

Witness Name: Robert Daily

Statement No.: WITN08940100

Dated: 7 November 2023

POST OFFICE HORIZON IT INQUIRY

FIRST WITNESS STATEMENT OF ROBERT DAILY

I, Robert Daily, will say as follows:

Introduction

1. This witness statement is made to assist the Post Office Horizon IT Inquiry (the "Inquiry") with the matters set out in the Rule 9 Request dated 3 October 2023 (the "Request"). I have received advice and assistance from a lawyer in the preparation of this statement.

My professional background

2. I am an employee of Post Office Ltd ("POL") and hold the position of Security Manager. I joined POL on 17 December 1979. I have listed and summarised below the roles I have held throughout my career to the present date, and the approximate dates that I was in these roles, to the best of my recollection:

2.1. **Counter clerk (grade Postal Officer), 1979-1984.** This role involved

serving the general public. I had my own stock unit that I had to balance, this was completed on a paper balance sheet. At end of a 12-month probation period, I was sent to work in various branches before taking a permanent position at George Square Crown Office in Glasgow.

- 2.2. **Remittance Unit and TV Licence Records, 1984-1987.** Working in the Remittance Unit, I was placed on what were called "writing duties" and worked on the "float", meaning that I was sent to various departments to cover holidays and sick leave. I mainly worked in the Coin Centre in Thistle Street, Glasgow (part of the Remittance Unit), processing coin from Post Office branches and making up coin bags to send to Post Office branches. Being on the float during this time meant that I also worked in TV Licence Records, attending people's homes to check if they had a TV licence. If they didn't, they could pay at the door and a receipt would be given, or I would make a report to my Line Manager.
- 2.3. **Remittance Unit, 1987-1989.** During this period working in the Remittance Unit, my role involved processing inward and outward remittances from branches (this was before systems were computerised) and processing business banking from external customers.
- 2.4. **Cash Management, 1989-1993.** In this role I processed the Overnight Cash Holding figures sent in from Post Office branches and set daily targets for Post Office branches.
- 2.5. **Distribution, 1993-1997.** This role involved monitoring the performance of Remittance Units in the Northern Territory (Glasgow, Aberdeen, Dundee and Belfast). I visited the units to perform time and motion studies of the

work carried out.

- 2.6. **Security, 1997 to date.** Initially, I worked as a Postal Officer (between 1997-2004), ordering parts for parcel hatches, contacting contractors to attend branches to repair security equipment, project work (e.g. the screen 2000 upgrade of screens in Post Offices), arranging contractors, and liaising with Post Offices to arrange suitable dates for this work to be carried out.
- 2.7. Since 2005 I have worked as a Security and Investigations Manager, performing various roles. (I had applied unsuccessfully for this post in about 1999 or 2000, I recall). I describe this role in more detail later in my statement, but to summarise: in this role I investigate crime or suspected crime against POL, collate paperwork, identify suspects, arrange and conduct interviews and submit reports to the Casework team for decisions. In outline, when a decision is taken not proceed to prosecution, the case is closed; if a decision is taken to proceed, I submit a report to the Crown Office & Procurator Fiscal Service ("COPFS"). If the COPFS decides to proceed with a prosecution, I provide the productions (i.e. exhibits) supporting the case to COPFS. Latterly (as I explain elsewhere in this statement) BTO (aka Brechin, Tindall, Oates) Solicitors LLP, were employed to advise on reports and evidence. I liaised with BTO regarding the content of my reports to ensure I had covered all enquiries and there was sufficient evidence to either proceed to prosecution or not.
- 2.8. My "security" role includes attending branches to conduct security reviews, give advice, and check equipment is being used correctly. I also carry out

visits and/or phone calls after an incident at a branch (such as a robbery/burglary).

3. The Request asks me to give an account of my role as a Security/Investigations Manager from 2005, including how I became an Investigations Manager, the experience I had and the training I received, my understanding of what the role involved, who I reported to, and my opinion on the competence and professionalism of my colleagues and managers.
4. I joined the Security & Investigation team as an Investigation Manager in 2005. In 2011 my role changed to Security & Investigation Manager and my current role is as a currently Security Manager.
5. I applied for the job of Investigation Manager in 2004. The role was advertised as temporary for six months. I was successful in the interview and was appointed. When the temporary six-month period came to an end, I was informed my position was being made permanent.
6. I have been asked to consider my CV, the document at POL00105143. This contains an account of my skills and experience acquired in the role of Investigations Manager from January 2005. My recollection is that the Security & Investigations Team, as it was known then, underwent a reorganisation in 2008, and I was required to submit my CV.
7. I have also been asked to consider the document at POL00129121, which appears to be a statement I made in support of an application for the role of Investigation Manager. Again, I believe this to be from either 2008 or 2014 when I had to apply for my role as an Investigation Manager during the organisational restructures in those years.

8. All the experience and expertise I have has been acquired through working in my role. I have not pursued any formal qualifications for my role. I have also undergone training, and set out below an account of the training that I recall being given.
9. I say in my CV at POL00105143 that I had the knowledge and skills required for the position of Investigation Manager, and that I had knowledge of the corporate investigations policies and standards. I believe that to be an accurate assessment of my capabilities at that time, and now.
10. I have been based in Glasgow throughout the time I have had roles in the Security Team.
11. I recall that I was temporarily promoted to the role of Investigation Manager in 2000 and I recall attended some training at that time.
12. I recall that when taking up the role of Investigation Manager, I received 4-5 weeks training in the training unit above the Lavender Hill Post Office/Battersea Delivery Office in London. The training was given by Royal Mail Group accredited trainers who had experience of Investigations. The training covered the Police and Criminal Evidence Act 1984 ("PACE") Codes of Practice, Theft Act, carrying out searches, suspect offender interviews, cognitive witness interviews, taking witness statements (including the use of the Solicitor and Friends forms), the Regulation of Investigatory Powers Act, IIMARC (which refers to "information, intention, method, administration, risk assessment, communications, human rights and other legal issues") and NPA notifications ("NPA" refers to "non-Police Agency", and the notifications refer to notifications we made to the police about the criminal proceedings we undertook). After a few months in my role as an

investigations manager, I went to Rugby to attend further training, including courtroom training.

13. I can also recall being given onsite/field training on Scots Law, with the main difference at the time being that, in Scotland, a suspect was not offered a solicitor to be present at an interview.
14. I have also been asked to consider the performance and development review carried out for the 2013/14 at POL00105145. The document is my performance review for that year. Each year all managers within POL have to complete a six month and annual performance and development review ("PDR"). We have to reflect on what we had done and what we considered we had done well in each period.
15. When I took up the role of Investigation Manager, I reported to Judith (Jude) Trotter, and after she left I reported to Diane Matthews for a temporary period and then Andrew Daley. Afterwards, my recollection is that I had a series of managers: Lesley Frankland, followed by Keith Gilchrist, then Kevin Ryan and Simon Hutchinson (again for a temporary period) and then Helen Dickinson before she left in around 2019. I am now managed by Simon Talbot.
16. I have always viewed my colleagues and managers to be competent and professional.
17. In outline, I understood the role of Investigation Manager to involve investigating crime or suspected crime against POL by its staff, agents and their employees.
18. In my CV at POL00105143 I mentioned the Financial Evaluation form. Following an interview with a suspect, I was required to complete a Financial Evaluation

Sheet. This detailed the suspect's name, the Post Office branch and what they had said about the loss; the form also recorded my opinion on the loss and any financial details given by the suspect, including how they intended to repay any monies. Although I had to complete the form for Scottish cases, it was recognised that POL Financial Investigators did not have the authority to conduct a Financial Investigation in Scotland.

