

Witness Name: Suzanne Winter

Statement No.: WITN10400100

Dated: 2nd January 2024

POST OFFICE HORIZON IT INQUIRY

FIRST WITNESS STATEMENT OF SUZANNE WINTER

I, Suzanne Winter, will say as follows:

Introduction

1. I am a former employee of Post Office Ltd and held the position of Fraud Investigator.
2. This witness statement is made to assist the Post Office Horizon IT Inquiry with the matters set out in the Rule 9 Request dated 28th November 2023. I have spoken with the Witness Liaison Team in Post Office but have not relied on any information from them other than having asked for assistance in locating my start date at Post Office. In preparing this statement I have been assisted by Mr Fintan Canavan of DAC Beachcroft solicitors.

Background

3. I commenced my working life in 1972 as a book clerk in The Old Bleach Linen Mill, Randalstown and in 1973 I started employment as a counter assistant in

Randalstown Sub Post Office. I was very proud to start work in a Post Office as my father was a Postman and my mother had previously worked for the Post Office and it was an institution held in very high repute. The Sub Postmaster in Randalstown provided initial training and kept a watchful eye on me and my work until I was competent in all aspects of counter work. I assisted with the preparation of accounting documents for the weekly balance and manually completing the balance sheet. This was of course prior to the introduction of Horizon.

4. In early 1976 I sat the Postal and Telegraphs Officer examination and after interview was successful in obtaining employment in Ballymena Crown Office. I received three weeks training and worked at the counter for two years. After two years I progressed to work in the secure area of the office covering various jobs. Dispatching cash/stock remittances to Sub Post Offices, accepting cash/stock from Sub Post Offices, Acting Postal Executive in charge of the incomings/outgoings of the safe, Counter supervisor and responsible once a week for accumulating the counter balances of all the stock units held in the office and balancing with the figures held for the safe. These positions were usually held for a period of between four and six months when you would then change to give you experience in all of the different work involved. After a number of years I progressed to the writing room where I covered a number of jobs. The Wages Duty entailed preparing the weekly wages for each postman employed in the Ballymena Post Office and surrounding smaller delivery offices. Post Office Sales Representative Assistant, this job mainly involved making telephone calls to businesses to

promote and sell Post Office products and services. Datapost Duty entailed calculating monies owed by businesses using the Datapost express service. Household Delivery Duty involved gathering all paperwork every week relating to the customer and to the relevant delivery postman and balancing.

5. A vacancy arose in the Planning Room for an auditor's position. I applied and after interview I was successful in obtaining the post. I worked closely with my line manager and he would give you a weekly plan for offices to be audited. As far as I am aware my manager and myself would usually be the only people in the office who would be aware of the Post Offices to be visited. Before visiting each office I needed to check stock/cash figures, staff employed, the area to be visited and risk assessment. The majority of offices I would visit by myself or my manager would accompany me if it involved a larger post office.

6. In 1988/1989 there was a major reorganization within the business and the majority of staff was moved to work in Royal Mail House Belfast. Around this time the business was split into two companies. Royal Mail and Post Office Ltd. Initially I remained an employee of Royal Mail from March 1989 and worked in Customer Services in Royal Mail House Belfast in the International Return Letter section. Unfortunately after working in the section for six months I opened a letter bomb. This incident meant I was unhappy to continue to work in this section because of the risks and I was moved to the Business Centre as an administrator covering various tasks. Arranging business

collections, household deliveries, setting up Private Boxes and assisting the two Postal Services Representatives to promote the business.

