

Witness Name: Kevin Ryan

Statement No: WITN08950100

Dated: 16 November 2023

POST OFFICE HORIZON IT ENQUIRY

FIRST WITNESS STATEMENT OF KEVIN RYAN

I, Kevin Ryan, will say as follows –

1. I have made this witness statement to assist the Post Office Horizon Inquiry (the “Inquiry”) with the matters set out to me in the Rule 9 Request dated 18 October 2023 (the “Request”). The Request contains 60 questions, which I have considered and addressed within this statement. I would like to make the Inquiry aware that I have received legal assistance to produce this statement from my solicitor, Mr Ian Manners of Ashfords LLP. When seeking to obtain assistance from Ashfords LLP, I was assisted by the Post Office Limited (POL) with the initial stage of confirming the availability of insurance coverage, to cover the associated legal costs.
2. I confirm that everything that I include in this statement is to the best of my recollection of matters. There have been instances where I have not been able to recall something due to the amount of time that has passed and, therefore, I have

had to rely on a document provided to me. Where this is the case, I have ensured to indicate this clearly.

Background

3. I am currently employed by POL as a Security Manager and I have worked within the organisation for almost 40 years in many different roles. I would like to flag to the Inquiry that the Request refers to me joining the POL Security Team in 2011 and being an Investigation Manager from 1998 to 2011, however, this is incorrect.

4. I first joined POL in February 1985 as a Counter Clerk at a branch in Liverpool and I stayed in this role for 5 years until August 1990. From this point until June 1991 I held various acting Branch Manager roles in a number of Post Offices on Merseyside. I was then appointed to the Assistant Branch Manager role at Prescott Post Office until March 1995. I was then a National Training Coordinator for POL between March 1995 and August 1997, which involved the scheduling of relevant classroom and in-branch training for new Subpostmasters (SPMs). This training was delivered to SPMs by POL National Field Trainers and would relate to the role of a SPM. I then became a National Field Trainer myself in August 1997, and I would deliver this necessary training to SPMs in classrooms and at branches all over the UK. I stayed in this position until March 2005, and then went on to become an Area Intervention Manager for the North West Region. This was for a period between April 2005 and August 2006 and it entailed working under a Retail Line Manager and going in to branches to resolve issues such as balancing difficulties and non-compliance to procedures. I cannot recall for certain, but I

think that these issues would have been relayed to me by the Retail Line Manager I was working under, who I believe would have obtained that information from data analysis produced by Chesterfield (the POL central finance department), customer complaints via the helpline, area managers, clerks or SPMs themselves following self-reporting of issues via the POL helpline.

5. In September 2006 I became a Business Development Manager for POL, initially covering branches in the Mansfield and Nottingham areas before moving to the Liverpool and Warrington areas. This role involved assisting SPMs with driving sales of Post Office Products and services. I stayed in this position until March 2010 and then moved on to become a Horizon Migration Manager in April 2010 for a short period until early to mid-August 2010. During this role I worked on a National POL project which involved the roll out of the new generation Horizon software system. I would go out to branches on the day they were due to undergo the relevant update of the Horizon system to ensure that the update ran smoothly. This was an overnight download of software.

6. Later in August 2010 I became a Transitional Manager within POL, when the previous project ended. This was not a specified role as such - it was simply a position whereby I remained employed by POL until a suitable role came up to apply for internally. If a suitable role did not come around I was able to take voluntary redundancy instead. After some time in this position I was initially going to opt for redundancy, but around December 2010 vacancies were advertised on the POL internal systems for Security Managers within the POL Security Team. I recall that the job description set out that the role would entail a combination of

Fraud Investigation and Physical Security. I decided to apply for the job and I was invited to a question and answer style interview. Shortly after the interview I was told I was successful in obtaining the role and I went on to start in late January 2011.

7. I cannot recall if any specific pre-training or expertise was required in order to apply for the role of a Security Manager, but I believe that my wide experience of working in various POL roles by this time most likely went in my favour when applying for the position. At the point I became a Security Manager I had been with POL for 26 years but I had not gained any experience in investigations or physical security.
8. In terms of initial training for my role as a Security Manager, I recall going on a 3 week course at some point in February 2011 which was delivered by Paul Whitaker and Paul Southin (who were Security Managers for Royal Mail). I remember that the course covered numerous topics including interviewing under caution, the Police and Criminal Evidence Act 1984 (PACE), Conducting Searches, taking statements, gathering evidence, writing investigation reports and putting investigation case files together. There were likely more topics covered, but these are the main ones that I can recall. I deal with this in further detail later in this statement.
9. I understood at the time that the investigation side of the Security Manager role involved looking into potential fraud or crimes committed within POL. I knew that this entailed interviewing suspected offenders, conducting searches of premises

(if necessary), gathering evidence and putting together case files for submission to the POL Legal Team. In terms of the Physical Security side of the role, I understood that this involved implementing necessary security measures following robberies and burglaries at branches, as well as general equipment deployment to ensure security in branches and cash in transit centres, such as alarms, CCTV and any other security equipment available. I would like to flag to the Inquiry that during the years that I have been a Security Manager for POL, I have carried out much more physical security work than investigatory work.

10. When I first became a Security Manager, I reported to a Team Leader. The Team Leader that I reported changed many times over the years and I cannot recall every single Team Leader that I have had, nor when they changed. I do remember at some point the following individuals have been my Team Leader – Leslie Frankland, Keith Gilchrist, Simon Hutchinson, Helen Dickinson and Simon Talbot.

11. At some point in July 2013 I temporarily stepped in to a Team Leader role, during which I had to report to a Senior Security Manager, who I think was Andrew Hayward at the time. I was asked to cover the role temporarily when the current Team Leader (Keith Gilchrist) left until a permanent replacement was found. During my short time as a Team Leader I think I had around 3 or 4 Security Managers reporting to me, The ones I can recall are Mike Stanway, Steve Bradshaw and Robert Daily. I do not recall providing any in-depth supervision to those Security Managers, but I do remember doing some of their performance reviews and conducting one-to-one meetings with them. I note that **[POL00129337]** shows a one-to-one meeting I conducted with Robert Daily, and

[POL00136728] shows a one-to-one meeting I conducted with Steve Bradshaw. I stepped back down to the position of Security Manager at my own request after 6 or 7 weeks and I have not had anyone report to me since.

12. In all of my time working within POL's Security Team, I have never had any reason to doubt the competence or professionalism of any Team Leaders, Senior Management or other colleagues. I have always believed that everyone has been highly professional and competent throughout my career within POL.

13. When an investigation was carried out, Security Managers would be required to complete disciplinary reports as part of the case file, which were then passed to the Contract Manager dealing with the branch and SPM involved. It would then be the Contract Manager who would make a decision as to whether the SPM would be suspended or not if this had not already been done. Security Managers, including myself, had no involvement in this disciplinary process other than providing this report.

14. In terms of interviewing suspected offenders, this was part of my Security Manager role, however, it would be the Lead Investigator who would ask the majority of questions when interviewing a suspect. I was only a Lead Investigator on a small number of cases before it was decided that POL would no longer pursue any new prosecutions. I believe this change came in late 2013. I was a 2nd officer more often in cases, meaning that I would attend interviews to assist the Lead Investigator. I would then have either no or minimal further involvement

in that case. I deal with this in further detail when addressing questions on the prosecutions of Mr Khayyam Ishaq, Angela Sefton and Anne Neild below.

15. As far as I can recall, it was Lead Investigators on cases who would have assisted with disclosure in criminal proceedings. In the small number of cases where I was a Lead investigator, I would have been involved in gathering evidence for disclosure and providing it to POL's Legal Team to be reviewed and disclosed to the defence. I do not believe I had involvement in directly providing disclosure the defence – it would be the POL legal team who would do this. In the cases where I was a 2nd Officer, I would not have been involved in the disclosure process at all.

16. I am not aware what litigation strategy is and I do not think it is something I would have been involved in.

17. I do not believe I would have had any liaison with other POL departments when I was a 2nd Officer in respect of progressing cases. However, where I was a Lead Investigator on a matter I would have liaised with the relevant Contract Manager to let them know when it was decided whether a prosecution would be pursued or not and to keep them updated on the progress. I would do this because the Contract Manger would often want to know this information before making a decision to terminate or reinstate a suspect. By this point the Contract Manager would have likely already suspended the particular suspect. Unfortunately, I

cannot remember any specific examples of me doing this but I do recall that it is something I did.

18. I would also have liaised with POL's Legal Team when my casefile had been passed across to them. For example, I would have liaised with the Legal Team when gathering disclosure which was included as part of the casefile or about obtaining further evidence if they requested this. I do also remember occasionally liaising with POL Financial Investigators, to inform them about the background of a case if they were taking it on to progress from a recovery standpoint.