19. In my CV at POL00105143 I also mentioned case submission timescales. All cases had to be submitted within appropriate timescales. I can't fully recall the timescale, but I believe it may have been 12 days from the interview. I also mentioned in my CV I was in the process of making up a crib sheet as a reminder for the timescales, but I can't recall if I completed this.
20. In my CV at POL00105143 I also mention the Post Office Risk Assessment ("PORA") form. I was also required to complete and submit a PORA prior to interviews. I would contact the local police to ask if there were any concerns about the area to be visited including the area the suspected resided. Warning signs, if known, were to be captured along with a risk evaluation. This was then submitted to my Line Manager.
21. In my performance review for 2013/14, at POL00105145, I refer (at pages 3 and 4) to some work I did to secure specialist legal advice for Scottish casework, when Scottish cases were submitted to POL Legal Services for review. It was recognised within POL Legal Services and the Security Team that they weren't knowledgeable about Scots Law. I was concerned that I wasn't receiving the same legal support and I recall that I asked if Scottish solicitors could be sought to assist and advise on whether there was sufficient evidence to submit a file to

COPFS. I was advised to identify a suitable firm, and after researching some candidates I identified BTO LLP Solicitors. I believed they would be best suited as they employed a number of former Procurators Fiscal and had an office in Glasgow. I recall that I informed Jarnail Singh in POL Legal Services and I believe he contacted them and made arrangements for them to advise me on Scottish cases.

22. I dealt with Laura Irvine and Lindsay MacNeill at BTO, though mainly Laura. I recall that I arranged training for them on Horizon (which I think took place at the St Vincent Street Crown Office). I also made them aware of the Second Sight report, I either sent a copy or a link to the report. I mentioned on the document at POL00105145 that I advised BTO and the COPFS on cases at the time and archived cases in relation to the Second Sight review and cases where Horizon issues were raised, but I can't recall which cases.
23. In 2013 I also arranged for Laura Irvine and Lindsay MacNeill to provide Courtroom Awareness training for the auditors in Scotland (the document at POL00139816 is a copy of the presentation they gave). I and my colleague, Mike Stanway, Investigation Manager, also gave a presentation.
24. I also mentioned on the document at POL00105145 that I had reviewed the layout of the report I submitted to the COPFS to bring it into line with the Police. I exhibit the amended versions of the forms at POL00118102 and POL00118103 to my statement as WITN08940101.
25. I believe that from 2006 all reports all non-Police authorities were required to be submitted to the COPFS electronically. This was to be through the COPFS Specialist Reporting Agency (SRA) website. I attended training at the Procurator

Fiscal office in Glasgow. When my colleague Mike Stanway joined the team in 2011, I arranged for him to attend a training session at the same office. Mike was based in England, but he was partnered with my myself to assist in Scottish cases.

26. Paragraph 3 of the Request asks me to describe my role in relation to disciplinary matters, interviewing suspects, disclosure, litigation case strategy and liaising with other POL departments regarding the progress of cases.
27. Regarding disciplinary matters, the only relevant role that I can recall is that I would submit a disciplinary report to the relevant Contracts Manager following a suspect interview, if this was required.
28. Regarding suspect interviews, I both led in interviews and sat in interviews as a second officer.
29. Regarding disclosure, my role involved disclosing information to solicitors representing suspects prior to an interview. As part of the prosecution process in England I would be required to complete the documents of the type at POL00051526 and POL00051527, and other disclosure forms. These forms are not required in Scotland.
30. I was not involved in any litigation case strategy.
31. Regarding liaising with other POL departments, in my role I liaised mainly with Contract Managers, the Former Agent Debt team and Cash Management. I can't recall if I liaised with any other departments.

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

32. Paragraph 4 of the Request draws my attention to a series of policies and

procedures, and paragraph 5 asks me to explain the organisational structure of the Security Team, my role in the development and/or management of any of these policies and procedures and to explain the legislation, policies and/or guidance that covered the conduct of investigations.

33. There have been a lot of changes in personnel and teams over the period I have worked in the Security Team, and the account I have given here is to the best of my knowledge. When I joined there was a Head of Security and Investigations who oversaw the following:

33.1. The Investigation Team, with a Head of Investigations whose team dealt solely with investigations.

33.1. The Security Team, who visited branches to advise on the physical security (e.g. safes, alarms, screens etc.).

33.2. The Physical Security Team who dealt with updating and the purchase of new equipment (e.g. safes, alarms, screens etc.).

33.3. The Casework Team, dealing with investigation case files.

34. In 2008, there was a restructure. The post of Senior Security Manager was introduced, and they reported to the Head of Security. The Senior Security Manager oversaw the following:

34.1. The Commercial Team, though I can't recall their responsibilities.

34.2. The Physical Team, whose role was to visit branches to advise on the physical security in branches.

34.3. The Risk Team, who I believe dealt with Risk Management issues.

- 34.4. The Assets Team, whose role was to update and purchase new security equipment.
- 34.5. The Fraud Team, who undertook investigations.
- 34.6. The Casework Team, who were responsible for the administration of investigation case files.
35. In 2011 Investigation Managers also took on the role that had been carried out by the Physical Team, along with their investigations role.
36. There was a further restructure in 2014/2015. A number of new teams were created, and the heads of those teams reported to the Head of Security.
 - 36.1. The Financial Crime Team, whose remit included money laundering reporting and suspicious activity reports.
 - 36.2. The Crime Risk Team, whose remit included risk management and, Crime Risk models.
 - 36.3. The Physical Security Team, responsible for physical assets (e.g. safes, alarms, screens etc.).
 - 36.4. The Security Operations Team, responsible for security and investigations.
 - 36.5. The Post Office Security Team and Intel team, who shared the same personnel and acted as a point of contact for Law Enforcement, dealing with robbery and burglary reports and ARQ requests.
37. In 2019 the team was streamlined. The Head of Security post had two direct reports, as follows:

- 37.1. The Security Intelligence and Strategy Manager, responsible for the Post Office Security/Intel team.
- 37.2. The Security Operations Team Manager, who oversaw the Security Managers.
38. Paragraph 6 of the Request asks me to explain my role (if any) in the development and/or management of any of the policies listed in paragraph 4. To the best of my recollection, I was not involved in the development and/or management of any of these policies. (I refer later in my statement to the involvement I had in the development of the Mandatory Losses & Gains Policy for the Crown Office Network.)
39. Paragraph 7 of the Request asks me about the legislation, policies and/or guidance which governed the conduct of investigations by the Security Team during the period I worked within it and how these changed.
40. I am aware that there were several policies governing the conduct of investigations and that these were updated and sent to me over the period I worked within the Security Team. I would have read these, but I cannot recall the changes or when the documents were sent to me.
41. Paragraph 8 of the Request draws my attention to a series of documents and asks me to describe what, if any, impact there was on the conduct of investigations as a result of the separation of the Post Office from Royal Mail.
42. My recollection is that there was no change to the conduct of investigations following the separation from Royal Mail. If there was a need for a joint investigation, there was a process to be followed, as set out in the document at

POL00123312 (the Memorandum of Understanding between POL and Royal Mail on Joint Investigation Protocols).

