

Witness Name: Lisa ALLEN

Statement No: WITN08920100

Dated: 27 October 2023

## POST OFFICE HORIZON IT INQUIRY

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### FIRST WITNESS STATEMENT OF LISA ALLEN

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I, LISA ALLEN, will say as follows;

1. This witness statement is made to assist the Post Office Horizon IT Inquiry with the matters set out in the Rule 9 Request dated 2 October 2023 (in ***bold and italics*** below).
2. I have been assisted by Priyesh Patel of DAC Beachcroft LLP in the preparation and drafting of my statement.

### Background

***Please set out a summary of your career and qualifications. Please include the date on which you first began at the Post Office, the positions you held (including but not limited to National Investigation Manager and Senior Security Manager), the dates for which you held them, a description of what they entailed and the date you left the Post Office.***

3. I preface my answer to this question by saying I have never been a Senior Security Manager or a National Investigation Manager as provided for in the question.
4. I joined PO Ltd on 26/08/1986 as a Postal Officer working within the Crown Office Network. This role involved working on the counter and serving customers. I was responsible for the cash and stock assigned to me and for the summarising of my work both daily and weekly and the balance of that stock unit. At this time balancing was on a weekly basis and was completed manually by producing a balance sheet of summarised daily and weekly transactions.
5. In August 1992 I transferred to a Post Office where a computerised system had already been implemented. This was one of two systems I used whilst a counter clerk, but I cannot recall which way round they were installed. The two systems I recall were ALPS (This stood for All London Post Offices I believe) and Ecco. I do not recall whether I received class-room based training or if I received onsite training by a member of staff.
6. Around 1995 I was promoted to Assistant Branch Manager which gave me additional responsibilities for the day to day running of the Post Office. With the exception of a secondment of performing an Admin Role supporting Retail Line Managers (now known as Contract Managers) for a number of months, I remained within the Crown Office Network until joining the Security Team around July 2000.
7. Around July 2000 I was promoted to an Investigation Manager. This role involved investigating criminal offences against the business and its assets. This role did evolve at one point into a 'multi skilled' role whereby Physical Security work was also undertaken. This could be attending offices after a burglary or robbery, ensuring the equipment on hand is fit for purpose etc. But this did return to an Investigative Role only at some point and was still so when I left the business in April 2012.

8. The only absence I can recall between joining Security in 2000 and leaving in 2012 was when I was on maternity leave for one year between March 2004 - March 2005.
9. In April 2012 I transferred to the Royal Mail Investigation Team where I remain. I am currently within the Economic Crime Team investigating offences against the business, predominantly external crime.

***It is understood that you joined the Security Team in 2000 as a Security Manager. In relation to your position as Security Manager (and any other roles you held in the Security Team) please set out in detail:***

***i) How you became a Security Manager;***

10. I submitted an application and was invited to attend a one day assessment. This assessment involved role playing, report writing and interviews with personnel.

***ii) Your training and relevant experience and expertise;***

11. The initial recruitment process was an application for an Investigator Role within the Royal Mail business. As at the time RM, PO Ltd and Parcel Force Worldwide (PFWW) were all part of the same business, you were allocated a role suitable for your experience. As I had PO counters experience and knowledge, I was given a role within the PO Ltd Investigation Team.
12. I attended a 3 week residential training course at the RM training centre at Wolverton Mill, Milton Keynes. This was a mixed course of both PO Ltd and Royal Mail Investigators. This training was delivered by members of the RM training team I recall as; Michael MATTHEWS, Edward FREWER and Andrew BROWN. In preparation for this course, I was provided with a number of workbooks to complete prior to attending the course. At the start of the course we had to sit an exam and there was a pass mark for me to be able to proceed with the training. I do not recall the % but I did pass the test. A further test was

taken at the end of the course confirming my current knowledge and understanding and to ensure there was improvement on the initial test where needed. Again I passed this test.

13. This training included but is not exhaustive to the commencement of an investigation, approaching of suspects, interviewing, searches, statement taking, the completion of RM Forms, Police and Criminal Evidence Act 1984 (PACE), definition of offences, report writing and notebook entries.

14. I also attended a Court Workshop in March 2002 to understand the legal proceedings and guidance on giving evidence at court. I also attended Human Rights Training.

15. I completed the National Policing Improvement Agency Financial Investigation Course in March 2011.

16. I am sure there was further training provided but I cannot recall at this time the details.

**iii) What you understood the role to involve;**

17. I believed the role was to investigate criminal offences committed against the business by both Crown Office staff, Sub postmasters and their employees. This role may also involve working in partnership with other agencies such as the DWP or the Police in the prevention and detection of crime.

**iv) Who you reported to / your line management;**

18. The reporting line in order as I recall was as follows;

- 2000 Lester Chine for a number of years
- Paul Dawkins
- Paul Whittaker
- Graham Brander (temporarily promoted)

- Jason Collins until I transferred to RM in 2012.

v) **Your views on the competence and professionalism of your colleagues and managers.**

19. I always found my colleagues and managers to be competent and professional. I would not hesitate to approach them for guidance and advice when needed.

**Insofar as not already addressed by the questions above, what role did you consider you had in relation to each of the following (and when):**

i) **Disciplinary matters;**

20. My role as an Investigator was to provide a report to the discipline/contracts manager to assist them with deciding any course of action that may be required following an enquiry. This report detailed only the facts of the case and not opinion. The discipline Manager for Crown office member of staff would be the Branch Manager, and for Sub postmasters the Contracts Manager.

ii) **Interviewing those accused of criminal offence;**

21. Part of my role was interviewing people under caution who were suspected of having committed a criminal offence against PO Ltd. I would also be called upon to assist my colleagues as a second officer when required. This role was to simply assist the first officer during the interview which may include ensuring the correct processes were followed, the caution given, and completing any necessary forms.

iii) **Disclosure in criminal or civil proceedings;**

22. In all cases where I was Officer in the Case (OIC), I was also the disclosure officer. My role as the disclosure officer was to retain, record and reveal any material that may assist the defence or undermine the prosecution case. I was

responsible for completing the disclosure schedules and for conducting all reasonable lines of enquiries.

