

Witness Name: John Scott

Statement No: WITN08390100

Dated: 12.05.2023

## **POST OFFICE HORIZON IT INQUIRY**

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### **FIRST WITNESS STATEMENT OF JOHN SCOTT**

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I, John Scott, will say as follows:

#### **INTRODUCTION**

1. I was employed by the Post Office Ltd (“POL”) and other Royal Mail Group (“RMG”) organisations from February 1993 to September 2016.
2. This witness statement is made to assist the Post Office Horizon IT Inquiry (the “Inquiry”) with the matters set out in the Rule 9 Request dated 12 April 2023 (the “Request”).
3. I have addressed the questions put to me by the Inquiry honestly and to the best of my ability, based on my memory of events. However, I wish to highlight that many of the events which I have been asked to comment on took place some ten or more years ago and, due to this passage of time, it has been difficult for me to recall certain events and information. Similarly, some of the matters that I have been asked to comment on are outside my personal

knowledge. Where I am unable to recall something or consider it is outside my knowledge I have indicated this.

4. Please note that I use the term "Network" throughout this statement to describe the various individuals and systems at POL which are responsible for the overall management and operation of Sub Post Offices, Branch Offices and Franchises (i.e. Branches within retail outlets such as The Co-Op and McColl's).

## **BACKGROUND**

5. I have a MSc in Security & Risk Management focusing on preventive security and criminology. I also have other supporting industry qualifications such as a Diploma in Anti-Money Laundering.
6. From February 1993 until September 2016 I was employed by Post Office Corporate Centre, Royal Mail Letters and ultimately POL, which separated from RMG in 2012.
7. I assumed the role of POL Head of Security in 2007, and I held this position until I left the organisation in 2016. Prior to 2007, I had held various roles within RMG Security Teams, which I have outlined below:

- 1) Assistant Investigation Officer (1993-1995);
- 2) Temporary Investigation Officer (1995);

- 3) Royal Mail Security Team Manager (1996-1998);
  - 4) Reorganisation Project Manager (for Post Office Security and Investigations Services and Royal Mail Security) (1998-1999);
  - 5) Head of Security for Royal Mail International (1999-2004); and
  - 6) POL Senior Security Manager for Physical Security (2004- 2007).
8. Cost reductions were a constant and increasing priority throughout the period of my employment and the business was restructured many times throughout my career in an effort to drive down cost. One such restructure in 2006 led to the formation of a centralised Security department within POL; prior to this, the security functions had operated under various other departments. Upon assuming my role as Head of Security in 2007, I organised this centralised team into core “strands”, each with responsibility and conduct over a particular security discipline. Some strands evolved or were amalgamated over time, but broadly, the strands were as follows:
- 1) Risk (Analysis and Intelligence) strand.
  - 2) Commercial Security strand.
  - 3) Asset Security strand.
  - 4) Physical Security Operations strand.
  - 5) Fraud strand.
9. The Risk strand dealt with security events such as burglary, robbery, kidnap, and internal and external fraud providing data, intelligence and statistical analysis.

10. The Commercial Security strand dealt with policy standards and procedures for POL products and services such as mail, telephony, government, mails and financial services, with a view to preventing fraud and money laundering.
11. The Asset Security strand was responsible for defining the policies, standards and procedures for buildings, vehicles, equipment and people in respect of physical attacks (such as burglary, robbery and kidnapping).
12. The Physical Security Operations strand was an operational team, which engaged with Post Offices and Cash Centres across the UK. Amongst other things, this team provided advice on, and responded to, incidents of burglary, robbery and kidnapping at POL sites.
13. The Fraud strand was a nationwide operational team responsible for conducting investigations into alleged criminal offences such as theft, fraud and false accounting in respect of Post Offices, Cash Centres, Cash in Transit vehicles and corporate matters (such as travelling expenses). The Financial Investigations team, which dealt with the recovery of assets, sat within this team, as did the Fraud Prevention team, which was responsible for conducting analysis, supported by the Risk Strand, to develop loss and fraud preventative measures occurring in various areas (for example, postage label fraud). The former was in existence prior to my taking over the team, while the latter was set up after my arrival in 2007.



14. Around 2011, I merged the Fraud and Physical Security Operations strands to create the "Security Operations" strand. This decision was made as part of the effort to drive financial efficiency in line with POL's aforementioned cost-saving agenda, and to create a strand which would be multi-skilled thereby increasing flexibility and resource capability.

15. From 2009 to 2012, the Information Security Team - which previously had been operating under the IT department - was transferred to the Security Team becoming an additional core strand. This team was responsible for information security policies, standards and procedures in relation to systems and data access, and for providing related advisory services to POL.

16. Each strand was led by a Senior Security Manager, who was colloquially referred to within POL and their teams as the "head of" their relevant team. I note that the Inquiry has asked me to provide an overview of my role as "Head of Commercial Fraud", and I believe this is likely to be a reference to the Senior Security Manager in the Commercial Security strand. This is not a role that I have ever held.

17. As Head of Security, I was the principal manager of all the strands. However, in general, I had little to no involvement in their day-to-day operations; I dealt with things at a corporate and organisational level. I have not sought to lay out every element of the job in this statement, but I have below provided a broad overview of what my responsibilities and key priorities were. This information provides context to later paragraphs, where I have responded to specific

questions the Inquiry has asked in respect of my role and my involvement in investigations and prosecutions.

18. The Fraud team had been in place since 1999. I was informed by my predecessor, Tony Marsh, that the Fraud Team was well established, that the investigative framework was effective and running well, and that the investigators were proficient in their role and able to effectively organise and run investigations. That was also my experience. The team also worked directly with the Legal function which provided advice and direction on many aspects of their work. I had one-to-one meetings with the “heads of” all the strands monthly and no issues were ever flagged to me in respect of the Fraud team and the operation of criminal investigations. I was not involved in carrying out or overseeing criminal investigations on a day-to-day basis and an investigation was only ever flagged to me on rare occasions where it was of a particularly serious or sensitive nature. Even when a matter was escalated to me, I would not have had operational input into the investigation itself; my role was primarily one of management and only occasionally one of oversight in respect of specific investigations. To a large extent the Fraud team ran itself with only a need for minimal input from me as overall manager.

19. My remit in respect of investigations did slightly change towards the end of 2013 when I was asked by my line manager at the time, POL General Counsel, Susan Crichton, to review and sign off on any new investigation files in respect of their progression to prosecution. I recall that she made this request verbally and I do not recall what reason she gave. I agreed and took

on the role of reviewing and signing off on any new prosecutions sometime between mid to late 2013. In practice this required me to review those cases that the Legal Team had determined met the standard for prosecution. I do not recall the numbers or details of any of these cases but think it likely that I would have approved the recommendation of the Legal Team in most or all of these cases. This is subject to the important qualification that at this time, and until I left POL in 2016, no prosecutions of new cases were proceeding because it had been deemed necessary to identify a new subject matter expert to give assurance on the Horizon system for court proceedings.

20. In my role as Head of Security there were a range of serious issues that required my attention. One area which was a particular priority for me was physical threats against Sub Postmasters ("SPMs"), and POL employees.

21. As noted, I held the role of Head of Physical Security Operations from 2004 and at this time POL experienced around 1000 plus incidents a year including burglaries, robberies and kidnappings. I managed to successfully put in place measures to reduce this number, but many attacks continued to take place. As POL Head of Security, the most serious of these incidents would be reported up to me. I would immediately become the operational lead upon notification and was required to assemble my team to respond to events in real time.