43. Paragraph 9 of the Request asks me about the process for dealing with complaints about the conduct of an investigation by the Security Team. I don't recall having a complaint made against my conduct during an investigation by the Security Team. I'm unaware what the process would have been if a complaint was made.
44. Paragraph 10 of the Request asks me what (if any) supervision there was over criminal investigations conducted by the Security Team. Each month I was sent a "Cases on Hand" file listing all my cases. I had to provide updates on each case. If no update could be provided, you had to give a reason why.
45. Paragraph 11 of the Request asks me how Post Office policy and practice regarding the investigation and prosecution of Crown Office employees differed from the policy and practice regarding investigation and prosecution of subpostmasters ("SPMs"), their managers and assistants and if this changed during my time in the Security Team. I was aware of no such difference.
46. Paragraph 12 of the Request asks me to consider the document at POL00129339 (a "Project Initiation Document" for a project called "Security Compliance and Safety" and dated 27 February 2013) and I am asked about the purpose of the project outlined in the document and my involvement in the project.
47. I am named as one of the members of the "Working Group" at section 3 of the document. The purpose of the project, as I recall, was to maintain the integrity of the Supply Chain sites and the safety of people and assets. My involvement was to manage the undertaking of the Operation Stripe Testing and Premises Attack

Plans tests set out in the project for the Security Team North.

48. Paragraph 13 asks me to consider the email at document at POL00123863 (an email to me from Sharron Logan, Security Risk Programme Manager, dated 23 February 2016) and the document at POL00088124 (the "Mandatory Losses & Gains Policy for the Crown Office Network", version 1.0 dated 24 April 2013), and asks me to describe the circumstances in which I received this email and the nature of any involvement I had in reviewing this policy.
49. I led the Directly Managed Branch ("DMB") programme (formerly the Crown Office programme) around this time. The DMB programme involved each Security Manager visiting an agreed number of branches in their area during the financial year, usually at least one per month. They completed an electronic toolkit and uploaded it to the programme's Sharepoint site. The toolkit covered topics on cash management, losses and gains, security procedures and physical security. Having considered the email at POL00123863, I can recall reviewing the document at POL00088125 (a draft version of the Mandatory Losses & Gains Policy) and I recall suggesting amendments to it, mainly:
 - 49.1. The reference to "Multiple Stock Units" at section 3, paragraph 5.b. I made the suggestion that units should be checked every eight weeks, which is what ended up being written into the final policy (at section 4, paragraph 7.b.).
 - 49.2. The reference to "Snap Checks" at section 4, paragraph 7.a. I also made the suggestion that these should be carried out every eight weeks, which is what ended up being written into the final policy (at section 5, paragraph 9.a.)

50. I did recommend other amendments, but these did not make it into the final document POL00088124. I have located a version of the document at POL00088125 which shows the amendments that I suggested (marked in red) and which I recall returning to Sharron Logan. I exhibit this document to my statement as WITN08940102.

Audit and investigation

51. Paragraph 14 of the Request draws my attention to the document at POL00104821 (“Condensed Guide for Audit Attendance”, version 2 dated October 2008) and asks me to describe the circumstances in which an investigator would attend an audit of a branch and what an investigator’s role was.

52. I have reviewed the document and believe that it is a document intended for the use of auditors, not investigators. The circumstances in which I would attend an audit of a branch as an investigator would be if the Fraud Analysis team identified an issue at a branch: for example, excess overnight cash holdings or suppressed banking deposits. I might also be instructed to attend if the audit team on site identified a large discrepancy. My role on arrival was to discuss with the auditors their findings and gather any paperwork that would assist with a potential investigation.

53. Paragraph 15 of the Request asks me about who decided, if a shortfall was identified, whether an investigation into criminal activity should be conducted or if the case should be pursued as a debt recovery case, and the triggers/criteria for raising a fraud case.

54. The decision on whether an investigation would be pursued or not was, I believe,

made by Senior Management or Line Management within the Security Team. I am not aware of any local contract managers having any input in the decision making. Over the time I have worked in the Security Team, there were triggers for raising cases and they changed multiple times over the years. I can't recall all the levels at which triggers had been set, but I believe they ranged from £1,000 to £50,000.

The process followed by Security Team investigators when conducting a criminal investigation following the identification of a shortfall at an audit

55. Paragraph 16 of the Request asks, once a decision had been made to conduct a criminal investigation, what process the Security Team investigators followed in conducting their initial investigation.
56. On receipt of the Case Raised form, I would consider the enquiry. If it related to a Sub Post Office, I would contact POL Human Resources to request the postmaster's print-out and P356 assistant list, which included all Horizon User IDs. If it related to a Crown Office, I would ask for the employee printout. If the information in the Case Raised form related to an audit shortage, if the information had not already been provided, I would contact the lead auditor and request the relevant reports from Horizon, Office Balance, Stock Unit(s) balance(s) and snapshot(s) for any stock units, Cash Declarations, User IDs and any relevant forms.
57. If a suspect was identified, they would be contacted and invited to interview. They would be made aware of their right to a solicitor and their right to have a friend to be present at the interview (we would send the forms POL001(S) "Legal Rights Scotland" form and POL003 "Friend" form). Latterly I also told suspects that, if they were a member of the NFSP, they could contact their local rep for advice.

58. Once an interview had been conducted, the relevant paperwork was completed (for example the Suspect Offender report and Financial Investigation form) any further lines of enquiry made, any statements taken, then a report would be submitted for a decision to be made to prosecute or not.
59. In answering this question, I have considered the documents at POL00031005, POL00027863 and POL00030902, being the most recent versions of the "Conduct of Criminal Investigations Policy" (dated 2013, 2014 and 2018 respectively). I note the flowchart set out in the policies, which would have been the process to follow for a case in England. For Scottish cases, the process in the flowchart at page 3 of documents POL00031005 and POL00027863 would have been followed up to "Criminal Law Team to review the case file. Proceed with case?". I don't recall Cartwright King being involved in the process for Scottish cases; I believe they were returned to me with a decision from POL's Criminal Law team. If the decision was to proceed to prosecution, I would then submit the file to the COPFS. If the decision was not to proceed, that case would be closed. This was the process that was in place before we engaged BTO.

Decisions about prosecution and criminal enforcement proceedings

60. Paragraph 17 of the Request asks, once an initial investigation was carried out, who decided whether a SPM, their manager(s) and / or assistant(s) or a Post Office employee should be prosecuted and what considerations determined whether a prosecution was brought; I am also asked about whether this changed during my time the Security Team.
61. In England and Wales, I believe POL's Criminal/Legal team would be responsible for the decision on whether a Post Office employee, SPM, their managers or

assistants would be prosecuted by POL. I believe their decision would have been informed by the evidence detailed in the report.

62. In Scotland, only COPFS can bring prosecutions. A report would be submitted to them and, if they were requested, all productions (exhibits) were provided.
63. Paragraph 18 of the Request asks, if a branch was run by a SPM, whether the SPM's local contract manager had any input into this decision-making process and if this changed during my time the Security Team. I am not aware of local Contract Managers having any input to the decision making during my role in the Security Team.
64. Paragraph 19 of the Request asks me about the test applied by those making prosecution and charging decisions and the factors which were considered at the evidential and the public interest stage. I'm not aware what test was applied in the decision making or what factors were considered at the evidential and the public interest stage. I played no role in the decision-making, and would expect the Criminal Law team to decide in England and the COPFS in Scotland.
65. Paragraph 20 of the Request asks what legal and other advice was provided to those making prosecution decisions. I am not aware what advice legal or otherwise was provided to those making decisions about whether to prosecute and what charges to bring.
66. Paragraph 21 of the Request asks in what circumstances steps were to restrain a suspect's assets by criminal enforcement methods. Following an interview, I completed a Financial Evaluation Sheet with the financial details provided by the interviewee. These were submitted with my report. These would be passed to a Financial Investigator to action if necessary. POL Financial Investigators didn't

have the authority to restrain a suspect's assets in Scotland. I believe Police Scotland have Financial Investigators, but I'm not aware of their powers. When I submitted a case through the COPFS Specialist Reporting Agency website, I was asked if compensation was sought. This didn't guarantee compensation would be granted; that decision was ultimately for the court.