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

19. I confirm that I have reviewed the following documents, but I would like to flag to the Inquiry that the majority of them were produced before I joined the Security Team in January 2011:

- i) Casework Management Policy (version 1.0, March 2000) ([POL00104747]) and (version 4.0, October 2002) ([POL00104777]);
- ii) Rules and Standards Policy (version 2.0, October 2000) ([POL00104754]);
- iii) "Investigation Procedures Policy (version 2.0, January 2001) ([POL00030687]);
- iv) Disclosure Of Unused Material, Criminal Procedures and Investigations Act 1996 Codes of Practice Policy (version 1.0, May 2001) ([POL00104762]);

- v) "Royal Mail Group Ltd Criminal Investigation and Prosecution Policy" (1 December 2007) ([POL00030578], which appears to be substantially the same as the policy of the same date with a variation on the title at [POL00104812]) (see, in particular, section 3);
- vi) Royal Mail Group Security - Procedures & Standards - Standards of Behaviour and Complaints Procedure" (version 2, October 2007) ([POL00104806]);
- vii) "Royal Mail Group Crime and Investigation Policy" (version 1.1, October 2009) ([POL00031003]);
- viii) "Post Office Ltd - Security Policy - Fraud Investigation and Prosecution Policy" (version 2, 4 April 2010) ([POL00030580]);
- ix) "Post Office Ltd Financial Investigation Policy" (4 May 2010) ([POL00030579]);
- x) 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, July 2010) ([POL00104848]);
- xi) Royal Mail Group Security – Procedures & Standards: "Committal & Summary Trial Papers & Processes" (Version 1, July 2010) ([POL00104837]);
- xii) "Royal Mail Group Security - Procedures & Standards - The Proceeds of Crime Act 2002 & Financial Investigations" (version 1, September 2010) ([POL00026573]);
- xiii) "Royal Mail Group Security - Procedures & Standards - Initiating Investigations" (September 2010) ([POL00104857]);
- xiv) "Royal Mail Group Ltd Criminal Investigation and Prosecution Policy"

- (version 1.1, November 2010) ([POL00031008]);
- xv) Post Office Ltd Financial Investigation Policy (version 2, February 2011) ([POL00104853]);
- xvi) Post Office Ltd Anti-Fraud Policy (February 2011) ([POL00104855]);
- xvii) "Royal Mail Group Policy Crime and Investigation S2" (version 3.0, April 2011) ([POL00030786]);
- xviii) "Post Office Ltd PNC Security Operating Procedures" (August 2012) ([POL00105229]);
- xix) "Post Office Limited: Internal Protocol for Criminal Investigation and Enforcement (with flowchart)", (October 2012) ([POL00104929]);
- xx) "Undated Appendix 1 - POL Criminal Investigations and Enforcement Procedure (flowchart)", (October 2012) ([POL00105226]);
- xxi) The undated document entitled "POL – Enforcement & Prosecution Policy" ([POL00104968]);
- xxii) "Post Office Limited: Criminal Enforcement and Prosecution Policy" (undated) ([POL00030602]);
- xxiii) "Conduct of Criminal Investigations Policy" (version 0.2, 29 August 2013) ([POL00031005]);
- xxiv) "Conduct of Criminal Investigations Policy" (version 3, 10 February 2014) ([POL00027863]);
- xxv) "Conduct of Criminal Investigations Policy" (September 2018) ([POL00030902]).

20. I do not recall seeing any of the first 21 documents listed in paragraph 19 above, prior to receiving these from the Inquiry. It may be that some of those 21 documents that were dated later (such as in 2009 and 2010) were provided to me when I joined in 2011, however, due to the passage of time I cannot confirm this for certain.

21. I note that document [**POL00105229**] relates to Police National Computer Access (PNC) access, which I believe allowed a user to see if a suspect had previous convictions or pending prosecutions. PNC access was obtained by the Post Office Security team not long after I joined and I do recall this document being circulated at some point early on in my Security Manager career for reading. However, I had no real use of this document other than as a guide for requesting information because I did not personally have PNC access, as it was strictly limited. Access to this was limited to the Post Office Security admin team based in Chesterfield and if required we would request information from them that had to be authorised. This would be authorised by a Security Operations Team Leader or Senior Security Manager.

22. I do also recall the following documents being circulated, but I cannot remember exactly when, nor who circulated them: [**POL00104929**], [**POL00105226**], [**POL00031005**], [**POL00027863**], [**POL00030902**].

23. What I can confirm is that I had no involvement in the development of any of the documents and polices listed in paragraph 19 above.

24. I have been asked to describe the Organisational Structure of the Security Team.

I am aware that that the Physical Security Team and the Fraud and Crime Investigation Team used to form two separate sections to the Security Team. When I joined the Security Team in 2011 as a Security Manager, these roles merged and became to be known as the Security Operations part of POL's Security Team. At this time Security Operations consisted of three teams which were responsible for geographical areas in the UK (North, Midlands and South). Each of the teams had a Team Leader and approximately 18-20 Security Managers based across the country for each geographical area. This has changed as the years have gone by as the number of Security Managers has gradually reduced to its current level of 8 Security Managers covering the whole of the UK and only 1 Team leader. In terms of other sections to the Security Team, I do recall that there was a Financial Investigation Team, a Commercial Security Team and an Casework Team in the earlier years of my Security Manager career. I cannot recall what any of the other sections of the POL Security Team were, but I believe when I first started there were 4 or 5 different sections.

25. I believe that internal POL Investigation Policies governed the role and conduct of Security Managers that were carrying out investigations. As mentioned above, I believe that I have only seen later polices released around and after 2011. In particular, I remember often referring to the flow charts in **[POL00104929]** and **[POL00105226]** when I was still relatively new to the role, as I found them to be a useful resource. I recall that there were changes over time to internal POL procedures and policies, as the number of investigations carried out were reduced over the years, however, I cannot recall what these changes were. In

terms of legislation the main legal frame work that governed the conduct of investigations was the Police and Criminal Evidence Act 1984 (PACE) and the Regulation of Investigatory Powers Act 2000 (RIPA). There was likely other legislation we were required to be aware of in addition to PACE and RIPA, but I cannot recall what they were.

26. I confirm that I have considered [POL00104900], [POL00105191], [POL00123309] and the attachments at [POL00123310], [POL00123311] and [POL00123312]. I cannot recall seeing these documents before they were provided to me with the Request and I did not have any involvement in the development of investigation policies within POL post-separation. I do not recall separation having much of an impact on the way investigations were conducted, however, I had only just been appointed as a Security Manager as separation took place so I may not have noticed or realised any differences.

27. I do not recall ever having a complaint being raised about the conduct of an investigation by the Security Team so I am not aware of what the process relating to complaints would have been. I expect any complaint would have been raised upwards to the Head of Security via Senior Security Managers.

28. Supervision was regularly provided through Team Leaders to Security Mangers conducting criminal investigations. Team Leaders would check in with the Security Managers and provide support if it was required and chase for updates on matters. They would also double check case files before they were sent over

to POL's Legal Team to make sure they were in order and that all required steps had been followed.

29. I do also recall when I first started to take on my own investigations, I had a mentor who would be my 2nd Officer at the interviews I conducted and provide guidance and support with the next steps to take and with running the casefile in general. I had this mentor until I was experienced enough to independently conduct investigations as a Lead Investigator. My mentor was Steve Bradshaw.

30. I do not recall there ever being a difference to the policy and practice regarding the investigation and prosecution of Crown Office employees in comparison to SPMs, their managers and assistants.

Audit and investigation

31. I have considered the document "Condensed Guide for Audit Attendance" (version 2, October 2008) at [POL00104821]. After joining the Security Team in 2011 I only attended at a small number of POL audits. One reason for attending was due to a significant shortage being reported during a routine audit at a branch. If it was geographically feasible my Team Leader would ask me to attend on the day to begin investigating the issue as an open enquiry. Sometimes the location of the branch would make it impossible to attend at the time of the audit and I would have to arrange attendance on an alternative date (most likely the following day).

32. There were also occasions where I was given pre notice to attend an audit which was going to be raised due to suspicious activity being identified (for example, Chesterfield spotting potential fraudulent activity via their data analysis of transactions at a branch or customers (service users reported suspicions activities in relation to their accounts)).
33. In both of these examples, the role of the Security Manager when attending an audit was to speak to the auditors to find out what had happened and if necessary, request an interview with the SPM, request permission to carry out searches of the SPM's home address, and gather all available documents on the day that may be relevant to the matter. This would include reports produced on Horizon by an auditor as part of all audits. Interviews with a suspected offender would not always be done on the day of the audit as sometimes the SPM would request a Post Office friend or a solicitor to be present as was their right. If this was the case we would arrange with the SPM a date to interview them in the near future.
34. Where a shortfall was identified following an audit of a Post Office branch, a Team Leader would determine whether an investigation into potential criminality was conducted by the Security Team or whether the case should be taken forwards as a debt recovery matter by the Financial Services Centre, the Contract Manager or the relevant legal team. If it was decided that a criminal investigation would be pursued, the Team Leader would then allocate the investigation to a Security Manager to run.

35. I believe that Contract Managers had no involvement in relation to the decision on whether to pursue a criminal investigation or not. They dealt purely with disciplinary and contract matters. They would make a decision on whether the SPM would be suspended or not, and in the long term whether they would be terminated or reinstated depending on the circumstances. This was the case when I joined the Security Team in 2011 and it did not change.

36. I do not know what factors determined a Team Leader's decision to go down the criminal investigation route when an audit shortage or suspected fraud was found at a branch, but I imagine the severity of the loss faced by POL as a result would be one factor. When I first joined the Security Team I recall that almost all significant shortages were raised as a criminal investigation, but I cannot remember if there was a minimum figure to determine this action. I believe the level of loss required to trigger a criminal investigation did change over time but I do not know the precise details of this. As time went on, less and less cases were being taken down the criminal investigation route. I believe from late 2013 only a few new investigations were raised. Any ongoing continued until the cases came to a close.