7. A few years later I applied for a Sales Managers post in Customer Services and was successful. This job entailed managing a portfolio of businesses and meeting financial monthly targets. I worked in this post until around 1997/1998 when I was successful in my application to move to the Royal Mail Security Team as an Investigator. The job entailed detecting offences against Royal Mail (for example complaints about money going missing in the mail, undelivered post and working with the Drugs investigators and HMRC) and initiating prosecutions to the Police.
8. I received initial in house training provided in the office by Royal Mail and also completed three weeks training in the Royal Mail Training School in Milton Keynes. The training covered all aspects of the role including witness statement taking, analyzing data, interviewing suspects, PACE, Risk Assessments, and Surveillance. I also attended Thames Valley Police Training College and undertook a search course. During the course of this job I worked with other investigators in the Royal Mail team, Police and Her Majesties Customs and Excise.
9. In 2001 after another business reorganisation I moved to Post Office Ltd based in Queens House, Belfast as an Investigations Manager in the Post Office Security Team. I received initial training in the office and then, once again, I attended three weeks intensive training in the Training College in

Milton Keynes. The training again covered all aspects of the role including witness statement taking, analyzing data, full disclosure, interviewing suspects, PACE, Risk Assessments, working on the Horizon system, preparing case files with any updated information. I also re-attended Thames Valley Police Training College and undertook a search course. Once I had received the training I was then mentored for six months by Les Thorpe my line manager. I had the grade of manager but did not have anyone working to me so was effectively a one person department.

10. After another re-organisation my role expanded to include investigating robberies, burglaries and Tiger Kidnap situations. At various times the job title changed but the job content remained the same. I remained in the Investigation Team until December 2014 when I left the business under voluntary redundancy which was available at the time. When I first came into the role there was no agreed procedure or protocol in place and I transferred across the basic procedures and protocols from the Royal Mail role I had held and agreed an MOU with the police and PPS as to co-operation in investigations and prosecutions.

11. I had no role in Disciplinary matters as they were dealt with by the Post Office Contracts Manager with regard to cases involving Subpostmasters. Crown office staff was dealt with by Human Resources and a Senior Manager. As an investigator my role was to interview Post Office employees and agents who were suspected of, or had admitted to, committing a criminal offence and to ascertain the facts in the enquiry. I produced a Suspect Offender File to the

Casework Team for compliance and forwarding to the Head of Security for comment and recommendations. If Head of Security recommended progressing the case I prepared an Evidential Report for the PSNI to get their opinion. If the PSNI felt sufficient evidence to progress I then completed a Prosecution File and handed to PSNI for the PPS. It was for the PSNI to progress the file to Public Prosecution Office. Before a suspected criminal interview I gave full disclosure to any Legal representative who was present. The legal representative then was offered the opportunity to a meeting with their client before the interview commenced. Should any case progress to the court, the PSNI and PSO would assist with disclosure. I was not involved in any decision to prosecute nor did I become involved in agreeing litigation strategy. When progressing cases I liaised with various Post Office departments depending on the nature of the case. I can recall working with Post Office Contracts Managers, Area Managers, Postmaster Federation Representatives, Audit Team, Security Casework Manager, Post Office Helpline, Financial Recovery Investigators, Post Office Legal Services, Finance Service Centre which included the lottery team and cheque team. At one point in the time I worked in Investigations the PSNI underwent a re-organisation and my initial files were sent to a local solicitor in Belfast, McCartan Turkington Breen, and they reviewed the file and directed any further investigations before the file went to the PSNI and DPP. If the Head of Security, the PSNI, the PPS (or McCartan Turkington Breen) felt they needed further investigations, more detail or further reports they would request these and I would conduct the further investigations.

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

12. I have been provided with and considered the following documents and while a number of them look familiar there are also a number I do not recall. A few are perhaps related more to Royal Mail and I had left that business when ([POL00030902]) was issued.

