

Witness Name: Paul Whitaker

Statement No.: WITN05050100

Dated: 08 October 2023

POST OFFICE HORIZON IT INQUIRY

First Witness Statement of Paul Graham Whitaker

I Paul Graham Whitaker, will say as follows:-

INTRODUCTION

1. I am a former employee of Post Office Limited (POL) and held the position of Investigation Manager (later renamed Security Manager).
2. This witness statement is made to assist the Post Office Horizon IT inquiry (the "Inquiry") with matters set out in the Rule 9 Request dated 31 August 2023 (the "Request")
3. Firstly, in preparation to providing this statement I was told that under certain circumstances POL could provide legal assistance to members of POL staff required to give evidence to the inquiry. I have been told that I meet the criteria for such legal assistance however I am yet to approach any legal firm in respect of this and make this statement without any legal assistance.

4. Secondly, on receipt of the Rule 9 request dated 31 August 2023 I noted that a response was required by 28 September 2023. I immediately informed the inquiry that during that period I would be out of the country for much of September and unable to securely access the information sent to me by the inquiry to support my statement, nor have facility to write my statement. In all I have 'lost' 19 days. I had also made the inquiry aware of this when they had firstly asked for my 'dates to avoid' some weeks before.
5. Whilst I thank the inquiry for the seven-day extension granted to me, I feel that I must point out that this statement has been prepared under those circumstances.

BACKGROUND

6. I joined Royal Mail in July 1985 as a postal cadet in Sheffield. From 1986 to 1994 I worked as a postman delivering and processing mail within the Sheffield area. Between 1994 and 1998, within the Royal Mail Letters function and based in Sheffield, I worked in a section of the organisation which dealt with the function, administration, and inspection of postal franking machines.
7. In September 1998 I joined the Post Office Security and Investigation Service (PO SIS) as an Assistant Investigation Officer and was placed to work in its Parcel Group (North) section which was based in Royal Mail premises in York Place, Leeds.
8. At that time Royal Mail was essentially operating as three separate entities (Royal Mail Letters (RML), Post Office Limited (POL), and Parcelforce) under a Royal Mail Group corporate head. RML and POL

each had their own investigation function, but Parcelforce did not. As such at that stage, as well as dealing with corporate investigations, POSIS had Parcel Group sections which dealt with investigations into crime within the Parcelforce network.

9. On joining POSIS I recall that I had an initial period of induction training which covered relevant aspects of investigation, e.g., law, principles of investigation, evidence gathering, PACE etc, before being assigned to an established officer for 'on the job' training. Further training modules were completed over the following year in subjects such as witness interviewing, and suspect interviewing etc. As I recall I received no specific training to do with POL work at this time, as, within parcel group I was not expected to undertake or assist with any POL investigations.
10. In 1999 Parcelforce introduced its own investigation function, and in September of that year POSIS Parcel Group (North) was disbanded. Its operational staff in Leeds were then compulsorily transferred to different Royal Mail investigation functions. Some staff went into Parcelforce, and others to Royal Mail Cashco (the Royal Mail Groups cash carrying function). Despite having a background in mails work and no previous POL experience, I was sent to work for POL, initially based at their regional headquarters in Leeds in September 1999.
11. I had no say whatsoever in where I was placed at this time.

ROLE & HEIRARCHY

12. I worked as an Investigation Manager (later named a Security Manager) for POL from that time until around 2009 or so when I briefly, (a matter of two months or so), took over as Temporary Team Leader for the South

Investigation team of POL Security before soon returning to my role as Investigation manager. I left POL in January 2012 and took up a job as an Investigation Manager with RML.

13. Shortly before I joined I understand that POL Security had recently split into three operational areas (East, West and North). Working within the North Area, staff at the Leeds office generally dealt with investigations in the North Eastern counties of England. I joined an investigation team with another assistant investigation officer (John Downie, though we had both now been renamed Investigation Managers) and an Investigation Manager (John Hart) who was more senior in experience. The Leeds office also contained some investigation support staff. I recall that a further investigation manager was based in Tyneside, and they assisted in work in that area. We were all expected to undertake and lead investigation cases of our own as well as assist colleagues in cases that they were leading.
14. Above us in the hierarchical scale was a team leader, Les Thorpe, based in Peterlee whom I and the other investigation managers reported to. I believe that he then reported to a senior investigation manager based in Glasgow (Rashid Sarwar), who then reported to the North area Head of Security, (Duncan McFadyen) who was also based in Glasgow.
15. At that time the Security Department within POL was split into Physical Security and Investigation Departments. Physical Security being responsible for the provision of external security apparatus at Post Offices, (Safes, alarms, barriers, security audits etc.) with the Investigation department responsible for the investigation of suspected criminal losses

to POL. Until very late in my time at POL which I will touch on later in this statement I performed duties only within the Investigation team and do not recall with any certainty the hierarchy within the physical security team from this early period.

16. Soon after I joined POL, perhaps around a year later, the security function within POL began a period of rapid change. The investigation function was streamlined and tinkered with a number of times. There were numerous geographical boundary changes and changes of management personnel and structure. I recall that in terms of hierarchy during the period around 2000 to 2007 or so, Tony Marsh headed the POL security function with Phil Gerrish as his Head of Investigations. Below Mr Gerrish was a regional (north/south) Senior Investigation manager and below them were localised team leaders. At the bottom of the pyramid were, Investigation Managers of which I was one.
17. Throughout this time, I was based in Sheffield and worked on investigations in the North of England. Alongside me in the Sheffield office around this time was Helen Dickinson, Kim Abbotts and latterly Helen Hollingworth (Rose). We tended to work together leading our own investigations and supporting each other where required.
18. During this period the team based in Sheffield saw a number of changes of manager, none of whom were based with us on site but we saw them regularly and remained in contact via email and telephone. Two of the line managers I recall from this time were Trevor Lockey, and Paul Dawkins.
19. Around 2007 or thereabouts I recall that Tony Marsh moved from Post Office Limited to become Head of Royal Mail Group Security and soon

afterwards Phil Gerrish left to join Royal Mail Letters as Head of Investigation. John Scott who had been Head of Physical Security at Post Office Limited became Head of Security. Mr Scott oversaw a period of change in Post Office Security as he tried to bring the investigation functions and physical security functions together to streamline the department. During this period, a number of investigation colleagues left POL, many of whom followed Mr Gerrish to Royal Mail Letters. I feel Mr Scott replaced these people with members of staff with more of an expertise in physical security, with staff displaced from other POL departments, or with staff recruited from outside of POL.

