

**POSTMASTER GROUP ACTION  
CONFIDENTIAL AND LEGALLY PRIVILEGED**

**Steering Group Meeting: 8 August 2017**

**DECISION: SHOULD POST OFFICE PRESERVE MORE DOCUMENTS?**

**1. BACKGROUND**

- 1.1 Post Office has a Court duty to take reasonable steps to preserve any documents that may need to be later disclosed in the litigation. At the Steering Group meeting on 22 August 2016, Post Office decided to take a proportionate approach to this duty. The decision paper from this meeting is at Schedule 1.
- 1.2 It was decided that a list of key individuals across the business who might hold relevant documents would be produced, and then establish what documents they held and how. Forensic copies would be taken of relevant electronic documents and scanned copies taken of hard copy files. Although not all relevant documents would be preserved because of the targeted nature of the exercise, it would demonstrate a genuine attempt to preserve documents.
- 1.3 It was recognised that that the preservation exercise would need to be refreshed if/when further Claimants issued a claim against Post Office (we now have 324 new Claimants) and as the litigation progressed.

**2. DOCUMENTS ALREADY PRESERVED**

- 2.1 The preservation exercise had a dual purpose: it was to preserve documents and also to provide information to support the Case Review exercise. Within the original 198 Claimants, 88 were part of the mediation scheme and so the Case Review was limited to the other 110 cases.
- 2.2 This has led to a tiered capture of documents:
  - 2.2.1 Litigation hold notices have been sent to key parts of the business. This covers a wide range of documents but only provides a low level of assurance that documents will not be destroyed.
  - 2.2.2 For some categories of documents, we have extracted all Post Office data in relation to all subpostmasters (not just Claimants).
  - 2.2.3 For some categories of documents, we have only captured information relating to the 198 original cases.
  - 2.2.4 For some categories of documents, we have only captured information relating to the 110 cases subject to the Case Review.
- 2.3 In general, we have narrowed the capture of documents when dealing with paper records as these require significantly more time and cost to locate and scan into a data room.
- 2.4 The preserved documents are being hosted in a data room that currently holds 599,004 documents. Further information on the documents that have been preserved already can be found in Schedules 2 and 3.
- 2.5 The focus of work so far has been around preserving documents relevant to individual Claimants. We have not yet preserved documents relevant to generic issues. For example, we have captured the debt team files on individual Claimants, but we have not scoped and preserved general documents and policies about debt collection practices. This is because "generic" documents are much more difficult to identify, locate and retrieve in a cost effective way.

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**3. FURTHER PRESERVATION NEEDED**

- 3.1 In light of the new 324 Claimants and now having served Post Office's Defence, the document preservation exercise could be extended to new areas, namely:
- 3.1.1 Documents relating to the new 324 Claimants.
  - 3.1.2 Some areas of generic documentation.
- 3.2 The enclosed Schedule 4 lists areas for further preservation work.

**4. RECOMMENDATION**

- 4.1 We recommend preserving Tranches 1 and 2 in Schedule 4.
- 4.1.1 As a minimum, Post Office should extend the document preservation exercise that has already been carried out to the 324 new Claimants.
  - 4.1.2 We would strongly recommend preserving the entirety of POL SAP when it is taken offline later this year. Currently, only certain reports have been run from it and it contains a vast amount of potentially key financial information on the Claimants and their branches.
  - 4.1.3 We would also recommend beginning to capture key generic documents that are likely to be sought in disclosure by the Claimants, to the extent that this could be done cost-effectively.
- 4.2 BD's work in delivering the above will be covered by its fixed fee until 19 October 2017, however we anticipate this work will continue after that date. The majority of the costs of this exercise will however fall on Post Office:
- 4.2.1 Capturing paper records for 324 new Claimants will require considering resourcing from Post Office to locate, organise and send the files to Millnet for scanning. Millnet will also charge for scanning and coding documents into the data room. We anticipate this will cost around £100 - £300 per Claimant based on historic figures.
  - 4.2.2 Capturing further electronic files will incur forensic costs from CA and Millnet. These costs very much depend on the number of documents captured. We therefore recommend that Post Office sets a budget for this exercise and we will then look to capture a corresponding amount of data to fit within this budget.
  - 4.2.3 Uploading and hosting more documents in the data room will increase the hosting costs (which currently stand at £5,525 per month). It is difficult to assess the likely forward cost as it depends on the number of documents but this could be between £8,000 - £10,000 per month.
- 4.3 In the Decision Paper of 22 August 2016, we set out the advantages of preserving documents. We continue to believe that these advantages justify the above costs.
- 4.4 We also note that since then Mr Justice Fraser has been appointed as the managing judge for the Group Litigation. He has recently given a judgment in another case criticising a party for not preserving evidence. He is therefore a judge who clearly takes an interest in these types of issues.

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**SCHEDULE 1: PLSG PAPER FROM 22 AUGUST 2016****SUMMARY:**Background

Post Office has a Court duty to take reasonable steps to preserve any documents that may need to be later disclosed in the litigation. "Document" means practically anything holding information, including electronic documents like emails.

What will satisfy the duty to preserve documents will depend upon the likelihood of documents being lost, how they may be lost and the consequence on the litigation of losing a document. For example, for documents tangentially related to one minor sub issue in the litigation, only minimal action will be required. However, where the documents are required to determine a key liability issue, it will likely be necessary to have the documents forensically imaged to avoid them being lost.