22. I recall one such event following a robbery at a Post Office which had tragically resulted in the murder of the son of the SPM. This event led to an intense

flurry of action over a period of several weeks, where I was co-ordinating my team to support the police investigation, supporting those who were directly responsible for providing support to the deceased's family, and managing the flow of information to the relevant parts of the business, including to its parent RMG senior executives. The latter responsibility entailed writing reports on a daily basis, which I continued to do for a period of two to three months after the event. I recall that I also dealt with numerous kidnappings during my tenure, which often occurred at night and continued through to the next day. False alerts were also not unusual. All these events took up a significant amount of my time, attention, and resource when they occurred.

23. Physical threats by their nature would materialise suddenly and require an immediate response, as indicated above. More consistent however was the project management work I undertook as part of my role. There were numerous large projects being undertaken across the strands which I often set up and led on, and which often ran for several years. For example, I was heavily involved in the payment card industry data security standards ("PCIDSS") project, which was set up under the Information Security strand. I was also involved in a project which centred on the money laundering regulations.

24. On assuming the role as Head of Security, I brought with me a personal interest in information gathering and data/intelligence analysis to identify and drive down losses. I had developed this in my previous role. I therefore was keen to drive the compilation and analysis of POL information data



("Management Information" or "MI") across the security business in respect of both crime and non-crime related losses. My ethos was one of loss prevention rather than merely reacting to loss. Therefore, in addition to the projects mentioned above, I set up and oversaw various loss reduction projects. This includes the Loss Reduction Programme which I discuss at paragraphs 56 to 58. During the course of these projects, data would be gathered from various systems and products to help to identify where losses were occurring. Manual analysis would then be conducted in respect of the biggest and most repetitive losses identified across POL sites, whether Crowns, Sub Post Offices or Franchise Offices, so that solutions and controls could be developed and put in place. Over the course of 2 to 3 years, analysis was conducted on around 15 to 20 products and services to identify how the losses were being created. This analysis was conducted by the Risk Strand and supported by the Fraud Prevention Team.

25. This manual approach to data collection required a good deal of resources and management given the size of POL's Network, which is why I suggested that POL acquire a digital solution. I subsequently commissioned (supported by Susan Crichton, POL General Counsel) Detica, a subsidiary of BAE Systems Plc, to conduct an initial review of POL's systems with a loss and fraud digitalisation goal in mind. Following its review, Detica advised that data mapping of all POL's systems would be required to obtain a proper understanding of data management. POL subsequently put out a tender for companies to carry out this process, which Detica won. Detica carried out the data mapping and published its final report in 2013, making various

recommendations in respect of POL processes and systems. I have not reviewed that report in preparing this statement and do not recall these recommendations in detail. I do recall that I worked with Detica to draw up a business case for implementing these recommendations. Detica estimated that the cost of the proposal would be between £3m and £5m. I discussed the case with the Chief Financial Officer who deferred the decision to the Programme Director for the Branch Support Programme at the time - Angela van den Bogerd. Angela van den Bogerd ultimately elected to go with a less expensive alternative solution provided by Fujitsu. I had no part in this decision.

26. To summarise, my role as Head of Security was a multifaceted one which, amongst other things, required me to manage sensitive and demanding situations, travel frequently, and oversee various large and complex projects.

**ROLE OF THE SECURITY TEAM AND THE POLICIES / PRACTICES IN PLACE  
RELATING TO CRIMINAL INVESTIGATION AND PROSECUTION**

27. I have been asked by the Inquiry to comment on the role of the Security Team and the policies and practices in place in respect of criminal investigations and prosecutions at POL. Broadly, I have been asked to comment on:

- 1) the rationale for, and history of, bringing private prosecutions at RMG and POL;
- 2) policies and processes governing the conduct of criminal



investigations;

- 3) policies and processes governing audits and suspensions; and
- 4) policies and processes on prosecutions and criminal enforcement proceedings.

I have addressed the specific questions raised by the Inquiry in each of these areas below.

**1. The rationale for, and history of, bringing private prosecutions at RMG and POL**

28. I am reminded by document LCAS0000124 that RMG had a long history of carrying out its own investigations and bringing private prosecutions. I do not have any particular recollection of the rationale for this and had no particular view about it. It was the position when I took up my role and continued to be throughout my tenure.

29. As noted previously, POL separated from RMG in April 2012. I recall that at some point before this separation I asked my line manager, Susan Crichton, whether POL would continue to bring private prosecutions as an independent entity, or whether I should plan to close down that side of my team. I raised this query so that I could organise and resource my team accordingly ahead of the separation. I understood, I think from Susan, that she took the query to the board of directors who determined that prosecutions would continue at POL post-April 2012.

30. POL still had a policy of bringing private prosecutions when I left the organisation in 2016, subject to a new Horizon subject matter expert being identified. As far as I can recall, no new prosecutions were commenced from July 2013 as a new subject matter expert was not in place.

## **2. Policies and processes governing the conduct of criminal investigations**

### General policies

31. I have been asked to consider the following policies, and to explain my role in their development: POL00030578, POL00104812, POL00104806, POL00031004, POL00031003, POL00030580, POL00030579, POL00026573, POL00104857, POL00031008, POL00104853, POL00104855, POL00030786, POL00104929, POL00105226, POL00030602, POL00031005, POL00027863 and POL00030902.

32. I do not recall these policies and I had no role in their development, though I probably would have seen some of them while I was at POL.

33. I note that some of the policies listed are RMG documents. Until 2012, all RMG policies directly applied to POL as a subsidiary. These would therefore have been written and developed by RMG.

34. I also note that some of the policies list me as the owner or as someone who

has assured them, for example, POL00030578 and POL00030580. To reiterate, I do not recall these documents and I am unable to comment as to why I am listed as an assurer or an owner.

Organisation and structure of the Security Team

35. The Inquiry has asked that I comment on the organisation and structure of the Security Team, and any significant changes made during my time as Head of Security. I have provided general commentary on this at paragraphs 8 to 16 above but will elaborate further here.

36. As outlined, I inherited the Security Team in 2007 and restructured it into strands, each strand with a separate function and set of responsibilities and disciplines. There were no major changes to this general structure, save for the aforementioned reassignment of the Information Security strand (in 2009 to 2012), and the merging of the Fraud and Physical Security Operations strands.

37. From 2007 until approximately 2010 or 2011, I reported into the Director of Operations, a role held respectively during that period by Ric Francis, Dave Smith (temporarily, for about three months) and finally Mike Young. In 2010 or 2011, I began reporting into POL's General Counsel instead. Susan Crichton was General Counsel from around 2010 or 2011 until 2013. She was succeeded by Chris Aujard in 2013, and then by Jane McCloud who assumed the role in 2015.

38. Whilst part of RMG, the Head of Security role had a “dotted line” reporting into the RMG Group Security Director. From 2007 to about 2008, I reported to Andrew Wilson and thereafter his successor Tony Marsh who was my predecessor as Head of Security POL. This naturally ceased at separation.

39. The management structure of each strand varied slightly from strand to strand but, as a rule, each team was led by a Senior Security Manager (or “head of”), who reported up to me, with at least one other senior manager underneath. All operational team members were middle managers or above. As previously mentioned, I had one-to-one monthly meetings with the head of each strand, during which they could raise any issues or concerns. I do not recall that any issues in respect of the integrity of investigations or investigator’s capability were ever flagged to me, as explained earlier.

