

## CLI Review of R v Lisa Brennan<sup>1</sup>

### Case Summary

#### Introduction

1. Lisa Margaret Brennan was employed as a Crown Office employee on 18 September 1989<sup>2</sup> and worked in various Post Office branches as a counter clerk. From June 1995, she worked as a counter clerk at the Huyton Post Office, Liverpool. Her employment was terminated on 2 June 2002. She had no previous convictions recorded against her.<sup>3</sup>
2. On 4 September 2003, she was convicted by a jury of 27 counts of theft following a trial at Liverpool Crown Court. She was acquitted of a further five counts of theft. On 6 September 2003, she was sentenced to six months' imprisonment suspended for two years in respect of the shortfall at Huyton Post Office of £3,482.40.
3. Mrs Brennan was one of the 39 appellants whose convictions were quashed by the Court of Appeal in the case of *Hamilton and Others* [2021] EWCA Crim 577. Post Office Limited ('POL') conceded that her prosecution was unfair (Ground 1), and the Court additionally ruled that her prosecution was also an affront to justice (Ground 2). Her previous appeal against conviction had been dismissed on 11 May 2004.<sup>4</sup>
4. Mrs Brennan has given human impact evidence to the Inquiry.

#### Prosecution Case

5. During an audit on 2 June 2002, shortly after the rollout of the Horizon system, various discrepancies were identified at the Huyton branch where Mrs Brennan worked with others. It was alleged that those discrepancies occurred whilst Mrs Brennan was paying out cash for allowance and benefit vouchers, by removing more money than the vouchers permitted and effectively keeping the difference herself: £3,482.40. The evidence relied

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<sup>1</sup> This document was drafted after a review of **112 documents** tagged as relevant to the case of Lisa Brennan, together with reference to the Court of Appeal (Criminal Division) judgment of *Hamilton and Others* [2021] EWCA Crim 577 and the initial Case Summary prepared by Helen Jones on 18 May 2020.

<sup>2</sup> Doc ID POL-0089914 – Email from Ainslie Cranwell to Martin Smith and Harry Bowyer, cc'ing Rodric Williams, dated 31 October 2019. Re Post Office Horizon Litigation.

<sup>3</sup> Doc ID POL-0043805; POL-0087911 [Inquiry URN: POL00047326] – Consignia Antecedents Form.

<sup>4</sup> Doc ID POL-0063081; POL-0089815 [Inquiry URN: POL00066602] – Appealed on the basis of inconsistent verdicts: *R v. Brennan* [2004] EWCA Crim 1329.

upon to support the charges of theft was the difference between the amount Horizon showed had been entered onto the system and the lesser amount of the voucher(s) that had been cashed.

6. Of the 32 counts of theft, a significant number included more than one discrepancy: in other words, each count alleged theft in a particular sum, but the sum was in some cases attributable to either a single incorrect voucher or multiple incorrect vouchers.

#### Defence Case

7. Ms Brennan admitted that there were discrepancies, but she said that the errors on her part were: GRO and the pressures of work. She denied theft and said she did not know what had happened to the money.

#### Interview of Lisa Brennan

8. Lisa Brennan was interviewed under caution by Steve Bradshaw and Anthony Gardner on 13 June 2002 (between 10.10am and 11.10am) at the Huyton Delivery Office in Liverpool.<sup>5</sup> Also present was a Union representative, Steve Owens. She declined the offer to have a solicitor present during the interview.
9. The interviewers proceeded to ask Lisa Brennan questions about the alleged offences and her involvement. A record of taped interview is amongst the available papers<sup>6</sup>. The following points are noted:
  - a) Ms Brennan explained that she had been employed by POL for 13 years, having worked at various post offices. The last 7 years were at Huyton Post Office, where she performed a full range of counter duties. She normally worked 30 hours a week from Monday to Thursday, but also had shifts on Saturdays.
  - b) When asked about the process of paying out a pension and allowance voucher, Ms Brennan explained the process and the procedure for rectifying any mistakes or reversals. She was asked what she would do if she was given a

<sup>5</sup> Doc ID POL-0043792; POL-0087902 [Inquiry URN: POL00047313] – Submission of Tapes for Transcription and Doc ID POL-0043997 – Witness Statement of Anthony Gardner, undated.

