

Witness Name: John Scott

Statement No. WITN08390200

Dated: 11 October 2023

POST OFFICE HORIZON IT INQUIRY

ADDENDUM TO WITNESS STATEMENT DATED 12 MAY 2023

1. This is an addendum to the witness statement I submitted to the Post Office Horizon IT Inquiry ("Inquiry") on 12 May 2012. In that statement, I addressed 81 questions put to me by the Inquiry in respect of my employment at Royal Mail Group (RMG) and, subsequently, at the Post Office Limited (POL), pursuant to a Rule 9 Request dated 12 April 2023.
2. The Rule 9 Request enclosed 77 supporting documents, which I considered in preparing that statement. Since then I have been provided with a large number of additional documents provided in several batches, details of which I set out in an index to this statement. A number of those documents are relevant to things said by me in my first statement and the purpose of this statement is therefore to capture my additional comments having reviewed that material.
3. I do not comment on every additional document that has been disclosed to me. I have not received any additional questions from the Inquiry and it is not clear to me in respect of every document why it has been provided to me.

Prosecutions and issues with the Horizon system

4. First, I wish to elaborate on my role and responsibility in signing off cases for prosecution. I stated at paragraph 19 of my statement that I began signing off on new

prosecutions at POL between mid to late 2013, after being asked by my line manager (Susan Crichton – POL General Counsel) to do so. I have since noted that some of the documents provided by the Inquiry indicate that I took on this responsibility sooner. For example, POL00104929 - which is not dated, but is thought by the Inquiry to have been produced in October 2012 - contains a flow chart which assigns responsibility for “sign off” to the Head of Security (i.e. me) or Head of Legal. Additionally, POL00066639 appears to be a request for my approval on a prosecution decision in October 2012, while POL00113109_020 appears to include a reference to me authorising a prosecution in November 2012. I do not recall these documents or these cases, but they suggest that I began signing off on prosecutions in 2012 rather than in 2013, as I initially thought. It is therefore possible that the conversation I recall with my manager, Susan Crichton, was in 2012, possibly around the time POL separated from RMG. I would speculate that the separation may even have been the catalyst for the change in process, but I cannot recall.

5. In practice, my role in signing off new cases for prosecution entailed me reviewing files that had already been reviewed by the Legal team, and I am not aware of any occasion on which I did not follow their recommendation. I am also unaware as to whether any of the cases that I approved for prosecution resulted in prosecution; around this time a decision was taken (not by me) to pause all prosecutions. As mentioned in my statement at paragraph 19, I know that prosecutions were not proceeding in 2013 after it became necessary to identify a new subject matter expert. I believe this related to the Second Sight report that I refer to at paragraph 116 of my first statement, and which produced its report in around July 2013. If it is correct that I was authorising prosecutions from 2012 then it may be that some of the prosecutions that I authorised did proceed though whether they were then paused as a result of the Second Sight report I do not know. I had thought that I continued to perform this role until I left POL in 2016, however, a document I have seen (POL00030686 at paragraph 3.3) suggests that possibly this responsibility was reassigned from November 2013.
6. Secondly, I would like to clarify, and add additional context to, my awareness and understanding of issues within the Horizon system. One of the original documents provided with the Rule 9 Request was POL00107129, a memo from Rod Ismay on challenges to the Horizon system dated 2010. As mentioned at paragraph 114 of my statement, I am unable to comment on this report. I do not recall that I contributed to it, and POL00120479 - which I have received as additional disclosure - suggests that

I did not. I also do not recall reading it though I expect I almost certainly would have done.

7. I have now recalled, subsequent to completing my first statement, that around this time I asked Mike Young, the Operations Director responsible for Security, IT and Service Delivery (who managed Fujitsu and Horizon service management), and who was my line manager between 2008 and 2011 – about what was happening with the Horizon system, as I was aware of some concerns around the system by external stakeholders. Although I have no detailed recollection I was left with the impression that the matter was being dealt with to the extent necessary by Senior Executives.
8. Similarly, after the Second Sight report was published, my recollection is that the messaging from the business was that the Horizon system had some bugs but that it was fit for purpose (as explained at paragraph 116 of my first statement).
9. I note that Second Sight's report was provided to me in a batch of documents I received from the Inquiry on 7 July, as POL00002228. I do not recall whether I have seen or read the report before but I may have. However, I was broadly aware of the findings of the report (again, as mentioned at paragraph 116 of my statement), and various work streams were set up as a result of these findings which I was either involved in at some point or aware of. For example, weekly Horizon meetings were set up to consider issues holistically which various stakeholders attended, including POL's external lawyers. I have already mentioned these meetings at paragraph 120 of my statement, and will comment further on them below. Additionally, I was involved in setting up a monthly call on the investigations and prosecutions and Cartwright King attended these. I mentioned these meetings at paragraph 117 of my first statement. Separately, a network support project was set up and led by Gayle Peacock around training for the network and other work streams. I note that the terms of reference for this programme- the Branch Support Programme - were provided as part of the additional disclosure I have received as POL00039158 and POL00004399. I do not recall this paper but I do recall the programme, as I have described. I note that I am listed as a key stakeholder but I do not recall that I was heavily involved in the process in practice.

Disclosure allegations

10. At paragraphs 119 to 121 of my original statement, I laid out my memory of the weekly Horizon meetings. In addition, I laid out what I understand has been alleged in relation

to my behaviour in respect of those meetings since, namely the “shredding” allegation in July 2013.

11. The following documents – which formed part of the additional disclosure I have received - are relevant to this period (please note that where I have listed more than one document it is because the same document has been disclosed more than once with a different URN):

- i. POL00139730
- ii. POL00139731
- iii. POL00139732
- iv. POL00139745
- v. POL00139746
- vi. POL00139747
- vii. POL00006977
- viii. POL00139729
- ix. POL00139725
- x. POL00139690
- xi. POL00139748
- xii. POL00139749
- xiii. POL00139725 and POL00083930
- xiv. POL00139691
- xv. POL0013969
- xvi. POL00139693
- xvii. POL00139726
- xviii. POL00139727
- xix. POL00139728 and POL00083935
- xx. POL00139734
- xxi. POL00139740
- xxii. POL00139741

- xxiii. POL00139742
- xxiv. POL00139743
- xxv. POL00139735
- xxvi. POL00139736
- xxvii. POL00139738
- xxviii. POL00139723
- xxix. POL00139694 and POL00139739
- xxx. POL00139707
- xxxi. POL00139708
- xxxii. POL00139711
- xxxiii. POL00139701
- xxxiv. POL00139703
- xxxv. POL00139702
- xxxvi. POL00139721
- xxxvii. POL00139720
- xxxviii. POL00139712
- xxxix. POL00139719
- xl. POL00139717
- xli. POL00139714
- xlii. POL00139715
- xliii. POL00139695
- xliv. POL00139696

12. As I explained in paragraph 119 of my first statement I became aware of the “shredding” allegation in 2021, following the Court of Appeal hearings in *Hamilton and Others*. In the course of those hearings I was identified as the individual who had allegedly given an instruction to “shred” minutes of a meeting / meetings where Horizon issues escalated from the Network had been discussed.

13. It remains the case that despite being provided with additional documents, my actual recollection is very limited. In fact the documents have demonstrated some areas in which my recollection is clearly unreliable. A good example of this is that I had assumed, partly based on what had been said in the Court of Appeal proceedings about me, and as is reflected at paragraph 120 of my first statement, that I had attended the first meetings convened to discuss the Horizon issues that appear to have taken place on 19, 24, 31 July and 7 August, whereas it now appears most likely that the first meeting I attended was on 14 August.
14. Of all the documents disclosed to me the one that provides the best insight into my state of mind at the time is my email to Susan Crichton on 14 August (POL00139690). I do not recall this exchange and did not know it existed until it was disclosed by the Inquiry. It largely speaks for itself and I am unable to add much in terms of the specific matters referred to. What I can add is my impression as its author that it appears I was frustrated when I wrote it. Susan Crichton's email to me on the evening of 13 August had been critical of the way I was managing the Wednesday meetings (*"It sounds like this is not being chaired, the participants are unclear as to its purpose and no minutes are being kept – or there is confusion. Can we discuss?"*). In writing this email I think I am saying to her that I believed that I was managing the meetings in the way that she had asked me to. I do not recall what if any response I received to my email and no response has been disclosed to me.
15. From my email to Susan Crichton and from the other documents that have been disclosed I believe it may be possible to draw various conclusions about what probably happened.
16. It would appear that I initially delegated the task of chairing the Wednesday meetings to Head of Security Operations, Rob King. According to the minute of the first meeting held on 19 July 2013 (POL00139730) he appears to be in the role of chair.
17. According to those minutes it appears some kind of instruction was given regarding note-taking. The minute reads, "No minutes circulated, but we will be taking notes. In scope were issues and problems the group were made aware of." I note that a number of lawyers were present at that meeting.
18. Attributed to Martin Smith from Cartwright King is the comment, "*Clarification on*

disclosure and email correspondence. Emphasised need to ensure that any document produced would be potentially disclosable."