Failing to adequately preserve documents could result in sanctions against Post Office – including cost penalties, striking out of parts of Post Office's case and / or the drawing of adverse inferences by a Judge (ie. by making assumptions against Post Office in the absence of documentary evidence to disprove those assumptions).

Steps to date

At the outset of the Group Action, Post Office Legal sent "litigation hold notices" to key parts of the business asking them not to destroy relevant documents.

Since then BD has liaised with various teams at Post Office regarding potentially relevant documents and document sources. Through these investigations, we have developed an understanding of document storage, retention and deletion across the business, as well as better understanding the current IT projects that may impact on document preservation. Please see the Document Locations Table attached to this paper for details of the locations in which documents are held.

These investigations have led to the development of the "Preservation Options" attached to this paper.

Options

Given the complexity of Post Office's IT systems and the different practices operated in different business units, we do not believe that simply sending general litigation hold notices (Option 1) or even more stringent, targeted litigation hold notices (Option 2) will be sufficient.

Conversely, the work to date has revealed that the indicative costs for forensically imaging all Post Office's systems (Option 5) to be in the hundreds of thousands of pounds (if not more) and this option is not viable.

Our view is that some form of limited forensic imaging of information is required – either of documents held by key custodians (Option 3) or by undertaking a deeper review to identify more relevant locations of documents (Option 4).

**ADVANTAGES:**

- The nature of the claims in this matter, particularly the fraud and concealment issues, means that preservation is a relatively high risk issue in this case. Losing key documents where there are allegations of concealment would weigh against Post Office in Court and would be presented by Freeths as yet another form of concealment. This militates towards Post Office taking a more stringent approach to document preservation.
- Doing nothing risks falling foul of the Court duty to preserve relevant documents. Aside from the legal consequences, this would present very badly through a public / media lens.

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- By taking steps now, we can then put Freeths on notice of what Post Office is doing and seek their early engagement on this issue. This will make it harder for them to complain later about missing documents.

**DISADVANTAGES:**

- Preserving and disclosing documents is one of the most expensive parts of the litigation process. All the defensible preservation options come at a material cost to Post Office.
- No matter what steps are taken, many documents will have been lost already due to the passage of time. Some amount of criticism about missing documents is inevitable and further work now cannot offer complete protection for Post Office.

**RECOMMENDATION:**

Post Office should commission the further scoping work described in Option 4 below. This would allow a more accurate cost estimate to be drawn up. A more informed decision can then be taken to proceed with either Option 3 or Option 4 (or otherwise).

In parallel, BD should write to Freeths to draw out their view on what would be a proportionate way to proceed.



*Bond Dickinson***PRESERVATION OPTIONS****[ANNEXED TO PLSG PAPER ON 22 AUGUST 2016]**

| Option | Summary                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | Pros/Cons                                                                                                                                                                                                                                                                                                                                                                                                                          | Defensibility                                                                     | Cost range (ex VAT) |
|--------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------|---------------------|
| 1      | <b>Take no more action</b><br>Rely on the hold notices already sent to the business and undertake a further review once Post Office has received the Particulars of Claim.                                                                                                                                                                                                                                                                                                                                    | <ul style="list-style-type: none"> <li>✗ High risk that documents will not be retained.</li> <li>✗ High risk of criticism as there are additional steps that POL could reasonably take at this stage.</li> <li>✓ Zero cost.</li> </ul>                                                                                                                                                                                             | Not defensible                                                                    | Nil Cost            |
| 2      | <b>Send improved litigation hold notices</b><br>Based on investigations to date, draw up a list of key individuals within Post Office and then send specific hold notices to those specific individuals.<br>With respect to external documents within POL's control, identify the key external business partners and stakeholders (eg. Fujitsu) and send bespoke hold notices to them.                                                                                                                        | <ul style="list-style-type: none"> <li>✗ It is unlikely that all relevant individuals/teams would be fully identified based on current information.</li> <li>✗ In light of the ongoing IT projects / migrations this is still relatively high risk.</li> <li>✗ Unlikely the preservation would be effectively implemented by all individuals.</li> <li>✓ Low cost/impact.</li> </ul>                                               | Likely not defensible                                                             | Less than £2,500    |
| 3      | <b>Forensically copy documents from key individuals</b><br>Based on investigations to date, draw up a list of key individuals within Post Office and then take forensic mirror images of any electronic documents stored in their email accounts and personal files.<br>With respect to external documents within Post Office's control, locate key external business partners and stakeholders (eg. Fujitsu) and send bespoke hold notices to them.<br>With respect to hard copy documents, obtain and store | <ul style="list-style-type: none"> <li>✗ Would likely require the assistance (and therefore cost) of a third party e-Disclosure provider in order to take forensically sound images of data.</li> <li>✗ Would not secure documents held in shared workspaces (eg Sharepoint, etc.)</li> <li>✗ Would likely require updating upon receipt of the Particulars of Claim.</li> <li>✓ Limited POL time/interaction required.</li> </ul> | Likely defensible in the short term but would require updating in the near future | £15,000 to £75,000  |

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| Option | Summary                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            | Pros/Cons                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  | Defensibility                                        | Cost range (ex VAT)                                                                                         |
|--------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------|-------------------------------------------------------------------------------------------------------------|
|        | any original hard copy case files relevant to particular Claimants.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                | ✓ Shows a genuine attempt to preserve documents based on the current state of the claim.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |                                                      |                                                                                                             |
| 4      | <p><b>Undertake further scoping work and then forensically copy documents from key individuals and in key locations</b></p> <p>Undertake a detailed further review of document locations/custodians and attend meetings with potential custodians and/or teams to obtain information on storage processes.</p> <p>Also scope out documents held in relation to each individual Claimant.</p> <p>This scoping work would allow a list to be drawn up of key individuals and key shared document locations (eg. relevant parts of Sharepoint, etc).</p> <p>Forensic images can then be taken of any electronic documents stored on key individual email accounts and personal files and in any other key shared workspaces.</p> <p>With respect to external documents within Post Office's control, locate key external business partners and stakeholders (eg. Fujitsu) and send bespoke hold notices to them.</p> <p>With respect to hard copy documents, obtain and store any original hard copy case files relevant to particular Claimants.</p> | <ul style="list-style-type: none"> <li>✗ Would require time from business units in order to scope locations of documents.</li> <li>✗ Would require the assistance of a third party e-Disclosure provider.</li> <li>✗ Provides a good level of protection but protection is limited by the value of the information extracted from Post Office teams and is not future proof (eg. more documents could be created after copies are taken).</li> <li>✓ Likely to preserve major locations of key documents.</li> <li>✓ Shows a genuine attempt to preserve documents.</li> <li>✓ Reduces the burden when Post Office reaches the disclosure stage in this action.</li> </ul> | Defensible but not perfect.                          | <p>Cost of scoping work:<br/>£10,000 - £20,000</p> <p>Cost of imaging documents:<br/>£25,000 - £150,000</p> |
| 5      | <p><b>Forensically image all key IT systems</b></p> <p>Engage an external e-Disclosure service provider to take a forensic mirror image of all Post Office servers and document storage locations.</p> <p>With respect to external documents within Post Office's</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              | <ul style="list-style-type: none"> <li>✗ Time consuming (but less so than above).</li> <li>✗ Most expensive option (due to IT costs of mirroring very large amounts of data).</li> <li>✗ Provides full protection with respect to historic electronic documentation only (still</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                 | Gold standard, minimal risk of preservation failure. | £700,000 - £1,500,000                                                                                       |

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| Option | Summary                                                                                                                                                                                                                                                                                                                                                                | Pros/Cons                                                                                                                                                                                                                                                                                                                  | Defensibility | Cost range (ex VAT) |
|--------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------|---------------------|
|        | <p>control, we would propose locating the key external business partners and stakeholders and send bespoke hold notices and/or document requests to them (with the option to obtain forensically sound copies where appropriate).</p> <p>With respect to hard copy documents, obtain and store any original hard copy case files relevant to particular Claimants.</p> | <p>need to rely on the hold notices to prevent future deletions.</p> <ul style="list-style-type: none"><li>✓ Less invasive/time consuming than option 4 above.</li><li>✓ Provides full protection with respect to historic documentation and avoids the need to revisit retention (certainly in the short term).</li></ul> |               |                     |

**SCHEDULE 2: CATEGORIES OF DOCUMENTS ALREADY PRESERVED**

| <b>Team</b>        | <b>Paper files</b><br><i>These have been scanned and loaded into the data room.</i> | <b>Electronic files</b><br><i>These have been forensically imaged from PO's servers and loaded into the data room.</i>                                                                                                                                                           |
|--------------------|-------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Contract Advisers  | Files for all 198 Claimants – where still available                                 | Key parts of the Contract Adviser SharePoint site<br><br>All of the Electronic Filing Cabinets (used prior to SharePoint)                                                                                                                                                        |
| Security           | Files for all 198 Claimants – where still available                                 | Data was collected for the CCRC project from Security and Royal Mail's drives in July 2015 and specific files from Jarnail Singh's folder. This data is continuing to be preserved. We have however not updated this data (ie. data after July 2015 has not been preserved yet). |
| Field teams        | <i>No paper files</i>                                                               | Data was collected from key parts of the Field team SharePoint site (including Branch Contact and audit files)                                                                                                                                                                   |
| Former Agent Debt  | Files for all 198 Claimants – where still available                                 | <i>No material paper files</i>                                                                                                                                                                                                                                                   |
| Current Agent Debt | <i>No paper files</i>                                                               | Reports generated from Core Finance and POL SAP on transaction corrections issued to branches and debt history<br><br>A copy has also been taken of the FSC Relationship Manager's (Andy Winn) SharePoint                                                                        |
| NBSC               | <i>No paper files</i>                                                               | Call logs for the 110 Case Review Claimants                                                                                                                                                                                                                                      |
| HSD call logs      | <i>ATOS have not reported any paper files</i>                                       | Following review of the NBSC call logs, a selection of logs were requested from ATOS for the 110 review Claimants                                                                                                                                                                |
| NT                 | <i>No material paper files</i>                                                      | Specific spreadsheets were extracted from the NT SharePoint covering financial data and an overview tracker of branches moving through the                                                                                                                                       |



