

Fourth Interim Disclosure Statement
12 January 2023

THE POST OFFICE HORIZON IT INQUIRY

Fourth 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**");
- (B) The statement produced to the Inquiry on 18 October 2022 ("**Second Interim Disclosure Statement**"); and
- (C) The statement produced to the Inquiry on 30 November 2022 ("**Third Interim Disclosure Statement**").

3. I have prepared this fourth interim disclosure statement in response to the request made by the Inquiry in its letter dated 6 January 2023 ("**Fourth Interim Disclosure Statement**" and "**Inquiry's January Letter**", respectively). This Fourth Interim Disclosure Statement provides an update on the work currently being undertaken by POL in relation to hard copy document reviews, in accordance with the format requested in the Inquiry's January Letter.

Fourth Interim Disclosure Statement
12 January 2023

4. I am an appropriate person to make this Fourth Interim Disclosure Statement, particularly in the light of the facts that (a) I made the Third Interim Disclosure Statements (to which the Inquiry's January Letter relates) 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.
5. 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 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.
6. 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.

**Fourth Interim Disclosure Statement
12 January 2023****B. DEFINED TERMS**

7. In this statement, I have adopted the defined terms used in the First, Second and Third 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:

Fourth Interim Disclosure Statement	fourth interim disclosure statement in response to the request made by the Inquiry in its letter dated 6 January 2023.
Inquiry's January Letter	the Inquiry's letter dated 6 January 2023.
Master Re-Indexing Index	POL's master index that contains items re-indexed as part of POL's phase 3 (re-indexing) Unindexed Items Project.

C. TABLE CONCERNING POL'S HARD COPY DOCUMENT REVIEWS

8. In line with the request contained in the Inquiry's January Letter, with input from HSF and other service providers assisting POL in providing disclosure to the Inquiry, I set out below an amended version of the table originally included at paragraph 80 of the Third Interim Disclosure Statement. Further to the Inquiry's request, the table includes additional rows to address work streams in relation to hard copy documents not covered in the table at paragraph 80 of the Third Interim Disclosure Statement.
9. For the avoidance of doubt, as the content of the table in columns one to three of the table below is replicated from the Third Interim Disclosure Statement,

Fourth Interim Disclosure Statement
12 January 2023

paragraphs referred to in those columns are references to paragraphs within the Third Interim Disclosure Statement.

Fourth Interim Disclosure Statement
12 January 2023

No.	Review	Review description	Update as at 12 January 2023	Total documents disclosed to date	Production details ¹
1.	Ongoing review of indices related to the Unindexed Items Project	<p><i>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.</i></p> <p><i>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, 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.</i></p> <p><i>There are 32 items that HSF has requested from indices it has received, but which HSF have not</i></p>	<p>There are a number of related workstreams set out in the 'Review description' column. I have therefore split the below update into five sections to address each workstream separately.</p> <p><u>POL's formal external quality assurance exercise of items re-indexed and indexed in the Unindexed Items Project</u></p> <p>Following the completion of the re-indexing and indexing of items, a quality assurance exercise was planned to help ensure that the indexing carried out as part of phases 3 and 4 of POL's Unindexed Items Project was completed accurately, according to the agreed scope.</p> <p>The quality assurance exercise was split into two stages with the intention being that both stages would review a statistically significant sample of the items re-indexed/indexed.</p> <p>I understand that the first stage involved Oasis (POL's storage provider) reviewing 350 items (i.e. files or boxes) of material which had been indexed and 350 items of material which had been re-indexed (700 items in total). The second stage of the quality assurance exercise is to be completed by Peters and Peters and will involve Peters and Peters reviewing 77 items of material which has been indexed and 77 items of material which has been re-indexed (154 items in total).</p> <p>I understand that Oasis has shared a draft of the output for the first stage of the quality assurance exercise and that POL has responded to Oasis with follow-up questions which require further clarification, which Oasis is currently considering. Oasis is due to present to POL the final output of their quality assurance work by 27 January 2023.</p>		

¹ The production number denotes what production the documents identified in this table were made in. The quantity within the identified production may vary given that (i) a different production is required for each Rule 9 Request and some documents within a certain workstream have been produced as relevant to more than one Rule 9 Request and (ii) on some occasions additional documents not related to the below workstreams were also produced with the documents referred to in this table.

