

## Message

---

**From:** Jane MacLeod [GRO]  
**on behalf of** [GRO]  
**Sent:** 30/10/2015 17:07:29  
**To:** Tim Parker [GRO]  
**Subject:** Post Office - Investigation update

Tim

As promised, I have set out below my first update on progress of the investigation.

**Resourcing**

- Jonathan is now being supported in his work by junior counsel, Christopher Knight, from the same Chambers and we had a lengthy and productive briefing meeting with Chris earlier this week. We are also in discussion with their clerk to agree fees.

**Scope**

- We have agreed with Jonathan and Chris that the review will follow the four principal lines of enquiry identified in your meeting with Jonathan. These have been slightly re-phrased as follows:
  1. Whether the Post Office has had, and has adhered to, appropriate prosecution policy and practices to ensure that individual criminal charges brought against subpostmasters were/are underpinned by a sufficiency of evidence;
  2. Establishing, in so far as possible, whether the Horizon system was or was not the underlying cause of discrepancies in the branch accounts of Applicants to the Scheme;
  3. Whether the advice provided to Applicants to the Scheme by the Helpdesk was appropriate and, in particular, whether the advice provided caused Applicants to commit false accounting; and
  4. Whether the investigations into the cases in Scheme were appropriate and reasonable in scope and depth and, in particular, whether anything was missed which could, and ought now, to be looked at.

**Nature of the report to be provided to you**

- At this stage we propose that Jonathan will provide you with a legally privileged report structured along thematic lines. It is not our intention that this report would be made public, and we will therefore need to consider the best way for your findings to be presented in way that can be made public. We will keep the thematic approach under review to ensure that it remains appropriate.
- Jonathan and Christopher propose to undertake their work through a review of relevant documentation; interviews with key Post Office personnel, external experts and interested parties. In certain cases it will be necessary for them to understand the detail of what happened in practice, and to do this they will conduct a sampling exercise and review specific cases that are reflective of the Post Office's total caseload. Collectively, we think this is the most expedient way of proceeding without compromising quality and rigour.

**Provision of Information**

- We have sent across to Jonathan and Chris copies of all core documents and legal advice. We are also preparing a spreadsheet setting out key information about each of the 136 cases in the Scheme, including which cases involve multiple criminal charges, allegations in relation to Horizon, to the Helpdesk and so on, and, which will enable Jonathan and Christopher to determine which of the cases they wish to review.

**Meetings**

- We are arranging various meetings between Jonathan and Christopher and relevant Post Office staff and external interested parties. This will include Lord Arbuthnot, Second Sight and Alan Bates (head of the Justice for Subpostmasters' Alliance). We understand that your diary is already committed for November and early December, however we asked Diane Blanchard what options there are for you to meet Lord Arbuthnot and Second Sight relatively quickly.

Please let me know if you have any questions or would like more detail on any of the above.

Kind regards,

Jane



**Jane MacLeod**

General Counsel  
Ground Floor  
20 Finsbury Street  
LONDON  
EC2Y 9AQ

Mobile number: