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By email

Date
27 December 2023

Dear Solicitor to the Inquiry

Post Office Horizon IT Inquiry – Disclosure by POL: Phase 4 hearings and witnesses

We enclose a note prepared by Peters & Peters Solicitors LLP. This note refers to the Inquiry's letter dated 14 December 2023 in relation to the Phase 4 hearings and witnesses and relates to those January witnesses dealing with prosecutions in the devolved jurisdictions and criminal case studies. POL will update the Inquiry in respect of the other January witnesses to the extent that it becomes necessary to do so.

Yours faithfully

Herbert Smith Freehills LLP

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Post Office Horizon IT Inquiry

Note provided by Peters & Peters regarding disclosure by POL in relation to Phase 4 hearings and witnesses

1. In its letter to HSF dated 14 December 2023 (the 'Letter'), the Inquiry sought prompt disclosure of any further documents in respect of Rule 9 requests, Section 21 Notices or other documents of interest in order to ensure that the Inquiry's Phase 4 hearings can remain listed as scheduled, if at all possible.
2. The Inquiry therefore sought disclosure of any additional documents by the following deadlines:
 - a. Any additional documents said to be in relation to Stephen Bradshaw by 4pm on 20 December 2023; and
 - b. For all other persons listed in Annex 1 to the Letter, no later than 4pm on 10 January 2024.
3. This note is intended to provide an update on POL's progress with respect to meeting the deadlines set out in the Inquiry's Letter.

Stephen Bradshaw

4. On 19 December 2023, HSF wrote to the Inquiry enclosing a note prepared by Peters & Peters explaining that the current exercise of reviewing and producing material relating to Stephen Bradshaw had finished. However, there are two further matters relating to Stephen Bradshaw's data that POL wishes to bring to the Inquiry's attention.

Audio Tape Transcripts

5. Peters & Peters understands that POL's CIU team has identified a number of audio tape recordings of interviews conducted by POL in connection with sub-postmaster investigations. We understand that these audio tapes have been catalogued as part of POL's reindexing exercise. Peters & Peters only became aware of these additional tape recordings following receipt of the results of that reindexing exercise. In light of the deadline to provide the Inquiry with all relevant material in connection with Stephen Bradshaw, Peters & Peters has undertaken an urgent review of the reindexed spreadsheets of the audio tapes to identify any cases in which Stephen Bradshaw was the interviewing officer. Peters & Peters has identified three working tapes that have not previously been provided to the Inquiry relating to Stephen Bradshaw's interview of "Joan Francis Bailey", which we assume is the case of Joan Bailey. POL is therefore urgently working to locate these tapes and provide them to Peters & Peters in order that they can be digitised and transcribed as soon as possible. The transcripts will be disclosed in response to R9(14) Q42. POL will update the Inquiry as to the likely timing of that disclosure when it can. POL notes, however, that the Inquiry already has Record of Taped Interview summaries in relation to Joan Bailey, so POL expects that the broad substance of what is contained in the transcripts of these three new audio tapes is likely already to be in the Inquiry's possession.
6. Further work is also ongoing to establish whether any other material from these newly indexed audio tapes falls to be disclosed to the Inquiry. POL will provide a further update on that work in due course.

COPFS Disclosure Exercise

7. Material relating to Stephen Bradshaw is also being considered by Peters & Peters for a Crown Office and Procurator Fiscal Service ("COPFS") disclosure exercise owing to his involvement in one of the Scottish cases (though not a case POL understands to be under consideration by the Inquiry, per the Inquiry's email of 19 December 2023). Since HSF's 19 December 2023 letter to the Inquiry, the Peters & Peters COPFS team has begun some additional checks to ensure that all Stephen Bradshaw material has been caught. From the investigations into the MS Exchange 365 issues, potential additional email addresses and display names have been identified (for example, a secure CJSM email address) and checks are underway to ensure that material has already been captured.

Irrelevant to disclosure hearing held 12 January 2024

Peters & Peters Solicitors LLP

27 December 2023