**iv) *Litigation case strategy;***

23. I had no input into the Litigation Case Strategy. My role was to submit case-papers to RM Legal Services for advice as to whether a case was suitable for prosecution. Papers were returned with advice from an assigned lawyer on further evidence/statements required if a prosecution was authorised. The Designated Authorising Manager would then confirm if authority was given to proceed to prosecution. Upon resubmission of outstanding enquiries summons were raised and case assigned to counsel. Advice received from Counsel on any further enquiries to be made.

**v) *Liaising with other Post Office departments in respect of the progress of cases (please identify the relevant departments).***

24. During the course of my duties I liaised with:

- i) Product and Branch Accounting – Error Notices for all transactions
- ii) Bank of Ireland Team – Post Office Card Account Transactions
- iii) NBSC – Call logs
- iv) HSH – Call logs
- v) Contracts Manager – Sub postmasters and their staff
- vi) Branch Development Managers – PO Ltd staff
- vii) Financial Investigation Unit – Financial Enquiries

**The Security team's role in relation to criminal investigations and prosecutions**

***Please consider the following documents, which you may find to be of assistance when answering the questions set out below under this heading:***

- i) **Casework Management Policy (version 1.0, March 2000) ([POL00104747]) and (version 4.0, October 2002) ([POL00104777]);**
- ii) **Rules and Standards Policy (version 2.0, October 2000) ([POL00104754]);**
- iii) **"Investigation Procedures Policy (version 2.0, January 2001) ([POL00030687]);**
- iv) **Disclosure Of Unused Material, Criminal Procedures and Investigations Act 1996 Codes of Practice Policy (version 1.0, May 2001) ([POL00104762]);**
- v) **"Royal Mail Group Ltd Criminal Investigation and Prosecution Policy" (1 December 2007) ([POL00030578], which appears to be substantially the same as the policy of the same date with a variation on the title at [POL00104812]) (see, in particular, section 3);**
- vi) **"Royal Mail Group Security - Procedures & Standards - Standards of Behaviour and Complaints Procedure" (version 2, October 2007) ([POL00104806]);**
- vii) **"Royal Mail Group Crime and Investigation Policy" (version 1.1, October 2009) ([POL00031003]);**
- viii) **"Post Office Ltd - Security Policy - Fraud Investigation and Prosecution Policy" (version 2, 4 April 2010) ([POL00030580]);**
- ix) **"Post Office Ltd Financial Investigation Policy" (4 May 2010) ([POL00030579]);**
- x) **"Royal Mail Group Security - Procedures & Standards - The Proceeds of Crime Act 2002 & Financial Investigations" (version 1, September 2010) ([POL00026573]);**
- xi) **"Royal Mail Group Security - Procedures & Standards - Initiating Investigations" (September 2010) ([POL00104857]);**
- xii) **"Royal Mail Group Ltd Criminal Investigation and Prosecution Policy" (version 1.1, November 2010) ([POL00031008]);**
- xiii) **Post Office Ltd Financial Investigation Policy (version 2, February 2011) ([POL00104853]);**

- xiv) *Post Office Ltd Anti-Fraud Policy (February 2011) ([POL00104855]);*
- xv) *"Royal Mail Group Policy Crime and Investigation S2" (version 3.0, April 2011) ([POL00030786]);*
- xvi) *"Post Office Ltd PNC Security Operating Procedures" (August 2012) ([POL00105229]);*
- xvii) *"Post Office Limited: Internal Protocol for Criminal Investigation and Enforcement (with flowchart)", (October 2012) ([POL00104929]);*
- xviii) *"Undated Appendix 1 - POL Criminal Investigations and Enforcement Procedure (flowchart)", (October 2012) ([POL00105226]);*
- xix) *The undated document entitled "POL – Enforcement & Prosecution Policy" ([POL00104968]);*
- xx) *"Post Office Limited: Criminal Enforcement and Prosecution Policy" (undated) ([POL00030602]);*
- xxi) *"Conduct of Criminal Investigations Policy" (version 0.2, 29 August 2013) ([POL00031005]);*
- xxii) *"Conduct of Criminal Investigations Policy" (version 3, 10 February 2014) ([POL00027863]);*
- xxiii) *"Conduct of Criminal Investigations Policy" (September 2018) ([POL00030902]).*

25. I have considered the aforementioned documents and wish to stress that the following documents were all created after I left PO Ltd:

- i) *"Post Office Ltd PNC Security Operating Procedures" (August 2012) ([POL00105229]);*
- ii) *"Post Office Limited: Internal Protocol for Criminal Investigation and Enforcement (with flowchart)", (October 2012) ([POL00104929]);*
- iii) *"Undated Appendix 1 - POL Criminal Investigations and Enforcement Procedure (flowchart)", (October 2012) ([POL00105226]);*
- iv) *"Conduct of Criminal Investigations Policy" (version 0.2, 29 August 2013) ([POL00031005]);*

- v) "Conduct of Criminal Investigations Policy" (version 3, 10 February 2014) ([POL00027863]);
- vi) "Conduct of Criminal Investigations Policy" (September 2018) ([POL00030902]).

***Please explain the organisational structure of the Security team including the different divisions within the Security team and their respective functions. Please outline, to the best of your knowledge, any significant changes to the structure of the Security team during your time in relevant roles within it.***

26. To the best of my recollection, in July 2000 Tony Marsh was the Head of PO Ltd Security. I can recall Tony Utting becoming temporary Head of Security for a time (dates unknown) before John Scott took on the role on a permanent basis. He was still in post when I left in April 2012.

27. There were five strands within the Security Team when I left in 2012. All strands were headed up by a Senior Security Manager, reporting directly to John Scott. I recall the 5 strands led by Senior Security Managers as follows:

- **Physical Security – John Bigley.** This team managed PO Ltd premises, assets, equipment, burglaries and robberies.
- **Information Security – Richard Barber.** This team managed IT issues relating to systems in place at PO Ltd and compliance. eg Ensuring the systems were Payment Card Industry Compliant
- **Commercial Security - Sally Smith.** This team liaised with Clients such as Driver and Vehicle Licensing Agency (DVLA), Girobank, Department for Work and Pensions (DWP) and was the go between for any issues with products, transactions etc
- **Fraud Risk – Andrew Hayward.** This team were responsible for identifying trends and implementing fraud risk programmes.