19. Attributed to Andrew Parsons from Bond Dickinson is the comment, "*Spoke about emails, written comms, etc ... if it's produced it's then available for disclosure, if it's not then technically it isn't.*" This is very close to the wording in an email from Jarnail Singh (POL Criminal Lawyer) to Martin Smith dated 1 August 2013 (POL00139746) in which he says, "*I know Simon [Clarke] is advising on disclosure. As discussed can he look into the common myth that emails, written communications etc. meetings. If its produced its then available for disclosure. If it?s (sic) not then technically it isn?t? (sic) Possible true of civil cases NOT CRIMINAL CASES?*". Similar wording is also referenced in the advice from Simon Clarke at POL00006799 ("*Advice had been given to POL which I report as relayed to me verbatim: ... "If it's produced its available for disclosure – if not minuted then technically its not."*").
20. There are minutes of a further meeting that appears to have taken place on 24 July (POL00139731). Again, I do not appear to have been present and it appears that Rob King chaired. I note identical wording, "No minutes circulated, but we will be taking notes. In scope were issues and problems the group were made aware of." Again, I notice the attendance of internal and external lawyers at this meeting.
21. There are minutes of a further meeting that appears to have taken place on 31 July. (POL00139732). Again, I do not appear to have been present but internal and external lawyers were. I do not see anything in these minutes that appears to be relevant to issue of recording minutes or disclosure.
22. There is a telephone note that appears to be of a call on 31 July between Martin Smith (Cartwright King) and Jarnail Singh (POL Criminal Lawyer) (POL00139745). The note reads, "*Discussing disclosure issues: JScott has instructed that typed minutes be scrapped.*" I do not recall speaking with Jarnail Singh. I do not know what is meant by the word, "scrapped" in this context. It appears from my email to Susan Crichton dated 14 August that the notes of the meetings were still in existence as at the date of that email and that it had never been any intention of mine that they should not be retained.
23. The next morning, 1 August, Jarnail Singh emailed Martin Smith (POL00139746) saying, "*I know Simon [Clarke] is advising on disclosure. As discussed can he look into the common myth that emails, written communications etc.. meetings. If its*

produced its then available for disclosure. If it?s (sic) not then technically it isn?t? (sic) Possible true of civil cases NOT CRIMINAL CASES? ". As I comment at paragraph 19 above, this appears to have been based verbatim on something recorded as being said by Andrew Parsons from Bond Dickinson at the meeting on 19 July.

24. In the Clarke Advice circulated on 2 August, it is said, "*The minutes of a previous conference call had been typed and emailed to a number of persons. An instruction was then given that those emails and minutes should be, and have been, destroyed: the word "shredded" was conveyed to me.*" It is not clear to me from the documents disclosed to me how, why or by whom the word "shredded" was conveyed to Simon Clarke. In any event, as I have already noted, it is clear from my email to Susan Crichton dated 14 August, that the notes of the meetings were still in existence.
25. I do not recall that this advice was shared with me at the time.
26. There are minutes of a further meeting that appears to have taken place on 7 August (POL00139729). Again, I do not appear to have been present but internal and external lawyers were, including Martin Smith, Simon Clarke's colleague from Cartwright King. I see nothing in these minutes suggesting any kind of change of approach, and indeed there is no express reference to the minuting of the meetings.
27. On the 13 and 14 August was the exchange of emails between Susan Crichton and me referred to previously (POL139690).
28. There are two separate and slightly inconsistent references to a suggestion that I sent an email on 13 August "admitting" to some kind of instruction to "shred". These are POL00139749 and UKGI00013223. They are inconsistent in that the first suggests the email was sent to Susan Crichton while the second suggests it was to someone else. No such email has been disclosed to me and I do not remember sending such an email. Nothing in the exchange between Susan Crichton and me on 13 and 14 August (POL139690) is consistent with me making any such admission.
29. There is a further note untimed but dated 14 August between Jarnail Singh and Martin Smith. It says, "John Scott will be in conf call> MJS said not appropriate."
30. There are minutes of a meeting on 14 August (POL139725). Notwithstanding the above I do in fact appear to have been at this meeting, as were both Martin Smith and

Jarnail Singh. I have no recollection of the meeting but I do not see any reference in the minutes to the issue of keeping and retaining minutes. My assumption is that my attendance reflects my email to Susan Crichton of the same date (POL00139690) in which I stated:

“Clearly I will now attend the conference calls as Chair and following on from the previous discussions and the steer below, unless otherwise directed, this will become a formal meeting with terms of reference, electronic notes, actions and appropriate governance within such approach.”

31. In the period following 14 August there were various emails agreeing the appropriate form in which to capture the information regarding Horizon issues (see POL00139691, POL00139692, and POL00139693). I do not recall this but can see that I was in copy at some points of this email discussion.
32. There are minutes of meetings on 21 and 28 August (POL00139725 and POL00139726) from which it appears I was present. I do not recall these meetings.
33. From POL00139695 and POL00139696 it appears that a “Protocol” was developed in October 2013 described as being, “for the conduct of Wednesday morning Telephone Conferences held for the purpose of the Identification, Recording and Retention of Material which may be subject to Duties of Disclosure.” It appears to have been drafted by POL’s external lawyers. I do not recall this protocol or discussions around it.
34. By 25 September 2013, according to the minutes of these meetings that have been disclosed, I was no longer attending these meetings.
35. In summary, while I have very little recollection of this episode, the documents disclosed by the Inquiry suggest that I was tasked by my line manager, POL General Counsel Susan Crichton in respect of meetings to be held to consider Horizon issues, that my understanding of this tasking included a requirement to limit the manner and circulation of notes of these meetings, that this related in some way to disclosure obligations, that there was an understanding by POL’s internal and external lawyers at the time that this was the approach being adopted, and that when it transpired that this was considered not to be the appropriate course, corrections were quickly made.
36. If the Inquiry wishes me to consider other documents relevant to this issue I will be

happy to do so.