- i) Casework Management Policy (version 1.0, March 2000) ([POL00104747]) and (version 4.0, October 2002) ([POL00104777]);
- ii) Rules and Standards Policy (version 2.0, October 2000) ([POL00104754]);
- iii) "Investigation Procedures Policy (version 2.0, January 2001) ([POL00030687]);
- iv) Disclosure Of Unused Material, Criminal Procedures and Investigations Act 1996 Codes of Practice Policy (version 1.0, May 2001) ([POL00104762]);
- v) "Security Managers' Guide to the Prosecution Support Office" (May 2001) ([POL00121455]) (see paragraphs 6 and 33);
- vi) "Royal Mail Group Security – Procedures & Standards – Arrest Procedures" (Version 2.0, May 2001) ([POL00104760]) (in particular paragraph 3.15);
- vii) Appendix 3 of Investigation Policy "Notes of Interview – Northern Ireland" (Version 5.0, November 2002) ([POL00039952]);

- viii) "Royal Mail Group Security – Procedures & Standards – Searching" (September 2006) [**POL00094163**] (see paragraph 2.3 in particular);
- ix) Police and Criminal Evidence (Northern Ireland) Order 1989 (1 March 2007) ([**POL00121591**]);
- x) "Royal Mail Group Ltd Criminal Investigation and Prosecution Policy" (1 December 2007) ([**POL00030578**], which appears to be substantially the same as the policy of the same date with a variation on the title at [**POL00104812**]) (see, in particular, section 3); - 8 –
- xi) "Royal Mail Group Security - Procedures & Standards - Standards of Behaviour and Complaints Procedure" (version 2, October 2007) ([**POL00104806**]);
- xii) "Royal Mail Group - An Inspection of the Royal Mail Group Crime Investigations Function" (July 2008) ([**POL00121607**]);
- xiii) "Royal Mail Group Crime and Investigation Policy" (version 1.1, October 2009) ([**POL00031003**]);
- xiv) "Post Office Ltd - Security Policy - Fraud Investigation and Prosecution Policy" (version 2, 4 April 2010) ([**POL00030580**]);
- xv) "Post Office Ltd Financial Investigation Policy" (4 May 2010) ([**POL00030579**]);
- xvi) "Royal Mail Group Security - Procedures & Standards - The Proceeds of Crime Act 2002 & Financial Investigations" (version 1, September 2010) ([**POL00026573**]);

- xvii) "Royal Mail Group Security - Procedures & Standards - Initiating Investigations" (September 2010) ([**POL00104857**]);
- xviii) "Royal Mail Group Ltd Criminal Investigation and Prosecution Policy" (version 1.1, November 2010) ([**POL00031008**]);
- xix) Post Office Ltd Financial Investigation Policy (version 2, February 2011) ([**POL00104853**]);
- xx) Post Office Ltd Anti-Fraud Policy (February 2011) ([**POL00104855**]); xxi) "Royal Mail Group Policy Crime and Investigation S2" (version 3.0, April 2011) ([**POL00030786**]);
- xxi) "Royal Mail Internal Information Criminal Investigation Team- Casefile Construction England, Wales and Northern Ireland" (Version 1.0, June 2011) ([**POL00104877**]);
- xxii) "Royal Mail Internal Information Criminal Investigation Team - Appendix 1 to 8.2 Suspect Offender Reports, Preamble Guide, England, Wales and Northern Ireland" (Version 1.0, June 2011) ([**POL00104879**]);
- xxiii) "Royal Mail Internal Information Criminal Investigation Team – 8.2 Guide to the preparation of suspect offender reports, England, Wales and Northern Ireland" (Version 1.0, June 2011) ([**POL00104881**]);
- xxiv) "Royal Mail Internal Information - Casework Management and PSO Products and Services" (Version 1.0, June 2011) ([**POL00104888**]) (particularly paragraph 9.3);
- xxv) "Post Office Prosecution Policy" (version 1.0, 1 April 2012) ([**POL00031034**]);