<sup>6</sup> Doc ID POL-0043799; POL-0087910 [Inquiry URN: POL00047320] – Record of Taped Interview of Lisa Brennan, 13 June 2002, between 10.10 and 10.52 (25 pages)

pension docket for “£50 and accidentally entered £250 on the screen – would she pay out £50 or £250. She replied: *“I don’t know, maybe, maybe not, I don’t know, it depends if I notice it. It’s that fast and busy in here, it depends if you notice it”*. When asked what she would think about someone who was repeatedly making such mistakes to the value of £100.00 or £200.00 her reply was, *“They were crap. Well not too much crap, I don’t know. If you’re saying it’s me, I don’t know. You’re not gonna say I’m crap, I thought I was doing my job all right”*. The interviewers commented on her nervousness and offered her a drink of water noting that they were not there to hound her, just to “get to the bottom of the truth”.

- c) In response to being asked how often she prepared her pensions and allowance vouchers Ms Brennan replied every day if it’s not busy. After counting the number of vouchers, they would be checked against the tally on the Horizon print off. It was confirmed that she understood the impact of paying out the correct amount of money but the wrong amount being entered on Horizon. She was asked what her balancing record had been like and she replied “it’s been alright.”
- d) Ms Brennan was asked about a B stock transaction on 6 June 2002 where a voucher for £26.30 had been declared and paid out as £226.30. She confirmed that it was her user ID (LBR001) which had processed that transaction. She had no explanation as to why £226.30 was paid out. It was noted that her stock was only £2 out [but it appears the interviewers may have meant £200] that day and therefore the missing money can’t have been left in the till. She responded that she had given it away. She was asked to clarify whether she is saying that when a customer came in to collect their child benefit for £26.30, she had accidentally paid out £226.30, to which she replied, *“I must have done, yeh”*. She was asked what would happen if the investigators tracked down the individual who holds this particular benefit book – whether they would confirm that they had been given £226.30 instead of £26.30. Ms Brennan replied: *“If they’re honest they’ll say yeh, if they’re not they’ll say no.”* She was asked again, “you’re saying you paid out £226.30?” to which she replied, *“I must have done, I didn’t know, I haven’t got it.”*

- e) A similar exercise was undertaken for a voucher of £15.75 that had been fed in as £115.75 on 23 May 2000. She confirmed that this transaction had also been performed by her user ID (LBR001).
- f) She was asked about a transaction of £250.60 on 31 May 2002 which does not correlate with any of the retained dockets. As an explanation, Ms Brennan said that she believed it to be “*a mistake*” as “*I’m not doing the job very good*”. She was asked about the fact that when she was on leave, there were no discrepancies in the vouchers, to which she replied, “*I can’t believe it*”. She was asked, so you admit that you’re making the discrepancies then? She replied: “*Well I obviously have, haven’t I? Its me whose logged on*”.
- g) It was suggested to her that with 13 years’ experience, it is unlikely that she has been so careless as to make this many mistakes. She was asked whether she thought someone else may be using her user ID and she said no, but she works fast and tries to get through the queue as quickly as she can.
- h) She was asked about vouchers for £35.05 and £76.95, which had been put through the system as £135.05 and £176.95, It was suggested to her that her previous explanation of accidentally double-keying the first digit would not explain these errors. If she had made the same error with these transactions, the amount put through would have been £335.05 and £776.95, but on both occasions an extra £100 had been put through the system. She agreed that that explanation would not explain these discrepancies. Similarly, in week 44, £115.50 was claimed as £215.50 and £22.48 was claimed as £122.48. She was asked “*If it’s not carelessness and it’s not somebody else doing it, what does that leave us with?*” Ms Brennan replied: “*you think I’m taking it*”. She was asked if she was taking it and she responded: “*No, I haven’t got it. Not that that’s an excuse, [GRO] not that it’s an excuse. My head’s up my arse most of the time, I’m sorry. I’m trying to work as fast as I can.*”
- i) She was asked again about her balances (i.e. if these were genuine errors, she would have found a discrepancy when balancing) and she stated “no, I’ve balanced alright.” The following exchange then took place:

*Q. We've got a choice of 2 things haven't we Lisa, either you're totally incompetent and you're costing the Post Office 3 or 4 hundred pounds a week and therefore we can't afford to keep you...*

*A: Don't sack me.*

*Q. Or you're fiddling the pensions deliberately and you're pocketing the money.*

*A. No, I haven't got it, I haven't got it, I haven't.*

*Q. Someone's got it.*

*A. I haven't got it.*

- j) Ms Brennan was asked why these issues were just happening in the pensions and not the giro or savings bank. Her answer was, “*dunno*” and denied deliberately taking the money. As to why nobody else was making the same number of mistakes, Ms Brennan said that “*they don't work as fast as me. I've been working dead fast. I haven't got nothing new, I haven't got fridges and freezers and whatever else have you, I've got nothing*”.

10. After the tapes were changed the interview continued in the presence of the same persons between 10.55am and 11.10am. A summary of the subsequent record of taped interview is amongst the available papers<sup>7</sup>. The following points are noted:

- a) The interviewing officers again queried why the discrepancies only appeared in the pension and allowances, to which she repeated, “*No, I've got no explanation*”. She agreed that losses of £1,000.00 in a few weeks were a little bit more than careless. Ms Brennan maintained that, “*Yeh. I haven't got it, that's all I can say. I haven't got it...what if I'm serving them and say I pay off the docket and I'm giving it somewhere else short in the day and not knowing or ... I know I'm like clutching at straws here*”. Asked whether she was making two mistakes, she responded, “*Several, I don't know. I really don't know*”.
- b) Further in the interview, Ms Brennan stated that, “*I don't know what to say, I haven't got it, I haven't got it. I don't want to lose my job if I'm crap or even if*

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<sup>7</sup> Doc ID POL-0043798; POL-0087909 – Record of Taped Interview of Lisa Brennan, 13 June 2002, between 10.55 and 11.10 (9 pages)

*you think I'm robbing. I don't want to lose my job.* When asked why POL should continue to employ her, she repeated, *"I don't want to lose my job. I love my job. I thought I was good at my job"*.

- c) Ms Brennan denied stealing the money and did not know who else might have taken it. Towards the end of her interview, she showed the officers her latest personal girobank statement which was in credit of £582.00. The officers conceded that *"we can safely say that if any money's been salted away it's not been put into the giro account"* Upon being asked whether she wished to add anything, she said, *"No. I'm sorry"*.

#### Schedule of Charges

11. A form sent to the police to notify them of the criminal proceedings shows that Ms Brennan was initially charged with a single offence of theft, totalling £22,000.00, contrary to section 1 of the Theft Act 1968.<sup>8</sup> Neither the Schedule of Charges nor the Summons are within the papers, so it is unclear whether this was amended in advance of the first appearance and/or following independent legal advice.

12. It is further unclear what charges were committed to the Crown Court.

#### The Indictment

13. The preferred indictment in this case contained 32 counts of theft, contrary to section 1 of the Theft Act 1968. The alleged offending spanned 20 December 2001 to 6 June 2002.

#### Court Hearings

14. Ms Brennan attended her first appearance before Liverpool Magistrates' Court on 6 February 2003.<sup>9</sup> Not guilty pleas were entered, and she elected to be tried in the Crown Court. The case was committed to the Crown Court at a committal hearing on 3 April 2003.

