

## Message

**From:** Tim Parker [Tim.Parker@GRO]  
on behalf of Tim Parker <Tim.Parker@GRO> [Tim.Parker@GRO]  
**Sent:** 09/03/2020 16:08:45  
**To:** Ben Foat [Ben.Foat@GRO]  
**CC:** Diane Blanchard [diane.blanchard@GRO]; Richard Taylor [richard.taylor@GRO]; Nick Read [Nick.Read1@GRO]  
**Subject:** Re: GLO - Historic Management of GLO - Q&As - Response to Chairman - Legally Privileged and Strictly Confidential

Hi Ben,

Any thanks for this: quite a lot to chew over...

Best

Tim

Tim Parker

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**From:** Ben Foat <Ben.Foat@GRO>  
**Sent:** Monday, March 9, 2020 2:30:06 PM  
**To:** Tim Parker <Tim.Parker@GRO>  
**Cc:** Diane Blanchard <diane.blanchard@GRO>; Richard Taylor <richard.taylor@GRO>; Nick Read <Nick.Read1@GRO>  
**Subject:** GLO - Historic Management of GLO - Q&As - Response to Chairman - Legally Privileged and Strictly Confidential

Hi Tim

At the outset, please accept my apologies for not keeping you better updated on the progress that we have made on the Historic GLO Management workstream.

Below sets out the preliminary answers that we have to the questions that have been raised. I have also raised a number of question around key milestones, what happened, who was involved and what were the decisions/findings or criticisms etc which I attach the answers. See the attached document marked "GC Questions re Historic Management of GLO". My original executive summary is also set out at the end of the email chain for your convenience. You will see from below and the attached documentation that an extensive amount of work has been undertaken but further work in required from the external lawyers (which have been chased up)

the preliminary answers are as follows:

1) **The actual circumstances of the 150 or so cases that entered the Mediation scheme – what was the outcome of the POIRs and CRRs of Second Sight? How many cases were settled, and how many judged to be not suitable for mediation?**

- Attached is a table detailing the outcome for each of the 150 applications made to the Scheme. I have also attached a spread sheet which was the MI for the Scheme (password: Hendy01) – columns AB to AK cover POIRs and CRRs. The combination of the table and the spreadsheet provides the detail of circumstances for each case.

2) **The background to the fall-out with the JFSA during 2014, what were the precise problems with Second Sight**

Background to fall-out with JFSA in 2014

- Length of time it was taking for cases to progress through the scheme (see letter from PV to LA dated 14.05.14, 6.9 in chronology).
- AB raising concerns with Jenny Willot MP rather than the working Group (see letter from PV to LA dated 14.05.14, 6.9 in chronology).
- AB raising concerns regarding the working group meetings being attended by too many lawyers from POL (see letter from JA to PV dated 17.09.14, 6.21 in chronology).
- That the working groups were not routinely recommending all cases (including criminal cases) as being suitable for mediation (see letter from AB to Sir Anthony Hooper dated 10.11.14, 6.27 in chronology and letter from PV to LA dated 28.11.14, 6.31 in chronology).
- That prosecution files were not being shared with SS (see letter from AB to Sir Anthony Hooper dated 10.11.14, 6.27 in chronology)
- An assertion that Post Office was no longer interested in “seeking the truth” (see letter from AB to Sir Anthony Hooper dated 10.11.14, 6.27 in chronology) and instead adopting a legalistic approach.

Precise problems with Second Sight

- Rate of delivery, cost, work product (see CA speaking notes for meeting with SS on 30.09.14, 6.24 in chronology).
- Commentary on matters beyond the scope of the Scheme and/or SS’s professional expertise (see letter from PV to Jo Swinson MP dated 14.10.14, 6.26 in chronology and letter from JM to SS dated 24 February 2015 and 7.8 in chronology).

More generically:

- **Criticism in light of Post Office's decision not to engage in mediation in cases involving criminal convictions:** Post Office adopted this approach following very strong legal advice that including criminal conviction cases would carry unacceptable risks for Post Office as the prosecuting authority. Adopting this approach attracted criticism from JFSA.
- **Delays:** Post Office acknowledged that cases at every stage of the Scheme took longer than the Working Group would have wanted.
- **Second Sight recommended the vast majority of cases for mediation:** Second Sight did so regardless of the evidence available, which in some cases included guilty pleas and convictions for false accounting and/or theft. Post Office assumes that Second Sight did so as a result of pressure from JFSA and MPs. This meant that Post Office had to challenge a greater number of recommendations from Second Sight.
- **JFSA became frustrated:** JFSA's expectations appeared to be for Post Office to, in all cases, mediate, accept responsibility and pay compensation. JFSA refused to discuss the merits of cases with Post Office where

Second Sight had recommended cases be referred to mediation, on the basis that JFSA felt that the Second Sight recommendation should be determinative. JFSA even left the room during a Working Group meeting, meaning the Chair didn't have the benefit of JFSA's counter-arguments/ vote on individual cases.