- xxvi) "Post Office Ltd PNC Security Operating Procedures" (August 2012) ([POL00105229]);
- xxvii) "Post Office Limited: Internal Protocol for Criminal Investigation and Enforcement (with flowchart)", (October 2012) ([POL00104929]);
- xxviii) "Undated Appendix 1 - POL Criminal Investigations and Enforcement Procedure (flowchart)", (October 2012) ([POL00105226]);
- xxix) The undated document entitled "POL – Enforcement & Prosecution Policy" ([POL00104968]);
- xxx) "Post Office Limited: Criminal Enforcement and Prosecution Policy" (undated) ([POL00030602]);
- xxxi) "Conduct of Criminal Investigations Policy" (version 0.2, 29 August 2013) ([POL00031005]);
- xxxii) "Post Office Prosecution Policy England and Wales" (1 November 2013) ([POL00030686]) (in particular paragraph 1.2);
- xxxiii) "Conduct of Criminal Investigations Policy" (version 3, 10 February 2014) ([POL00027863]);
- xxxiv) "Conduct of Criminal Investigations Policy" (September 2018) ([POL00030902]).

13. From what I can recall the Security Team included The Head of Security, Policy and Standards Manager, Senior Casework Manager and Compliance Manager. Casework Team, Fraud Investigators covering Scotland, England, Wales and Northern Ireland. Legal Services, Financial Investigators, Physical Security Managers. There may have been others but I cannot recall. There

were numerous re-organisations throughout my time in the business and changes to titles and roles within teams making it difficult to be specific about some of these matters. Significant changes that I can recall was a particular reorganisation when there was a major cut back in the number of investigators. I cannot recall exactly when this happened. During another business reorganisation additional posts were created such as Financial Investigators and a Fujitsu Liaison Officer. I believe the Audit Team was integrated into Security at some point although I am unsure of that. The team in NI was always small and so many of the re-organisations had little direct day to day impact on us.

14. To the best of my knowledge I was not involved in the development and/or management of the above policies. I was, as mentioned before, involved working with Post Office Security, the PSNI and Public Prosecution Service to develop a Memorandum of Understanding for prosecution cases in NI.

15. Any legislation, policies or guidance governing the conduct of investigations conducted by the Security Team during my period of working within that team, if relevant, would have been communicated usually by Policy and Standards or the Casework team. From my recollection a different caution was issued in Northern Ireland and the Police and Criminal Codes of Practice in Northern Ireland were followed rather than their England and Wales equivalent. The correct routines for NI were applied. Different, NI specific, forms would also be used when conducting a formal interview. After completing a Suspect Offender file and receiving authority from the Head of Security to progress, an

Evidential Report would be prepared and handed to the PSNI. I would discuss the report with the PSNI Investigating Officer and receive advice if further statements or documents etc. were required. Once the Evidential file was completed to the satisfaction of the Police I produced a Prosecution File. This file would be handed to the Police for forwarding to PPS. Once the PPS had read the file I would meet with them to discuss.

16. I was not working in investigations when the Post Office separated from Royal Mail and joined Post Office at a later date.

17. I do not recall the process for dealing with complaints about the conduct of an investigation by the Security Team but if I had to speculate I think it would be dealt with by a Senior Manager and filtered to your line manager. I do not remember any complaints being made around my investigations.

18. In respect of supervision over criminal investigations conducted by Security Managers this would be overseen by your Team Leader/ Line Manager and also the Casework/Compliance manager. Ongoing cases would be discussed by regular telephone contact, monthly one to one meetings, attending interviews and Team meetings. A casework compliance check was carried out to ensure everything had been completed correctly and that the same standards were being applied across the wider team and all required documentation was in place. At a monthly meeting your cases would be discussed in one to one sessions and if any further actions needed to be taken these would be discussed and agreed. I also received guidance and

instruction from PSNI and PPS which was often of greater impact as it addressed the NI specific issues.

19. I have been asked how Post Office policy and practice regarding investigation and prosecution of Crown Office employees differed from the policy and practice regarding investigation and prosecution of SPMs, their managers and assistants. From what I can recall there was no difference in the investigations I undertook with regard to Crown office staff and Sub Postmasters. From recall there was a reduction in the number of audits conducted due to cutbacks and if assistants were suspected of committing a crime the SPM was advised to report the matter to the police, as it was more in line with an employment matter, and provide our contact details instead of the Post Office Security Investigation Team being directly involved.