<sup>8</sup> Doc ID POL-0043806; POL-0087912 [Inquiry URN: POL00047327] – NPA 01.

<sup>9</sup> Doc ID POL-0043968; POL-0087948 [Inquiry URN: POL00047489] – Internal Memo from Steve Bradshaw, dated 6 February 2003.

15. Ms Brennan was arraigned on the 32-count indictment at the Preliminary Hearing at Liverpool Crown Court on 14 May 2003.
16. Various Mentions were then listed in advance of the trial that commenced on 2 September 2003. Verdicts were returned by the jury on 4 September 2003.<sup>10</sup>
17. The prosecution called two witnesses: Kathryn Rosenthal<sup>11</sup> (Branch Manager at Huyton Post Office) and Steve Bradshaw<sup>12</sup> (investigating officer).<sup>13</sup>
18. Ms. Brennan gave evidence in her Defence. A short precis is contained within the transcript (pp. 8 and 9) of HHJ Phipps' Summing Up:
  - a) She was a person of good character who had worked at the post office without any complaints about her work or previous disciplinary action. She had been working as a counter clerk at Huyton Post Office.

b)

**GRO**

- c) In terms of work, she was being required to perform quickly and efficiently ("fast") in a branch that she described as a "nightmare" because of the working environment and how busy it was. Certain individuals, including herself, were being required to carry out additional duties.

d)

**GRO**

<sup>10</sup> Doc ID POL-0063192; POL-0089835 [Inquiry URN: POL00066713] – Summing Up of HHJ Phipps and Verdicts at Liverpool Crown Court on 3 and 4 September 2003 and Crown Court Log for T20030498.

<sup>11</sup> Doc IDs POL-0043980; POL-0087954 [Inquiry URN: POL00047501] and POL-0043979; POL-0087953 [Inquiry URN: POL00047500] – Witness Statement of Kathryn Rosenthal, dated 11 March 2003. Doc ID POL-0043993; POL-0087974 [Inquiry URN: POL00047514] – Witness Statement of Kathryn Rosenthal, dated 2 June 2003. Doc ID POL-0043999; POL-0087984 [Inquiry URN: POL00047520] – Witness Statement of Kathryn Rosenthal, dated 22 July 2003. The full list of served witness statements (Doc ID POL-0043983; POL-0087956 [Inquiry URN: POL00047504]) and exhibits (POL-0043981; POL-0087955) are within the papers but not the actual documents.

<sup>12</sup> Doc IDs POL-0087959 and POL-0043986; POL-0087958 [Inquiry URN: POL00047507] – Witness Statement of Steve Bradshaw, dated 3 March 2003.

<sup>13</sup> Doc ID POL-0044008; POL-0088002 [Inquiry URN: POL00047529] – Attendance Note of Trial at Liverpool Crown Court, dated 7 October 2003.

- e) The day before her disciplinary interview in July 2002, she had received a letter setting out all the mistakes in her name. Mrs Brennan had noticed that some of the mistakes attributed to her were in fact recorded under the name of Linda Buchanan, a fellow counter clerk at Huyton branch.
- f) During her evidence, she produced a bundle of her bank statements to show that throughout the relevant period her accounts were in credit. She told the jury that, *“I wish I could say how the discrepancies arose. I couldn’t believe it when I heard about these matters”*. She denied stealing any of the money.