- **Security Operations – Dave Pardoe.** This team were responsible for investigating criminal offences committed against the business.
28. When I joined the Security Team around July 2000, I believe there were 7 teams within this strand which I think was known as the Investigation Team. I believe the name changed to the Security Operations upon John Scott heading up the Security Team. Each team consisted of around 6 investigators and one team leader. Between 2000 and 2012 when I left the business, there had been numerous head count reduction exercises. This reduced the teams over the years eventually to 3 teams with 3 team leaders and around 18 investigators.
29. Also within the Security Operations were the Financial Investigation Team. They were initially made up of two investigators Michael Matthews and Ged Harbinson. Following Michael Matthews and then Ged Harbinson transferring to RM, Graham Ward, Dave Posnett and Paul Southin took up roles within this team at various times.
30. Also within this strand was the Casework Team, originally based in London. I can recall Brian Sharkey, Graham Ward, Dave Posnett and Jason Collins working within this unit at various times, until it was relocated to Manchester and Jane Owens became the Manager (date unknown).
31. The London Casework Team managed the case-papers between the Investigator and the Legal Services. They were also responsible for amongst other things for compliance checks on the files, requesting Fujitsu data, dealing with Post Office Card Account (POCA) enquiries and raising cases. This may be as a result of an audit shortage or if information had been received where suspected criminal offences had taken place.
32. I cannot recall the responsibilities of Jane Owen once the Casework Team transferred other than being the Fujitsu liaison point and Post Office Card Account enquiries. I do not think she had the relevant experience to compliance check the case-papers.

***Please explain your role in the development and / or management of any of the policies listed above.***

33. I was not involved in the development and / or management of any policies.

***What legislation, policies and / or guidance governed the conduct of investigations conducted by the Security team during the period you worked within it and how did this change over the period you held relevant roles within it?***

34. We adhered to PACE 1984, Criminal Procedure and Investigations Act 1996 (CPIA 1996), Human Rights Act 2000, Proceeds of Crime Act 2002 (POCA 2002), Data Protection Act 1998.

35. There were also a number of RMG policies within our databases that we adhered to.

***Please consider [POL00123309] and the attachments at [POL00123310], [POL00123311] and [POL00123312]. Please describe the impact of the separation of the Post Office from Royal Mail (if any) in relation to the way investigations were conducted.***

36. I have considered the following documents [POL00123309], [POL00123310], [POL00123311] and [POL00123312]. I left PO Ltd in April 2012 just as the separation of Royal Mail and PO Ltd started, I have no comment to make on the way in which PO Ltd conducted their investigations from this point onwards as I was no longer employed by PO Ltd.

***What was the process for dealing with complaints about the conduct of an investigation by the Security team?***

37. Having considered this question I do not recall the process. I have considered [POL00104806] and I do not recall this policy.

***What, if any, supervision was there over criminal investigations conducted by Security Managers? Please describe the nature of any supervision.***

38. When I was new to the role I was guided by my Line Manager, Lester Chine and my peers. All cases were supervised by the Line Manager before submission. On completion of an investigation and for advice from Legal Services, case-papers were submitted to The Casework Manager who would complete compliance checks. The papers were then submitted to Legal Services for advice. The paralegal would ensure all matters outstanding were completed.

***How did Post Office policy and practice regarding investigation and prosecution of Crown Office employees differ from the policy and practice regarding investigation and prosecution of SPMs, their managers and assistants (if at all)? Did this change over the period of time you held relevant roles within the Security team?***

39. For losses where suspected criminal conduct was identified my recollection was that both Crown Office staff, Sub postmasters and their assistants were treated the same.

#### **Audit and investigation**

***Please consider the document "Condensed Guide for Audit Attendance" (version 2, October 2008) [POL00104821]. In what circumstances would an investigator attend an audit of a branch and what was an investigator's role on attendance?***

40. After an audit shortage had been reported to the Security Casework Team it would be assessed as to whether a case should be raised. If a case was raised then it was allocated to the Team Leader for that area. The Team Leader would then assess what response was required and if necessary allocate it to an investigator. An Investigator would attend the office and try to establish the facts

and identify if a suspected criminal offence had or had not taken place. They would identify persons of interest to the investigation. If a suspect was identified they would be cautioned and depending on the circumstances request voluntary searches and attendance at interview.

***Where a shortfall was identified following an audit of a Post Office branch:***

***i) What and who determined whether an investigation into potential criminality was conducted by the Security team or the case was taken forwards as a debt recovery matter by the Financial Services Centre and / or the relevant legal team? Did this change during the period you worked within the Security team?***

41. I am unaware of who determined whether a case was put forward as a criminal investigation or if it was dealt with by conduct by the Contracts Manager at the outset. However, I am aware there were 'trigger points' which I know one of which related to the value of the loss. If the triggers were met then I believe that would instigate a criminal investigation.

***ii) Where the branch was run by a SPM, did the SPM's local contract manager have any input into this decision-making process? Did this change during the period you worked within the Security team?***

42. The contracts investigation would run independent of the investigation case. However, if the Contracts Manager decided that they would accept a repayment of a loss and not suspend the Subpostmaster, then a criminal investigation would not ensue.

***iii) What were the triggers / criteria for raising a fraud case following the identification of a shortfall /discrepancy in a branch? Were the triggers / criteria for raising a theft or false accounting case different and if so what were they? Did these change during the period you worked within the Security team?***

43. I am aware there were 'trigger points' but I do not recall what the criteria was during my time with PO Ltd.

**The process followed by Security team investigators when conducting a criminal investigation following the identification of a shortfall at an audit**

***Once a decision had been made to conduct a criminal investigation, what process did Security team investigators follow in conducting their initial investigation? You may wish to consider the documents listed at paragraph 4 above in addressing this question.***

44. Once a case has been raised and assigned to an Investigator the stakeholder (Contracts Manager) would be informed that the investigation had been assigned to them for further enquiries to be made. Contact made with the informant to establish the facts and consideration given to obtaining a witness statement. Intelligence gathered on the subject and a risk assessment performed should searches be required. Evidence collected to support/undermine the investigation by attending the office and retaining documentation. Consideration given to advising the Financial Investigators of the loss. Contact made with the subject either in person or on the phone seeking an explanation. Arrange interview under caution if suspected criminal offence.