Audit and investigation

20. I have been asked to consider the document "Condensed Guide for Audit Attendance" ([POL00104821]). I do not recall this document. From what I can recall if the auditor on site, reported a significant loss or if the Counter Clerk/Sub Postmaster volunteered they had inflated the cash figure an investigator would be asked to attend. Attendance would also be required if the investigator had requested the audit due to concerns with the accounts or if another department had concerns. The investigators role on attendance would be to introduce themselves, their second officer and the audit team. They would explain why they were visiting the office, issue a caution, advise the person of their Legal Rights and Post Office Friend Rule, make a

notebook entry recording that. The investigator would remain onsite and await the final outcome of the audit and report to the contracts manager and to Line Manager. If there was no reasonable explanation for a loss identified the investigator would remind the person they were still under caution and invite them for a formal interview. This interview was arranged at an appropriate venue. My official notebooks were stored in a safe in my office or may have been sent to one of the security teams. I did not retain these myself when they were complete and do not have any at my home.

21. I have been asked if a shortfall following an audit of a Post Office branch was identified who determined whether an investigation was raised. During my employment there were different triggers to raise an investigation but cannot recall what they were. I received my investigation cases from the Casework Management Team and recall the Financial Service Centre would be contacted for information relating to the lottery, cheques etc. When the branch was run by a SPM the relevant contract manager was only involved in the disciplinary decision making. I do not recall the triggers or criteria for raising a fraud case.

22. I have been asked to consider section 7 of ([POL00085977]) regarding the differences between the audit process between Northern Ireland and England and Wales. I do not recall any specific differences between Northern Ireland and England and Wales in the audit process. I had limited involvement in the Post Office audit processes as I was in the Investigation team.

Decisions about prosecution and criminal enforcement proceedings

23. Following an investigation in Northern Ireland a Suspect Offender file would be prepared and forwarded to Head of Security for any recommendations. They would review the information available and make any decisions. The decision would be communicated to the Casework Manager and the file would then be returned to me. Once the Casework Manager authorised progression of the file I produced an Evidential Report and handed it to the PSNI. The PSNI would consider the material and discuss the Report with me, if any additional material would be required and how to set out and produce a Prosecution file for progression to the Public Prosecution Service. This process was put in place by me after I joined the Security Team. Over the years this process developed and changed. An example of a significant change was when the PSNI had a reorganisation and Post Office Cases were processed through Ernie Waterworth, Solicitor, McCartan, Turkington and Breen as mentioned earlier.

24. I have been asked to consider ([POL00031034]) paragraphs 4.3 and 4.4 and I do not recall any instances of disagreement arising in relation to investigations or prosecutions. I am unable to give an opinion if the Post Office maintained a consistent prosecution policy as I was not involved with prosecution decisions. In NI the PSNI reviewed the files and sought clarification before the file went to the PPS and it was the PPS who decided if a prosecution would proceed. I did not have a role in that decision making and had no involvement in any England and Wales prosecution cases so I cannot comment on the policy or consistency of the application of any policy.

25. I cannot recall any circumstances where steps were taken to restrain a suspect's assets by criminal enforcement methods such as confiscation proceedings were considered. I believe that Trained Financial Investigators would make these decisions. I was not, as far as I recall, ever involved in any cases of this sort nor do I recall ever being consulted about such steps.

26. I have no recall as to who decided whether criminal enforcement proceedings should be pursued nor do I recall any incident when that decision was made.