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| <b>Team</b>         | <b>Paper files</b><br><i>These have been scanned and loaded into the data room.</i> | <b>Electronic files</b><br><i>These have been forensically imaged from PO's servers and loaded into the data room.</i>                                                                                                                              |
|---------------------|-------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                     |                                                                                     | NT program                                                                                                                                                                                                                                          |
| Fraud Analysis      | <i>No paper files</i>                                                               | Reports generated from SharePoint to show which of the 110 Case Review Claimants had been investigated for potential fraud and which of those cases either resulted in non-suspension or were escalated for further investigation, e.g. by Security |
| HR Assistant Checks | <i>No material paper files</i>                                                      | Reports were generated from the HR Assistant Checks team for the 110 case review Claimants showing the names of registered Assistants at each branch                                                                                                |
| Training            | <i>No material paper files</i>                                                      | Contents of Sandra McBride's laptop, who was responsible for maintaining training materials                                                                                                                                                         |

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**SCHEDULE 3: DOCUMENTS ALREADY PRESERVED – BY CLAIMANT**

Note: excludes mediation scheme cases where information was already captured as part of the mediation scheme.

| No | Claimant/ branch | NBSC call logs | HSD call logs | Security hard copy file | Security electronic files<br>(From CCRC) | Former Agent debt hard copy file | Contract Adviser hard copy file | HR Assistant info |
|----|------------------|----------------|---------------|-------------------------|------------------------------------------|----------------------------------|---------------------------------|-------------------|
| 2  | GRO              | Yes            | Yes           |                         |                                          |                                  | Yes                             | Yes               |
| 3  | GRO              |                |               |                         |                                          | Yes                              | Yes                             | Yes               |
| 4  | GRO              | Yes            | Yes           |                         | Yes 2015                                 |                                  | Yes                             |                   |
| 5  | GRO              | Yes            |               |                         |                                          | Yes                              |                                 | Yes               |
| 6  | GRO              | Yes            |               |                         |                                          |                                  | Yes                             | Yes               |

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| No | Claimant/ branch | NBSC call logs | HSD call logs | Security hard copy file | Security electronic files<br>(From CCRC) | Former Agent debt hard copy file | Contract Adviser hard copy file | HR Assistant info |
|----|------------------|----------------|---------------|-------------------------|------------------------------------------|----------------------------------|---------------------------------|-------------------|
| 6  | GRO              | Yes            |               |                         |                                          | Yes                              | Yes                             | Yes               |
| 6  | GRO              | Yes            | Yes           |                         |                                          |                                  | Yes                             | Yes               |
| 8  | GRO              |                |               |                         |                                          |                                  |                                 |                   |
| 10 | GRO              | Yes            |               |                         |                                          |                                  | Yes                             |                   |
| 13 | GRO              | Yes            |               |                         |                                          |                                  | Yes                             | Yes               |
| 13 | GRO              | Yes            |               |                         |                                          |                                  | Yes                             | Yes               |
| 15 | GRO              | Yes            | Yes           | Yes 2017                |                                          | Yes                              | Yes                             | Yes               |
| 17 | GRO              | Yes            | Yes           | Yes 2015                | Yes 2015                                 | Yes                              | Yes                             |                   |

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| No | Claimant/ branch | NBSC call logs | HSD call logs | Security hard copy file | Security electronic files<br>(From CCRC) | Former Agent debt hard copy file | Contract Adviser hard copy file | HR Assistant info |
|----|------------------|----------------|---------------|-------------------------|------------------------------------------|----------------------------------|---------------------------------|-------------------|
| 23 | GRO              | Yes            | Yes           |                         |                                          | Yes                              | Yes                             |                   |
| 24 | GRO              | Yes            |               |                         |                                          |                                  |                                 | Yes               |
| 26 | GRO              | Yes            |               |                         |                                          |                                  | Yes                             | Yes               |
| 28 | GRO              | Yes            | Yes           |                         |                                          |                                  |                                 | Yes               |
| 29 | GRO              | Yes            |               |                         |                                          | Yes                              | Yes                             | Yes               |
| 33 | GRO              | Yes            |               |                         |                                          | Yes                              | Yes                             |                   |
| 31 | GRO              | Yes            |               |                         |                                          | Yes                              | Yes                             | Yes               |
| 35 | GRO              | Yes            |               |                         |                                          |                                  | Yes                             | Yes               |



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| No | Claimant/ branch | NBSC call logs | HSD call logs | Security hard copy file | Security electronic files<br>(From CCRC) | Former Agent debt hard copy file | Contract Adviser hard copy file | HR Assistant info |
|----|------------------|----------------|---------------|-------------------------|------------------------------------------|----------------------------------|---------------------------------|-------------------|
| 38 | GRO              | Yes            | Yes           |                         |                                          |                                  | Yes                             | Yes               |
| 39 | GRO              | Yes            | Yes           |                         |                                          | Yes                              |                                 | Yes               |
| 42 | GRO              | Yes            |               |                         |                                          |                                  |                                 |                   |
| 43 | GRO              | Yes            | Yes           |                         |                                          |                                  | Yes                             |                   |
| 44 | GRO              | Yes            | Yes           | Yes 2017                |                                          | Yes                              | Yes                             | Yes               |
| 49 | GRO              | Yes            |               |                         |                                          |                                  | Yes                             | Yes               |
| 50 | GRO              | Yes            | Yes           |                         |                                          |                                  | Yes                             |                   |
| 52 | GRO              | Yes            |               | Yes 2017                |                                          | Yes                              |                                 |                   |
| 54 | GRO              | Yes            | Yes           |                         |                                          |                                  | Yes                             | Yes               |