67. Paragraph 22 of the Request asks who decided whether criminal enforcement proceedings should be pursued and the factors they considered when making decisions. I'm not aware if it was the Financial Investigators or senior management who decided if enforcement proceedings should be pursued or the factors considered.

Training, instructions and guidance to investigators within the Security Team

68. Paragraph 23 of the request asks what instructions, guidance and / or training were given to investigators within the Security Team on a range of topics and how was this provided.

69. Regarding training in interviewing suspects, I recall this was covered in my initial training when I joined the Security Team in 2005. We were taught interview techniques and how to ask questions. There were role play exercises, with the trainers taking on the roles of suspects; we were given a scenario and tasked with interviewing a suspect.

70. Regarding taking witness statements, I recall that this was also covered in my initial training. We were given scenarios and had to practice taking statements from the trainers and fellow attendees.

71. Regarding conducting searches, I recall that as part of my initial training that I

have described above, we were taken to a house in the Police College near London. I assisted in conducting a search, looking for items that had been pre-placed in the property. We were also trained on how to complete the necessary forms.

72. Regarding the investigator's duties in carrying out investigations, I recall during the initial training that we were taught to ensure all evidence is obtained, lines of enquiries are completed, mitigating circumstances are considered and investigated, and interviews are conducted within guidelines. All activities taken were to be recorded on the Event Log.
73. Regarding obtaining evidence in the course of an investigation, also during initial training we were taught that the investigator must obtain all original documents (for example, in the event of an audit shortage, audit cash sheets, Horizon reports printed at the time of the audit, Branch Trading Statements and Horizon reports produced by the branch).
74. The initial training also taught us about obtaining evidence from third parties who might hold relevant evidence. For example, banks statements, if it was suspected a shortfall was due to the monies being deposited into a suspect's bank account using Horizon. Also, ARQ requests to Fujitsu in order to obtain Horizon data in various cases (for example, to investigate deposits into bank accounts in Post Office Card Account cases involving a vulnerable person duped into making multiple withdrawals).
75. Regarding an investigator's disclosure obligations, the initial training taught us that, in England, it is the duty of the investigator provide a record of all information obtained and to disclose all relevant information to the prosecution and defence.

I learned on taking up my role in Scotland that it is the duty of the investigator to do the same as in England, with the exception information is provided to the COPFS. The COPFS considers whether the information meets the disclosure test before disclosing the information. I attended some training on disclosure provided by, and have located a copy of the presentation that was given which I exhibit to my statement as POL00129134.

76. Regarding drafting investigation reports, the initial training taught us that the Offender report must contain a "preamble", for example, in the case of an audit shortage, the details of the audit, the suspect interview (including evidence put to the suspect), exhibits/productions, details of witness statements, any denials/admissions made, any follow up enquiries and a summary of the evidence.
77. Paragraph 24 of the Request draws my attention to the document at POL00121680 (an email from Andrew Daley dated 6 September 2010 that was sent to me and a number of others, together with its attachments at POL00104837, POL00104848, POL00064059 and POL00124232) and I am asked where I was based when I received this email, whether this was the first time I had been sent these materials and if any presentation about them was given.
78. The documents relate to some procedures and standards that had been developed in relation to committal papers. At the time I received the email at document POL00121680 I was based in Scotland. I can't recall exactly when I received the materials, but it is my belief that this would have been the first occasion on which I saw them. I can't recall receiving the presentation that is

referred to in the email.

79. Paragraph 25 of the Request asks me to consider the document at POL00129144 (an email from Roslyn Simpson dated 5 October 2010 and the attachment at document POL00129145) and I am asked to explain the circumstances in which I was due to attend the "Specialist Reporting Agencies – Disclosure Course" referred to in these documents, whether I attended it and whether I was based in Scotland at the time.
80. I believe I was asked to attend the training as I was the investigation manager covering Scotland (being based in Scotland at that time). I recall that I did attend on 20 October 2010.
81. Paragraph 26 of the Request draws my attention to a series of documents relating to casework management and paragraph 27 asks me a series of questions about them.
82. I don't recall being provided with the 2000 and 2002 versions of the Casework Management document at POL00104747 and POL00104777 during my time in the Security Team. I cannot therefore say what I might have understood the instructions / guidance given in 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 to mean. Had I considered them at the time, I don't think I would have considered them to be relevant to disclosure obligations in relation to information about Horizon bugs, errors and defects, as I wasn't aware of any bugs, errors or defects until I became aware of the Second Sight report.
83. To the best of my recollection, the compliance checks referred to in David Posnett's email of 23 May 2011 at POL00118096 had been introduced prior to

2011 to apply a consistent approach in investigations and the submission of the "green jackets". ("Green jacket" refers to a folder which, on the outside, displays the case file number, the type of enquiry and the branch name. It also displays the date you received the file, who you send it to, the date sent etc. The jacket contains all the forms relevant to the case, information, reports, with Appendix folders for witness statements (Appendix A), evidence (Appendix B) and correspondence (Appendix C.) I can't recall exactly when they were introduced or if there were any inconsistencies in investigations or green jacket submissions prior to the compliance checks being introduced. The checks I believe were conducted by the Casework Managers.

84. I had no role in relation to the development, management or amendment of the suite of compliance documents attached to David Posnett's email.
85. I have been asked to set out what I understood by paragraph 2.15 of the document at POL00118101 ("Guide to the Preparation and Layout of Investigation Red Label Case Files – Offender reports & Discipline reports"), how this related to the document at POL00118102 (Offender Report template), and its relevance to the Post Office's disclosure obligations (and in particular as they related to information about Horizon bugs, errors and defects).
86. I don't exactly recall the document at POL00118101, but I do recall that there were requirements which governed the preparation and layout of case files. My understanding of paragraph 2.15 of the document at POL00118101 is that any failures in "security, supervision, procedures and product integrity" identified that led to a crime being committed were to be included in the Offender report.
87. I have considered the document at POL00118104 (titled "Identification Codes")

and attached to David Posnett's email of 23 May 2011). I don't recall ever having seen this document. I do not know who drafted the document. I find the descriptions attached to the codes to be disgusting and racist. As to why Security Team investigators were instructed to assign identification codes to suspected offenders, my understanding is that identification codes were already in place when I started as an investigation manager. I took them as being a standard entry of the Offender and Discipline reports. I have some recollection that I had a file, possibly an Excel file, which described IC codes 1 to 4, but I cannot now locate this. I do know that it didn't resemble the document at POL00118104. In my experience, the only codes I recall ever having to use regularly were IC1 and IC4.

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

88. Paragraph 28 of the Request asks what analysis (if any) was done by Security Team investigators of Horizon data when a SPM / SPM's manager(s) or assistant(s) / Crown Office employee(s) attributed a shortfall to problems with Horizon. If a shortfall was claimed to be attributed to Horizon, I cannot recall if data and a statement was requested from Fujitsu or only a statement. I didn't carry out analysis on the Horizon system, this was conducted by Fujitsu.
89. Paragraph 29 of the Request asks ARQ data requested from Fujitsu as a matter of course when a shortfall had been identified and the relevant SPM / SPM's manager(s) or assistant(s) / Crown Office employee(s) attributed the shortfall to problems with Horizon. ARQ data was not requested from Fujitsu as a matter of course. It would only have been requested if it was relevant to an enquiry.
90. Paragraph 30 of the Request asks whether ARQ data, when it was obtained from

Fujitsu, was provided to the SPM in question as a matter of course. I don't recall the data ever being provided to the SPM.

