

*Third Interim Disclosure Statement
30 November 2022*

THE POST OFFICE HORIZON IT INQUIRY

Third Interim Disclosure Statement on behalf of Post Office Limited

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

A. INTRODUCTION

2. I have made the following interim disclosure statements to the Inquiry on behalf of POL:
 - (A) The statement produced to the Inquiry on 27 May 2022 ("First Interim Disclosure Statement"); and
 - (B) The statement produced to the Inquiry on 18 October 2022 ("Second Interim Disclosure Statement").
3. I have prepared this third interim disclosure statement in response to the request made by the Inquiry at paragraph 2 of its letter dated 10 November 2022 (the "Third Interim Disclosure Statement" and "10 November Letter", respectively). This Third Interim Disclosure Statement addresses the questions listed at (a) to (i) of the Inquiry's 10 November Letter (the "Inquiry's Questions"). In order to respond to the Inquiry's Questions, I have set out in this statement details of hard copy document reviews and productions in various sections. Therefore, I have set out in section C a summary of this position, before I then address the Inquiry's Questions. In summary, the Inquiry's Questions concern:

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- (A) Indexing issues;
- (B) POL's consideration of wider hard copy repositories;
- (C) POL's document retention policy;
- (D) POL's reliance on hard copy communications between 1995 – 2000 and reliance on electronic communications post 2000;
- (E) Work product by Peters & Peters Solicitors LLP ("Peters & Peters") and Womble Bond Dickinson;
- (F) Outstanding hard copy document reviews;
- (G) Documents identified at Chesterfield;
- (H) The eight additional files referred to in HSF's letter of 4 November 2022; and
- (I) Documents initially reviewed against the Inquiry's Terms of Reference.

4. I have addressed Inquiry's Questions (a) to (e) in consequential order at sections D to H of this statement. I then go on to address the Inquiry's Question (h) at section I of this statement, before turning to the Inquiry's Questions (g) and then (f) and (i) of the 10 November Letter at sections J, K and L of this statement, respectively.

5. In HSF's letter to the Inquiry dated 11 November 2022, HSF informed the Inquiry that POL had identified additional hard copy materials at POL's Swansea and Midway House, Birmingham ("Birmingham Midway") sites that it considered may include documents that could be relevant to the Inquiry's Terms of Reference. As foreshadowed in that letter, this statement also addresses those matters at section J, including POL's proposed approach to the review of documents from those sites

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that may be relevant to the Inquiry's Terms of Reference. This section also refers to documents recently found at an Oasis site in Belfast ("Belfast Oasis").

6. Following receipt of the Inquiry's letter dated 28 November 2022, I have set out at section M POL's response to the Inquiry's question set out at paragraph 5(a) of the letter. The question set out in paragraph 5(b) concerning the data on two CDS is dealt with in the table at 80 and I understand that POL intends to write further to the Inquiry on this point.
7. I have also set out at section N of this statement details of a further assurance process that POL will undertake in relation to its potential hard copy repositories.
8. I am an appropriate person to make this Third Interim Disclosure Statement, particularly in the light of the facts that (a) I made the First and Second Interim Disclosure Statements and (b) as explained therein, following the board's appointment of HSF as POL's solicitors, I am ultimately responsible for instructing HSF in respect of POL's response to each of the requests made to POL by the Inquiry under Rule 9 of the Inquiry Rules 2006 ("Rule 9 Requests"), based on the instructions that I and POL's in-house lawyers, under the supervision of POL's Inquiry Director, receive from our colleagues in the business and ultimately the POL Inquiry executive steering committee and board.
9. In this statement I refer to:
 - (A) Steps and/or decisions taken by POL in connection with the Rule 9 Requests, including with the assistance of HSF (and POL's other legal representatives). POL's communications with HSF (and other legal representatives) were and remain by their nature privileged. For the avoidance of doubt, any reference to discussions should

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not be taken as a waiver of that privilege, whether expressly or impliedly; and

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

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

B. DEFINED TERMS

11. In this statement, I have adopted the defined terms used in the First and Second Interim Disclosure Statements. Where I have used additional acronyms and defined terms, I have set out a definition of each, as I have introduced them. However, for convenience, I also set out the meanings of these acronyms and definitions below:

10 November Letter	the Inquiry's letter dated 10 November 2022.
Belfast Oasis	POL's Oasis site in Belfast.
Birmingham Midway	POL site at Midway House, Birmingham
Completed List of Issues	See paragraph 30 below.

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HMC	Historical Matters Committee.
Inquiry's Questions	the questions listed at (a) to (i) of the Inquiry's 10 November Letter.
PCDE	Post Conviction Disclosure Exercise.
Peters & Peters	Peters & Peters Solicitors LLP.
Postal Museum's Appraisal List	A list of documents from the Post Museum which had been created as part of the Postal Museum's appraisal process.
Rule 9 Requests	Requests made to POL by the Inquiry under Rule 9 of the Inquiry Rules 2006.
Third Interim Disclosure Statement	third interim disclosure statement in response to the request made by the Inquiry at paragraph 2 of its letter dated 10 November 2022.

C. SUMMARY OF REVIEWS AND PRODUCTION

12. In this statement I set out a table (at paragraph 80) that summarises the hard copy reviews that are on-going and/or where documentation is anticipated to be produced to the Inquiry shortly. In broad terms only (and for the purpose of assisting the Inquiry in navigating the detailed content of this statement), I have set out in this section of the statement a further high-level summary of the position.
13. As an overarching point, I hope that it is evident from the below that a significant amount of work has been undertaken in relation to review of hard copy documents and the outstanding tasks are limited in nature. I understand that, save for the Fujitsu

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reports recently identified on 2 CDs (which may be of relevance to phase 3, and in relation to which I understand a letter is to be sent to the Inquiry today updating it on the position) and notwithstanding the point I make below in paragraph 15, the majority of the limited documentation that is in the process of being reviewed or in some cases, prepared for production, does not relate to phase 2 of the Inquiry.

14. In this respect I note that (as explained in more detail in this statement), POL anticipates making two productions of documents to the Inquiry that will cover material from four reviews, by Friday 2 December 2022. These productions, in approximate terms only, concern four documents relating to phase 2 of the Inquiry, 27 documents relating to phase 3 of the Inquiry and 519 documents relating to phase 4 of the Inquiry.

On-going reviews

15. As the Inquiry will no doubt appreciate, and as explained in more detail in paragraph 110 below, it is not possible to definitively attribute documents which are in the process of being reviewed to specific stages of the Inquiry.
16. However, in order to assist the Inquiry, I note in general and approximate terms only, that the material requested to date from the on-going review of the indices arising from the Unindexed Items Project (approximately 38 items – i.e. boxes and files) has appeared, from initial reviews, to relate to phases 3 and 4 of the Inquiry. Similarly, in respect of the Omnidox review, the items produced to date have been produced on the basis they are responsive to Rule 9 Requests relating to phases 3 and 4 of the Inquiry. As noted below, the final production of the documents subject to this review will be made by no later than 9 December 2022.
17. I note that there are approximately 77 boxes and 10 mail sacks that have been identified at either Chesterfield, Birmingham Midway or Belfast Oasis as requiring

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review and/or which are in the process of being sent to Winchester to be indexed. It is, at present, not currently anticipated that the documents from Chesterfield (approximately 45 boxes) will be relevant to the Inquiry (though HSF will review indices setting out the contents of these boxes to ascertain if they may contain relevant documentation). Whilst POL is carrying out a sampling review of electronic materials found at Chesterfield, it is not clear at present whether any of those would be relevant to Rule 9 Requests and a significant amount of the electronic material has already been determined not to be responsive. POL will progress these reviews and produce any relevant information to the Inquiry.

18. I note further that there are approximately five lengthy documents (which have originated from Swansea and which do not form part of the anticipated production this week) that are currently in the process of being reviewed. These do not, at present, appear to relate to any Rule 9 Requests.
19. Similarly, whilst there are also 78 files that were recently provided to HSF by RMG and indicated to relate to 'Horizon' which will be reviewed, it is not clear at present whether the documents within the files are relevant to Rule 9 Requests received to date.
20. Further, and for completeness, the summary table at paragraph 80, summarises a review that is underway in respect of documents that were only brought to POL's attention yesterday (29 November 2022). POL will take steps to review this documentation as appropriate and, where relevant, documentation will be produced to the Inquiry.

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D. INDEXING ISSUES

Question No. 2(a) of Inquiry's 10 November Letter

Why did POL not alert the Inquiry to the full extent of the indexing issues at Oasis in the First Interim Disclosure Statement? See the First Interim Disclosure Statement, [31].

21. On 13 May 2022, the Inquiry requested that POL produce, by 27 May 2022, the First Interim Disclosure Statement in relation to all of its disclosure to the Inquiry up until that date. The Inquiry requested that the First Interim Disclosure Statement be made in accordance with paragraph 18 of the Inquiry's Protocol on the Disclosure of Documents, which read:

"18. The Inquiry may request a signed disclosure statement if it deems the same to be necessary. The purpose of such a statement will be to confirm a PoD's search methodology, to provide clear assurance that the Inquiry's request has been met so far as is reasonable in all of the circumstances and to explain, so far as can be ascertained, what has become of any information which cannot be produced (including, where possible, identification of the last person known to have had access to documents that are no longer held)."

22. POL's search methodology in respect of each of its disclosures was set out in the Annex to the First Interim Disclosure Statement. My intention in sections G – M of the First Interim Disclosure Statement was to set out POL's general approach to the harvesting, searching and the review of documents when responding to Rule 9 Requests received from the Inquiry. In this respect, sections H and I explained the main repositories which POL considered may contain documents of potential

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relevance to the Inquiry and other relevant background in relation to the harvesting, searching and the review of documents in responding to a Rule 9 Request.