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|----|------------------|----------------|---------------|-------------------------|------------------------------------------|----------------------------------|---------------------------------|-------------------|
| 56 | GRO              | Yes            |               |                         |                                          |                                  | Yes                             | Yes               |
| 61 | GRO              | Yes            |               |                         |                                          |                                  | Yes                             | Yes               |
| 22 | GRO              | Yes            | Yes           |                         |                                          | Yes                              | Yes                             |                   |
| 62 | GRO              | Yes            |               |                         |                                          |                                  | Yes                             | Yes               |
| 63 | GRO              |                |               |                         |                                          |                                  | Yes                             | Yes               |
| 63 | GRO              | Yes            |               |                         |                                          |                                  | Yes                             | Yes               |
| 63 | GRO              |                |               |                         |                                          |                                  |                                 |                   |
| 63 | GRO              |                |               |                         |                                          |                                  |                                 |                   |

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| No | Claimant/ branch | NBSC call logs | HSD call logs | Security hard copy file | Security electronic files<br>(From CCRC) | Former Agent debt hard copy file | Contract Adviser hard copy file | HR Assistant info |
|----|------------------|----------------|---------------|-------------------------|------------------------------------------|----------------------------------|---------------------------------|-------------------|
|    | GRO              |                |               |                         |                                          |                                  |                                 |                   |
| 63 | GRO              |                |               |                         |                                          |                                  |                                 |                   |
| 63 | GRO              |                |               |                         |                                          |                                  |                                 | Yes               |
| 63 | GRO              |                |               |                         |                                          |                                  | Yes                             |                   |
| 64 | GRO              | Yes            |               |                         |                                          | Yes                              |                                 | Yes               |
| 66 | GRO              | Yes            | Yes           | Yes 2017                |                                          | Yes                              | Yes                             | Yes               |
| 67 | GRO              | Yes            |               |                         |                                          |                                  | Yes                             | Yes               |
| 70 | GRO              | Yes            | Yes           |                         |                                          |                                  | Yes                             | Yes               |

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|----|------------------|----------------|---------------|-------------------------|------------------------------------------|----------------------------------|---------------------------------|-------------------|
| 76 | GRO              | Yes            |               |                         |                                          | Yes                              | Yes                             | Yes               |
| 77 | GRO              | Yes            |               | Yes 2017                |                                          | Yes                              | Yes                             | Yes               |
| 79 | GRO              | Yes            |               |                         |                                          |                                  | Yes                             | Yes               |
| 79 | GRO              | Yes            |               |                         |                                          |                                  | Yes                             | Yes               |
| 81 | GRO              |                | Yes           |                         |                                          | Yes                              | Yes                             | Yes               |
| 82 | GRO              | Yes            | Yes           |                         |                                          |                                  | Yes                             | Yes               |
| 83 | GRO              | Yes            |               |                         |                                          |                                  | Yes                             |                   |
| 84 | GRO              | Yes            | Yes           |                         |                                          |                                  | Yes                             | Yes               |

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| No | Claimant/ branch | NBSC call logs | HSD call logs | Security hard copy file  | Security electronic files<br>(From CCRC) | Former Agent debt hard copy file | Contract Adviser hard copy file | HR Assistant info |
|----|------------------|----------------|---------------|--------------------------|------------------------------------------|----------------------------------|---------------------------------|-------------------|
| 86 | GRO              | Yes            |               |                          |                                          |                                  | Yes                             | Yes               |
| 86 | GRO              | Yes            |               |                          |                                          |                                  | Yes                             | Yes               |
| 87 | GRO              | Yes            | Yes           |                          |                                          |                                  | Yes                             | Yes               |
| 89 | GRO              | Yes            |               |                          |                                          | Yes                              | Yes                             | Yes               |
| 90 | GRO              | Yes            | Yes           | Ongoing by Paul Lorraine | Yes 2015                                 |                                  | Yes                             |                   |
| 91 | GRO              | Yes            |               |                          |                                          | Yes                              | Yes                             |                   |
| 92 | GRO              | Yes            | Yes           |                          |                                          |                                  | Yes                             |                   |
| 93 | GRO              | Yes            |               |                          |                                          |                                  | Yes                             |                   |



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|-----|------------------|----------------|---------------|-------------------------|------------------------------------------|----------------------------------|---------------------------------|-------------------|
| 94  | GRO              | Yes            |               |                         |                                          |                                  |                                 | Yes               |
| 95  | GRO              | Yes            | Yes           |                         |                                          |                                  | Yes                             | Yes               |
| 96  | GRO              |                |               |                         |                                          |                                  |                                 |                   |
| 98  | GRO              | Yes            |               |                         |                                          |                                  | Yes                             | Yes               |
| 98  | GRO              | Yes            |               |                         |                                          | Yes                              | Yes                             |                   |
| 98  | GRO              |                |               |                         |                                          |                                  | Yes                             | Yes               |
| 100 | GRO              | Yes            |               |                         |                                          |                                  |                                 |                   |
| 104 | GRO              | Yes            | Yes           |                         |                                          |                                  |                                 | Yes               |