20. The team in Sheffield were relocated to POL premises in Future Walk Chesterfield in around 2009. Mr Scott had ordered that all localised teams should be brought together into POL premises and the premises the team used in Sheffield were owned by RML. As such around 2009 we who had been in the Sheffield office joined POL Investigation Manager, Chris Knight in Chesterfield. At that time, again there were many changes to personnel in the wider department, and as I didn't work in Physical security I cannot recall with certainty the hierarchy under Mr Scott at this time.
21. I recall that Mr Scott had a number of Senior Managers, but their remits and jobs changed regularly. Some of the senior managers I recall from this time were John Bigley, Tony Newman, Andy Hayward, Iain Murphy, and Dave Pardoe however, as said, I do not recall their specific roles at specific times, as they often quickly changed.

22. Around the time Mr Scott headed the department the geographical remit changed again and I along with other investigation managers began to work on investigations across the whole of the country, into Scotland and Northern Ireland.
23. I feel that Mr Scott focused more on bringing to POL Security a data driven model to proactively analyse and seek out risk and loss within post offices as opposed using the POL investigation team to investigate losses reactively. Mr Scott brought in much more data analysis in his loss management strategy and set up a dedicated team to do this, I recall Helen Rose being part of that team but unfortunately cannot recall other names.
24. Mr Scott also brought in a team to try to recoup losses through the proceeds of crime act and some investigators were trained as financial investigators. From memory, I recall that these included Ged Harbinson, Graham Ward, Helen Dickinson and Paul Southin.
25. Shortly before I left POL, perhaps around 2011 I recall that Mr Scott stated that he was making the role I was in a dual skilled role combining aspects of both physical security management and investigation. I considered myself to be an investigator, I enjoyed that type of work and the world of physical security did not so much appeal to me, so when a role was advertised I left POL in 2011 and moved across to Royal Mail to work as an Investigation Manager.
26. Throughout my time with POL, I viewed that my role was to investigate potential criminal offences committed against POL or through POL. This consisted, in the main, of investigating theft and or fraud offences that had

been facilitated through a post office. Often by an employee or agent of POL but occasionally not. Potential offences were mainly facilitated through Subpostoffices, but occasionally Branch Offices or Cash Centres.

27. I am not aware of any policies regarding if or how POL treated Crown Office Employees differently when it came to investigating potential offences. As far as the work I was asked to do, everyone was treated the same, be that if they worked in a branch or crown office .
28. I felt that within the tenure of Mr Marsh as Head of Security I found the line management within POL investigation to be supportive and experienced, with many of the managers having come through 'the ranks' as it were. They knew the Investigators role and the challenges it brought. However, I feel that when Mr Marsh, and others left POL, my line management under the leadership of Mr Scott, though reasonable insomuch as they were someone to manage staff, many lacked the experience and understanding within the investigation and criminal justice fields. Managers I remember and consider in respect of that statement were Andrew Daley and Alison Drake.
29. Immediate line managers were involved day to day and knew such things as your general whereabouts, your caseload, and what work you had on at any given time. As said more often than not my manager worked remotely from me but we met regularly in Team meetings (probably once a week) to discuss what work was scheduled for that week, and also I would phone/email them and they would phone/email me should anything crop up which either party felt was relevant. I would say that my line

manager had good oversight of what I was doing though left me to progress my work day to day.

30. Cases were regularly discussed with line managers and idea's relating to the progress of cases were exchanged not only with line managers, but also amongst my peers within the immediate team. Often reports and paperwork were sent to a manager for review before submission.
31. In regard to complaints about the conduct of an investigation by POL security I do not specifically recall the process by which it would be dealt with. I do recall there being accountability though I am unsure of the actual process.

TRAINING

32. At the time of joining POSIS I had no formal specific investigation qualifications. However, whilst working for POL, around 2006 I completed a Level Four National Vocational Qualification in Investigation Management. Most of my training to that point was 'on the job' shadowing and being supported by a more experienced colleague. Before I left POL in 2010 I had begun a Post Graduate Diploma in Security and Risk Management at Leicester University which I subsequently completed whilst working for Royal Mail.
33. Whilst in POL I feel that the training in respect of the investigation role was adequate, and we were trained to a reasonable standard in investigation skills, and any specific major change to the law, policy, or techniques would be dissipated through training courses. As said, many of the skills were developed using 'on the job' training as initially you were normally placed with a more senior colleague who would assist and guide

you through your early investigations. Through time and experience you, needed them less and less before you then became the colleague who would assist others.

34. The specific investigation training I had received and used in POL had been given to me whilst I was in POSIS parcel group. This had consisted of class room training modules spread across my first year with practical applications as I used the skills taught in my day-to-day work. I recall attending training courses covering suspect interviewing, witness interviewing, searching, and report writing. Throughout my time with POL I recall the odd 'refresher' training course on these matters and others. Further comment, specifically on disclosure training and assembling files for crown court use is discussed later in this statement.
35. As said, when I assumed my role in POL investigations I had no previous experience of working behind the counter at a post office. Soon after I joined POL I recall being placed on 'counter clerks' training, which was a couple of weeks training on an induction course designed for new entrant POL counter clerks. The course was for people to familiarise themselves with the counter clerk role and the working practices of POL prior to working in a post office. At that time Horizon was yet to be introduced and on the course I learned about post office stock balancing using a cash account book. I never considered myself an expert in this work as I, had no background in counter work, did not use the methods enough, and I always felt that anyone who used the systems and practices on a daily basis would have far more expertise in them than I would.

36. Specifically in respect of Horizon training, I recall going on a training course over a week or so as the system was being introduced. I cannot recall any other training I received on the system. I do recall however that the course I attended was not specifically for investigation staff as I remember being on the course with other post office staff, including some Subpostmasters.
37. In regard to policies within the POL Security function. I can state that I was not involved at all in the development, setting, or management of policy. This was done at a more senior level than that which I was throughout my time with POL.
38. Also, I don't recall there being a 'central repository' or such where investigators could specifically view policies. The dissemination of information contained within policy, as I recall and understand, was mainly through, training, team meetings, and special directives called 'Investigation Circulars' which would be sent via email to investigation staff.
39. A number of pieces of legislation governed my role as an investigator. These included POL policies but also such things as the Police and Criminal Evidence Act codes of practice, the Criminal Procedures and Investigations Act, Human Rights Act, and as time went on in POL the Proceeds of Crime Act.
40. In the run up to the separation of POL from the Royal Mail Group I do not recall being involved in the development of investigation policies for post separation.