- **Expectations:** CEDR confirmed that the applicants/ Subpostmasters felt as though they were in a compensation scheme - i.e. a no fault scheme, whereas Post Office took a legalistic stances, as they were entitled to.
- **Timing of complaints:** CEDR confirmed on at least 2 occasions applicants/ Subpostmasters raised claims that had not been disclosed before mediation.
- **Lack of confidentiality:** All parties agreed that the mediations and Working group business were meant to be conducted in the strictest confidence. Post Office felt that there was clear evidence that (i) JFSA and applicants/ Subpostmasters discussed their cases; and (ii) the Working Group discussed cases with third parties.

### 3) The basis of the decision taken to mediate all Scheme cases in March 2015, to close the Working Group, and to discontinue Second Sight?

See speaking notes for PV at a meeting with SAH on 09.03.15, 7.9 of chronology

- Against a backdrop of being criticised by the JFSA, in the media and parliament for the length of time it was taking for the Scheme to progress and as Post Office had completed its investigations into each of the cases, it was decided that save for those cases subject to a prior "court ruling" it would offer mediation to all cases.
- As such there was no substantive role left for the working group to play as:
  - POL had delivered all reports and all with applicants
  - Second Sight had a delivery date for all their CRRs
  - The mediation process was agreed with CEDR and happening
  - Post Office would offer mediation in all cases except those previously determined in court.
- Further, the working group was becoming increasingly dysfunctional with the JFSA refusing to take part when Post Office viewed a case as not being suitable for mediation.

See speaking notes for JM at a meeting with SS on 10.03.15, 7.9 of chronology

- Second Sight original engagement was to provide services to support the working group. As the working group's role had come to an end. As a result Post Office gave notice to SS in respect of their original engagement.
- However, Post Office re-engaged SS in order that they could complete their review of each case. SS's engagement with Post Office ended on 6 July 2015, following the completion of its final CRR.

### 4) Detailing of the action taken in relation to the criticisms in the Second Sight Part 2 report

Any proposals to respond to the criticisms included in SS's Part Two report would (I think) have been taken forward by Angela as part of her Branch Support Programme. Angela is trying to obtain a report which details what was delivered vs the original scope. This has been requested as part of a different matter. Angela is not aware of Project Brisbane.

5) The extent of the implementation of the recommendations of the independent review commissioned from Jonathan Swift and reporting in January 2016 before the GLO commenced.

JSQC who was supported by Christopher Knight made 8 recommendations

- I. Legal advice be sought from counsel as to whether the decision to charge an SPMR with theft and false accounting could undermine the safety of any conviction for false accounting where (a) the conviction was on the basis of a guilty plea, following which and/or in return for which the theft charge was dropped, and (b) there had not been a sufficient evidential basis to bring the theft charge.

Completed, please see BAQC's report dated 26 July 2016 (attached)

- II. If such a conviction could be undermined in those circumstances, that counsel review the prosecution file in such cases to establish whether, applying the facts and law applicable at the relevant time, there was a sufficient evidential basis to conclude that a conviction for theft was a realistic prospect such that the charge was properly brought.

Completed, please see BAQC's report dated 26 July 2016 (attached)

- III. POL consider instructing a suitably qualified party to carry out an analysis of the relevant transaction logs for branches within the Scheme to confirm, insofar as possible, whether any bugs in the Horizon system are revealed by the dataset which caused discrepancies in the accounting position of any of those branches.

Partially completed. Post Office took this recommendation forward as part of the litigation. The product of which was the Bramble report (attached)

- IV. POL instruct a suitably qualified party to carry out a full review of the use of Balancing Transactions throughout the lifetime of the Horizon system, insofar as possible, to independently confirm from Horizon system records the number and circumstances of their use.

