rochdale, England.
- 4.10.2 **Katherine McAlerney**, subpostmistress between 2000 – 2008, County Down, Northern Ireland.
- 4.10.3 **Lee Castleton**, subpostmaster between 2003 – 2004, Marine Drive, Bridlington, England.
- 4.10.4 **Susan McKnight**, subpostmistress between 2005 – 2009, Wigan, England.
- 4.10.5 **Rachel Williams**, subpostmistress 2006 – 2008, Somerset, England.
- 4.10.6 **Keith Macaldowie**, subpostmaster 2006 – 2011, Greenock, Scotland.
- 4.10.7 **Tracey Etheridge**, subpostmistress between 2008 – 2011, Gurnos Estate Post Office, Merthyr Tydfil, Wales.
- 4.10.8 **Kevin Palmer**, subpostmaster between 2007 – 2016, Essex, England.
- 4.10.9 **Frank Holt**, subpostmaster 2008 – 2017, Invernesshire, Scotland.

4.11 All nine individuals were claimants in the GLO. The Schedules of Information that were filed as part of the GLO litigation of these individuals were used as a starting point in order to determine potentially relevant information and devise appropriate search terms across various repositories. The Schedules of Information filed by each of the nine individuals have been disclosed to the Inquiry. Where applicable, evidence given in the Human Impact Hearings, including any witness statements filed in support were also reviewed for this purpose.³

4.12 Electronic client matter files held and identified as potentially relevant by WBD were collated. These consisted principally of the ICRMS or civil investigations files for each individual. No search terms were applied to these files, and these were manually reviewed, and, where relevant, produced to the Inquiry. Set out below are the names of each of the matter client files:⁴

- 4.12.1 364065.01064 - M105 - Katherine McAlerney (row 597);
- 4.12.2 364065.00960 - M001 - Lee Castleton (row 493);

³ It is noted that the majority of evidence given at the Human Impact Hearings mirror that of the Schedules of Information.

⁴ The files are named by reference to each individual's GLO claimant number.

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- 4.12.3 364065.00559 - Mrs Tracey Elizabeth Etheridge (row 380);
- 4.12.4 364065.01039 - M080 - Gareth & Tracey Etheridge (row 572);
- 4.12.5 364065.01352 - Dispute with Kevin Palmer (row 727);
- 4.12.6 364065.00992 - M033 - Rachel Anne Williams (row 525); and
- 4.12.7 348035.00134 - Mr Lee Castleton (RMG row 400).⁵
- 4.13 Napier and Sons held electronic client matter files on the case of Katherine McAlerney. These files were obtained and manually reviewed without applying any search terms, and, where relevant, produced to the Inquiry.
- 4.14 POL identified security files relating to each individual that were held by Peters & Peters. Due to the nature of these files being in relation to investigations that arose from discovery of branch audit shortfalls, all of the security files, barring Lee Castleton,⁶ were manually reviewed, and, where relevant, produced to the Inquiry.
- 4.15 Further searches were carried out using the data obtained from the Schedules of Information by applying search terms by reference to each individual and to the areas of interest cited in Question 17 of Request No. 14. In some cases, additional terms specific to the fact scenario of each individual's case (drawn from the analysis of the Schedules of information and Human Impact Witness Statements) were included as part of narrowing the number of responsive document hits. Excel documents were excluded from the searches due to the number of false positives in the results. All documents that were responsive to these searches were then manually reviewed and, where relevant, produced to the Inquiry. The production also included family documents, including those that may be non-responsive to Question 17 of Request No. 14. A summary of the searches carried out is set out below.

No.	Claimant	Search
A	Aslam Ramtoola	<p>Search A:</p> <ul style="list-style-type: none"> Repository: GLO Database Search Terms: <ul style="list-style-type: none"> ("Aslam" w/5 "Ramtoola") AND ("audit*" or "suspen*" or "terminat*" or "resign*" or "interview*" or "reinstat*" or "appeal" or "sue*" or "suing" or "pursu*" or "claim" or "court" or "recover*" or "civil" or "proceeding*" or "enforce*" or "litigat*" or "letter before action" or "LBA" or "debt recovery letter" or "settl*" or "abandon*") <p>Search B:</p> <ul style="list-style-type: none"> Repository: HSF Database Search Terms: <ul style="list-style-type: none"> ("Aslam" w/5 "Ramtoola") AND ("audit*" or "suspen*" or "terminat*" or "resign*" or "interview*" or "reinstat*" or "appeal" or "sue*" or "suing" or "pursu*" or "claim" or

⁵ Lee Castleton matter files from WBD were produced in full.

⁶ Due to the large number of documents that relate to Lee Castleton, a 25% sample of his documents from the security files were reviewed, all of which relate to POL's pursuit of civil proceedings and are relevant to Question 17 of Request No. 14. POL's decision was to disclose his files to the Inquiry in full.

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No.	Claimant	Search
		<p>"court" or "recover*" or "civil" or "proceeding*" or "enforce*" or "litigat*" or "letter before action" or "LBA" or "debt recovery letter" or "settl*" or "abandon*")</p>
B	Katherine McAlerney	<p>Search A:</p> <ul style="list-style-type: none"> • <u>Repository</u>: GLO Database • <u>Search Terms</u>: <ul style="list-style-type: none"> - ("Katherine" w/5 "McAlerney") AND ("audit*" or "suspen*" or "terminat*" or "resign*" or "interview*" or "reinstat*" or "appeal" or "sue*" or "suing" or "pursu*" or "claim" or "court" or "recover*" or "civil" or "proceeding*" or "enforce*" or "litigat*" or "letter before action" or "LBA" or "debt recovery letter" or "settl*" or "charg*" or "freedom of information" or "FOIA") <p>Search B:</p> <ul style="list-style-type: none"> • <u>Repository</u>: HSF Database • <u>Search Terms</u>: <ul style="list-style-type: none"> - ("Katherine" w/5 "McAlerney") AND ("audit*" or "suspen*" or "terminat*" or "resign*" or "interview*" or "reinstat*" or "appeal" or "sue*" or "suing" or "pursu*" or "claim" or "court" or "recover*" or "civil" or "proceeding*" or "enforce*" or "litigat*" or "letter before action" or "LBA" or "debt recovery letter" or "settl*" or "charg*" or "freedom of information" or "FOIA") AND NOT ("HQ16X0123" or "10th March 2015" or "DSAR")
C	Lee Castleton	<p>Search A:</p> <ul style="list-style-type: none"> • <u>Repository</u>: GLO Database • <u>Search Terms</u>: <ul style="list-style-type: none"> - ("Lee" w/5 "Castleton") AND ("audit*" or "suspen*" or "terminat*" or "resign*" or "interview*" or "reinstat*" or "appeal" or "sue*" or "suing" or "pursu*" or "claim" or "court" or "recover*" or "civil" or "proceeding*" or "enforce*" or "litigat*" or "letter before action" or "LBA" or "debt recovery letter" or "settl*" or "judgment" or "counter*" or "bankrupt*") <p>Search B:</p> <ul style="list-style-type: none"> • <u>Repository</u>: HSF Database • <u>Search Terms</u>: <ul style="list-style-type: none"> - ("Lee" w/5 "Castleton") AND ("audit*" or "suspen*" or "terminat*" or "resign*" or "interview*" or "reinstat*" or "appeal" or "sue*" or "suing" or "pursu*" or "claim" or "court" or "recover*" or "civil" or "proceeding*" or "enforce*" or "litigat*" or "letter before action" or "LBA" or "debt recovery letter" or "settl*" or "judgment" or "counter*" or "bankrupt*" or "Pearce") AND NOT ("DSAR")

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No.	Claimant	Search
D	Susan McKnight	<p>Search A:</p> <ul style="list-style-type: none"> • <u>Repository</u>: GLO Database • <u>Search Terms</u>: <ul style="list-style-type: none"> - ("Susan" w/5 "McKnight") AND ("audit*" or "suspen*" or "terminat*" or "resign*" or "interview*" or "reinstat*" or "appeal" or "sue*" or "suing" or "pursu*" or "claim" or "court" or "recover*" or "civil" or "proceeding*" or "enforce*" or "litigat*" or "letter before action" or "LBA" or "debt recovery letter" or "settl*" or "charg*" or "repay*" or "judgment") <p>Search B:</p> <ul style="list-style-type: none"> • <u>Repository</u>: HSF Database • <u>Search Terms</u>: <ul style="list-style-type: none"> - ("Susan" w/5 "McKnight") AND ("audit*" or "suspen*" or "terminat*" or "resign*" or "interview*" or "reinstat*" or "appeal" or "sue*" or "suing" or "pursu*" or "claim" or "court" or "recover*" or "civil" or "proceeding*" or "enforce*" or "litigat*" or "letter before action" or "LBA" or "debt recovery letter" or "settl*" or "charg*" or "repay*" or "judgment")
E	Rachel Williams	<p>Search A:</p> <ul style="list-style-type: none"> • <u>Repository</u>: GLO Database • <u>Search Terms</u>: <ul style="list-style-type: none"> - ("Rachel" w/2 "Williams") AND ("audit*" or "suspen*" or "terminat*" or "resign*" or "interview*" or "reinstat*" or "appeal" or "sue*" or "suing" or "pursu*" or "claim" or "court" or "recover*" or "civil" or "proceeding*" or "enforce*" or "litigat*" or "letter before action" or "LBA" or "debt recovery letter" or "settl*") <p>Search B:</p> <ul style="list-style-type: none"> • <u>Repository</u>: HSF Database • <u>Search Terms</u>: <ul style="list-style-type: none"> - ("Rachel" w/2 "Williams") AND ("audit*" or "suspen*" or "terminat*" or "resign*" or "interview*" or "reinstat*" or "appeal" or "sue*" or "suing" or "pursu*" or "claim" or "court" or "recover*" or "civil" or "proceeding*" or "enforce*" or "litigat*" or "letter before action" or "LBA" or "debt recovery letter" or "settl*") AND NOT ("Rachel.Kamm" or "Rachel Scott" or "DSAR" or "Rachel Harwood" or "Media Coverage")
F	Keith Macaldowie	<p>Search A:</p> <ul style="list-style-type: none"> • <u>Repository</u>: GLO Database • <u>Search Terms</u>:

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No.	Claimant	Search
		<p>- ("Keith" w/5 "Macaldowie") AND ("audit*" or "suspension*" or "termination*" or "resign*" or "interview*" or "reinstatement*" or "appeal" or "sue*" or "suing" or "pursue*" or "claim" or "court" or "recover*" or "civil" or "proceeding*" or "enforce*" or "litigate*" or "letter before action" or "LBA" or "debt recovery letter" or "settle*")</p> <p>Search B:</p> <ul style="list-style-type: none"> • <u>Repository</u>: HSF Database • <u>Search Terms</u>: <ul style="list-style-type: none"> - ("Keith" w/5 "Macaldowie") AND ("audit*" or "suspension*" or "termination*" or "resign*" or "interview*" or "reinstatement*" or "appeal" or "sue*" or "suing" or "pursue*" or "claim" or "court" or "recover*" or "civil" or "proceeding*" or "enforce*" or "litigate*" or "letter before action" or "LBA" or "debt recovery letter" or "settle*")
G	Tracey Etheridge	<p>Search A:</p> <ul style="list-style-type: none"> • <u>Repository</u>: GLO Database • <u>Search Terms</u>: <ul style="list-style-type: none"> - (("Tracey" or "Gareth") w/5 "Etheridge")) AND ("audit*" or "suspension*" or "termination*" or "resign*" or "interview*" or "reinstatement*" or "appeal" or "sue*" or "suing" or "pursue*" or "claim" or "court" or "recover*" or "civil" or "proceeding*" or "enforce*" or "litigate*" or "letter before action" or "LBA" or "debt recovery letter" or "settle*" or "charge*" or "judgment") <p>Search B:</p> <ul style="list-style-type: none"> • <u>Repository</u>: HSF Database • <u>Search Terms</u>: <ul style="list-style-type: none"> - (("Tracey" or "Gareth") w/5 "Etheridge")) AND ("audit*" or "suspension*" or "termination*" or "resign*" OR "interview*" or "reinstatement*" or "appeal" or "sue*" or "suing" or "pursue*" or "claim" or "court" or "recover*" or "civil" or "proceeding*" or "enforce*" or "litigate*" or "letter before action" or "LBA" or "debt recovery letter" or "settle*" or "charge*" or "judgment") AND NOT ("DSAR" or "Assemble Data" or "Conditions of Appointment List" or "Type 1 Thematic Issues")
H	Kevin Palmer	<p>Search A:</p> <ul style="list-style-type: none"> • <u>Repository</u>: GLO Database • <u>Search Terms</u>: <ul style="list-style-type: none"> - ("Kevin" w/5 "Palmer") AND ("audit*" or "suspension*" or "termination*" or "resign*" or "interview*" or "reinstatement*" or "appeal" or "sue*" or "suing" or "pursue*" or "claim" or "court" or "recover*" or "civil" or "proceeding*" or

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No.	Claimant	Search
		<p>"enforce*" or "litigat*" or "letter before action" or "LBA" or "debt recovery letter" or "settl*" or "release")</p> <p>Search B:</p> <ul style="list-style-type: none"> • <u>Repository</u>: HSF Database • <u>Search Terms</u>: <ul style="list-style-type: none"> - ("Kevin" w/5 "Palmer") AND ("audit*" or "suspen*" or "terminat*" or "resign*" or "interview*" or "reinstat*" or "appeal" or "sue*" or "suing" or "pursu*" or "claim" or "court" or "recover*" or "civil" or "proceeding*" or "enforce*" or "litigat*" or "letter before action" or "LBA" or "debt recovery letter" or "settl*" or "release") AND NOT ("DSAR" or "Assemble Data" or "Conditions of Appointment List" or "Brendan Palmer" or "Appraisal" or "SIP Report" or "Panther")
I	Frank Holt	<p>Search A:</p> <ul style="list-style-type: none"> • <u>Repository</u>: GLO Database • <u>Search Terms</u>: <ul style="list-style-type: none"> - ("Frank" w/5 "Holt") AND ("audit*" or "suspen*" or "terminat*" or "resign*" or "interview*" or "reinstat*" or "appeal" or "sue*" or "suing" or "pursu*" or "claim" or "court" or "recover*" or "civil" or "proceeding*" or "enforce*" or "litigat*" or "letter before action" or "LBA" or "debt recovery letter" or "settl*" or "investigation" or "Findlay" or "request* information") <p>Search B:</p> <ul style="list-style-type: none"> • <u>Repository</u>: HSF Database • <u>Search Terms</u>: <ul style="list-style-type: none"> - ("Frank" w/5 "Holt") AND ("audit*" or "suspen*" or "terminat*" or "resign*" or "interview*" or "reinstat*" or "appeal" or "sue*" or "suing" or "pursu*" or "claim" or "court" or "recover*" or "civil" or "proceeding*" or "enforce*" or "litigat*" or "letter before action" or "LBA" or "debt recovery letter" or "settl*" or "investigation" or "Findlay" or "request* information") AND NOT ("Assemble Data" or "Conditions of Appointment List")

4.16 Prosecutions (Questions 18 – 41)

- 4.17 Peters & Peters collated the information responsive to Question 18 to 41 by utilising the work undertaken in relation to the PCDE to the fullest extent possible. The PCDE covers cases where (a) the individual was convicted of a criminal offence; (b) POL (or RMG for prosecutions relating to POL that took place pre-separation) was the prosecutor; (c) the prosecution was based wholly or partly on data derived from the Horizon IT system; and (d) the prosecution was undertaken between 2000 and 2013. In the PCDE, Peters & Peters identified relevant documents by conducting a substantial search across multiple repositories. Peters & Peters approach is recorded in a Disclosure Management Document

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and Addendum that was disclosed in the course of the criminal appeal proceedings and provided to the Court of Appeal, Criminal Division. Although the PCDE (and in particular, any search terms that were applied) would not (and could not) have specifically taken into account the Requests (or the relevant Completed List of Issues), the extensive overlap between the PCDE and the Rule 9 Requests provides a sound basis for utilising the PCDE related work in this way.

- 4.18 As detailed in HSF's letter to the Inquiry dated 6 July 2022 and further to the Inquiry's email response dated 14 July 2022, POL took the following approach:
- 4.18.1 In relation to Questions 22, 23, 26, 27, 30, 31, 34, 35, 38, and 39 of the Request, POL provided information in relation to the individuals at POL that were "*responsible*" for specified areas (and not any third parties);
 - 4.18.2 POL identified which (if any) external legal advisers were instructed to provide advice and assistance in response to the Inquiry's email response to HSF dated 14 July 2022; and
 - 4.18.3 In relation to Questions 22 to 41, POL provided its responses by providing information and documents (where available) by reference to the following cases, and the individuals involved in those cases (to the extent known):
 - (A) the 23 case studies listed in Question 42; and
 - (B) the 88 case studies that were reviewed by Peters & Peters as set out in HSF's letter to the Inquiry dated 4 March 2022.
- 4.19 As explained in HSF's letter to the Inquiry dated 12 August 2022, there are certain caveats in relation to the data and information provided in response to Questions 18 to 41:
- 4.19.1 During the course of the PCDE, it became apparent to Peters & Peters that some data is no longer available or complete, apparently having been lost during the passage of time, by the application of the retention of document policy or as part of the RMG/POL separation.
 - 4.19.2 As part of the RMG/POL separation, there was a wholesale change to the email servers used. Most of the archived email data pre-dating 2012 was retained by RMG and no longer exists, including communications between Security and/or the Criminal Law Team custodians. Peters & Peters asked RMG to provide any archived email data relating to Security/Legal custodians including the back-up of the archive. Peters & Peters were informed that it had been deleted in line with RMG's data retention policies. POL conducted a search across its IT system for any archived pre-2012 email data files saved on its system (however, this was limited to data for individuals whose employment was transferred to POL in 2012). In particular, data limitations arose out of the limited availability of records (particularly in respect of lawyers from the Criminal Law team who are not employed at POL) and the passage of time that has elapsed since POL ceased private prosecutions; and
 - 4.19.3 HR files were not collected for all POL individuals responsible for, or materially involved in, the investigation and prosecutions, as part of the PCDE. Peters & Peters sought to collect HR material relating to additional Security team custodians that have since been identified. The search for HR files for a small number of individuals is ongoing. Much of the material is in hard copy and requires on-site review and collation at various sites. There is a possibility that some material, responsive to the Rule 9 Requests relating to training/qualifications, may therefore

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be identified at a later stage. Any such material will be disclosed to the Inquiry as soon as possible.