**Decisions about prosecution and criminal enforcement proceedings**

***Following an initial investigation, who decided whether a SPM, their manager(s) and / or assistant(s) or a Crown Office employee should be prosecuted by the Post Office and what considerations determined whether a prosecution was brought? To the extent that this changed during the time you held relevant roles within the Security team, please describe any such changes***

45. Case-papers were submitted to Legal Services for advice as to whether a case was suitable for a prosecution. The Lawyer allocated the case would decide if there was sufficient evidence for a realistic prospect of conviction. If Legal Services recommended a prosecution then the case-papers were sent to the Designated Prosecution Authority (DPA) to decide if a prosecution proceeded. On authority from the DPA the legal process would commence.

***Where a branch was run by a SPM, did the SPM's local contract manager have any input into this decision-making process? Did this change during the period you worked within the Security team?***

46. I do not recall the Contracts Manager having any input into the decision. However, if the Contracts Manager decided to reinstate the Sub postmaster then a prosecution would not be deemed appropriate and would not proceed.

***What test was applied by those making prosecution and charging decisions? In particular, what factors were considered at the evidential and the public interest stage?***

47. This is not a decision I undertook and I was not familiar with the test applied for those making the prosecution and charging decisions.

***What advice, legal or otherwise, was provided to those making decisions about whether to prosecute and what charges to bring?***

48. The case-papers were returned to the Designated Prosecution Authority (DPA) from Legal Services with advice as to whether there was sufficient evidence to prosecute and charges if applicable. It was for the DPA to read the papers and decide for themselves whether the prosecution should proceed or not.

***In what circumstances were steps to restrain a suspect's assets by criminal enforcement methods such as confiscation proceedings considered?***

49. Where an audit shortage was identified and repayment was not made, depending on the amount of loss, a financial investigator would be assigned to the case. The investigator would report any identified assets and the Financial Investigator would consider a restraining order.

***Who decided whether criminal enforcement proceedings should be pursued and what factors did they consider when making decisions around this?***

50. I cannot recall if this was the DPA, Head of Security or if the FI made the decision.

**Training, instructions and guidance to investigators within the Security team**

***What instructions, guidance and / or training were given to investigators within the Security team about the following topics and how was this provided:***

***i) interviewing a SPM / SPM's assistant / Crown Office employee who was suspected of a criminal offence;***

51. The initial training in 2000 included conducting interviews as a 1<sup>st</sup> officer and as a 2<sup>nd</sup> officer supporting the OIC. I can recall partially attending a further interview course at Coton House, Rugby (cannot recall the dates but left early due to illness).

52. A document of the most common offences and the points to prove were on the Intranet that detailed the Act and the points to prove to ensure all points were covered.

***ii) taking witness statements in the course of an investigation;***

53. This was covered within the initial training in 2000. R-v- Turnbull ADVOKATE was covered in this topic.

***iii) conducting searches in the course of an investigation;***

54. During the course in 2000, training on searches was given and role playing done. This was followed up by attending the Thames Valley Police (TVP) training centre where searches were conducted within their training houses.

***iv) the duty on an investigator to investigate a case fully;***

55. An investigator should take steps to make all reasonable lines of enquiries under CPIA that points to or away from the suspect.

***v) obtaining evidence in the course of an investigation;***

56. Evidence should be securely retained and exhibited.

***vi) whether and in what circumstances evidence should be sought from third parties who might hold relevant evidence and, in particular, Fujitsu, where shortfalls were identified in branch;***

57. Evidence held by a third party should be recorded and the third party asked not to destroy any data.

***vii) an investigator's disclosure obligations;***

58. It was investigators responsibility to record, retain and reveal any material to Legal Services which may undermine the prosecution and or assist the defence. This was an ongoing responsibility.

***viii) drafting investigation reports to enable a decision to be made about the future conduct of a case.***

59. There were templates available to ensure that the information required to be able make an informed decision was captured in the report.

**Please consider the following documents:**

- i) The Casework Management document at [POL00104747] (version 1.0, March 2000) and [POL00104777] (version 4.0, October 2002);**
- ii) David Posnett's email to you and others dated 23 May 2011 at [POL00118096] and the documents contained within the attached compliance zip file at [POL00118108], [POL00118109], [POL00118101], [POL00118102], [POL00118103], [POL00118104], [POL00118105], [POL00118106] and [POL00118107].**

**In relation to the documents set out above please include in your account an explanation of the following:**

- i) Whether you were provided with either the 2000 or 2002 version of the Casework Management document when you held relevant roles within the Security Team;**

60. I cannot recall whether I was provided with either of these documents.

- ii) What you understood by the instructions / guidance given in second, third and fourth bullet points on page 2 of the 2000 version and the first, second and third bullet points on page 2 of the 2002 version (in particular whether you understood this to be relevant to Post Office' disclosure obligations in relation to information about Horizon bugs, errors and defects);**

61. As I am unable to recall these documents I cannot comment on my understanding of them at that time.

- iii) The circumstances in which investigations became subject to compliance checks, their purpose, the process for those checks being conducted and who conducted them;**

62. The Casework Team based in Croydon initially completed the compliance checks on the case-papers. I do not recall if this was at the time of my entry into the Security Team or if this was introduced after my joining but this team I recall was headed up by Brian Sharkey. I cannot recall how these checks were performed and what criteria they were marked against.

63. There was a change of personnel within the Casework Team over the years with Jason Collins, Graham Ward, Dave Posnett, and Michael Mathews performing this role at various times. I can recall a check list being provided to the investigators so that we could compliance check our own papers prior to submission. The aim being obtaining 100% compliance and driving up the standards.

***iv) What you understood the status of the suite of compliance documents attached to the email from David Posnett dated 23 May 2011 to be at the time they were circulated;***

64. Looking at the documents, it maybe that these were the current forms to be used from that time. These documents were provided to assist the investigator in achieving compliance as these were the documents from which your compliance check would be assessed and scored. This email appears to insinuate that compliance checks will be starting as if they have been previously stopped but I do not recall whether that is the case or not.

***v) What the purpose of the suite of compliance documents was at the times when they were in effect;***

65. I do not recall being sent these documents but having looked at them, I believe they were the current versions used at that time. These may have been circulated due to new members of staff joining the team.