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|-----|------------------|----------------|---------------|-------------------------|------------------------------------------|----------------------------------|---------------------------------|-------------------|
| 105 | GRO              | Yes            | Yes           |                         |                                          |                                  | Yes                             | Yes               |
| 107 | GRO              | Yes            | Yes           |                         |                                          |                                  | Yes                             | Yes               |
| 111 | GRO              | Yes            | Yes           |                         |                                          |                                  | Yes                             | Yes               |
| 112 | GRO              | Yes            |               |                         |                                          | Yes                              | Yes                             | Yes               |
| 113 | GRO              | Yes            |               |                         |                                          |                                  | Yes                             | Yes               |
| 116 | GRO              | Yes            |               |                         |                                          |                                  | Yes                             | Yes               |
| 116 | GRO              | Yes            |               |                         |                                          |                                  |                                 |                   |
| 116 | GRO              |                |               |                         |                                          |                                  | Yes                             | Yes               |

## CONFIDENTIAL AND LEGALLY PRIVILEGED

| No  | Claimant/ branch | NBSC call logs | HSD call logs | Security hard copy file  | Security electronic files<br>(From CCRC) | Former Agent debt hard copy file | Contract Adviser hard copy file | HR Assistant info |
|-----|------------------|----------------|---------------|--------------------------|------------------------------------------|----------------------------------|---------------------------------|-------------------|
| 118 | GRO              | Yes            | Yes           |                          |                                          |                                  | Yes                             | Yes               |
| 121 | GRO              | Yes            |               |                          |                                          |                                  | Yes                             | Yes               |
| 122 | GRO              | Yes            | Yes           |                          |                                          | Yes                              |                                 |                   |
| 122 | GRO              |                |               |                          |                                          |                                  |                                 | Yes               |
| 123 | GRO              | Yes            |               |                          |                                          | Yes                              |                                 | Yes               |
| 125 | GRO              | Yes            |               |                          |                                          |                                  | Yes                             | Yes               |
| 126 | GRO              | Yes            |               |                          |                                          |                                  | Yes                             |                   |
| 130 | GRO              | Yes            | Yes           | Ongoing by Paul Lorraine | Yes 2015                                 |                                  | Yes                             | Yes               |

## CONFIDENTIAL AND LEGALLY PRIVILEGED

| No  | Claimant/ branch       | NBSC call logs | HSD call logs | Security hard copy file  | Security electronic files<br>(From CCRC) | Former Agent debt hard copy file | Contract Adviser hard copy file | HR Assistant info |
|-----|------------------------|----------------|---------------|--------------------------|------------------------------------------|----------------------------------|---------------------------------|-------------------|
| 130 | <b>GRO</b>             | Yes            | Yes           | Ongoing by Paul Lorraine | Yes 2015                                 |                                  | Yes                             | Yes               |
| 131 | <b>GRO</b>             | Yes            |               |                          |                                          |                                  | Yes                             | Yes               |
| 133 | <b>GRO</b>             | Yes            | Yes           |                          |                                          | Yes                              | Yes                             | Yes               |
| 134 | <b>GRO</b>             | Yes            | Yes           |                          |                                          | Yes                              | Yes                             | Yes               |
| 137 | <b>GRO</b>             | Yes            |               |                          |                                          |                                  |                                 |                   |
| 137 | <b>GRO</b>             |                |               |                          |                                          |                                  |                                 | Yes               |
| 138 | <b>GRO</b>             | Yes            | Yes           |                          |                                          |                                  | Yes                             |                   |
| 139 | <b>Anonymity Order</b> | Yes            |               |                          |                                          |                                  | Yes                             |                   |

## CONFIDENTIAL AND LEGALLY PRIVILEGED

| No  | Claimant/ branch | NBSC call logs | HSD call logs | Security hard copy file | Security electronic files<br>(From CCRC) | Former Agent debt hard copy file | Contract Adviser hard copy file | HR Assistant info |
|-----|------------------|----------------|---------------|-------------------------|------------------------------------------|----------------------------------|---------------------------------|-------------------|
| 140 | GRO              | Yes            |               |                         |                                          | Yes                              | Yes                             | Yes               |
| 144 | GRO              |                |               |                         |                                          |                                  | Yes                             | Yes               |
| 144 | GRO              |                |               |                         |                                          |                                  |                                 | Yes               |
| 145 | GRO              | Yes            |               |                         |                                          | Yes                              | Yes                             | Yes               |
| 147 | GRO              | Yes            | Yes           |                         |                                          |                                  | Yes                             | Yes               |
| 149 | GRO              | Yes            |               | Yes 2017                |                                          | Yes                              | Yes                             | Yes               |
| 150 | GRO              | Yes            |               |                         |                                          | Yes                              | Yes                             | Yes               |
| 151 | GRO              | Yes            |               |                         |                                          |                                  | Yes                             | Yes               |