- 4.20 In addition to the material collated as part of the PCDE, Peters & Peters conducted specific searches on the 2020 version of POL's Sharepoint site (de-duplicated for the 2015 version of that repository) to identify any further relevant material. They also conducted several targeted searches, in particular in relation to Request 19.
- 4.21 Peters & Peters also conducted interviews with several Security Managers (both former and current) to better understand the nature and form of any training that they had received and the qualifications of the Security Team. Following these interviews, certain Security Managers provided Peters & Peters with materials that were referred to and discussed during the sessions.
- 4.22 Peters & Peters was also provided with any (potentially) relevant materials by HSF and POL as part of their separate Inquiry-related work. This included (but was not limited to) material relevant to Requests 18-20, 22, 26, 30, 34 and 38.
- 4.23 In response to these requests, POL has produced:
- 4.23.1 **477** documents;
- 4.23.2 written responses;
- 4.23.3 a spreadsheet that set out the available information relating to the individuals responsible for, or materially involved with, the investigations and prosecutions; and
- 4.23.4 a spreadsheet identifying the training and qualifications of the relevant teams.
- 4.24 **Criminal case studies (Question 42)**
- 4.25 As explained in HSF's letter to the Inquiry dated 6 July 2022, POL took the approach of providing the Inquiry with all materials identified as relevant for the specified individuals in Question 42 during the course of the PCDE and Peters & Peters' Inquiry-related work.
- 4.26 POL has produced a total of **25,245** documents in response to this request.

5. REQUEST NO. 15

- 5.1 By its Request No. 15 dated 1 July 2022, the Inquiry requested that POL produce a number of further specific documents of relevance to Phase 2 of the Inquiry's proceedings. The Inquiry requested that POL provide its response by no later than 22 July 2022.
- 5.2 In total, POL has produced **192** documents in response to Request No. 15. Relevant documents were provided to the Inquiry on 22 July 2022 and 15 August 2022. Further productions containing documents relevant to Request No. 13 and Request No. 15 were provided to the Inquiry on 29 July 2022 (14 documents) and 12 August 2022 (62 documents).
- 5.3 We set out below a summary of the searches that POL conducted in order to identify documents relevant to Request No. 15. Documents responsive to the following searches were subject to manual review, and relevant documents identified were produced to the Inquiry (subject to privilege).

No.	Document	Search
1	Minutes of all meetings of the Automation Steering Group	Search A:

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No.	Document	Search
		<ul style="list-style-type: none"> • <u>Repository</u>: (i) Inquiry Database <u>and</u> (ii) GLO Database • <u>Search Terms</u>: ("Steering Group" w/2 "Automation") AND ("Meeting" or "Minute") • <u>Date range</u>: N/A
2	The First, Second and Third Supplemental Agreements to the Codified Agreement	Search A: <ul style="list-style-type: none"> • <u>Repository</u>: (i) Inquiry Database <u>and</u> (ii) GLO Database • <u>Search Terms</u>: "Codified Agreement" AND "Supplement*" AND ("First" or "Second" or "Third") • <u>Date range</u>: N/A
3	Ruth Holleran's paper prepared for the Acceptance Workshop on 17th September 1999 addressing conditions for acceptance	Search A: <ul style="list-style-type: none"> • <u>Repository</u>: (i) Inquiry Database <u>and</u> (ii) GLO Database • <u>Search Terms</u>: ("Acceptance" w/5 "Workshop") AND ("September" w/2 "1999") • <u>Date range</u>: N/A Search B: <ul style="list-style-type: none"> • <u>Repository</u>: (i) Inquiry Database <u>and</u> (ii) GLO Database • <u>Search Terms</u>: "Holleran" AND "September" AND "1999" • <u>Date range</u>: N/A
4	Post Office Christmas Research Report originally circulated by email on 7 January 2000 (to which reference is made at POL00028441 (your document reference POL-0024923))	Search A: <ul style="list-style-type: none"> • <u>Repository</u>: (i) Inquiry Database <u>and</u> (ii) GLO Database • <u>Search Terms</u>: ("Christmas" AND "Research" AND ("January" w/2 "2000")) • <u>Date range</u>: N/A
5	Any reports or briefings relating to the downgrading and / or the closure of the following acceptance incidents: AI 211, AI 218, AI 376, AI 378, AI 408	Search A: <ul style="list-style-type: none"> • <u>Repository</u>: (i) Inquiry Database <u>and</u> (ii) GLO Database • <u>Search Terms</u>: ("Acceptance" w/5 "Incident" or "Report" or "Register") AND ("211" or "218" or "376" or "378" or "408") • <u>Date range</u>: N/A
6	Any reports or briefings relating to the "integrity controls" mentioned in POL00028509 (your document reference POL-0024991);	Search A: <ul style="list-style-type: none"> • <u>Repository</u>: (i) Inquiry Database <u>and</u> (ii) GLO Database

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No.	Document	Search
		<ul style="list-style-type: none"> Search Terms: "Horizon" AND ("Roll" w/2 "Out") AND ("Integrity" w/5 "Control") AND ("1999" or "2000") Date range: N/A
7	CCD entitled TPS Reconciliation and Incident Management negotiated / concluded in or around January 2000.	Search A: <ul style="list-style-type: none"> Repository: (i) Inquiry Database <u>and</u> (ii) GLO Database Search Terms: "TPS" AND ("Reconciliation w/5 "Incident Management") AND ("January" w/2 "2000") Date range: N/A

5.4 For the purpose of responding to Request No. 15 (and identifying and producing to the Inquiry documents relevant to the same), POL has made enquiries in relation to potentially relevant hard copy documents. In particular, POL has considered the relevance to Request No. 15 of hard copy documents held at the Oasis archives in Winchester and the Postal Museum. Further details are set out below.

5.5 Oasis

5.6 Following a review of the index of files / boxes held at the Oasis archives in Winchester, POL identified the following files / boxes which it anticipated may contain material or information of relevance to Request No. 15.⁷ POL subsequently attended the Oasis archives to review these hard copy files / boxes and, based upon that review, arranged for those files / boxes that appeared to contain potentially relevant documents to be scanned and uploaded onto Relativity. The searches set out in the above table were then conducted across these materials, and responsive documents were reviewed for relevance to the terms of Request No. 15.

Files

No.	File Reference	Box Reference	Description
1	F00001749125	0001562735	Counters Automation 5
2	F00001749126	0001562735	Counters Automation 3
3	F00001749524	0001562766	Automation: BA/POCL Reports & Receipts Review – Functional Specification
4	F00001750152	0001562869	Automation 2
5	F00001751251	0001562852	Automation
6	F00001755203	0001562609	Automation BA/POCL 1997
7	F00001756266	0001562695	Automation Management
8	F00001756688	0001562730	Counter Automation Roll-Out 1990-1991 (Formerly Group 0583/1990)
9	F00001757091	0001562950	D6/1 Counter Automation (includes way ahead): AH74

⁷ There is some overlap between the Oasis files that were identified as potentially containing documents relevant to Request No. 13 and Request No. 15 respectively.

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10	F00001757095	0001562942	BA97: Counter Automation Steering Group
11	F00001758271	0001562957	Automation
12	F00001758396	0001562958	Automation Committee
13	F00001759221	0001562750	Counters Automation 4
14	F00001759222	0001562750	Counters Automation 2
15	F00001759531	0001562787	Long Term Automation Strategy – Counter Automation: 1331
16	F00001763654	0001562519	Royal Mail and Automation
17	F00001765394	0001562598	Automation Transformation Programme
18	F00001765402	0001562598	Automation Process Group
19	F00001766541	0001562354	Counters Automation 1
20	F00001749874	0001562829	Change Request / Change Control Notes 326
21	F00001750871	0001562842	Change Request / Change Control Notes 221/325
22	F00001750920	0001562841	Change Control
23	F00001759205	0001562747	Change Request / Change Control Notes 71-110
24	F00001765813	0001562912	Accountancy & Reconciliation – Change Control
25	F00001768467	0001562491	Integration Change Control Manager
26	F00001750280	0001562877	CCN'S 510-530
27	F00001749066	0001562736	Acceptance Comments
28	F00001750710	0001562816	Acceptance Misc. 1
29	F00001750715	0001562816	Acceptance Misc. 2
30	F00001750913	0001562841	Acceptance
31	F00001759215	0001562750	Acceptance
32	F00001766637	0001562893	Acceptance of Operational Trial
33	F00001767288	0001562392	Acceptance Criteria - Update
34	F00001767290	0001562392	Acceptance Criteria

Boxes

No.	Item Code	SKP Number	Title
1	0001601153	472183542	Change Control Notes Supporting Correspondence and Hard Copies
2	0001611115	377518268	Horizon Contract CCNS 431-745
3	0001611090	377518269	Horizon Contract CCNS 747-972
4	0001611120	377518267	Horizon Contract CCNS 1-430

5.7 Postal Museum

5.8 POL has also written to the Postal Museum, enquiring as to whether the Postal Museum held within its archives documents of potential relevance to Request No. 15. Files identified by the Postal Museum as potentially containing relevant documents were scanned by Millnet and uploaded onto Relativity. POL then arranged for each of the searches contained in the above table to be conducted across these materials and for responsive documents to be

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reviewed for relevance to this Request No 15. Relevant documents identified were produced to the Inquiry on 12 August 2022.

6. REQUEST NO. 16

6.1 By its Request No. 16 dated 5 July 2022, the Inquiry requested that POL produce a number of organograms / structure charts in relation to POL's senior leadership team and other individuals in key posts concerning Horizon. The Inquiry requested that POL provide its response by no later than 2 August 2022.

6.2 In total, POL has produced **10** documents in response to Request No. 16. Relevant documents were provided to the Inquiry on 2 August 2022.