23. At paragraph 30 of the First Interim Disclosure Statement, I provided a summary of the hard copy documents held by Oasis on behalf of POL, including the limitations on this repository and the indexing issues affecting some of the items held at these archives.
24. At paragraph 31 of the First Interim Disclosure Statement, I provided an outline of phase 1 of the Unindexed Items Project, which involved the indexing and scanning of 4,766 unindexed items. This exercise was completed on 18 May 2022, while the First Interim Disclosure Statement was being prepared.
25. Phase 2 of the Unindexed Items Project involved reviewing items which were indexed to assess the adequacy of those indices. This phase was approved by POL's Historical Matters Committee ("HMC") on 24 February 2022. Work started on 14 March 2022 and finished on 4 July 2022.
26. Phase 3 of the Unindexed Items Project was concerned with updating the indices of items identified in phase 2 as not being 'adequately indexed'. The proposal for this phase was initially considered and approved in principle by the HMC on 24 February 2022. The costs and timeline for the phase were subsequently approved on 20 May 2022, after sufficient progress had been made on phase 2 to inform an assessment of how many items were not 'adequately indexed' and would therefore require re-indexing (I note that in the Second Interim Disclosure Statement, I stated that Phase 3 was approved by the HMC on 24 February 2022 and omitted to explain that the costs and timeline were not approved until May 2022 – this was an oversight and I recognise that the Second Interim Disclosure Statement should have been clearer in this regard).

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27. Phases 4 and 5 of the Unindexed Items Project were approved by the HMC on 20 May 2022.
28. I acknowledge now that it may have assisted the Inquiry's understanding of the Unindexed Items Project if additional detail had been included in the First Interim Disclosure Statement.
29. In any event, I understand that further detail in relation to POL's ongoing indexing exercises was subsequently provided to the Inquiry under cover of HSF's letters dated 5 August 2022, 6 September 2022 and 29 September 2022. I also set out in the Second Interim Disclosure Statement (and in this statement) further information in relation to the project in order to assist the Inquiry in forming a complete picture of the indexing activities that have been undertaken to date and those which remain to be completed.

E. POL'S CONSIDERATION OF WIDER HARD COPY REPOSITORIES

Question No. 2(b) of Inquiry's 10 November Letter

I refer to the Second Interim Disclosure Statement at [42] – [44]. The Inquiry's Terms of Reference were announced in September 2020 and updated in June 2021. With this in mind, why did POL only consider the contents of their wider hard copy repositories 'from around late in the first quarter of 2022'? Why were these sites not considered earlier, including:

- a. when the Independent Review was announced (June 2020);*
- b. when the non-statutory inquiry was announced (September 2020);*
- c. on receipt of the Inquiry's letter regarding preservation of evidence (27 October 2021) [sic.];*
- d. on conversion to a statutory inquiry (June 2021);*

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e. when the final List of Issues was published (November 2021);

f. on receipt of Rule 9 Request 7 (December 2021); or

g. at any other date earlier than March 2022?

30. Around the time of the Independent Review, responsibility for that process within POL sat with the Historical Matters Business Unit. Declan Salter was appointed as Director – Historical Matters in order to lead this team in August 2020. Around September 2021 I took on an additional responsibility to my Group General Counsel role as the “sponsor” of the Inquiry Project pending an appointment of an Inquiry Director. By this time, my recollection is that a number of steps had been undertaken by the team including obtaining documentation from the relevant business areas in respect of documentation requested by the Inquiry during that period.

31. As the Inquiry will be aware, POL has in recent years undertaken a number of substantial disclosure exercises in the context of the Post Office Group Litigation (*Bates and others v Post Office Limited*), the Employment Tribunal proceedings concerning worker status, *Baker and others v Post Office Limited*, and, subsequently, the Post Conviction Disclosure Exercise ("PCDE") undertaken in connection with potential appeals against criminal convictions. Indeed, in relation to the latter, the process of disclosure is ongoing. I note in this respect that harvesting of certain hard copy materials had been undertaken, in particular in the context of the GLO and the PCDE.

32. As explained at paragraph 34 of my Second Interim Disclosure Statement, POL's approach to harvesting hard copy documents has necessarily been to adopt a balancing exercise between its obligation to provide disclosure to the Inquiry and the cost and time involved in carrying out such exercises, bearing in mind POL's position as a publicly funded entity. In preparing for the process of receiving Rule 9 Requests

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from the Inquiry, POL has gathered many millions of documents which it is considered might be responsive to Rule 9 Requests. POL has focused its searches for documents on the repositories which were considered most likely to contain materials that were relevant to the issues that POL was aware at the time that the Inquiry was investigating and, in particular, the matters addressed in Rule 9 Requests, in order to ensure the timely provision of documents to the Inquiry. As the Inquiry notes in its 10 November 2022 letter, the Inquiry published the Completed List of Issues on 17 November 2021. Prior to that, the totality of the issues that the Inquiry proposed to investigate was not available to POL (the Terms of Reference, issued on 1 June 2021, included only six high-level themes; a Provisional List of Issues was published on 26 August 2021 and was still subject to representations from Core Participants). Additionally, prior to the receipt of Rule 9 Requests No. 7 dated 13 December 2021 and No. 8 dated 17 December 2021, POL had been able to provide comprehensive responses to the Rule 9 Requests received from the Inquiry by conducting searches across its Relativity platform and the electronic data held on POL's systems and making enquiries in respect of materials held at the Postal Museum.

33. As the Inquiry is aware, Rule 9 Requests No. 7 and No. 9 contained requests for historical materials relating to the roll-out of the Horizon system. HSF conducted a number of keyword searches over POL's Relativity platforms in order to identify responsive documents. These keyword searches, however, only returned a very limited number of hits. Further consideration was therefore given by POL to other potential repositories which might, in particular, hold historical documents which may have relevance to the matters addressed in these Rule 9 Requests.
34. In this respect, I note that the Postal Museum and Winchester Oasis sites are utilised by POL for the archiving of historical hard copy documents and hold relatively large

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volumes of such material (141,110 items within the Oasis Indices and 409 cubic meters of storage space – equivalent to roughly 12, 20 foot-long shipping containers - at the Postal Museum, as well as its digital collection which consisted of documents amounting to 352.79 GB of data as at 31 January 2022.¹), when compared with other POL sites.

35. In an effort to locate documents that were relevant to Rule 9 Requests No. 7 and No. 9, HSF made enquiries at the Postal Museum and ran searches over indices of material held at Winchester Oasis. From the searches / enquiries, it became apparent that these two sites held potentially relevant materials. Site visits to these locations were arranged, as outlined in my Second Interim Disclosure Statement at paragraphs 21 and 27. Due to the significant volume of potentially relevant materials held at these sites, and the need to provide timely responses to the Inquiry's requests, POL dedicated its immediate attention and resources to identifying and harvesting documents from these sites.
36. For further context, I note that POL (and HSF) were reliant on the Postal Museum and Winchester Oasis being able to provide HSF with site access in order for them to conduct visits. Sometimes, availability was limited and so it took time to ascertain the relevance of hard copy material. Similarly, and by way of example, in relation to the scanning of relevant materials, at the Postal Museum, a third-party scanning provider had to attend the site (as the Postal Museum does not provide this service in respect of large volumes of documents) and this was also dependent on the availability of site access and the third party provider. At Winchester Oasis, POL was reliant on Oasis for scanning and, as outlined in POL's letters to the Inquiry dated

¹ See paragraphs 29 and 30 of the First Interim Disclosure Statement and paragraphs 17, 18 and 22 of the Second Interim Disclosure Statement.

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12 April 2022, 25 April 2022 and 5 May 2022, there were often delays in the scanning process.

37. From around late in the first quarter of 2022, and in the light of the expanding scope of the Inquiry's requests around that time (for example, the questions contained in Rule 9 Request No. 10, which requested materials not only relating to the Horizon implementation and modifications, but also training, advice and assistance, resolving disputes, bugs and errors, etc), POL (and HSF) took the steps described in my Second Interim Disclosure Statement to further interrogate POL's hard copy document repositories, which were identified, based upon the information available at the time (as to which see paragraphs 45-47 of the Second Interim Disclosure Statement), as potentially containing materials that may be responsive to the requests that the Inquiry had issued.

F. POL'S DOCUMENT RETENTION POLICY

Question No. 2(c) of Inquiry's 10 November Letter

I refer to Annex 3, Row 11 and the First Interim Disclosure Statement at [17] and page 91, paragraph 8.7. In his First Interim Disclosure Statement, Mr Foat notes that historically, POL had a seven year retention policy in relation to documents and records: [17]. Mr Foat refers to this policy again when discussing POL's response to Rule 9 Request 7 dated 13 December 2021 in the First Disclosure Statement at page 91]. This policy is not discussed in the body of the Second Interim Disclosure Statement (we note it is, however, referred to in relation to certain Rule 9 responses in Annex 2). Would you please expand on this policy and its potential consequences for POL hard copy documents that may be responsive to the Inquiry's Terms of Reference or extant Rule 9 requests?

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38. Whilst the principles by which POL defines when and for how long documents should be retained are not matters which fall directly under my responsibility, I understand that POL has a Document Retention and Disposal Policy which sets out in general terms POL's commitment to the proper and lawful retention and disposal of information, including hard copy documents, including for the purposes of litigation and investigations to which POL is a party and to ensure POL's compliance with legal and regulatory retention requirements, including, for example, the Freedom of Information Act 2000 and the Public Records Act 1958. The policy applies to all POL employees and third parties who do business with POL. The current version of the policy has been in place since 13 July 2020, prior to which a previous version of the policy was in place since 27 March 2018 (when the policy appears to have been first introduced).
39. The retention arrangements for specific types of documents at POL differ between areas of the business and by type of document. They are set out in a set of retention schedules, which were first introduced during the second half of 2019 and the first half of 2020. When the retention schedules were first introduced, each area of the business approved a schedule, which set out how the different types of documents that it typically dealt with should be treated for document retention purposes. "Data owners", who were responsible for ensuring the retention schedule for their area remained up-to-date and that it was complied with, were identified for each area of the business.
40. However, I am informed that compliance with the retention schedules is not tracked centrally and that the policy and schedules may not in all instances be implemented effectively. Additionally, following restructurings of the business, not all business areas have a retention schedule. Proposals for a POL-wide programme of improvements to data management and governance were drawn up and presented

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to the Risk and Compliance Committee in the last quarter of 2021 and earlier this year. The programme was sponsored by the Group Chief Information Officer and proposals included the introduction of enhanced policies, training and KPIs for the business, as well as the procurement of new software to improve compliance and reporting on data management. I understand, however, that this programme has been reduced in scope, and that POL continues to assess how best to implement the policy and the schedules. To aid this, a Records Manager and Head of Data Management have been appointed to assist Post Office in managing its data, including its hard copy data and the archiving of such data.