37. Once a decision had been made to conduct a criminal investigation, the process conducted by Security Managers during the initial investigation is contained in the flow charts at [POL00104929] and [POL00105226]. I do recall that the process differed slightly in some respect depending on the type of case. For example, where there was pre-notice given of a potential shortage (for example, a suspected fraud notified by Chesterfield, POL service users or branch

employees) which resulted in an audit being scheduled, Security Managers would speak to the necessary individuals and POL departments from the outset, such as the relevant Contract Manger, Auditors and Chesterfield to establish as much background information about what had been occurring at the branch. All relevant data would be obtained such as Call Logs, Credence Data, Cash Holdings Data, Transactional Correction data, and if an audit had already taken place, a copy of the audit report and all relevant audit documentation. All of this information would be studied ahead of any interview taking place with the suspected offender and would be referred to during such interview. Any activity undertaken would also be recorded on an event log.

38. Where a shortage was discovered following a routine audit and your Team Leader allocated the case to you to investigate as Lead Investigator, a Security Manager would attend the branch on the day if geographically possible, usually with at least one other Security Manager to assist as 2nd officer. On arrival to the branch Security Managers would speak to the Audit Team to get some background information and would gather all the available information and documentation available on the day such as Horizon reports obtained as part of the audit or any documents that may help explain the shortage. Shortly after arrival Security Managers would also speak to the SPM, assistant or staff member suspected of an offence to inform them why they are there, explain their legal rights, request permission to carry out a search if necessary, and arrange for an interview to take place. Sometimes a suspected offender would request a Post Office Friend or solicitor to be present at an interview, meaning the interview could not be carried out on the same day. As mentioned above, in this scenario an interview would

arranged in the near future. During an interview the Lead Investigator would ask a suspected offender questions to try and establish what had happened to the lost funds.

39. Security Managers who were the Lead Investigator on a case would always write up a report following the initial stages of any investigation being completed and this would go on the casefile with all other evidence obtained. As explained earlier in this statement, the Team Leader would review the case file before it was then passed on to the POL Legal Team for consideration. At the end of the report there was a conclusion section where a summary could be provided in relation to what the facts pointed to (for example, potential theft or false accounting).

40. Once a casefile had been sent across to the POL Legal Team, they would come back on occasion to suggest that further evidence was required. In these circumstances, the Security Manager who was the Lead Investigator responsible for the matter would have to gather this further evidence.

Decisions about prosecution and criminal enforcement proceedings

41. So far as I can recall, the POL Legal Team would make a recommendation as to whether or not a matter should proceed to prosecution after they reviewed the casefile and this would then be passed to Cartwright King and they would put forward the charges they believed to be relevant. I believe that this recommendation would then be passed on to the Senior Security Manager to sign off as the prosecuting officer. When I joined the Security Team in 2011 this was

Dave Pardoe. They would make comment on the case file before it was returned to the Lead Investigator. I believe that as things changed all case files were also being sent to the Head of Security, John Scott.

42. I do not believe that an SPM's local Contract Manager had any input in relation to decision of whether to prosecute or not. As explained above, they dealt purely with disciplinary matters in the case.

43. I do not know what test was applied by those making prosecution and charging decisions – Security Managers had no involvement in this. I also do not know what advice, legal or otherwise, was given to those making decisions around prosecution and charging.

44. The steps taken to restrain a suspect's assets by criminal enforcement methods such as confiscation proceedings was a matter dealt with by the POL Financial Investigators. Security Managers also had no involvement in this other than providing information gained as part of the investigation and interview, so I am not aware what these steps might have been. I know that casefiles would be handed over to the Financial Investigators to pursue in relation to recovery of losses and sometimes we would discuss the background of the case with them, but I do not have any knowledge in relation to the basis upon which they would proceed with enforcement. I also do not know if it was the Financial Investigators who would directly decide whether criminal enforcement proceedings should be pursued or whether they liaised with the POL Legal Team to this regard. During

my time in the POL Security Team, I believe the Financial Investigators were Dave Posnett and Helen Dickinson.

Training, instructions and guidance to investigators within the Security team

45. As mentioned earlier in this statement, when I joined the Security Team in 2011 I went on a 3 week training course. This course is mentioned in the feedback document at [POL00129182]. I cannot recall every topic that was taught during this course but I believe that we covered PACE, interviewing, taking witness statements, conducting searches, obtaining evidence, drafting investigation reports and putting casefiles together. My training continued immediately after this through mentoring received from Steve Bradshaw and shadowing more experienced Investigators on cases. I believe that my knowledge and skills in relation to the abovementioned topics were further developed through receiving mentorship and through shadowing colleagues. I also believe I would have learned when to seek relevant evidence from third parties and what my disclosure obligations were through mentorship and shadowing.

46. I confirm that I have considered the following documents:

- i) The feedback in respect of an investigation workshop, dated 2011 at [POL00129182];
- ii) The email from Tony Newman to me at [POL00126612];
- iii) The email from Dave Posnett to me and others, dated 22 March 2013, at [POL00129310] and invitation at [POL00129311];

- iv) The email from Rob King to me and others, dated 25 June 2013, at **[POL00122529]** and attachment at **[POL00122526]**;
- v) The email from Rob King to me and others, dated 21 July 2013 at **[POL00122557]** and the attachments at **[POL00039970]**, **[POL00122559]** and **[POL00122560]**;
- vi) The email from Rob King to me and others, dated 20 September 2013, at **[POL00122897]**;
- vii) The email chain including me at **[POL00127081]**;
- viii) The email from Andrew Wise to me and others, dated 11 November 2013, at **[POL00123042]**;
- ix) The email from Andrew Wise to me and others, dated 25 April 2014, at **[POL00123282]**

47. As can be seen from **[POL00126612]**, there was a development process in place to provide ongoing refresher training to Security Managers on a range of topics. Unfortunately, I cannot remember any precise details of this training.

48. **[POL00129310]** and **[POL00129311]** above relate to an invitation to a training day run by Cartwright King Solicitors. I can recall that Cartwright King Solicitors started to run and deliver useful training for the Security Managers in around 2013. **[POL00122526]** is a guidance document produced by Cartwright King for Security Managers.

49. I can see that **[POL00122557]** is an email from Rob King with attachments sent to my personal email. The attachments **[POL00122560]** and **[POL00039970]** appear to be case file review policy and guidance documents and

[POL00122559] is a process map which shows the different modes by which cases came into the Security Team. I cannot remember receiving this email, but I do vaguely recall the attachments. At that time I may have forwarded Rob King's email to my personal account to enable me to print and review the documents attached at home when working away from the office. So far as I can recall I attended the meeting mentioned in the email and it was to go through the documents attached to the email that were to be distributed to Security Managers.

50. I can see that the email at [POL00122897] relates to the documents circulated ahead of another training day delivered by Cartwright King Solicitors. I believe that I did attend this training but I cannot recall the precise details of it.

51. The email chain including me at [POL00127081] was an invite to a training workshop relating to Security Skills which I believe all Security Managers, including myself, attended. I don't recall the specific details of the training provided in this workshop.

52. I confirm that I have also considered the following documents:

- i) The Casework Management document at [POL00104747] (version 1.0, March 2000) and [POL00104777] (version 4.0, October 2002);
- ii) Dave Posnett's email dated 23 May 2011 at [POL00118096] and the documents contained within the attached
- iii) compliance zip file at [POL00118108], [POL00118109], [POL00118101], [POL00118102], [POL00118103], [POL00118104], [POL00118105], [POL00118106] and [POL00118107].

53. I do not recall ever being provided with the 2000 or 2002 version of the Casework Management Documents mentioned above. This is probably because I didn't join the Security Team until 2011 and by then the documents were quite old. I have reviewed the guidance given in the second, third and fourth bullet points on page 2 of the 2000 version and the first, second and third bullet points on page 2 of the 2002 version, and my understanding of those points is that if Horizon Bugs or errors were discovered or reported during the course of an investigation, this should be disclosed. This point is also included in a 2013 guide introduced post-separation, which I have seen previously - [POL00031005]. Even though this is what I understood, I do not recall ever having any issues or errors with the Horizon system being reported to me. We were always assured by POL and Fujitsu that the Horizon system was robust.

54. Not long after I joined the Security Team in 2011 Security Managers were advised that case files were going to be subjected to compliance checks to ensure uniformity and that all the necessary steps in matters were being completed correctly. I remember that there was a compliance checklist that was completed by a Team Leader when your case file was passed over for review, Your Team Leader would give you a score following the completion of each section of the investigation/case file.

55. I did not play any role in relation to the development or the management of the documents circulated in the email from David Posnett dated 23 May 2011 at [POL00118096].

56. I have reviewed paragraph 2.15 of the document entitled "Guide to the Preparation and Layout of Investigation Red Label Case Files – Offender reports & Discipline reports" ([POL00118101]. I understood this to be an instruction to record any failings discovered during an investigation (whether this be a security issue such as theft, fraud, incompetence, lack of supervision by a SPM over staff at the branch, or issues with a transactional process). If I had been aware of any failings in relation to Horizon Bugs and Errors during my investigations then I believe I would have reported this too, but I had never come across such failings during an investigation. As well as making a Team Leader aware I would imagine this would be entered into the Offender Report pre-amble that formed part of the case file. If these were known I would understand them to be disclosable.

57. I believe the Offender Report template at [POL00118102] was contained at the front of a casefile, but due to the passage of time I cannot recall completing one of these, but I expect that I would have done so.

58. I have no knowledge of who drafted the "identification codes" document at [POL00118104] and having reviewed it I consider it to be a disgrace. I do not recall ever seeing this document before. Security Managers used identification codes for reporting offences following prosecution and these were recorded using the NPA01 at interview, and NPA02 at conviction. If there was a conviction, I believe this information would be entered on to the Police databases. If no conviction was obtained, the information would remain on the casefile.

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

59. At some point in 2013, I recall that a new set of interview questions were provided to Security Managers to cover in an interview with SPMs, which related to whether the SPM had faced any difficulties with Horizon and the training they had around the system. I cannot remember if I ever worked on a case prior to 2013 where a SPM had attributed a shortfall to issues with Horizon. When the new interview questions were introduced in 2013, if the SPM did raise any issues with Horizon, Investigators would have to report this in the case file and were required to request ARQ data for the relevant period. ARQ data is provided by Fujitsu and it reports every transaction or entry made on Horizon at the branch for the time period requested. I do not recall doing this on many occasions.

60. I do vaguely remember a case I worked on based in Newcastle where a SPM had attributed a shortfall to issues with Horizon and I had to request 2 months' worth of ARQ data. I can remember going through this data to rebuild the balances to see if I could identify any issues and I do not believe I found anything. I cannot remember the precise details of this case, including who the SPM was or when the case was. As far as I recall, Fujitsu would not have gone through this data in this case, but I cannot confirm this for certain. I am also unsure if they did on other cases.

61. In any case, Security Managers would use a variety of data including Credence, HORACE and ARQ data to investigate a shortfall whether an issue with Horizon was raised or not. So far as I am aware, Credence and HORACE data is transactional data pulled from Chesterfield data, reporting transactions and other information entered onto Horizon such as transfers and cash declarations. I was able to view Credence but had to request HORACE data from the PO Security admin team. The type of data that Security Manager's requested was dealt with on a case by case basis.

62. I do not know if ARQ data was requested as a matter of course on all matters where a shortfall was attributed to problems with Horizon. I did not have sight of cases dealt with by other Security Managers and can only comment on my own. I believe that I only had to request ARQ data for this specific reason on one occasion, as detailed in paragraph 60 above.

63. I am not aware if ARQ data was provided to SPMs in cases where they had attributed a shortfall to problems with the Horizon system. I do not recall this ever happening in any of my cases, but it may have occurred on matters dealt with by other Security Managers. I do not know for certain.

64. Whenever I did require ARQ data on a matter, I do not recall ever requesting this data directly from Fujitsu – I believe that I always asked our admin team to request it from Fujitsu for me. I do not think I ever spoke with Penny Thomas or Gareth Jenkins from Fujitsu to this regard.

65. I understood that Gareth Jenkins was a subject matter expert from Fujitsu who would provide evidence on whether the Horizon System was working as it should in cases. I do not recall ever having any advice or assistance in relation to the rules governing independent expert evidence. This is probably because Gareth Jenkins was never required to give evidence in any of the cases I took on as Lead Investigator.

Relationship with others

66. Other than attending a few training session at their offices in Birmingham around 2013, I had very little involvement or interaction with Cartwright King Solicitors. They were the external lawyers that the POL Legal Team would instruct on matters to provide advice and representation. Very few of my cases got to the stage where Cartwright King's involvement was required. Due to the passage of time, I cannot remember which of my cases did get to that stage, nor who the main contacts I would have liaised with. The two main contacts I remember from attending training at Cartwright Kings is Martin Smith and Andrew Bolc.

Prosecution of Mr Khayyam Ishaq

67. I confirm that I have considered the following documents:

- i) The Typed copy of Notebook Entry dated 7 April 2011 at **[POL00046313]**;
- ii) The Record of Taped Interview of interview on 7 April 2011 (11.11 to 11.53) at **[POL00046349]**;
- iii) The Record of Taped Interview of interview on 7 April 2011 (12.11 to 12.55) at **[POL00045133]**

- iv) The Investigation Report dated 13 May 2011 at **[POL00046224]**
- v) The memo to the National Security Team dated 18 May 2011 at **[POL00046228]**;
- vi) The memo to the National Security Team dated 5 July 2011 at **[POL00056596]**;
- vii) The further memo to the National Security Team dated 5 July 2011 at **[POL00056600]**;
- viii) The Typed copy of Notebook Entry dated 27 September 2011 at **[POL00065000]**;
- ix) The Summary Record of Taped Interview of interview on 27 September 2011 at **[POL00057985]**;
- x) The Investigation Report dated 3 October 2011 at **[POL00057078]**;
- xi) The Advice and Draft Charge dated 23 March 2012 at **[POL00057543]**;
- xii) Your unsigned statement dated 4 April 2012 at **[POL00057584]**;
- xiii) The unsigned statement of Stephen Bradshaw dated 4 April 2012 at **[POL00057582]**;
- xiv) The summons dated 13 April 2012 at **[POL00046253]**;
- xv) The email from Martin Smith, dated 31 May 2012, at **[POL00119452]**;
- xvi) The unsigned statement of Stephen Bradshaw dated 18 June 2012 at **[POL00058024]**;
- xvii) The unsigned statement of Stephen Bradshaw dated 19 June 2012 at **[POL00058035]**;
- xviii) The Defence Case Statement dated 29 August 2012 at

[POL00046244];

xix) The email from Martin Smith dated 5 September 2012 at

[POL00046243];

xx) The undated Advice on Evidence at **[POL00045134];**

xxi) The unsigned statement of Stephen Bradshaw dated 27 January 2013

at **[POL00046264];**

xxii) The unsigned statement of Stephen Bradshaw dated 31 January 2013

at **[POL00059592];**

xxiii) The unsigned statement of Stephen Bradshaw dated 11

February 2013 at **[POL00059686];**

xxiv) The signed statement of Stephen Bradshaw dated 20 February

2013 at **[POL00046272];**

xxv) The addendum Defence Statement dated 20 February 2013 at

[POL00046278];

xxvi) The unsigned statement of Stephen Bradshaw dated 25

February 2013 at **[POL00059887];**

xxvii) The report dated 21 April 2013 at **[POL00046249];**

xxviii) The email chain from April 2013 at **[POL00060315];**

xxix) The Case Closure Reporting report emailed on 14 May 2013 at

[POL00046250].

68. I would like to flag to the Inquiry that the request indicates that I am listed as the designated prosecution authority in The Investigation Report dated 13 May 2011

at [POL00046224]. This is incorrect - I was never the designated prosecution authority in any case and the document shows that it was David Pardoe who held this role for this specific case.

69. I do not remember a great deal about the background of this case and I have had to rely on the documents provided to help me recall specific details. In terms of setting out my recollection of the background, I defer entirely to the facts set out in the Investigation report completed by Steve Bradshaw and dated 3 October 2011 [POL00057078]. Other than my statement at [POL00057584] I had not previously seen any of the other documents listed in paragraph 67 above as I was not the Lead Investigator on the case. The Lead Investigator was Steve Bradshaw – Mr Bradshaw would have requested me to make this statement as a matter of standard practice, following me assisting him in a follow up interview held with Mr Ishaq on the 27th September 2011. Such interview is evidenced in [POL00065000] and [POL00057985].

70. My involvement in the prosecution of Khayyam Ishaq was minimal. I was only the 2nd Officer at the follow up interview with Mr Ishaq. The role of the 2nd Officer is simply to set up the room for an interview and complete any administrative tasks required by the Lead Investigator. A 2nd Officer can interject and ask questions if relevant during an interview but on this occasion I asked no questions of Mr Ishaq. I had no further involvement in the initial investigation or casefile preparation after the follow up interview. I did attend court in this matter on one occasion as a development and training opportunity as at the time I was a relatively new to the

Security Manager role and I did not have much experience of hearing attendance. I cannot recall which hearing this was.

71. I believe that the decision to charge and prosecute Mr Ishaq would have been made by the POL Legal Team and signed off by David Pardoe as the designated prosecution authority. I had no involvement in this decision.

72. I have considered the statement in [POL00059686] that the Post Office had “absolute confidence in the robustness and integrity of its Horizon system and its branch accounting processes.” I do believe that at the time I would have considered this statement to be accurate because I recall we were regularly informed the same by POL in our team meetings.

73. Other than attending the follow up interview as 2nd Officer, providing a witness statement and observing a court hearing for experience, I had no other involvement in the case of Mr Ishaq.

74. I have considered the judgment of the Court of Appeal in Josephine Hamilton & Others v Post Office Limited [2021 EWCA Crim 577 at [POL00113278]. Due to my minimal involvement in the case involving Khayyam Ishaq, I do not feel that I am able to provide useful comment or reflection on the way the investigation and prosecution was conducted by the Post Office, nor on the outcome of the case.

Prosecution of Angela Sefton and Anne Neild

75. I confirm that I have considered the following documents provided to me in connection with this prosecution:

- i) The Audit Report dated 5 September 2012 at **[POL00044159]**;
- ii) The notebook entry, dated 6 January 2012 at **[POL00044052]**;
- iii) The Record of Taped Interview Summary re interview of Angela Sefton on 20 January 2012 at **[POL00044010]** and **[POL00057435]**;
- iv) The Record of Taped Interview Summary re interview of Anne Neild on 20 January 2012 at **[POL00057389]**;
- v) The handwritten statement from Anne Neild and Angela Sefton at **[POL00043958]**;
- vi) The Investigation Report for Angela Sefton dated 1 February 2012 at **[POL00044198]**;
- vii) The memo from Maureen Moors dated 2 February 2012 at **[POL00044013]**;
- viii) The letter from Cartwright King to the Security Team dated 1 March 2012 at **[POL00057495]**;
- ix) The call logs at **[POL00118474]**.