Partially completed. Post Office took this recommendation forward as part of the litigation. The product of which was the Bramble report (attached)

- V. POL instruct a suitably qualified party to carry out a full review of the controls over and use of the capability of authorised Fujitsu personnel to create, amend or delete baskets within the sealed audit store throughout the lifetime of the Horizon system, insofar as possible.

Partially completed. Post Office took this recommendation forward as part of the litigation. The product of which was the Bramble report (attached)

- VI. POL seek specialist legal advice from external counsel as to whether the Deloitte reports, or the information within them concerning Balancing Transactions and Fujitsu's ability to delete and amend data in the audit store, should be disclosed to defendants of criminal prosecutions brought by POL. This advice should also address whether disclosure should be made, if it has not been, to the CCRC.

TBC – BAQC advised that until the Deloitte report had determined whether there was any evidence of actual problems with balancing transactions or sealed audits, he was unable to advise on whether further disclosure was required. I will need to confirm what happened once the Deloitte Report was completed.

- VII. POL cross-reference specific complaints about misleading advice from NBSC call-handlers with the possible employees who provided that advice and consider their personnel files, where available, for evidence as to the likelihood that the complaint may be well-founded.



Completed. Please see investigations report dated 4 May 2016 prepared by WBD ("NBSC Investigations Report...")

- VIII. POL commission forensic accountants to review the unmatched balances on POL's general suspense account to explain the relationship (or lack thereof) with branch discrepancies and the extent to which those balances can be attributed to and repaid to specific branches.

Not completed. Taken forward as part of the litigation but work paused once settlement was reached. We were working with Deloitte to understand whether, for the periods of time branches were operated by the claimants, whether any monies had actually been taken to suspense accounts and then to profit by Post Office – which traced back to these branches. We are now working with Deloitte to assess whether Post Office current operation of suspense accounts is appropriate.

6) **Status of the Cartwright King review of disclosure relating to the cases involving convictions**

Cartwright King are only presently involved purely for the purposes of corporate memory. They are not the criminal legal team conducting the review.

- 7) **A review of the legal advice leading to the decision to defend against the GLO claimants, rather than settlement out of court.**

Following up with external lawyers.

- 8) **In the trial certain terms of the contract were admitted: it would be useful to know what implications, if any, this may have had for the claimants**

Following up with external lawyers.

- 9) **Review of the available information on the reliability of the two early Horizon versions at the time the decision was taken to go to trial with the group litigants.**

This would have been the Project Bramble Report by Deloitte (attached).

I have also arranged a set of key primary source documents to be bound which will be available to you on Tuesday so can refer to the those primary sources/documentation. In my QA document, electronic links will allow him to go to primary sources.

Happy to discuss.

Kind regards  
Ben



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Mobile : **GRO**

**From:** Ben Foat  
**Sent:** 24 January 2020 08:21

**To:** Tim Parker

**Cc:** Nick Read; Avene Regan; Diane Blanchard

**Subject:** GLO - Previous Investigations - Legally Privileged and Highly Confidential - Do Not Forward

Dear Tim,

As requested:

- please find attached the please find attached a chronology of events, meetings, reports etc from October 2008 until the Letter of Claim was received in August 2016. Ticks indicate where I have the supporting documentation referred to within the table. All supporting documentations (where it is held) is stored on the Legal Drive.
- Below is a summary of the previous milestones / investigations leading up to proceedings being instituted.

### **Summary of Previous Investigations into the Issues Raised by the Claimants and Others**

1. The dispute between Post Office and a number of mainly former postmasters has been ongoing for a number of years, with allegations were first made about the reliability of the Horizon computer system in 2009. What follows is a summary analysis of the criticisms directed at Post Office, by those who have been involved or followed this dispute, prior to the GLO. A summary of the case involving suicide, which was the focus of an article in Independent on 20 December 2019, is also provided.
2. Post office has either established or been party to three material 'investigations':
  - a. The Complaint Review Mediation Scheme which, broadly speaking, ran from August 2013 – February 2016 and attracted significant political and media attention including:
    - i. Westminster Hall Debate: Post Office Mediation Scheme - 17/12/2014
    - ii. Business, Innovation and Skills Committee Select Committee: The Post Office Mediation Scheme and Horizon IT System - 03/02/2015
    - iii. House of Commons Debate: Post Office Horizon System - 29/06/2015
    - iv. BBC Panorama Programme: Trouble at the Post Office - 17/08/2015
  - b. The Chairman's review into the adequacy of the Scheme and the investigations performed, which ran from September 2015 – June 2016
  - c. The Group Litigation Order, which formalised in April 2016 and settled on 10 December 2019

