

Witness name: Christopher Granville Knight

Statement No: WITN08290100

Dated: 23 November 2023

POST OFFICE HORIZON IT INQUIRY

FIRST WITNESS STATEMENT OF CHRISTOPHER GRANVILLE KNIGHT

I, CHRISTOPHER GRANVILLE KNIGHT, will say as follows;

1. 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 23 October 2023 (the "Request").
2. I can confirm I was assisted by the Post Office (PO) in confirming insurance coverage for support in preparing my statement. I have also been assisted by DAC Beachcroft LLP in the preparation and drafting of my statement.

Background

3. I am a current employee of Post Office Limited (POL) having joined in January 1983. I have set out a summary of my career at POL including the positions I have held, the dates I held them and a brief description of what each role entailed:

- a. **Jan 1983 – April 1984** - Working for POL as a Postal Assistant grade in PO Stores Branch, located in a Head Post Office. I was responsible for distribution forms and stationery to Head Office departments that were located within the building and also to Crown Post Office branches within the geographical area.

- b. **April 1984 – 1987** – Working for POL as a Postal Officer grade on the Head Office Counter. This was pre-Horizon, or any other electronic/computer system, and was all manual paper-based transactions. I was responsible for serving customers with all Post Office transactions that were available at the time. We used to balance our own tills weekly.

- c. **1987 – 1993** – During this time the Post Office underwent a business restructure/change and Royal Mail Letters and Post Office Counters became two separate entities. I remained working for the Post Office as a Postal Officer grade working in the Cash Remittance Unit (CRU) in the Head Office building. The role involved processing business cash deposits and sending cash and stock (stamps) to PO branches within the catchment area of the Head Office. It also involved receiving cash and stock from PO branches within the catchment area of the Head Office.

- d. **1993 – 1997** – Working for Post Office Investigation Branch (POID) as a Postal Officer grade. I was predominately responsible for pre-

employment checks of staff applying to join Post Office, Royal Mail or Parcelforce by checking applications against a database of previously debarred staff as well as general admin duties.

- e. **1997 – 2000** – I applied and was promoted within POID to an Assistant Investigation Officer (AIO), a manager grade. I underwent the initial internal training, which I believe was three weeks, delivered by two experienced POID Investigators. This covered the process of investigating suspected criminal offences against Royal Mail (theft of mail). The role involved complying with the Police and Criminal Evidence Act (PACE). I used POID Investigative forms during investigations. The forms included: Friends at Interview, Legal Advice for Persons being Interviewed, Searches (person, car and property) and the Health & Safety and Treatment of Investigators and Suspects and Witnesses during an Investigation. There were a number of teams within POID at that time. After training I was assigned to one of these teams and an experienced Investigation Officer (IO), who was a grade above me, acted as my mentor. We investigated counterfeit/re-used postage stamps, usually by persons external to the business.

During this period (1997 – 2000) POID underwent a structure change and also changed its name to Post Office Security and Investigation Service (POSIS). I moved into a team investigating the theft of Special Delivery mail bags/items within the Royal Mail nationwide pipeline. We covered handover points within the network; railways stations, airports

and the Travelling Post Office (TPOs) trains. This team consisted of established Investigators and so was a good learning opportunity.

- f. **2000 – 2003** – Following a business re-organisation staff were given a preference exercise to select which business unit they would prefer to work in. Due to my experience of working in the Rem Unit (now known as Cash Centres) I opted to move to the newly formed business unit "Cash Handling & Distribution" that was an amalgamation of CashCo (the in-house Cash in Transit (CViT) service) and the Cash Centres. Back in those days the CViT used to service both Post Office branches and also small businesses collecting banking deposits from businesses and taking them to our Cash Centres to be processed and banked.

I was initially the lead investigator, conducting investigations into possible criminal offences involving CViT and cash centre staff, conducting PACE interviews and compiling case papers and files for prosecutions which were then submitted to PO Legal Team for advice. I would then obtain Summons' and attend Court as necessary. On occasions it was necessary for me to report the offences to the Police and liaise with them as required during their investigation providing specialist business knowledge.

The role soon became one of physical security as well as the team aligned to the current Security Managers. This was both security

equipment as well as processes and procedures within the CVIT and Cash Centre environments.

- g. **Approx 2003 – 2016** – I worked in POL with established investigators investigating possible criminal offences within the network. This related to both Directly Managed Branches (DMB), formerly known as Crown Branches, and also the branch network. I was responsible for conducting investigations and all that was involved, as mentioned in my previous roles as an AIO. This role was the same grade, just a different job title, Investigation Manager. There was also an element of physical security, again as mentioned previously.

2016 to date – Working in the Intelligence (Intel) Team within the Post Office Security Team. We are the point of contact for POL for Law enforcement. We have no involvement in internal investigations.

- 4. The Inquiry has asked me to provide details in relation to my positions as an Investigator, Investigation Manager and my role within the Fraud Team. These were slightly different titles for the same role but in different sections/functions of the business. The business has gone through numerous re-organisations of the reporting line and structure, but the role of 'investigator' remained predominantly the same as what I have set out below.
- 5. The Inquiry has asked me to provide further details in regard to my role as an Investigator within the Security Team. I became an Investigator in 1997 and

worked in the Post Office Investigation Department ("POID"). I undertook an in-house three-week training course (as I recall) that covered the Police & Criminal Evidence Act 1984 Codes of Practice ("PACE") and the relevant POID forms that were used during an investigation ensuring adherence to PACE. The forms included, but this is not an exhaustive list, the Explanation of a Person's Legal Rights, Witness Statements and Undertaking a Search.

6. The course also included training on report writing in the context of investigations, how to complete a tape transcription, the structure of case papers and the appendix envelopes associated at the rear of the case papers; Appendix 'A' – Witness Statements; Appendix 'B' – tape transcripts and evidential items; Appendix 'C' – Miscellaneous.

7. I recall that towards the end of 1999 I started an NVQ Level 4 in Investigation. I remember I started it while I was working in POID and then when I moved to CH&D in 2000, I continued with it but for some reason I did not finalise it even though I completed all of the sections. I think the assessor left the business.
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8. When I moved into CH&D (2000) there was a mandatory CViT crew training course to complete (1 week) in order to obtain a Security Industry Association (SIA) licence, a requirement to work in the CViT industry. There was also other training in security equipment; vehicles, security equipment and processes within both Cash Centres and CViT Depots.

9. When I moved to POL in 2004, I initially worked with established POL investigators. As far as I recall a lot of the investigations were regarding Pension & Allowance fraud. As I remember these cases were usually raised by the Department for Work and Pensions (DWP) and there was a lot of liaisons with their Fraud Team.

10. During this time, although I cannot recall exactly when, I attended Chesterfield future Walk building to receive counter training. The training would have given a basic understanding of Horizon i.e., how the system performed transactions, not data analysis. There was also a refresher course where we were tasked with working in the DMBs for 3 days during the Christmas period and again when we were tasked with covering strike action in the DMBs (possibly 2006-2008, I cannot recall exactly). We also received training on security equipment at various times when I was within POL as the role covered both investigative and physical security. I also recall Cartwright King giving specific training which covered notebook use, interviewing and disclosure to solicitors at interview.

11. The forms used as part of an investigation were numbered and prefixed by the relevant business unit. For example, the Legal Rights Form 001 was numbered; ID001, GS001, CS001 and POL001. My understanding/recollection of these codes being the Investigation Dept, Government Services, Corporate Security and Post Office Ltd.

12. My role was to investigate possible criminal offences within the specific business unit I was working in at the time. I was a manager by grade but did not have anyone working to me. I had a Line Manager who would have been the grade above me and who changed over the years and as I moved business units. The Line managers I can recall are Charlie Bint (POID), Danny Boles (POID), Chris Lawrence (CH&D), Manish Patel (POL), Lester Chine (POL), Keith Gilchrist (POL), Andrew Daley (POL), Alison Drake (POL), Helen Dickinson (POL).

13. I always found my colleagues to be professional and competent and never had any doubts about working with them. My Line Managers were again professional and competent. Some of my Line Managers had been investigators within the Royal Mail/POL whereas others may not have had internal investigative experience but had worked in law enforcement. Some had skills relevant to the business unit I was working in at the time. This would have been physical security and not investigative knowledge.

14. As an Investigator we did not cross into the discipline sphere, that would be either HR, a Senior Manager or in the case of the Network a Contract Manager.

15. As part of a criminal investigation there would be the general disclosure made by the Lead Investigator using the forms 006 (A, B, C & D). These would be verified by the Legal Team.

16. I was not involved in any Litigation Strategy. I would assume this would be done by much more senior people within the business.

17. I would liaise with other Post Office departments when progressing a case. This could be the Contract Team, HR and/or the Finance Service Centre, which had various teams within it e.g., the Lottery Team, Cheque team, Postal Order Team etc. I am sure there were other teams I liaised with, but I cannot recall them now.

The Security team's role in relation to criminal investigations and prosecutions

18. From what I can recall, the Head of Security was John Scott. Below him was his Lead Team which I think was Andy Hayward, Dave Pardoe, John Bigley and possibly others. They were responsible for ensuring the teams strategy remained in line with the business strategy. Below that there would be Team Leaders / Senior Managers then the Security / Investigation Managers and a small number of admin grade staff. There were Physical Security Managers and Investigators, and their roles did not cross at first. As I recall, as I had both Physical Security and Investigative knowledge, from my Cash handing and distribution CH&D days I would perform these functions when required as CH&D, which changed its name to Supply Chain when it came under POL, so we were their Security Team (both Physical Security and Investigative).

19. As the years moved on the Post Office had various re-organisations which affected other teams not just the Security Team. This usually meant a head count reduction. There was one re-organisation where everyone had to work

from a 'hub' (which were the main POL locations). I know this affected some staff and due to the hugely increased travelling distance they left the Security Team. Sometime after we had an intake of approximately six new members all recruited externally. I think this would have been around 2011 to 2013 but I cannot recall the exact dates.

20. The Inquiry has asked me to explain my role in the development and/or management of any policies within the security team. I can confirm that I did not have any involvement in the development or management of any policies, and this would have been done by more senior members in the team.

21. The Inquiry has also asked me what role I had in the development and/or management of any policies, taking into consideration POL00104909 (Separation Project – Criminal Investigations Policy for Post Office Ltd), POL00123309 (Email from Dave Posnett dated 09/07/2014) and POL00123310 (Royal Mail Group Security Investigation Communication 6-2014 – Joint investigation protocols RMGS and PO Ltd security), POL00123311 (RMG 2.2. Joint Investigation Protocols – RMGS and PO Ltd Security July 2014), POL00123312 (MOU on joint investigation protocols post independence involving Royal Mail and Post Office Ltd security) and POL00126976 (Email from Dave Posnett dated 11/09/2013), within POL post-separation. Again, I can confirm I did not have any involvement in the development or management of these policies, or any policies post separation other than POL0012243 which I am listed as author. That was something I was asked to create but it never came to fruition and so was never used.

22. The Inquiry has also asked me what legislation, policies and/or guidance governed the conduct of investigations conducted by the Security team during the period you worked within it. The Police and Criminal Evidence Act 1984 (PACE) was the main legislation as all our investigative forms were designed to adhere to this. The Regulation of Investigatory Powers Act (RIPA), which was for any CCTV, and the Criminal Procedure and Investigation Act (CPIA) were also key pieces of legislation.
23. The Inquiry has asked me what the process was for dealing with complaints about the conduct of an investigation by the Security Team. I not sure of the process or if there was one. I would expect if a SPM had an issue with an investigation, they would raise it with their contract manager or the National Federation of Sub Postmasters (NFSP) who would then follow up the issue with the senior management in the Security Team.
24. The Inquiry has asked me what supervision there was over criminal investigations conducted by Security Managers. From what I can recall between 2004 to 2007 senior managers would view case papers that were submitted for Legal Advice via our Casework Team and would add comments or give advice to the Investigator. I believe this then grew into the Case Compliance process. This was a check list setting out a list of actions to ensure everything had been completed correctly. In addition, during my latter years as an Investigator there was a monthly Cases on Hand meeting where Security Managers would provide updates on their cases and what actions were needed. The team leaders would discuss and come back with any recommendations. In

general, I could always ask my team leader or a peer for advice on a current investigation. But my memory of how things changed over the years is not complete.

25. As far as I can recall, the investigation and prosecution of SPMs, assistants and Crown Office employees was the same. I think that around 2011 or 2012 there was a change and SPM assistants were not prosecuted. Instead, the SPM was advised to report them to the Police. This would have come down from the Lead Team.

26. The Inquiry has asked me to review POL00123743 (Email from Elaine Spencer dated 31/07/2015) and POL00123840 (Email from John M Scott dated 20/01/2016). These documents are dated 2016 by which time I had moved to the Intel Team with my colleague Andrew Wise under Elaine Spencer. I was not involved in any investigations at this time and by then the appetite for prosecution had ceased as it had been slowing down from about 2013. As I recall any investigation cases on hand were being closed as NFA (No Further Action). I believe this was around the time of the Group Litigation Order. Cartwright King were the Solicitors at the time, instead of POL Legal Services which was just Jarnail Singh.

27. From what I recall, sometime between 2013 – 2016 (although I am unsure of the date), the investigators were told by John Scott that we would be prosecuting again once an SME (Subject Matter Expert) was found and had been appointed. This never came to fruition.

Audit and Investigation

28. In my experience an investigator would attend an audit with the auditors if the audit had been requested by the investigator as part of an investigation where a PM or branch staff would potentially need to be spoken to. Alternatively, an investigator may attend during an audit if this was a general scheduled audit, and a large loss was discovered. I believe that as part of the auditor's process they had to inform a number of people if a large loss was discovered in branch, one being the Security Team Leader for the geographical area of the branch. The investigator would not take an active part in the audit but would attend to understand the outcome and to follow up with an investigation if necessary.

29. In the early 2000s an investigator was more likely to get called to an audit to enable them to approach the SPM and/or staff and arrange further enquiries. In later years this approach diminished as auditors were instructed to write down any significant comments made by the SPM or staff. The auditors were trained in this and the fact that they should not solicit comments as they should not get into an interview scenario. This relates to adhering to PACE (Cautioning someone before they were asked or if they were starting to admit to a crime).

30. In order to determine if an investigation was to take place the information would be given to an investigator by the Team Leader. It is my understanding that the decision would be made if the loss reached a threshold (from memory I think this was £5,000) or there was suspected/admitted dishonesty. If the matter was being dealt with by the Contract Team and there was no suspected criminality an investigation case would not be raised.

31. In my experience the recovery of debt was not decided at the outset of an investigation. As above, if there was no criminal investigation the matter would have been dealt with by the Contracts Team and my understanding is that they would deal with the branch and any debt. This process was not part of the Investigation Team's remit.

32. Once a criminal investigation had been concluded the Legal Team would advise of any charges and if there would be a claim for compensation. I'm not sure when but at some point, the PACE was utilised when there was a conviction. I cannot recall when but over the years POL had some senior investigators (Ged Harbinson, Paul Southin, David Posnett, Graham Ward and Helen Dickinson) who underwent training to become accredited Financial Investigators. During the investigation of a case the decision as to what crime (Theft or False Accounting), if any, had been committed and the points to prove would have to be covered. The relevant information would be passed to the Legal Team who would have the final decision on whether a case should progress to court.

33. When I received a case for investigation, I would start by understanding the background including the audit result and why the audit had taken place. Usually, the branch was targeted for audit as the branch had come to the attention of the Branch Analysis Team (BAT) due to anomalies or concerns. For example, this may be because the branch had not returned cash when asked to do so or had completed suspicious transactions such as a large

number of reversals or excess spoiled postage. I would also obtain the last 3 months of Credence data to view the updated data in relation to concerns raised by BAT. If necessary, further archive data may have been needed via the ARQ process.

34. I would also obtain a Police National Computer (PNC) person check and a credit check. The PNC would be used to complete the Planned Operation Risk Assessment (PORA) for when a suspect is to be approached and a location is due to be visited.

35. I would speak to the relevant Contracts Manager to ensure they know I am dealing with the case and the point of contact should we need to update each other. As the investigation progressed engagement with the Financial Investigator (FI) may be required dependant on the case.

36. Once the interview had been conducted, I would seek Legal Advice on what further action was required. For example, further interviews or statements may be needed where more information or clarification was required.

37. I would also arrange for Human Resource (HR) data to be provided giving me detail of the PM and any assistants, including their Horizon User IDs.

38. NBSC (Helpline) call logs were also requested to understand if the branch had been reporting issues that related to the enquiry.

39. Following the interview, we would ask for authority to obtain bank statements directly from their bank. Other financial details (loans, mortgage) would also be request at this time.