Statement of Truth

I believe the content of this statement to be true.

Signed: _____

GRO

Dated: _____

11/10/2023.

Index to Addendum Witness Statement of John Scott (additional materials received)

<u>No.</u>	<u>URN</u>	<u>Document Description</u>	<u>Control Number</u>
1.	FUJ00000071	Post Office Counters LTD and ICL Pathway Limited, Information Technology Services Agreement For Bringing Technology To Post Offices dated 28/07/1999	POINQ0006242F
2.	FUJ00086267	Fujitsu and Post Office report, re End to End Application Support Strategy Version 1.0 dated 28/07/2011	POINQ0092438F
3.	FUJ00088036	Fujitsu Services: Secure Support System Outline Design v1.0 dated 02/08/2002	POINQ0094207F
4.	FUJ00096239	Email from Damian McClintock to Bill Membery re: CGP call dated 18/06/2010	POINQ0102410F
5.	FUJ00098169	Fujitsu Services report providing input to Feasibility Study for End-to-End Re-Architecting of Post Office Systems (with pricing) v1.0 dated 24/03/2003	POINQ0104340F
6.	FUJ00122932	Email from Gareth Jenkins to Penny Thomas, Steve Bradshaw and Jane M Owen re: Report - Rinkfield dated 02/08/2010	POINQ0129146F
7.	POL00000391	Index of documents collated by Peters & Peters dated 20/10/2021	VIS00001404
8.	POL00000747	Subpostmaster Contract dated 01/09/1994	VIS00001761
9.	POL00002078	Driving business benefits through the consolidation of data review - Post Office Fraud Solution dated 18/05/2012	VIS00003092
10.	POL00002228	Interim Report into alleged problems with the Horizon system dated 08/07/2013	VIS00003242
11.	POL00003874	Post Office Limited Community Subpostmasters Contract - Agency Contract Amendments Community Contract dated 04/07/2006	VIS00004888
12.	POL00004408	Fraud and Non-conformance in the Post Office; Challenges and Recommendations G-119 Fraud Analysis dated 01/10/2013	VIS00005476
13.	POL00006357	Advice on the use of expert evidence relating to the integrity of the Fujitsu Services Ltd Horizon System dated 15/07/2013	POL-0017625
14.	POL00006799	Advice on Disclosure and the Duty to Record and Retain Material dated 02/08/2013	POL-0017591

15.	POL00010478	Email from Andy Hayward to Maureen, RE: DAM Authority - Upper Bucklebury dated 05/07/2010	POL-0003670
16.	POL00021419	Risk and Compliance Committee Minutes for 08/11/2005	POL-0018049
17.	POL00021422	Risk and Compliance Committee Minutes of 26/03/2008	POL-0018052
18.	POL00028509	Horizon/Pathway Delivery Meeting: Special Meeting Notes, 14 Jan 2000, sent by Dick Brazear, Head of Programme Office for Post Office Network to POCL and ICL employees	POL-0024991
19.	POL00029224	Fujitsu's PEAK report re: Incident Management System log of postmaster complaints, raising multiple issues of phantom transactions and subsequent actions to resolve this dated 12/11/2001	POL-0025706
20.	POL00029475	Email from Rod Ismay to Dave Smith Re: Horizon - Response to Challenges Regarding System Integrity dated 02/08/2010	POL-0025957
21.	POL00029622	Email from Rod Ismay to Rodric Williams, Andrew Winn, Simon Baker and Lesley Sewell and others, re: Anomaly in 14 Branches - Strictly Private & Confidential - Subject to Privilege - Do Not Forward dated 28/06/2013	POL-0026104
22.	POL00029718	Email chain between Steve Parker, Mark Wright, Andrew Winn, Emma Langfield and Gareth Jenkins Re: ISSUE - Receipts & Payments mismatch dated 24/12/2010	POL-0026200
23.	POL00038878	Branch Trading Reporting, Management and Control and Transaction Management, Conceptual Design (version 1.0) dated 03/03/2004	POL-0035360
24.	POL00039158	Branch Support Programme – TOR v.3 In confidence Gayle Peacock dated 07/08/2013	POL-0035640
25.	POL00039522	Table of Horizon bugs with reference to statements made by Gareth Jenkins and Ann Chambers in Judgment No 6 dated 16/12/2019	POL-0036004
26.	POL00040032	Post Office- Lessons Learned Review of handling of alleged issues/concerns about Horizon: Terms of Reference dated 30/08/2013	POL-0036514
27.	POL00041174	Suspension Case History dated 09/06/2016	POL-0037656
28.	POL00043372	POL Meeting Minutes to discuss Horizon Issues of 23/10/2013	POL-0039854