6.3 During the course of the Inquiry, POL has identified and collated approximately 80 organisation / structure charts and has arranged for these documents to be uploaded onto its e-Discovery platform. These structure charts were obtained from various internal POL sources. A small number of further structure charts were also identified and provided to POL by Womble Bond Dickinson. In order to ensure (insofar as possible) the comprehensiveness of the organisation / structure charts obtained to date, POL arranged for the manual review of all documents located on the Inquiry Database that Relativity assessed as having a similarity ranking of +90% to the structure charts / organograms provided to date. In addition, POL ran the following keyword searches across the indices of the GLO Trial Bundles:

- 6.3.1 "organogram"
- 6.3.2 "organisational chart"
- 6.3.3 "organisation chart"
- 6.3.4 "org chart"
- 6.3.5 "org_chart"
- 6.3.6 "org charts"
- 6.3.7 "org_charts"
- 6.3.8 "network structure"
- 6.3.9 "network_structure"
- 6.3.10 "team profiles"
- 6.3.11 "team_profiles"
- 6.3.12 "structure"
- 6.3.13 "structure chart"
- 6.3.14 "structure_chart"
- 6.3.15 "profiles"
- 6.3.16 "structure chart and profiles"

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6.4 POL arranged for a full manual review of all of the organisation / structure charts identified for relevance to Request No. 16. All documents that were identified as relevant were produced to the Inquiry on 2 August 2022, together with copies of further documents which, whilst not strictly responsive to Request No. 16, POL anticipated would nonetheless be of interest and assistance to the Inquiry. In addition to these materials, POL also arranged for the following documents to be prepared and provided to the Inquiry:

6.4.1 **List of POL Board members:** This document contained the names and dates of service of all POL Board members, as ascertained from Companies House.

6.4.2 **List of meeting attendees:** This document set out a full list of attendees of the following committees / working groups: (i) the Project Sparrow Sub-Committee, (ii) the GLO / Postmaster Litigation Sub-Committee, (iii) the Mediation Scheme Working Group and (iv) the Horizon Issues Working Group. Updated versions of this list were subsequently provided to the Inquiry on 12 August 2022 and 26 August 2022, including certain additional attendees of the Horizon Issues Working Group.

7. REQUEST NO. 17

7.1 By its Request No. 17 dated 17 August 2022, the Inquiry sought various documents and information relevant to the overturned conviction of Mr Grant Allen by 26 August 2022.

7.2 As explained in HSF's letter to the Inquiry dated 26 August 2022, POL took a similar approach in relation to Request No. 17 as it did for the criminal case studies requested as part of Request 42 of Rule 9 Request No. 14 (see further at Section 4 above).

7.3 POL has produced a total of **673** documents in response to this request.

8. REQUEST NO. 18

8.1 By its Request No. 18 dated 23 August 2022, the Inquiry requested that POL produce a series of further board documents. The Inquiry requested that POL provide its response by no later than 7 September 2022.

8.2 In total, POL has produced **62** documents in response to Request No. 18. Relevant documents were provided to the Inquiry on 7 September 2022.

8.3 We set out below a summary of the searches that POL conducted in order to identify documents relevant to Request No. 18. Documents responsive to the following searches were subject to manual review, and relevant documents identified were produced to the Inquiry (subject to privilege).

No.	Document	Search
1	If written, a letter from the Chief Executive to the Post Office's Minister, Ian McCartney, highlighting the Post Office's concerns about Horizon as referenced at p.11 of 16 of the Board Minutes of 20 July 1999, document POL00000352.	Search A: <ul style="list-style-type: none"> <u>Repository:</u> (i) Inquiry Database <u>and</u> (ii) GLO Database <u>Search terms:</u> ("McCartney") AND "Horizon" AND ("1999" w/10 "May" or "June" or "July") <u>Date range:</u> N/A
2	If carried out and recorded in a document, a review of the	Search A:

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No.	Document	Search
	decision to continue with the limited rollout of Horizon to 900 pilot offices as referenced as an action point in p.4 of 17 of Board Minutes made on 14 September 1999, document POL00000353.	<ul style="list-style-type: none"> • <u>Repository</u>: (i) Inquiry Database <u>and</u> (ii) GLO Database • <u>Search terms</u>: ("Sweetman") AND "Horizon" AND ("Roll*" <u>w/2</u> "Out") or "Pilot") AND ("1999" or "2000") • <u>Date range</u>: N/A
3	Any documents presented to the board detailing issues with rollout with Project Horizon.	<p>Search A:</p> <ul style="list-style-type: none"> • <u>Repository</u>: (i) Inquiry Database, (ii) GLO Database <u>and</u> (iii) HSF Database • <u>Search</u>: "Board" AND "Minute" AND "Meeting" AND "Attend*" AND ("1998" or "1999" or "2000" or "2001") • <u>Date range</u>: To the extent responsive documents had metadata, all documents that were dated after 2002 were excluded from this search. <p>Search B:</p> <ul style="list-style-type: none"> • <u>Repository</u>: All Board minutes currently held on Relativity (including any additional Board minutes identified following Search A above) • <u>Search</u>: "Horizon" • <u>Date range</u>: To the extent responsive documents had metadata, all documents that were dated after 2002 were excluded from this search. <p>Search C:</p> <ul style="list-style-type: none"> • <u>Repository</u>: (i) Inquiry Database <u>and</u> (ii) GLO Database • <u>Search</u>: "Board" AND "Meeting" AND ("Paper*" or "Report*" or "Brief*") AND "Horizon" AND ("1998" or "1999" or "2000" or "2001") • <u>Date range</u>: To the extent responsive documents have metadata, please exclude all documents that are dated after 2002.
4	Business Board Minutes between January 2000 and June 2001.	<p>Search A:</p> <ul style="list-style-type: none"> • <u>Repository</u>: (i) Inquiry Database, (ii) GLO Database <u>and</u> (iii) HSF Database • <u>Search</u>: "Board" AND "Minute" AND "Meeting" AND "Attend*" AND ("1998" or "1999" or "2000" or "2001") • <u>Date range</u>: To the extent responsive documents had metadata, all documents that were dated after 2002 were excluded from this search. <p>Search B:</p> <ul style="list-style-type: none"> • <u>Repository</u>: (i) Inquiry Database <u>and</u> (ii) GLO Database

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No.	Document	Search
		<ul style="list-style-type: none"> • <u>Search</u>: "Business Board" AND "Minute*" AND ("2000" or "2001") • <u>Date range</u>: N/A
5	The White Paper referenced at p.2 of 16 of the Board Minutes made on 20 July 1999, document POL00000352.	<p>Search A:</p> <ul style="list-style-type: none"> • <u>Repository</u>: (i) Inquiry Database <u>and</u> (ii) GLO Database • <u>Search terms</u>: "White Paper" AND "1999" • <u>Date range</u>: To the extent responsive documents have metadata, please exclude all documents that are dated after 2002.
6	Report and presentation made by Duncan Hine as referenced at p.9 in the Board Minutes made on 14 September 1999, document POL00000353.	<p>Search A:</p> <ul style="list-style-type: none"> • <u>Repository</u>: (i) Inquiry Database <u>and</u> (ii) GLO Database • <u>Search terms</u>: ("Duncan" w/5 "Hine") AND "Horizon" AND ("1999" w/10 "August" or "September" or "October") • <u>Date range</u>: To the extent responsive documents have metadata, please exclude all documents that are dated after 2002. <p>Search B: ⁸</p> <ul style="list-style-type: none"> • <u>Repository</u>: Inquiry Database • <u>Search terms</u>: <ul style="list-style-type: none"> ○ "PO/007" ○ "POB(00)4" ○ "Duncan Hine" AND "Report" ○ "Duncan Hine" AND "Presentation" ○ "Hine" AND ("Report" or "Presentation") AND "11 January 2000" ○ "Hine" AND ("Report" or "Presentation") AND "January 2000" ○ "Technology" AND "Information System*" AND "Duncan Hine" • <u>Date range</u>: N/A
7	Chief Executive's Report CB(01)19 as reference in p.3 of 9 of the Board Minutes dated 12 June 2001, document POL00021476.	<p>Search A:</p> <ul style="list-style-type: none"> • <u>Repository</u>: (i) Inquiry Database <u>and</u> (ii) GLO Database • <u>Search terms</u>: ("John" w/5 "Roberts") AND "Report" AND "2001"

⁸ There is no reference to the Duncan Hine presentation or report in the 14 September 1999 minutes. Duncan Hine was not in attendance at that meeting. There is, however, a reference to the report and presentation of Duncan Hine in the minutes of the meeting held on 11 January 2000 (POL00000001).