41. Regarding development of policy, I have been asked to consider, Separation Project- Criminal Investigations Policy for Post Office Ltd, (POL00104900), and Activity Plan for POL separation project – Criminal Investigations Policy, (POL00105191), in my reply. Looking at the documents it appears that I was part of a working group looking at 'inputs and outputs for investigation procedures' post separation. Whilst I vaguely recall being part of a focus group with the other people named on the document, I don't recall anything specifically discussed within it, nor how many focus group meetings I attended.

Audit and Investigation

42. In respect of Audit and Investigation, I have been asked to describe my involvement with 'Second Sight'. I can state that I am not aware of what that is so can only conclude that I have not been involved in any way.
43. Though separate departments with POL the Investigation team worked very closely with the Audit team.
44. I never worked for the Audit Team so cannot fully describe their remit however I understand that the Audit team were there to verify reported POL assets within a post office against what was actually there. As I understand it the audit team had a schedule of post offices they would visit. This schedule was based on auditing each post office over a period of time, but I understand that they also used a risk matrix within that to bring audits of particular offices forward if necessary. Also, investigators could contact the audit team scheduler in order to request an audit of a particular post office if required. As I understand it subpostmaster's or branch managers never knew when the auditors would attend.

45. I recall that there were probably two reasons for an investigator to attend an audit. Firstly, when the lead auditor of the attending audit team had identified an issue with the audit they were performing at a post office. Usually this would be a difference or expected difference in what the auditor had verified in the post office account as to what had been declared by the person completing the account balance. I cannot recall if there were specific amount triggers in regard to whether the auditor would call or not. I do recall that towards the end of my time in POL Security there was a trigger that we would not investigate losses below £10,000, but do not recall precisely when that came in.
46. In such an instance where there was a significant shortage, on discovery, the auditor, or members of the audit function would make phone calls to a number of people, including the investigation team.
47. In practical terms from my experience this would probably mean that the audit team called the investigation team local to where they were conducting the audit and reported that a shortfall was to be expected in the post office accounts of the branch they were at. This information was quickly disseminated to the respective investigator by their line manager who had designated them to investigate. If it was me I would then call the auditor, who was still on site to discuss their reported findings, and as a result, if the situation had not been resolved, then more than likely I would attend the Post Office.
48. Also, as we worked closely with the audit teams often they would call us directly to discuss their findings. I would then upwardly report what I had

been told to my line manager before travelling to the affected post office if I felt it necessary.

49. On these occasions, on attendance, if I was the designated lead investigator I would generally speak with the auditor to establish if there had been any developments since their phone call to me and then speak with the Supostmaster or whomever was in charge of the post office. I would explain who I was, what my role was, and why I was there.
50. Once it had been established that evidence from the audit suggested a criminal offence may have been committed I would try to establish a potential suspect. To do this I would try to gather evidence to verify who had produced the most recent office balance, (perhaps the one from the day before) or cash declaration and who had signed the previous office balances. From examining previous cash accounts held on site I may try to look to see approximately when the declared cash holdings of the post office had been close to what POL said they should be. This might be an approximate indicator of a date when things perhaps could have started to go awry at the post office.
51. Depending on the individual situation, such as size of the office, amount of people there, their demeanour, room behind the post office counter etc. I would then either observe proceedings or leave the office to get out of the way. My intention at that point would have been to let the auditors get on with the audit until they had finished. I would not take part or assist in the audit in any way, as that was not my role.

52. Though not always, many times, using the process described in the preceding paragraphs it was the Subpostmaster whom I felt I had reasonable grounds to suspect may have committed a criminal offence.
53. Investigators, in such circumstances, were encouraged by POL Security to gather evidence by way of an early interview of the suspect. As such I would invite the subpostmaster to give an early account of the circumstances as to why their office was found to be short.
54. In order to do this, I would invite the person suspected to an interview and explain the circumstances of the interview. I would explain that they were suspected of committing a criminal offence. We carried portable interview tape recorders and copies of the Police and Criminal Evidence Act codes of practice, and the interviews were carried out on the premises or in the home of the subpostmaster, (though always somewhere private).
55. Before commencing the interview, I would explain that during the interview they were entitled to have a solicitor present should they wish and also they could have a 'Post Office friend' present which could be the local National Federation of Subpostmasters representative or other official of the recognised union for the grade/position that they were.
56. The interview was always voluntary. Present always was the lead investigator and another investigator who was the support (second) officer.
57. I tended to use a script in order to ensure that I accurately covered off the criminal caution and suspect's legal rights once the interview tapes were running. Sometimes solicitors would attend, or arrangements would be made to postpone the interview until a time a solicitor was available,

however my experience was that in the majority of interviews the suspect chose not to have a solicitor present. I would not give the suspect any advice in regard to whether they had a solicitor or not.

58. Similarly, sometimes the local representative of the National Federation of Subpostmasters attended and sat in on the interview. Whomever was or wasn't present it did not affect how I undertook the interview.
59. In the interview I attempted to obtain evidence in regard to the circumstances of the loss and gather any relevant evidence which had a bearing on the investigation. I would present the suspect with what was known at that time and the tapes would record their evidence. I'd ask for an initial account of why the auditors had found such a discrepancy and if appropriate challenge the answers given.
60. After the interview, its content would be reviewed, and reasonable lines of inquiry identified and investigated further before the case and evidence were submitted for a charging decision. I recall that we were bound by timescales for completion of a casefile, and though I can't recall the specific timescale I seem to remember it may have been two weeks or thereabouts from interview to the expected date that the file was submitted for charging advice.
61. The second reason I would have attended a Post Office was if I'd asked the auditors to attend a particular post office as it was under investigation. In order to gather evidence, I may have required an audit of the Post Office accounts.
62. If this was the case I would schedule the audit for the morning after the office had produced a balance and arrange for the audit team and

members of the investigation team to meet somewhere close to the post office beforehand in readiness to attend the post office before it opened for business the following day.

63. In such cases I would have briefed the audit team as to any suspicions I may have had in regard to potential places of discrepancy within the post office account.
64. Once at the post office I would introduce myself, other investigators, and members of the audit team. I would tell the subpostmaster, or person in charge, that I had called the audit of the office and ask that they give the auditor their attention for the time being and I would speak with them at the end of the audit.
65. Again, I would not take part in the auditing process at all, but once the audit was completed, the process for interviewing a suspect, if necessary, tended to be the same as noted in the previous paragraphs.
66. Other than the identification of potential suspect(s) I was not involved in further decision making beyond reporting my findings whilst at the post office. If anything of significance happened whilst at the office I would try to inform my line manager and, if relevant, the Subpostmasters line management as they were the ones who would be making decisions regarding the provision of service to the public from the affected post office branch.
67. Furthermore, in terms of later decision making, I believed my role to be one of evidence gatherer. I was not involved in decision making in regard to criminal charges, prosecution, or accepting a plea at court. I was not aware of any test which may have been used, or what legal advice was

available to people making such decisions. I presented the evidence I had gathered from various sources, provided some analysis of that evidence in my report, and sent it off to others for further decision making. I had no 'final say' in what happened with the case.

68. Neither was I involved in the termination or not, of subpostmasters contracts. I recall that on completion of an interview, and submission of a case file I would have to provide a 'discipline' report which essentially was the report that I had produced for the prosecution decision but with just the facts detailed, and no unsubstantiated observations. The contracts manager then made their decision on contract issues using this discipline report and whatever else they wished to use.
69. Towards the end of my time with POL security it encouraged used of the Proceeds of Crime Act in order to recoup losses. Most of the work done in respect of this was by POL's in house Financial Investigators who would pursue this aspect of cases. Practically for investigators such as me it would mean such things as completing an authority signed by the account holder for the release of information from their bank, through to performing a search when attending the subpostoffice in order to identify possible assets, bank accounts, property, and the like.
70. Such searches were always performed with the signed written consent of the suspect and documented accordingly.

INSTRUCTIONS/ GUIDANCE GIVEN TO INVESTIGATORS

71. In respect of the Casework Management Document (version 1.0, March 2000), (POL00104747) and Casework Management Document (version

4.0, October 2002), (POL00104777), I do not recall being provided with either document.

72. My understanding of the 2000 guidance on page 2, at the second, third, and fourth bullet points is that POL Lawyers would have the ultimate say on disclosure. Secondly, that as an organisation, within disclosure, care should be taken as evidence and unused material may contain perhaps commercially sensitive information that should not be in the public domain. An example of which, and relevant at the time the guidelines were produced, was the Benefits Agency and POL processes for payment and checking of benefits payments through a post office. This was commercially sensitive and perhaps should not have been in the public domain. This sort of thing, I feel is what the phrase within the guidance 'maintaining good industrial relations' perhaps refers to. POL provided services and an access point for many secure products and services, and I feel that the guidelines refer to consideration of this when taking cases through court.
73. I do not however feel that this was relevant to its commercial relationship with Fujitsu in respect of any known bugs, failures, or glitches in the Horizon system. I strongly feel that these should have been disclosed at as soon as they were known of.
74. In regard to case file compliance, from the outset of my time investigating for POSIS compliance in regard to cases which would require a prosecution decision was strongly advocated by POL Legal Services and senior members of staff.

75. My understand was that these files should be complaint as they presented the evidence for consideration of criminal offences and were the basis of cases which may end up being progressed through the criminal courts. Compliance ensured that required information was set out in the files uniformly across POL, and Royal Mail, and that particular items within the file were in a common place where they could be routinely found by others processing the file.
76. Towards the end of my time with POL I recall there being a push on compliance, I do not specifically recall the precise reason, and I do not recall being involved in the development or introduction of the process, however I can only think that compliance in respect of files submitted for prosecution decision may have slipped to an unacceptable level, bringing in this renewed push.
77. I recall that in this process a compliance check list was sent out and files were scored against the check list by a compliance manager, whom I recall to be Ged Harbinson at the time. Mr Harbinson would score the file and would send the file back to the investigator if it did not attain the required compliance percentage score. I recall that the investigators line manager would also be copied in to Mr Harbinson's findings. I do not now recall what the required score compliance percentage score was.
78. In regard to my understanding of Para 2.15 of Guide to the Preparation and Layout of investigation Red Label Case Files, (POL00118101) I would say that any failing of the types identified in the document should be drawn to the attention of the prosecution decision maker in the report by the investigation manager highlighting them in bold type.

79. Similarly, should a matter be progressed through the criminal courts it would be reasonable to expect that matters highlighted in this way would be included on the relevant disclosure schedule. If there was evidence of Horizon system bugs errors or defects I feel that this evidence would clearly be relevant to the case and would pass the disclosure test in that it would be reasonably considered capable of undermining the prosecution case or assisting the defence.
80. Moving to my consideration of the document 'Identification Codes' (POL00118104). I was not involved in drafting that document nor have any idea who did. I don't recall seeing that document prior to its recent inclusion in the public inquiry documents. Many of the terms used in that document appear to me to be offensive and outdated.
81. I recall as an investigator being required to include identity codes in casework reporting and always believed it to be a requirement of POL or Royal Mail Groups obligations as a non-police criminal investigation body in recording of crime data and statistics to the police. We were also asked to provide antecedent information about suspects which I viewed in the same way as a form of ancillary information we were required to obtain for an outside party.
82. I recall that in order to provide the identity code information required for reporting there was a document I used listing established Police 'IC' codes, but that document was not POL00118104, nor did it contain the terms listed in POL00118104.
83. I recall that in order to provide that information, after an interview I would tell the interviewee that I had some administration tasks to complete and

ask some basic antecedent questions. I would show them the document I used listing the codes or go through its contents verbally and ask them what they considered themselves to be from the list of Police IC codes. I would then record their answer for use in the report.

84. It is difficult to state what analysis was done by investigators of Horizon data when someone attributed a shortage to Horizon. It depended on what had been said during the interview. If someone had stated that a loss had just appeared and offered nothing else, it was difficult to begin to find a place to start any analysis.
85. I can't specifically recall the steps I would have taken but if the subpostmaster could provide any relevant information about the loss being as a result of a particular product, or transaction, then I feel that some analysis would have been done in the area named.
86. In regard to analysis, I always viewed that my personal role was not to provide intricate analysis of systems and usually I would ask someone better qualified, perhaps a representative of a particular product within the National Business Support Centre, a POL security analyst, or on occasions Fujitsu representative to perform analysis.
87. I would do some basic analysis such as comparing cash on hand figures from previous cash accounts or declarations, examination of error notices, looking at transaction corrections, or when it was relevant, physically counting pension and allowance dockets against the declaration and the like, but beyond this level of analysis I recall that I would tend to seek expertise from elsewhere. If required I would then ask that this evidence was presented in a statement.