29.	POL00057602	Financial Investigation Events Log, POLTD/0809/0101 Susan Rudkin dated 10/04/2012	POL-0054081
30.	POL00060505	Susan Rudkin case study: Email chain from John M Scott to Dave Posnett re: Horizon Integrity - Strictly Private and Confidential - Subject to Legal Privilege - Not for Wider Circulation dated 03/06/2013	POL-0056984
31.	POL00062275	POL Financial Investigations guidance dated 01/04/2008	POL-0058754
32.	POL00066639	Memo from Legal Compliance to John Scott, Broughton Avenue PO-Lee Phelps POLTD 12/13/0054 dated 25/10/2012	POL-0063118
33.	POL00080889	Email chain re case closure - POLTD/1415/0064 - Glenmoriston. Most recent email from Elisa Lukas to Lin Norbury dated 10/04/2017	POL-0077452
34.	POL00081928	Emails between Nicola Sherry, Mandy Talbot, Stephen Dillley, Keith Baines and Clare Wardle re Callender Square & Lee Castleton dated 05/12/2006	POL-0078491
35.	POL00091088	Email chain between Jane Owen, Dave Pardoe, Nigel Allen and others RE: URGENT - Horizon System Helpdesk call logs dated 19/09/2012	POL-0090732
36.	POL00092640	Email from Martin Smith to Harry Bowyer and others; re Horizon Call Notes dated 21/08/2015	POL-0092218
37.	POL00094285	Email chain between Eunice Kirby and Michele Graves Re: New Cases dated 01/09/2009	POL-0093231
38.	POL00095547	Email from Doug Brown to Andy Hayward, Sue Richardson, Alison Bolsover and others re: Scope of declarations dated 21/04/2011	POL-0095130
39.	POL00095570	Email from Emily B Springford to Helen Watson re Preservation of data [BP-3A.FID472253] dated 01/12/2011	POL-0095153
40.	POL00104796	Royal Mail Corporate Security - Procedures & Standards - Surveillance P&S Doc 4 -X Version 2 dated 01/01/2006	POL-0080436
41.	POL00104814	Royal Mail Acquisition of Human Resource Information v2.0 dated 01/11/2007	POL-0080446
42.	POL00104912	"Royal Mail Group Ltd Criminal Investigation and Prosecution Policy" v1.1 dated 01/11/2010	POL-0080544
43.	POL00105417	Note re Post Office Ltd 2008/2009 Objectives and supporting	POL-0104525

		papers re compliance, conformance, losses and debt dated 03/03/2008	
44.	POL00106867	Email from Rob G Wilson to Dave Posnette, Doug Evanss, CC Andy Hayward, Dave King, Mandy Talbot re Challenges to Horizon dated 03/03/2010	POL-0105175
45.	POL00113468	Email from Matt Mowbray to Carol Ballan, Alisa Lukas and Amy Quirk re: The Grange dated 14/06/2016	POL-0112619
46.	RLIT0000038	POL FOI Response to Nick Wallis request for prosecution and conviction statistics between 1991 and 2020 dated 22/05/2020	RLIT0000038
47.	POL00139690	Email from John Scott to Susan Crichton CC John Scott re: Weds Call - Integrity of the Horizon System and Branch Support Programme	POL-0141391
48.	POL00139691	Email chain from Rob King to Jarnail Singh re: Regular call re Horizon issues	POL-0141392
49.	POL00139692	Email chain from Jarnail Singh to Rob King re: Regular Call re Horizon Issues	POL-0141393
50.	POL00139693	Email chain from Jarnail Singh @ to Hugh Flemington CC Rodric Williams re: Regular Wednesday Call re Horizon Issue [BD-4A.FID20472253]	POL-0141394
51.	POL00139694	Regular Call re Horizon Issues - Previous issues identified and further action to be taken	POL-0141395
52.	POL00139695	Email from Gayle A Peacock to Dave Posnett, Jeff Burke, Sophie Bialaszewski and others, Re: Weekly Horizon Call - Notes from last week and copy of Protocol document - Please do not forward	POL-0141396
53.	POL00139696	Protocol on Wednesday morning Telephone Conferences held for the purpose of Identification, Recording and Retention of Material which may be subject to Duties of Disclosure	POL-0141397
54.	POL00139697	List issues including resolution/output	POL-0141398
55.	POL00139698	Email from Rodric Williams to Andrew Parsons and Kayleigh-Lee Harding re: Horizon Weekly Report, Action Log Matrix Update - CLOSE ATM Router Upgrade Issue	POL-0141399
56.	POL00139699	Email from Anne Allaker to Dave Posnett, Sophie Bialaszewski, Jarnail A Singh and others re: Weekly Horizon Call Notes	POL-0141400