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No.	Document	Search
		<ul style="list-style-type: none"> <u>Date range</u>: To the extent responsive documents have metadata, please exclude all documents that are dated after 2002. <p>Search B:</p> <ul style="list-style-type: none"> <u>Repository</u>: HSF Database <u>Search terms</u>: <ul style="list-style-type: none"> "CB(01)19" "CB01/31" ("Chief Executive*" AND "Report" AND "June 2001") <u>Date range</u>: N/A
8	All Audit Committee minutes from 1998 to 2001 (inclusive) and any substantive papers produced for the purpose of the Audit Committee insofar as they are relevant to the development, acceptance, roll out and subsequent monitoring of the Horizon IT system.	<p>Search A:</p> <ul style="list-style-type: none"> <u>Repository</u>: (i) Inquiry Database <u>and</u> (ii) GLO Database <u>Search</u>: ("Audit" w/2 "Committee") AND "Minute*" AND "Horizon" AND ("1998" or "1999" or "2000" or "2001") <u>Date range</u>: N/A <p>Search B:</p> <ul style="list-style-type: none"> <u>Repository</u>: (i) Inquiry Database <u>and</u> (ii) GLO Database <u>Search</u>: ("Audit" w/2 "Committee") AND ("Paper*" or "Report*" or "Brief*" or "Document*") AND "Horizon" AND ("1998" or "1999" or "2000" or "2001") <u>Date range</u>: N/A
9	Any documents that were produced for the purpose of the Post Office / Consignia Board from 1998 to 2001 (inclusive) insofar as they are relevant to the development, acceptance, roll out and subsequent monitoring of the Horizon IT system.	<p>Search A:</p> <ul style="list-style-type: none"> <u>Repository</u>: (i) Inquiry Database, (ii) GLO Database <u>and</u> (iii) HSF Database <u>Search</u>: "Board" AND "Minute" AND "Meeting" AND "Attend*" AND ("1998" or "1999" or "2000" or "2001") <u>Date range</u>: To the extent responsive documents had metadata, all documents that were dated after 2002 were excluded from this search. <p>Search B:</p> <ul style="list-style-type: none"> <u>Repository</u>: All Board minutes currently held on Relativity (including any additional Board minutes identified following Search A above) <u>Search</u>: "Horizon" <u>Date range</u>: To the extent responsive documents had metadata, all documents that were dated after 2002 were excluded from this search.

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No.	Document	Search
		Search C: <ul style="list-style-type: none"> • <u>Repository</u>: (i) Inquiry Database <u>and</u> (ii) GLO Database • <u>Search</u>: "Board" AND "Meeting" AND ("Paper*" or "Report*" or "Brief*") AND "Horizon" AND ("1998" or "1999" or "2000" or "2001") • <u>Date range</u>: To the extent responsive documents have metadata, please exclude all documents that are dated after 2002.

8.4 For the purpose of responding to Request No. 18 (and identifying and producing to the Inquiry documents relevant to the same), POL has made enquiries in relation to potentially relevant hard copy documents. In particular, POL has considered the relevance to Request No. 15 of hard copy documents held at the Postal Museum.

8.5 POL wrote to the Postal Museum on 30 August 2022, enquiring as to whether the Postal Museum held within its archives documents of potential relevance to Request No. 18 (and, in particular, documents relevant to the Inquiry's Questions 3, 4, 8 and 9). The Postal Museum archivists identified a total of eight (8) files of potential relevance to these matters, five (5) of which had previously been requested, scanned and uploaded onto Relativity. The additional three (3) files identified by the Postal Museum as potentially containing relevant documents were scanned by Millnet and uploaded onto Relativity. POL then arranged for each of the searches contained in the above table to be conducted across these materials and for responsive documents to be reviewed for relevance to this Request No 18. Relevant documents identified were produced to the Inquiry on 16 September 2022.

9. **REQUEST NO. 19**

9.1 By its Request No. 19 dated 26 August 2022, the Inquiry requested that POL produce a series of further documents relevant to Phases 2 and 3 of the Inquiry's proceedings. The Inquiry requested that POL provide its response by no later than 5 September 2022.

9.2 In total, POL has produced 7 documents in response to Request No. 19. Relevant documents were provided to the Inquiry on 5 September 2022.

9.3 We set out below a summary of the searches that POL conducted in order to identify documents relevant to Request No. 19. Documents responsive to the following searches were subject to manual review, and relevant documents identified were produced to the Inquiry (subject to privilege).

No.	Document	Search
1	Document POL00028323 includes at page 21 the minutes of the Automation Transformation Steering Group Meeting of the 18 August 1998. Under item 3 it refers to a presentation given by Stephen Woolley, and states that slides are attached to the minutes. Please provide copies of these	Search A: <ul style="list-style-type: none"> • <u>Repository</u>: (i) Inquiry Database <u>and</u> (ii) GLO Database • <u>Search Terms</u>: "Woolley" AND "EPOSS" AND "1998" • <u>Date range</u>: N/A

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No.	Document	Search
	slides.	
2	Document POL00043668 (POL-0040171) refers at Action No. 4 (page 7) to a paper being prepared by Ruth Holleran and Darren Bosco relating to urgent issues such as testing and EPOSS. Please provide this / these paper(s).	Search A: <ul style="list-style-type: none"> • <u>Repository:</u> (i) Inquiry Database <u>and</u> (ii) GLO Database • <u>Search Terms:</u> "EPOSS" AND ("Holleran" or "Bosco") AND "1998" • <u>Date range:</u> N/A
3	Any other written reports or slideshows prepared by Darren Bosco relating to the EPOSS application.	Search A: <ul style="list-style-type: none"> • <u>Repository:</u> (i) Inquiry Database <u>and</u> (ii) GLO Database • <u>Search Terms:</u> "EPOSS" AND ("Bosco") AND ("1998" or "1999") • <u>Date range:</u> N/A
4	Documents referred to in bullet points in document POL00039783, consisting of the following:	
4A	Horizon database key information (from John Meagher)	Search A: <ul style="list-style-type: none"> • <u>Repository:</u> (i) Inquiry Database <u>and</u> (ii) GLO Database • <u>Search Terms:</u> "Meagher" AND ("Horizon" w/5 "database") AND ("1998" or "1999") • <u>Date Range:</u> N/A
4B	Regular reports on potential risks which a training solution could avert, from: (i) Horizon service reports, (ii) BA/Pathway/PoCL joint meetings, (iii) Before and After procedures group	Search A: <ul style="list-style-type: none"> • <u>Repository:</u> (i) Inquiry Database <u>and</u> (ii) GLO Database • <u>Search Terms:</u> <ul style="list-style-type: none"> ○ ("Horizon" w/5 "Service") AND "Report" AND "training solution" AND ("1998" or "1999") ○ (("BA" or "Benefits Agency") AND ("Pathway" or "ICL") AND ("PoCL" or "Post Office")) AND ("Joint" w/5 "Meeting") AND ("1998" or "1999") • <u>Date range:</u> N/A Search B: <ul style="list-style-type: none"> • <u>Repository:</u> Inquiry Database • <u>Search Terms:</u> "Horizon Service Report" • <u>Date Range:</u> N/A Search C:

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No.	Document	Search
		<ul style="list-style-type: none"> • <u>Repository</u>: (i) Inquiry Database <u>and</u> (ii) GLO Database • <u>Search Terms</u>: "Horizon Service Report" • <u>Date Range</u>: To the extent responsive documents had metadata, all documents that were dated after 2000 were excluded from this search.
4C	Progress reports on roll-out (e.g. number of people being trained) Dara Forde to supply	<p>Search A:</p> <ul style="list-style-type: none"> • <u>Repository</u>: (i) Inquiry Database <u>and</u> (ii) GLO Database • <u>Search Terms</u>: "Forde" AND "progress" AND "roll-out" AND ("1998" or "1999") • <u>Date range</u>: To the extent responsive documents had metadata, all documents that were dated after 2000 were excluded from this search.
4D	Clare's conformance report and CEC paper	<p>Search A:</p> <ul style="list-style-type: none"> • <u>Repository</u>: (i) Inquiry Database <u>and</u> (ii) GLO Database • <u>Search Terms</u>: "Dryhurst" AND ("conformance" or "CEC") AND ("1998" or "1999") • <u>Date range</u>: N/A
4E	Research services reports: assessment of product association for counter clerks, Horizon	<p>Search A:</p> <ul style="list-style-type: none"> • <u>Repository</u>: (i) Inquiry Database <u>and</u> (ii) GLO Database • <u>Search Terms</u>: ("research services") AND ("1998" or "1999") • <u>Date range</u>: N/A
4F	Right First Time report (HEB)	<p>Search A:</p> <ul style="list-style-type: none"> • <u>Repository</u>: (i) Inquiry Database <u>and</u> (ii) GLO Database • <u>Search Terms</u>: ("right first time") AND ("1998" or "1999") • <u>Date range</u>: N/A
4G	Ann Green's report on Ic offices	<p>Search A:</p> <ul style="list-style-type: none"> • <u>Repository</u>: (i) Inquiry Database <u>and</u> (ii) GLO Database • <u>Search Terms</u>: "Green" AND ("Ic" w/5 "office") AND ("1998" or "1999") • <u>Date range</u>: N/A

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No.	Document	Search
4H	Kate Doyle to provide report on what we've learned from regional helplines and systemline that could help us identify common problems	Search A: <ul style="list-style-type: none"> <u>Repository:</u> (i) Inquiry Database <u>and</u> (ii) GLO Database <u>Search Terms:</u> "Doyle" AND ("helpline*" or "systemline*") AND "1999" <u>Date range:</u> To the extent responsive documents had metadata, all documents that were dated after 2000 were excluded from this search.
4I	Trevor Rollason's report to Bruce McNiven	Search A: <ul style="list-style-type: none"> <u>Repository:</u> (i) Inquiry Database <u>and</u> (ii) GLO Database <u>Search Terms:</u> "Rollason" AND "McNiven" AND "Report" AND ("1998" or "1999") <u>Date range:</u> N/A
4J	Report on ECCO and manual offices, from Sue Smith	Search A: <ul style="list-style-type: none"> <u>Repository:</u> (i) Inquiry Database <u>and</u> (ii) GLO Database <u>Search Terms:</u> "Smith" AND "ECCO" AND ("manual" w/5 "office*") AND ("1998" or "1999") <u>Date range:</u> N/A
4K	Kevin Lenihan's early report on risk to transaction processing	Search A: <ul style="list-style-type: none"> <u>Repository:</u> (i) Inquiry Database <u>and</u> (ii) GLO Database <u>Search Terms:</u> "Lenihan" AND ("risk" w/10 "transaction") AND ("1998" or "1999") <u>Date range:</u> N/A

9.4 For the purpose of responding to Request No. 19 (and identifying and producing to the Inquiry documents relevant to the same), POL has made enquiries in relation to potentially relevant hard copy documents. In particular, POL has considered the relevance to Request No. 19 of hard copy documents held at the Postal Museum.