88. I recall that early on after Horizon was introduced we had to send away for Horizon information though I can't recall who would provide it. However, towards the end of my time at POL, remote access to Horizon information via a portal on our computers was introduced where information could be downloaded directly to us.
89. Through my career with POL, I did not hold positions where I was privy to the contractual arrangements between POL and Fujitsu.
90. I cannot recall arrangements between POL and Fujitsu in respect of the provision of ARQ requests, though I do not feel that they were provided as a matter of course for losses attributed to an unexplained Horizon shortage. I vaguely recall also that Fujitsu may have charged POL for provision of some ARQ information after a certain number of requests, however I don't not recall what the number of requests before that cost began. Also, I don't recall that I ever consciously considered this in any ARQ request I might have made.
91. I recall that ARQ data might be required if a case was committed for trial following a 'not guilty' plea at magistrates court. It may have been requested at this stage perhaps by the reviewing lawyer in their advice. If this ARQ data was part of the evidence then I feel that it would be disclosed to the Subpostmaster's legal team at the relevant point prior to the trial as part of the evidence.
92. That said I feel that in investigating cases, if it sufficed, I often would be satisfied with a 'catch all' statement to say that that the Horizon system was in good working at the time and did not throw up anomalies. If then

directed to obtain something in more detail by Legal Services I would go ahead and obtain whatever they had requested.

93. In regard to contact with individual Fujitsu personnel I recall that requests in to Fujitsu from POL security were facilitated initially by a single point of contact. From reading documents provided I remember from my time with POL, Andy Dunks being a representative of Fujitsu who would be called on to assist in prosecutions, however beyond this I cannot recall any other Fujitsu employee name.
94. I am aware of Gareth Jenkins name, but again this would be through the documentation provided by the inquiry. I do not recall any specific dealings I had with him or if he gave evidence to support any investigation or prosecution I was part of whilst working for POL.

RELATIONSHIP WITH OTHERS

95. I recall dealing with Cartwright King Solicitors in their role as a prosecuting agent of POL in the midlands area. I think they prosecuted a case I had taken over after an investigator in the Midlands had left POL. This case was prosecuted through Birmingham Magistrates court, and I cannot recall anything about it other than this. That, I believe, was my only interaction with Cartwright King.
96. As touched on earlier in my statement, I had regular engagement on a one-to-one level with local representatives of the National Federation of Subpostmasters when they represented their members in criminal interviews that I was part of.
97. Their reps regularly sat in on interviews involving federation members. Quite often they would speak with their members beforehand and/or

during a break in the interview. I never promoted or facilitated these meetings, however I did not object to them taking place if they and the suspect wished to confer.

98. I was never present during these exchanges and would always excuse myself from the room or let them use another room if available until their private conversation was over. Following this, on restart of the interview I would explain on tape what had happened in the interview break and resume the interview.

POL v Lee Castleton

99. From memory I do not recall any involvement with events surrounding Lee Castleton. The documents I have been asked to consider Marine Drive Post Office Summary of Events, (LCAS0000699), Audit report Marine Drive Post Office, (POL00082391_004), Letter from Cath Oglesby confirming Mr Castleton's suspension, (POL0082391_002), and witness statement of Cath Oglesby (LCAS0000609) indicate that I spoke with Catherine Oglesby in regard to shortages Mr Castleton was experiencing at the Marine Drive post office in early 2004.
100. It looks like Ms Oglesby contacted me for advice, and I told her that, as Mr Castleton had engaged with retail line management from an early stage, declaring losses to her, and working alongside her to establish a cause for the losses, I felt this was not a matter for criminal investigation.
101. As said I do not recall this exchange, but it appears consistent with advice which I may have given.
102. Based on what is contained within the provided documents, if this information was disclosed to me by Ms Oglesby at the time I feel that my

decision would have been based on the fact that as soon as things appeared to have begun to go awry in the accounts of his Subpostoffice Mr Castleton immediately contacted his line manager, gave full disclosure of events, invited her scrutiny, and began an open dialogue with her in order to attempt to resolve the issue.

103. In doing so it appears that there was no 'mens rea' or 'actus reus' in respect of his actions, and this is what I may have explained to Ms Oglesby at the time leading to her report of our conversation.
104. In respect of the conduct of this situation, from the reports provided it appears that Ms Oglesby explored Mr Castleton's reasons for the shortages in his branch and attempted to work with him. She put in measures to try to establish the cause of the losses and if another subpostmasters using the same hardware would experience the same results. When that didn't happen, and I am presuming Ms Oglesby was in receipt of the conventional thinking of the time within POL that Horizon was robust and infallible, her decisions and actions appear reasonable on the balance of probabilities, under the known circumstances at the time.
105. Concerns I have about the conduct of this matter now are that the Horizon system was not robust, nor infallible so Mr Castleton's claims of spurious transactions were sadly not believed, and he and his family suffered tremendously as a result.

PROSECUTION OF ALLISON HENDERSON

106. From memory I have little recollection of the prosecution of Allison Henderson other than I recall travelling to Norwich with Christopher Knight towards the end of my time with POL in order to assist as support officer

during an interview with a subpostmaster. On reading the supporting documents provided by the inquiry, I can state that: -

107. I may have been aware of the case through general chat in the investigation office in Chesterfield where we were all based. Mr Knight was the lead officer for this case and would have probably asked the other investigators present in the office to assist in his interview of Ms Henderson.
108. I don't specifically recall the event but presumably Mr Knight would have made the decision to interview Ms Henderson as it was normally the lead investigators decision to do so.
109. I would have volunteered to support him for no other reason than I had time in my schedule. I don't think I would have been directed by supervision to assist Mr Knight, nor do I feel that it was it felt I was any more qualified or experienced to deal with the matter than anyone else. It would have been simply that I was free to do it.
110. As support officer in the interview (sometimes called second officer), my role was to support the lead officer on the day, and particularly in the interview. I don't recall a specific remit for support officer, but they may be called upon to set up the interview equipment, perform introductions in the interview, cover certain points or subjects within an interview, monitor the tape recordings and timings, take notes if required, basically anything that the lead investigator instructed them to do. Different lead investigators asked different things of their support officer and I don't specifically recall anything Mr Knight asked of me.