76. Prior to receiving the abovementioned documents I only had a vague recollection of this case. I have therefore had to rely heavily on the documents provided to me to remember specific details, and defer to my statement at **[POL00044028]** for specific details of my involvement. I recall that Steve Bradshaw was the Lead Investigator in this matter and I understand that on the evening of 5th January

2012 Anne Neild had called up Steve and asked to speak with him outside of work about a matter. Unbeknown to Ms Neild, there was already an audit arranged to take place at the Fazakerley branch the following day due to suspicious fraudulent activity being raised by a service user. Steve Bradshaw called me ahead of the audit and asked me to go into the Fazakerley branch on the day of the audit to assist him with an investigation. He explained the background of the circumstances to me and I vaguely remember during this conversation he informed me that there had been customer complaints about deposits not being placed into their accounts in a timely manner. When I arrived at the Fazakerley branch the Audit Team were already present and carrying out an audit. As confirmed in my witness statement at [POL00044028], I witnessed Anne Neild hand a letter to Mr Bradshaw which was prepared by both Ms Neild and Ms Sefton. I learned that the letter stated that they had been suppressing Girobank deposits from customers. I was then directed to a number of Girobank Deposit slips and cheque envelopes by one of the staff, which had been placed in a cupboard. I think this was by Ms Sefton but I cannot be certain. There were around 40 deposit slips and cheque envelopes and I passed these on to Steve Bradshaw who was also present at the branch. Following the completion of the audit, a consensual search was carried out at the homes of both Anne Neild and Angela Sefton. I was present on both searches and I do not recall anything being seized. I do not believe that any interviews were undertaken on this day.

77. I was then present as the 2nd Officer on 20th January 2012 when Anne Neild and Angela Sefton voluntarily attended an interview under caution at Bootle Post Office. As explained earlier in this statement, the role of the 2nd Officer is to set

up the interview room and complete any administrative tasks required by the Lead Investigator. A 2nd Officer can interject and ask questions if relevant and during the interview with Angela Sefton I can see that I asked a single question about whether she had reported shortages to anyone at all, to which she confirmed she had not. It appears that I did not ask any questions during the interview with Anne Neild.

78. Following the interviews on 20th January 2012, my only further involvement in this case was to produce my unsigned witness statement at **[POL00044028]**. I cannot recall if I ever produced a signed version of this statement though I would expect I did. Mr Bradshaw would have requested me to make this statement as matter of standard practice, to provide an account of me assisting him on the day of the Audit on 6th January 2012 and with the interviews under caution held with Ms Neild and Ms Sefton on 20th January 2012. I had no involvement after this in relation to the casefile preparation, disclosure or seeing the case through the prosecution.

79. I confirm that I have reviewed the visit reports contained within **[POL00044222]** and **[POL00044223]**. As indicated earlier in this statement, between April 2005 an August 2006 I was an Area Intervention Manager. I worked under a Retail Line Manager (who I believe was Paul Williams at the time of these reports) and the role involved conducting visits to branches to provide support. These visits were based on requests for assistance logged by branches, or any other issues raised from within POL such as mails integrity, Opening Hours and Complaints from customers. As described earlier in this statement, I think that these issues would

have been relayed to me by the Retail Line Manager I was working under, who I believe would have obtained that information from a number of sources including data analysis produced by Chesterfield, area managers, or clerks and SPMs themselves following self-reporting of issues vial the POL helpline.

80. Due to the passage of time I cannot recall these visits I conducted from direct memory – I can only rely in what the visit reports say. The visit report dated 14th September 2005 shows that I conducted a visit following a shortage discovered by SPMs which the branch believed was due to a change to the Horizon system or an error in declaring cash. I note that [POL00118474] shows the call logs where the cash shortage issues were raised, which then led to my visit. It appears that when I visited the shortage had been corrected due to an error in entering the ATM figures. Compensating errors can occur if a mistake is made during one balance period and rectified in the next.

81. The visit report dated 6th February 2006 illustrates that my visit related to a large shortage reported by the branch. My role in visiting was to go through the balance documents to see if I could identify if there were any errors in balancing that could have explained the shortage. I note that there was no mention of Horizon failure in this visit report.

82. I would like to emphasise to the Inquiry that my Area Intervention Manager role was not an investigatory role – I was only there to provide support. I had no access to the systems and data that Investigators had. I would only go through documentation in the branch and available on Horizon and information that was

provided to me in relation to a query raised and I would report back my findings to wherever the initial visit request was generated from.

83. Other than the above mentioned visits I conducted on 14th September 2005 and 6th February 2006 as an Area Intervention Manger, I have not had any other previous involvement with interventions at the Fazakerley branch prior to the audit on 5 September 2012.

84. In terms of the advice received from Cartwright King in relation to this case, I note that various correspondence from the Cartwright King Team has been provided with the Request. I would like to flag to the Inquiry that I had never had sight of any of this correspondence previously and I was unaware of what advice was given.

85. I was also not aware of the actions taken by the Post Office following advice from Cartwright King and what charges appeared on the final indictment in this case, until I reviewed the following documents provided with the Request:

- i) The Summons for Angela Sefton dated 15 March 2012 at **[POL00044030]**;
- ii) The Summons for Anne Nield dated 15 March 2012 at **[POL00044033]**;
- iii) The Liverpool Crown Court list showing a PCMH in the case on 25 July 2012 at **[POL00058146]**.

86. I note that these documents confirm that a charge of false accounting was brought against both Anne Neild and Angela Sefton. I had not seen these official documents before, but I do recall knowing at the time that Ms Neild and Ms Sefton were being prosecuted. I was not aware of what the charges were but I would have likely suspected false accounting because from my previous involvement in the case as a 2nd officer I knew they had delayed deposits.

87. I confirm that I have also considered the following documents provided to me:

- i) The list of witnesses relating to R -v- Angela Mary Sefton at **[POL00059525]**;
- ii) The list of exhibits relating to R -v- Angela Mary Sefton at **[POL00059663]**;
- iii) The list of witnesses relating to R -v- Anne Neild at **[POL00058291]**;
- iv) The list of exhibits relating to R -v- Anne Neild at **[POL00059664]**;
- v) My unsigned witness statement dated 21 March 2012 at **[POL00044028]**;
- vi) The unsigned witness statement of Stephen Bradshaw dated 21 March 2012 at **[POL00044027]**;
- vii) The witness statement of Stephen Bradshaw dated 20 September 2012 at **[POL00058307]**;
- viii) The unsigned witness statement of Ali Askar dated 1 May 2012 at **[POL00057824]**;
- ix) The Notice of Further Evidence dated 14 February 2013 at **[POL00043965]**;

- x) The witness statement of Stephen Bradshaw dated 20 December 2012 at **[POL00044047]** and exhibit SB/52 at **[POL00044160]**;
- xi) The unsigned witness statement of Frances Ann Ellis dated 31 August 2012 at **[POL00044037]**;
- xii) The unsigned witness statement of Christopher Dixon dated 18 September 2012 at **[POL00044038]**;
- xiii) The unsigned witness statement of Tim Gordon-Pounder dated 17 December 2012 at **[POL00059459]**;
- xiv) The unsigned witness statement of Stephen Bradshaw dated 10 April 2013 at **[POL00060275]**.

88. As I had no further involvement in this case beyond the point that I provided my unsigned witness statement dated 21 March 2012, I am unable to provide comment on what witness evidence was obtained and relied upon by the Post Office in these proceedings, nor what it was obtained to address. What I can confirm is that I was never called to give evidence in the case.

89. I have also considered the following documents:

- i) The letter from Hogan Brown Solicitors to Stephen Bradshaw dated 10 April 2012 at **[POL00044206]**;
- ii) The Disclosure Officer's Report for Anne Nield dated 28 May 2012 at **[POL00057809]**;
- iii) The Schedule of Non-Sensitive Unused Material for Anne Nield dated 28 May 2012 at **[POL00057812]**;
- iv) The Schedule of Sensitive Material for Anne Nield dated 28 May 2012

at **[POL00057810]**;

- v) The Schedule of Non-Sensitive Unused Material for Angela Sefton dated 28 May 2012 at **[POL00057876]**;
- vi) The Schedule of Sensitive Material for Angela Sefton dated 28 May 2012 at **[POL00057936]**;
- vii) The Schedule of Non-Sensitive Unused Material for Anne Nield dated 18 June 2012 at **[POL00057350]**;
- viii) The Schedule of Non-Sensitive Unused Material for Angela Sefton dated 18 June 2012 at **[POL00057944]**;
- ix) The Schedule of Non-Sensitive Unused Material for Angela Sefton and Anne Nield 18 June 2012 at **[POL00057949]**;
- x) The Defence Statement on behalf of Angela Sefton dated 18 July 2012 at **[POL00044036]**;
- xi) The unsigned and undated Defence Statement on behalf of Anne Nield at **[POL00044042]**;
- xii) The emails dated July 2012 at **[POL00058155]** and **[POL00058115]**;
- xiii) The Application for Disclosure dated 12 September 2012 and attachments at **[POL00058294]**;
- xiv) The emails dated 14 and 17 September 2012 at **[POL00058303]**;
- xv) The letter from Andrew Bolc to Laurence Lee & Co dated 18 September 2012 at **[POL00058306]**;
- xvi) The emails dated 19 and 20 September 2012 at **[POL00058311]**;
- xvii) The letter from Hogan Brown Solicitors to Cartwright King dated 7 November 2012 at **[POL00059314]**;