Decisions about prosecution and criminal enforcement proceedings

40. Once the investigator had concluded the investigation or got to a point where legal advice was needed, the case file would be passed to the Legal Team who would decide if a case was to be taken to Court. The Designated Authority Manager (DAM), a Senior member of the Security Team, would give the final consent to continue to prosecution. The Contract Manager would also be aware that a criminal investigation was taking place and would manage the contractual process. As far as I am aware, the Contract Manger did not have any input into the decision making but I do not have a full knowledge of their process.

41. The Inquiry has asked me what test was applied by those making prosecution and charging decisions and what factors were considered at the evidential and public interest stage. The evidential and public interest decision would have been made by the Legal Team. My understanding is there were two parts; was the evidence strong enough and was it in the public interest. Once the Legal Team had advised of the decision to prosecute, they would supply details of the offences to be charged to the Investigator by a memo added to the case papers which were returned to the Investigator.

42. The Inquiry has asked me to confirm the circumstances in which steps were taken to restrain a suspect's assets by criminal enforcement methods, such as confiscation proceedings, and when and who decided to pursue these methods.

The decision to restrain a suspect's assets by criminal enforcement methods would be made by the Financial Investigators. In later years they were notified at the start of investigations that had a large loss.

Training, instructions and guidance to investigators within the Security Team

43. Every interview regarding a criminal offence was governed by PACE. To that end every interview of this nature regardless of whether it was a SPM, SPM Assistant or Crown Employee suspected of a criminal offence would follow the same format. The interview process has been fundamentally the same since I had my initial training in 1997 to be an Investigator.

44. Since my initial training in 1997 there were a number of refresher/additional courses dealing with interviewing and taking statements. I don't recall exactly when these took place. I remember one piece of training which explained an interview strategy called TEDS PIE which is an acronym for 'Tell me, Explain to me, Describe to me, Show me, Precisely, In detail, Exactly.'

45. I recall, but cannot fully remember, that there was some specific training for taking witness statements, in addition to the original training I undertook in 1997. There were various models that were taught for example the 'Peace Model' and 'Pelt'. These acronyms stood for Plan, Engagement, Account (clarify and challenge), Closure, Evaluation and People, Event, Location, Time.

46. As with interviews, searches were guided by PACE and there were specific forms to use that would ensure compliance with PACE. The rules when I was initially trained required there to be three people (PO Security staff) at a search.

This was later relaxed to two. The search PO Security Rules stated that the subject could have a PO friend present. That person had to be a PO employee, not involved in the inquiry, or a representative from a recognised union. This was later extended to include a friend or neighbour for house searches.

47. Investigators had a duty to investigate a case fully. During an investigation any evidence / information that came to light would be looked and assessed and reported, whether it pointed to or away from the suspect. Also, every line of enquiry that was reasonable would be followed. I would have been aware of this process through the policies that were in place and training that was provided although I can no longer remember the specifics.

48. In regard to obtaining evidence in the course of an investigation usually a branch would have come to the attention of the Branch Analysis Team due to abnormal transactions or cash levels that were increasing and a branch not returning excess cash when requested, excess spoiled labels or other issues. I would check the data requested which usually was the last 3 months of Credence to confirm these potential issues. I would also check for suspicious transactions, which I had seen previously, such as excessive reversals or spoiled postage. In order to have information as evidence a statement would need to be obtained in order for it to be allowed in Court. The Legal Team would advise if there was something specific needed to satisfy the requirements for building a case for prosecution. Fujitsu supplied archive data (ARQ) for data older than three months as that could not be obtained from Credence. With a request for ARQ data there was a provision that Fujitsu would provide a witness statement for the data produced if needed for Court. PO Security had a process

where this could be requested by completing a PO form and submitting it to Fujitsu. I would have been aware of how and where to gather relevant data for an investigation from my initial training and through knowledge shared by my colleagues.

49. As mentioned previously in this statement the investigator disclosure obligation would be by discharged by completing the various PO SEC disclosure forms 006 A, B, C & D. I would have been aware of the disclosure forms from the policies that were in place although I can no longer remember the exact policy in place during my time in the team. I also received training when I joined the team as well as guidance from the Legal Team.

50. In regard to drafting investigation reports the investigator would complete a Suspect Offender Report that was in essence a template which needed various information completed i.e., the first page needed to be completed with the suspect's details and the preamble and then other various points. After the report was complete it would be paginated in the green jacket case file with other items such as the typed interview summary and the appendix folders A, B and C at the rear. This 'green jacket' would have a red label attached that signified it was urgent. It would then be passed to the case file team and on to the Legal Team for their advice. Then at some point it would be returned to the investigator for either further enquiries, closure (NFA) or to obtain a Summons and continue with the prosecution.

51. The Inquiry has asked me whether I was provided with the Casework Management document for either 2000 POL00104747 (Casework

Management Policy (version 1.0, March 2000)) or 2002 POL00104777 (Casework Management Policy (version 4.0, October 2002)). In relation to POL00104747 I do not recall seeing it, but I do recall some of the details. I can see POL00104777 covers the practice of preparing two reports, a Legal report and a Discipline report. I am familiar with this process so I believe I would have seen this document although I cannot recall when.

52. The inquiry has asked me about what I understood to be the instructions/guidance given in the second, third and fourth bullet points on page 2 of the 2000 version (POL00104747) and the first, second and third bullets on page 2 of the 2002 (POL00104777) version and whether I understood this to be relevant to PO's disclosure obligations in relation to information about Horizon bugs, errors and defects. My understanding of these points is that they cover security operational procedures and ensuring weaknesses in transactions and/or procedures were not publicised as this could allow similar offences to be committed before a fix was put in place. For example, if there was a physical security weakness with something like a door then we would not want that to be in the public domain. My understanding is that these points were about the products and ensuring that they were protected. At no time was I aware of any Horizon, bugs, errors or defects so I would not have disclosed anything relating to that. I would assume that disclosure would have been made by someone in the relevant area if they were aware (Legal Team or Fujitsu) of any Horizon, bugs, errors or defects.

53. I cannot recall when compliance checks began for investigations. I seem to remember there was a case file compliance check in the early days when I joined the POL Security team (after 2004) and then on a number of occasions and subsequently the process was reviewed and updated. The purpose, I believe, was to ensure there was a common standard that all case files were presented in the same way across the team. I don't recall having any role in the development, management or amendment of the compliance documents referred to in the email from David Posnett dated 23 May 2011 (POL00118096).

54. The Inquiry have asked me for my understanding of paragraph 2.15 of the document entitled "Guide to the Preparation and Layout of Investigation Red Label Case Files – Offender reports & Discipline reports" (POL00118101). My understanding of paragraph 2.15 relates to products that are transacted on the counter, such as Car Tax, Mail, Banking etc. I do not believe this distracted from POL's obligation of disclosure or the Offender report template as, to me, it related to products/supervision and not the Horizon system. As I mentioned previously, I would expect any Horizon bugs, errors and defects to be disclosed at a more senior level.

55. The Inquiry has asked me about the appropriateness of the identification codes ("IC") described in the Identification Codes document (POL00118104). The document shows IC codes 1 to 7 which as far as I am aware were used by all Law Enforcement. The descriptors contain words that are outdated and offensive. I do not know where this document originated from or the author. The Security Team investigators had to fill in a form NPA01 - NON-POLICE AGENCIES (Notification of Proceedings to Police) that I believed mirrored the

Police's process for when someone is arrested and taken into Custody at a Police Station. The form had a number of other identifiers; height, whether the person was left or right-handed, their build and any scars, marks or tattoos. This form would have been completed with the Antecedents Form following the completion of a tape-recorded interview with the person. In addition, the IC code was always shown on the 1st page of the Suspect Offender Report.

Analysing Horizon data, requesting ARQ data from Fujitsu and relationship with Fujitsu

56. During my time in the Security Team before the GLO, I do not recall a SPM, SPM assistant or Crown Office employee attributing a shortfall to problems with Horizon. Usually, the reason for an audit would have come from another team that had found some anomaly with the branch's transactions, for example, abnormal reversals or unusual Mail transactions, or how the branch was managing their cash, for example, cash in pouches not being despatched, cash not being returned when instructed or cash being requested when a branch was showing as holding sufficient cash.

57. When required, credence data would more than likely be used as that showed exactly the same information as ARQ data. As a rule, I am unsure if Horizon data (ARQ or Credence) was provided to the SPM as a matter of course, notwithstanding the disclosure obligation during a prosecution. As far as I recall my direct contact with Fujitsu was very little. Any request for ARQ data would have been via our Casework team.