***vi) Any role you had in relation to their development, management and any amendment;***

66. I did not have any involvement in the development, management or amendments of the documents.

*vii) Your understanding of paragraph 2.15 (starting on p. 10) of the document entitled "Guide to the Preparation and Layout of Investigation Red Label Case Files – Offender reports & Discipline reports" ([POL00118101], attached to David Posnett's email of 23 May 2011) and how this related to the Offender Report template (at [POL00118102], attached to David Posnett's email of 23 May 2011), as well as its relevance to the Post Office's disclosure obligations (and in particular as they related to information about Horizon bugs, errors and defects);*

67. I do not recollect these documents.

*viii) Who drafted the document entitled "Identification Codes" (at [POL00118104], attached to David Posnett's email of 23 May 2011);*

68. I have looked at document [POL00118104] and I do not know the author of this document.

*ix) Your view on the appropriateness of the identification codes described in the "Identification Codes" document;*

69. My view is that document [POL00118104] is offensive and inappropriate.

*x) Your understanding of why Security Team investigators were instructed to assign identification codes to suspected offenders.*

70. I believe the purpose of this was to be able to update the PNC upon conviction.

*Please consider the email from Dave Pardoe, dated 30 August 2011 at [POL00121772] and the attachment at [POL00121773].*

*i) What was Project Golden? Please describe your involvement in this project.*

71. I do not recall Project golden. [POL00121773] Not supplied.

*ii) What did you understand to be the underlying issue which this training sought to address?*

*iii) Please describe any further involvement you had in respect of this issue.*

72. [POL00121773] Not supplied.

**Analysing Horizon data, requesting ARQ data from Fujitsu and relationship with Fujitsu**

*When you held relevant roles within the Security team, what analysis (if any) was done by Security team investigators of Horizon data when a SPM / SPM's manager(s) or assistant(s) / Crown Office employee(s) attributed a shortfall to problems with Horizon?*

73. I cannot recall.

*Where a shortfall had been identified and the relevant SPM / SPM's manager(s) or assistant(s) / Crown Office employee(s) attributed the shortfall to problems with Horizon, was ARQ data requested from Fujitsu as a matter of course? If not, why not?*

74. I cannot recall if it was requested as a matter of course.

*Where ARQ data was obtained from Fujitsu, in circumstances where a shortfall had been identified and the relevant SPM was attributing the shortfall to problems with Horizon, was this data provided to the SPM in question as a matter of course? If not, why not?*

75. ARQ data obtained was not provided as a matter of course but was retained for providing to the defence upon request.

***Please consider [FUJ00153133]. Were you aware of the issue of duplication of transactions records in ARQ returns? If so, please provide details of how you became aware of this issue and your understanding of its implications, as well as your understanding of how the issue was dealt with.***

76. I have read [FUJ00153133] and I can see that I have been referred to an email regarding duplicate transactions. I can state that I do not recall an issue with duplicate transactions within ARQ data, nor do I recall if I received a statement from Fujitsu regarding this matter in the case of HOSI (Porters Avenue).

***Please consider [FUJ00156491], [FUJ00156309], [FUJ00156151], [FUJ00156140], [FUJ00156067], [FUJ00155987]. Please describe the circumstances in which you would have contact with Fujitsu when you worked within the Security team and the relevant contacts at Fujitsu (this should include, but not be limited to contact with Gareth Jenkins and Penny Thomas).***

77. I have read and considered the following documents [FUJ00156491], [FUJ00156309], [FUJ00156151], [FUJ00156140], [FUJ00156067], [FUJ00155987].

78. Our usual practice was all requests for Fujitsu data or statements, were submitted through our Casework Team who managed the relationship with Fujitsu. They were responsible for requesting the ARQ data as it was required as they managed the quota of requests. They would also normally request any statements required if needed for any prosecution.

79. Although I do not recall any specific communications, I can recall I have had reason to speak with and or email directly Penny Thomas, Gareth Jenkins and Andy Dunks in relation to ongoing prosecutions.

***What did you understand the role of Gareth Jenkins to be in relation to criminal prosecutions he was involved in (see further below in relation to individual criminal case studies)?***

80. I understood Gareth Jenkins to represent Fujitsu as an expert witness. I understood him to hold a senior role within Fujitsu and be able to answer technical questions relating to the workings of the system.

***Please consider [FUJ00153099]. To what extent did you consider Gareth Jenkins to be acting as an expert witness? Did you understand the rules governing independent expert evidence? Who advised or assisted you in this regard?***

81. I have considered [FUJ00153099] I believed that Gareth Jenkins was an expert witness for Fujitsu which I understood to be someone who was extremely knowledgeable within his field of expertise. In this case it was the workings of the Horizon system. I was not given any guidance on the rules governing 'independent expert evidence'.

#### **Relationship with others**

***Please describe your involvement with Cartwright King Solicitors, including the level of interaction that you typically had in a case (and in which roles), your main contacts and any other information that you consider to be of relevance to the Inquiry.***

82. I can only recall one case by name in which I believe Cartwright King Solicitors were involved. This was Enfield CFPO – Naveed & Saeed ANWAR. I do not recall the level of involvement they had in this case other than the case went to trial and Naveed ANWAR pleaded guilty on day 1 or 2 and the case was dropped against Saeed ANWAR. However, by the time the case had gone to trial I had transferred to RM and the case was managed by Graham Ward.

83. There are possibly other cases that were passed to Cartwright Kings Solicitors but I do not recall. I cannot remember any of the names of Solicitors at this company.