Fourth Interim Disclosure Statement
12 January 2023

	<p>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>	<p>Subject to the above completing, Peters and Peters is due to commence the second stage of the quality assurance in the week commencing 6 February 2023.</p> <p>Once the above process is complete, POL will provide any updated indices to HSF, who will review them to assess if they contain material which is potentially relevant to Rule 9 Requests issued by the Inquiry. Any material identified will be sent for scanning and be uploaded to Relativity. HSF will then review the documents against existing Rule 9 Requests and, where relevant, produce the documents to the Inquiry.</p>		
		<p><u>32 items requested but not yet received from Indices</u></p> <p>The review of the 32 items is complete. Relevant documents have been produced to the Inquiry.</p>	14	<p>Documents produced on 6 January 2023.</p> <p>Production number: PROD109.</p>
		<p><u>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'</u></p> <p>The review of these documents is complete. Relevant documents have been produced to the Inquiry.</p>	413	<p>Documents produced on 30 November 2022.</p> <p>Production numbers: PROD093A – C.</p>
		<p><u>Documents that were reviewed by HSF at Winchester Oasis (that originated from indices) on 15 November 2022</u></p> <p>The review of these documents is complete. Relevant documents have been produced to the Inquiry.</p>	12	<p>Documents produced on 21 December 2022.</p> <p>Production numbers: PROD105A and PROD105B.</p>

**Fourth Interim Disclosure Statement
12 January 2023**

			<p><u>Updated phase 3 (re-indexing) index</u></p> <p>I note for completeness that since the filing of the Third Interim Disclosure Statement, POL requested Oasis to insert some additional items into POL's master phase 3 (re-indexing) index ("Master Re-Indexing Index"). These items had been previously indexed by Oasis directly onto Oasis' document management software, where the rest of POL's inventory sits, but had not been included in the offline Master Re-Indexing Index (which HSF reviews to identify material that is potentially relevant to the Inquiry). I understand that the updating of the Master Index had been inadvertently missed by Oasis.</p> <p>HSF has reviewed the updated index and requested a number of the newly indexed items which are considered to contain material which is potentially relevant to the Inquiry's Terms of Reference to be scanned. Of the items requested for scanning, approximately seven items appeared (based on their high level descriptions) potentially relevant to phase 3 of the Inquiry, 14 items appeared potentially relevant to phase 5 of the Inquiry and two items appeared potentially relevant to phases 4 or 5 of the Inquiry. The majority of the requested items have been scanned and uploaded to Relativity (a total of 1,060 documents).</p> <p>A review of these documents has commenced, and it is anticipated that POL will be in a position to provide any documents responsive to Rule 9 Requests in the week commencing 16 January 2023.</p> <p>I understand that eight items remain to be scanned, and it is anticipated that such scanning will be completed by Friday 13 January 2023.</p> <p>Once the scanning of these items is complete, HSF will review the items against existing Rule 9 Requests and, where relevant, promptly produce the documents to the Inquiry.</p>		
2.	Fujitsu Reports contained on two CDs identified as part of Escalation Process	<i>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</i>	The review of these documents is complete. Relevant documents have been produced to the Inquiry.	294	264 relevant documents (as identified in Annex 2 of HSF's 30 November 2022 letter) and 30 representative sample documents

**Fourth Interim Disclosure Statement
12 January 2023**

		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.			(as identified in Annex 3 of HSF's 30 November 2022 letter). The above documents were initially provided to the Inquiry on 30 November 2022 and were then formally produced on 7 December 2022 under production numbers PROD095A and PROD095B .
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>	<p>There are two related workstreams set out in the 'Review description' column. I address each workstream separately below.</p> <p><u>Hard copy documents identified in the 105 boxes identified at Chesterfield and primarily reviewed at Winchester Oasis on 4 November 2022</u></p> <p>The review of these documents is complete. Relevant documents have been produced to the Inquiry.</p> <p><u>Electronic documents identified in the 105 boxes identified at Chesterfield and primarily reviewed at Winchester Oasis on 4 November 2022</u></p> <p>Paragraph 66 of the Third Interim Disclosure Statement sets out a list of the electronic materials found within the 105 boxes of hard copy material identified at Chesterfield in October and November 2022. I replicate that list below and provide a summary update in respect of each.</p> <p>(A) Five boxes of CDs</p>	146	<p>127 documents produced on 2 December 2022 and 19 documents produced on 14 December 2022.</p> <p>Production numbers: PROD094A and PROD094B (2 December 2022) and PROD099 (14 December 2022).</p>