58. I have been asked by the Inquiry to what extent I considered Gareth Jenkins to be acting as an expert witness, whether I understood the rules governing independent expert evidence and who advised me in this regard. My understanding of Gareth Jenkins was as someone who would provide a witness statement on behalf of Fujitsu when ARQ data was required for court. He was the 'expert witness' and his statements went into detail of how the Horizon system operated which was far above my knowledge of the Horizon system or computers in general.

59. The Security Team would request the ARQs where necessary for an investigation and if a statement was required one would be provided by Fujitsu. That was as far as my understanding of an 'expert witness' went. I am not aware of any specific guidance given in regard to expert witnesses. The only other term I remember hearing, but in later years, was SME (Subject Matter Expert), which I took to be the same as expert witness as the Security team were told that once one had been located POL would continue with prosecutions. This would have been around 2014 (possibly) but I am unsure due to the passing of time.

60. The Inquiry has asked me about my understanding of the issues in Craigton branch and have referred me to the following documents FUJ00157001 (Email chain dated June 2018), FUJ00170865 (Email chain dated June 2018) and FUJ00170869 (Email chain dated June 2018). I do not believe I had any involvement in this matter other than I was copied into the email from Robert Daily (FUJ00170865). At that time, I was working in the Intel Team and along

with my colleague Andrew Wise would be in essence the admin function for the Security Team. We would have requested ARQ data from Fujitsu when required and therefore would have contacts at Fujitsu to email for any questions or requests like this. My understanding of the Scottish Legal system is that they refer to Witness Statements as Certificates. In this case it appears there was a Certificate that had been laid out in a different format to the usual Witness Statements I have seen supplied by Fujitsu when they produce ARQ data.

61. The Inquiry has provided me with document POL00141218 (Email chain dated July 2010) and asked me to explain my understanding of the issue concerning duplication of transactions in the ARQ data and any involvement I had in addressing this issue. POL00141218 is an email sent from Jane Owen and forwarded on by Andrew Daley, the North Team Leader at that time. I do not recall the email and the branches were not ones I was involved in. From reading the document and the email from Penny Thomas my interpretation would be that the ARQ data could contain duplicate information and not the actual Horizon data.

62. The Inquiry has asked me to describe my responsibilities in respect of data handling processes. I did not have any responsibilities in respect of the data handling processes other than those of everyone who had a responsibility to safeguard the physical ARQ discs.

63. My role in the ARQ Disc handling process was only to explain to Moynd Uddin, Information Security Advisor, who was reviewing the POL Security Team

process for managing the ARQs, what our green jacket process was and the way ARQ discs were handled. It was not to explain the data or what was contained on them (POL00122769 - Email chain dated September 2013). The Inquiry has provided me with the following documents POL00122770 (Process for secure storage and management of exhibits obtained in the course of an investigation conducted by Post Office Limited), POL00122771 (Security Investigations Manager's Data Handling Process – Fujitsu Horizon Data Request), POL00122773 (Email chain dated September 2013), POL00122774 (Security Investigations Manager's Data Handling Process – Fujitsu Horizon Data Request), POL00122928 (Email chain dated October 2013) and POL00105222 (Security Investigations Manager's Data Handling Process – Fujitsu Horizon Data Request dated 20 September 2013) which also appear to relate to this process and the review by Moynd Uddin.

64. The Inquiry has also provided me with four other documents related to ARQ data; POL00123286 (Email chain dated May 2014), FUJ00169529 (Email chain dated July 2016), FUJ00169557 (Email chain dated July 2016) and FUJ00170186 (Email chain dated December 2016). I cannot recall POL00123286, dated 02 May 2014 from Jane Bradbury, or POL00105222 (noted above). I am aware due to my current role in the Intelligence Team of the process for requesting ARQ data and the annual allowance laid down by the contract between POL and Fujitsu. I believe that in 2014 investigations/prosecutions were on the decline if not ceased because the SME had not been found and investigations that were open were being closed as No Further Action (NFA). I recall I had one investigation where I was due to obtain a Summons but was instructed not to continue. I cannot recall which case this

was. From speaking to other investigators at the time they were experiencing this also. FUJ00169529, FUJ00169557 and FUJ00170186 are emails from my current role and relate to my team's responsibility of requesting ARQ data from Fujitsu.

65. The Inquiry has asked me to consider POL00121881 (Email chain dated July 2012) and describe my understanding of Jane Owen's concern that POL was failing in its process for the retention and destruction of ARQ requests. My understanding is that this was about the physical discs and not the data they contained.

Relationship with others

66. I cannot recall exactly when but around 2014 POL outsourced their Criminal Law team to Cartwright King. Previously Mr Jarnail Singh was the last remaining POL Lawyer. Therefore, any advice on criminal cases that would have gone to Mr Singh now went to Cartwright King. I dealt with Mr Martin Smith mainly. This was usually if I needed advice on a case or if he needed clarification on a statement or some additional information.

67. Over the next few years Cartwright King supplied training at their Birmingham offices for the Security Team. I believe some of the training was Interviewing, dealing with Solicitors at interview and notebooks. There were probably other training topics, but I can no longer remember them. Cartwright King would also provide barristers for cases when needed.

68. The Inquiry has provided me with document POL00129192 (Email from Allison Drake, dated 14 January 2012) in which Alison Drake notes that I will act as a stand in to support with training by Cartwright King. I can no longer recall this email or the specific training but as I worked in Future Walk, a POL HQ building, where there is a counter training classroom, I would have possibly arranged training for Cartwright King with a trainer and/or I would have greeted them at reception and taken the classroom. I would not have delivered any training.

Involvement in Criminal Case Studies

Prosecution of Peter Holmes

69. My involvement in this case was as 2nd Officer. This role was one of support to the lead officer (1st Officer). Depending on the 1st Officer the 2nd Officer may manage the tape machine and perhaps deal with or check that the relevant paperwork has been completed at each stage of the interview to adhere to the rules of PACE.

70. During the interview the 2nd Officer listens to the questions and replies to ensure both are communicating efficiently. For example, an answer being given by the interviewee may need clarification or lead to another question that the interviewer has not picked up on.

71. I did not normally work with Mr Robert Daily due to him being based in Scotland. I believe this was a rare occasion for me to be assisting him. I would have been made aware of the location, date and time of the interview and would have attended accordingly.

72. As I was only the 2nd Officer, I did not have any dealings with the case prior to interview or subsequently post interview, other than to provide a witness statement (POL00047290) as to my involvement on the day.

73. The Inquiry has asked me for my reflections on the way the investigation and prosecution of Mr Holmes was conducted by Post Office with regard to the Court of Appeal Judgment in *Josephine Hamilton & Others v Post Office Limited*. From what I can recall I did not have any concerns with the way the investigation was run at the time and as 2nd Officer I would have had limited involvement in the investigation.

Prosecution of Allison Henderson

74. I do not recall how I first became involved in the case. The usual procedure was for a case to be given to an Investigator by the Security Team Leader. Following an audit shortage, the decision to conduct a criminal investigation into the loss would be taken by the Security Team leader and the Contracts Team. It would then be allocated to an Investigator.

75. In this case I was what was known as the 1st Officer or Lead Investigator. Various data would have been obtained from Credence, which gives the same data as ARQ but is immediately accessible to download rather than having to request from Fujitsu. Credence data covers the 3-month period prior to the current date. It's also easier to read than the ARQ data as the 'Item Long name' is shown rather than just an item ID. From Credence you can obtain transactional data and event data (back-office items).

76. The Investigation Report (Legal) (POL00047152) would have been written after the interview, from which a typed summary was produced (POL00129785). An investigation report (Discipline) would also have been produced. The typed summary and discipline report were passed to the PM by the Contract Team.
77. With any investigation there would be a number of things that had to be completed one being the 'person not to be employed' form. This would have been emailed to Royal Mail for them to record on their system. This list would have been checked by HR for future applicants. I am unsure of the process other than completing the form.
78. I do not recall the call but from the Investigation Report (POL00047152) it makes reference to me having a telephone call with Ms Henderson inviting her to a tape-recorded interview and explaining what that meant, including her right to have a Solicitor present. I suggested she speaks with her NFSP representative, this was their union as she could have a representative present at the interview. After the call I posted a letter to her detailing what I had explained on the telephone. This would have been standard practice.
79. In order to progress the investigation, the next step was to interview Ms Henderson. The timing of the interview is down to the Lead Investigator. It was standard procedure to have a 2nd Officer at all interviews. In this case it was my colleague Mr Paul Whittaker. I can see that in Ms Henderson's witness statement (WITN01460100) she states, '*I was allowed to bring my Federation*

rep, but he was not allowed to speak during the interview.' As part of PO rules, a person being interviewed can have someone from the union present, this is only to act as an observer. They are told at the start of the interview of their role. They may be permitted to speak if it helps facilitate the interview.