57.	POL00139700	Horizon Weekly Report- 'Regular Call re Horizon Issues', Wednesdays at 10.00am.	POL-0141401
58.	POL00139701	Various POL Teams and Bond Dickinson Weekly Meeting of 23 October 2013.	POL-0141402
59.	POL00139702	Bond Dickinson - Meeting Minutes Re: previous issues identified and further action to be taken	POL-0141403
60.	POL00139703	Action Log Matrix Horizon from 24/07/13 - 16/10/13 - Updated Following call	POL-0141404
61.	POL00139704	Email from Rodric Williams to Andrew Parsons and Kayleigh-Lee Harding - Re: Horizon Weekly Report, Action Log Matrix Update - CLOSE ATM Router Upgrade Issue	POL-0141405
62.	POL00139705	Table attached to the Weekly Horizon Call notes email	POL-0141406
63.	POL00139706	Email from Rodric Williams to Andrew Parsons and Kayleigh-Lee Harding re Horizon Weekly Report, Action Log Matrix Update - CLOSE ATM Router Upgrade Issue	POL-0141407
64.	POL00139707	Bond Dickinson Meeting minutes regarding previous issues identified and further action to be taken, New issues identified and Actions points	POL-0141408
65.	POL00139708	Action Log Matrix on Horizon updated following call on: 9 October 2013	POL-0141409
66.	POL00139709	ATM Losses Police Investigation report produced by Aftab Ali.	POL-0141410
67.	POL00139710	Email from Rodric Williams to Andrew Parsons and Kayleigh-Lee Harding re Horizon Weekly Report, Action Log Matrix Update - CLOSE ATM Router Upgrade Issue.	POL-0141411
68.	POL00139711	Bond Dickinson, Previous issues identified and new actions to be taken, Meeting minutes of 16/10/2013	POL-0141412
69.	POL00139712	Action Log Matrix Horizon -Table with Issues with Horizon that has been raised, action taken and the resolution/output found for the issue.	POL-0141413
70.	POL00139713	Email from Rodric Williams to Andrew Parsons and Kayleigh-Lee Harding re: Horizon Weekly Report, Action Log Matrix Update - CLOSE ATM Router Upgrade Issue.	POL-0141414
71.	POL00139714	Bond Dickinson Meeting Minutes of 20 Nov 2013 - previous issues identified and further action to be taken.	POL-0141415
72.	POL00139715	Action Log Matrix Horizon - 20 Nov 2013.	POL-0141416
73.	POL00139716	Email from Rodric Williams to Andrew Parsons and Kayleigh-Lee	POL-0141417

		Harding re: Horizon Weekly Report, Action Log Matrix Update - CLOSE ATM Router Upgrade Issue.	
74.	POL00139717	Action Log Matrix Horizon	POL-0141418
75.	POL00139718	Email from Rodric Williams to Andrew Parsons and Kayleigh-Lee Harding. Re: Horizon Weekly Report, Action Log Matrix Update - Close ATM Router Upgrade Issue	POL-0141419
76.	POL00139719	Bond Dickinson Meeting notes: Previous issues identified and further action to be taken	POL-0141420
77.	POL00139720	Bond Dickinson - Issues identified and further action to be taken	POL-0141421
78.	POL00139721	Action Log Matrix Horizon	POL-0141422
79.	POL00139722	Email from Rodric Williams to Andrew Parsons and Kayleigh-Lee Harding RE: Horizon Weekly Report, Action Log Matrix Update - CLOSE ATM Router Upgrade Issue	POL-0141423
80.	POL00139723	Horizon Weekly Report - Action Log Matrix Horizon	POL-0141424
81.	POL00139724	Email from Rodric Williams to Andrew Parsons and Kayleigh-Lee Harding re Horizon Weekly Report, Action Log Matrix Update - CLOSE ATM Router Upgrade Issue	POL-0141425
82.	POL00139725	Minutes of Regular Call re Horizon Issues	POL-0141426
83.	POL00139726	Bond Dickinson Regular Call re Horizon Issues - addresses Attendees: Rodric Williams, Martin Smith, Andrew Parsons and others	POL-0141427
84.	POL00139727	Action Log Matrix Horizon showing SPM issues and whether they have been escalated to the prosecution team	POL-0141428
85.	POL00139728	Bond Dickinson Regular Call re Horizon Issues. Attendees Rodric Williams, Martin Smith, Andrew Parsons and others	POL-0141429
86.	POL00139729	Regular Call re Horizon Issues	POL-0141430
87.	POL00139730	Meeting: Regular Call re Horizon Issues	POL-0141431
88.	POL00139731	Meeting: Regular Call re Horizon Issues	POL-0141432
89.	POL00139732	Regular Call Minutes re Horizon Issues including action points dated 31/07/13	POL-0141433
90.	POL00139733	Report by Dave Posnett re his Torch visit at Westerham (FAD 056948) on 11/04/13 where he was shown a real time anomaly with Horizon and with photos attached	POL-0141434
91.	POL00139734	Updated Action Log Matrix Horizon covering period 24/07/13 - 28/08/13	POL-0141435