40. The Fraud strand, which from around 2011 merged with Physical Security Operations strand to become the Security Operations strand, was the strand responsible for carrying out criminal investigations. The team was led by a Senior Security Manager who went under different informal titles during the period in which I was Head of Security. They were colloquially known as the “head of” whatever the team was called at any given time. This role was held by Tony Utting on a long term basis until 2007. Tony was succeeded by Dave Pardoe, followed by Iain Murphy (2010/2011), Rob King (2011/2012) and finally Amy Quirk (2015) who was still in the role when I left POL in 2016. An individual called David Pettit may also have performed this role for a short

period. This Senior Security Manager was supported by another senior manager and team leaders, who the investigators reported up to. There was no direct reporting line from the investigators up to me.

The operation of investigations

41. I have been asked numerous questions pertaining to the operation of investigations during my tenure at POL, specifically with regards to:

- i. who within the investigation team determined how a criminal investigation would be conducted;
- ii. the role and involvement of the Financial Investigation Unit (“FIU”);
- iii. the role and involvement of other teams in the process;
- iv. what legislation, policies, guidance and / or principles governed the conduct of investigations and how this changed;
- v. the process for dealing with complaints about conduct of an investigation;
- vi. the supervision conducted over investigations by Security Managers;
- vii. POL’s approach to suspected fraud and combatting fraud; and
- viii. any differences in, and changes to, the policy and practice regarding the practice of Crown Office employees.

42. I have addressed these questions as far as I can in the paragraphs that follow, but as explained above, I was not involved in the day-to-day operations of any of the strands, including the Fraud/Security Operations strand. I would only



have had awareness of specific cases on the rare occasions on which they were escalated to me. Likewise, I only had and have limited knowledge on the mechanics of an investigation.

43. The Fraud strand senior management and team leaders were responsible for the conduct of the investigations along with the investigators. As explained at paragraph 18, I was told by my predecessor that the investigators in the team were experienced and I understood that they were well versed in investigative processes. I therefore assume that it would have been the investigators themselves who would decide how a criminal investigation would be conducted, applying the relevant policies as appropriate.

44. In terms of the FIU, this was a subgroup that always sat within the Fraud strand, including before it became part of the new structure in 2007. I did not set up the FIU; the team was already established when I assumed my role as Head of Security. This team was comprised of qualified financial investigators with various powers under the Proceeds of Crimes Act 2002, who were trained, assessed and qualified by the police service. I understand that the police provided supervision and oversight of their activities although I am not certain on what basis. I am not able to comment on the specific circumstances and process for engaging the FIU in an investigation.

45. From my knowledge I can say that the Fraud/Security Operations strand was free to call upon any other team to assist with their investigation, including the Legal Team (as explained further later in this statement), other operational



teams and MI teams. They could also access external vendors such as Fujitsu, Camelot and the ATM providers. The investigators would have had constant engagement with wider teams in POL.

46. With regards to the legislation, policies, guidance and / or principles governed the conduct of investigations, I have a general awareness of the application of certain criminal legislation to criminal investigations. I am aware that such legislation applied to POL investigations subject to their respective jurisdiction (i.e. England and Wales, Scotland and Northern Ireland). As with all law related matters, the Legal Team would have been expected to provide guidance and direction as required. In terms of applicable policies and guidance, I have read the various RMG and POL policies which governed POL investigations but I cannot recall seeing these documents before (though I may well have done) and I have no detailed knowledge of how investigation procedures were implemented. Similarly, I am not able to comment on any changes in respect of any relevant policies, guidance or principles; I was not involved in any such changes.

47. In terms of complaints, I would have been aware that there was a complaints process for investigations in place at POL and I have seen POL00104893 in the Inquiry document bundle which details how to deal with complaints from suspects. However, I do not recall this document and was not involved in dealing with complaints generally, except on rare occasions when they were escalated to me.

48. In terms of the supervision of criminal investigations, investigators were managed and supervised by team leaders, who in turn were supervised by the senior managers. I would have expected any issues that required my attention or involvement to have been escalated to me. My recollection is that this happened infrequently.

49. Turning to explain POL's approach to suspected fraud and the responsibilities of the Security Team in combatting fraud, when I took up the role of Head of Security in 2007, there was a strong pro-prosecution stance in respect of losses resulting from fraud. As outlined at paragraph 24 above, I stepped into the role with a more holistic view and agenda for dealing with losses generally, and aimed to promote a broader strategy for the Security Team which would focus more on prevention. The approach to combatting fraud was therefore twofold; to investigate and prosecute fraud where appropriate in line with the policy requirement, but also to look for ways to identify and prevent fraud through other means.

50. On the preventative side, I had established the previously mentioned Fraud Prevention team within the Fraud/Security Operations strand who were helping to drive data analysis of root causes in respect of fraud and losses, and to formulate controls to prevent loss and fraud. On the prosecutorial side, namely where fraud was suspected, the investigators within the Fraud/Security Operations strand would investigate and progress the case accordingly. The FIU might feed into the prosecutorial approach, but as mentioned above, I do not know the specific circumstances in which they

would be engaged in an investigation, or triggers to their involvement.

51. Finally, with regards to investigations concerning Crown Office employees; as far as I am aware, there was no distinction drawn between Crown Office employees and SPMs in terms of the policies and practices regarding investigation.

Specific policies

52. The Inquiry has asked me to specifically consider POL00104900 and to comment on the impact that the separation of POL from RMG had on the criminal investigations policy within POL. I am not aware of any significant impact; POL of course adopted its own policies, though as far as I am aware these largely reflected the previous RMG policies and prosecutions continued as they had before.

53. Similarly, I have been asked to comment on the rationale behind the development of a Post Office specific "Conduct of Criminal Investigations Policy" in 2013 (which I understand is a reference to POL00094143) and to advise whether the draft "Post Office Fraud and Loss Prevention Policy" from 2013 at POL00038603, was ever finalised or approved. I do not recall seeing these policies before. I am not aware of the rationale for the development of POL00094143 and I do not recall making any contribution to it. I note that I am listed as having reviewed and signed off on POL00038603 and I am not sure why that is the case. I do not know if this policy was ever finalised or

approved.

54. I have also been asked to consider the document entitled "Security Team Objectives 2013 – 2014" dated April 2013 at POL00105025. In particular, I have been asked to explain what the Loss Reduction Board and the related Loss Reduction Programme were, when they were set up, and what their purpose was.

55. POL00105025 sets out the objectives of every member of the Security Team for 2013-2014. I recall that this document was produced ahead of one of our annual POL Security Team conferences. The conference was a two-day event for the entire Security Team, during which we discussed the objectives for the next 12 months, heard from various strands about the specific work they had been doing, and engaged in team building activities. I do not know why POL00105025 was produced but I think it must have been to provide visibility of the objectives across the strands. I do not believe such a document was ever produced again, although everyone had objectives set each year.

56. I can see that the Loss Reduction Programme and Loss Reduction Board are referred to under my objectives. I can confirm that I was responsible for driving and overseeing both of these areas.

57. POL's loss ledger included losses from across the entire business, including criminal losses such as fraud, burglary, robbery and kidnapping and non-crime related losses. The Loss Reduction Programme was a project centred

on driving down the non-crime related losses on the ledger. The purpose of the Loss Reduction Board was to oversee the programme and to consider how to deal with the losses. Crime related losses were dealt with separately.