80. Disclosure would only be made to a solicitor not the suspect so that the solicitor could advise their client.

81. The Inquiry has asked me to consider POL00047155 (Memo from Rob G Wilson to Maureen Moors dated 25 March 2010) and POL00044501 (Memo from Chris Knight dated 20 April 2010 (Ms Allison Henderson)) and explain why I considered Ms Henderson would have been aware of the loss when completing her branch trading statement on 6 January 2010. I considered Ms Henderson would have been aware because previous cash declarations had shown an initial loss which was similar to the final loss at audit, but no difference was shown.

82. The Inquiry has asked me to provide details of any legal advice I obtained during the course of the investigation. Legal advice was sort as part of the investigation case file submission to progress the case to prosecution. It may also be requested if other enquiries were required. This file would have been submitted to the Legal Team so they could advise if further actions were required or if not then, to see if there was sufficient evidence to charge. On some occasions, although I do not believe in this case, legal advice would be sort if a situation arose whereby the investigator needed legal advice on a specific problem. For example, this could be advice on getting a person arrested, or what to do if a person refused to sign an investigation form.

83. The charges in this case were provided by the Legal Team, as was the charging decision in any investigation case. If the advice from the Legal Team was to continue to prosecution, then the DAM decision would be sort and if that was given then the investigator would obtain the Summons.
84. In order to obtain a Summons, I would contact the nearest Magistrates Listing Office and explained I was looking to book a Court date for a private prosecution. I would be given a date approximately six weeks ahead. Once a date was booked, I would post the Summons (3 copies; Defendant copy, File copy and a Court copy), an Information Sheet and a covering letter. All of these documents were from templates created locally, not Court produced templates.
85. As noted above, from memory I considered Ms Henderson would have been aware of the loss before the audit as there had been cash declarations for the previous month which showed a similar loss figure to that found in the subsequent audit. In response to Rob Wilson's memo POL00047155 (Memo from Rob G Wilson to Maureen Moors dated 25 March 2010) I replied to him on 20 April 2010 (POL00044501- Memo from Chris Knight dated 20 April 2010 (Ms Allison Henderson). In my report I refer to the fact that the branch is only open 3 days a week and that the transactions are small with the largest being £400. From the previous Branch Trading (BT) on 6th January 2010 to the audit on 10th February 2010 the loss of £12k had occurred if Ms Henderson was to be believed that the BT was correct on 6th January and not falsified.
86. I considered Ms Henderson had adjusted balancing figures hiding a loss and was there by false accounting. From the defence statement (POL00047195)

there was an acceptance of false accounting although the revised Defence Statement did not mention this (POL00044503). I cannot recall if I had sight of either one or both of the defence statements.

87. There is mention in Rob Wilson's email date 16 November 2010 (POL00055783) that he had '*taken instruction from Chris who has confirmed that he would be happy to proceed on this basis.*' I cannot recall the conversation or email exchange, but I would have taken this from Rob Wilson as merely a courtesy and not him requesting legal advice, a business decision or similar from me.

88. In most investigation cases unless there was a trial, I would not attend Court hearings or sentencing. I have done on occasions, but this was in the early days of becoming an investigator to gain experience. My role as an investigator was to provide information/evidence that enabled a case to progress to Court. POL Legal would manage the liaison with external Solicitors as seen in this case and decisions on charges or pleas would be down to those parties.

89. Once a case had been finalised at Court, and the appointed Solicitor/Law firm reported the final outcome, POL legal would send the result on the usual template as a memo (POL00047170- Memo, dated 16 December 2010, (Ms Allison Henderson)).

90. The debt (branch shortage) would have been sent to the Agent Debt team from the audit and they would hold the loss against the PM for the branch. In this case the debt was paid. I would not be involved in this process.

91. The Inquiry has asked me for my reflections on the way the investigation and prosecution of Ms Henderson was conducted by post office with regard to the Court of Appeal Judgment in *Josephine Hamilton & Others v Post Office Limited*. From what I can recall I did not have any concerns with the way the investigation was completed at the time.

Prosecution of Alison Hall

92. I do not recall how I first became involved in this case and assume it was through the usual process where a case would be given to an investigator by the Team Leader. This process followed an audit shortage where the decision to conduct a criminal investigation into the loss had been taken by the Security Team leader and the Contracts Team. It would then be allocated to an Investigator.

93. In this case I was what was known as the 1st Officer or Lead Investigator. That means that you lead on the enquiry and build the case up to the point where it is submitted for legal advice. This role includes conducting interviews, gathering intelligence (banking information, credit checks), searches (if required) and taking witness statements.

94. From the audit the loss would be known and any comments of why there was a loss may have been told to the auditors by the PM. As lead investigator it

would be my job to look at those comments and also see if there was an explanation.

95. In this case I can see from the Investigation Report (legal) (POL00091063) that after writing to Miss Hall to arrange a tape-recorded interview and explaining her legal rights she phoned me and said she would like a Solicitor. I advised her to contact a criminal law solicitor. A week later Mr Paul Normandale, Solicitor with Inesons of Cleckheaton, called me and we arranged to conduct the interview at his office.

96. The decision to interview Miss Hall would have been mine and as with all interviews it was standard procedure to have a 2nd Officer. In this case it was my colleague Mr Paul Whittaker.

97. There would have been no pre-interview disclosure to Miss Hall, but her Solicitor would have had the disclosure.

98. Miss Hall comments in her Witness Statement (WITN01450100) "*the Investigators were Christopher Night and Paul Whittaker, they were not interested in my material and refused to look at it?*" From the typed tape summary (POL00090842) just after the time marker 42:27 I refer to some paperwork that Miss Hall had brought but I was not in a position to look at but would take it away. From the email from Neil Throneycroft dated 14 October 2010 (UKGI00001595) he mentions he has "*just finished discussing Hightown with Chris Knight*". I do not recall this conversation but from the date of the

interview with Miss Hall and the date of this document I would assume I asked Mr Thorneycroft about the paperwork Miss Hall supplied at interview.

99. I contacted NBSC to see if Miss Hall had made contact for help with losses or scratchcards because if she was having problems with them, as she had said, I would expect some calls reporting this and/or asking for help. However, there were none.

100. I contacted a member of the Product & Branch Accounting Team's Lottery Team, Neil Thorneycroft, as Mr Thorneycroft dealt with transaction correction and other issues between branches and the Lottery product. He was very knowledgeable about Lottery transactions and so was the best person to liaise with to get information that would assist my understanding of issues that may have caused the shortage in branch as Miss Hall had suggested.

101. I cannot recall if I was aware that the branch had been attended by an Area Intervention Manager but having read the document POL00091122 (Area Intervention Manager Visit (Ms Alison Hall)) if I had I would not have been a concerned as although the branch had an issue, they had received some support and the matter was rectified. The total visit time 35mins. Although the 'details of visit' show 'horizon problem' this appears to be a user issue on the Horizon system.

102. As with all investigation cases the Contract Team Manager dealt with the contract side. In this case it was Mrs Sue Muddeman (POL00091104- Case notes for conduct suspension cases (Ms Alison Hall)). From the date of the

document, 15 October 2010, I would consider that this had no bearing on the investigation case.

103. I cannot recall the details of this investigation but as with all investigation cases this case would be sent to POL's Legal Team at the point when the lead investigator was seeking advice, which was usually advice on charges. The charges would then be decided by the Legal Team.

104. Once the Legal Team had advised that the evidence was sufficient for the charges the case would be referred to the DAM for a decision on whether to proceed with the prosecution. I had no input.

105. If there was advice for prosecution, I would await any questions or tasks (i.e., further statements) from the Legal Team. I would obtain a Summons from the relevant Court and serve this, usually by post.

106. As mentioned previously in this statement the investigator would comply with their disclosure obligation by completing various PO SEC disclosure forms specifically, 006 A, B, C & D.