**Fourth Interim Disclosure Statement
12 January 2023**

			<p>The five boxes contained a number of CDs, the majority of which are encrypted.</p> <p>I understand that, with respect to the non-encrypted CDs, these have been considered by HSF, either by reference to their labels' description or, where the CD's labelling suggested that the content of the CD may be relevant, the content of the CD itself. With one exception (which I understand has been identified as responsive to Rule 9 Request 14), these CDs have been determined not to be responsive to any existing Rule 9 Request. I understand that HSF is liaising with KPMG in order to produce the CD that was considered responsive to the Inquiry.</p> <p>In respect of the encrypted CDs contained within the five boxes, I understand that HSF provided a sample of 40 of the encrypted CDs to KPMG (POL's e-discovery provider) in order that KPMG could apply software in order to attempt to decrypt the content of the CDs so that it could be accessed and reviewed.</p> <p>By 19 December 2022, 30 of the 40 CDs had been processed by KPMG and software had been deployed such that potential passwords had been applied to them with a three-hour time-out (meaning the software automatically moved onto the next CD in the queue if it had not been possible to identify the applicable password in a three-hour period). The software deployed by KPMG did not identify passwords for any of the 30 CDs.</p> <p>As a result, the time-out process was increased to six hours. By 3 January 2022, the software used by KPMG to attempt to decrypt the 40 CDs had been running for two weeks, with a six-hour time out period applied for each CD and over 11 billion passwords checked. I understand that the software deployed by KPMG did not identify passwords for any of the CDs.</p> <p>As a result, POL has instructed KPMG to make a further attempt to decrypt one of these CDs with no time-out. To the extent that exercise is successful, in circumstances where many of the CDs appear from their description to be of a similar nature, it may be that any password identified can also be applied in relation to other encrypted CDs. It is anticipated that this process will run for one month. POL will update the Inquiry once this process is complete. I understand from KPMG that, given the</p>		
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**Fourth Interim Disclosure Statement
12 January 2023**

			<p>sophistication of the encryption used, their view is that it is unlikely that the software will be able to identify the relevant passwords.</p> <p>(B) Three boxes of VHS recordings</p> <p>HSF has completed the review of all the VHS tapes contained within the three boxes and has determined that none are responsive to the Inquiry's Terms of Reference (on the basis that the VHS tapes contained CCTV footage and some training materials regarding the security of sub-postmasters' physical offices).</p> <p>(C) Five boxes of MiniDV tapes and audio cassette tapes</p> <p>As stated in paragraph 67 of the Third Interim Disclosure Statement, the labels attached to the materials contained in these five boxes were reviewed by HSF and none were identified as being responsive to Rule 9 Requests issued by the Inquiry to POL.</p> <p>(D) Two boxes of back-up tapes (previously referred to as cassettes)</p> <p>POL has provided a sample of eight back-up tapes to KPMG for analysis to determine the contents of the same.</p> <p>Given that KPMG does not have the requisite hardware and software to access the backup tapes, KPMG are in the process of instructing a sub-contractor to undertake an exercise to see if it is possible to read the back-up tapes to understand what information may be available. Once instructed, the sub-contractor will be asked to create inventories of all tapes and perform a header scan on all tapes received to determine the Back-up Software used (and to check for the presence of encryption). It is anticipated that this process, once started, will take approximately eight business days but I understand that this timeframe could change once the data types/volume of data for restoration is known.</p> <p>Any indices created during the above process will be reviewed to consider the content of the indexed tapes, where possible. POL will write to the Inquiry in due course with an update on the proposed review of the eight tapes referred to above, and the other remaining tapes previously identified.</p>		
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**Fourth Interim Disclosure Statement
12 January 2023**