41. The reference to a historical seven-year retention policy in the First Interim Disclosure Statement was made on the basis that the retention period for many (although not all) types of POL documents are subject to a retention period of seven years. Where this is the case, it is reflected in the retention schedules.
42. I would note that, notwithstanding the challenges above, various document holds have also been put in place / supplemented as necessary for the purposes of: the Initial Complaint Review and Mediation Scheme (December 2014); the Group Litigation (April 2016); the Criminal Cases Review Commissioner's review of certain historical prosecutions which began in January 2015; the PCDE in February 2020; and, in May 2021, after POL received notifications of potential claims for malicious prosecution by postmasters whose convictions had been overturned. A POL-wide document hold was put in place for the purposes of the Inquiry on 18 October 2021, via a One Note communication from me which was posted on POL's intranet and sent to all POL employees.
43. In addition to taking steps to preserve documents within POL, during November 2021, POL made requests to a number of its service providers (via email entitled 'Post Office Limited – preservation of data and documents') to preserve

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documentation. However, it was recently brought to the POL Inquiry team's attention that one of its service providers, Verizon, had not been asked to preserve data and documents. I understand that, as such, Verizon had been deleting documents relating to its contract with POL in line with the 14 month retention period contained therein. I understand that as a consequence, recordings of calls made by postmasters to what is now the Branch Support Centre (formally known as the Network Business Support Centre and originally known as the Horizon Helpline) have been deleted from the commencement of the Verizon contract in May 2015 until September 2021. Since identifying this issue, POL contacted Verizon and requested that they cease deleting the recordings referred to above and requested that Verizon cease its destruction of documents relevant to POL. In addition, an exercise is underway to identify whether there are any other service providers who may have documentation that is relevant to the Inquiry who have not been provided with a document preservation notice. POL will update the Inquiry in correspondence in due course of the outcome of that exercise.

**G. POL'S RELIANCE ON HARD COPY COMMUNICATIONS BETWEEN 1995 – 2000
AND RELIANCE ON ELECTRONIC COMMUNICATIONS POST 2000**

Question No. 2(d) of Inquiry's 10 November Letter

The Inquiry assumes that, like many businesses, POL may have relied more heavily on paper-based communication in the period 1995-2000 (letters, faxes, etc), with an increased reliance on electronic communication (emails, etc) thereafter. Would you please address this assumption and, if it applies in relation to POL and its predecessors, explain if this issue was considered by POL as part of the broader 'approach adopted to ensure reasonable steps taken to search potentially relevant hard copy locations (Q1/Q2 2022 to present)' (Second Interim Disclosure Statement,

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section F)? If the issue was considered, please explain how it was incorporated into the approach.

44. For the reasons explained above, it is not the case that POL actively made this assumption. POL is not in a position to confirm definitively that it would have relied more heavily on paper-based communications in the period 1995 – 2000, with an increased reliance on electronic communications thereafter. I understand from a current POL employee who worked in the security team in the mid-1990s that there was a considerable amount of paper-based communication but also that electronic communications (i.e. email) were in use around that time and floppy disks were also used to transfer material. For context, I understand that HSF has conducted searches for email data held in POL's Relativity databases in the period from 1995 to 2000 (including across the entire GLO and Inquiry databases, as well as the mailbox data of 124 custodians harvested for the purposes of responding to requests received from the Inquiry) and has only identified 63 native emails from this period.
45. As noted above, POL undertook (and continues to undertake) searches for material responsive to the Inquiry's requests with regard to its electronic databases (which, as noted at paragraph 31 above, already contained material which had been harvested from hard copy document repositories for the purposes of the GLO and the PCDE) and, where it was considered unlikely that responsive documents may be contained on those electronic databases, its hard copy document repositories.

H. WORK PRODUCT BY PETERS & PETERS AND WOMBLE BOND DICKINSON

Question No. 2(e) of Inquiry's 10 November Letter

The Second Interim Disclosure Statement refers to a work product by Peters & Peters and Womble Bond Dickinson – see [42] and [45]. Would you please provide this work product to the Inquiry?

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46. POL is today producing to the Inquiry the Electronic Documents Questionnaire from the Group Litigation, as well as the Disclosure Management Document and the Addendum Disclosure Management Document (together with the annexures) from the PCDE.
47. In addition to the above documents, additional work product created by Peters & Peters exists, though that work product is privileged and post-dates the cut-off date of 26 February 2020 in POL's general waiver of privilege. As such, POL respectfully asserts its rights to rely on the privileged nature of these documents to withhold disclosure of this work product from the Inquiry at this time. If it assists the Inquiry, and without waiving privilege over the remaining work product, it generally comprises lawyers' working documents, legal advice and reports which were either prepared by lawyers, or co-prepared by lawyers and individuals within POL (either in order to provide instructions to lawyers or for POL's internal reporting purposes). These documents were generally created for the purposes of an assurance process which was conducted by Peters & Peters in order for POL to assure itself that there were no further materials that needed to be collected for the PCDE at that stage, or for the criminal appeals that were ongoing at that time (i.e. in the second half of 2020 and in early 2021). The documents typically include information relating to the hard copy sites searched for the purposes of the assurance exercise, the types of materials that the sites held and advice to POL on the discharge of its disclosure obligations. A small number of the documents also include information relating to assurance work that HSF and Womble Bond Dickinson carried out in connection with the Historical Shortfall Scheme and *Baker and others v Post Office Limited*, as well as other work carried out in connection with potential civil claims arising from the quashing of criminal convictions in the appeals that were ongoing at the time.

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Such civil claims are the subject of ongoing dispute resolution processes or remediation activities.

I. EIGHT ADDITIONAL FILES

Question No. 2(h) of Inquiry's 10 November Letter

Your letter dated 4 November 2022 notes that 'there are also eight files which were originally identified during POL's hard copy document collection in July 2022 as requiring scanning in order for their relevance to the Inquiry's Terms of Reference to be assessed', but that these were not in fact scanned due to human error. Would you please advise the work that remains in relation to those files, how many documents are captured within the eight files and why this error was not discovered until early November 2022?

48. I am informed that the eight files referred to in HSF's letter dated 4 November 2022 are, in fact, a combination of (a) five files which had been inadvertently omitted from scanning (in a context of a hard copy disclosure process which has involved many thousands of documents (from several hundred files) being scanned and reviewed) and (b) three files which were brought to HSF's attention more recently. I address each of these in more detail below.

Five files missed for scanning

49. I understand that the five files referred to above were initially identified for scanning through two separate processes:

(A) Two files were responsive to keyword search terms applied across the Postal Museum archives in connection with certain requests contained in Rule 9 Requests No. 13 and No. 15. A request was

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made by HSF on 14 July 2022 for these files to be scanned to allow for further electronic review.

(B) Three files were identified by the Postal Museum during the Postal Museum's routine appraisal process (which considers whether a document belonging to POL is appropriate to be stored at the Postal Museum, based on the requirements of the twenty-year rule in the Public Records Act – i.e. that the records are of historical value such that they should be transferred to the National Archives). As part of this process, the Postal Museum considered that the three files potentially contained documentation that was relevant to the 'Horizon' system. The Postal Museum informed HSF of these three files in early July 2022. As a result, HSF requested (on 14 July 2022) that these three files be scanned to allow for further electronic review.

50. Notwithstanding HSF's request that these files be scanned during the course of July 2022, the five files were identified as missing from POL's Relativity platform in late October 2022. This oversight was discovered during an exercise carried out by HSF to verify digital file references listed on Relativity against those included in scanning requests, including the scanning requests sent to the Postal Museum in July 2022. POL accordingly made arrangements for these five files (comprised of 192 individual documents) to be scanned as a priority, with electronic copies uploaded onto its Relativity platform in early November 2022.
51. The 192 individual documents referred to above have been reviewed by HSF and I understand that one of the documents (which relates to phase 2) is in the process of being prepared for production on the basis that whilst not strictly relevant to a Rule 9 Request, it may be 'of interest' to the Inquiry in respect of Rule 9 Request No. 9.

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Three additional files

52. I understand that, separate to identifying the five files described in paragraphs 49 to 51 above, POL provided HSF on 14 October 2022 with a list of documents from the Postal Museum which had been created as part of the Postal Museum's appraisal process, as to which see paragraph 49(B) above ("Postal Museum's Appraisal List"). HSF reviewed the Postal Museum's Appraisal List and identified that three of the files recorded on the list had not previously been brought to HSF's attention.
53. As a result, HSF requested (on 2 November 2022) for these three files to be scanned and uploaded onto POL's Relativity platform. HSF has completed the review of these files and concluded that none of the documents are responsive to existing Rule 9 Requests.

J. DOCUMENTS IDENTIFIED AT CHESTERFIELD, SWANSEA, BIRMINGHAM MIDWAY AND BELFAST OASIS

Question No. 2(g) of Inquiry's 10 November Letter

Your 4 November 2022 letter provides an update in relation to paragraph 73(a) of the Second Statement. In particular, pages 3 and 4 of the letter note that POL has identified additional boxes at Chesterfield that were not transferred to Oasis Winchester in August 2022 with the other files. Why were these files not transferred with the others that were transferred in August 2022, and why have they only now (i.e. as at early November 2022) come to POL's attention?

54. I address the Inquiry's question in respect of the Chesterfield site below. As noted at paragraph 5 of this statement, additional documents have also been identified at the Swansea and Birmingham Midway sites. I also address the position in respect of these sites in this section as well as the items found at Belfast Oasis.