107. The Inquiry has asked me to explain the circumstances in which a plea was offered and any discussions within the Post Office in respect of whether the plea was acceptable. The Inquiry has also asked me to confirm any involvement I had in this decision and any conditions that were attached. I have reviewed document POL00019111 and can see I was contacted by Adrian Chaplin (by phone). I do not recall this conversation but assume he would have contacted me because he could not get hold of Mr Wilson. It was

unusual for me to speak to a barrister direct and I would not have authority to negotiate or agree any charges, or any conditions related to those charges. I can only presume that I would have been aware of the agreed position that had been taken by POL and would have confirmed that with Mr Chaplin when he contacted me. Document POL00091374, a letter to Mr Wilson from O'Garras (writing on behalf of Adrian Chaplin), appears to be an update following the Court appearance. This again notes the conversation I had with Mr Chaplin. Although it appears in the letter as though I have agreed the plea, I would not have been involved in this decision. I expect I would have been made aware of the decision by Rob Wilson and so when Mr Chaplin telephoned me, I would have reiterated POL's position. I would have had no involvement in making this decision. I have never had any involvement in making a plea deal or applying conditions to such a deal and this would be outside of my remit as an investigator. I note that in the previous case with Ms Henderson, and in document POL00055783 (Email chain, dated November 2010 (Ms Allison Henderson)), Mr Wilson notes "*Clearly if there were to be a plea to false accounting but on the basis that the Horizon system was at fault that would not be an acceptable basis of plea for the prosecution.*" I was copied into this email and expect I would have had a similar knowledge in this case as Mr Wilson is likely to have kept me aware of progress with the prosecution.

108. The Inquiry has asked me to explain my involvement in any enforcement proceedings brought in this case. I can confirm that any enforcement proceedings, be that recovery under the Proceed of Crime Act or by civil

action, would have been dealt with by our Financial Investigator in conjunction with the legal team or the Agent Debt Team respectively. I would have no involvement.

109. Once the verdict of the court case had been communicated to me, I would have closed the investigation file with no further action on my part.

110. The Inquiry has asked me for my reflections on the way the investigation and prosecution of Ms Hall was conducted by post office with regard to the Court of Appeal Judgment in *Josephine Hamilton & Others v Post Office Limited*. From what I can recall I did not have any concerns with the way the investigation was completed at the time

General

111. I have been asked to consider FUJ00190471 (Email chain dated January 2017) and explain my understand of the issue being discussed and any involvement I had in relation to this issue. I can confirm I am not aware of this document, or the subject discussed within it. I would suggest that the email dated 24 January 2017 from David M Jones to a number of people and cc'd to others does not include myself. Due to the layout of the emails, I would suggest that the cc's are 'Jay, Christopher' and then 'Knight, Miriam'. Due to spacing it does look like I am a recipient 'Christopher Knight'. My email address is actually Christopher G Knight.

112. The Inquiry has asked me to explain the purpose of POL00114558 (Memo from Christopher G Knight to training team (undated)) and the reasons why I

wrote it. This document was written when I was working in Cash Handling & Distribution (CH&D). I do not remember writing it due to the passage of time (circa 2000-2004) but the content and focus appears to be to enhance Cash Value in Transit (CViT) crew training as I seem to recall we were always reiterating the need to check the integrity of cash pouches collected from both Post Office branches and (at that time) retail premises. The cash pouches had a tamper proof seal that if there was an attempt to pull it apart it showed the word 'void'. Sometimes when sealing the pouch, the person did not align the seal and would try and lift and reseal, this could make the word 'void' appear. So, the crewman collecting pouches was to check the serial number and also to check the seal and general integrity of the pouch.

113. The checking of the pouch and seal was also taught to the Cash Centre staff who ultimately opened the pouch to process the contents. As part of their compliance, they were supposed to cut open the pouch at the opposite end to the seal. They were also not supposed to just pull (rip) the pouch apart.

114. I have been asked by the Inquiry to consider POL00141237 (Email chain dated September 2010) and explain whether I considered theft and false accounting to be alternative charges and why I considered that it would make things simpler to accept a guilty plea to false accounting and drop the theft charge. In relation to document POL00141237, an email exchange between Juliet McFarland and myself, I can see I am asking if it would be easier to accept a False Accounting charge as the PM admitted this and had repaid the discrepancy. The choice of charges was always made by the Legal Team.

115. I have been asked by the Inquiry to consider POL00145852 (Email from Dave Posnett to Jarnail Singh dated 7 August 2013) and describe the discussions I had with the Barrister in question about 'Horizon issues' and whether I had any discussions with POL about this issue. In relation to the document, I do not recall the conversation(s) with the Barrister. This was a Police investigation and so I am assuming it is a CPS Barrister. In the document I mention advising the Barrister to look at 2nd Sight reporting about Horizon matters. The email goes on to say I was meeting the Barrister. I would have put him in touch with Jarnail Singh, PO Legal Team and / or Martin Smith, Cartwright King, as issues with Horizon / 2nd Sight report were out of my sphere of knowledge.

116. I do not recall being aware of any robust challenges to Horizon (other than the GLO). I dealt with a number of people who admitted their dishonesty and so the integrity of Horizon was not at the forefront of my mind. The business message was consistent that Horizon was robust so there was never any doubt in my mind. I remember that latterly (approx. 2010/2011) that we (the investigators) were advised that if someone we were interviewing said the loss was due to Horizon, we were to ask how this manifested and obtain details from them. We were also asked to cover in the interview what training they had received.

117. There are no other matters I consider to be of relevance to the Inquiry's Terms of Reference.

Statement of Truth

I believe the content of this statement to be true.

Signed.....**GRO**.....

Date.....23/11/2023.....

Index to First Witness Statement of Christopher Granville Knight

No.	URN	Document Description	Control Number
1	POL00129261	CV of Christopher G Knight	POL-0134971
2	POL00127128	One to One Meeting Record 12/09/2013	POL-0133353
3	POL00127129	One to One Meeting Record 30/10/2013	POL-0133354
4	POL00127237	One to One Meeting Record 12/03/2014	POL-0133427
5	POL00104747	Casework Management Policy (version 1.0, March 2000)	POL-0080887
6	POL00104777	Casework Management Policy (version 4.0, October 2002)	POL-0080417
7	POL00104754	Rules and Standards Policy (version 2.0, October 2000)	POL-0080394
8	POL00030687	Investigation Procedures Policy (version 2.0, January 2001)	POL-0027169
9	POL00104762	Disclosure Of Unused Material, Criminal Procedures and Investigations Act 1996 Codes of Practice Policy (version 1.0, May 2001)	POL-0080402
10	POL00030578	Royal Mail Group Ltd Criminal Investigation and Prosecution Policy" (1 December 2007)	POL-0027060
11	POL00104812	Royal Mail Group Ltd Criminal Investigation and Prosecution Policy" (1 December 2007)	POL-0080444
12	POL00104806	Royal Mail Group Security - Procedures & Standards - Standards of Behaviour and Complaints Procedure" (version 2, October 2007)	POL-0080438
13	POL00031003	Royal Mail Group Crime and Investigation Policy" (version 1.1, October 2009)	POL-0027485
14	POL00030580	Post Office Ltd - Security Policy - Fraud Investigation and Prosecution Policy" (version 2, 4 April 2010)	POL-0027062
15	POL00030579	Post Office Ltd Financial Investigation Policy" (4 May 2010)	POL-0027061
16	POL00104848	Royal Mail Group Security – Procedures & Standards: "Appendix 1 to P&S 9.5 Disclosure of Unused Material & The Criminal Procedure & Investigations Act 1996" (Version 1,	POL-0080480