### **Involvement in the Criminal Case Studies**

#### ***Prosecution of Suzanne Palmer***

***The Inquiry is seeking a full and detailed account of the investigation and prosecution of Suzanne Palmer. Please set out your recollection of this case, including but not limited to addressing the questions below.***

***Please consider the following documents:***

- i) The audit report dated 3 February 2006 at [POL00068283];***
- ii) The Record of Tape Recorded Interview of Suzanne Palmer on 6 February 2006 at [POL00053009];***
- iii) iii) The Investigation Report by Lisa Allen dated 20 February 2006 at [POL00053007];***
- iv) The Notification of Proceedings to Police form in this case at [POL00053005] and [POL00053006];***
- v) Jarnail Singh's memo to the Investigation Team dated 10 March 2006 at [POL00052990];***
- vi) The Schedule of Charges at [POL00053011];***
- vii) Jarnail Singh's memo from Lisa Allen to you dated 6 April 2006 at [POL00052987];***
- viii) Jarnail Singh's memo to the Investigation Team dated 15 May 2006 at [POL00052994];***

- ix) *Jarnail Singh's memo to the Investigation Team dated 23 June 2006 at [POL00053001];*
- x) *Jarnail Singh's memo to the Investigation Team dated 11 July 2006 at [POL00052991];*
- xi) *Jarnail Singh's memo to the Investigation Team dated 26 July 2006 at [POL00053003] and the enclosed Advice from Counsel dated 25 July 2006 at [POL00053008];*
- xii) *The Indictment at [POL00052986];*
- xiii) *The memo from Phil Taylor to the Investigation Team, dated 23 August 2006 at [POL00053002];*
- xiv) *The memo from Jennifer Andrews to the Investigations Team dated 14 September 2006 at [POL00052993];*
- xv) *The memo from Jennifer Andrews to the Investigations Team dated 20 September 2006 at [POL00052998].*

***How and when did you first become involved in the Suzanne Palmer case?***

84. I have considered all of the above documents above.

85. As noted in the investigation report [POL00053007], I became involved in the Suzanne Palmer case on 03/02/2006. This was most likely the result of the audit team reporting a discrepancy to either the Casework Team or my then Line Manager Lester Chine. I would have been assigned the investigation by Lester Chine and requested to attend the office the same day.

***Please describe any involvement you had in the audit of the branch on 3 February 2006.***

86. I did not have any involvement with the audit nor did I request the audit was undertaken:

***Please describe the circumstances in which Mrs Palmer was suspended.***

87. I do not know the circumstances in which Mrs Palmer was suspended. It was most likely as a result of the outcome of the audit that was relayed to the Contracts Manager by the Auditor. It is then a decision for the Contracts Manager as to whether they suspend or not.

***Whose decision was it to suspend Mrs Palmer?***

88. It was the decision of the Contracts Manager Alan Lusher.

***Please describe your involvement in the initial investigation.***

89. Although I do not recall the conversation, it is probable that I or my Line Manager spoke with one of the auditors prior to attending the office. They would have given the audit outcome and any explanation for the loss that they had been provided with by Mrs Palmer. I would have then attended the Post Office and spoken directly with her.

***Were you aware of any allegations made by Suzanne Palmer relating to the reliability of the Horizon IT system? If so, what did you think the significance of this was?***

90. I do not recall specifically any issues relating to the reliability of the Horizon system. I have considered doc [POL00053009] and Mrs Palmer does comment within the interview (tape 1) on the system going down and causing a loss in which she repaid and some other issues where the system is offline. I do not recall whether this issue was recorded on any Helpdesk logs and I am unable to recall if any further enquiries were made.

***Please consider page 6 of the offender report [POL00053007]. What was the basis of your observation that Mrs Palmer "has not received help when she requested it and appears to have muddled through". What impact, if any, did this have on your view of the case?***

91. On reading document [POL00053007] on page 6 I believe the comments refer to a summary of Mrs Palmers interview that due to lack of training she has managed the best she can. I have described it as 'muddling through'.

***Please describe any discussions you had with Jarnail Singh before he provided the advice set out in the memo of 10 March 2006?***

92. I do not recall any discussions with Jarnail Singh prior to the advice set out in the memo of 10<sup>th</sup> March 2006 [POL00052990].

***Please describe any steps you took after receiving that memo.***

93. After receiving doc [POL00052990] and the DPA, I would have obtained the requested statements where possible and considered any further statements that were relevant.

***Who made the charging decision in the case? What were the final charges laid?***

94. My observation from [POL00053007] was that Jarnail Singh would have prepared the charges and Tony Utting would have authorised the prosecution.

***Who authorised the prosecution of Suzanne Palmer?***

95. [POL 00053007] shows the DPA as Tony Utting in this case.

***Was any Horizon data (and in particular ARQ logs) requested from Fujitsu in this case?***

96. I do not recall.

***Please consider the following documents:***

***(i) The memo from Jennifer Andrews to the Investigations Team dated 11 October 2006 at [POL00052992];***

***ii) The memo from Jennifer Andrews to the Investigations Team dated 8 November 2006 at [POL00052988];***

***iii) The memo from Jennifer Andrews to the Investigations Team dated 9 November 2006 at [POL00052989];***

***iv) The memo from Jennifer Andrews to the Investigations Team dated 17 January 2007 at [POL00052995];***

***v) Jarnail Singh's memo to the Investigation Team dated 19 January 2007 at [POL00052997];***

***vi) Jarnail Singh's memo to the Investigation Team dated 23 January 2007 at [POL00053000].***

***Please describe the nature of any discussions you had with counsel and the Post Office's legal representatives about your role as a witness. What was your understanding of your role in the case?***

97. I do not recall any conversations regarding my role in this case.

***Who was the disclosure officer in this case?***

98. I was the disclosure officer in this case.

***Please explain your role in relation to disclosure in these proceedings.***

99. I was the disclosure officer and responsible for providing the documents to Legal Services for reviewing as to whether anything was required to be disclosed to the defence.

***What disclosure requests were made by the Defence in this case, what advice did you provide in relation to any such requests and how did the Post Office respond to them?***

100. Given the passage of time, I do not recall.

***What are your reflections now on the way the investigation and prosecution of Suzanne Palmer was conducted by the Post Office and the outcome of the case? In addressing this question you may wish to consider the following documents:***

- i) The memo from Jennifer Andrews to the Investigations Team dated 31 January 2007 at [POL00052982];***
- ii) The Casework Management Initial Tick List for the Palmer case at [POL00052984].***

101. I did not make any decisions regarding the prosecution of any offenders in any of the cases. That was the responsibility of the DPA on advice from Legal Services. I fulfilled my role in putting the case together for the prosecution once authority had been given to proceed and dealt with any advice on the case from Counsel.