111. Prior to the interview with Ms Henderson, I do not recall being involved in the case at all. That said, generally the lead officer and support office would have a briefing of some kind beforehand in regard to an interview, and I would imagine that this happened, however I do not specifically recall it.
112. I do not recall was said in the interview at all however I do not dispute what is detailed about the interview in the Investigation Report (POL00047152) Witness statement of Christopher Knight (POL00055458) or Record of the Taped Interview Summary (POL0054407)
113. During the interview I don't recall what was shown to Ms Henderson, however I do not dispute the record of POL0054407 and Investigation POL0047152 both of which were written closer to the interview date and both of which detail items shown to her. That said, with POL0054407 being only a summary of the interview I cannot say if what is listed on there is absolutely everything shown, or not.
114. In respect of Ms Henderson's allegations about the reliability of the Horizon system, to the best of my knowledge I was not aware of any issues brought up by her beyond what is report in the aforementioned documents. Also, again to the best of my knowledge I was not involved in any decision making in respect of Ms Henderson, nor did I have further involvement in this case.
115. In regard to the investigation of this case appears to be the same as other cases from around that time and taken forward based on what was accepted at the time. The way it appears to have been investigated and prosecuted does not differ from many others from that period. Based on

the evidence at the time, false accounting charges were admitted with no evidence offered on other charges. Following the discovery that the Horizon system was not robust and accurate this case, as with others, has subsequently been overturned or quashed. I fully support this course of action and express regret at the treatment Ms Henderson and her family experienced from POL as a result of these events.

PROSECUTION OF ALISON HALL

116. Similarly, to my comments in regard to the prosecution of Alison Henderson, from memory I have little recollection of the prosecution of Allison Hall. I recall travelling to a solicitors office in Cleckheaton with Christopher Knight in order to assist as support officer during an interview with a subpostmasters but little else.
117. On reading the supporting documents provided by the inquiry, I can state that Mr Knight may have asked me, or I may have volunteered to attend as his support officer, I do not believe I was attached to the case through any particular knowledge or perceived expertise that could be specifically useful in the matter.
118. I do not recall being involved in the case at all beyond my attendance as support officer in the interview. Normally the lead officer in the case makes the decision on who to interview, so I would surmise that Mr Knight made the decision to interview Ms Hall.
119. Again, I do not particularly recall the interview, nor what was shown to Ms Hall during it however, I do not dispute the transcript of interview on 28 September 2010 (POL00021252), Investigation Report (POL00091037) and List of Exhibits (POL00091065) which details such items.

120. In respect of Ms Hall's allegations about the reliability of the Horizon system, to the best of my knowledge I was not aware of these at the time. Also, again to the best of my knowledge I was not involved in any decision making in respect of Ms Henderson, nor did I have further involvement in this case, beyond making the statement shown at page 13 of the Witness List (POL000911149) which I would imagine Mr Knight would have asked me to provide.
121. Considering paragraph 12 of Alison Hall's Statement (WITN01450100) I would observe that I cannot recall being present at an interview with Ms Hall, Sue Muddeman and Mr Knight at Leeds Post Office headquarters and the investigation team would not normally attend meetings such as the one described. The interview Mr Knight and I undertook with Ms Hall was recorded and documented in POL00021252 at her solicitors office, and can only feel that Ms Hall may be mistaken in respect of the attendance of Mr Knight and I.
122. In regard to the investigation of this case appears to be the same as other cases from around that time and taken forward based on what was accepted at the time in regard to the Horizon system. The way it appears to have been investigated and prosecuted does not differ from many others from that period. Evidence relating to False accounting charges at the time was admitted, with no evidence offered on other charges of theft and the like.
123. Following the discovery that the Horizon system was not robust and accurate, convictions from this case, as with others, have rightly been quashed, and once again I fully support this course of action. As with Ms

Henderson and indeed all persons affected I express regret at the treatment Ms Hall and her family experienced from POL as a result of these events.

Prosecution of David Blakey

124. Due to the length of time since these matters my recollection is limited. However, from memory and examination of the provided documents relating to this matter I can state:-
125. The document Investigation report dated 25th May 2004 (POL00044818) describes the circumstances in which I first became involved in Mr Blakey's case. My role was that of officer in the case, or lead investigator in the case, and to the best of my knowledge I don't recall any involvement with the case prior to the phone call I received on the morning of 13 May 2004.
126. I attended Riby Square post office that morning, as, based on what I'd been told, I suspected a criminal offence may have taken place and it was part of the remit of my job to investigate this matter.
127. I do not specifically recall the content of any conversations with the auditors that morning beyond what is reported in POL00044818.
128. I would have made the decision to interview David Blakey more than likely based on information I had received from the auditors, namely the anomalies in the accounting at the subpostoffice, and the brief statement Mr Blakey had provided to them that morning where he admits to knowing of the loses, and covering them up in the accounts. It appeared to me that a criminal offence had been committed and I had reasonable grounds to suspect Mr Blakey of committing it.

129. Though I cannot specifically recall what documentation I considered before interviewing Mr Blakey it would appear from POL00044818 that I considered previous cash accounts, and the written statement which Mr Blakey had given to the auditors that morning.
130. I am content that the records of Mr Blakey's interviews on 13 May 2004 (POL00044830 and POL00044831) detail what documents were shown to Mr Blakey in his interview. I have no recollection beyond this.
131. I was not aware of specific allegations made by Mr Blakey relating to the reliability of the Horizon system. During his interview Mr Blakey said that losses at Roby Square had been steadily climbing and he was unaware of a specific reason, but he had been covering up the losses in the office accounts that had been submitted to POL. As far as I recall, he did not directly call into question the reliability of the Horizon system at that time.
132. As documented in POL00044818 and the Summary of Key Points from an interview with Gillian Blakey (POL0044830) Along with Helen Dickinson, Investigation manager, I interviewed Gillian Blakey immediately after interviewing Mr Blakey. I cannot recall specifics of the interview, and do not recall anything further than that detailed in POL0044830, but I have no reason to question the details of the interview contained in those documents.
133. I do not recall interviewing Shirley Blakey however POL0044830 indicates that on 24 May 2004 Helen Dickinson and I spoke with her. I am content that what is reported reflects the content of the interview.
134. Similarly, I have vague recollections of conducting interviews with other Riby Square staff during the course of the investigation, however I cannot

recall specific details of what was discussed. These interviews are reported and summarised in POL0044830, and I have no reason to question the information contained within the report.

135. As detailed in POL0044830 I made enquiries in to Mr Blakey's finances in order to investigate a line of inquiry in respect of his recent financial position. I was investigating what I thought at the time to be a significant loss of money from POL and perhaps felt it reasonable to approach his bank for information.

136. I cannot recall if I made enquiries at Grimsby Police Station in regard to Mr Blakey case. Occasionally enquiries would be made with the police for all sorts of reasons, but without further information in respect of this case I would not know if the police in Grimsby were approached.