		July 2010)	
17	POL00104837	Royal Mail Group Security – Procedures & Standards: “Committal & Summary Trial Papers & Processes” (Version 1, July 2010)	POL-0080469
18	POL00026573	Royal Mail Group Security - Procedures & Standards - The Proceeds of Crime Act 2002 & Financial Investigations" (version 1, September 2010)	POL-0023214
19	POL00104857	Royal Mail Group Security - Procedures & Standards - Initiating Investigations" (September 2010)	POL-0080489
20	POL00031008	Royal Mail Group Ltd Criminal Investigation and Prosecution Policy" (version 1.1, November 2010)	POL-0027490
21	POL00104853	Post Office Ltd Financial Investigation Policy (version 2, February 2011)	POL-0080485
22	POL00104855	Post Office Ltd Anti-Fraud Policy (February 2011)	POL-0080487
23	POL00030786	Royal Mail Group Policy Crime and Investigation S2" (version 3.0, April 2011)	POL-0027268
24	POL00105229	Post Office Ltd PNC Security Operating Procedures" (August 2012)	POL-0080854
25	POL00104929	Post Office Limited: Internal Protocol for Criminal Investigation and Enforcement (with flowchart)", (October 2012)	POL-0080561
26	POL00105226	Undated Appendix 1 - POL Criminal Investigations and Enforcement Procedure (flowchart)", (October 2012)	POL-0080851
27	POL00104968	The undated document entitled “POL – Enforcement & Prosecution Policy”	POL-0080600
28	POL00030602	"Post Office Limited: Criminal Enforcement and Prosecution Policy" (undated)	POL-0027084
29	POL00122143	“Security Operations” (version 1.0, December 2012)	POL-0128387
30	POL00122142	Email from Andrew Daley to Christopher G Knight 20/02/2013	POL-0128386
31	POL00031005	"Conduct of Criminal Investigations Policy" (version 0.2, 29 August 2013)	POL-0027487
32	POL00027863	"Conduct of Criminal Investigations Policy" (version 3, 10 February 2014)	POL-0024504
33	POL00030902	"Conduct of Criminal Investigations Policy" (September 2018)	POL-0027384
34	POL00104900	Separation Project – Criminal	POL-0080532

		Investigations Policy for Post Office Ltd	
35	POL00123309	Email from Dave Posnett dated 09/07/2014	POL-0129508
36	POL00123310	Royal Mail Group Security Investigation Communication 6-2014 – Joint investigation protocols RMGS and PO Ltd security	POL-0129509
37	POL00123311	RMG 2.2. Joint Investigation Protocols – RMGS and PO Ltd Security July 2014	POL-0129510
38	POL00123312	MOU on joint investigation protocols post independence involving Royal Mail and Post Office Ltd security	POL-0129511
39	POL00126976	Email from Dave Posnett dated 11/09/2013	POL-0134075
40	POL00123743	Email from Elaine Spencer dated 31/07/2015	POL-0129929
41	POL00123840	Email from John M Scott dated 20/01/2016	POL-0130023
42	POL00104821	“Condensed Guide for Audit Attendance” (version 2, October 2008)	POL-0080453
43	POL00129302	“Security Team Training and Development Policy” (draft, undated, version D1.2)	POL-0135198
44	POL00129192	Email from Allison Drake, dated 14 January 2012	POL-0135120
45	POL00129306	Email from Helen Dickinson to you and others, dated 11 March 2013	POL-0135200
46	POL00129310	Email from Dave Posnett to you and others, dated 22 March 2013	POL-0135204
47	POL00129311	Email invite from Dave Posnett for Cartwright King Training Day	POL-0135205
48	POL00122419	Email from Andrew Scott to you and others, dated 19 April 2013	POL-0127444
49	POL00122860	Email from Andrew Wise to you and others, dated 20 September 2013	POL-0129089
50	POL00123042	Email from Andrew Wise to you and others, dated 11 November 2013	POL-0129259
51	POL00127215	Email from Toni Sless to you and others dated 10 March 2014	POL-0133412
52	POL00123282	Email from Andrew Wise to you and others, dated 25 April 2014	POL-0129485
53	POL00122163	The Grapevine Analysis and Support Team slides	POL-0128406
54	POL00118096	Dave Posnett’s email dated 23 May 2011	VIS00012685
55	POL00118108	Security Operations Team – Case	VIS00012697

		Compliance	
56	POL00118109	Guide to the Preparation and Layout of Investigation Red Label Case Files – File construction and Appendices A, B & C.	VIS00012698
57	POL00118101	Guide to the Preparation and Layout of Investigation Red Label Case Files – Offender reports & Discipline reports	VIS00012690
58	POL00118102	Offence Form	VIS00012691
59	POL00118103	Offence Form	VIS00012692
60	POL00118104	Identification Codes	VIS00012693
61	POL00118105	Summarising of Tape Recorded Interviews Guidance	VIS00012694
62	POL00118106	Notebooks Guidance	VIS00012695
63	POL00118107	Electronic Casework document	VIS00012696
64	POL00121881	Email chain dated July 2012	POL-0128140
65	FUJ00169529	Email chain dated July 2016	POINQ0175710F
66	FUJ00169557	Email chain dated July 2016	POINQ0175738F
67	FUJ00170186	Email chain dated December 2016	POINQ0176367F
68	FUJ00187984	Email chain dated December 2016	POINQ0193701F
69	FUJ00206093	Email chain dated April 2019	POINQ0211814F
70	FUJ00154984	Email chain dated December 2010	POINQ0161179F
71	FUJ00224959	Email chain dated January 2010	POINQ0231074F
72	FUJ00226002	Email chain dated June 2012	POINQ0232119F
73	POL00055189	Memo from Rob G Wilson to Christopher G Knight dated 19 August 2010	POL-0051668
74	FUJ00157001	Email chain dated June 2018	POINQ0163196F
75	FUJ00170865	Email chain dated June 2018	POINQ0177046F
76	FUJ00170869	Email chain dated June 2018	POINQ0177050F
77	POL00141218	Email chain dated July 2010	POL-0143659
78	POL00122769	Email chain dated September 2013	POL-0128998
79	POL00122770	Process for secure storage and management of exhibits obtained in the course of an investigation conducted by Post Office Limited	POL-0128999
80	POL00122771	Security Investigations Manager's Data Handling Process – Fujitsu Horizon Data Request	POL-0129000
81	POL00122773	Email chain dated September 2013	POL-0129002
82	POL00122774	Security Investigations Manager's Data Handling Process – Fujitsu Horizon Data Request	POL-0129003
83	POL00122928	Email chain dated October 2013	POL-0129156
84	POL00105222	Security Investigations Manager's Data Handling Process – Fujitsu Horizon Data Request dated 20	POL-0080847

		September 2013	
85	POL00123286	Email chain dated May 2014	POL-0123286
86	POL00060805	Audit report of 18 September 2008 (Mr Peter Holmes)	POL-0057284
87	POL00050208	Transcripts of the interviews on 19 September 2008 (from 14:11 to 14:56) (Mr Peter Holmes)	POL-0046687
88	POL00050847	Transcripts of the interviews on 19 September 2008 (from 15:06 to 15:50) (Mr Peter Holmes)	POL-0047326
89	POL00050334	Investigation report (legal), dated 6 October 2008 (Mr Peter Holmes)	POL-0046813
90	POL00128950	Investigation report (legal), dated 30 January 2009 (Mr Peter Holmes)	POL-0134173
91	POL00050255	Suspect offender reporting form (Mr Peter Holmes)	POL-0046734
92	POL00050997	Schedule of Charges (Mr Peter Holmes)	POL-0047476
93	POL00047290	Witness statement of Christopher Knight, dated 19 May 2009 (Mr Peter Holmes)	POL-0043769
94	POL00054727	Financial Investigation Events Log (Mr Peter Holmes)	POL-0051206
95	POL00054790	Case closure reporting (Mr Peter Holmes)	POL-0051269
96	POL00113278	Judgment of the Court of Appeal in Josephine Hamilton & Others v Post Office Limited [2021 EWCA Crim 577	POL-0110657
97	POL00047152	Investigation report (legal) (Ms Allison Henderson)	POL-0043631
98	POL00129785	Interview transcript, dated 11 March 2010 (Ms Allison Henderson)	POL-0123811
99	POL00047227	Final branch trading statement, dated 6 January 2010 (Ms Allison Henderson)	POL-0043706
100	POL00047183	Extract of the transaction report (Ms Allison Henderson)	POL-0043662
101	POL00065009_011	'Person not to be employed' memo (Ms Allison Henderson)	POL-0061488_011
102	POL00044501	Memo from Chris Knight dated 20 April 2010 (Ms Allison Henderson)	POL-0040980
103	POL00047159	Memo from Rob Wilson dated 21 May 2010 (Ms Allison Henderson)	POL-0043638
104	POL00047162	Memo from Rob Wilson dated 26 May 2010 (Ms Allison Henderson)	POL-0043641
105	POL00065009_010	Email from Christopher Knight dated 12 July 2010 (Ms Allison Henderson)	POL-0061488_010
106	POL00047193	Summons, dated 12 August 2010, (Ms Allison Henderson)	POL-0043672