92.	POL00139735	Bond Dickinson - Regular Call re Horizon Issues - 18/09/2013	POL-0141436
93.	POL00139736	Action Log Matrix Horizon	POL-0141437
94.	POL00139737	Email from Rodric Williams to Andrew Parson and Kayleigh-Lee Harding Re: Horizon Weekly Report, Action Log Matrix Update - CLOSE ATM Router Upgrade Issue	POL-0141438
95.	POL00139738	Bond Dickinson - Regular Call re Horizon Issues - Discussing Previous Issues & New Issues identified and action points. - 25/09/2013	POL-0141439
96.	POL00139739	Bond Dickinson - Regular Call re Horizon Issues - Call discussing Previous Issues identified and further action to be taken, New issues identified and Action points - 02/10/2013	POL-0141440
97.	POL00139740	Bond Dickinson - Regular Call re Horizon Issues - Call covering Previous issues identified and further action to be taken, New Issues identified and Action Points - 04/09/2013	POL-0141441
98.	POL00139741	Horizon Matrix Action Log	POL-0141442
99.	POL00139742	Bond Dickinson - Regular Call re Horizon Issues Minutes of 11/09/2023, attended by POL teams	POL-0141443
100.	POL00139743	Horizon Matrix Action Log	POL-0141444
101.	POL00139744	Email from Rodric Williams to Andrew Parsons, Kayleigh-Lee Harding RE: Horizon Weekly Report, Actions Log Matrix Update - Close ARM Router Upgrade Issue	POL-0141445
102.	POL00139745	Note Entry for Case - 37142 - POL Cases Rev time recording re discussing disclosure issues	POL-0141446
103.	POL00139746	Email from A Jarnail to Martin Smith Cc'ing Rodric Williams RE: Disclosure in Criminal cases	POL-0141447
104.	POL00139747	Email chain between Andy Cash, Steve Gelsthrope, Simon Clarke, Rupert Hawke and Martin Smith re: This morning's meeting	POL-0141448
105.	POL00139748	Note Entry for Case 37142 Summary - TC from JS. John Scott will be in conf call > MJS said not ap	POL-0141449
106.	POL00139749	Note Entry for Case 37142 Summary: MJS to SC: John S will not be on conf call. He admitted in an email to her last night to sending out instructs to shred.	POL-0141450
107.	FUJ00154926	Email from Prenovost Jean-Philippe to Tom Lillywhite, Guy Wilkerson and Gareth Jenkins cc: Penny	POINQ0161121F

		Thomas re ARQ194/2011 Matter in relation to Derby Post Office (005207) dated 14.09.2010	
108.	FUJ00156364	Email correspondence between Tim Jones and Bill Membrey RE Info for BNB pack (Loss prevention/IntelliQ) dated 16.12.2010	POINQ0162558F
109.	POL00004399	Branch Support Programme Terms of Reference dated 19.07.2013	-VIS00005467
110.	POL00043415	Bond Dickinson - POL Meeting Minutes dated 11.02.2015	POL-0039897
111.	POL00083930	Meeting Minutes for Regular Call re Horizon Issues dated 14.08.2013	POL-0080861
112.	POL00083935	Bond Dickinson Agenda for Regular Call re Horizon Issues, and action points from 21 August meeting dated 28.08.2013	POL-0080866
113.	POL00105074	Performance against objectives dated 26.02.2014	POL-0080706
114.	POL00105127	POL Security Team Objectives April 2014 – March 2015	POL-0080755
115.	POL00105417	Note re Post Office Ltd 2008/2009 Objectives and supporting papers re compliance, conformance, losses and debt dated 03.03.2008	POL-0104525
116.	POL00107877	Post Office Ltd: Investigation, Legal. Persis Williams - POLTD/1213/0127 dated 18.02.2013	POL-0106113
117.	POL00113109_020	Note entry for case 29560. Extract from bundle: POL v Ennonset Joseph dated 11.01.2013	POL-0110497_020
118.	POL00119858	Email from Rod Ismay to Mandy Talbot and John Scott RE: Challenges to Horizon dated 24.02.2010	POL-0125852
119.	POL00120479	Email chain from Rod Ismay to Rod Mark Burley, Ian Trundell, Dave Pardoe and others Re: Horizon Challenges - Draft report with attachments dated 29.07.2010	POL-0126171
120.	POL00122739	Email chain from Rob King to Andy Hayward Re: FW: Conduct of Interview Policy dated 02.09.2013	POL-0128968
121.	POL00139690	Email from John Scott to Susan Crichton CC John Scott re: Weds Call - Integrity of the Horizon System and Branch Support Programme dated 14.08.2013	POL-0141391
122.	POL00139691	Email chain from Rob King to Jamail Singh re: Regular call re Horizon issues dated 19.08.2013	POL-0141392
123.	POL00139692	Email chain from Jarnail Singh to Rob King re: Regular Call re Horizon Issues dated 20.08.2013	POL-0141393
124.	POL00139693	Email chain from Jarnail Singh to Hugh Flemington CC Rodric	POL-0141394