#### **Prosecution of Seema Misra**

***Please provide a full account of your involvement in and recollection of the criminal prosecution of Seema Misra. To assist you in providing this account, please consider the documents referred to below. Your account should address but is not limited to the questions set out below.***

**Please consider the following documents:**

- i) The Audit Report dated 16 January 2008 at [POL00058550];**
- ii) The Investigation Report at [POL00044541];**
- iii) Jarnail Singh's memo to the Investigation Team dated 1 April 2008 at [POL00049658];**
- iv) The emails from April 2008 at [POL00049716];**
- v) Jarnail Singh's memo to the Fraud Team dated 18 November 2008 at [POL00044539];**
- vi) The Schedule of Charges against Seema Misra at [POL00045010];**
- vii) The Summary of Facts at [POL00044613];**
- viii) The signed indictment at [POL00051149];**
- ix) The list of witnesses at [POL00124741];**
- x) The witness statement of Jon Longman, dated 6 January 2009 at [POL00131450];**
- xi) The witness statement of Adrian Morris, dated 6 January 2009 at [POL00131443];**
- xii) Your draft witness statement, dated 6 January 2009 at [POL00050566];**
- xiii) The email at [FUJ00154861].**

***How and when did you first become involved in the Seema Misra case?***

102. I became aware of the audit shortage at West Byfleet Post Office on 14/01/2008 when I was requested to attend the Post Office to assist the OIC, namely Adrian MORRIS with searches. The request was most likely to have come from Adrian MORRIS himself, who was assigned the case at the outset by our Line Manager Paul DAWKINS. I recall meeting Adrian MORRIS and Jon LONGMAN outside the Post Office. Although I do not recall being present when Mrs MISRA was cautioned this is contained within document POL00044541.

***Please provide details of your involvement in the initial investigation.***

103. My involvement in the Seema MISRA case was limited to assisting the OIC along with Jon LONGMAN in conducting searches of the home address and gathering any documentation at the Post Office. This would have been a voluntary search and the relevant consent forms would have been signed as is stated in document POL00044541. To my knowledge I did not have any further involvement in this case.

***Were you aware of any allegations made by Seema Misra relating to the reliability of the Horizon IT system? If so, what did you think the significance of this was?***

104. I was not involved in the interview nor did I have any further involvement in the case after the searches. I did become aware that Horizon was cited as a defence but I do not recall at what point during the investigation this was. I do not recall any of the details nor what issues were raised.

***Who asked you to provide a witness statement? Please provide details of any conversations you had in the drafting of this statement.***

105. I do not recall whether Adrian MORRIS or Jon LONGMAN requested a statement from me. I recall Adrian MORRIS was the original OIC but either due to illness or his subsequent resignation the case was reassigned to Jon

LONGMAN. I cannot recall any conversations regarding my statement. The continuation on the reverse is named as 'Jon Longman' which is clearly (also) incorrect. As there is no signature on the bottom this may well have been a draft copy sent to me for agreeing and then signing but I cannot recall.

***Please describe any further involvement you had in this case.***

106. I do not recall any further involvement in this case after the searches other than providing a witness statement for the OIC.

***What are your reflections now on the way the investigation and prosecution of Seema Misra was conducted by the Post Office and the outcome of the case? In addressing this question you may wish to consider the judgment of the Court of Appeal in Josephine Hamilton & Others v Post Office Limited [2021] EWCA Crim 577 at [POL00113278] (and in particular at paragraphs 75, 91, 198 to 209).***

107. I had limited involvement in the investigation and was not involved in the prosecution case of Seema MISRA.

#### **General**

***To what extent (if any) did you consider a challenge to the integrity of Horizon in one case to be relevant to other ongoing or future cases?***

108. I believed the Horizon system to be robust as documented in the relevant Fujitsu statements provided.

***Are there any other matters that you consider are of relevance to Phase 4 of the Inquiry (Action against Sub-postmasters and others: policy making, audits and investigations, civil and criminal proceedings, knowledge of and responsibility for failures in investigation and disclosure) that you would like to draw to the attention of the Chair?***

109. No

I believe the content of this statement to be true.

Signed:

**GRO**

Dated: 27<sup>th</sup> October 2023

*Red – Documents not received*

**Index to First Witness Statement of Lisa ALLEN**

<b>No.</b>	<b>URN</b>	<b>Document Description</b>	<b>Control Number</b>
1.	POL00104747	Casework Management Policy (version 1.0, March 2000)	POL-0080387
2.	POL00104777	Casework Management Policy (version 4.0, October 2002)	POL-0080417
3.	POL00104754	Rules and Standards Policy (version 2.0, October 2000)	POL-0080394
4.	POL00030687	Investigation Procedures Policy (version 2.0, January 2001)	POL-0027169
5.	POL00104762	Disclosure Of Unused Material, Criminal Procedures and Investigations Act 1996 Codes of Practice Policy (version 1.0, May 2001)	POL-0080402
6.	POL00030578	Royal Mail Group Ltd Criminal Investigation and Prosecution Policy (1 December 2007)	POL-0027060
7.	POL00104812	Royal Mail Group Ltd Criminal Investigation and Prosecution Policy (1 December 2007 – variation )	POL-0080444
8.	POL00104806	Royal Mail Group Security - Procedures & Standards - Standards of Behaviour and Complaints Procedure (version 2, October 2007)	POL-0080438
9.	POL00031003	Royal Mail Group Crime and Investigation Policy" (version 1.1, October 2009)	POL-0027485
10.	POL00030580	Post Office Ltd - Security Policy - Fraud Investigation and Prosecution Policy" (version 2, 4 April 2010)	POL-0027062
11.	POL00030579	Post Office Ltd Financial Investigation Policy (4 May 2010)	POL-0027061
12.	POL00026573	Royal Mail Group Security - Procedures & Standards - The Proceeds of Crime Act 2002 & Financial Investigations" (version 1, September 2010)	POL-0023214
13.	POL00104857	Royal Mail Group Security - Procedures & Standards - Initiating Investigations" (September 2010)	POL-0080489
14.	POL00031008	Royal Mail Group Ltd Criminal Investigation and Prosecution Policy (version 1.1, November 2010)	POL-0027490
15.	POL00104853	Post Office Ltd Financial Investigation Policy (version 2, February 2011)	POL-0080485
16.	POL00104855	Post Office Ltd Anti-Fraud Policy (February 2011)	POL-0080487

