

Witness Name: Stephen BRADSHAW

Statement No: WITN04450200

Dated: 16 October 2023

POST OFFICE HORIZON IT INQUIRY

SECOND WITNESS STATEMENT OF STEPHEN BRADSHAW

I, STEPHEN BRADSHAW, will say as follows;

1. This witness statement is made to assist the Post Office Horizon IT Inquiry with the matters set out in the Rule 9 Request dated 26 September 2023.

Please provide a full account of your involvement in and recollection of the criminal prosecution of Grant Allen. To assist you in providing this account, please consider the documents referred to below. Your account should address but is not limited to the questions set out below.

2. This enquiry was assigned to myself and Mr Allen was interviewed in accordance with PACE on 12 April 2012. He declined to have a solicitor or a Post Office friend present during the interview (forms POL001 – Legal rights and POL003 – POL employees' rights to a friend at interview were signed by him).

3. During the interview he stated he was unsure if he needed a solicitor and the interview was suspended. He then changed his mind and wished to continue without a solicitor (Form POL002 – Agreement to continue without Legal Advice was signed by him), before the interview recommenced authority was obtained from David Pardoe Senior Security Manager. At the end of interview Mr Allen was given a form (POL019 – notice to person whose interview has been audio recorded), Forms NPA001 (Notification of Proceedings to Police) and POL033 (Antecedents) were completed.

4. Mr Allen was informed a report would be submitted to the CLT / Cartwright King for advice. The advice was received, and summons obtained and served on Mr Allen.. Mr Allen would appear at the magistrates and further progression of the case would be managed by the CLT/CWK to the conclusion of the prosecution. The relationship of myself to CLT / CWK was similar to the police working with the cps.

5. I have been asked to consider the following documents:
 - a) The Winsford Branch relocation timescale of events [POL00089655];
 - b) The NSBC call logs for Winsford Branch [POL00089666];
 - c) The draft witness statement of Richard Cross [POL00089071];
 - d) The record of conversation with Mr Allen [POL00089080];
 - e) The final branch trading statement [POL00089089];
 - f) The Horizon Non Polling Report [POL00089563];
 - g) The bundle of documents at [POL00089486];
 - h) The letter from Stephen Bradshaw to Grant Allen, dated 8 February 2012 [POL00089238];
 - i) The letter from Stephen Bradshaw to Grant Allen, dated 21 March 2012 [POL00089124];
 - j) The letter from Stephen Bradshaw to Grant Allen, dated 5 April 2012 [POL00089243];
 - k) The record of the taped interview, dated 19 April 2012 [POL00089457];
 - l) The investigation report (legal), authored by Stephen Bradshaw, dated 1 May 2012 [POL00089464];

- m) The letter from Andrew Bolc, dated 4 July 2012 [POL00089454];
- n) The PNC Record for Grant Allen (dated 12 July 2012) [POL00089145];
- o) The letter from Stephen Bradshaw, dated 8 August 2012, enclosing the summons [POL00089332];
- p) The indictment [POL00089369];
- q) The letter from Andrew Bolc to Maidments Solicitors Ltd, dated 22 November 2012 [POL00089376];
- r) The letter from Simon Clarke to Maidments Solicitors Ltd, dated 25 July 2013 [POL00089682];
- s) The emails, dated December 2012 [POL00089380];
- t) The witness statement of Gareth Jenkins [POL00089077] and exhibits GIJ/1 [POL00086089] and exhibit GIJ/2 [POL00089115];
- u) The Notice of Additional Evidence, dated 18 December 2012 [POL00089063];
- v) The brief for prosecution counsel [POL00089367];
- w) The emails dated January 2013 [POL00089416];
- x) The letter from Stephen Bradshaw, dated 30 January 2013 [POL00089065];
- y) The Final Result Sheet [POL00089446].

6. I confirm I have considered these documents in the course of producing my witness statement but have no specific comments about individual documents.

How and when did you first become involved in the Grant Allen case?

7. This enquiry for Winsford Post Office branch was allocated to me on or about the 7 February 2012.

Who authorised the prosecution of Grant Alien?

8. The advice to prosecute would have been given by the CLT / Cartwright King. David Pardoe Senior Security Manager was on behalf of POL, the Designated Prosecution Authority Manager. The Designated Prosecution Authority Manager would have sight of the file and give authority to proceed on the advice given by CLT / Cartwright King.

What evidence was obtained and relied upon by the Post Office in these proceedings and what was it obtained to address?

9. At interview Mr Allen was shown the Record of the Conversation he had with the auditors, the cash declaration, Branch Trading Statements, cash declaration, auditors report. In addition to the above the tape transcripts would have also been provided but the matter did not proceed to trial as Mr Allen entered a plea at the PC&MH.