137. I am unable to say if ARQ logs were sought in this case. I do not remember making the request or not making the request. At the time, I do not think it was a matter of course to request them in cases such as this. Nor were we as investigators instructed to obtain them in pursuing prosecutions. At the time, and 2004 was shortly after the full roll out of Horizon, I and other investigators believed that Horizon was robust. This is what we had been told and continued to be told. The certainty of the message from POL in this regard may have coloured our judgement in matters surrounding Horizon.

138. I cannot recall any further involvement I had with Mr Blakey's case prior to the decision to charge him and was not involved at all in that decision.

139. Regarding disclosure, without really knowing it I was the disclosure officer in the case. Within POL investigations, if you were the officer in the case,

you were also, disclosure officer, exhibits officer, report writer, witness liaison, and all the other roles combined to support an investigation. As such, when it came time to review evidence and produce disclosure schedules for a criminal prosecution it was down to each investigator to do this.

140. An issue with that I feel there was, was that there was no regular refresher training on the subject, often the line managers were equally as poorly equipped to deal with disclosure, and because as POL cases were rarely committed for trial, consideration and production of schedules was something that investigators rarely did. I can recall in my time at POL investigators with substantial service who had never assembled what was known as a 'committal file' and therefore had never produced disclosure schedules.
141. To expand, obviously rules in respect of this have now changed, however in the past POL would charge a person for example with theft and they would appear at magistrates' court for a first hearing. Invariably, because of the amounts of money involved the magistrates would send the case to crown court to be dealt with there. At this point, ordinarily, all that an investigator had submitted by way of reporting was whatever was in the file that had initially submitted at the end of the investigation when it had been reported to the designated prosecution manager and Legal Services.
142. If the defendant pleaded not guilty and the matter was sent for trial it was only at this point that a full file, (which was known within POL investigation as a 'committal file') was assembled.

143. Many of POL's cases attracted a guilty plea so committal files were not deemed necessary and not produced, and as such I feel that performance in respect of tasks involved in producing a committal file, such as disclosure, may have suffered.
144. Looking at the date of Mr Blakey's prosecution, I would not be surprised to learn that in regard to my time with POL this may have been the first time that I had put together a 'committal file' and produced Disclosure Schedules.
145. I recall that my technique to deal with disclosure at the time was to assign each case I was working on a plastic box container that I would keep in a locked cupboard in my office. As files were paper based at that time, any relevant item from the case I would deposit in this container, if necessary having firstly printed it off from a computer. When instructed to assemble a 'committal file' I would then simply go through the items in the box and list as I saw fit.
146. Though I cannot specifically recall undertaking the exercise for Mr Blakey's prosecution I believe I would have approached disclosure in this way and produced the Draft Schedule of Non-Sensitive Unused material (POL00044817) using this process.
147. This, along with other documents (witness list and copies of statements, exhibit list and copies of exhibits etc.) would then have been sent to legal services for review by the reviewing lawyer. Unfortunately, I don't know in this case who the reviewing lawyer was, Jarnail Singh looked to have held the case for legal services, but do not know if it was he who was actually the reviewing lawyer.

148. On reflection I feel my lack of training and or experience in disclosure is evident in document POL00044817, with the descriptions being particularly poor. Under those circumstances I am as confident as I can be that I fulfilled my remit in that all items that had been gathered as unused evidence in the case were considered and documented accordingly, and that what I produced in terms of schedules for review was accurate. However I feel that if I was to do the disclosure exercise in respect of this case again, or if a more experienced disclosure officer would have done the exercise at the time, it may have produced different results. Also, I do not recall that the reviewing lawyer ever questioned my disclosure schedules.
149. Via Jarnail Singh's memo to S&A casework dated 23 June 2004 (POL00044835) I would have been notified of the prosecution decision in respect of Mr Blakey however, I had no input into the process other than perhaps to perform any of the tasks identified by Mr Singh on the document to support the prosecution, though I cannot specifically recall doing any of these. It was also my responsibility to lay the information at court in order to obtain summons, and I would have used the information from the document POL00044835 to assist in this.
150. In respect of the prosecution decision, at the time, I probably would have felt that it was a fair reflection of the evidence that had been presented in the investigation.
151. I do not recall any further involvement I had in this case. I would have probably served summons on Mr Blakey. I would have then attended court hearings as the officer in the case to support POL's local

prosecution agent as it was common practise for POL investigators to do so at the time.

152. Reflecting on the investigation and prosecution of Mr Blakey knowing what I know now, I express regret at the treatment Mr Blakey and his family experienced as a result of these events but offer the following by way of explanation for my actions.
153. My role as an investigator was to gather evidence to investigate the loss. From the outset, after his confession firstly to auditors, and then within his interview, Mr Blakey admitted that he was fully aware that cash was missing from the post office and that it had been for some weeks. However instead of raising the alarm to POL he had falsified accounts to disguise the fact. I accept that he said he wanted to shield his wife from events, but I did not think this was reasonable course of action as the losses continued to mount up to the figure they stood at when the auditors arrived at Riby Square post office that morning.
154. Early in his interview, under caution, Mr Blakey had admitted that he was fully aware of the amount of cash shortage that the auditors had found that morning, he had covered these losses up, and in entering inflated figures into the account to make a balance, he had known his actions were dishonest. I feel that it may have been these admissions of dishonesty which led me to subsequently diminish and dismiss his claims that he was unaware of how the losses had occurred in the first place.
155. I accept that within his interview Mr Blakey repeatedly denied having any responsibility for the losses, however as an investigator in such circumstances I felt that it was reasonable for such an account to face

challenge. As Mr Blakey offered no explanation to me that would allow focused scrutiny of a particular area of loss within the account, as the person who was admitting covering it up I felt it reasonable to explore possibilities that he had taken it. Mr Blakey had admitted means and opportunity in respect of the loss and I felt it reasonable and appropriate to explore a motive.

156. At this time, when I challenged Mr Blakey saying that I didn't believe his explanation, I note that he actually told me that he didn't know if he believed it himself. That said, he did continue to stress that his explanation, that the losses appeared out of nowhere, was the truth.
157. After the interview I felt that I took relevant and suitable steps to progress the case. I made appropriate inquiries with other people who had access to cash and stock and gathered further evidence from witnesses. Of course, all of this was within a narrative that I and others had at the time where it was unquestionably believed within POL that the Horizon system was not capable of producing an unexplained loss within a post office. It was normal at this time to obtain a statement to say as such, however I have not seen such a statement within documents disclosed to me at this time. Perhaps with Mr Blakey's case not going to trial this may not have been obtained.
158. On reflection I recognise that it must have been extremely distressing for Mr Blakey and his family to hear my dismissal of his now known to be truthful explanation, but at that time in my experience of investigating previous criminal losses for POL more often than not the person covering the loss up in the accounts was found to be the perpetrator of the loss.