17.	POL00030786	Royal Mail Group Policy Crime and Investigation S2" (version 3.0, April 2011)	POL-0027268
18.	POL00105229	Post Office Ltd PNC Security Operating Procedures (August 2012)	POL-0080854
19.	POL00104929	Post Office Limited: Internal Protocol for Criminal Investigation and Enforcement (with flowchart) (October 2012)	POL-0080561
20.	POL00105226	Undated Appendix 1 - POL Criminal Investigations and Enforcement Procedure (flowchart) (October 2012)	POL-0080851
21.	POL00104968	POL – Enforcement & Prosecution Policy"	POL-0080600
22.	POL00030602	Post Office Limited: Criminal Enforcement and Prosecution Policy" (undated)	POL-0027084
23.	POL00031005	Conduct of Criminal Investigations Policy (version 0.2, 29 August 2013)	POL-0027487
24.	POL00027863	Conduct of Criminal Investigations Policy" (version 3, 10 February 2014)	POL-0024504
25.	POL00030902	Conduct of Criminal Investigations Policy" (September 2018)	POL-0027384
26.	POL00123309	Email dated 9 July 2014 from Dave Posnett	POL-0129508
27.	POL00123310	Investigation Communication 6-2014	POL-0129509
28.	POL00123311	2.2 Joint Investigation Protocols - RMGS and PO Ltd Security - Version 1.0 Final	POL-0129510
29.	POL00123312	Memo on Joint Investigation Protocols	POL-0129511
30.	POL00104821	Condensed Guide for Audit Attendance" (version 2, October 2008)	POL-0080453
31.	POL00118096	David Posnett's email dated 23 May 2011	VIS00012685
32.	POL00118101	Guide to the Preparation and Layout of Investigation Red Label Case Files – Offender reports & Discipline reports"	VIS00012690
33.	POL00118102	The Offender Report template	VIS00012691
34.	POL00118104	Identification Codes	VIS00012693
35.	POL00121772	Email from Dave Pardoe, dated 30 August 2011	POL-0128032
36.	POL00121773	Attachment to the email from Dave Pardoe, dated 30 August 2011	POL-0128033
37.	FUJ00153133	Email from Thomas Penny dated 15 July 2010	POINQ0159328F
38.	FUJ00156491	Email from Andy Dunks dates 12 July 2011	POINQ0162685F
39.	FUJ00156309	Email from Thomas Penny dated 4 November 2010	POINQ0162503F
40.	FUJ00156151	Email from Gareth Jenkins dated 25 May 2010	POINQ0162345F
41.	FUJ00156140	Email from Gareth Jenkins dated 12 May 2010	POINQ0162334F

42.	FUJ00156067	Email from Andy Dunks dates 6 January 2010	POINQ0162261F
43.	FUJ00155987	Email form Peter Sewell dated 2 March 2009	POINQ0162181F
44.	FUJ00153099	Email form Thomas Penny dated 12 May 2010	POINQ0159294F
45.	POL00068283	Audit report dated 3 February 2006	POL-0064762
46.	POL00053009	The Record of Tape Recorded Interview of Suzanne Palmer on 6 February 2006	POL-0049488
47.	POL00053007	The Investigation Report by Lisa Allen dated 20 February 2006	POL-0049486
48.	POL00053005	The Notification of Proceedings to Police form in this case	POL-0049484
49.	POL00053006	The Notification of Proceedings to Police form in this case	POL-0049485
50.	POL00052990	Jarnail Singh's memo to the Investigation Team dated 10 March 2006	POL-0049469
51.	POL00053011	The Schedule of Charges	POL-0049490
52.	POL00052987	Jarnail Singh's memo from Lisa Allen to you dated 6 April 2006	POL-0049466
53.	POL00052994	Jarnail Singh's memo to the Investigation Team dated 15 May 2006	POL-0049473
54.	POL00053001	Jarnail Singh's memo to the Investigation Team dated 23 June 2006	POL-0049480
55.	POL00052991	Jarnail Singh's memo to the Investigation Team dated 11 July 2006	POL-0049470
56.	POL00053003	Jarnail Singh's memo to the Investigation Team dated 26 July 2006	POL-0049482
57.	POL00053008	Advice from Counsel dated 25 July 2006	POL-0049487
58.	POL00052986	The Indictment	POL-0049465
59.	POL00053002	Memo from Phil Taylor to the Investigation Team, dated 23 August 2006	POL-0049481
60.	POL00052993	Memo from Jennifer Andrews to the Investigations Team dated 14 September 2006	POL-0049472
61.	POL00052998	Memo from Jennifer Andrews to the Investigations Team dated 20 September 2006	POL-0049477
62.	POL00052992	Memo from Jennifer Andrews to the Investigations Team dated 11 October 2006	POL-0049471
63.	POL00052988	The memo from Jennifer Andrews to the Investigations Team dated 8 November 2006	POL-0049467
64.	POL00052989	The memo from Jennifer Andrews to the Investigations Team dated 9 November 2006	POL-0049468
65.	POL00052995	The memo from Jennifer Andrews to the Investigations Team dated 17 January 2007	POL-0049474

66.	POL00052997	Jarnail Singh's memo to the Investigation Team dated 19 January 2007	POL-0049476
67.	POL00053000	Jarnail Singh's memo to the Investigation Team dated 23 January 2007	POL-0049479
68.	POL00052982	The memo from Jennifer Andrews to the Investigations Team dated 31 January 2007	POL-0049461
69.	POL00052984	Casework Management Initial Tick List for the Palmer case	POL-0049463
70.	POL00058550	Audit Report dated 16 January 2008	POL-0055029
71.	POL00044541	Investigation Report	POL-0041020
72.	POL00049658	Jarnail Singh's memo to the Investigation Team dated 1 April 2008	POL-0046137
73.	POL00049716	The emails from April 2008	POL-0046195
74.	POL00044539	Jarnail Singh's memo to the Fraud Team dated 18 November 2008	POL-0041018
75.	POL00045010	The Schedule of Charges against Seema Misra	POL-0041489
76.	POL00044613	The Summary of Facts	POL-0041092
77.	POL00051149	Signed indictment	POL-0047628
78.	POL00124741	The list of witnesses	POL-0131022
79.	POL00131450	Witness statement of Jon Longman, dated 6 January 2009	POL-0121286
80.	POL00131443	The witness statement of Adrian Morris, dated 6 January 2009	POL-0121279
81.	POL00050566	My draft witness statement, dated 6 January 2009	POL-0047045
82.	FUJ00154861	Email from John Longman dated 18 November 2009	POINQ0161056F