## CONFIDENTIAL AND LEGALLY PRIVILEGED

| No  | Claimant/ branch | NBSC call logs | HSD call logs | Security hard copy file | Security electronic files<br>(From CCRC) | Former Agent debt hard copy file | Contract Adviser hard copy file | HR Assistant info |
|-----|------------------|----------------|---------------|-------------------------|------------------------------------------|----------------------------------|---------------------------------|-------------------|
| 153 | GRO              | Yes            |               |                         |                                          | Yes                              | Yes                             | Yes               |
| 157 | GRO              | Yes            |               |                         |                                          |                                  | Yes                             |                   |
| 157 | GRO              | Yes            |               |                         |                                          |                                  |                                 | Yes               |
| 11  | GRO              | Yes            |               |                         |                                          | Yes                              | Yes                             | Yes               |
| 11  | GRO              | Yes            |               |                         |                                          | Yes                              | Yes                             | Yes               |
| 11  | GRO              |                |               |                         |                                          | Yes                              |                                 | Yes               |
| 159 | GRO              | Yes            |               | Yes 2017                |                                          |                                  | Yes                             | Yes               |
| 160 | GRO              | Yes            |               |                         |                                          |                                  | Yes                             | Yes               |



## CONFIDENTIAL AND LEGALLY PRIVILEGED

| No  | Claimant/ branch | NBSC call logs | HSD call logs | Security hard copy file | Security electronic files<br>(From CCRC) | Former Agent debt hard copy file | Contract Adviser hard copy file | HR Assistant info |
|-----|------------------|----------------|---------------|-------------------------|------------------------------------------|----------------------------------|---------------------------------|-------------------|
|     |                  |                |               |                         |                                          |                                  |                                 |                   |
| 160 | GRO              | Yes            |               |                         |                                          |                                  | Yes                             | Yes               |
| 162 | GRO              | Yes            | Yes           |                         |                                          |                                  |                                 | Yes               |
| 163 | GRO              | Yes            |               |                         |                                          |                                  | Yes                             | Yes               |
| 164 | GRO              | Yes            |               |                         |                                          | Yes                              | Yes                             |                   |
| 165 | GRO              | Yes            |               |                         |                                          | Yes                              | Yes                             | Yes               |
| 166 | GRO              |                |               |                         |                                          |                                  |                                 | Yes               |
| 168 | GRO              |                |               |                         |                                          |                                  | Yes                             | Yes               |
| 170 | GRO              | Yes            |               |                         |                                          | Yes                              | Yes                             | Yes               |

## CONFIDENTIAL AND LEGALLY PRIVILEGED

| No  | Claimant/ branch | NBSC call logs | HSD call logs | Security hard copy file | Security electronic files<br>(From CCRC) | Former Agent debt hard copy file | Contract Adviser hard copy file | HR Assistant info |
|-----|------------------|----------------|---------------|-------------------------|------------------------------------------|----------------------------------|---------------------------------|-------------------|
| 171 | GRO              |                |               |                         |                                          |                                  |                                 | Yes               |
| 172 | GRO              | Yes            |               |                         |                                          | Yes                              | Yes                             | Yes               |
| 173 | GRO              | Yes            | Yes           |                         |                                          |                                  | Yes                             | Yes               |
| 175 | GRO              | Yes            |               |                         |                                          | Yes                              | Yes                             | Yes               |
| 179 | GRO              | Yes            |               |                         |                                          |                                  | Yes                             | Yes               |
| 180 | GRO              | Yes            |               |                         |                                          |                                  | Yes                             | Yes               |
| 183 | GRO              | Yes            |               |                         |                                          |                                  | Yes                             | Yes               |
| 189 | GRO              | Yes            |               |                         |                                          |                                  |                                 | Yes               |

CONFIDENTIAL AND LEGALLY PRIVILEGED

| No  | Claimant/ branch | NBSC call logs | HSD call logs | Security hard copy file | Security electronic files<br>(From CCRC) | Former Agent debt hard copy file | Contract Adviser hard copy file | HR Assistant info |
|-----|------------------|----------------|---------------|-------------------------|------------------------------------------|----------------------------------|---------------------------------|-------------------|
| 190 | GRO              | Yes            |               |                         |                                          |                                  | Yes                             | Yes               |
| 190 | GRO              | Yes            |               |                         |                                          |                                  | Yes                             |                   |
| 190 | GRO              | Yes            |               |                         |                                          |                                  | Yes                             | Yes               |
| 191 | GRO              |                |               |                         |                                          | Yes                              |                                 | Yes               |
| 192 | GRO              | Yes            | Yes           |                         |                                          |                                  | Yes                             | Yes               |
| 196 | GRO              | Yes            |               |                         |                                          |                                  | Yes                             |                   |