#### Human Impact Evidence at the Inquiry

15. Lisa Brennan submitted written evidence to the Inquiry in the form of a signed witness statement, dated 14 January 2022.<sup>14</sup> In summary she stated as follows:

- a) Her life was going well until everything fell apart in 2002 (para. 7).
- b) She worked as a counter clerk at Childwell Valley between the ages of 16 and 21, when she moved to work for the Crown Post Office (paras. 9 to 10). By 1995 she was working at Huyton Post Office as a counter clerk (para. 11). Her intention was to remain there until her retirement, and in doing so she had won awards and earned bonuses. She was happy with her job (paras. 12 to 14).
- c) The Horizon system was installed between 1999 and 2001, without her being given any training from the Post Office (para. 15).
- d) The branch employed approximately 10 members of staff. Another employee shared the same initials as her: “LB”. The staff would make mistakes but there was never an expectation that the shortfall needed to be repaid (paras. 17 to 19).
- e) She recounted that an audit was undertaken on 2 June 2002, that a shortfall of £3,000.00 had been identified and she was later interviewed without legal representation. The interview *“felt like an eternity. I was so intimidated and the*

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<sup>14</sup> First Written Witness Statement of Lisa Margaret Brennan, dated 14 January 2022 (15 pages):  
<https://www.postofficehorizoninquiry.org.uk/sites/default/files/2022-02/WITN01710100%20-%20Lisa%20Brennan%20-%20First%20Statement.pdf>

*experience was awful. They were insulting throughout and made unprofessional comments about my weight and my hair. This was horrible. I felt like I was in a no-win situation”* (paras. 21 to 25).

- f) After the interview she was suspended and told to leave the branch. Her contract with the Post Office was later terminated (para. 26).
- g) She explained how she pleaded not guilty and her case proceeded to a trial at Liverpool Crown Court. She maintained her not guilty plea as she *“had done nothing wrong, so why would I plead anything different”* (paras. 33 to 40).
- h) Whilst waiting for the jury’s verdict, she had to say goodbye to her daughter. *“She went to school rather than coming with me. She knew there was a chance that I might not be coming home. I was very open with her. I told her that if I was sent to prison, I was never coming home. I could not cope with that and I would end my life. It was heart breaking to have to have such a conversation and to say goodbye. ... it was unbearable. She was only 6”* (paras. 42 to 44).
- i) She was in *“total shock”* after being convicted (para. 47). She felt *“numb”* about being made subject to a suspended sentence” and *“couldn’t believe that I had been convicted of an offence that I did not commit* (para. 52 to 54).
- j) It was said that *“throughout my career, I had shown nothing but loyalty, hard-work, and dedication to my Post Office branch, and in return I was branded a criminal. I was so upset and ashamed* (paras. 55 and 56).
- k) Without any income she became bankrupt, homeless and could not obtain a bank account. She was eventually given a council flat. Her financial predicament resulted in her selling jewellery and rely upon assistance from the Salvation Army (paras. 83 to 90 and 123 to 125). She described how, *“the whole situation with the Post Office has had a significant impact on my well-being and self confidence and has caused myself and my family so much hurt over the years”* (para. 153).

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<sup>15</sup> Transcript of 15 February 2022, at pages 39 to 67 (PDF):  
<https://www.postofficehorizoninquiry.org.uk/sites/default/files/2022-02/POH%2015%20February%202022.pdf>

16. She provided oral evidence to the Inquiry on 22 February 2022.<sup>15</sup> The majority of her evidence repeated the content of her witness statement as set out at para. 16(a)-(x) above.

17. In addition, Mrs Brennan raised the following points:

- a) In relation to being interviewed under caution, she stated that she was allowed to take a friend in with her, Maureen, *“who just sat with me because we didn’t have a clue what was going on. It was frightening”* (page 47, lines 1 to 5).
- b) That she was not offered the opportunity to consult with a lawyer in advance of the interview under caution (page 47, lines 6 to 7).
- c) The interview itself was described as, *“horrible”*. With the interviewers being, *“quite derogatory”* in the way they spoke to her (i.e., *“Got a car, have you? ... Got a car, oh, look at the earnings you’ve got in. Bit of a big girl, do you like going out for meals? Have you got lots of money”* (page 47, lines 11 to 23).
- d) Mrs Brennan told the Inquiry that HHJ Phipps appeared *“gobsmacked”* by the jury’s verdict and the court clerk also began to cry. She believed that was the reason for the judge replying to the costs and compensation applications in the following way, *“Stick a penny on a stamp”* (page 51, lines 15 to 25, to page 53, lines 1 to 7).
- e) Mrs Brennan described the whole experience as *“scandalous”* and finished by saying that in the interview room it had been suggested to her that, *“It’s only you, nobody else is making these mistakes, it’s only you”*. But that ultimately it wasn’t just her. (page 64, line 25, to page 65, lines 1 to 11).