### **The Complaint Review & Mediation Scheme**

3. Post Office was approached in 2012 by a small number of largely former postmasters and a group of MPs (led by **James Arbuthnot**) concerning allegations which included claims that faults in the Horizon computer system had caused branch losses.
4. In response, Post Office appointed independent forensic accountants **Second Sight** to perform a 'top down' examination of Horizon and in the Autumn of 2013 it established the '**Complaint Review and Mediation scheme**
5. The Scheme was established to consider complaints about Horizon and associated issues and to determine if there were, as initially alleged, faults with the computer system that caused cash to go missing from a small number of Post Office branches - not wider matters about the Post Office's business model, including contracts and its approach to prosecutions. It was set up in consultation with **MPs**, the **Justice for Subpostmasters Alliance** (JFSA) and Second Sight and overseen by a working group, chaired by a former Court of Appeal Judge, **Sir Anthony Hooper**. Mediations were overseen by the Centre of Effective Dispute Resolution (**CEDR**).

6. As the Scheme progressed, the level of criticism directed at Post Office intensified. This was because it became clear to campaigners that the Scheme was not set up to, nor was it able to undo criminal convictions or pay significant amounts in compensation without reference to underlying facts.

#### James Arbuthnot

7. Then MP, now Lord Arbuthnot has been the most determined champion of those who believe a number of postmasters have wrongly been held responsible and, in some cases, unfairly prosecuted for losses incurred in their branches. He was a pivotal figure during the Scheme and has made clear his intention to continue to play a central part in it from his new position in the House of Lords.
8. As a prominent MP, he called a **Westminster Hall Debate** on 17 December 2014, precipitated a short, stand-alone, inquiry by **the BIS Select Committee** on 3 February 2015, and raised the issue at Prime Ministers' Questions; the cover of Parliamentary Privilege allowing him free-reign to make damaging claims about the Post Office. We are also aware that he, together with a Labour colleague, went to see the Criminal Cases Review Commission (CCRC) in December 2014 to lobby them to investigate the Post Office. His complaints have been wide ranging with assertions including that:
  - a. Post Office has spent £ millions covering up miscarriages of justice.
  - b. Post Office unfairly narrowed the scope of the Scheme to exclude, for instance, issues relating to the 'fairness' of the postmaster contract or prosecutions practice.
  - c. Post Office fails properly to investigate the cause of losses in branch and leaves postmasters with 'no option' but to commit the criminal offence of false accounting.
  - d. Post Office has withheld documentation from Second Sight, misrepresented their findings and 'gagged' them.
  - e. Post Office has adopted an overly legalistic approach to these issues, senior executives have broken their word, frustrated the process and should resign.

#### Second Sight

9. At various times during the process, Post Office raised concerns with Second Sight regarding slow delivery, quality/rigour of output, and their repeated commentary on matters outside of the scope of their terms of engagement, the Scheme and their expertise as a firm of forensic accountants. Nonetheless, it is the case that up until the current litigation Second Sight had had the greatest and most in-depth exposure to the issues than anyone outside of the Post Office.
10. Although Second Sight made some key criticisms of Post Office, both in its reports and when commenting publicly. These included assertions that:
  - a. Post Office suffers from "*institutional blindness*" and has failed "*to investigate properly and in detail cases where IT problems occurred*".
  - b. Post office had adopted an overly legalistic approach and obstructed their investigations in a number of areas, withholding documentation - allegedly breaking a commitment to provide whatever information they felt they needed, including privileged material.
  - c. Post Office fails to properly investigate the cause of losses in branch and leaves postmasters with 'no option' but to commit the criminal offence of false accounting.
  - d. Their findings were misrepresented at Parliamentary debates and Post Office had 'gagged' them.
  - e. Post Office unfairly narrowed the scope of their investigations to exclude, for instance, issues relating to the 'fairness' of the SPMR contract and prosecutions practice. Their reports still however included the following statements:
    - i. "*The contract between Post Office and its Subpostmasters lies at the heart of many of the issues that Subpostmasters wish to resolve by way of mediation*".

- ii. *"The contract allocates several financial and other risks to Subpostmasters who may not have understood or appreciated those risks ..."*

11. A further allegation made by Second Sight was that:

- Post Office operated one or more "suspense accounts" in which it held unattributed surpluses including those generated from branch accounts;
- After a period of 3 years, such unattributed surpluses were credited to Post Office's profits; and
- Post Office therefore stood to benefit and/or did benefit from apparent shortfalls wrongly attributed to the Claimants, which did not represent real losses to Post Office (and were actually taken to POL's suspense accounts).