**SCHEDULE 4: AREAS FOR FURTHER PRESERVATION WORK**

| <b>Team</b>         | <b>Tranche 1<br/>Documents that should definitely be preserved.</b>                                 | <b>Tranche 2<br/>Documents that are preferable to preserve</b>                                                                                                                                                                          | <b>Tranche 3<br/>Documents where POL could arguably say that preservation was unreasonable at this stage</b>              |
|---------------------|-----------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------|
| Business wide       |                                                                                                     | Current manuals and policy documents relevant to the Group Action                                                                                                                                                                       | Email accounts and OneDrives of all key individuals with contact with Claimants                                           |
| Contract Advisers   | Hard copy files for additional Claimants where available                                            |                                                                                                                                                                                                                                         |                                                                                                                           |
| Current Agent Debt  | Further reports on transaction corrections and debt history for additional Claimants                | Manuals and policy documents on debt recovery                                                                                                                                                                                           |                                                                                                                           |
| Former Agent Debt   | Hard copy files for additional Claimants where available                                            | POL SAP database.<br><i>This is due to be taken offline later this year. It would be preferable to preserve the database in case historic reports of any other type are needed</i><br><br>Manuals and policy documents on debt recovery |                                                                                                                           |
| Fraud Analysis      | Further reports on Claimants investigated                                                           | Full lift of Fraud Analysis team's SharePoint<br><br>Collection of archived data held on CDs                                                                                                                                            |                                                                                                                           |
| FSC Enquiries teams |                                                                                                     | Manuals and policy documents on transaction enquiries and investigations                                                                                                                                                                | Paper files containing supporting evidence and any investigation into transaction corrections issued to Claimant branches |
| HSD                 | Further call logs for additional Claimants and original Claimants that didn't enter the Case Review | Knowledge Base                                                                                                                                                                                                                          |                                                                                                                           |

## CONFIDENTIAL AND LEGALLY PRIVILEGED

| Team               | Tranche 1<br>Documents that should definitely be preserved.                                         | Tranche 2<br>Documents that are preferable to preserve                                                                                                                                                                                                                                                                                                                         | Tranche 3<br>Documents where POL could arguably say that preservation was unreasonable at this stage |
|--------------------|-----------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------|
| NBSC               | Further call logs for additional Claimants and original Claimants that didn't enter the Case Review | Knowledge Base                                                                                                                                                                                                                                                                                                                                                                 |                                                                                                      |
| Security           | Hard copy files for additional Claimants where available                                            | Security network drive / SharePoint<br><br><i>It has been some time now since the original lift for the CCRC project was done in July 2015. It would be preferable to refresh this</i><br><br>Manuals and policy documents on investigations and prosecutions                                                                                                                  |                                                                                                      |
| Agent Remuneration |                                                                                                     | Reports from HR SAP on remuneration paid to agents                                                                                                                                                                                                                                                                                                                             | Preservation of entire HR SAP database (unless this can be done in a cost effective way)             |
| Branch Standards   |                                                                                                     | Reports from web-based platform on contact with agents for intervention or sales support<br><br>Reports from Combat database on standards failings and training delivered to Claimant branches<br><br>Hard copy completed forms from agents signing confirmation of training delivered<br><br>Files from Google drive on responses from Claimants to surveys about the network |                                                                                                      |
| Cash Management    |                                                                                                     | Reports from SAP on Claimant branch cash holdings<br><br>Reports from Remedy                                                                                                                                                                                                                                                                                                   |                                                                                                      |

## CONFIDENTIAL AND LEGALLY PRIVILEGED

| Team                          | Tranche 1<br>Documents that should definitely be preserved.                         | Tranche 2<br>Documents that are preferable to preserve                                                                                                                                                      | Tranche 3<br>Documents where POL could arguably say that preservation was unreasonable at this stage |
|-------------------------------|-------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------|
|                               |                                                                                     | and Dynamics (call logging database) of calls made by branches to request an increase in cash holdings<br><br>Reports from OneDrive into concerns over cash holdings at Claimant branches (where available) |                                                                                                      |
| Contracts & Policy            |                                                                                     | Manuals and policy documents on contracts, contractual investigations and licence fees                                                                                                                      |                                                                                                      |
| Crown Network                 | Reports from HR SAP and performance records from Branch Managers on Crown employees |                                                                                                                                                                                                             |                                                                                                      |
| Field                         |                                                                                     | Manuals and policy documents on interventions and audits                                                                                                                                                    |                                                                                                      |
| IT (including Fujitsu)        |                                                                                     | Technical documents and manuals on Horizon                                                                                                                                                                  |                                                                                                      |
| Legal                         |                                                                                     | Files from Legal team drive on Claimants<br><br>Files from Cartwright King on Claimants                                                                                                                     |                                                                                                      |
| NT                            |                                                                                     | NT's SharePoint and team drive<br><br>Manuals and policy documents on NT                                                                                                                                    |                                                                                                      |
| Post Office External helpline |                                                                                     | Call records from customers relating to Claimant branches<br><br>Knowledge Base                                                                                                                             |                                                                                                      |
| Scheduling                    |                                                                                     | Records from Access and Dynamics on on-                                                                                                                                                                     |                                                                                                      |

## CONFIDENTIAL AND LEGALLY PRIVILEGED

| Team           | Tranche 1<br>Documents that should definitely be preserved.                                              | Tranche 2<br>Documents that are preferable to preserve | Tranche 3<br>Documents where POL could arguably say that preservation was unreasonable at this stage |
|----------------|----------------------------------------------------------------------------------------------------------|--------------------------------------------------------|------------------------------------------------------------------------------------------------------|
|                |                                                                                                          | boarding Claimants                                     |                                                                                                      |
| Sparrow / SSRT | SharePoint and Huddle for reports and supporting information prepared in relation to Claimants           |                                                        |                                                                                                      |
| Training       | Knowledge Centre & Sandra McBride's OneDrive (previously responsible for maintaining training materials) |                                                        |                                                                                                      |