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<sup>15</sup> Transcript of 15 February 2022, at pages 39 to 67 (PDF):  
<https://www.postofficehorizoninquiry.org.uk/sites/default/files/2022-02/POH%2015%20February%202022.pdf>



Q.126. What (if any) role did financial or reputational considerations play?	There is no material available which suggests that financial or reputational considerations played any role in terms of the scope of enquiries undertaken.	
Q.127. Who was responsible for supervising or reviewing the conduct of this investigation?	It is not known who within the POL Investigation Team supervised or reviewed the investigation, however it is clear that the reviewing lawyer reviewed the case when she provided advice.  There is no charging memo or post charge advice in the papers, so it is not known what legal considerations were raised after 12 July 2002.	POL-0043984; POL-0087957 [Inquiry URN: POL00047505]
Q.129. To what extent (if at all) was independent oversight exercised in relation to the conduct of these criminal investigations? By whom was it exercised and was it adequate?	External solicitors, Messrs Silverbeck Rymer Solicitors, were instructed to deal with the Magistrates' Court proceedings. They in turn instructed counsel to cover the Crown Court hearings and trial. The nature and extent of any independent advice they provided is not known from the available papers.	

### **Charging**

Q.130. Who made the charging decision?	Not known from the available papers, although Teresa Berridge provided a pre-charge advice to the investigator on 12 July 2002.	
Q.133. What policies, guidance or principles did they apply when making charging decisions? Were they suitable and applied appropriately?	Not known as there is no charging memo or advice in the reviewed papers. The internal memo of 12 July 2002 from Teresa Berridge refers to, " <i>sufficiency of evidence and likely prospect of conviction</i> "	
Q.134. What (if any) legal advice did they receive concerning the appropriateness of bringing charges in individual cases?	Not known as there is no charging memo or legal advice in the reviewed papers.	
Q.135. What (if any) action did they take upon receipt of such advice?	Ms Brennan was charged with theft (circa. £22,000). A summons would have been obtained leading to the eventual 32 counts that featured on the preferred indictment at Liverpool Crown Court.	POL-0043806; POL-0087912 [Inquiry URN: POL00047327]
Q.136. Was an offence of theft charged? If so, was there sufficient evidence to support it? Did the charge place improper pressure on the D? Was that intended?	Yes (32 separate offences).  As the Court of Appeal noted in <i>Hamilton and Others</i> at para. 289: " <i>there was no evidence to corroborate the Horizon evidence. The issue at trial was dishonesty but there was insufficient proof of an appropriation</i> ".	
Q.137. Who was responsible for supervising or reviewing	It is not known from the available papers who (if anyone) within the POL supervised or reviewed the	

<p>the charging decision?</p>	<p>charging decision, and nor is the charging memo within the papers. Independent solicitors were instructed to prosecute the matter in the Magistrates' Court: Messrs Silverbeck Rymer Solicitors of Liverpool.</p> <p>Independent counsel was instructed to prosecute the trial. Similarly, Had counsel considered the charging decision to be wrong or inappropriate, they would have been bound to advise as such.</p>	<p>POL-0088044</p>
<p>Q.139. To what extent (if at all) was independent oversight exercised in relation to charging decisions? By whom was it exercised and was it adequate?</p>	<p>External solicitors were instructed as prosecuting agents: Messrs Silverbeck Rymer Solicitors. They in turn instructed independent counsel to prosecute the case in the Crown Court.</p>	