58. I am not exactly sure when this programme was set up, but I think that it was some time in 2013. I recall that I set up monthly meetings for the Loss Reduction Board which I chaired, and that I assigned Tony Newman, a Senior Manager from the Commercial Security strand, as the project lead. He was responsible for liaising with the relevant stakeholders on the project.

### **3. Policies and processes governing audits and suspensions**

#### Audits

59. The Inquiry has asked me to address various questions about audits, including their relevance to, and impact on, prosecutions. These questions require me to comment on:

- i. the circumstances in which an auditor would be sent to conduct an audit at a Post Office Branch;
- ii. the circumstances around an investigator's attendance at, and role in, Branch audits;
- iii. how short falls identified as part of an audit were dealt with;
- iv. cash verification exercises; and
- v. the process followed by Security Team investigators when conducting



a criminal investigation following the identification of a shortfall at an audit.

60. My insight into the audit process is limited, as the Audit team was a wholly separate team to the Security Team during my tenure. I am therefore unable to explain the specific circumstances in which an auditor would be sent to conduct a Branch audit. The Security Team could instigate an audit as they so desired and there were probably a range of circumstances which might trigger this course of action. For example, where an outlier was spotted as a result of analysis that the team had carried out, or where an issue was raised by the POL Network.

61. In respect of the circumstances around an investigator's attendance at, and role in, Branch audits I have been referred to POL00084813. This is a guide on audit attendance and it is not a document that I recognise and is most likely an Audit team document. I would think that the terms of any audit attendance would be organised by the investigator and / or team leader / management of the Fraud/Security Operations strand with the relevant auditor.

62. I have been asked several questions in respect of shortfalls identified during an audit. First, I have been asked to advise who the auditor would report shortfalls or discrepancies to. I am unable to comment on this; I have no awareness of the what the Audit team's notification or escalation processes were.



63. Secondly, I have been asked to explain what and who determined whether an investigation into potential criminality was conducted by the Security Team where a shortfall was identified, or whether the case was taken forwards as a debt recovery matter by the Financial Services Centre and / or the relevant Legal Team. I have also been asked to explain whether this process changed during my tenure. I recall that as a general rule, it would be the Network managers (a Branch manager, for example) who would request the assistance of the Security Team. They may have had criteria to meet in order to trigger an investigation, but I have no knowledge of this. If the investigator had requested the audit, then the investigator would be involved in the decision to investigate. I am not aware of any change to this process throughout my tenure.

64. Thirdly, I have been asked whether the SPM's local contract manager would have had any input into the decision to investigate where a shortfall was identified following an audit, and whether this changed during my tenure. As explained above, Network managers did have input into the decision-making process, as they were the persons who decided to report to the Security Team or not. I am not aware of any changes being imposed.

65. Finally, I have been asked what the triggers / criteria were for raising a fraud case following the identification of a shortfall / discrepancy in a SPM's Branch, whether the triggers / criteria for raising a theft or false accounting case were different and if so what were they, and whether this changed during my tenure. I have been referred to Appendix 1 of POL00104825 as a document aid. I can

see from this document that there were triggers / criteria for raising a fraud case and I do not believe there would have been different triggers for raising a theft or false accounting case. However, this is not within my knowledge and I cannot confirm.

66. I note that the Inquiry has specifically highlighted that by February 2013 there was a set process/order of steps for Security Team investigators to follow, as per POL00105223, and it has asked me to comment on how the process was different prior to this date. I cannot recall this document; however, I do not recall any significant changes to this process being escalated.

67. In respect of cash verification exercises, I have been asked to consider POL00104825, which is a memo to the Security Team dated 15 December 2009. Specifically, I have been asked to explain the rationale for conducting cash verification exercises in all Branches "(except Crowns)" ahead of the migration to Horizon online, and to explain the impact of this requirement and the migration to Horizon online more broadly on the work of the Fraud strand. I do not recall this memo and I do not know whether I have seen it before. However, I can understand its contents and I am therefore able to comment on it.

68. The memo refers to a one-off programme of audit visits which were to take place ahead of the transition from Horizon Legacy (Horizon Version 1) to Horizon Online (Horizon Version 2). As part of the transition programme, it was decided that, upon transfer, every office would go through a cash and

stock verification exercise. I do not recall that the Crown Offices were not included. I do not know why that was the case.

69. The rationale for conducting these audits was to ensure that any discrepancies in the old system (Horizon Version 1) were addressed and not carried through to the new system. I cannot specifically recall what the impact of these audits was, nor can I recall the impact of the migration on the work of the Security Team generally. As suggested by the memo, a possible spike in the number of frauds uncovered was expected upon migration to Horizon Online. I do not recall whether this spike did in fact materialise.

70. I have also been asked to consider Appendix 2 within POL00104825, in respect of the aforementioned cash verification exercise, which sets out three levels of security officers. The Inquiry has asked me to advise whether the requirement for cash verifications to be carried out at all non-Crown Branches impacted upon the decision making around what level of officer should be involved in potential fraud investigations. All investigations were led by, what is defined within this document as, a level 1 competent investigator regardless of Branch type or investigation type.

### Suspensions

71. In respect of suspensions, I have been asked to comment on how decisions about suspensions were linked to decisions about whether or not to raise a fraud case. I have also been asked to consider and to explain the Security

Team's role in suspension decisions where a shortfall was identified by an audit, and whether the decision-making around suspensions differed as between Crown Office employees and SPMs.

72. I am not aware of a connection between a suspension and a decision to raise fraud case. Any decisions around suspensions were considered in their own right and the Security Team had no role in making them. The POL Network would decide whether they wanted to suspend an individual or not. There were times when investigators effected suspensions based on the decision of the relevant Network manager and line management after investigation findings were fed back to them, but investigators were never involved in the suspension decision itself. It follows that I cannot comment on any differences in the decision-making process with regards to Crown Office employees and SPMs as the Network would make these decisions. I have considered POL00104809 and POL00105231 which the Inquiry has highlighted as relevant to the issue of suspensions. I do not recall seeing these documents before and they do not affect the answer I have given.

#### **4. Policies and processes relating to prosecutions**

##### *Prosecution policies*

73. The Inquiry has asked me to consider the following policies and explain my role in their development: POL00030659; POL00030800; POL00031011; POL00030580; POL00031008 (in particular, paragraph 3.2.9);

POL00030598; POL00030685; POL00031034; POL00104929; POL00105226; POL00030602; POL00030686; and POL00030811. I do not recall these policies and had no role in their development, including those that list me as an owner or assurer, such as POL00030580. Any policies on prosecution would have been decided by RMG prior to separation, and post separation by the POL Board and the Legal Team.

74. I have also been asked to describe POL's prosecution policy, the rationale behind it, its aims and any way in which it is changed during my time at POL. I have already provided commentary on this as far as I am able to, at paragraphs 28 to 30, and 49 to 50 above.

#### *Decision making*

75. I have been asked to explain who decided whether a SPM or Crown Office employee should be prosecuted by POL, and what considerations determined whether a prosecution was brought.