9.5 POL wrote to the Postal Museum on 30 August 2022, enquiring as to whether the Postal Museum held within its archives documents of potential relevance to Request No. 19. The Postal Museum archivists confirmed that they do not hold any files or boxes that they consider may contain documents of relevance to Request No. 19, beyond the files / boxes that had previously been scanned and uploaded to Relativity.

10. REQUEST NO. 20

10.1 By its Request No. 20 dated 26 August 2022, the Inquiry requested that POL produce a picture, diagram or print-out of what data / information sub-postmasters could typically see on the Horizon terminal at the point of balancing their accounts. The Inquiry made clear that

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this was a request in relation to Legacy Horizon, and that documents produced in response to the same should include any major changes in the period from 2000 to 2010. The Inquiry requested that POL provide its response to Request No. 20 by no later than 2 September 2022.

- 10.2 In total, POL has produced **12** documents in response to Request No. 20. Relevant documents were provided to the Inquiry on 2 September 2022.
- 10.3 We set out below a summary of the searches that POL conducted in order to identify documents relevant to Request No. 20. Documents responsive to the following searches were subject to manual review, and relevant documents identified were produced to the Inquiry (subject to privilege).

No.	Repository	Search Terms
1	GLO Trial Bundles	"balanc*"
2	HSF Database	"horizon system user guide" AND "balancing" AND "2000"
3	HSF Database	"weekly balance period rollover"
4	HSF Database	"Horizon printout" AND "balancing"
5	HSF Database	"Horizon printout" AND "mediation"
6	HSF Database	"mediation" AND "balancing" AND "screenshot"
7	HSF Database	"Branch Trading: balancing booklet"
8	HSF Database	"operations manual" AND "balancing" AND "1999 or 2000"
9	HSF Database	"Monthly Trading Period Rollover" AND "balance"
10	HSF Database	"Branch Trading Statement" AND "balance"

- 10.4 In addition to the above targeted searches, POL also conducted the following reviews for documents relevant to Request No. 20:
- 10.4.1 a full review of the materials held on the "POL Training Library Archive" SharePoint site;
- 10.4.2 a full review of all operations manuals in use as at February 2009 (as provided to HSF by Mark Horne of POL);
- 10.4.3 a review of two hard copy operations manuals identified from the pool of hard copy documents collated from the Leeds archives; and
- 10.4.4 a full review of all of the hard copy documents that had been identified, scanned and uploaded to Relativity following the site visit to the Chesterfield archives on 3 August 2022.

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- 11.1 By its Request No. 21 dated 12 September 2022, the Inquiry requested that POL produce a number of further documents relevant to Phase 2 of the Inquiry's proceedings. The Inquiry requested that POL provide its response to Request No. 21 by no later than 26 September 2022.
- 11.2 In total, POL has produced **51** documents in response to Request No. 21. Relevant documents were provided to the Inquiry on 26 September 2022, 30 September 2022 and 14 October 2022.
- 11.3 We set out below a summary of the searches that POL conducted in order to identify documents relevant to Request No. 21. Documents responsive to the following searches were subject to manual review, and relevant documents identified were produced to the Inquiry (subject to privilege).

No.	Document	Search
1	Any risk registers produced by POCL in relation to Horizon in the period 1998 – 2001	Search A: <ul style="list-style-type: none"> <u>Repository:</u> (i) Inquiry Database, (ii) GLO Database and (iii) HSF Database <u>Search Terms:</u> <ul style="list-style-type: none"> "risk register" AND ("1998" or "1999" or "2000" or "2001") AND ("POCL" or "Post Office Counters Limited") AND "Horizon" "The rating of the risks" "RISKS TO BE REPORTED TO" AND "Register" ("Service provider risk register" or "programme risk register") AND ("1998" or "1999" or "2000" or "2001") <u>Date Range:</u> N/A
2	Any reports produced by POCL Business Service Management relating to the performance of Horizon in the period 1999 – 2001	Search A: <ul style="list-style-type: none"> <u>Repository:</u> Inquiry Database <u>Search Terms:</u> <ul style="list-style-type: none"> ("Business Service" or "Service Management") AND "Horizon" AND "performance" "BSM" AND "Acceptance Incident" AND ("1999" or "2000" or "2001") <u>Date Range:</u> 1 January 1999 – 31 December 2001 Search B: <ul style="list-style-type: none"> <u>Repository:</u> Inquiry Database <u>Search Terms:</u>

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No.	Document	Search
		<ul style="list-style-type: none"> ○ ("Business Service" or "Service Management") AND "Horizon" AND ("1999" or "2000" or "2001") ○ "Radka" AND "Horizon" AND ("1999" or "2000" or "2001") ○ "BSM" AND "Horizon" AND ("1999" or "2000" or "2001") <ul style="list-style-type: none"> • <u>Date range</u>: N/A <p>Search C:</p> <ul style="list-style-type: none"> • <u>Repository</u>: HSF Database • <u>Search Terms</u>: <ul style="list-style-type: none"> ○ ("Business Service" or "Service Management") AND "Horizon" AND "performance" AND ("1999" or "2000" or "2001") ○ ("Business Service" or "Service Management") AND "Horizon" AND ("1999" or "2000" or "2001") ○ ("Radka" or "Dave Miller" or "Dave McLaughlin") AND "Horizon" AND ("1999" or "2000" or "2001") ○ "BSM" AND "Horizon" AND ("1999" or "2000" or "2001") ○ "BSM" AND "Acceptance Incident" AND ("1999" or "2000" or "2001") • <u>Date Range</u>: N/A
3	A complete copy of the Business Service Management Report produced on 29 January 1999 (POL-0036334)	Not applicable. Relevant document identified manually from Oasis documents scanned and uploaded to Relativity in April 2022.
4	The "short update" authored by Professor Andrew Davies of Project Mentors Ltd to which reference is made in the Memo dated 8th December 1998 at page 3 of POL00038829 (Control Number: POL-0027615)	<p>Search A:</p> <ul style="list-style-type: none"> • <u>Repository</u>: Inquiry Database • <u>Search Terms</u>: "Andrew Davies" AND "1998" AND "update" • <u>Date Range</u>: N/A
5	Any documents (including "problem statements", "proposed solutions" or "assessment" documents) that were prepared in response to and/or following on from paragraph 4 of David Millers letter to Stuart Sweetman, dated 16 November 1998 (Paragraph 4 of POL00028421 (Control Number: POL-0024903)	<p>Search A:</p> <ul style="list-style-type: none"> • <u>Repository</u>: Inquiry Database • <u>Search Terms</u>: <ul style="list-style-type: none"> ○ "problem statements" ○ "proposed solutions" ○ "assessment" " ○ "Sweetman"

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No.	Document	Search
		<ul style="list-style-type: none"> <u>Date range</u>: 16 November 1998 to 31 December 1999 <p>Search B:</p> <ul style="list-style-type: none"> <u>Repository</u>: Inquiry Database <u>Search Terms</u>: <ul style="list-style-type: none"> "98" AND ("testing" or "milestone*") AND "Horizon release management" "98" AND ("testing" or "milestone*") AND "Horizon release management" <u>Date range</u>: Where metadata was available, all documents dated after 31 December 1999 were excluded. <p>Search C:</p> <ul style="list-style-type: none"> <u>Repository</u>: Inquiry Database <u>Search Terms</u>: <ul style="list-style-type: none"> ("problem statement*" or "proposed solution*" or "assessment*") AND ("Sweetman" or "Millers") AND ("1998" or "1999") "problem statements" or "proposed solutions" or "assessment" AND "Sweetman" AND "1998" <u>Date range</u>: N/A
6	A copy of Vince Gaskell's letter dated 07 April 1999, as referred to in the first paragraph of Dave Millers letter dated 08 April 1999 (POL00028406 – Control Number: POL-0024888);	<p>Search A:</p> <ul style="list-style-type: none"> <u>Repository</u>: (i) Inquiry Database, (ii) GLO Database and (iii) HSF Database <u>Search Terms</u>: <ul style="list-style-type: none"> "gaskell" AND "April 1999" "Dave Miller" AND "Vince Gaskell" ("vinc*" or "gask*") AND ("dave" or "miller") AND "Apr*" AND "1999" ("vinc*" or "gask*") AND ("dave" or "miller") AND ("7" w/3 ("April" or "99")) ("vinc*" or "gask*") AND "Benton" AND "April" <u>Date Range</u>: N/A
7	A copy of document POL00028590 (Control Number: POL-0025080), including page 26. The copy of this document previously disclosed to the Inquiry by the Post Office only contained 25 of 26 pages;	<p>Search A:</p> <ul style="list-style-type: none"> <u>Repository</u>: Inquiry Database <u>Search Terms</u>: "This report is produced by the POCL Service Management team and provides a high level" <u>Date Range</u>: N/A