- xviii) The letter from Rachael Panter to Jarnail Singh dated 8 November 2012 at **[POL00059313]**;
- xix) The letter from Laurence Lee & Co dated 5 February 2013 at **[POL00044023]**;
- xx) The letter from Andrew Bolc to the representatives of Anne Nield and Angela Sefton dated 15 February 2013 at **[POL00059726]**;
- xxi) The letter from Andrew Bolc to Stephen Bradshaw dated 18 February 2013 at **[POL00044020]**;
- xxii) The Schedule of Non-Sensitive Unused Material for Anne Nield dated 18 February 2013 at **[POL00059750]**;
- xxiii) The Schedule of Non-Sensitive Unused Material for Angela Sefton dated 18 February 2013 at **[POL00059752]**;
- xxiv) The letter from Andrew Bolc to Stephen Bradshaw dated 18 February 2013 at **[POL00044022]**;
- xxv) The letter from Hogan Brown Solicitors dated 25 March 2013 at **[POL00044219]**;
- xxvi) The letter from Laurence Lee & Co dated 2 April 2013 at **[POL00044218]**;
- xxvii) The Direction from His Honour Judge Watson QC dated 4 April 2013 at **[POL00044221]**;
- xxviii) The letter from Andrew Bolc to John Gibson dated 5 April 2013 at **[POL00044217]**;
- xxix) The letter from Andrew Bolc to Hogan Brown Solicitors dated 11 April 2013 at **[POL00060277]**;

xxx) The letter from Andrew Bolc to Laurence Lee & Co dated 11 April 2013 at **[POL00060279]**;

xxxi) The letter from Cartwright King to Hogan Brown Solicitors dated 24 July 2013 at **[POL00066798]**;

xxxii) The letter from Cartwright King to Laurence Lee & Co dated 25 July 2013 at **[POL00066799]**.

90. I believe that the Disclosure Officer in this case would have been Steve Bradshaw, as he was the Lead Investigator. I note that he is named as the disclosure officer on a few of the abovementioned disclosure schedules. I do also note that in the email chain at **[POL00058303]**, Andy Bolc from Cartwright Kings makes reference in a draft email to Helen Rose being appointed by POL as the Disclosure Officer dealing with Horizon challenges in the case. I do not know any details about this because as stated above, I did no further work in this matter after providing a witness statement on 21 March 2012. What I can confirm is that I had no involvement in the disclosure process whatsoever.

91. As I did not play any role in the disclosure process, I do not know what disclosure requests and applications were made by the Defence, how the Post Office responded to any such requests, nor what advice was sought from and provided by Counsel in relation to this. I defer entirely to the documents and correspondence provided to me with the Request that relate to this.

92. I confirm that I have considered the following documents:

- i) The Application for Disclosure dated 12 September 2012 and attachments at [**POL00058294**];
- ii) The emails dated 14 and 17 September 2012 at [**POL00058303**];
- iii) The emails dated 27 and 28 November 2012 at [**POL00059421**];
- iv) The emails dated 30 November 2012, 3 December 2012 and 5 December 2012 at [**POL00089394**];
- v) The Notice of Further Evidence dated 6 December 2012 at [**POL00044019**];
- vi) The witness statement of Gareth Jenkins dated 5 December 2012 at [**POL00059424**];
- vii) Exhibit GIJ/1 to Gareth Jenkins' witness statement at [**POL00044163**];
- viii) Exhibit GIJ/2 to Gareth Jenkins' witness statement at [**POL00044164**].

93. I do not know how Gareth Jenkins came to be involved in this case and I was not aware that he had any input until reading the documents produced to me from the Inquiry. If I had been made aware at the time I believe I would have understood that he was the subject matter expert witness from Fujitsu who would provide evidence in relation to the robustness of the Horizon System.

94. At no point was any information given to me by anyone from Fujitsu (or the Post Office) during the course of the criminal proceedings against Angela Sefton and Anne Nield about known bugs, errors or defects in the Horizon IT system, past or current.

95. I confirm that I have considered the following documents:

- i) The Prosecution Opening dated 21 November 2012 at **[POL00044050]**;
- ii) The Agreed Facts for the cases of Angela Sefton and Anne Neild at **[POL00043964]**;
- iii) The letter from Stephen Bradshaw to the Security Operations Casework Team dated 10 May 2013 at **[POL00044024]**;
- iv) The Judgment of the Court of Appeal in Roger Allen & Others v Post Office Limited [2021] EWCA Crim 1874 at **[POL00113343]**

96. Due to me having minimal involvement in only the initial investigation stages, I do not feel that I am able to provide useful comment or reflection on the way the investigation and prosecution was conducted by the Post Office on the whole, nor on the outcome of the prosecution of Angela Sefton and Anne Neild. What I can say is that where I assisted during the initial investigation, I believe that the correct processes and procedures were followed and from reviewing Mr Bradshaw's investigation report, it seems to be compliant.

General

97. Following the introduction of further questions to be asked to SPM's in an interview relating to the Horizon System, I believe that I would have considered a challenge to the integrity of Horizon in one case to be relevant to others. We had to ask them in all new cases going forwards. I cannot recall if I would have thought the same from when I started in 2011 until the introduction of these further interview questions in 2013. I do not recall ever being involved with a case where a challenge to the integrity of Horizon was made during an investigation during

this earlier period.

98. I am unsure what is meant by the following comment in [POL00124105] - "*the risk of testing a case in the criminal court prior to the civil hearing.*" From reviewing the rest of [POL00124105], it appears that Senior Managers in the Security Team were of the opinion that they were not prepared to risk initiating criminal prosecutions in cases. It may have been the case that following a cease to criminal prosecutions, Security Managers were querying whether they would ever be reintroduced, and [POL00124105] was the response from Senior Management that followed. However, this is just speculation and I cannot confirm this for certain. I do not believe I held any opinion or view on this decision – I think I would have just thought it was a decision for Senior Managers to make and I was happy to just accept it.

99. Other than the matters I have already addressed in this statement, there are no other matters which I consider to be relevant to the Inquiry's Terms of Reference that I would like to bring to the attention of the Chair.

Statement of truth

I believe the content of this statement to be true.

Signed: **GRO**

Dated: 16/4/23

Index to First Witness Statement of Kevin Ryan

No	URN	Document Description	Control Number
1.	POL00126709	CV for Kevin Ryan. Worked as Horizon Migration Manager April-October 2010 and as Transitional manager after Oct 2010	POL-0133173
2.	POL00125273	Kevin James Ryan Profile Form	POL-0131701
3.	POL00127168	One to One Meeting Record for Kevin Ryan with Helen Dickinson. Discusses Post Office branch security incidents. Discusses various case updates in regards to Fraud.	POL-0133387
4.	POL00127137	One to One Meeting Record with Kevin Ryan and Simon Hutchinson - Criminal Investigation Case Closures	POL-0133362
5.	POL00136728	One to One Meeting Record between Steve Bradshaw and Kevin Ryan	POL-0125542
6.	POL00129337	One to One Meeting Record of Robert Daily with Kevin Ryan.	POL-0135222
7.	POL00104747	Investigation Policy: Casework Management (England & Wales) v1.0	POL-0080387
8.	POL00104777	Investigation Policy: Casework Management (England & Wales) v4.0	POL-0080417
9.	POL00104754	Investigation Policy: Rules & Standards v2.0	POL-0080394
10.	POL00030687	Investigation Policy - Investigation Procedures v2 January 2001	POL-0027169
11.	POL00104762	Investigation Policy: Disclosure of Unused Material, Criminal Procedures and Investigations Act 1996 Codes of Practice" v0.1	POL-0080402

12.	POL00030578	S02 Royal Mail Group Criminal Investigation and Prosecution Policy December 2007	POL-0027060
13.	POL00104812	Royal Mail Group Ltd Criminal Investigation and Prosecution Polic	POL-0080444
14.	POL00104806	Royal Mail Group Security – Procedures and Standards: Standards of behaviour and complaints procedure No.10-X v2	POL-0080438
15.	POL00031003	Royal Mail Group Crime and Investigation Policy v1.1 October 2009	POL-0027485
16.	POL00030580	Post Office Ltd - Security Policy: Fraud Investigation and Prosecution Policy v2	POL-0027062
17.	POL00030579	Post Office Ltd Financial Investigation Policy, May 2010	POL-0027061
18.	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
19.	POL00104837	Royal Mail Group Security Procedures & Standards: Committal & Summary Trial Papers & Processes P&S Doc 9.5 v1	POL-0080469
20.	POL00026573	RMG Procedures & Standards - Proceeds of Crime Act 2002 & Financial Investigations doc 9.1 V1	POL-0023214
21.	POL00104857	Royal Mail Group Security Procedures & Standards: Initiating Investigations doc 2.1	POL-0080489
22.	POL00031008	RMG Ltd Criminal Investigation and Prosecution Policy v1.1 November 2010	POL-0027490
23.	POL00104853	Post Office's Financial Investigation Policy	POL-0080485