		Williams re: Regular Wednesday Call re Horizon Issue [BD-4A.FID20472253] dated 22.08.2013	
125.	POL00139695	Email from Gayle A Peacock to Dave Posnett, Jeff Burke, Sophie Bialaszewski and others, re: Weekly Horizon Call - Notes from last week and copy of Protocol document - Please do not forward dated 09.10.2013	POL-0141396
126.	POL00139696	Protocol on Wednesday morning Telephone Conferences held for the purpose of Identification, Recording and Retention of Material which may be subject to Duties of Disclosure dated 02.10.2013	POL-0141397
127.	POL00139725	Minutes of Regular Call re Horizon Issues dated 14.08.2013	POL-0141426
128.	POL00139726	Bond Dickinson Regular Call re Horizon Issues - addresses Attendees: Rodric Williams, Martin Smith, Andrew Parsons and others dated 21.08.2013	POL-0141427
129.	POL00139732	Regular Call Minutes re Horizon Issues including action points dated 31.07.2013	POL-0141433
130.	POL00139733	Report by Dave Posnett re his Torch visit at Westerham (FAD 056948) where he was shown a real time anomaly with Horizon and with photos attached dated 11.04.2013	POL-0141434
131.	UKGI00013223	CACD update PowerPoint dated 2016	UKGI024017-001
132.	FUJ00155516	Email to Penny Thomas from Tom Lillywhite cc Prenovost Jean-Philippe re Matter arising from ARQ 194/1011- Request for transaction records in relation to Derby Post Office dated 29/09/2010	POINQ0161710F
133.	POL00139853	Reply to Email POL00139851 (Email from John Scott to Rob King, Andy Hayward, Jarnail A Singh, Martin Smith. RE: providing a statement post second sight report) John Scott to Robert Daily, confirming they are briefed on the Second Sight report dated 12/08/2013	POL-0141029
134.	POL00139814	Email from Laura Irvine (BTO Solicitors) to John Scott, RE: Scottish prosecutorial system dated 16/03/2015	POL-0140990
135.	POL00139815	Email attachment to document POL00139814 - The Scottish prosecutorial system dated 16/03/2015	POL-0140991
136.	POL00139816	Auditor Training Presentation given by Laura Irvine and Lindsay	POL-0140992

		MacNeill from BTO Solicitors dated 09/12/2013	
137.	POL00031322	PO Risk & Compliance Committee Report dated 01.06.2009	POL-0028224
138.	POL00107696	Email from Emily B Springford to Helen Watson in re to JFSA Claims disclosure and evidence gathering dated 20/12/2011	POL-0105987
139.	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) dated 31/08/2011	VIS00012690
140.	POL00118152	Identification Codes (undated)	VIS00012741
141.	POL00119917	Security Operations Team - Case Compliance Check by Paul Southin - Ref: POLTD/1112/0066 dated 25/07/2011	POL-0120085
142.	POL00139745	Note Entry for Case - 37142 - POL Cases Rev time recording re discussing disclosure issues dated 01/08/2013	POL-0141446
143.	POL00139746	Email from A Jarnail to Martin Smith Cc'ing Rodric Williams RE: Disclosure in Criminal cases dated 01/08/2013	POL-0141447
144.	POL00139747	Email chain between Andy Cash, Steve Gelsthrope, Simon Clarke, Rupert Hawke and Martin Smith re: This morning's meeting dated 02/08/2013	POL-0141448
145.	POL00139748	Note Entry for Case 37142 Summary POL Cases Rev. Time Recording dated 14/08/2013	POL-0141449
146.	POL00139749	Note Entry for Case 37142 Summary: MJS to SC: John S will not be on conf call. He admitted in an email to her last night to sending out instructs to shred dated 14/08/2013	POL-0141450
147.	POL00105082	Staff data base and 'Continued Efficiency Programme Preference & CV Profile Pack' in relation to Criminal law cases dated 03/05/2014	POL-0080712