**Prosecution**

<p>Q140. Who was responsible for conducting the prosecution?</p>	<p>Teresa Berridge (Senior Lawyer).</p> <p>On or around 20 November 2002, Silverbeck Rymer Solicitors based in Liverpool were instructed to act as external agents in advance of the first appearance at Liverpool Magistrates' Court.</p> <p>The Crown Court Log refers to independent counsel Miss Zillah Williams conducting the trial at Liverpool Crown Court.</p>	<p>POL-0043809; POL-0087917 [Inquiry URN: POL00047330]</p> <p>POL-0043810; POL-0087918 [Inquiry URN: POL00047331]</p> <p>POL-0043959; POL-0087946 [Inquiry URN: POL00047480]</p> <p>POL-0063193; POL-0089836 [Inquiry URN: POL00066714]</p>
<p>Q.143. What legal advice did they receive concerning the appropriateness of pursuing private prosecutions in individual cases?</p>	<p>Not known as there is no charging memo or legal advice in the reviewed papers.</p>	
<p>Q.144. What action did they take upon receipt of such advice?</p>	<p>It is known that Ms Brennan was charged and arraigned on a 32 count indictment in the Crown Court.</p>	
<p>Q.146. Who was responsible for supervising or reviewing the conduct of the prosecution?</p>	<p>It is not known from the available papers who (if anyone) within POL supervised or reviewed the conduct of the prosecution. External solicitors were however instructed as prosecuting agents together with</p>	

	independent counsel. Independent counsel has a continuing duty to advise as to the appropriateness of proceeding with a case.	
Q.148. How (if at all) was supervision of private prosecutions exercised?	Not known from the available papers, other than external lawyers were instructed.	
Q.149. To what extent (if at all) was independent oversight exercised in relation to the conduct of prosecutions?	External solicitors, Messrs Silverbeck Rymer Solicitors, were instructed to prosecute the court proceedings and they in turn instructed independent counsel to deal with the Crown Court proceedings.	

### **Disclosure**

Q150. Who was responsible for making disclosure decisions?	Steve Bradshaw is named as the Disclosure Officer on the blank Disclosure Officer's Report and Sensitive Schedule.  The disclosure decisions were likely made by the reviewing lawyer, Ms Berridge.	POL-0043970; POL-0087949 [Inquiry URN: POL00047491]  POL-0043971; POL-0087950 [Inquiry URN: POL00047492]
Q.153. What legal advice did they receive concerning duties of disclosure?	Not known from the available papers.	
Q.154. What action did they take upon receipt of such advice?	A Disclosure Officer's Report, Sensitive Schedule (containing one item) and Non-Sensitive Schedules (including 12 items) were all prepared in this case.	POL-0043970; POL-0087949 [Inquiry URN: POL00047491]  POL-0043971; POL-0087950 [Inquiry URN: POL00047492]  POL-0043996; POL-0087975 [Inquiry URN: POL00047517]
Q.155. What factors influenced the scope of disclosure?	Not known from the available papers.	
Q.156. What (if any) role did financial or reputational considerations play?	Not known. There is no material in the papers now available to suggest that financial or reputational considerations played any role in terms of the scope of disclosure.	

Q.157. Were the decisions which they took in relation to disclosure appropriate?	See the judgment of the CACD in Hamilton & Ors.	
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**Negotiation and Acceptance of Pleas**

Q158. Who was responsible for decision-making re: negotiation and acceptance of pleas?	Not applicable.	
Q.159. What policies, guidance or principles did they apply when making their decisions? Were they suitable and applied appropriately?	Not applicable.	
Q.160. In what circumstances and upon what conditions were charges not pursued? Were these appropriate?	Not applicable.	
Q.161. In what circumstances and upon what conditions were pleas accepted? Were these appropriate?	Not applicable.	