76. Until 2013, prosecution decisions were signed off by the head of the Fraud/Security Operations strand. Investigators and their managers had an open line of communication with the RMG or POL Legal Team, who would provide the direction on prosecutions. I took over the "sign off" function in mid to late 2013. The process I adopted in assuming this decision maker role was to review and consider the entire investigation file, including any notes or advice from the POL Legal Team. As previously mentioned, I recall that I did



authorise a number of prosecutions, however I do not recall any being progressed as a new subject matter expert had not been identified.

77. The Inquiry has also asked whether the SPMs' local contract manager would have any input into this decision-making process and whether this changed during the period I work at POL. In addition, it has asked me to explain the test for prosecution and public interest applied to cases.

78. I do not know to what extent the local contract manager had any input into the decision-making process, although I would have expected that there would have been informal discussion between the investigator and the Branch. In terms of the test for prosecution and public interest, this is something the Legal Team would have provided advice on. I have seen the test mentioned in the documentation provided by the Inquiry which would have provided the direction of decision making at the time.

79. I note that the Inquiry has requested my insight on what advice, legal or otherwise, was provided to those making decisions about whether to prosecute a SPM or Crown Office employee, whether legal advice was provided internally or externally, and whether a particular approach applied to cases where a shortfall was identified on audit.

80. As previously stated, all advice and direction on prosecutions decisions was provided by RMG or POL's lawyers, with whom the investigators and their managers had an open line of communication. In addition, the team was able to liaise with POL's external lawyers in respect of advice on prosecutions. I



am not aware of an alternative approach being applied to cases where a shortfall was found during audit, but I cannot really comment because I was not involved in dealing with audits.

81. The above only describes the position in England and Wales. My understanding is that in Scotland the decision to prosecute was taken by the Procurator Fiscal, and in Northern Ireland by the Public Prosecution Service, in both cases, on the basis of their review of the evidence presented to them by the POL investigators.

*Financial Restraint and Confiscation*

82. The Inquiry has asked me to explain in what circumstances steps to restrain a suspect's assets by criminal enforcement methods, such as confiscation proceedings, would be considered. More generally, it has asked who decided whether such proceedings should be pursued and what factors they considered in making such a decision.

83. I am unable to answer either of these questions as I would not have had any involvement in this process or decisions, although policies were in place. Any decisions on criminal enforcement methods would be dealt with by the FIU with their senior managers with direction and advice from RMG or POL's lawyers.

**TRAINING, INSTRUCTIONS AND GUIDANCE TO INVESTIGATORS WITHIN THE  
SECURITY TEAM**

84. With respect to training and guidance given to investigators I have been asked to provide information on:

- 1) training, qualifications and / or experience required for an investigator within the Security Team to be able to conduct investigations where a SPM / SPM's assistant / Crown Office employee was suspected of a criminal offence and whether these requirements changed;
- 2) documentation, instructions, guidance and / or training given to investigators within the Security Team in respect of:
  - i. interviewing a SPM / SPM's assistant / Crown Office employee who was suspected of a criminal offence;
  - ii. taking witness statements in the course of an investigation;
  - iii. conducting searches in the course of an investigation;
  - iv. the duty of an investigation to investigate a case fully;
  - v. obtaining evidence in the course of an investigation;
  - vi. whether, and in what circumstances, evidence should be sought from third parties who might hold relevant evidence and, in particular, Fujitsu, where shortfalls were identified in Branch;
  - vii. an investigator's disclosure obligations; and
  - viii. drafting investigation reports to enable a decision to be made

about the future conduct of a case.

85. In considering the training, qualifications and / or experience required for an investigator within the Security Team to be able to conduct investigations where a SPM / SPM's assistant / Crown Office employee was suspected of a criminal offence (and whether these requirements changed) I have been directed to consider the following documents: Appendix 2 of POL00104825, POL00104805, POL00104932, POL00104944, POL00104945, POL00104948, POL00104953, POL00104952, POL00104986, POL00104989, POL00105002, POL00105008 and POL00105099.

86. I do not recall these documents, though I may have seen some of them when I worked for POL. I have a general understanding of the training, qualifications and experience required for the role of a POL investigator based on my own knowledge. These requirements would have been set and assessed by the RMG, and then later by POL Security Operations senior management. Similarly, where new investigators were being recruited – although I was not involved in the process apart from for senior managers - my messaging to the team was that they should look to hire individuals with a police or law enforcement background which would be an advantage, on account of the skills and experience those individuals would bring. I do not recall being informed of any changes in respect of the training, skills and experience required of investigators.

87. Similarly, I am unable to comment on any instructions, guidance and / or

training given to investigators within the Security Team in respect of the areas listed at (i) to (viii) above. I note that the Inquiry has provided various policies in relation to each of the areas, asking whether these documents were provided to investigators and for a summary of the key points in each. For brevity I do not cite all these documents here, but they have been included in the Index to this statement. Nevertheless, as before, I do not recall these documents; I do not know if or how they were provided to the investigators, however I would expect the Fraud strand senior management to have provided them.

#### **ANALYSING HORIZON DATA AND REQUESTING ARQ DATA FROM FUJITSU**

88. The Inquiry has asked me to answer a range of questions in respect of:

- 1) my knowledge on Horizon data; and
- 2) ARQ requests.

##### **1. My knowledge on Horizon data**

89. The Inquiry has directed me to consider the last heading on page 6 of the document entitled "Security Operations Casework Review" (February 2013) at POL00105223. I have been asked to comment on what analysis was done by Security Team investigators on Horizon data when a SPM / SPM's assistant / Crown Office employee attributed a shortfall to problems with

Horizon, prior to the introduction of the tool Credence (which the Inquiry understands to have been introduced in 2009).

90. I note that the heading I have been referred to on page 6 of POL00105223 is "Credence". I do not recall or have any knowledge of Credence or when it was introduced.

91. I do not know what analysis was done on Horizon data where a SPM / SPM's assistant / Crown Office employee attributed a shortfall to problems with Horizon. I was not routinely notified of such issues; these would have been dealt with by the management team in the Fraud/Security Operations strand.

92. I have also been asked to explain the process for requesting Horizon data from Fujitsu and how that process changed over time. In general terms, I know that investigators would have been able to obtain information from Fujitsu, the system developer, but I do not recall exactly how such information was requested and obtained.

93. I have also been asked to advise whether POL00105213 is of relevance to this question and if I can assist with the likely date of the document. I do not recall this document and have no idea of its date.

## **2. ARQ Logs**

94. In respect of ARQ logs, the Inquiry has asked me to:



- i. outline my understanding of ARQ logs and their use, as well as any other logs I was aware of and how they differed from ARQ logs;
- ii. confirm whether there was a formalised process for requesting ARQ data from Fujitsu prior to the publication of POL00105222 in September 2013;
- iii. explain who made the decision as to whether ARQ data was requested from Fujitsu in any given case;
- iv. comment on whether ARQ data was requested as a matter of course where a shortfall had been identified and the relevant SPM / SPM's assistant/ Crown Office employee attributed the shortfall to problems with Horizon but did not have corroborating evidence of material problems with Horizon, and if not, why not; and
- v. comment on whether ARQ data was provided to the relevant SPM as a matter of course where such data was obtained from Fujitsu in circumstances where a shortfall had been identified and the relevant SPM was attributing the shortfall to problems with Horizon (considering POL00004708).

95. I am aware that ARQ logs were provided for within the Security Team budget.

I understood that ARQ was used as data analysis of the Branch activity in question, but I have no knowledge of precisely what information was actually contained in the report or how it was used. These records would have been managed by investigators and the managers in the Fraud strand. I was not involved in the process and had no awareness generally of how and when ARQ data was requested from Fujitsu, how decisions were made and whether

SPMs were provided with any data that was obtained.