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No.	Document	Search
8	A copy of the letter from Dave Miller to George McCorkell referenced at paragraph 3 of document POL00028657 (Control Number: POL-0025139) in which it was suggested that there should be constraints on the advice sought from the Programme Lawyer;	Search A: <ul style="list-style-type: none"> • <u>Repository</u>: Inquiry Database • <u>Search Terms</u>: "Dave Miller" AND "McCorkell" AND "Programme Lawyer's advice" • <u>Date Range</u>: N/A
9	A copy of the Memorandum dated 09 February 1999, as referred to in paragraph 1 of document POL00031109 (Control Number: POL-0027593);	Search A: <ul style="list-style-type: none"> • <u>Repository</u>: (i) Inquiry Database, (ii) GLO Database and (iii) HSF Database • <u>Search Terms</u>: <ul style="list-style-type: none"> ○ "1999" AND "Memorandum" AND "dave miller" AND "Kelsey" ○ "1999" AND "dave miller" AND "Kelsey" ○ "What are the Target Dates?" • <u>Date Range</u>: N/A
10	A copy of the contract assurance report ("PWKP4-40") referred to in paragraph 1.12 (page 2) of document POL00028152 (Control Number: POL-0024634);	Search A: <ul style="list-style-type: none"> • <u>Repository</u>: Inquiry Database • <u>Search Terms</u>: "PWKP4-40" • <u>Date Range</u>: N/A
11	A copy of the value factor report ("PWKP4-41") referred to in paragraph 1.12 (page 2) of document POL00028152 (Control Number: POL-0024634)	Search A: <ul style="list-style-type: none"> • <u>Repository</u>: Inquiry Database • <u>Search Terms</u>: "PWKP4-41" • <u>Date Range</u>: N/A
12	A copy of the Formal Response to Review of Horizon Performance and Problem Managing Report issued February 2000, and any other documentation dealing with how the issues raised in report were addressed.	Search A: <ul style="list-style-type: none"> • <u>Repository</u>: Inquiry Database • <u>Search Terms</u>: "Horizon Performance" AND "Report" AND "2000" AND "review" • <u>Date Range</u>: N/A

11.4 For the purpose of responding to Request No. 21 (and identifying and producing to the Inquiry documents relevant to the same), POL has made enquiries in relation to potentially relevant hard copy documents. In particular, POL has considered the relevance to Request No. 21 of hard copy documents held at the Oasis archives in Winchester and the Postal Museum. Further details are set out below.

11.5 Oasis

11.6 Following a review of the index of files / boxes held at the Oasis archives in Winchester, POL identified the following files / boxes which it anticipated may contain material or information

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of relevance to Request No. 21 (and, in particular, to Questions 1 and 2). On 20 September 2022, POL arranged for these files / boxes to be scanned in their entirety and uploaded onto Relativity. The searches set out in the above table were then conducted across these materials, and responsive documents were reviewed for relevance to the terms of Request No. 21.

Files

No.	File Reference	Box Reference	Description
1	F00001750706	0001562816	DSS Reporting & Online Service
2	F00001750962	0001562840	ICL: Implementation Supplier Reporting Requirements
3	F00001755450	0001562628	Certificate of Internal Controls
4	F00001755912	0001562649	Horizon: Security
5	F00001755913	0001562649	Horizon: Service Report
6	F00001759495	0001562789	Horizon Reports and Receipt
7	F00001759501	0001562789	Migration of Post Offices to Horizon post National Rollout
8	F00001766813	0001562373	BA / POCL Consultancy – Pathway 1993
9	F00001769478	0001562887	Horizon: Service Reports
10	F00001755343	0001562641	Counters Reports 97/98
11	F00001765370	0001562597	CAPS 27: CAPS Programme Volumetrics Report
12	F00001769059	0001562525	CAPS 14: Technical Implementation
13	F00001769061	0001562525	CAPS IT 11: PAS Exceptions
14	F00001769063	0001562525	CAPS IT 11: Personal Issue of PUN's
15	F00001755886	0001562653	Risk Management
16	F00001755890	0001562653	Counters Risk Management Committee (CRMC)
17	F00001766820	0001562373	ICL Pathway – Fraud Risk Management
18	F00001769479	0001562887	Horizon: Fraud Risk Management – General Correspondence
19	F00001755328	0001562627	Business Unit Performance Review (BUPR)
20	F00001758304	0001562963	Horizon: Performance & Service Levels
21	F00001755888	0001562653	Service Management
22	F00001768546	0001562498	Horizon Commercial: Workload Brief

Boxes

No.	File Barcode	File Number	Description
1	F00001750706	0001562816	DSS Reporting & Online Service
2	F00001750962	0001562840	ICL: Implementation Supplier Reporting Requirements
3	F00001755450	0001562628	Certificate of Internal Controls
4	F00001755912	0001562649	Horizon: Security
5	F00001755913	0001562649	Horizon: Service Report
6	F00001759495	0001562789	Horizon Reports and Receipt
7	F00001759501	0001562789	Migration of Post Offices to Horizon post National Rollout

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8	F00001766813	0001562373	BA / POCL Consultancy – Pathway 1993
9	F00001769478	0001562887	Horizon: Service Reports
10	F00001755343	0001562641	Counters Reports 97/98
11	F00001765370	0001562597	CAPS 27: CAPS Programme Volumetrics Report
12	F00001769059	0001562525	CAPS 14: Technical Implementation

11.7 Postal Museum

11.8 POL wrote to the Postal Museum on 14 September 2022, enquiring as to whether the Postal Museum held within its archives documents of potential relevance to Request No. 21. The Postal Museum archivists confirmed that they do not hold any files or boxes that they consider may contain documents of relevance to Request No. 21, beyond the files / boxes that had previously been scanned and uploaded to Relativity.

11.9 The Inquiry's letter of 10 October 2022

11.10 By its letter of 10 October 2022, the Inquiry sought certain clarifications in relation to POL's response to Request No. 21. The Inquiry also requested that POL produce a copy of one further document: a copy of Vince Gaskell's letter dated 26 March 1999, as referred to in the first paragraph of Dave Miller's letter dated 01 April 1999 (POL00028407 – Control Number: POL-0024889). The Inquiry requested that POL provide its response by no later than 14 October 2022.

11.11 POL provided its response to the Inquiry's letter of 10 October 2022 on 14 October 2022.

11.11.1 The Inquiry requested that POL confirm that its searches for "[a]ny reports produced by POCL Business Service Management relating to the performance of Horizon in the period 1999 – 2001" included all 'CONGO' reports for the period 1999 – 2001. HSF's letter of 14 October 2022 confirmed that, in searching for documents relevant to Question 2 of Request No. 21, specific searches had not been carried out for the purpose of identifying 'CONGO' reports. HSF explained that POL had accordingly conducted further searches and enclosed with its letter of 14 October 2022 copies of relevant documents identified. For reference, the further searches conducted by POL are set out below.

(A) Repository: (i) Inquiry Database, (ii) GLO Database and (iii) HSF Database

(B) Search Terms: "Congo" **AND** "Report" **AND** ("1999" or "2000" or "2001")

(C) Date Range: N/A

11.11.2 HSF's letter of 14 October 2022 explained that POL had conducted further searches for the Vince Gaskell's letter dated 26 March 1999 and enclosed the document that POL considered to be responsive to this request. For reference, the searches conducted to identify this document are set out below:

(A) Repository: Inquiry Database

(B) Search Terms:

(1) "Vince Gaskell" **AND** "26 March 1999"

Second Interim Disclosure Statement**18 October 2022**(2) "26" **AND** "March" **AND** "1999"(C) Date Range: N/A**12. REQUEST NO. 22**

12.1 By its Request No. 22 dated 15 September 2022, the Inquiry sought various documents and information relevant to the overturned conviction of Ms Alison Lorraine Hall by 29 September 2022.

12.2 Pursuant to Request No. 6, POL had previously disclosed certain documents related to Ms Hall's prosecution on 3 December 2021. Request No. 22 sought any further documents concerning Ms Hall's prosecution.

12.3 As explained in HSF's letter to the Inquiry dated 29 September 2022, POL took a similar approach in relation to Request No. 22 as it did for the criminal case studies requested as part of Request 42 of Rule 9 Request No. 14 and Request No. 17 (see further at Section 4 and 7 above). POL excluded the documents that had previously been disclosed under Request No. 6 from this production.

12.4 POL has produced a total of **537** documents in response to this request.

13. REQUEST NO. 23

13.1 By its Request No. 23 dated 4 October 2022, the Inquiry requested that POL produce a number of further board minutes and schedules. The Inquiry requested that POL provide its response to Request No. 23 by no later than 7 October 2022.

13.2 We set out below a summary of the searches that POL conducted in order to identify documents relevant to Request No. 23. Documents responsive to the following searches were subject to manual review, and relevant documents identified were produced to the Inquiry (subject to privilege).

No.	Document	Search
1	The Minutes of the Acceptance Board which recommended acceptance of the Core Systems Release in late September 1999;	Search A: <ul style="list-style-type: none"> <u>Repository</u>: (i) Inquiry Database, (ii) GLO Database and (iii) HSF Database <u>Search Terms</u>: <ul style="list-style-type: none"> ("Acceptance" w/3 "Board") AND "minute*" AND (("Sep*" w/3 ("99" or "1999")) or "9/99" or "9/1999") <u>Date Range</u>: N/A
2	The Minutes of the Release Authorisation Board which authorised the acceptance of the Core Systems Release in late September 1999.	Search A: <ul style="list-style-type: none"> <u>Repository</u>: (i) Inquiry Database, (ii) GLO Database and (iii) HSF Database <u>Search Terms</u>: <ul style="list-style-type: none"> ("Release" w/3 "Authorisation" w/3 "Board") AND "minute*" AND (("Sep*" w/3 ("99" or "1999")) or "9/99" or "9/1999")

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No.	Document	Search
		<ul style="list-style-type: none"> <u>Date Range: N/A</u>
3	A complete copy of Schedule A07 to the Authorities Agreement dated 24 May 1996. POL00028163 (your reference POL-0024645) contains only 5 of 6 pages – page 6 of 6 appears to be missing.	Not applicable. The discrepancy on the page numbering is as a result of the way the Relativity software displays the original native document in the Relativity native viewer.