Basis for statement in Second Interim Disclosure Statement regarding Chesterfield

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55. Since the production of the Second Interim Disclosure Statement, it has been brought to my attention that the contents of paragraph 73(a) of the Second Interim Disclosure Statement contain an inaccuracy. In that paragraph, I noted that the exercise of removing all remaining items stored at the Chesterfield facility (on the third floor and in the annex, which are the archives described as 'general', 'agent' and 'security-specific') and relocating them to Winchester Oasis was completed on 26 August 2022. I also noted in Annex 1 to the Second Interim Disclosure that the entire content of the above listed archives had been moved to Winchester, meaning that no materials remained at the aforementioned areas at the Chesterfield site.
56. In the Second Interim Disclosure Statement, I noted at paragraphs 3 and 13 that, in order to inform the contents of the statement, I was reliant upon the instructions that I and POL's in-house lawyers received from our colleagues in the business and those accountable for data regarding documents held by POL. With respect specifically to the statement at paragraph 73(a) and Annex 1, I relied upon information that was provided to me by the Inquiry Project Team, whose role is to coordinate activity within POL in connection with its support of the Inquiry. Whilst the Inquiry Project Team is not directly responsible for POL's data management, it does coordinate with other departments within POL to assure itself that the data landscape is understood and that any materials potentially relevant to the Inquiry can be located.
57. On 3 November 2022, I was made aware that the information I had relied upon in relation to the contents of the Chesterfield facility was incorrect. Since then, I have sought an explanation from the Inquiry Project Team as to the circumstances which led to the inconsistency, and I set out below details of how the error came to be made.

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58. As part of phase 4 of the Unindexed Items Project, POL took steps to move hard copy documents archived at Chesterfield to Winchester Oasis for indexing. In this respect, I understand that a call took place on 25 August 2022 between POL's Indexing Project Team and Oasis (who provide document storage for POL), which led POL's Indexing Project Team to understand that after the final collection scheduled for 26 August 2022 had been completed, both the Chesterfield third floor data room, and annex (which housed the general and security archives) would be cleared of all materials, save for such things as personal belongings, stationery, etc. As Chesterfield is a working administration site, the site itself continued to hold everyday working documents. However, as a result of the above, the view was formed that there were no materials which might be relevant to the Inquiry which remained in storage at Chesterfield (i.e. the site would, given it is a working office, continue to hold everyday materials but it was not considered these would likely be relevant to Rule 9 Requests which may be received from the Inquiry).

59. I understand that as a result of the discussion described above in paragraph 58 above, the Indexing Project Team informed the Inquiry Project Team of this understanding. This position (that no materials remained at the aforementioned areas at the Chesterfield site) was subsequently communicated to me in the course of preparing the Second Interim Disclosure Statement and formed the basis of the statement at both paragraph 73(a) and Annex 1.

Inaccuracies in relation to the statement in Second Interim Disclosure Statement regarding Chesterfield

60. It has since transpired that, in fact, not all potentially relevant materials which were stored at Chesterfield had (after the scheduled final collection on 26 August 2022) been cleared from the Chesterfield facility. In particular:

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- (A) A total of **52** boxes had apparently been left in a locked room in the annex at Chesterfield. This was as a result of a POL employee (a Security Analyst whose role is to analyse external crime trends and liaise with law enforcement and other external partners) instructing Oasis to leave behind items in the annex (including the locked security room) which were thought by the Security Analyst to be personal items. These items were identified by an individual in the Security Team on 20 October 2022 as part of a handover of the annex to Royal Mail Group and the Indexing Project Team learned of this on 27 October 2022. The 52 boxes were picked up by Oasis on 28 October 2022 and moved to Winchester Oasis.
- (B) Following the discovery of the 52 boxes, on 31 October 2022, a Data Governance Lead at POL requested photos from the Security Analyst of the empty rooms at Chesterfield. On 1 November 2022, following a review of the photos, an additional **31** boxes were identified in the third-floor data room and the annex. These 31 boxes had been added to the third-floor data room and annex for storage at Chesterfield following the collection that took place on 26 August 2022. The 31 boxes were picked up by Oasis on 1 November 2022 and moved to Winchester Oasis.
- (C) On 31 October 2022, a POL employee alerted the Data Governance Lead (who in turn informed the Inquiry Project Team and myself) to an additional storeroom on the ground floor of Chesterfield. On 1 November 2022, a further **21** boxes were discovered in this storeroom on the ground floor at Chesterfield. These documents were not moved to Winchester Oasis in August 2022 (phase 4 of

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the Unindexed Items Project) because they were not part of the third-floor data room or annex and the Indexing Project Team were not aware, when they were defining the scope of their project, of the ground floor storage area where the 21 boxes were stored.

(D) Following the discovery of the items in paragraphs 60(A) – (C) above, POL conducted a further physical inspection of the Chesterfield facility. As a result of this inspection:

- a. **seven** boxes were identified on the first floor in the General Administration area. The teams responsible for the area where these seven boxes were identified are arranging for these documents to be scanned and indexed at Chesterfield and they will then be sent to Winchester Oasis. POL's business has been asked that the items be ready for transfer to Winchester Oasis by 9 December 2022.
- b. **three** roller-fronted cabinets in the General Administration area on the second floor of the Chesterfield archives were identified as containing approximately **26** boxes and assorted binders. The teams responsible for these cabinets have been instructed to arrange for their contents to be indexed on site and then transferred to Winchester Oasis. POL's business has been asked that the items be ready for transfer to Winchester Oasis by 9 December 2022.

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c. 12 boxes were discovered in the General Administration area on the second floor 10 of the boxes contained paperwork that documents the volume and value of cheques that have allegedly not been processed by the appropriate cheque processing supplier due to being lost or missing in transit and are not, I understand, considered to be likely to be relevant to the Inquiry's Terms of Reference. Two of the 12 boxes relate to client settlements (which have been considered by the business not to be relevant to the Inquiry) had been kept for audits. As POL retains electronic copies of the material in these two boxes, the hard copy documents were destroyed. The team responsible for the remaining ten boxes has been asked to index the items on site and then transfer them to Winchester Oasis. POL's business has been asked that the items be ready for transfer to Winchester Oasis by 9 December 2022.

61. The documents referred to at paragraphs 60(D)(a) – (c) were not moved to Winchester Oasis in August 2022 (as part of phase 4 of the Unindexed Items Project) because they were not part of the third-floor data room or annex and the Indexing Project Team were not aware of their existence when scoping the Unindexed Items Project.

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62. Neither the Indexing Project Team, the Inquiry Project Team, nor myself were aware of the existence at Chesterfield of any of the items referred to in paragraphs 60 (A) – (D) above at the time that I made the Second Interim Disclosure Statement.
63. I understand from the Inquiry Project Team that on 28 October 2022 and 1 November 2022, the items referred to at paragraphs 60(A) – (C) above were relocated to Winchester Oasis. This resulted in 105 boxes being moved to Winchester Oasis.² The items referred to at paragraphs 60(D) remain at Chesterfield but, as indicated at paragraph 60(D), will be sent to Winchester.

Items listed at paragraphs 60(A) – (C)

64. On 4 November 2022, a team of HSF lawyers attended Winchester Oasis to review the 105 boxes referred to at paragraphs 60(A) – (C) above for potential relevance to Rule 9 Requests received to date. Of these 105 boxes, HSF considered that 21 boxes appeared, at this initial review stage, to contain material potentially responsive to Rule 9 Requests which predominantly related to phases 3 and 4 of the Inquiry. HSF's initial review did not identify at that stage any material in the 105 boxes as being potentially responsive to phase 2 of the Inquiry.
65. The materials from the 105 boxes that were considered by HSF to be potentially responsive to the Inquiry's Terms of Reference have been scanned and reviewed for relevance to Rule 9 Requests up to and including Rule 9 Request No. 30 dated 18 November 2022. It is anticipated that relevant hard copy documents will be produced to the Inquiry by no later than 2 December 2022. This amounts to approximately 177 documents, eleven of which concern phase 3 of the Inquiry, the balance relating to phase 4 of the Inquiry.

² There were 104 boxes found at Chesterfield (83 boxes on the third floor and annex and 21 boxes in the ground floor cupboard). However, due to one box being overfilled, this was split between two boxes bringing the total number of boxes moved to 105 boxes.

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66. HSF was unable to review certain electronic material within the 105 boxes, at Winchester Oasis at the time of their visit. This consisted of:

- (A) Five boxes of CDs (most of which I understand are encrypted);
- (B) Three boxes of VHS recordings;
- (C) Five boxes of MiniDV tapes and audio cassette tapes; and
- (D) Two boxes of PC back up cassettes.

(together, the "**Electronic Materials**")

67. There were 15 boxes that contained Electronic Materials. 14 out of the 15 boxes of Electronic Materials were sent to HSF. As an initial step, POL has initially instructed HSF to carry out a sampling exercise in respect of the Electronic Materials listed at paragraphs 66(A) – (C) to ascertain the likelihood of them being relevant to the Inquiry's Terms of Reference. This has involved sourcing additional hardware to attempt to access the materials (including those within 66(D)) as neither POL nor HSF had the required equipment readily available. From the reviews that have been carried out to date, I now understand that in respect of paragraph 66(B), the majority of the VHS recordings can be ruled out for relevance based on their labelling not indicating the items will be responsive to Rule 9 Requests. This leaves approximately 20 VHS tapes to review which are either unlabelled or in respect of which the labelling is ambiguous. In respect of the items listed in paragraph 66(C) these have been assessed and none have been identified as being responsive to Rule 9 Requests. In respect of the items listed in paragraph 66(A) and (D), POL is continuing to make enquiries in relation to their contents. Following the completion of these exercises, and subject to the necessary materials being available and accessible, POL will be better placed to decide what steps, if any, are appropriate in

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respect of these materials. I note however that a significant proportion of the CDs identified to date are password-protected and it may not be possible to review their contents.

68. I understand that the remaining (fifteenth) box contains a combination of hard copy documents (and CDs). HSF reviewed this hard copy material and found none of it to be responsive to Rule 9 Requests. The CDs from this box will be sent to HSF and dealt with in the same manner as that which is outlined above (i.e. there will be sampling carried out on the same).