91. Paragraph 31 of the Request asks me to consider the documents at FUJ00225725 (email correspondence between July and September 2010 relating to a request I made for ARQ data for Bridgeton Post Office) and FUJ00226055 (emails between Cartwright King solicitors and Gareth Jenkins of Fujitsu, 28 November 2012) and I am asked to describe the circumstances in which I would have contact with Fujitsu when I worked within the Security Team and the relevant contacts at Fujitsu.
92. Initial contact with Fujitsu was made through our Security Team. On reviewing the document at FUJ00225725 I can see that my initial request was made to "Post Office Security". I was not in direct contact with either Penny Thomas or Gareth Jenkins. I would only contact Fujitsu if it was specifically required for case. The documents at FUJ00156984, FUJ00156985, FUJ00156994, FUJ00156998 and FUJ00157004 show some emails that I exchanged with Andy Dunks, who worked in Security Operations within Fujitsu, during 2017-2018. I contacted Andy Dunks directly as I had been copied in on correspondence with him and therefore had his contact details.
93. Paragraph 32 of the Request asks what role I understood Gareth Jenkins to have relation to the criminal prosecutions he was involved in. I recall Gareth Jenkins' name, and note that he was sent an email in November 2012 (document FUJ00226055) which refers to him providing a report in a case in 2012 in which I was to be a witness. Other than that I don't recall any involvement he had in relation to criminal prosecutions.

94. Paragraph 33 of the Request asks me to what extent did I considered Gareth Jenkins to be acting as an expert witness, my understanding of the rules governing independent expert evidence and who provided advice or assistance to me in this in this regard. Other than what I described in paragraph 93 above, I don't recall Gareth Jenkins' involvement in relation to criminal prosecutions. Other than those cases where Fujitsu staff were asked to provide witness statements, I don't recall having to request an expert witness in any of my cases.

Relationship with others

95. Paragraph 34 of the Request asks me to describe my involvement with Cartwright King Solicitors, including the level of interaction that I typically had in a case (and the roles I had) and my contacts. Personally, I had very little interaction with Cartwright King Solicitors, as my involvement was mainly with Scottish cases. I do remember a meeting with Cartwright King Solicitors regarding the case mentioned in the document at FUJ00226055. As I recall, the case related to a shortage at Winlaton Post Office, in north-east England, and I was the lead investigator. I recall that the meeting was with Rachel Panter and another person who may have been Martin Smith. I can't recall the details of the meeting or what was discussed.

Involvement in the Criminal Case Studies

Prosecution of Peter Holmes

96. Paragraph 35 of the Request asks me to provide a full account of my involvement in and my recollection of the criminal prosecution of Peter Holmes and I am asked to consider the documents referred to in Paragraph 36.

97. Paragraph 37 of the Request asks me how and when I first become involved in

this case. I can't recall exactly how I first became involved, but I expect I would have been contacted by my Line Manager at the time and informed that I would be leading the case, with Chris Knight as the second officer.

98. Paragraph 38 of the Request asks me if I was aware of any allegations made by Peter Holmes relating to the reliability of the Horizon IT system and, if so, what I thought the significance of this was. Mr Holmes indicated during interview that the loss may be down to the Horizon system. At the time, I don't believe I would have been aware of the significance of this, as I don't recall being aware of any issues with Horizon at the time. Mr Holmes said he couldn't explain the losses, and didn't believe anyone else in the office had stolen any money.
99. Paragraph 39 of the Request asks me about my role in relation to the audit of Jesmond Branch undertaken on 18 September 2008. I was not involved in the decision to conduct an audit at Jesmond Post Office and I don't recall why the audit was undertaken. I believe I was emailed the audit report on 18 September 2008; I believe this to be the case because I would have had to have had the report before I travelled down to Newcastle on 19 September. It would have been provided by Mike Webb, Lead Auditor, or the Casework team.
100. Paragraph 40 of the Request asks me to explain how the search at Jesmond Post Office was conducted and my role, if any, in that search. I can't now recall conducting a search at Jesmond Post Office.
101. Paragraph 41 of the Request asks me about the decision to search Mr Holmes' home on 19 September 2008 and the conduct of the search. The decision to carry out a search followed POL policy: we were instructed to conduct searches to preserve any evidence. I can't recall how we conducted the search, but looking

at the document at POL00060805, I can see that I was accompanied by Chris Knight and Mark Haddrell. We would have searched one room at a time, with Mr Holmes being present. Looking at page 7 of the document at POL00060805, I can see that I recorded the first item, found by myself. After this, I can see that all other items found were recorded against Chris Knight and Mark Haddrell, which suggests they continued the search.

102. Paragraph 42 of the Request asks me whose decision was it to interview Mr Holmes. Again, decision the decision to interview Mr Holmes followed policy. As an investigator, I was expected to interview a suspect as part of an enquiry.

103. Paragraph 43 of the Request asks what my view was of Mr Holmes' assertion in his interview (at page 8 of the document at POL00050208) that the only way he could explain the losses were "it's the Horizon that's let us down". My view was that Mr Holmes' assertion needed following up. I can see that there was a request made for the ARQ data (as I discuss elsewhere in my statement) but I can't recall if a request for a witness statement from Fujitsu was made. I can't remember now what my view would have been about Mr Holmes' assertion about Horizon.

104. Paragraph 44 of the Request asks me to consider my investigation reports at documents POL00050334 and POL00050832. In particular, my report at POL00050334 refers to a request being made to ascertain whether Horizon equipment at the Jesmond Branch was faulty. I note that at POL00050832, at page 7, my report says that checks had revealed no problems with Horizon. I cannot recall what checks were carried out in relation to Horizon at the branch, who carried out the checks or what the results were. I've considered all the documents and can't find anything in relation to the request or the results of the

checks.

105. Paragraph 45 of the Request asks me to consider the document at POL00050255 (the Suspect Offender Reporting form) which advises that Mr Holmes was suspended on the authority of Brian Trotter, and asks what input, if any, I had in the decision. I had no input into the decision to suspend Mr Holmes.
106. Paragraph 46 of the Request has asked me to consider the witness statements of Thelma Crerand (Assistant Manager, Jesmond Post Office) (POL00047293), Vicky Mitchell (Post Office Assistance, Jesmond Post Office) (POL00047294), Doreen Corcoran (Counter Clerk, Jesmond Post Office) (POL00051515) and Jenera Begum (Counter Clerk, Jesmond Post Office) (POL00043887) and about my role in relation to obtaining these statements. I can't recall who decided that each of the individuals should provide a witness statement or at what stage in the investigation was it decided that they should provide witness statements.
107. My role in taking witness statements involved asking each of the witnesses questions, and I captured their answers/comments on the statement. I don't recall giving the witnesses any information prior to them giving their statements, in this case or indeed in any other case. I asked all the witnesses if they were aware of any problems with Horizon and all said they weren't aware of any problems.
108. Paragraph 47 of the Request asks me to consider the financial evaluation sheet completed for Mr Holmes at document POL00043951, the enquiries made to Barclays bank at document POL00050821, the results of those enquiries at document POL00060806 and the witness statement of Sunil Khanna in relation to the salary paid to Mr Holmes, at document UKGI00014640, and asks me about the investigation into Mr Holmes' finances.