Was any Horizon data (and in particular ARQ logs) requested from Fujitsu in this case?

10. I do not recall any ARQ data being requested. Horizon data would be Cash declarations – Balance snapshots and Branch Trading Statements. If ARQ data was required the investigating Officer would submit a request to the Casework team who would subsequently request the data from Fujitsu.

Who was the disclosure officer in this case?

11. Any disclosure would be in the first instance by me as the Investigation Officer at interview, in this case no solicitor was present as Mr Allen declined legal representation. If the matter proceeded to court then the following documents would be completed for any committal: Self disclosure of Investigators disciplinary record; Non sensitive unused material; Sensitive unused material; Disclosure officers report (material that may undermine the prosecution case or assist the defence); Witness list including availability and contact details and the Exhibits list. After the matter had been listed for court any further evidence would be sent to the lawyers (CLT / Cartwright Wright King) with a statement who would then serve the evidence to the defence.

Who was the investigation manager in this case?

12. The enquiry was assigned to me and Mr Andrew Wise was the 2nd Officer.

Please explain your role in relation to disclosure in these proceedings.

13. Any material to be disclosed would be exhibited in a statement and passed to the CLT or Cartwright King. They as their continuing duty would disclose the material to the defence.

Who was prosecution counsel in this case? Please provide details of your role in instructing counsel.

14. Prosecution counsel was Mr John Gibson . Mr Gibson would have been instructed by Cartwright King. I did not specifically ask for any particular counsel and I had no input into this.

Please describe any discussions you had with counsel instructed by POL to prosecute this case.

15. If required a case conference would take place at Chambers but I do not recall any conference taking place. Otherwise any instructions would be via the Royal Mail Group Criminal Law Team or Cartwright King.

Please describe any further involvement you had in this case.

16. I do not recall any further involvement with this case after the court case concluded.

What are your reflections now on the way the investigation and prosecution of Grant Allen was conducted by the Post Office and the outcome of the case?

17. The Investigation of Grant Allen was conducted in a professional manner at all times. If any issues regarding bugs were declared by POL during this investigation, then any issues would have been looked at in depth to ascertain if there was any impact on this enquiry.

18. I believe that the facts contained in this witness statement are true.

Signed:

GRO

Dated: 16 October 2023

Index to Second Witness Statement of Stephen Bradshaw

<u>No.</u>	<u>URN</u>	<u>Document Description</u>	<u>Control Number</u>
1.	POL00089655	Winsford Branch relocation timescale of events	POL-0086630
2.	POL00089666	NSBC call logs for Winsford Branch	POL-0086641
3.	POL00089080	Draft witness statement of Richard Cross	POL-0086055
4.	POL00089080	Record of conversation with Mr Allen	POL-0086055
5.	POL00089089	Final branch trading statement	POL-0086064
6.	POL00089563	Horizon Non Polling Report	POL-0086538
7.	POL00089486	bundle of documents	POL-0086461
8.	POL00089238	Letter from Stephen Bradshaw to Grant Allen dated 8 February 2012	POL-0086213
9.	POL00089124	Letter from Stephen Bradshaw to Grant Allen, dated 21 March 2012	POL-0086099
10.	POL00089243	letter from Stephen Bradshaw to Grant Allen, dated 5 April 2012	POL-0086218
11.	POL00089457	Record of the taped interview, dated 19 April 2012	POL-0086432
12.	POL00089464	Investigation report (legal), authored by Stephen Bradshaw dated 1 May 2012	POL-0086439
13.	POL00089454	Letter from Andrew Bolc, dated 4 July 2012	POL-0086429
14.	POL00089145	PNC Record for Grant Allen dated 12 July 2012	POL-0086120
15.	POL00089332	letter from Stephen Bradshaw, dated 8 August 2012, enclosing the summons	POL-0086307
16.	POL00089369	Indictment	POL-0086344
17.	POL00089376	Letter from Andrew Bolc to Maidments Solicitors Ltd, dated 22 November 2012	POL-0086351
18.	POL00089682	The letter from Simon Clarke to Maidments Solicitors Ltd, dated 25 July 2013	POL-0086657
19.	POL00089380	Emails, dated December 2012	POL-0086355
20.	POL00089077	Witness statement of Gareth Jenkins and	POL-0086052
21.	POL00086089	Exhibit GIJ/1	POL-0083147
22.	POL00089115	Exhibit GIJ/2	POL-0086090
23.	POL00089063	Notice of Additional Evidence, dated 18 December 2012	POL-0086038
24.	POL00089367	Brief for prosecution counsel	POL-0086342
25.	POL00089416	Emails dated January 2013	POL-0086391

26.	POL00089065	Letter from Stephen Bradshaw, dated 30 January 2013	POL-0086040
27.	POL00089446	Final Result Sheet	POL-0086421