13.3 For the purpose of responding to Request No. 23 (and identifying and producing to the Inquiry documents relevant to the same), POL has made enquiries in relation to potentially relevant hard copy documents. In particular, POL has considered the relevance to Request No. 23 of hard copy documents held at the Oasis archives in Winchester and the Postal Museum. Further details are set out below.

13.4 Oasis

13.5 Following a review of the index of files / boxes held at the Oasis archives in Winchester, POL identified the following files / boxes which it anticipated may contain material or information of relevance to Request No. 23 (and, in particular, to Questions 1 and 2). On 7 October 2022, Oasis confirmed that each of these files had previously been scanned and uploaded to Relativity save for the file entitled "RAB Matrix". POL subsequently arranged for the full contents of this file to be scanned, uploaded to Relativity and reviewed for relevance to Request No. 23. HSF's letter of 12 October 2022 confirmed that this review had completed and that no further documents of relevance to Request No. 23 had been identified.

No.	ID	Barcode	Description
1	F00001765683	0001562544	Minutes of Project Team Meetings
2	F00001755134	BUK_F6181	Pathway – Release 1c Authorisation Vol 1 & 2
3	F00001767327	BUK_F6181	Pathway – Release 2 Authorisations
4	F00001767327	BUK_F6181	Pathway – Release 2 Authorisations
5	F00001751063	BUK_F6181	Release Authorisation
6	F00001755134	BUK_F6181	Pathway – Release 1c Authorisation Vol 1 & 2
7	F00001767327	BUK_F6181	Pathway – Release 2 Authorisations
8	F00001750708	BUK_F6181	RAB Matrix

13.6 Postal Museum

13.7 POL wrote to the Postal Museum on 4 October 2022, enquiring as to whether the Postal Museum held within its archives documents of potential relevance to Request No. 23. The Postal Museum archivists confirmed that they do not hold any files or boxes that they consider may contain documents of relevance to Request No. 23, beyond the files / boxes that had previously been scanned and uploaded to Relativity.

14. SUPPLEMENTAL PRODUCTIONS

14.1 Since the date of the First Interim Disclosure Statement, POL has also produced further tranches of documents in response to certain of the Rule 9 Requests addressed in that

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statement. Further details in respect of these supplemental productions, and the steps that POL took to identify these documents, are set out below.

14.2 Request No. 4

- 14.2.1 By its Request No. 4 dated 3 November 2021 and 26 November 2021, the Inquiry requested that POL produce copies of all board (and sub-committee) minutes since 2000 which relate to the Horizon IT System.
- 14.2.2 HSF's letter of 16 September 2022 explained that, during the course of conducting searches for documents relevant to Request No. 18, POL had identified a small number of pre-2000 board minutes which discussed Horizon-related issues. Further to the Inquiry's letter of 22 September 2022, POL arranged for copies of these pre-2000 board minutes to be produced to the Inquiry on 27 September 2022.
- 14.2.3 By its letter dated 14 October 2022, the Inquiry requested that POL confirm whether it holds any Post Office Counters Limited ("**POCL**") board minutes in the period from 1 January 1996 to 31 December 2001. In response to this request, POL conducted the following searches and arranged for the manual review of responsive documents for relevance:

Search A

- (A) Repository: HSF Database
- (B) Search Terms:
- (1) "Post Office Counters" **AND** "Minute" **AND** "Meeting"
 - (2) "Post Office Counters" **w/6** "Minutes of a meeting"
- (C) Date Range: N/A

Search B

- (A) Repository: Inquiry Database
- (B) Search Terms:
- (1) "Post Office Counters" **AND** "Minute" **AND** "Meeting"⁹
 - (2) "Post Office Counters" **w/6** "Minutes of a meeting"
 - (3) ("Post Office Counters" **w/10** "Minute") **AND** "Meeting"
 - (4) "Post Office Counters" **AND** "Minutes of the meeting"
- (C) Date Range: N/A

Search C

- (A) Repository: GLO Database
- (B) Search Terms:

⁹ Sort Date: Value not set or prior to 1 January 2002.

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- (1) "Post Office Counters" **w/10** "Minutes of the meeting"
- (2) "Post Office Counters" **AND** "Minutes of the meeting"
- (3) "Post Office Counters" **AND** "Minute" **AND** "Meeting"¹⁰

(C) Date Range: N/A

14.2.4 HSF's letter of 17 October 2022 confirmed that POL had identified one minute of the POCL board in the period requested by the Inquiry and enclosed a copy of the same. HSF's 17 October 2022 letter also recorded that POL had made enquiries with the Postal Museum in respect of this request and that the Postal Museum had confirmed that it did not hold any relevant documents.

14.3 Request No. 5

14.3.1 By its Request No. 5 dated 26 November 2021, the Inquiry requested that POL produce copies of various legally privileged materials, including copies of formal written external legal advice concerning the Group Litigation and Second Sight.

14.3.2 HSF's letter of 5 April 2022 noted the following:

- (A) in relation to Question 5 of the Request No. 5 (Second Sight), POL proposed to carry out a further targeted review of email correspondence between Mr Rodric Williams (of POL) and WBD.¹¹
- (B) in relation to Question 6 of Request No. 5 (Group Litigation), there was a technical issue with respect to the date range searches that were applied to documents provided by Womble Bond Dickinson ("**WBD**") which meant additional keyword responsive documents would need to be reviewed.

14.3.3 HSF's letter of 30 May 2022 explained that each of the reviews described at paragraph 14.3.2 above had completed and enclosed documents identified as relevant to Request No. 5. That letter also explained that certain documents subject to Without Prejudice privilege had been withheld from this production pending the provision of consent from Freeths (the law firm that represented the Claimants in the Group Litigation). These documents were subsequently produced to the Inquiry on 20 June 2022.

14.4 Request No. 10

14.4.1 By its Request No. 10 dated 18 February 2022, the Inquiry requested that POL produce various documents of relevance to Phases 2 and 3 of the Inquiry's proceedings, including (at Question 27) *"any reports, records or investigations which address the extent of permissions or privileged access rights granted to Fujitsu personnel"*.

14.4.2 HSF's letter of 15 August 2022 explained that POL was in the course of arranging for all hard copy documents that had been collected from various hard copy archives to be reviewed for responsiveness to any of the Rule 9 Requests and that it anticipated shortly being in a position to produce the first tranche of relevant

¹⁰ Document Type: Word or PDF.

¹¹ 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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documents identified. HSF's letter of 15 August 2022 also recorded that, in conducting this hard copy review, POL had identified an internal POL email chain that was responsive to Question 27 of Request No. 10 and that POL proposed to conduct further searches over the mailboxes of the individuals involved in this email chain and would produce any relevant documents identified to the Inquiry as soon as possible.

- 14.4.3 The supplemental searches that POL conducted are set out below – all documents responsive to these searches were reviewed in full for relevance to Question 27 of Request No. 5. In total, POL identified a further 78 documents which it arranged to be produced to the Inquiry on 29 September 2022.

Search A:

- (A) Repositories: Rod Ismay mailbox, John Breeden mailbox, Angela van den Bogerd mailbox
- (B) Search Terms: (("Remote" or "Privilege*") w/2 "Access") **AND** "Fujitsu"
- (C) Date Range: N/A

Search B:

- (A) Repositories: Mailbox data harvested in respect of Mike Granville and Lynn Hobbs in the Group Litigation
- (B) Search Terms: (("Remote" or "Privilege*") w/2 "Access") **AND** "Fujitsu"
- (C) Date Range: N/A

14.5 Request No. 11

- 14.5.1 By its Request No. 11 dated 28 February 2022, the Inquiry requested that POL produce copies of various documents that had been referred to in Board and Sub-Committee minutes that POL had previously produced to the Inquiry (in response to Request No. 4).

CCRC Documents

- 14.5.2 HSF's letter of 14 April 2022 explained that POL had become aware that a substantial volume of documents stored on the CCRC Database had been uploaded onto Relativity without any extracted text, with the result that these documents would not have been captured by any of the targeted searches that had been conducted for the purpose of responding to Request No. 11. That letter also explained that POL had resolved this issue and, having repeated its Request No. 11 searches, had identified a further tranche of relevant documents. These documents were produced to the Inquiry on 14 April 2022.
- 14.5.3 HSF's letter of 30 May 2022 explained that, on 13 May 2022, POL discovered that approximately 2,000 documents responsive to one of the Request No. 11 searches¹² had been omitted due to a technical error. HSF's letter of 30 May 2022 explained that these documents had been manually reviewed for responsiveness

¹² ("Investigat*" or "Prosecut*") w/10 ("Policy")

Second Interim Disclosure Statement

18 October 2022

to Request No. 11 (in particular, to Questions 15 and 46A) and enclosed copies of further relevant documents identified.

Whistleblowing Policy

- 14.5.4 HSF's letter of 6 September 2022 explained that POL had previously produced (on 31 March 2022) various versions of the Whistleblowing Policy in response to Request No. 11 (and, in particular, Question 48), including the version in force at the time (Version 6.1). HSF's letter of 6 September 2022 also explained that POL had since approved a new version of the Whistleblowing Policy (Version 7) and enclosed a copy of the same.