109. I can't recall what the investigation into Mr Holmes' personal finances revealed. I recall that I did obtain the statement from Sunil Khanna in relation to Mr Holmes's wages. I can't recall the investigation or who I would have reported the results of those investigations to. I'm not aware if the outcome of those investigations factored into the decision whether there was sufficient evidence to charge Mr Holmes.

110. Paragraph 48 of the Request refers me to the documents at POL00043951 (the Financial Evaluation Sheet completed in this case) and POL00051984 (witness statement of Laura Currie of the Alliance and Leicester dated 26 August 2009) and asked me about the investigations into the finances of Mr Holmes' wife's business. The only bank statement that I can recall obtaining related to Mr and Mrs Holmes' joint account, I don't recall obtain statements relating to her business account.

111. Paragraph 49 of the Request asks me to explain any further sources of information I considered during the investigation. I can't recall if any other sources of information were considered during the investigation.

112. Paragraph 50 of the Request asks if any Horizon data (and in particular ARQ logs) requested from Fujitsu in this case. I note that on page 2 of my investigation report dated 6 October 2008 (POL00050334) I said that "Horizon data has been requested". I do not believe I would have said this if it hadn't been requested. Similarly, page 6 of my investigation report dated 30 January 2009 (POL00050832) refers to Horizon data having been "received and analysed". Again, I do not believe I would have said this if this hadn't been done. I note the Court of Appeal's judgment in *Josephine Hamilton & Others v Post Office Limited*

(POL00113278) which advised (at paragraph 229) that ARQ data was obtained but that it was not clear if it was disclosed.

113. Paragraph 51 of the Request asks if I obtained legal advice at any stage of the investigation. Having considered various documents referred to in the Request, I can see that I corresponded with Juliet McFarlane, Principal Lawyer in the POL Criminal Law Division, at various stages of the case. This would have been to inform her of progress, seek advice on the next steps and discuss the expert accountant's report.

114. Paragraph 52 of the Request asks what role, if any, I played in the decision to prosecute Mr Holmes and refers to the documents at POL00050865 (memo from Terry Crowther, Fraud Team, dated 4 February 2009) and POL00050912 (memo from Juliet McFarlane, dated 16 February 2009).

115. I have also reviewed the reports I made at documents POL00050334 and POL00050832. In both reports I said that I saw no reason why POL should not proceed with prosecution. This was my view based on the evidence gathered. The decision was not ultimately mine to take. The file would be submitted to the DAM (I think this stood for "Decision Authority Manager") to decide whether POL should proceed to prosecute or not. The file was then sent to Legal Services for a legal/final decision.

116. Paragraph 53 of the Request refers me to the documents at POL00066227 (Juliet McFarlane's attendance note of her call with me on 10 November 2009) and POL00043846 (the Schedule of Charges) and asks what role, if any, I played in deciding on and/or drafting the charge faced by Mr Holmes. I would have played no part in drafting the charge faced by Mr Holmes at document at POL00043846.

I don't recall the actual conversation I had with Juliet McFarlane and recorded in the document at POL00066227 and whether it came before or after the drafted charge.

117. Paragraph 54 of the Request asks me who was the disclosure officer in this case and paragraph 55 asks me to explain my role in relation to disclosure. As the lead investigator I would have been the disclosure officer. My role would have been to ensure all appropriate material used and unused was disclosed to the prosecution and defence.

118. Paragraph 56 of the Request asks me what role I played in preparing for the prosecution and refers to the documents at POL00050940 and POL00050978 (letters I sent to Gosforth Magistrates Court in February and March 2009), POL00051080 (a memo I sent to Juliet McFarlane on 9 March 2009), POL00051205 (a memo Juliet McFarlane sent to the Fraud Team, and copied to me, on 18 March 2009) and POL00066225 (Juliet McFarlane's attendance note of her call with me on 13 August 2009).

119. My letters to the Magistrates Court were in connection with arranging a court date. I obtained a summons and sent it to Mr Holmes. I then informed Juliet McFarlane that the summons had been served by Royal Mail Special Delivery. Juliet McFarlane then informed me of the prosecuting agent on behalf of POL. Document POL00066225 states I held a discussion with Legal Services regarding Mr Khanna's statement and the documents mentioned in his statement. I can't recall the details of the conversation. I would also have prepared the committal bundle, but as I was not so experienced in dealing with cases in the English courts, I recall that I was provided with assistance to do this.

120. Paragraph 57 of the Request asks me to consider the documents at POL00052028 and POL00052037 (emails referencing a request I made for the Event Logs for Jesmond Post Office in July 2009) and asks me to describe the disclosure requests made by the defence and how these were responded to. The request I made was, I believe, for the alarm logs for Jesmond Post Office. These would have been disclosed to the defence.

121. Paragraph 58 of the Request asks what, if any, further enquiries I conducted after receiving the defence expert report and about my response to the report. I recall receiving the expert accountant's report (at document POL00052103). I cannot recall conducting further enquiries or what my response to the report, but having considered document UKGI00014638 (an email I sent to Juliet McFarlane on 19 August 2009), I can see that I was of the opinion that, without seeing the business' daily takings for the period in question, I couldn't agree with the expert accountant's conclusions.

122. Paragraph 59 of the Request asks me to consider Mr Holmes' defence statement, dated 30 July 2009 (at document POL00052178 and POL00052193) and asks me about my observations of the statement and my role in addressing the matters raised in it. In particular, it asks me how I responded to Mr Holmes' statement that "I do not believe that Royal Mail has conducted a thorough investigation and did not consider any alternative in relation to the allegation".

123. I do not recall receiving the defence statement but accept I would have received it, as I am copied into the memo dated 5 August 2009 at POL00052193. I don't recall what view, if any, I had about the contents of the defence statement.

124. Paragraph 60 of the Request asks me to consider the defence representations,

dated 24 August 2009 (at POL00052389) which were copied to me on 4 September 2009 (under cover of the document at POL00052391) and asks me about my views on the representations and on the defence accountant's findings. I don't recall receiving the defence representations. I note at document POL00053521 that the daily takings records were obtained, but I don't recall viewing these.

125. Paragraph 61 of the Request refers to the document at POL00060822 (Juliet McFarlane's memo of 25 September 2009 recording that the Crown rejected the basis of plea of false accounting but not theft) and asks what role I had in deciding to reject the basis of plea. I don't recall having any input into the decision to reject the basis of plea, or being aware of the rationale on which the decision was based.

126. Paragraph 62 of the Request asks me to consider the further defence representations dated 16 November 2009, at document POL00053521 and copied to me on 24 November 2009 (under cover of the document at POL00053598) and asks me about my response to these representations, whether a conference with counsel was arranged and my role in that conference. I can't recall responding to the representations or if a conference with counsel was arranged.

127. Paragraph 63 of the Request refers to the document at POL00053795 referencing that Mr Holmes pleaded guilty to a revised indictment on 22 December 2009, and asks what my views were about this at the time. I don't recall having any views on this at the time.

128. Paragraph 64 of the Request refers to the document at POL00054149 (a memo

dated 17 February 2010 recording the sentence imposed on Mr Holmes) and asks me what my response was. I don't believe I made a response at the time.