96. I have considered POL00105222 and POL00004708 and cannot comment in respect of either document. I note that POL00004708 is an email chain which refers to such a shortfall situation and a request for data. I am not part of the email chain and do not recall seeing it before. I was not involved in these types of discussions, as a matter of course.

### **ALLOCATION OF RESOURCES AND PRIORITISATION OF CRIMINAL INVESTIGATIONS**

97. I have been asked to consider POL00031003 (in particular, sections 5.5 to 5.7) and POL00030786 (in particular, section 4) and to explain:

- 1) what principles governed the prioritisation of criminal investigations where the level or volume of crime activity affecting a business unit exceeded its capacity to investigate;
- 2) what factors were relevant when deciding on the level of resources to be allocated to a criminal investigation, and who had responsibility for making this decision; and
- 3) during my time as Head of Security, what factors I considered to be relevant to any decision I made regarding the allocation of resources for criminal investigations across business units.

98. I do not recall either POL00031003 or POL00030786. The prioritisation of cases and allocation of resources was determined by management within the Fraud strand, I assume in accordance with the relevant guidance and policy. I do not recall any particular concerns being raised to my attention regarding these issues.

99. As I took a fraud and loss preventative approach through in depth data analysis, alternative loss and fraud preventative methods were adopted and thereby investigations would not necessarily be the primary choice of direction. Around 2008-2009, the Group Security Director of RMG to which I had a reporting line, Tony Marsh, challenged this approach and insisted on full investigations to be carried and prosecutions conducted where appropriate. An assessment identified that this would require a further 40-50 investigators and after discussions at senior executive level by RMG and POL, the preventative approach was accepted and adopted as the way forward for POL.

100. With regards to the question as to what factors I considered relevant to resource allocations, I was not specifically required to consider the allocation of resources for criminal investigations across RMG business units (Royal Mail Letters, Parcel Force etc). I was responsible for allocating resources across the POL Security Team strands which I would do in conjunction with the heads of the strands; we would discuss the priorities across the team and workloads and design a structure to meet the requirements with the head count we had. As the team head count reduced over time, the Fraud strand

and Physical Security Operations strand were merged to become multi-skilled, as discussed at paragraph 14.

### **CASES AGAINST SPMS**

101. I have been asked to comment on my recollection of the criminal cases against the following SPMS:

- 1) Nichola Arch;
- 2) Susan Hazzleton;
- 3) Lisa Brennan;
- 4) David Yates;
- 5) Carl Page;
- 6) David Blakey;
- 7) Tahir Mahmood;
- 8) Oyeteju Adedayo;
- 9) Hughie Thomas;
- 10) Suzanne Palmer;
- 11) Janet Skinner;
- 12) Jo Hamilton;
- 13) Pauline Stonehouse;
- 14) Susan Rudkin;
- 15) Julian Wilson;
- 16) Peter Holmes;
- 17) Seema Misra;

- 18) Allison Henderson;
- 19) Alison Hall;
- 20) Joan Bailey;
- 21) Lynette Hutchings;
- 22) Grant Allen;
- 23) Khayyam Ishaq;
- 24) Angela Sefton; and
- 25) Ann Neild.

102. The only case I can recall from this list is the case of Susan Rudkin. I do not recall the case in detail, but I recall that an aspect concerning the appropriate calculation of the benefit of her alleged fraud for the purposes of post-conviction confiscation proceedings was brought to my attention. I recall this because I was surprised to discover that some element of uplift was added to the amount said to have been stolen, which I thought was unfair

103. The Inquiry has also asked whether there are any prosecutions I had a role in that I consider relevant to the matters being investigated by the Inquiry (in particular, bugs, errors and defects in the Horizon IT System) and whether I have any concerns about any such cases. I do not recall having an operational role in any of the prosecutions listed.

#### **KNOWLEDGE OF BUGS, ERRORS AND DEFECTS IN THE HORIZON SYSTEM**

104. The Inquiry has asked whether I have, or whether I was aware of, any



concerns regarding the robustness of the Horizon IT system. I do not recall having any particular concerns about the robustness of Horizon during my tenure. To the contrary, I understood that certain issues within the system had been identified but the messaging within the business was that any issues were not systemic, and that the Horizon system was robust. I did not have any reason to believe this was not the case.

105. I have also been asked to consider section 6 for POL00086845 and POL00088867 which are accounting losses policies, and to comment on whether the suggestion that system faults with Horizon were “very rare” corresponded with my understanding of the position in 2003.

106. I do not recall either POL00086845 and POL00088867 and I had no understanding of the position in respect of Horizon system faults in 2003. As noted, I did not become Head of Security until 2007; in 2003 I was the Head of Security for Royal Mail International, which was a different business unit within RMG.

## **CHALLENGES TO THE INTEGRITY OF HORIZON AND POST OFFICE INVESTIGATIONS**

107. The Inquiry has highlighted that I was involved in an email exchange in February to March 2010 (POL00054371), in which it was suggested that there should be a ‘general’ due diligence exercise on the integrity of Horizon. I have been asked whether such a ‘general’ due diligence exercise happened at this

stage and if not why not. I have no recollection of this email correspondence but note that I appear to have been copied to it. I do not recall being involved in any conversations about it and I do not recall whether a due diligence exercise happened at this stage.

108. A specific IT article is referred to within the aforementioned email chain at POL00054371, and the Inquiry has asked me to confirm whether I read this article, and if so, what my reaction was. I do not recall this article; however, it is most likely I would have read it. I do not recall what my reaction to it was at the time.

109. I have also been asked whether the challenges to the integrity of Horizon changed my approach to decisions on whether individuals should be prosecuted following the discovery of shortfalls in their Branches on audit and if so how. My attention has been drawn to POL00030689 and POL00103242 in considering these questions.

110. I do not recall POL00030689. I can see this is an email from me to Chris Aujard who was my then line manager. I think this was soon after he took up the role. I do not recall the email or the reason for sending it. I do not have access to the documents attached and I do not recall what they contained though to some extent they are described in the email.

111. I also cannot recall POL00103242. I do not remember the details of the case referenced (Bashir) but I can see that I referred it on to Rodric Williams

who was the lawyer responsible for Second Sight and Horizon issues.

112. There was never a time prior to my departure from POL when I considered that the integrity of Horizon, in terms of its use as a source of evidence in criminal investigations and prosecutions, was a problem. Even after the Second Sight report, the message to the business was that Horizon was reliable and its use in criminal investigations appropriate. My understanding of the reason for pausing the prosecution of new cases from 2013 was the need to identify a new subject matter expert after the Second Sight report raised questions about the current one (see below).

113. I have been asked to consider POL00026572, POL00043531, POL00107129 and POL00099608, and to comment on my involvement in any investigations carried out into the integrity of Horizon. I have been asked to comment particularly with regards to the investigation, advice or reports that were carried out by:

- 1) Second Sight
- 2) Cartwright King
- 3) Simon Clarke
- 4) Brian Altman
- 5) Jonathan Swift KC
- 6) the Bates & Others Group Litigation.

114. In respect of the listed policies; I do not specifically recall

POL00026572, POL00043531, POL00107129 or POL00099608, and although I note that I am included as a recipient for some of these documents, I am unable to comment on them.