Items listed at paragraphs 60(D)(a) – (c)

69. From POL's initial high-level review of these items, they do not appear to be relevant to the Inquiry's Terms of Reference and instead appear, from an initial analysis, to pertain broadly to personnel matters. For completeness, POL is nonetheless arranging for these items to be indexed, following which HSF will review the indices to identify material that is potentially relevant to the Inquiry.

Swansea and Birmingham Midway

70. On 4 November 2022, I updated the Group Executive at POL in relation to the discovery of the newly-identified boxes at the Chesterfield archives and the need for POL business areas to better manage the hard copy documents and respond accurately to the Inquiry Team so that POL can comply with its legal obligations. This prompted a fellow member of the Group Executive to make enquiries to check the sites in their area. During the course of those checks, additional documents were identified at the Swansea and Birmingham Midway sites. I address each of these sites separately below.

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Swansea

71. I referred to the Swansea site in my Second Interim Disclosure Statement as a Site Considered for Further Review (at paragraph 47). I noted (at paragraphs 49, 54 and 55 of the Second Interim Disclosure Statement) that the material that was identified as being potentially relevant to the Inquiry's List of Issues from the Swansea site had been scanned and processed onto Relativity and, where deemed relevant to an existing Rule 9 Request, produced to the Inquiry. I also noted in Annex 1 to the Second Interim Disclosure Statement that the Swansea site no longer had any hard copy documents in storage (albeit I note now that it remains an active Supply Chain Site and, therefore, continues to hold day-to-day materials). I have subsequently been informed that it has also previously been used as an Occupied Administration Site and the function room there is still used, from time to time, by POL network managers.
72. The items recently identified at this site were found on 9 November 2022, in a first floor administration office (i.e. a day-to-day work area). This area had been searched for the purposes of the Inquiry previously, but I understand that the items identified were not considered at the time to be relevant to the Inquiry. I have been informed that they amount to one box and that the materials appear from a high-level review to be copies of confidential emails, notebooks and diaries.
73. POL arranged for the materials identified at Swansea to be sent to HSF on 15 November 2022. The documents are in the process of being reviewed. Certain material is anticipated to be provided to the Inquiry by no later than 2 December 2022. The balance of the material is not, at present, considered to be responsive to a Rule 9 Request, but may be of interest to the Inquiry. Where relevant, this material will be produced to the Inquiry.

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Birmingham Midway

74. I do not make explicit reference to the Birmingham Midway site in my Second Interim Disclosure Statement. This is because this site was not a Site Considered for Further Review, as it was considered by POL personnel who use this site to be unlikely to contain documents other than those which concern the everyday operation of the site.
75. The documents found at the Birmingham Midway site were identified on 8 November 2022 and consist of a trolley that was stored in a vault on behalf of POL's Security Team. I understand that the trolley contains 10 mail sacks of dated receipts for the Brookside branch. Additional paperwork related to the Security Team (pre-GLO, the team carried out investigations at POL, post-GLO, the team no longer carried out these investigations) was found in a cupboard in the administration area of Birmingham Midway. I am informed that this paperwork is estimated to amount to approximately 20 boxes of material.
76. The Security Team have been instructed to index the materials identified at Birmingham Midway (by no later than 2 December 2022) and then send the materials to Winchester Oasis. Once indices for these materials are available, HSF will review them in order to identify any documents potentially relevant to extant Rule 9 Requests.

Belfast Oasis

77. In the Second Interim Disclosure Statement, at paragraph 14(a)(i), I noted that the only Oasis site POL was using to store materials was Winchester Oasis. This statement was accurate at the time I made the statement. However, I understand that on 1 November 2022, 12 boxes were moved from POL's Londonderry site to Belfast Oasis. The items are currently in the process of being moved to the

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Winchester Oasis site but have already been indexed onto the Oasis Indices. HSF will, where appropriate, review the indices for potentially relevant material and, where relevant, documents will be produced to the Inquiry.

K. HARD COPY DOCUMENT REVIEWS OUTSTANDING

Question No. 2(f) of Inquiry's 10 November Letter

The Inquiry has found Section G – ‘The Re-Indexing/ Indexing / Omnidox Exercise (September 2020 to Present)’ of the Second Interim Disclosure Statement difficult to follow, in particular [77] – [78] (‘Further review for the Inquiry’), as it requires a good understanding of the phases of the Unindexed Items Project (and/or for the reader to cross reference this part of the Second Interim Disclosure Statement to earlier parts where the work is discussed). The phases themselves do not appear to be chronological (ie while they are named 1 to 5, some phases appear to be happening concurrently / are not dependant on the completion of earlier phases). The use of the word ‘phase’ for the project is also confusing, given the Inquiry’s work is also in phases.

78. The Second Interim Disclosure Statement set out the five stages (or 'phases') of the Unindexed Items Project and explained the work that was/is being carried out under each stage of the project. The use of the word 'phase' correlates with the terminology that POL has itself attributed to the various work streams arising from the Unindexed Items Project. The Inquiry is correct in its observation that certain work carried out under the stages of the Unindexed Items Project has occurred concurrently and, therefore, each stage of the Unindexed Items Project has not always been dependent on the completion of the prior stage.
79. I included in the Second Interim Disclosure Statement the background to the stages of the Unindexed Items Project to assist the Inquiry in its understanding of the work

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that POL had been/is undertaking to index certain hard copy documents and review, where appropriate, certain material for relevance to the Inquiry's Rule 9 Requests.

80. The Inquiry has requested that POL provide a clearer explanation in respect of the work that remains outstanding in relation to all hard copy document reviews and when POL envisages completing this work. I have set out below a table that summarises the hard copy document reviews that are currently being undertaken. I go on to address the Inquiry's Questions 2(f)(a) to 2(f)(f). The reviews set out in the table are classified as hard copy document reviews as they predominantly relate to documents that originate from hard copy document archives. For the avoidance of doubt, POL also continues separately to progress electronic document reviews (classified as such as they largely concern documents of a soft copy nature), however these are not addressed in the below table.

No.	Review	Review description
1.	Ongoing review of indices related to the Unindexed Items Project	<p>The indexing, re-indexing and indexing of items subject to the Escalation Process has been completed by POL. POL has carried out an internal quality assurance exercise (akin to proof reading) over items indexed/reindexed as part of stage 3 (re-indexing) and stage 4 (indexing) of the Unindexed Items Project. This was completed by POL on 25 November 2022. POL is also in the process of carrying out a more formal quality assurance exercise in respect of these items. This process is still subject to scoping and, as such, POL is not in the position to confirm when this process will be completed.</p> <p>The review of the material in the indices by HSF naturally follows the completion of the indexing/re-indexing and any quality assurance exercise. HSF's review of documents indexed/re-indexed and quality-assured to date as part of the Unindexed Items Project is, for the majority of items,</p>

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No.	Review	Review description
		<p>nearing completion. That is save for the review of documents subject to the formal quality assurance exercise, which, as above, is on-going and the items which I refer to at row 2 of this table below.</p> <p>There are 32 items that HSF has requested from indices it has received, but which HSF have not yet reviewed. Once received, the 32 items will be reviewed for relevance against existing Rule 9 Requests. Any relevant material will be produced to the Inquiry as soon as possible. From an initial review, 28 of the items appear to be potentially relevant to phase 4 of the Inquiry with four potentially relating to phase 3 of the Inquiry.</p> <p>As set out further at paragraph 109 of this statement, I understand from HSF that the documents referred to in HSF's letter dated 4 November 2022 under the sub-heading 'Phases 3 [(re-indexing)] and 4 [(indexing)] of the Unindexed Items Project', are anticipated to be produced to the Inquiry no later than 2 December 2022. Of these, approximately three concern phase 2 of the Inquiry, 12 phase 3 of the Inquiry and 399 phase 4 of the Inquiry.</p> <p>I also understand from HSF that documents that were reviewed by HSF at Winchester Oasis (that originated from indices in which HSF considered the material to be potentially responsive to the Inquiry) on 15 November 2022, resulted in approximately 7 boxes and 3 files being sent for scanning and uploading to Relativity. These documents will be subjected to a further review against existing Rule 9 Requests and, where relevant, will be produced to the Inquiry. Initial analysis suggests that the items that were sent for scanning are likely to contain material responsive to Request No. 14 (Question 42) and Request No. 10 (Question 12) (phase 4 of the Inquiry).</p>

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No.	Review	Review description
2.	Fujitsu Reports contained on two CDs identified as part of Escalation Process	<p>As explained in HSF's second letter of 24 November 2022, POL has recently identified two CDs containing various Fujitsu reports concerning the period from 2002 to 2006. These CDs were originally held at POL's Chesterfield archives until they were recently moved to the Oasis archives in Winchester as part of the 'Lift and Shift' exercise described at paragraph 73(a) of the Second Interim Disclosure Statement. The CDs contain a total of 39,678 documents, which reduces to 36,452 once duplicate documents have been discounted. An initial pool of 20,240 keyword responsive documents of potential relevance to Rule 9 Request No. 10 have been identified for review. I am aware that the Inquiry has separately written to POL requesting various confirmations in respect of these documents and that it has requested a response be provided by no later than 10am on Wednesday, 30 November 2022.</p>
3.	105 boxes identified at Chesterfield and primarily reviewed at Winchester Oasis on 4 November 2022 and referred to in paragraphs 64 – 68 of this statement	<p>All hard copy documents identified as being potentially responsive to Rule 9 Requests have been scanned and the review of those documents is complete. POL expects to be able to provide responsive documentation to the Inquiry by no later than 2 December 2022. This will be approximately 127 documents which largely concern Rule 9 Requests relating to phase 4 (118) as well as ten documents that concern phase 3 of the Inquiry (one document is relevant to phases 3 and 4 of the Inquiry).</p> <p>As explained in more detail at paragraphs 66 – 68, POL is currently in the process of conducting a sample exercise in relation to the electronic materials and intends to write to the Inquiry further in this respect once further details are known.</p>
4.	Chesterfield documents recently	These documents will be sent to Winchester Oasis. As explained in paragraph 60J(D), these documents do not,