129. Paragraph 65 of the Request refers to the documents at POL00054544 and POL00054543 (containing emails exchanged in March 2010 regarding enforcement proceedings) and POL00054790 (the Case Closure Reporting form I sent on 23 May 2010) and asks me what criminal enforcement proceedings were taken against Mr Holmes and about my involvement in these proceedings. I believe consideration was given to recovering the money from Mr Holmes, initially, but page 3 of the document at POL00054543 shows that POL resolved to seek recovery from the SPM. My only involvement was to forward a debarment notice regarding Mr Holmes, as I mention on the Case Closure Reporting form at POL00054790.

130. Paragraph 66 of the Request asks me to describe any further involvement I had in this case. Other than what I have described elsewhere in this statement, I don't recall any further involvement in the case.

131. Paragraph 67 asks me what my reflections are now on the way the investigation and prosecution of Mr Holmes was conducted by the Post Office and the outcome of the case, and my attention is drawn to the judgment of the Court of Appeal in *Josephine Hamilton & Others v Post Office Limited* at document POL00113278.

132. I have considered the Court of Appeal judgment, and in particular paragraphs 226 to 230 relating to Mr Holmes. I noted the finding at paragraph 229 that ARQ data was obtained but that it was not clear if it was disclosed. I acknowledge that ARQ data was obtained, but cannot recall whether or not it was disclosed. If it was not disclosed, I cannot now offer a reason why that was.

Prosecutions in the Devolved Nations

133. Paragraph 68 of the Request draws my attention to a series of documents and paragraph 69 asks me to describe how I became involved in the investigation and prosecution of cases in the devolved nations, particularly Scotland. I was recruited to the Security Team to work in Scotland as I based in Glasgow.

134. Paragraph 70 of the Request asked about my experience of the Scottish legal system before I became involved in this work. I had no experience of the Scottish Legal system prior to my role as a Security Manager.

135. Paragraph 71 of the Request asks me to describe the process by which cases were investigated and prosecuted in Scotland, how the process in Scotland differed from England and Wales and any ways in which the process in Scotland changed during the time I was involved.

136. The conduct of investigations in Scotland was similar to England and Wales, the key difference was in the prosecution of cases. As I have described elsewhere in this statement, the prosecuting authority in Scotland is the COPFS. All cases, whether they be Police or non-Police cases, have to be submitted to the COPFS, who then decide whether to proceed to prosecution or not. In around 2006, it became a requirement that non-Police authorities had to report cases through the COPFS Specialist Reporting Agency website. On inputting a case, you had to input a charge to proceed to submission.

137. The process also differed in that in Scotland corroboration of evidence is required; you need to have two separate sources of evidence. For example, if a person transacts a deposit into their bank account using Horizon without putting the money in the drawer, the two sources of evidence could be drawn from the

Horizon data, bank statements, CCTV, or witness evidence.

138. Another difference was that prior to 2010, a suspect didn't have a right to a solicitor. This changed in 2010 with the Supreme Court decision in *Cadder v HM Advocate*. From 2010, anyone being interviewed under caution had to be offered a solicitor to be present. The email exchanges documented at POL00121659 are referring to the procedural changes which would be required following this decision.

139. Another difference is that, in England, we are only required to summarise the tape transcripts from an interview, while in Scotland we are required to type out the full tape transcripts from an interview.

140. Paragraph 72 of the Request asks me to provide details of the individuals I worked with on cases in Scotland. Those that I can recall were Raymond Grant and Shirley Stockdale, who were based in Scotland along with Judith Trotter, Tony Robertson, Diane Matthews, Steve Bradshaw, Mike Stanway, Andrew Wise, Kevin Ryan and Suzanne Winter.

141. Paragraph 73 of the Request asks me to describe any difficulties I encountered while working on cases in Scotland. I can't recall any particular difficulties.

142. Paragraph 74 of the Request refers me to the email chain dated 12 August 2013 at document POL00139853 and asks me to explain the circumstances in which I was approached by the Crown for comment on prosecution cases; about any discussions I had with John Scott, Jarnail Singh or any other individual in the Post Office about this request; and who made the decision that I would not provide a statement and the reasons for this decision.

143. I can't recall the circumstances in which I was approached by the Crown or any discussions with John Scott or Jarnail Singh. It may be that the only contact I had with John Scott or Jarnail Singh was by email, but I can't now be certain about that. It seems to me likely that the decision that I would not provide a statement would have been one for John Scott and/or Jarnail Singh, and I suspect the reason for the decision was possibly that I was not qualified (legally or otherwise) to provide such a statement, but I can't be certain about this.

General

144. Paragraph 75 of the Request refers me to the documents at POL00124103 and POL00124105 (email correspondence in December 2017 referring to the outcome of a meeting about prosecution) and asked me to describe the circumstances in which I received the email and my understanding of the approach of the Post Office to "testing a case in the criminal court prior to the civil hearing". I can't recall the exact circumstances in which I received the email, I expect it was sent in order to update the Security Team on the business' position on prosecutions. I vaguely recall discussions on a test case but not the reasons behind it.

145. Paragraph 76 of the Request asked me to what extent (if any) I considered a challenge to the integrity of Horizon in one case to be relevant to other ongoing or future cases. I didn't consider any challenge to any one case being relevant to other ongoing cases or future cases. I recall that when I attended team meetings, the updates we were given were that a Subject Matter Expert would be coming "on board" and that the Horizon system was robust with no integrity issues.

146. There are no other matters that I consider are of relevance to the Inquiry's terms

of reference that I would like to draw to the attention of the Chair.

Statement of Truth

I believe the content of this statement to be true.

Signed:  _____
Robert Daily (Nov 7, 2023, 2:12pm)

Dated: 07 Nov 2023

Index to First Witness Statement of Robert Daily

<u>No.</u>	<u>URN</u>	<u>Document Description</u>	<u>Control Numbers</u>
1.	POL00105143	Curriculum Vitae – Robert Daily, undated	POL-0080769
2.	POL00129121	"Robert Daily – Investigation manager – Northern Team (Glasgow)", undated	POL-0135052
3.	POL00105145	2013/14 Year End Performance and Development Review	POL-0080770
4.	POL00139816	Auditor Training delivered by BTO LLP Solicitors, 9 December 2013	POL-0140992
5.	POL00118102	POL Template Offender Report	VIS00012692
6.	POL00118103	POL Template Offender Report	POL-0134173
7.	WITN08940101	POL Template Offender Report by Robert Daily	WITN08940101
8.	POL00051526	R v Peter Holmes, Schedule of Sensitive Material completed 19 May 2009	POL-0048005
9.	POL00051527	R v Peter Holmes, Schedule of Non-Sensitive Unused Material completed 19 May 2009	POL-0048006
10.	POL00123312	Memorandum of Understanding between POL and Royal Mail on Joint Investigation Protocols, undated	POL-0129511
11.	POL00129339	Project Initiation Document for "Security Compliance and Safety" project, dated 27 February 2013	POL-0135224
12.	POL00123863	Email from Sharron Logan, Security Risk Programme Manager, 23 February 2016	POL-0130046
13.	POL00088124	"Mandatory Losses & Gains Policy for the Crown Office Network", version 1.0 dated 24 April 2013	POL-0085182
14.	POL00088125	Draft version of "Mandatory Losses & Gains Policy for the Crown Office Network"	POL-0085183
15.	WITN08940102	POL Mandatory Losses & Gains Policy - Crown Office Network - with Robert Daily amendments	WITN08940102
16.	POL00104821	"Condensed Guide for Audit Attendance", version 2 dated October 2008	POL-0080453
17.	POL00031005	"Conduct of Criminal Investigations Policy", version 0.2 dated 29 August 2013	POL-0027487
18.	POL00027863	"Conduct of Criminal Investigations Policy", version 0.3	POL-0024504