12. Suspense accounts are accounting tools for temporarily holding differences in payments moving between Post Office and its clients, where the client and Post Office's view of what is payable or receivable differ. Differences are investigated but in some cases neither Post Office, the client, nor the branch are able to determine the identity of the customer who performed the transaction in question or the specifics of the transaction. For example, Post office may not be able to determine the details of the bank account to be credited. In such situations, and following enquiries with branches, unresolved differences are moved to Post office Suspense Accounts. Such discrepancies are held in its suspense accounts to give time for customers and clients to put forward more information to explain what has happened. If no new information is provided, then after 3 years values held in suspense are released to Post Office's P&L.

13. Second Sight requested details of the credits released from Post Office's suspense accounts to profit for the period 2008 to 2013. As there is a 3 year retention period – no amounts at that time had been released for the years 12/13 and 13/14. The total gross credits released from suspense to profit from 2007/8 onwards was as follows:

Years released to profit	Value
2010/11	£612,000
2011/12	£207,000
2012/13	£234,000
2013/14	£104,000
2014/15 (YTD at the point provided)	£8,000

14. These released amounts should be considered within the overall context of Post Office performing around 2.5 billion transactions per annum, with a combined value in the order of £60bn. The amount of unresolved credits that end up in Post Office's P&L is therefore less than 0.001% of all transactions (by value) undertaken by branches.

15. The Second Sight report cites "unreconciled" balances for the 2014 financial year of c£96 million in respect of Bank of Ireland ATMs and c£66 million in respect of Santander. Second Sight misunderstood the information provided by Post Office. The balances of £96m and £66m were taken from routine trading balances yet to be settled with other organisations at a particular month end. In other words, they represented amounts due to other parties, not amounts that are unreconciled and which may be due to postmasters.

#### **Sir Anthony Hooper**

16. Sir Anthony Hooper (SAH), a former Court of Appeal Judge was appointed as the Independent Chair of the Working Group, which oversaw the Scheme. Although he did not necessarily agree with Post Office's view that some specific cases in the Scheme were not suitable for mediation, we are not aware of SAH levelling any criticisms, certainly public criticisms, at Post Office processes, the training and support it offers to Postmasters or the contract in place between Post office and postmasters.

17. The only public criticism that SAH did make, and which was directed at all parties involved in the Scheme was in respect of the length of time it took for cases to progress through the Scheme. This was included in a letter to Jo



Swinson MP, the then Parliamentary Under-Secretary (Department for BIS) (Employment Relations, Consumer and Postal Affairs), ahead of the 2014 Westminster Hall Debate. In this letter SAH wrote:

*"The progress of cases at every stage of the Scheme has taken longer than the Working Group would have wanted. This includes the submission of case questionnaires by the applicants (or their advisors), Post Office's investigations, Second Sight's reviews and applicant responses to Second Sight draft case reviews ...".*

**Westminster Hall Debate: Post Office Mediation Scheme - 17/12/2014**

A number of statements, allegations and questions of a more general nature were also raised in the debate including:

- i. The Scheme's scope and Post Office's approach to it. The Scheme was described as a "sham" and Post Office was accused of bad faith and of undermining its own Scheme.
- ii. That Post Office's approach to the Working Group, and to the mediations itself, was secretive in nature and that Post Office was seeking to undermine the Scheme it created.
- iii. Post Office was using the Scheme and the Working Group to exclude some 90% of cases from mediation.
- iv. The accusation that Post Office was seeking to exclude all cases involving criminal convictions.
- v. That postmasters' accounts can be amended remotely, in Horizon, without their or their staff's knowledge.
- vi. that the training, help and support provided to postmasters was inadequate.