107	POL00125643	Committal bundle, dated 27 September 2010, (Ms Allison Henderson)	POL-0131312
108	UKGI00014627	Memo from Rob Wilson to Chris Knight, dated 29 September 2010, (Ms Allison Henderson)	UKGI025420-001
109	POL00055388	Letter from Hugh A Cauthery solicitors to Rob Wilson, dated 7 October 2010 (Ms Allison Henderson)	POL-0051867
110	POL00055542	Advice on evidence, dated 14 October 2010, (Ms Allison Henderson)	POL-0052021
111	POL00125641	Summary of facts (Ms Allison Henderson)	POL-0131310
112	POL00125644	Bundle of witness statements (Ms Allison Henderson)	POL-0131313
113	POL00125646	List of exhibits (Ms Allison Henderson)	POL-0131315
114	POL00125639	Antecedents form (Ms Allison Henderson)	POL-0131308
115	POL00055495	Schedule of Non-Sensitive Unused Material, dated 24 September 2010 (Ms Allison Henderson)	POL-0051974
116	POL00047195	Defence statement (Ms Allison Henderson)	POL-0043674
117	POL00055787	Letter from Belmores Solicitors, dated 16 November 2010 (Ms Allison Henderson)	POL-0052266
118	POL00044503	Amended defence statement (Ms Allison Henderson)	POL-0040982
119	POL00055783	Email chain, dated November 2010 (Ms Allison Henderson)	POL-0052262
120	POL00047169	Memo from Rob Wilson, dated 18 November 2010 (Ms Allison Henderson)	POL-0043648
121	POL00055837	Letter from Miss Andrews to Hugh A Cauthery Solicitors, dated 25 November 2010, (Ms Allison Henderson)	POL-0052316
122	POL00046148	Factual basis/application for a Goodyear indication (Ms Allison Henderson)	POL-0042627
123	POL00055853	Attendance note, dated 1 December 2010, (Ms Allison Henderson)	POL-0052332
124	POL00055890	Letter from Hugh A Cauthery Solicitors to Rob Wilson, dated 15 December 2010 (Ms Allison Henderson)	POL-0052369
125	POL00047170	Memo, dated 16 December 2010, (Ms	POL-0043649

		Allison Henderson)	
126	POL00047155	Memo from Rob G Wilson to Maureen Moors dated 25 March 2010	POL-0043634
127	WITN01460100	Allison Henderson's witness statement to the Inquiry	WITN01460100
128	POL00127621	Case closure report (Ms Alison Hall)	POL-0134386
129	POL00019111	Case file event log (Ms Alison Hall)	POL-0012303
130	POL00091063	Investigation report (legal) and audit report (Ms Alison Hall)	POL-0090707
131	POL00016001	Legal rights form (Ms Alison Hall)	POL-0009193
132	POL00090842	Transcript of Ms Hall's interview, dated 28 September 2010, commencing at 11:37 (Ms Alison Hall)	POL-0090486
133	POL00091237	Transcript of Ms Hall's interview, dated 28 September 2010, commencing at 12:25 (Ms Alison Hall)	POL-0090881
134	POL00120439	NBSC call log (Ms Alison Hall)	POL-0120125
135	POL00091307	HSD call logs (16 May 2005 to 31 August 2007) (Ms Alison Hall)	POL-0090951
136	POL00021278	HSD call logs (19 September 2007 to 23 September 2010); (Ms Alison Hall)	POL-0014470
137	POL00091351	HSD summary (Ms Alison Hall)	POL-0090995
138	POL00091104	Case notes for conduct suspension cases (Ms Alison Hall)	POL-0090748
139	POL00091257	Schedule of charges (Ms Alison Hall)	POL-0090901
140	POL00091014	Indictment (Ms Alison Hall)	POL-0090658
141	POL00091065	List of exhibits (Ms Alison Hall)	POL-0090709
142	POL00055290	Schedule of non-sensitive unused material (Ms Alison Hall)	POL-0051769
143	POL00091239	Antecedents form (Ms Alison Hall)	POL-0090883
144	POL00091200	Letter from Sue Muddeman to Alison Hall, dated 24 September 2010 (Ms Alison Hall)	POL-0090844
145	POL00091100	Email from Chris Knight to Sue Muddeman, dated 29 September 2010 (Ms Alison Hall)	POL-0090744
146	POL00091333	Letter from Chris Knight dated 7 October 2010 (Ms Alison Hall)	POL-0090977
147	POL00091106	Interview notes, dated 8 October 2010 (Ms Alison Hall)	POL-0090750
148	POL00128077	Memo from Maureen Moors to the Criminal Law Team, dated 3 November 2010 (Ms Alison Hall)	POL-0134800
149	UKGI00001595	Email from Neil Thorneycroft, dated 14 October 2010 (Ms Alison Hall)	UKGI12409-001
150	POL00091103	Letter from Sue Muddeman to Alison Hall, dated 15 October 2010 (Ms Alison Hall)	POL-0090747
151	POL00090992	Email chain dated 15 October 2010	POL-0090636

		(Ms Alison Hall)	
152	POL00090993	Email from Paul Southin dated 19 October 2010 (Ms Alison Hall)	POL-0090637
153	POL00091313	Letter from Alison Hall to Sue Muddeman, dated 25 October 2010 (Ms Alison Hall)	POL-0090957
154	POL00128079	Memo from Maureen Moors to Chris Knight, dated 24 November 2010 (Ms Alison Hall)	POL-0134802
155	UKGI00001593	Email chain dated 30 November 2010 (Ms Alison Hall)	UKGI012407-001
156	POL00091111	Letter from Andy Bayfield to Alison Hall, dated 22 December 2010 (Ms Alison Hall)	POL-0090755
157	POL00091260	Memo from Juliet McFarlane dated 31 December 2010 (Ms Alison Hall)	POL-0090904
158	POL00128080	Memo from Maureen Moors to Chris Knight, dated 5 January 2011 (Ms Alison Hall)	POL-0134803
159	POL00091000	Email chain dated 5 January 2011 (Ms Alison Hall)	POL-0090644
160	POL00091244	Memo from Chris Knight, dated 25 January 2011 (Ms Alison Hall)	POL-0090888
161	POL00091258	Memo from Juliet McFarlane dated 3 February 2011 (Ms Alison Hall)	POL-0090902
162	POL00091300	Email from Dave Pardoe, dated 9 February 2011 (Ms Alison Hall)	POL-0090944
163	POL00091002	Information document (Ms Alison Hall), dated 2 March 2011	POL-0090646
164	POL00091264	Memo from Debbie Helszajn to Maureen Moors (Ms Alison Hall)	POL-0090908
165	POL00091234	Witness statement of Jess Roper (unsigned) (Ms Alison Hall)	POL-0090878
166	POL00091215	Witness statement of Kimberley Langley (unsigned) dated 20 May 2011 (Ms Alison Hall)	POL-0090859
167	POL00091045	Witness statement of Chris Knight (unsigned) dated 23 May 2011 (Ms Alison Hall)	POL-0090689
168	POL00021311	Memo from Chris Knight to Debbie Helszajn, dated 26 May 2011 (Ms Alison Hall)	POL-0014503
169	POL00091011	Email chain dated 23 June 2011 (Ms Alison Hall)	POL-0090655
170	POL00021333	Email from Adrian Chaplin to Rob Wilson and Marilyn Benjamin, dated 28 June 2011 (Ms Alison Hall)	POL-0014525
171	POL00021329	Email from Adrian Chaplin to Paul Southin and Rob Wilson, dated 30	POL-0014521

		June 2011 (Ms Alison Hall)	
172	POL00091020	Note from Adrian Chaplin (undated) (Ms Alison Hall)	POL-0090664
173	POL00091374	Letter from Tracey Langan to Rob Wilson, dated 30 June 2011 (Ms Alison Hall)	POL-0091018
174	POL00091032	Memo from Phil Taylor to Post Office Security, dated 1 July 2011 (Ms Alison Hall)	POL-0090676
175	POL00091024	Email chain dated 24 February 2012 (Ms Alison Hall)	POL-0090668
176	POL00091077	Emails chain dated September 2012 (Ms Alison Hall)	POL-0090721
177	WITN01450100	First written statement of Alison Hall	WITN01450100
178	POL00091122	Area Intervention Manager Visit (Ms Alison Hall)	POL-0090766
179	FUJ00190471	Email chain dated January 2017	POINQ0196188F
180	POL00114558	Memo from Christopher G Knight to training team (undated)	POL-0113664
181	POL00141237	Email chain dated September 2010	POL-0142623
182	POL00145852	Email from Dave Posnett to Jarnail Singh dated 7 August 2013	POL-BSFF-004979