		revised 10 February 2014	
19.	POL00030902	"Conduct of Criminal Investigations Policy", version 2.1 dated 4 September 2018	POL-0027384
20.	POL00129134	Presentation by Scottish Prosecution College: "Disclosure", Kirsty McGowan, Policy Division, Crown Office, undated	POL-0135064
21.	POL00121680	Email from Andrew Daley, 6 September 2010	POL-0127942
22.	POL00104837	Attachment to email from Andrew Daley dated 6 September 2010	POL-0080469
23.	POL00104848	Attachment to email from Andrew Daley dated 6 September 2010	POL-0080480
24.	POL00064059	Attachment to email from Andrew Daley dated 6 September 2010	POL-0060538
25.	POL00124232	Attachment to email from Andrew Daley dated 6 September 2010	POL-0127633
26.	POL00129144	Email from Roslyn Simpson, 5 October 2010	POL-0134939
27.	POL00129145	"Specialist Reporting Agencies – Disclosure Module Joining Instructions", 20 October 2010	POL-0134940
28.	POL00104747	"Investigation Policy - Casework Management", version 1.0, March 2000	POL-0080387
29.	POL00104777	"Investigation Policy - Casework Management", version 4.0, October 2002	POL-0080417
30.	POL00118096	Email from David Posnett dated 23 May 2011	VIS00012685
31.	POL00118101	"Guide to the Preparation and Layout of Investigation Red Label Case Files – Offender reports & Discipline reports", undated	VIS00012690
32.	POL00118102	Offender Report template, undated	VIS00012691
33.	POL00118104	"Identification Codes", undated	VIS00012693
34.	FUJ00225725	Email correspondence July and September 2010 re ARQ data for Bridgeton Post Office	POINQ023184F
35.	FUJ00226055	Emails between Cartwright King solicitors and Gareth Jenkins, 28 November 2012	POINQ0232172F
36.	FUJ00156984	Email correspondence March-May 2017 "RE: ARQ request Craigton – POLTD/1617/0023"	POINQ0163179F
37.	FUJ00156985	Email correspondence May 2017 "RE: Witness statement"	POINQ0163180F

38.	FUJ00156994	Email correspondence March-May 2018 "FW: ARQ request Craighton – POLTD/1617/0023"	POINQ163189F
39.	FUJ00156998	Email correspondence March-May 2018 "FW: ARQ request Craighton – POLTD/1617/0023 – Project Bramble – Legally Privileged and Confidential"	POINQ163193F
40.	FUJ00157004	Email correspondence March-June 2018 "RE: ARQ request Craighton – POLTD/1617/0023"	POINQ163199F
41.	POL00060805	Audit report, 18 September 2008	POL-0057284
42.	POL00050208	Record of Tape Recorded Interview, 19 September 2008	POL-0046734
43.	POL00050334	Investigation report, 6 October 2008	POL-0046813
44.	POL00050832	Investigation report, 30 January 2009	POL-0047311
45.	POL00050255	Suspect Offender Reporting form, 22 September 2008	POL-0046813
46.	POL00047293	Witness statement of Thelma Crerand, 11 May 2009	POL-0043773
47.	POL00047294	Witness statement of Vicky Mitchell, 11 May 2009	POL-0046687
48.	POL00051515	Witness statement of Doreen Corcoran, 11 May 2009	POL-0047994
49.	POL00043887	Witness statement of Jenera Begum, 22 July 2009	POL-0040366
50.	POL00043951	Financial Evaluation Sheet, undated	POL-0043772
51.	POL00050821	Letter from Robert Daily to Barclays Bank, 30 January 2009	POL-0047300
52.	POL00060806	Barclays Bank statements, July 2007-August 2008	POL-0057285
53.	UKGI00014640	Witness statement of Sunil Khanna, 22 July 2009	UKGI025433-001
54.	POL00051984	Witness statement of Laura Currie, 26 August 2009	POL-0048463
55.	POL00113278	Court of Appeal judgment in Josephine Hamilton & Others v Post Office Limited [2021] EWCA Crim 577	POL-0110657
56.	POL00050865	Memo from Terry Crowther, Fraud Team, 4 February 2009	POL-0047344
57.	POL00050912	Memo from Juliet McFarlane, Principal Lawyer, 16 February 2009	POL-0047391
58.	POL00066227	Attendance note made by Juliet McFarlane, 10 November 2009	POL-0062706

59.	POL00043846	Schedule of Charges, undated	POL-0040325
60.	POL00050940	Letter from Robert Daily to Gosforth Magistrates' Court, 17 February 2009	POL-0047419
61.	POL00050978	Letter from Robert Daily to Gosforth Magistrates' Court, 9 March 2009	POL-0047457
62.	POL00051080	Memo from Robert Daily to Juliet McFarlane, 9 March 2009	POL-0047559
63.	POL00051205	Memo from Juliet McFarlane to Fraud Team, 18 March 2009	POL-0047684
64.	POL00066225	Attendance note made by Juliet McFarlane, 13 August 2009	POL-0062704
65.	POL00052028	Emails 7 July 2009 "Jesmond SPSO Contract No: 704055"	POL-0048507
66.	POL00052037	Emails 9 July 2009 "Fw: Jesmond SPSO ROMEC CONTRACT 704005"	POL-0048516
67.	POL00052103	Expert Accountant's Report, Peter Smith, 28 July 2009	POL-0048582
68.	UKGI00014638	Email Robert Daily to Juliet McFarlane, 19 August 2009	UKGI025431-001
69.	POL00052178	Defence Statement, 16 July 2009	POL-0048657
70.	POL00052193	Memo from Juliet McFarlane to Post Office Security, 5 August 2009	POL-0048672
71.	POL00052389	Letter McKeag & Co Solicitors, 24 August 2009	POL-0048868
72.	POL00052391	Memo from Juliet McFarlane to Post Office Security, 4 September 2009	POL-0048870
73.	POL00060822	Memo from Juliet McFarlane to Post Office Security, 25 September 2009	POL-0057301
74.	POL00053521	Letter McKeag & Co Solicitors, 16 November 2009	POL-0050000
75.	POL00053598	Memo from Juliet McFarlane to Post Office Security, 24 November 2009	POL-0050077
76.	POL00053795	Memo from Juliet McFarlane to Post Office Security, 21 January 2010	POL-0050274
77.	POL00054149	Memo from S Andrews to Post Office Security, 17 February 2010	POL-0050628
78.	POL00054544	Emails 30 March 2010 "Re: Fw: REGINA v PETER ANTHONY HOLMES CASE NO: POLTD/0809/0128 14 th May 2010 for Confiscation proceedings."	POL-0051023

79.	POL00054543	Emails 30 March 2010 "Re: Fw: REGINA v PETER ANTHONY HOLMES CASE NO: POLTD/0809/0128 14 th May 2010 for Confiscation proceedings."	POL-0051022
80.	POL00054790	Case Closure Reporting form, 23 May 2010	POL-0051269
81.	POL00121659	Emails 22/23 June 2010 "Fw: Legal Rights Scotland"	POL-0127921
82.	POL00139853	Emails 12 August 2013 "RE: PF"	POL-0141029
83.	POL00124103	Email Mark Raymond 20 December 2017 "Prosecution meeting outcome"	POL-0130245
84.	POL00124105	Emails 20/21 December 2017 "RE: Prosecution meeting outcome"	POL-0130247