24.	POL00104855	Post Office Ltd. Anti-Fraud Policy	POL-0080487
25.	POL00030786	Royal Mail Group Policy - Crime and Investigation (S2) v3 effective from April 2011, owner Tony March, Group Security Director	POL-0027268
26.	POL00105229	Post Office Ltd PNC Security Operating Procedures	POL-0080854
27.	POL00104929	Post Office Limited: Internal Protocol for Criminal Investigation and Enforcement (with flowchart)	POL-0080561
28.	POL00105226	Undated Appendix 1 - POL Criminal Investigations and Enforcement Procedure (flowchart)	POL-0080851
29.	POL00104968	POL - Enforcement and Prosecution Policy (with comments)	POL-0080600
30.	POL00030602	POL: Criminal Enforcement and Prosecution Policy	POL-0027084
31.	POL00031005	Conduct of Criminal Investigation Policy for the Post Office. (Version 0.2)	POL-0027487
32.	POL00027863	Conduct of Criminal Investigations Policy v0.3	POL-0024504
33.	POL00030902	Final Draft of the Post Office Conduct of Criminal Investigation Policy	POL-0027384
34.	POL00104900	Undated 'Separation Project - Criminal Investigations Policy for Post Office Ltd'	POL-0080532
35.	POL00105191	Activity Plan for POL separation project - Criminal Investigations Policy	POL-0080816
36.	POL00123309	Email from Dave Posnett to Aftab Ali, Andrew Daley, Andrew S McCabe and others Re: Investigation Communication 6- 2014 Joint Investigation	POL-0129508

		Protocols RMGS and PO Ltd Security	
37.	POL00123310	Royal Mail Group Security Investigation Communication-Joint Investigation Protocols RMGS And PO Ltd Security	POL-0129509
38.	POL00123311	RMG: 2.2 Joint Investigation Protocols - RMGS and PO Ltd Security - Version 1.0 Final	POL-0129510
39.	POL00123312	A Memorandum Of Understanding On Joint Investigation Protocols Post Independence Involving Royal Mail And Post Office Ltd Security	POL-0129511
40.	POL00104821	Condensed Guide for Audit Attendance v2	POL-0080453
41.	POL00129182	Investigations Workshop Feedback for course dates between 21st February to 11th March 2011 - Feedback form for Kevin Ryan	POL-0135110
42.	POL00126612	Email from Tony Newman to Andrew J Scott and Kevin Ryan, re: FW: Skills Matrix	POL-0133146
43.	POL00129310	Emails from Dave Posnett to Helen Dickinson, Andrew Daley, Keith Gilchrist and others. Re: Cartwright King Training Day (proposed topics of training)	POL-0135204
44.	POL00129311	Email from Dave Posnett to Helen Dickinson, Andrew Daley, Keith Gilchrist and others. Re:Cartwright Training Day in Birmingham change of start time	POL-0135205
45.	POL00122529	Email from Rob King To: Andy Hayward CC: Darrell Kennedy, Keith Gilchrist and Others Re: notes following meeting with	POL-0128766

		Martin Smith: Cartwright King	
46.	POL00122526	Meeting Notes with Martin Smith KC - Investigations and Audit Policy	POL-0128764
47.	POL00122557	Email chain from Kevin Ryan to Kev Ryan Re: FW: Draft Case Review policy and key points document	POL-0128787
48.	POL00039970	Draft Case File Review: Policy and Process guidelines to complete a successful investigation (undated)	POL-0036452
49.	POL00122559	Flowchart of Case Source Process	POL-0128789
50.	POL00122560	Security Operations Casework Review	POL-0128790
51.	POL00122897	Email chain from Rob King to Andrew Wise, Andy Hayward, Simon I Hutchinson and others RE: Conduct Of criminal Investigations Meeting - 25/9/13	POL-0129126
52.	POL00127081	Email from Andy Hayward to Toni Sless re: Security Skills Workshop 5 & 6 December 2013 - Agenda and Delegate List	POL-0133340
53.	POL00123042	Email thread from Andrew Wise to Rob King, Andy Hayward, Dave Posnett and others re: Conduct Of Criminal Investigation Workshop	POL-0129259
54.	POL00123282	Email from Andrew Wise to Helen Dickinson, Darnell Kennedy, Dave Posnett and others RE: Criminal Investigation Guidelines	POL-0129485
55.	POL00118096	Email from Andrew Wise to Michael Stanway forwarding an email re Casework Compliance	VIS00012685
56.	POL00118108	Appendix 1 - Case Compliance checklist.	VIS00012697

		Undated (date taken from parent email)	
57.	POL00118109	Appendix 2 - File construction and Appendixes A, B and C: "Compliance Guide: Preparation and Layout of Investigation Red Label Case Files" Undated - date taken from parent email	VIS00012698
58.	POL00118101	Appendix 3 - Offender reports and Discipline reports: "Compliance Guide to the Preparation and Layout of Investigation Red Label Case Files" - undated (date taken from parent email)	VIS00012690
59.	POL00118102	Appendix 4 - Offender reports layout: "POL template Offender Report (Legal Investigation)" - undated (date taken from parent email)	VIS00012691
60.	POL00118103	Appendix 5 - Discipline reports layout: "POL template Offender Report (Personnel Investigation)" - undated (date taken from parent email)	VIS00012692
61.	POL00118104	Appendix 6 - Identification codes (undated - date taken from parent email)	VIS00012693
62.	POL00118105	Appendix 7 - Tape Interviews. "POL Security Operations Team guide: Summarising of Tape Recorded Interviews." Undated - date taken from parent email	VIS00012694
63.	POL00118106	Appendix 8 - Notebooks: Guidance on using notebooks in investigations. Undated (date taken from parent email)	VIS00012695
64.	POL00118107	Appendix 9 - Case Progression Toolkit.	VIS00012696

		Undated (date taken from parent email)	
65.	POL00046313	Khayyam Ishaq Case Study: Stephen Bradshaw - Notebook Entry re Ishaq interview	POL-0042792
66.	POL00046349	Interview of Khayyam Ishaq - conducted by Stephen Bradshaw - Time commenced - 11:11 and Time Completed - 11:53	POL-0042828
67.	POL00045133	Khayyam Ishaq case study: Interview of Khayyau Ishaq - conducted by Stephen Bradshaw	POL-0041612
68.	POL00046224	Investigation (Legal) Offender Report by Stephen Bradshaw – Khayyam Ishaq	POL-0042703
69.	POL00046228	Memo from Rob Wilson re Ishaq case	POL-0042707
70.	POL00056596	Memo from Rob G Wilson to Maureen Moors cc Stephen Bradshaw re: POSTVOFFICE LTD -v- KHAYYAM ISHAQ	POL-0053075
71.	POL00056600	Memo from Rob Wilson to Maureen Moors re Khayyam Ishaq further interview	POL-0053079
72.	POL00065000	Typed copy of Notebook Entry from Post Office Ltd Fraud Strand	POL-0061479
73.	POL00057985	Khayyam Ishaq case study: Summary Record of Taped Interview	POL-0054464
74.	POL00057078	Khayyam Ishaq case study: Investigation (Legal) report by Stephen Bradshaw re Khayyam Ishaq	POL-0053557
75.	POL00057543	Khayyam Ishaq case study: POL v Khayyam Ishaq - Advice from Counsel Martin Smith of Cartwright King	POL-0054022
76.	POL00057584	Khayyam Ishaq Case Study: Witness Statement	POL-0054063

		of Kevin Ryan re Khayyam Ishaq case	
77.	POL00057582	Witness Statement of Stephen Bradshaw dated 2012	POL-0054061
78.	POL00046253	Khayyam Ishaq Summons, 4th April 2012	POL-0042732
79.	POL00119452	Email from Martin Smith to Steve Bradshaw cc'ing Jarnail Singh, Post Office Security and others re: CASE NO 24676 - Prosecution of Ishaq - Judgement	POL-0119371
80.	POL00058024	Witness Statement of Stephen Bradshaw re Khayyam Ishaq case	POL-0054503
81.	POL00058035	Witness Statement of Stephen Bradshaw re Khayyam Ishaq case	POL-0054514
82.	POL00046244	Letter from Musa Patels Solicitors to Cartwright King solicitors regarding Khayyam Ishaq Bradford Crown Court 4th September 2012	POL-0042723
83.	POL00046243	Email from Cartwright King to Stephen Bradshaw re Ishaq case	POL-0042722
84.	POL00045134	Advice on Evidence in R v Khayyam Ishaq	POL-0041613
85.	POL00046264	Witness Statement of Stephen Bradshaw - Khayyam Ishaq case	POL-0042743
86.	POL00059592	Witness Statement Post Office Ltd Stephen Bradshaw POL 011 Version April 2012	POL-0056071
87.	POL00059686	Witness Statement of Stephen Bradshaw re Second Sight appointment	POL-0056165
88.	POL00046272	Witness Statement of Stephen Bradshaw - Khayyam Ishaq case	POL-0042751
89.	POL00046278	R v Khayyam Ishaq - Addendum defence case statement	POL-0042757
90.	POL00059887	Witness Statement of Stephen Bradshaw	POL-0056366

91.	POL00046249	Investigation Report by Stephen Bradshaw re Khayyam Ishaq	POL-0042728
92.	POL00060315	Khayyam Ishaq case study: Email from Martin Smith to Mark Ford re. R v Ishaq	POL-0056794
93.	POL00046250	Email from Stephen Bradshaw to Paul X Williams and John Breeden re Case Closure Reporting - Khayyam Ishaq	POL-0042729
94.	POL00113278	Approved Judgment between Josephine Hamilton & Others and Post Office Limited	POL-0110657
95.	POL00044159	Email from Paul X Williams to Tim Gordon-Pounder re audit of Fazakerley Branch	POL-0040638
96.	POL00044052	Typed copy of Notebook Entry re Anne Nield and Angela Sefton Clerks at Fazakerley branch	POL-0040531
97.	POL00044010	Interview record - Angela Sefton interviewed by Stephen Bradshaw	POL-0040489
98.	POL00057435	Angela Sefton case study: Record of Taped Interview – Angela Sefton	POL-0053914
99.	POL00057389	Royal Mail Group, Record of Taped Interview Anne Nield	POL-0053868
100.	POL00043958	Angela Sefton and Anne Nield case study - statement signed by Angela Sefton and Anne	POL-0040437
101.	POL00044198	Angela Sefton and Anne Nield case study: List of Offences Report by Stephen Bradshaw re: Fazakerley Branch	POL-0040677
102.	POL00044013	Internal Memo from Maureen Moors (POL Fraud Team) to RMG Criminal Law Team re Fazakerley Branch - Prosecution recommended	POL-0040492