**BIS Select Committee: The Post Office Mediation Scheme and Horizon IT System - 03/02/2015 & BBC Panorama Programme: Trouble at the Post Office - 17/08/2015**

18. Similar Complaints and assertions have been made at subsequent parliamentary debates and, notably on a BBC Panorama broadcast 2015, during which it was alleged by contributors such as Ian Henderson of Second Sight and Richard Roll (a former Fujitsu employee), both of whom are witnesses at the Horizon Issues Trial, that
  - a. There may have been miscarriages of justice as Post Office abuses its power as prosecutor and brings charges of theft against postmasters as a ruse to secure guilty pleas for false accounting.
  - b. Account discrepancies could be caused by faults in the Horizon system.
  - c. Post Office and or Fujitsu have the ability to access branch accounts remotely, without the Postmaster's knowledge or approval.
  - d. Post Office is a 'bullying organisation' and that it that it has put pressure on defendants to plead guilty to criminal offences.
  - e. There are deficiencies in the support available to postmasters enabling them to investigate the cause of errors at the time of the error occurring.
  - f. The terms of the Postmaster contract are unfair. On Panorama Ian Henderson stated that it *"needs a fundamental overhaul to reflect far better an appropriate relationship. It strikes us that it is written very much in words reflecting a master/servant relationship that perhaps was appropriate 70 years ago but should not be part of a modern contract"*.

**House of Commons Debate: Post Office Horizon System - 29/06/2015**

19. Subsequent to a debate in the House of Commons in on 29 June 2015, Paula Vennells was invited by the then Minister of State (Department for BEIS) Baroness Neville Rolfe to attend a meeting with MPs to discuss the concerns that had been expressed by MPs such as Andrew Bridgen and Kevan Jones. These included that:
  - a. Post Office failed to demonstrate any appetite to deal with issues arising from the Horizon system in a fair and transparent way.
  - b. Criminal charges had been pressed against postmasters unjustly when the fault lay with Post Office.

- c. Post Office had excluded from the scope of Second Sight's work the Postmaster contract and the apparent absence or the ignorance on the part of the sub-postmaster of the contract they were under.
- d. That the audits were not fit for purpose and postmasters accounts could be altered remotely.
- e. Post Office has abused its privileged position and sought to cover up its failings by way of a wholly non-transparent approach to the mediation process.
- f. The cases with the biggest claims had been excluded from mediation.

### The Chairman's Review

NOTE THIS WORK IS PRIVILEGED AND SHOULD NOT BE THE SUBJECT OF EMAIL OR OTHER WRITTEN COMMUNICATION UNLESS ADDRESSED TO THE GENERAL COUNSEL.

20. Subsequent to a meeting between MPs and Post Office, which was requested by BNR on the back of the Panorama programme and HoC Debate, BNR wrote to the Chairman, Tim Parker, asking that *"on assuming your role as Chair, you give this matter your earliest attention and, if you determine that any further action is necessary, will take steps to ensure that happens"*.

21. Aided by Jonathan Swift QC and Christopher Knight, both of 11 Kings Bench Walk Chambers, the Chairman agreed :

*"To review the Post Office's handling of the complaints made by sub-postmasters regarding the alleged flaws in its Horizon electronic point of sale and branch accounting system, and determine whether the processes designed and implemented by Post Office Limited to understand, investigate and resolve those complaints were reasonable and appropriate"*, focusing on:

- a. Criminal prosecutions
- b. The Horizon system (the software)
- c. The support provided to Sub-postmasters through training and helplines; and
- d. The investigations in circumstances of specific cases where a complaint had been raised

Having been given unrestricted access to documentation and personnel, the principal findings as at March 2016, before the Review came to a premature end in June 2016, owing to the litigation having commenced, were that:

- a. Criminal prosecutions were a matter for the Court of Appeal or CCRC, though Post Office had adopted a proper approach to disclosure, such that it satisfies its duty of disclosure as prosecutor, and was co-operating fully with the CCRC.
- b. No evidence had emerged to suggest a technical fault in Horizon resulted in a postmaster wrongly being held responsible for a loss.
- c. In terms of the allegation that that postmasters were provided with insufficient training to operate the system effectively and or did not receive an appropriate level of support while in post, a number of factors including the lack of specificity in the allegations and a lack of available training records made it difficult to determine the merits of these complaints, with the review concluding that these issues had been addressed as comprehensively as is reasonably possible by both Post Office and Second Sight through their investigations as part of the Scheme.
- d. The investigations were detailed and thorough and left no more than very limited gaps which might now reasonably be filled by further work.

22. Though the review effectively ended upon receipt of the letter of claim, further work was taken forward as part of the litigation.

I have asked the team to work through any minutes or previous board resolutions to ascertain any further management decisions during this time.

We have a central repository of documents so if you require any specific document then please do let me know and I can arrange for it to be provided to you.

Happy to discuss any of the above.

Kind regards  
Ben



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