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No.	Review	Review description
	identified and referred to in paragraph 60J(D) of this statement	from an initial review, appear to be relevant to the Inquiry's Terms of Reference. Nonetheless, the documents will be indexed, and HSF will review the indices. Where potentially relevant material is identified, that material will be subjected to further review for relevance against existing Rule 9 Requests and, where relevant, produced to the Inquiry.
5.	Documents recently identified at POL's Swansea site (see paragraphs 71 – 73)	<p>HSF conducted an initial high-level review of one box of documents identified at the Swansea site as being potentially relevant to the Inquiry.</p> <p>From this review, a small number of documents were sent for scanning so that they could be reviewed further against existing Rule 9 Requests.</p> <p>It is anticipated that POL will produce seven documents from this review by no later than 2 December 2022: five documents which relate to phase 3 of the Inquiry and two documents which relate to phase 4 of the Inquiry. There are five items which are still in the process of being reviewed though do not appear to contain material responsive to Rule 9 Requests received from the Inquiry. When POL has completed this review, the documents will be, where relevant, produced to the Inquiry.</p>
6.	Documents recently identified at POL's Birmingham Midway (see paragraphs 74 – 76)	<p>Approximately 20 boxes and ten mail sacks have been identified at Birmingham Midway as potentially relevant. These documents will be indexed and transferred to Winchester Oasis.</p> <p>HSF will review the indices. Where potentially relevant material is identified, that material will be subjected to further review for relevance against existing Rule 9 Requests and, where relevant, produced to the Inquiry.</p>

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No.	Review	Review description
7.	Documents recently identified at Belfast Oasis	As set out in paragraph 77, 12 boxes were moved to Belfast Oasis from Londonderry on 1 November 2022. These items are currently in the process of being moved to the Winchester Oasis site. The items have been indexed and HSF will, where appropriate, review the indices. Where potentially relevant material is identified, that material will be subjected to further review for relevance against existing Rule 9 Requests and, where relevant, produced to the Inquiry.
8.	Review of 5 files appraised by the Postal Museum which were not scanned	This review is complete. As set out at paragraphs 49 – 51 of this statement, five files (consisting of 192 documents) which POL requested for scanning from the Postal Museum in July 2022 were missed in the scanning process. HSF has reviewed these items and determined that one of these documents should be produced given its relevance to phase 2 of the Inquiry. POL expects to be in a position to produce that document by 2 December 2022.
9.	Review of three additional Postal Museum appraised files	As explained in paragraphs 52 – 53 above, three files that were the subject of the Postal Museum's appraisal process were identified as requiring review against extant Rule 9 Requests. That review is now complete and none of the documents were responsive to Rule 9 Requests.
10.	Documents from Finsbury Dials	Subject to the further assurance exercise I set out below, the review of the documents identified in the steps addressed at paragraphs 83 – 86 of this statement from Finsbury Dials is complete and no documents have been identified as responsive to Rule 9 Requests.
11.	Horizon files provided by RMG	POL is currently engaged in a process to scan and upload 78 files which were recently identified (by RMG) as relevant to Horizon to Relativity for review.

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No.	Review	Review description
		<p>It is anticipated the documents will be scanned by 30 November 2022 and POL will produce any responsive documents as soon as it is possible thereafter.</p>
12.	Rule 9 Request No. 28 (Question 2)	<p>I understand that HSF has requested that the Postal Museum provide it with any copies of POCL minutes it holds dated from the mid-1980s to the mid-1990s (for the purpose of Q2 of Rule 9 Request No. 28).</p> <p>POL also intends to review the Horizon files provided by RMG (described at row 11 above) for POCL minutes, alongside carrying out further electronic searches.</p>
13.	Omnidox Review	<p>The Omnidox review is ongoing. It is anticipated that the final production of relevant documents to the Inquiry will be made on or before 9 December 2022 (as per the indication I gave in relation to the same in the Second Interim Disclosure Statement).</p>
14.	Identification of hard copy documentation gathered as part of the GLO	<p>POL was yesterday notified by its lawyers in the GLO, Womble Bond Dickinson, that they had identified a further batch of five boxes of hard-copy materials relating to the GLO in the course of Womble Bond Dickinson's business-as-usual archiving of physical files. The discovery of these items prompted Womble Bond Dickinson to carry out further investigations which identified a VHS cassette and some material that had already been archived as being hard copy documentation that may be relevant to the Inquiry. I understand it is possible that such documentation already exists on the Relativity platform constituted as part of the GLO, however it is not possible to confirm the position without further analysis. In any event, I understand that based on the information available at present, it does not appear that any of the documentation relates to phase 2 of the Inquiry.</p>

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No.	Review	Review description
		POL will take steps to request that Womble Bond Dickinson gather the documentation and i) take steps to assess whether it is on POL's Relativity platform and/or ii) arrange for it to be scanned and uploaded to Relativity. HSF will then consider such documentation and provide any responsive documents to the Inquiry as soon as possible.

81. I address below each of the specific questions set out in paragraph (f) of the Inquiry's 10 November Letter below.

Question No. 2(f)(a)(i)-(iii) of Inquiry's 10 November Letter

How much work remains in relation to the 'upload and production of material identified from Sites Considered for Further Review]: [54] – [57]. In responding, please could you distinguish between:

- i. harvesting work;*
- ii. review work; and*
- iii. work that is required on receipt of additional Rule 9 requests (ie Requests after Request No. 26).*

82. I confirm that, save for the sites that I refer to below, POL is not currently in the process of harvesting documents from any of the Sites Considered for Further Review. In line with paragraph 57 of the Second Interim Disclosure Statement, POL will continue to consider whether it is appropriate and reasonable to conduct any further searches of these sites for documents requested under any future Rule 9 Requests.

Finsbury Dials

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83. At paragraphs 54 and 57 of the Second Interim Disclosure Statement, I noted that potentially relevant material identified from the Sites Considered for Further Review had been scanned and processed onto Relativity, save for a small number of documents which were not considered to be relevant to phase 2 of the Inquiry and which were in the process of being harvested.
84. The reference to the small handful of documents at paragraphs 54 and 57 of the Second Interim Disclosure Statement were to documents that originated from Finsbury Dials. The harvesting of the small handful of documents has now completed, and they have been processed onto Relativity and reviewed. These documents have been reviewed in full for relevance to the Rule 9 Requests, however, no responsive materials were identified.
85. During the course of harvesting the documents referred to in paragraphs 83 – 84 above, POL provided HSF with an Excel spreadsheet that listed some of the documents stored in the Finsbury Dials' basement. HSF identified from this list a small number of documents of potential relevance to the Inquiry's Terms of Reference. HSF referred to these documents in its 4 November 2022 letter in the first paragraph under the sub-heading 'Additional digitisation of hard copy documents'.
86. Save for two documents in respect of which POL is unable to locate copies, all of the documents identified at Finsbury Dials in the exercise referred to in paragraph 85 above have now been harvested and uploaded to Relativity. Of the documents uploaded to Relativity, no documents have been identified as relevant to extant Rule 9 Requests. As I set out below, Finsbury Dials will be subject to a further assurance exercise and, as such, any material that comes to light will be considered, and where appropriate, reviewed for relevance to the Inquiry.

Chesterfield

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87. As explained above, at the time of filing the Second Interim Disclosure Statement, I had understood that the review and harvesting of documents from this site was complete. However, as I explain in section J of this statement, I now understand that that is not the case. Further details in relation to this review and harvest work is addressed in section J and in the table at paragraph 80 of this statement.

Swansea

88. As explained at paragraph 71 – 73 above, POL is continuing to review a small number of documents that were identified at the Swansea site on 9 November 2022.

Londonderry

89. As set out at paragraph 77, certain material from Londonderry was recently moved to the Belfast Oasis site and is now being moved to the Winchester Oasis site. The material that is being moved has been indexed and HSF will consider this material in the index and, where appropriate, documents will be produced to the Inquiry.

Rule 9 Requests No. 26 to 30

90. POL provided its responses in respect of Rule 9 Request No. 26 on 25 October 2022 and 27 October 2022 and Rule 9 Request No. 27 on 22 November 2022. As at the date of this statement, POL is not currently reviewing any further documents (hard copy or otherwise) in respect of these Rule 9 Requests but will continue to keep this position under review in the event that it subsequently identifies information or documents relevant to these Rule 9 Requests which has not previously been provided to the Inquiry.

91. In relation to Rule 9 Request No. 28 dated 16 November 2022 (for which a response has been requested by no later than 14 December 2022), in addition to further electronic searches (including across the Inquiry database, which contains the various hard copy documents that POL has harvested to date), POL intends to scan,

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upload to Relativity and review the hard copy documents identified at the Postal Museum concerning the period from 1988 – 1995 for relevant information and documents. I understand that these documents are included in a single lever arch file, consisting of approximately 200 pages. In addition, POL also anticipates conducting targeted searches across the 78 Horizon files provided by RMG once these have been scanned and uploaded to Relativity. Relevant documents identified following these reviews (and other electronic searches) will be produced to the Inquiry.

92. In relation to Rule 9 Requests No. 29 dated 17 November 2022 (for which a response has been requested by no later than 15 December 2022) and Rule 9 Request No. 30 dated 18 November 2022 (for which a response has been requested by no later than 16 December 2022), POL is continuing to consider the approach for identifying relevant information and documents. At this stage, POL does not anticipate that it will be necessary to harvest additional hard copy documents for the purpose of responding to these Rule 9 Requests but will continue to keep this position under careful review.

Question No. 2(f)(b) of Inquiry's 10 November Letter

How much work remains with regards to re-indexing at Oasis and when this will be complete

93. The re-indexing exercise carried out by POL concerned the materials that were listed on the Oasis Indices, but which appeared to not be adequately indexed. These items were identified in stage 2 of the Unindexed Items Project³ and were then re-indexed as part of stage 3 of the Unindexed Items Project.⁴ As set out in the table at paragraph 80, the re-indexing exercise by POL is complete, save for items which

³ See paragraph 70 of the Second Interim Disclosure Statement.

⁴ See paragraph 71 of the Second Interim Disclosure Statement.

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are being considered as part of the quality assurance process being carried out by Oasis over items indexed/reindexed in stages 3 and 4 of the Unindexed Items Project.