103.	POL00057495	Angela Sefton and Ann Nield Case Study: Letter from Andrew Bolc to Post Office Ltd, RE: POL v Angela Marty Sefton and Anne Nield	POL-0053974
104.	POL00118474	Fazakerley Call Logs. Case study of Angela Sefton.	POL-0118427
105.	POL00044222	Area intervention manager visit log report - Fazakerley branch 14/09/2005	POL-0040701
106.	POL00044223	Area intervention manager visit log report - Fazakerley branch	POL-0040702
107.	POL00044030	Magistrates Court Summons for Angela Mary Sefton	POL-0040509
108.	POL00044033	Summons letter (Magistrates Court 2267) addressed to Ms Anne Nield.	POL-0040512
109.	POL00058146	Criminal Form List for week commencing 06/08/2012	POL-0054625
110.	POL00059525	List of Witnesses - Post Office The Queen v Anne Nield	POL-0056004
111.	POL00059663	Post Office, List of Exhibits, The Queen v Angela Mary Sefton	POL-0056142
112.	POL00058291	Post Office Ltd, List of Witnesses CROWN v ANNE NIELD	POL-0054770
113.	POL00059664	CROWN v ANNE NIELD, POL List of Exhibits	POL-0056143
114.	POL00044028	Witness Statement of Kevin Ryan - Fazakerley Branch.	POL-0040507
115.	POL00044027	Witness Statement of Stephen Bradshaw - Fazakerley Branch	POL-0040506
116.	POL00058307	Witness Statement of Stephen Bradshaw (signed) - Ann Nield / Angela Sefton case	POL-0054786

117.	POL00057824	Witness statement of Ali Askar re Angela Sefton and Ann Nield	POL-0054303
118.	POL00043965	Court Order allowing further evidence in case of R v Angela Mary Sefton & Anne Nield	POL-0040444
119.	POL00044047	Unsigned Witness statement of Stephen Bradshaw - Fazakerley Branch.	POL-0040526
120.	POL00044160	Extract of NBSC Call Log from Fazakerley branch	POL-0040639
121.	POL00044037	Witness Statement of Frances Ann Ellis	POL-0040516
122.	POL00044038	Witness Statement of Christopher William Dixon	POL-0040517
123.	POL00059459	Witness Statement of Tim Gordon-Pounder Post Office Ltd re Angela Sefton and Ann Nield case studies	POL-0055938
124.	POL00060275	Witness Statement of Stephen Bradshaw - Fazakerley Post Office – Nield & Sefton	POL-0056754
125.	POL00044206	Letter from Hogan Brown Solicitors to Mr S Bradshaw, Re Post office v Mrs Angela Sefton.	POL-0040685
126.	POL00057809	Anne Nield case study: Disclosure Officer's report	POL-0054288
127.	POL00057812	Investigation Schedule, Schedule of non sensitive Unused material - Anne Nield	POL-0054291
128.	POL00057810	Investigation Schedule, Schedule of non sensitive Unused material - Anne Nield	POL-0054291
129.	POL00057876	Angela Sefton case study: Schedule of non sensitive unused material- investigation commencement date form - R v Angela Mary Sefton	POL-0054355
130.	POL00057936	Schedule of Sensitive Material re: Angela Mary Sefton	POL-0054415

131.	POL00057350	Schedule of Non Sensitive Unused Material, R v Anne Nield	POL-0053829
132.	POL00057944	Schedule of non-sensitive unused material- R v Angela Mary Sefton	POL-0054423
133.	POL00057949	Schedule of non sensitive unused material, R v Angela Mary Sefton	POL-0054428
134.	POL00044036	Defence Statement re Angela Mary Sefton - R v Angela Mary Sefton	POL-0040515
135.	POL00044042	Regina v Anne Nield Defence Statement	POL-0040521
136.	POL00058155	Email from Jarnail A Singh to Hugh Flemington, Susan Crichton and Alwen Lyon re: 2nd Sight Review draft	POL-0054634
137.	POL00058115	Email from Jarnail A Singh to Simon Baker; Hugh Flemington, re: Horizon Challenge.	POL-0054594
138.	POL00058294	Letter from Laurence Lee & Co Solicitors to Miss Waters re: Regina v Anne Neild	POL-0054773
139.	POL00058303	Email chain from Jarnail A Singh to Hugh Flemington re: FW: R v Sefton & Nield Liverpool Crown Court 17th October 2012	POL-0054782
140.	POL00058306	Letter from Andrew Bale to Laurence Lee & Co re: R v Anne Nield & another, Liverpool Grown Court regarding appointment of second sight.	POL-0054785
141.	POL00058311	Letter from Jarnail A Singh to Andrew Bloc re: Angela Sefton and Anne Nield - 24040 - Theft / Fraud	POL-0054790
142.	POL00059314	Letter from Hogan Brown Solicitors to Cartwright King solicitors re: R v Angela Sefton - Disclosure of reports	POL-0055793

143.	POL00059313	Email from Rachael Paner to Jarnail A Singh re: Insight 2	POL-0055792
144.	POL00044023	Letter to Cartwright King Solicitors from Ms Brigitte Waters (Laurence Lee & Co Solicitors) regarding 'R v Anne Nield', and asking for documentation relating to an audit conducted in 2005.	POL-0040502
145.	POL00059726	Angela Sefton and Ann Nield case studies: Letter from Andrew Bolc on behalf of Cartwright King Solicitors to the representatives of Angela Sefton and Anne Nield Re Material to disclose - ongoing disclosure.	POL-0056205
146.	POL00044020	Letter from Mr Andrew Bolc to Mr Steve Bradshaw regarding 'R v Sefton & Nield' and preparation for court documents.	POL-0040499
147.	POL00059750	Schedule of Non-Sensitive Unused Material - Anne Nield	POL-0056229
148.	POL00059752	Schedule of non-sensitive unused material - Angela Sefton investigation	POL-0056231
149.	POL00044022	Cover letter from Mr Andrew Bolc to Mr Stephen Bradshaw in 'R v Sefton & Nield' regarding an audit conducted in 2005.	POL-0040501
150.	POL00044219	Letter from Hogan Brown Solicitors to Cartwright King Solicitors Re Future hearing of Mrs Angela Sefton, request for evidence.	POL-0040698
151.	POL00044218	Letter from Laurence Lee & Co Solicitors to Cartwright King Solicitors Re Regina v Anne Neild	POL-0040697
152.	POL00044221	Prosecution Certificate of readiness from Judge	POL-0040700

		Watson QC for R v Anne Nield & Angela Sefton.	
153.	POL00044217	Letter from Mr Andrew Bolc (Cartwright King Solicitors) to John Gibson regarding 'R v Angela Sefton & Anne Nield', enclosing letters from the defence.	POL-0040696
154.	POL00060277	Letter to Hogan Brown Solicitors from Andrew Bolc re. Letter to Defence where there is material to disclose - ongoing disclosure (defence case statement) R v Angela Sefton & another	POL-0056756
155.	POL00060279	Ann Nield case study: Letter to Laurence Lee & Co to Andrew Bolc re. Letter to defence where there is material to disclose - ongoing disclosure (defence case statement) R v Anne Nield & another Court and Next Hearing Date:	POL-0056758
156.	POL00066798	Angela Sefton Case study. Letter from Simon Clarke to Hogan Brown Solicitors re: Angela Sefton outcome and potential grounds to appeal	POL-0063277
157.	POL00066799	Ann Nield Case Study: Letter from Simon Clarke to Laurence Lee & Co Solicitors Re Anne Nield Liverpool Crown Court	POL-0063278
158.	POL00059421	Email from Andrew Bolc to Jarnail A Singh re: Sefton and Nield	POL-0055900
159.	POL00089394	Email from Gareth Jenkins to Andrew Bolc, re: Sefton & Nield	POL-0086369
160.	POL00044019	Notice of further evidence - R v Anne Nield & Angela Sefton	POL-0040498
161.	POL00059424	Witness Statement of Gareth Idris Jenkins	POL-0055903

162.	POL00044163	Horizon Data Integrity - This document describes the measures that are built into Horizon to ensure data integrity	POL-0040642
163.	POL00044164	Horizon Data Integrity for POL - This document describes the measures that are built into Horizon to ensure data integrity	POL-0040643
164.	POL00044050	Case Report - Opening for Regina v Angela Sefton and Anne Neild - In the Crown Court at Liverpool	POL-0040529
165.	POL00043964	Angela Sefton and Anne Neild case studies: Agreed Facts for R v Angela Sefton and Anne Neild	POL-0040443
166.	POL00044024	Report outlining Anne Neild and Angela Sefton's prosecutions - Fazakerley Branch	POL-0040503
167.	POL00113343	Roger Allen & ors v. Post Office Limited and Crown Prosecution Service [2021] EWCA Crim 1874 - Approved Judgment.	POL-0110721
168.	POL00124105	Email chain from Sharron Logan to Jim Coney, Andrew S McCabe, Matt Mowbrow and others, titled "FW: Prosecution meeting outcome"- discussing the group litigation, CCRC and criminal prosecutions	POL-0130247