Furthermore, often the motive or motives for the person taking the cash were ones similar to the reasons that I put to Mr Blakey when challenging his account. Again, on reflection, perhaps this bias, albeit unconsciously, may have been in play as I investigated the incident.

GENERAL

159. It was my honestly held belief during the time I was investigating within POL that Horizon was robust and would not erroneously produce spontaneous transactions that were not genuine. That was the over riding narrative that I was being told and accepted.
160. In order to support our work, I (and other investigators I worked alongside) obtained Section 9 statements from people who were considered Horizon experts. In each case their evidence reported that the system was accurate. This was the bedrock of any POL investigation and I took those statements at face value when gathering evidence in my cases. However, as briefly mentioned in the preceding paragraph, this may have clouded, not only my judgment and objectivity, but also potentially that of other POL staff, lawyers, legal advocates, and jury members.
161. I left POL around the first week of 2012 and at that time I do not believe I was aware of any successful challenge to Horizon data. I feel that if there had been one, it would have opened the door to numerous other challenges and POL's position in respect of demonstrating the criminal burden of proof to a court that the Horizon system had integrity would have rightly been made untenable. Unfortunately, this did not happen.
162. I am unaware of what POL's investigation in to 'bug and errors' in the system was, or if it was deemed sufficient. From an investigators point of

view, when required I simply asked the question of those who should have known and was always told that the Horizon system was robust.

163. Throughout my time with POL, I was not privy to information which Fujitsu provided to POL about the operating status of Horizon beyond the content of statements as detailed in the preceding paragraphs.

164. If anyone within POL or Fujitsu knew that the integrity of the Horizon system was questionable I feel that this information should have been provided to the Investigation team without delay. The information obviously would have majorly impacted any investigation that was being carried out and completely undermined any criminal or civil proceedings POL had undertaken, since the roll out of the system.

165. From a personal viewpoint, on reflection I feel that there was an amount of complacency from POL and others in the investigation and prosecution of these matters. A similar situation appeared to be regularly played out as cases progressed through to conclusion.

166. Quite often, as has been evident in some of the cases commented on in my statement, false accounting was admitted at interview against a backdrop of the suspect stating they were not aware of the origin of the loss.

167. Charges were then brought for the admitted false accounting, with an associated theft charge for the amount of loss.

168. During prosecution, at an early-stage POL appeared keen to take a plea deal where the false accounting charges were admitted, with the theft charge not being taken forward. This meant that the evidence in respect of the theft charge was not tested in court. Often, when it was taken to

trial, the defendant was acquitted of theft, however within the same proceedings they were still convicted of false accounting as following an admission in interview, evidence of that offence was compelling.

169. Being convicted of any criminal charge would mean that a subpostmasters contract was terminated, and their contract said they were liable for any losses, so POL were able to dismiss the Subpostmaster and recoup their perceived loss without evidence of the robustness of the Horizon system ever being truly tested.
170. I feel that POL were content to secure a conviction of anything, as a means to an end to achieve this. I feel that complacency may have set in and negotiation within indictments was widely accepted.
171. Reflecting on my personal performance during this time I would say that in comparing the cases I investigated pre-Horizon and those post Horizon rollout I did not notice a significant increase in the audit shortage type cases.
172. Though I was not aware of the whole picture in regard to how many cases of a similar nature were being pursued by POL, I do not recall any significant increase in this type of investigation in the period after Horizon system implementation to that which I experienced before the system roll out. This may have affected my thinking in respect of my investigations, as if I had have noticed a sharp increase in cases after the implementation of Horizon it may have raised my suspicions that the Horizon system was not performing as it should have.
173. The thought that during my time with POL someone within the organisation may have had knowledge that the Horizon system was

flawed and did not disclose this information as they should, does not sit well with me. Particularly knowing that investigations and prosecutions continued which they must have realised were unsafe as a consequence.

174. I feel anger that under these circumstances, through my investigations I may have been used as an unwitting instrument of POL and Fujitsu to perpetuate the myth that Horizon was faultless and brought unnecessary distress and anguish to innocent people.

STATEMENT OF TRUTH

I believe the content of this statement to be true.

Signature of the witness:

GRO

Date of Signature: 08 October 2023

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<u>No</u>	<u>URN</u>	<u>Document Description</u>	<u>Control Number</u>
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2	POL00105191	Activity Plan for POL separation project – Criminal Investigations Policy	POL-0080816
4	POL00104747	Casework Management Document (version 1.0, March 2000)	POL-0080387
5	POL00104777	Casework Management Document (version 4.0, October 2002)	POL-0080417
6	POL00118101	Guide to the Preparation and Layout of investigation Red Label Case Files	VIS00012690
7	POL00118104	Identification Codes	VIS00012693
8	LCAS0000699	Marine Drive Post Office Summary of Events	VIS00010939
9	POL00082391_004	Audit report Marine Drive Post Office	POL-0078954_172

10	POL00082391_002	Letter from Cath Oglesby confirming Mr Castleton's suspension	POL-0078954_170
11	LCAS0000609	Witness statement of Cath Oglesby	VIS00010849
12	POL00047152	Investigation Report	POL-0043631
13	POL00055458	Witness statement of Christopher Knight	POL-0051937
14	POL00054407	Record of the Taped Interview Summary	POL-0050886
15	POL00021252	transcript of interview on 28 September 2010	POL-0014444
16	POL00091037	Investigation Report	POL-0090681
17	POL00091065	List of Exhibits	POL-0090709
18	POL00091149	Witness List	POL-0090793
19	WITN01450100	Alison Hall's Statement	WITN01450100
20	POL00044818	Investigation report dated 25 th May 2004	POL-0041297
21	POL00044830 and POL00044831	Mr Blakey's interviews on 13 May 2004	POL-0041309 and POL-0041310
22	POL00044829	Summary of Key Points from an interview with Gillian Blakey	POL-0041308
23	POL00044817	Draft Schedule of Non-Sensitive Unused material	POL-0041296

24	POL00044835	Jarnail Singh's memo to S&A casework dated 23 June 2004	POL-0041314
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