115. I have set out my knowledge in respect of the individuals/cases mentioned at (1) to (6) below.

### **1. Second Sight**

116. Second Sight were forensic accountants appointed by POL to look into the Horizon System. I think I may have had one telephone call with them very early on in the process before I asked an Investigations team leader, Dave Posnett, to liaise with them and facilitate the flow of any information they required. I do not believe I ever liaised with them again. I know that they published an interim report on their findings in July 2013. I cannot recall being called into any meetings to discuss the findings. Broadly, I was aware of the findings of the report. I remember that bugs were identified in the Horizon system but, these issues were not considered systemic or significant in terms of the reliance placed on it in criminal investigations. The concern I recall hearing about, was that as a result of the Second Sight report, POL would no longer be able to use the Fujitsu subject matter expert. This was the reason why, around this time, POL had to set about finding a different expert witness. However, prosecutions could not progress until such an expert witness was identified. As far as I recall no new prosecutions after this time proceeded to court. This was the position as at the date that I left POL.

## 2. Cartwright King

117. Cartwright King were external lawyers appointed by POL. They did not become known to me until just prior to or after the separation from RMG, but it is possible that they had been brought on board as external counsel to advise the organisation before this. I was aware in 2013 that they were carrying out a review of criminal cases and my team was authorised to provide them with the relevant papers. I was not involved in this review. Although not in my direct knowledge, at some point, though I cannot remember the date, Cartwright King attended monthly investigation case meetings which I had set up to review the status of investigation and prosecution cases.

## 3. Simon Clarke

118. Simon Clarke is a senior lawyer at Cartwright King. It is possible that I may have met him on a few occasions, but I am unable to recall exactly. I did not have any day-to-day interaction with him.

119. In 2021 I became aware that Mr Clarke, in 2013, had provided two written advice notes for POL, one in respect of the Second Sight findings on the Fujitsu expert, Gareth Jenkins, and another on the disclosure obligations of a prosecutor. During the course of the 2021 Court of Appeal hearings in the *Hamilton & Others Litigation* – where several criminal convictions of SPMs were overturned - I became aware that the latter advice on disclosure contained an allegation in respect of a POL senior officer. The allegation



centred on an order supposedly given to shred the minutes of a meeting where Horizon issues escalated from the Network had been discussed. In the course of hearings, I was identified as the individual who had allegedly given this “shredding” instruction.

120. I know now, from reading the second Clarke advice, that the meeting during which it is alleged that I gave this instruction was the third meeting in a series of meetings set up in July 2013. Cartwright King were in attendance at all the meetings to provide legal advice. I do not recall the specifics, but in general terms I recall that these meetings were set up post publication of the Second Sight interim report to consider holistically Horizon issues being reported, and that various stakeholders across the business attended. Without access to the underlying material, and with the passage of time, it is impossible for me to recall with any certainty what instructions I gave during the relevant meeting and for what purpose. I can however, say categorically, that I never gave any instruction to shred documents or any instruction that was motivated by any intention to suppress disclosure or otherwise interfere with the POL's disclosure and their legal obligations in respect of the prosecutions being brought. I can also say that I was never criticised or disciplined. As noted above, around this time I was tasked by Susan Crichton to review and agree all decisions to prosecute, and I certainly do not recall her saying anything to me about any suggestion that I had given such an instruction.

121. I do recall a meeting with Susan Crichton a while later where she raised the requirement for a more structured centralised issues log which was not in place at that time. Additionally, disclosure was discussed and the whole Security Team subsequently went through disclosure training provided by Cartwright King.

#### **4. Brian Altman KC**

122. I am aware of Brian Altman KC but I had limited dealings with him. I believe that I may have met him once in 2015 or 2016 at a meeting I was asked to attend by my line manager at time - POL General Counsel, Jane McCloud. I do not recall why I was asked to attend the meeting or what was discussed. I was aware in September or October 2013 that a QC was commissioned to review POL's investigation and prosecution framework. I know now that Mr Altman was the person who conducted that review, but I did not know at the time. To the best of my recollection I never saw the report, or its findings; I heard about it from my line manager of the time, Susan Crichton. I recall that her messaging was that the report did not suggest any issue with prosecutions continuing and that the investigations were being conducted effectively.

#### **5. Jonathan Swift KC**

123. I am not familiar with Jonathan Swift KC. I do not believe that I have met or had any engagement with this person and so I am unable to comment on

any investigations, reports or advice which may concern him.

## **6. The Bates & Others Group Litigation**

124. I am aware of the Bates & Others Group Litigation. However, I was not party to those proceedings and I was not called upon to provide any evidence, in writing or orally.

### **OTHER MATTERS**

125. The Inquiry has asked me to highlight any other matters I wish to bring to the attention of the Chair. I can confirm that I have no further matters which I consider relevant to raise at this time.

Statement of Truth

I believe the content of this statement to be true.

Signed: \_\_\_\_\_

**GRO**

Dated: 12 May 2023

**Index to First Witness Statement of John Scott**

<b><u>No.</u></b>	<b><u>URN</u></b>	<b><u>Document Description</u></b>	<b><u>Control Number</u></b>
1.	LCAS0000124	A brief History of Investigations, Prosecutions and Security in Royal Mail	VIS00010364
2.	POL00030578	S02 Royal Mail Group Ltd Criminal Investigation and Prosecution Policy (1 December 2007)	POL-0027060
3.	POL00104812	Royal Mail Group Ltd Criminal Investigation and Prosecution Policy (1 December 2007)	POL-0080444
4.	POL00104806	Royal Mail Group Security – Procedures & Standards – Standards of Behaviour and Complaints Procedure (version 2, October 2007)	POL-0080438
5.	POL00031004	Royal Mail Group Crime and Investigation (S2) (version 3.0, September 2008)	POL-0027486
6.	POL00031003	Royal Mail Group Crime and Investigation Policy (version 1.1, October 2009)	POL-0027485
7.	POL00030580	Post Office Ltd – Security Policy – Fraud Investigation and Prosecution Policy (version 2, 4 April 2010)	POL-0027062



8.	POL00030579	Post Office Ltd Financial Investigation Policy (4 May 2010)	POL-0027061
9.	POL00026573	Royal Mail Group Security - Procedures & Standards – The Proceeds of Crime Act 2002 & Financial Investigations (version 1, September 2010)	POL-0023214
10.	POL00104857	Royal Mail Group Security - Procedures & Standards – Initiating Investigations” (September 2010)	POL-0080489
11.	POL00031008	Royal Mail Group Ltd Criminal Investigation and Prosecution Policy (version 1.1, November 2010)	POL-0027490
12.	POL00104853	Post Office Ltd Financial Investigation Policy (version 2, February 2011)	POL-0080485
13.	POL00104855	Post Office Ltd Anti-Fraud Policy (February 2011)	POL-0080487
14.	POL00030786	Royal Mail Group Policy Crime and Investigation S2 (version 3.0, April 2011)	POL-0027268
15.	POL00104929	Post Office Limited: Internal Protocol for Criminal Investigation and Enforcement (with flowchart), (October 2012)	POL-0080561

