



LEGALLY PRIVILEGED AND CONFIDENTIAL

POST OFFICE GROUP ACTION

INFORMATION FOR WITNESSES

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Background

Post Office is defending a claim brought against it by 500+ postmasters who are being represented by solicitors, Freeths (**Group Action**). The postmasters include Subpostmasters, Crown Office employees, Assistants, Franchisees, and Operators under the Network Transformation contracts (**Claimants**). Womble Bond Dickinson (UK) LLP is representing Post Office in this litigation.

The Claim is proceeding in the High Court in London. It began in 2016 and may well last for quite a while longer, with a first stage trial due to take place in November 2018.

The claims brought by the Claimants are robustly denied by Post Office. The broad areas of Post Office's operation which are relevant to the claims are:

- Recruitment and interview process
- Location of branch
- Preparation of contracts and manuals
- Signing of contracts and changes to contracts once signed / new products
- Practical arrangements for branches
- Contact / support between Post Office and postmasters during ongoing relationship
- Holiday and sickness
- Training for those working in branch
- Assistants
- Dealing with problems in branch/ shortfalls
- Dishonesty / false accounting by postmasters
- Helpline / NBSC
- FSC (role of)
- Security team (role of)
- Audit team (role of)
- Accounting
- Horizon
- Contractual breach / performance issues
- Suspension
- Temporary substitutes
- End of Post Office's relationship with postmaster (however that happens)
- Criminal investigations and prosecutions
- Civil claims / recoveries action / Chesterfield

Your evidence

You have been nominated as someone with knowledge of one or more of these areas. We need to speak to you so that we can understand the areas about which you are knowledgeable. From the information we receive from you and other documentary evidence, we will prepare your witness statement. The witness statement will outline and explain Post Office's practice and processes regarding the above issues and how these practices have changed during the relevant time (from 1998 to 2016).

We will use your proof of evidence as a basis for drafting your witness statement. It is important that you are comfortable with everything that is said in your witness statement and that the text of the statement is

in your own words. We may need to speak to you again about particular points and there may be several drafts for you to review. Once finalised, we will ask you to sign the statement of truth (explained below).

After the exchange of witness statements has taken place, we may ask you to read what is being said by the witnesses appearing for the Claimants. Your comments on those statements could be helpful in preparing for the trial.

Statement of truth

Your evidence is very important and you need to be comfortable that what you are saying is accurate.

Your witness statement will be verified by a "statement of truth". This is a statement confirming that the person making it believes that the facts stated in the document are true. When you are signing the statement of truth, you are confirming that the facts contained within the statement are true to the best of your knowledge.

The penalties for signing a statement of truth without an honest belief in the truth of the facts being verified are potentially severe. A person who knowingly makes a false statement in litigation in an attempt to interfere with the course of justice will be in contempt of court, which is punishable by a prison sentence of up to two years.

Where you do not have first-hand knowledge of facts and matters which are set out in the witness statement, you should carry out sufficient investigation to satisfy yourself of the truth of the matters stated. We will assist you in undertaking these checks from the available documentation.

Future steps

The trial of this matter is listed for November 2018. Please could you continue to keep November 2018 free in your diaries. If you already have commitments or intend to book any holiday in this period, please could you let [dave.panaech](#) **GRO** and [victoria.brooks](#) **GRO** know.

You will most likely be asked to attend court to explain the issues covered in the witness statement to the Judge. You will need to prepare for giving evidence at the hearing by carefully reviewing your statement and any relevant documents referred to in it. You will also be asked questions on the evidence by the Claimant's representatives.

If you are required to attend trial and give evidence, we will arrange for you to have some training on what to expect in a court room beforehand, to help make you feel as comfortable as possible on the day.

Questions

If you have any questions about scheduling meetings, please contact Ria Hattam on [ria.hattam](#) **GRO** **GRO** or **GRO**.

If you have any other questions, please contact Victoria Brooks on [victoria.brooks](#) **GRO** or **GRO** **GRO**. Alternatively, please contact Dave Panaech on [dave.panaech](#) **GRO** or **GRO** **GRO**.

We thank you in advance on behalf of Post Office for your assistance and support.

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Womble Bond Dickinson (UK) LLP

10 July 2018