4.	Chesterfield documents recently identified and referred to in paragraph 60(D) of this statement	<i>These documents will be sent to Winchester Oasis. As explained in paragraph 60(D), these documents do not, 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.</i>	The items referred to at paragraph 60(D) of the Third Interim Disclosure Statement were indexed. The relevant indices were then reviewed by HSF to assess whether they contained references to material of potential relevance to the Inquiry's Terms of Reference. One item was identified as being potentially relevant to phase 3 of the Inquiry. This item was scanned and, as a result, 761 documents were uploaded to Relativity and reviewed by HSF against existing Rule 9 Requests. I understand that HSF has completed this review and did not identify any relevant documents to be produced to the Inquiry.		
5.	Documents recently identified at POL's Swansea site (see paragraphs 71 – 73)	<i>HSF conducted an initial high-level review of one box of documents identified at the Swansea site as being potentially relevant to the Inquiry.</i> <i>From this review, a small number of documents were sent for scanning so that they could be reviewed further against existing Rule 9 Requests.</i> <i>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.</i>	The review of these documents is complete. Relevant documents have been produced to the Inquiry.	12	Seven documents produced on 30 November 2022 and five documents produced on 22 December 2022. Production numbers: PROD093B (five documents) and PROD093C (two documents) (30 November 2022) and PROD097 (22 December 2022).
6.	Documents recently identified at POL's Birmingham Midway (see paragraphs 74 – 76)	<i>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.</i>	The items referred to at paragraphs 74 – 76 of the Third Interim Disclosure Statement have been indexed. The relevant indices have been reviewed by HSF to identify any items which may contain documents potentially relevant to the Inquiry's Terms of Reference.		

**Fourth Interim Disclosure Statement
12 January 2023**

		<i>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.</i>	<p>The items identified during the above process have been scanned and uploaded to Relativity (a total of 224 documents).</p> <p>HSF is in the process of reviewing these documents against existing Rule 9 Requests and I understand that POL should be in a position to provide any responsive documents to the Inquiry by 13 January 2023. . My understanding is that this is likely to require the production of 16 documents, which are responsive to Rule 9 Request 14.</p> <p>For completeness, I note that the updated index referred to above has also been provided to Peters and Peters. I understand that Peters and Peters requested documentation from the indices that they considered may be relevant to the aspects of the Inquiry's Terms of Reference that they are assisting POL with.</p> <p>Some of the items requested by Peters and Peters remain to be scanned. I understand that it is anticipated that these items will be scanned by Friday 13 January 2023, and I am informed by Peters and Peters that POL should be in a position to produce any relevant material to the Inquiry in the week commencing 16 January 2023.</p>		
7.	Documents recently identified at Belfast Oasis	<i>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.</i>	The review of these documents is complete. The material was reviewed by POL and the material was not considered to be relevant to the Inquiry's Terms of Reference.		
8.	Review of 5 files appraised by the Postal Museum which were not scanned	<i>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</i>	The review of these documents is complete. The one document identified as relevant has been produced to the Inquiry.	1	<p>Document produced on 30 November 2022.</p> <p>Production number: PROD093D.</p>

**Fourth Interim Disclosure Statement
12 January 2023**

		<i>to be in a position to produce that document by 2 December 2022.</i>			
9.	Review of three additional Postal Museum appraised files	<i>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.</i>	As set out at paragraph 53 of the Third Interim Disclosure Statement, this review is complete. No documents were responsive to existing Rule 9 Requests issued by the Inquiry to POL.		
10.	Documents from Finsbury Dials	<i>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.</i>	The review of documents as set out at paragraphs 83 – 86 of the Third Disclosure Statement is complete and no documents were identified as responsive to Rule 9 Requests issued by the Inquiry to POL. I set out in row 16 an updated position in respect of POL's hard copy assurance exercise.		
11.	Horizon files provided by RMG	<i>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.</i> <i>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.</i>	The review of these documents is complete. Relevant documents have been produced to the Inquiry.	391	363 documents produced on 21 December 2022 and 28 documents produced on 6 January 2023. Production numbers: PROD103A – L (21 December 2022) and PROD108A – C (6 January 2023).
12.	Rule 9 Request No. 28 (Question 2)	<i>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).</i> <i>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.</i>	The review of these documents is complete. Relevant documents have been produced to the Inquiry.	9	Documents produced on 14 December 2022. Production number: PROD100 .

**Fourth Interim Disclosure Statement
12 January 2023**

13.	Omnidox Review	<i>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).</i>	The review of these documents (as explained in further detail in our letters dated 14 November 2022, 25 November 2022 and 9 December 2022) is complete. Relevant documents have been produced to the Inquiry.	487	18 documents produced on 14 November 2022, 235 documents produced on 25 November 2022 and 234 documents produced on 9 December 2022. Production numbers: PROD083 and PROD084 (14 November 2022), PROD090A and PROD090C (25 November 2022) and PROD098a – d (9 December 2022).
14.	Identification of hard copy documentation gathered as part of the GLO	<i>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.</i> <i>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</i>	<p>The five boxes of hard-copy materials that Womble Bond Dickinson identified (totalling 243 documents) have been scanned and provided to KPMG for POL's review. However, I understand from Womble Bond Dickinson that there have been technical issues with the transfer of a number of these documents which were only resolved on 10 January 2023. POL understands from the descriptions provided of this material that they may contain documentation which potentially relates to Phases 3, 4, and 5 of the Inquiry. POL is in the process of preparing its review of these documents, which it hopes to complete in the week commencing 16 January 2023, with any documents responsive to Rule 9 Requests issued to POL being produced to the Inquiry.</p> <p>With respect to the VHS cassette, I understand that, upon review, it did not contain any material relevant to the Inquiry (on the basis that that the VHS cassette apparently consisted of footage of postal trucks reversing into depots and damage being caused to depot doors).</p> <p>With respect to the remaining material identified by Womble Bond Dickinson (which amounts to 51 boxes comprising approximately 125 to 175 lever arch folders), I understand that Womble Bond Dickinson is in the process of manually reviewing the documentation to assess whether POL is entitled to it and, if so, scanning this material. I understand that the scanned material will be transferred to POL's Relativity platform for further review by HSF against existing Rule 9 Requests (to the extent that it does not duplicate material already held by POL).</p> <p>Womble Bond Dickinson anticipates that its manual review will be completed by Friday 13 January 2023, with the scanned documents being</p>		

**Fourth Interim Disclosure Statement
12 January 2023**

		responsive documents to the Inquiry as soon as possible.	made available to POL the following week. As at 10 January 2023, 27 of the 51 boxes have been reviewed. I understand that Womble Bond Dickinson considers that the documents within the boxes so far reviewed are documents that POL is not entitled to or are not otherwise to be transferred, for example, because the documents are documents which have been previously provided to POL by Womble Bond Dickinson. Pending completion of Womble Bond Dickinson's manual review, scanning and transfer to POL of the documents, POL will conduct its own review and will provide any documents identified as relevant to existing Rule 9 Requests to the Inquiry as soon as possible.		
Items not referred to within the table at paragraph 80 of the Interim Disclosure Statement					
15.	Review of Tim Parker documents		I understand that certain documents were identified in a locked filing cabinet within Tim Parker's former office. Following an initial review of the documents, one document was identified as being potentially relevant to Rule 9 Request 30 and was produced to the Inquiry on 20 December 2022. The balance of the material that was considered to be potentially relevant to the Inquiry's Terms of Reference has been reviewed. Following this review, 2 documents have been identified as being responsive to existing Rule 9 Requests and have been produced to the Inquiry.	3	One document produced on 20 December 2022 and 2 documents produced on 11 January 2023. Production numbers: PROD104 (20 December 2022) and PROD110A and PROD110B (11 January 2023).
16.	POL's hard copy document audit		As set out in further detail at paragraphs 199 – 123 of the Third Interim Disclosure Statement, POL is in the process of carrying out an assurance exercise in relation to its hard copy document repositories. As set out in that statement, physical site visits are scheduled to occur at POL's Finsbury Dials, Birmingham Midway, Bolton, Chesterfield and Swansea sites, with a paper assurance exercise being conducted on the balance of POL's operated sites.		