16.	POL00105226	Undated Appendix 1 - POL Criminal Investigations and Enforcement Procedure (flowchart) (October 2012)	POL-0080851
17.	POL00030602	Draft Post Office Limited: Criminal Enforcement and Prosecution Policy (November 2012)	POL-0027084
18.	POL00031005	Conduct of Criminal Investigations Policy (version 0.2, 29 August 2013)	POL-0027487
19.	POL00027863	Conduct of Criminal Investigations Policy (version 3, 10 February 2014)	POL-0024504
20.	POL00030902	Conduct of Criminal Investigations Policy (September 2018)	POL-0027384
21.	POL00104900	Separation Project – Criminal Investigations Policy for Post Office Limited	POL-0080532
22.	POL00094143	Post Office Conduct of Criminal Investigation Policy	POL-0094266
23.	POL00038603	Post Office Fraud and Loss Prevention Policy (version 1, 1 October 2013)	POL-0027914
24.	POL00105025	Post Office Security Team Objectives April 2013 – March 2014 (version 1, April 2013)	POL-0080657
25.	POL00084813	Condensed Guide for Audit Attendance (version 2, October 2008)	POL-0081871

26.	POL00104825	Memo dated 15 December 2009	POL-0080457
27.	POL00105223	Post Office Security Operations Casework Review (4 February 2013)	POL-0080848
28.	POL00104809	Royal Mail Group Security – Procedures & Standards – Suspension from Duty (version 1, November 2005)	POL-0080441
29.	POL00105231	Royal Mail Internal Information – Criminal Investigation Team – 7.11 Suspension from Duty (version 1.0 final, May 2012)	POL-0080856
30.	POL00030659	Post Office Internal Prosecution Policy (Dishonesty) (December 1997)	POL-0027141
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32.	POL00031011	Royal Mail Group Prosecution Policy (version 2.1, October 2009)	POL-0027493
33.	POL00030598	Royal Mail Security – Procedures and Standards – Prosecution Decision Procedure (version 2, January 2011)	POL-0027080
34.	POL00030685	Royal Mail Group Prosecution Policy (version 3.0, April 2011)	POL-0027167

35.	POL00031034	Post Office Prosecution Policy (version 1.0) (effective from 1 April 2012)	POL-0027516
36.	POL00030686	Post Office Prosecution Policy England and Wales (effective from 1 November 2013)	POL-0027168
37.	POL00030811	Post Office Limited Prosecution Policy for England and Wales (version 1, 22 January 2016)	POL-0027293
38.	POL00104805	"E"- Learning – Introduction to Investigations – Evidence & Witness Statements (Version 3.0 11/02)	POL-0080437
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44.	POL00104952	Post Office Ltd Security – Post Office Security Team- Key Skills Database	POL-0080584
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46.	POL00104989	Post Office Limited – Internal- People Plan Workstream: Advanced Development	POL-0080621
47.	POL00105002	Email chain re “People Plan Training and Development- Nine Box Model” (June 2013)	POL-0080634
48.	POL00105008	Post Office - Training and Development Record and Request, Etc.	POL-0080640
49.	POL00105099	Post Office - Security Manager- Training & Induction Timetable	POL-0080729
50.	POL00104818	Royal Mail Group Security Investigation Guidelines – Group Investigation Circular 5 – 2008: Written Records of Tape-Recorded Interviews (20 November 2008)	POL-0080450
51.	POL00104836	Royal Mail Group Security Investigation Guidelines – Group Security Investigation Circular 5-	POL-0080468 POL-0080499



		2008: Written Records of Tape-Recorded Interviews (version 5, June 2010)	
52.	POL00104867	Royal Mail Internal Investigation Team – Criminal Investigation Team – 7.4 Interviewing Suspects (version 1.0 final, March 2011)	POL-0080491
53.	POL00104859	Appendix 1 to P&S 7.4 Interviewing Suspects on tape – Quick Reference Guide England and Wales (version 1, March 2011)	POL-0080493
54.	POL00104861	Appendix 4 – Interviewing Suspects Using Notes of Interview Quick Reference Guide – England & Wales (version 1, March 2011)	POL-0080507
			POL-0080850
55.	POL00104875	Royal Mail Internal Information – Criminal Investigation Team – 8.6 Written Record of Tape Recorded Interviews (version 1.0 final, June 2011)	POL-0080459
56.	POL00105225	Investigative Interviewing – A Guide to Interviewing (January 2013)	POL-0080458
57.	POL00104827	Royal Mail Group Security – Procedures & Standards – Witness Statements (version 2, January 2010)	POL-0080460

58.	POL00104826	Royal Mail Group Ltd Security – Procedures & Standards – Appendix 2 to P&S 5.4 – Managing the Witness and Structure and Contents of Witness Statements (version 1, January 2010)	POL-0080481
59.	POL00104828	Royal Mail Group Security – Procedures & Standards – Searching (version 5, January 2009)	POL-0080523
60.	POL00104849	Royal Mail Group Security – Procedures & Standards – Searching (version 6, January 2011)	POL-0080480
61.	POL00104891	Royal Mail Group Ltd Security – Procedures & Standards – Appendix 1 to P&S 5.4 – Rules and Continuity of Evidence (version 1, January 2010)	POL-0080525
62.	POL00104848	Royal Mail Group Ltd Security – Procedures & Standards – Appendix 1 to P&S 9.5 Disclosure of Unused Material & the Criminal Procedure and Investigations Act 1996 (July 2010)	POL-0080513

63.	POL00104893	Royal Mail Internal Information – Criminal Investigation Team – Appendix 7 to 7.4 Dealing with Defence Solicitors & Complaints by Suspects (version 1, March 2011)	POL-0080511
64.	POL00104881	Royal Mail Internal Information – Criminal Investigation Team – 8.2 Guide to the Preparation of Suspect Offender Reports, England, Wales and Northern Ireland (version 1.0 final, June 2011)	POL-0080838
65.	POL00104879	Royal Mail Internal Information – Criminal Investigation Team – Appendix 1 to 8.2 Suspect Offender Reports, Preamble Guide, England, Wales and Northern Ireland (version 1.0 final, June 2011)	POL-0080847
66.	POL00105213	Fraud Risk Security Pro-forma- Guide to Obtaining Reports from Horizon	VIS00005776
67.	POL00105222	Security Investigations Data Handling Process (Fujitsu Horizon Data Request) (September 2013)	POL-0083903
68.	POL00004708	Email chain re “ARQ requests- Barkham Post Office 212939”	POL-0085925

		(between June 2010 and October 2010)	
69.	POL00086845	Post Office Ltd – Security Policy: Accounting losses policy for agency branches (version 1, February 2003)	POL-0050850
70.	POL00088867	Post Office Ltd – Security Policy: Liability for losses policy (for agency branches) (version 1.7, September 2003)	POL-0027171
71.	POL00054371	Email chain re “Horizon disputed cases” (between February and March 2010)	POL-0102825
72.	POL00030689	Email re “Pending Investigations/Prosecutions- Awaiting SME” (7 November 2013)	POL-0023213
73.	POL00103242	Email chain re “Case v Bashir” (August 2016)	POL-0040034
74.	POL00026572	Confidential – Horizon- Response to Challenges Regarding Systems Integrity	POL-0105437
75.	POL00043531	Email chain re “Weekly Horizon Call Notes” (December 2013)	POL-0099191
76.	POL00107129	Confidential – Horizon- Response to Challenges Regarding Systems Integrity	

77.	POL00099608	Email chain re "Emailing: Clearing Tyneside sub-postmaster urges Post Office to admit error- Journal Live htm" (between August and September 2013	
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