94. All indices from the Unindexed Items Project that reflect the items re-indexed (save for those subject to quality assurance checks as set out in paragraphs 95 – 96 below) that are available have now been sent to HSF and have been subjected to initial reviews to identify material which is potentially responsive to Rule 9 Requests. All items from these indices that were identified as being potentially responsive to Rule 9 Requests received to date have been (or are in the process of being) scanned and reviewed. Responsive items have previously been produced to the Inquiry and I understand from HSF that POL should be in a position to provide a further tranche of documents that concern materials relating to 're-indexing' by no later than 2 December 2022.
95. As set out in the table at paragraph 80 of this statement, POL undertook an internal quality assurance exercise over items indexed/reindexed in stages 3 and 4 of the Unindexed Items Project. The last updated index from this quality assurance phase was sent to HSF on 25 November 2022. On 28 November 2022, HSF requested six items which it considered to be potentially responsive to Rule 9 Requests. Once received, the items will then be subjected to a review for relevance against existing Rule 9 Requests and produced to the Inquiry, where relevant.
96. As also indicated in the table at paragraph 80, POL is carrying out a more formal quality assurance exercise with Oasis over items indexed/reindexed as part of the Unindexed Items Project and this process is on-going. Therefore, HSF will review any updated indices from this process and, where relevant material is identified, HSF will request and review the same against existing Rule 9 Requests.

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Question No. 2(f)(c) of Inquiry's 10 November Letter

How much work remains with regards to indexing at Oasis and when this will be complete

The indexing exercise carried out by POL in connection with the Unindexed Items Project concerned the materials that were not listed on the Oasis Indices. These items formed stages 1 and 4 of the Unindexed Items Project.⁵ As set out in the table at paragraph 80, the indexing exercise (stages 1 and 4 of the Unindexed Items Project) by POL is complete, save for items which full part of the quality assurance process being carried out by Oasis over items indexed/reindexed in stages 3 and 4 of the Unindexed Items Project.

97. All indices that reflect the items indexed from stages 1 and 4 of the Unindexed Items Project (save for those subject to quality assurance checks as set out in paragraphs 95 – 96 above) that are available have now been sent to HSF and have been subjected to initial reviews to identify material which is potentially responsive to Rule 9 Requests. All items from these indices that were identified as being potentially responsive to Rule 9 Requests received to date have been (or are in the process of being) scanned and reviewed. Responsive items have previously been produced to the Inquiry and I understand from HSF that POL should be in a position to provide a further tranche of documents that concern materials relating to 'indexing' by 2 December 2022.
98. I note for completeness that consideration is currently being given by the Historical Matters Committee to indexing the full contents of the files that were scanned as part of stage 1 of the Unindexed Items Project. However, in circumstances where documents not indexed as part of this phase were uploaded to Omnidox (and have

⁵ See paragraphs 66 – 69 and 73 of the Second Interim Disclosure Statement.

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been searched in the manner described in this statement), it is not anticipated that these will need to be reviewed for the purposes of the Inquiry.

Indexing outside of the Unindexed Items Project

99. As referred to above in section J of this statement, POL is in the process of indexing the material recently identified as being held at Chesterfield, Swansea and Birmingham Midway. Whilst it will be unnecessary for HSF to conduct a further review of certain of those indices created (in circumstances where it has carried out a physical review of some of that documentation already), indexing remains to be completed in relation to certain documents recently identified at:
 - (i) POL's Chesterfield site (referred to at paragraphs 60J(D));
 - (ii) POL's Swansea site (referred to at paragraphs 71 – 73); and
 - (iii) POL's Birmingham Midway site (referred to at paragraphs 74 – 76).
100. When the indexing is completed for each of the locations, HSF will complete its review of any indexed items it has not to date physically reviewed shortly thereafter.
101. I note for completeness that POL continues to undertake indexing of its hard copy documents as part of its business-as-usual processes (i.e. outside the scope of the Unindexed Items Project and/or the processes in relation to the recently identified documents at Chesterfield, Swansea and Birmingham Midway), though it is not anticipated that HSF will be required to review such indices.

Question No. 2(f)(d) of Inquiry's 10 November Letter

How much work remains on the Omnidox platform and when this will be complete.

In answering this question would you please explain what 'other items' were added to Omnidox 'at the request of Peters & Peters as part of their role in assisting POL in relation to the PCDE [the Post-Conviction Disclosure Exercise]':[79].

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102. Following the application of the search terms 'Horizon' and 'ICL Pathway' to the 25,058 items originally uploaded to Omnidox, 15,313 of these items were identified for review on Relativity. At the time of making this statement, the first level review of these items has completed, and the second level review is nearing completion.
103. An initial tranche of relevant documents identified from the Omnidox Review was produced to the Inquiry on 14 November 2022. A second tranche was produced to the Inquiry on 25 November 2022. In line with paragraph 83 of the Second Interim Disclosure Statement, POL anticipates providing its final production of responsive documents from this review by 9 December 2022 at the latest. To date, 253 documents have been produced, of which 243 related to phase 3 of the Inquiry and ten related to phase 4 of the Inquiry.

Other items on Omnidox

104. As noted previously, in addition to being used as a repository for documents that were scanned as part of stage 1 of the Unindexed Items Project, the Omnidox platform contains a number of documents that were uploaded for a variety of purposes unrelated to the Inquiry, including retrieval of documents for the PCDE; ongoing disclosure to the Criminal Cases Review Commission; the ongoing criminal appeals in the Court of Appeal (Criminal Division) and Southwark Crown Court; and to assist and provide disclosure to non-POL prosecutors in determining their own post-conviction disclosure duties. The 'other items' added at the request of Peters & Peters were documents such as branch files, branch accounting records, HR records, training records and other files referring to individuals or branches. In line with paragraph 84 of the Second Interim Disclosure Statement, POL is willing to provide the Inquiry with access to these materials (in their current form – i.e. as scanned PDF files) should the Inquiry wish to have access to them.

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Question No. 2(f)(e) of Inquiry's 10 November Letter

How much work remains with regards to the Escalation project? Please break this down by reference to Phase 2, Phase 3 and Phase 4 documents if possible, and the work that would be required should POL receive additional Rule 9 requests.

105. The indexing of the Escalation Items that arose from stages 3 (i.e. documents that required re-indexing) and 4 of the Unindexed Items Project (i.e. documents that required indexing) has completed.
106. All indices that reflect the items indexed as part of the Escalations Project (except for the items subject to the quality assurance exercises referred to in paragraphs 95 – 96 above) that are available have been sent to HSF where they have been reviewed and, where necessary, items have been requested either to be digitised or provided physically for HSF's review.
107. Of the materials identified from the Escalations Project to date, in total, HSF have requested that 26 items be scanned, of which (based on their high level description), it is not considered any are likely to relate to phase 2 of the Inquiry, three items are more likely to relate to phase 3 of the Inquiry and 23 items are more likely to relate to phase 4 of the Inquiry.
108. Going forward, details of all the items subject to the Unindexed Items Project (including any amended as a result of the quality assurance exercises referred to above at paragraphs 95 – 96 above), will be included in the Oasis Indices and their details will therefore be capable of being reviewed (either on a line by line basis or by subjecting that document to word searches) in the event that it is considered hard copy documents may be a likely repository of responsive material in relation to a Rule 9 Request.

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Question No. 2(f)(f) of Inquiry's 10 November Letter

If possible, the amount of hard copy document review work that is left to complete in relation to:

i. Phase 2 documents (based on Rule 9 requests to date). We note there is mention of outstanding Phase 2 documents in your letter dated 4 November 2022 under the heading 'Phases 3 and 4 of the Unindexed Items Project'. Would you please expand on this.

ii. Phase 3 documents (as above).

iii. Phase 4 documents (as above).

109. The documents referred to in HSF's letter dated 4 November 2022 under the heading 'Phases 3 and 4 of the Unindexed Items Project' stem from a review of material in indices relating to those stages of the Unindexed Items Project (rather than reference to phases of the Inquiry) which were not subject to the Escalation Process. Of these documents, it is anticipated that all material that was responsive to Rule 9 Requests will be produced to the Inquiry by 2 December 2022. The documents it is expected will be produced are: three documents concerning Rule 9 Requests relating to phase 2 of the Inquiry; 12 documents which have been considered relevant to Rule 9 Requests relating to phase 3 of the Inquiry; and 399 documents which have been considered to be relevant to Rule 9 Requests relating to phase 4 of the Inquiry.
110. The table at paragraph 80 of this statement sets out all ongoing work in relation to the review of hard copy documents. Given their nature, it is not possible to state categorically when hard copy review work will be complete with reference to the individual phases of the Inquiry (in particular, I understand that it is sometimes the case that items initially considered to be potentially relevant to one stage of the

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Inquiry contain documents which may in fact be relevant to another stage of the Inquiry).

111. As set out above, certain documentation is anticipated to be produced to the Inquiry by no later than 2 December 2022. POL will continue to progress the reviews of the remaining material as quickly as possible.

L. DOCUMENTS INITIALLY REVIEWED AGAINST THE INQUIRY'S TERMS OF REFERENCE.

Question No. 2(i) of Inquiry's 10 November Letter

Your letter dated 4 November 2022 notes at page 4 that 'a small number of documents that have been identified as relevant to the Inquiry's Terms of Reference but which had not been previously reviewed for relevance to Rule 9 Requests' would be produced to the Inquiry on the week commencing 7 November 2022, of which four are responsive to Phase 2 requests. Where were these documents located (please confirm with reference to the Second Interim Disclosure Statement, Annex 1) and on what basis were they not previously reviewed?

112. The documents referred to in HSF's letter of 4 November 2022 under the heading "Supplemental Productions" were produced to the Inquiry on 9 November 2022. Inquiry's Question 2(i) concerns the documents produced by POL on 9 November 2022 under the heading "Sweep-up Reviews". Whereas HSF's letters of 4 November and 9 November 2022 recorded that a total of 16 documents would be produced to the Inquiry under this heading, only 15 documents were in fact identified and produced to the Inquiry. Accordingly, the reference in HSF's letters of 4 and 9 November 2022 ought to have been to "15" documents.
113. Of the 15 documents produced to the Inquiry, six documents were identified from the pool of materials that have to date been provided to POL by Slaughter & May. In case of assistance to the Inquiry, I set out in the below table the Production IDs

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of the six Slaughter & May documents produced to the Inquiry, in each case identifying the specific Rule 9 Request and relevant question in response to which the document was produced.