**Fourth Interim Disclosure Statement
12 January 2023**

			<p>POL has completed its main physical search of its Finsbury Dials office, with approximately 80 boxes identified as containing material which has been identified as potentially relevant to the Inquiry's Terms of Reference (including documents relevant to later stages of the Inquiry). In addition, during the course of the physical audit, I understand that additional electronic material (such as hard drives and CDs) was identified for further analysis.</p> <p>I understand from the team that undertook the physical search of Finsbury Dials that, based on that initial review, it is anticipated that there is likely to be a degree of duplication of documents that have previously been harvested by POL. Of that hard copy material identified, I understand that POL's initial review has indicated that four items may fall within the scope of phase 2 of the Inquiry and 21 are considered as potentially relevant to phase 3 of the Inquiry (though, based on a high level description of those items prepared by Innovo Law (POL's independent search expert), it is unlikely that a significant proportion of these documents will be responsive to Rule 9 Requests issued to date). Documentation which may be relevant to the other phases of the Inquiry was also identified, and POL is in the process of taking steps to arrange for all potentially relevant documents identified to be scanned and uploaded to Relativity (with documents which appear potentially relevant to earlier phases of the Inquiry being prioritised). Oasis has informed POL that it anticipates that it has capacity to complete this scanning by the end of January 2023.</p> <p>HSF will then (using a combination of search terms and linear review as appropriate) review the documents against existing Rule 9 Requests and POL will produce any responsive documentation to the Inquiry as soon as possible on a rolling basis.</p> <p>Following engagement with relevant trade unions relevant to POL employees, POL will include personal lockers within scope of the search exercise. The team carrying out the search anticipates returning to carry out the review of personal lockers identified at Finsbury Dials during the week commencing 30 January 2023.</p> <p>POL anticipates completing its physical review of its Swansea, Birmingham Midway, Chesterfield and Bolton sites by the end of January 2023. As above, any potentially relevant material identified will be</p>		
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**Fourth Interim Disclosure Statement
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			<p>scanned and uploaded to Relativity. HSF will then (using a combination of search terms and linear review, as appropriate) review the material against existing Rule 9 Requests and POL will produce any responsive documentation to the Inquiry as soon as possible on a rolling basis.</p> <p>For POL's other sites, at which POL is conducting a detailed paper-based assurance exercise, the process will involve asking for information on the documents held at those sites from the relevant site personnel by the end of January 2023. I understand that spot check physical reviews will then be conducted at a sample of these other sites to ensure that the information provided by the paper-based assurance exercise is accurate. Any potentially relevant material identified via the paper-based exercise or ensuing spot checks will be scanned and uploaded to Relativity. HSF will then (using a combination of search terms and linear review, as appropriate) review the material against existing Rule 9 Requests and POL will produce any responsive documentation to the Inquiry as soon as possible and, to the extent necessary, on a rolling basis.</p>		
17.	Additional assurance in relation to documents held by Oasis		<p>It has recently come to my attention that, of the approximately 144,000 items (being boxes or folders or documents or other media) held by Oasis, 623 items have, since 2013, been checked out (i.e. removed) from Oasis' repositories but have not yet been checked back in (i.e. returned). My understanding is that records indicate that 340 of these items were originally sent to either HSF or Peters and Peters, who have previously requested the items from POL in respect of the work they are engaged with for POL. POL is taking steps to attempt to retrieve items which have been checked out should it be necessary to consider them for relevance to matters being dealt with by the Inquiry. Of the 623 items thought to be currently held outside Oasis' sites, I understand that, based on a review of the high-level descriptions of these items, four items which it is understood are not held by HSF or Peters and Peters may contain documents which are potentially responsive to the Rule 9 Requests issued by the Inquiry. POL is considering its own locations and liaising with its external advisors in order to locate these items. To the extent that items are recovered which it is considered may contain documents responsive to Rule 9 Requests received from the Inquiry, such documents will be reviewed and, if relevant, produced to the Inquiry.</p> <p>In addition, I note that a small number of entries on the Oasis Indices are recorded as 'pending add'. I understand that the categorisation of 'pending</p>		

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12 January 2023***

			add' is given to items, based on their barcode, which are to be collected and stored. The 'pending add' categorisation is then updated once the item is in fact collected for storage. As these items still have the categorisation of 'pending add' I understand that this could reflect the fact that certain items that were scheduled to be added to the Oasis Indices were never actually added to storage or, the items were added to storage but the barcodes for the items were recorded incorrectly, meaning that the 'pending add' categorisation was not immediately updated. POL is taking steps to investigate the whereabouts of these documents.		
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Statement of truth

I believe the content of this statement to be true.

GRO

Signed: _____

Dated: 12/01/2023