Production ID (Begin Bates)	Rule 9 Request	Relevant Question
POL-0091316	R9R9 Horizon Roll-Out (2)	R9R9: Q13
POL-0091317	R9R9 Horizon Roll-Out (2)	R9R9: Q21
POL-0091318	R9R9 Horizon Roll-Out (2)	R9R9: Q20
POL-0091319	R9R9 Horizon Roll-Out (2)	R9R9: Q20
POL-0091320	R9R10 Phase 2/3 Documents	R9R10: Q29h
POL-0091321	R9R10 Phase 2/3 Documents	R9R10: Q29h

114. The remaining nine documents were identified from a number of POL's hard-copy document repositories, as set out in Annex I to the Second Interim Disclosure Statement. I set out in the below table each of the Production IDs of the nine hard-copy documents produced to the Inquiry, in each case identifying the specific Rule 9 Request and relevant question in response to which the document was produced and the hard-copy archive from which each document was harvested (along with the corresponding reference to that repository from Annex I to the Second Interim Disclosure Statement).

Production ID (Begin Bates)	Rule 9 Request	Relevant Question	Repository
POL-0091327	R9R10 Phase 2/3 Documents	R9R10: Q12b, Q13	Winchester (Annex I, Part A, Section 7)
POL-0091328	R9R10 Phase 2/3 Documents	R9R10: Q12b, Q 13	Winchester (Annex I, Part A, Section 7)

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Production ID (Begin Bates)	Rule 9 Request	Relevant Question	Repository
POL-0091329	R9R10 Phase 2/3 Documents	R9R10: Q12d	Swansea (Annex I, Part A, Section 10)
POL-0091334	R9R14 Phase 3/4 Documents	R9R14: Q17i	Swansea (Annex I, Part A, Section 10)
POL-0091335	R9R14 Phase 3/4 Documents	R9R14: Q17i	Swansea (Annex I, Part A, Section 10)
POL-0091330	R9R10 Phase 2/3 Documents	R9R10: Q12	Chesterfield (Annex I, Part A, Section 2)
POL-0091331	R9R10 Phase 2/3 Documents	R9R10: Q11, Q12b	Chesterfield (Annex I, Part A, Section 2)
POL-0091332	R9R10 Phase 2/3 Documents	R9R10: Q25	Chesterfield (Annex I, Part A, Section 2)
POL-0091333	R9R10 Phase 2/3 Documents	R9R10: Q12a, Q12b	Bolton (Annex I, Part A, Section 1)

115. HSF's letters of 4 November 2022 and 9 November 2022 explained that each of the 15 documents produced under the heading "Sweep-Up Reviews" had previously been reviewed (and tagged on Relativity) for relevance to the Inquiry's Terms of Reference. HSF's letters also explained that, since they were held in the Inquiry Database in OCR-searchable format, these documents will have been reviewed for relevance to specific Rule 9 Requests to the extent responsive to keyword searches devised by POL. However, having conducted various sweep-up checks, it became apparent that these documents had not been reviewed in their entirety for relevance to all of the Inquiry's Rule 9 Requests, despite their apparent relevance to the Terms

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of Reference. To address this oversight, POL therefore arranged for the review of these documents for relevance to all previous Rule 9 Requests as a priority, and produced the relevant documents identified to the Inquiry on 9 November 2022.

116. For completeness, I note that POL produced to the Inquiry a further (three) documents under the heading "Sweep-Up Reviews" on 15 November 2022. I can confirm that these documents also originated from the materials held at and collected from the Oasis archives in Winchester. In case of assistance to the Inquiry, I set out in the below table the Production IDs of the (three) documents produced to the Inquiry, in each case identifying the specific Rule 9 Request and relevant question in response to which the document was produced.

Document ID	Rule 9 Request	Relevant Question	Repository
POL-0091338	R9R9 Horizon Roll-Out (2)	R9R9: Q15b	Winchester (Annex I, Part A, Section 7)
POL-0091339 / POL-0091341	R9R9 Horizon Roll-Out (2) R9R10 Phase 2/3 Documents	R9R9: Q15b R9R10: Q12	Winchester (Annex I, Part A, Section 7)
POL-0091340	R9R10 Phase 2/3 Documents	R9R10: Q12	Winchester (Annex I, Part A, Section 7)

M. PROVISION OF 90 DOCUMENTS REFERRED TO IN 16 NOVEMBER LETTER

117. HSF's letter of 16 November 2022 set out that POL recently became aware of a set of documents contained on a POL laptop issued to Kathleen Griffin which were responsive to questions relating to training in Rule 9 Request No. 10 and questions relating to audit in Rule 9 Request No. 14. Ms Griffin is a current POL employee and was previously a Network Field Support Manager and led a Regional Field Team of Network Support Advisors (approximately 40 trainers and auditors) who delivered Training and Branch Audit activity across a defined geographical area. As part of that role, in 2010 Ms Griffin undertook a review of POL's training offer for branches. Ms Griffin was asked whether she held any documents that could potentially be

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relevant to the issues being considered by the Inquiry in July 2022. Ms Griffin informed POL and HSF that she had saved documentation in relation to the training review to her "My documents" folder on a laptop issued by POL which she was using at the time of the review. When the laptop was swapped out, Ms Griffin believed the documentation to have been lost as all the relevant subfolders were empty.

118. In October 2022, Ms Griffin was issued a new laptop by POL. Whilst completing the mandatory actions in advance of the laptop migration, the documents that she believed to have been lost reappeared when she moved her "My documents" folder into 'One Drive'. Ms Griffin immediately alerted POL's Inquiry team to the reappearance of the documents, who arranged for a review of 196 potentially relevant documents found there. Of these, 90 documents were identified as responsive to Rule 9 Requests No. 10 and No. 14 and were produced to the Inquiry on 16 November 2022. POL is seeking to understand where the documents were stored and why they reappeared when they did in October 2022. However, POL's investigations are ongoing due to the time that has elapsed and the changes to POL's IT systems since 2012.

N. POL'S FURTHER ASSURANCE EXERCISE

119. As is evident from the above and as set out in previous correspondence sent to the Inquiry by HSF, since providing the Second Interim Disclosure Statement, additional documentation had been identified in relation to several of POL's hard copy document repositories which I had previously been led to understand had been cleared of any material potentially responsive to the Inquiry. Whilst I explain in further detail in this statement the circumstances that led to the discovery of those documents and, where possible, my understanding of how they came to be overlooked, I acknowledge that this is unsatisfactory and extend my apologies for any inconvenience that may have been caused to the Inquiry and other Core

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Participants in this respect. For the avoidance of doubt, POL remains committed to fulfilling its disclosure obligations to the Inquiry in a thorough and timely fashion. In this respect, since the recent discrepancies were brought to my attention, as each area of the business is responsible for their own data and records, I have reiterated to members of POL's Group Executive the importance of managing their data and to comply with POL's disclosure obligations to the Inquiry.

120. In the light of these inconsistencies, POL is commencing an assurance exercise in relation to the contents of its physical site locations. Given the extent and breadth of POL's estate, as set out more fully in the Second Interim Disclosure Statement, the process that POL intends to follow is to proceed with a two-tiered approach in relation to assuring that no documents at these sites have been overlooked. In this respect, I draw the distinction between what I refer to as Archive sites (being the Postal Museum and Winchester Oasis), Occupied Administrative Sites (being Chesterfield, Bolton and Finsbury Dials) and Other Sites.
121. In relation to the Occupied Administrative Sites, these sites will be subject to a physical inspection of their remaining contents to assure that all documentation which may be relevant to the Inquiry has been moved to Winchester Oasis. Whilst the specific details of how the review will be carried out are still in the process of being finalised it is anticipated that a team (supported by an independent search expert engaged to design and assist the process) will attend each of the Administrative Sites and conduct a floor by floor, room by room inspection in coordination with the relevant site manager of that site and the data owners to ascertain the nature of documents stored there. To the extent that items are identified which it is considered may have potential relevance to the Inquiry's Terms of Reference, these will be indexed and then transferred to Winchester Oasis where they will be made available to HSF for review, as appropriate. In addition to this

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process being undertaken in relation to the Administrative Sites, given the documents recently identified at the Swansea and Birmingham Midway sites, these sites will also be subjected to an equivalent physical review.

122. In relation to POL's Other Sites, given their nature, POL intends to conduct a detailed paper-based assurance exercise to understand whether or not those sites, on the same floor-by-floor, room-by-room basis, may still contain documents which might be relevant to the Inquiry. In order to provide assurance that this paper-based exercise in relation to these sites is accurate, it is intended that a physical review will then be conducted at a sample of the Other Sites to ascertain to what extent there is any divergence from the written responses received from the relevant site managers and data owners.
123. Whilst I acknowledge it is unfortunate at this stage for it to be necessary to carry out these further processes, POL is doing so in order to enable the Inquiry to take comfort that hard copy documents have not been missed.

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124. As set out in the Second Interim Disclosure Statement, any exercise in relation to POL's physical sites is challenging given the vast numbers of physical sites (approximately 247) across the UK that POL has a freehold or leasehold interest in and which could potentially hold material of relevance to the Inquiry. POL will progress the exercise expediently and I anticipate will be in a position to commence the review process outlined above in relation to both the Administrative Sites (and the Swansea and Birmingham Midway sites) and Other Sites from early December 2022. Whilst given the size of the sites it is difficult at this stage to anticipate when such processes will be completed, my understanding is that the POL Inquiry Team hopes to be in a position to have concluded the reviews of the Administrative Sites (and the Swansea and Birmingham Midway sites) by early January 2023, with the process in relation to the Other Sites being finalised shortly after.

Statement of truth

I believe the content of this statement to be true.

Signed.  **GRO**

Dated: 30 November 2022