Training, instructions and guidance to investigators within the Security Team

27. I have been asked what instructions, guidance and /or training were given to investigators within the Security team particularly in relation to Northern Ireland, and how was this provided:

- I received training in house before attending a three week training course in the Post Office Training College in Milton Keynes. All aspects of interviewing individuals suspected of a criminal offence, taking witness statements, conducting searches, obtaining, reviewing and complete disclosure of evidence and report writing was covered. I was tested to ensure I passed the level of competence required to conduct PACE 1984 Codes of Practice interviews.
- I also attended subsequent workshops and refresher courses when there were significant changes to legislation or working arrangements within the Casework Team.

- After training I was then mentored by my line Manager Les Thorpe for 6 months.

28. To assist with Northern Ireland Law I would have taken advice from PSNI or PPS. There would be circumstances where information would be sought from third parties who might hold relevant evidence where shortfalls were identified in branch eg: The Paid Order Unit. In NI the various departments were relatively small and we maintained close contact.

29. With regard to Fujitsu I cannot recall if data would be requested in all cases of cash shortfalls as we had been assured by Fujitsu that the Horizon system was completely reliable. These assurances were given from Senior Managers at meetings and during Horizon Training. I did not get involved with Fujitsu until working in the business for a number of years when we were informed we had to produce an expert witness statement from Fujitsu in investigations. The decision to get expert reports was not made by me and I cannot recall who first advised me that I should get a report. I recall there were protocols to follow should you require their assistance and Horizon data would not always be requested if admissions had been made. I found the Fujitsu evidence statements hard to follow as they often had a lot of technical detail in them.

30. A Suspect Offender Report would be included in the case file and sent to Casework Manager to forward to the Head of Security for a decision to be made with regard to recommendations. I also worked at Crown Office Counters using the Horizon system during the Christmas periods when non counter staff would go in to local offices to provide support.

31. I have been asked to consider ([POL00121467]), ([POL00121485]), ([POL00129311]), ([POL00158977] and [POL00158978]). I do not recall these forms.

32. I have also viewed the following documents: Casework Management document ([POL00104747]) (version 1.0, March 2000) and ([POL00104777]) (version 4.0, October 2002). David Posnett's email dated 23 May 2011 ([POL00118096]) and ([POL00118108]), ([POL00118109]), ([POL00118101]), ([POL00118102]), ([POL00118103]), ([POL00118104]), ([POL00118105]), ([POL00118106]) and ([POL00118107]).

33. I cannot recall if I was provided with either the 2000 or 2002 version of the Casework Management document when I was an investigator within the Post Office Security Team. With regard to instructions given on page 2 of the 2000 version and on page 2 of the 2002 version. I do not recall the documents. From recall there was no prosecution process in place in Northern Ireland until after 2000. Compliance checks were carried out by the Casework Manager against a scoring sheet of 100. The scoring mark was discussed with my Team Leader at monthly meetings. I recall this was to ensure consistency and a high standard of all investigations and my understanding of the compliance documents attached to the email from Dave Posnett dated 23 May 2011 was to help preparing case papers. I do not recall having any role in relation to their development or management. My understanding of the document entitled "Guide to the Preparation and Layout of Investigation Red

Label Case File" was to advise of any identified failures in security as shown as the second from last point on document ([POL0011802]) after copy reports and tape summary. This could be where passwords for the Horizon system had been shared, high levels of cash held in the counter tills, sharing of dates stamps, safe door left open/unlocked etc. I do not know who drafted the document entitled "Identification Codes," but I do recall seeing it. I do not recall anyone ever raising the question if the document should be amended or suggesting it was inappropriate. My understanding of assigning identification codes to suspected offenders was the information was required to complete documents for Non Policing Authorities for entry onto the PNC (Police National Computer).

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

34. When I held the position of Investigator/Fraud Manager within the Security Team and any SPM/SPMs manager(s) or assistant(s)/ Crown Office employee(s) attributed any discrepancy to the Horizon system, I would have asked them to give details of the problems and if the matter had been reported to the Helpdesk or their Area Manager. The matter would be raised with my line manager and Casework Manager and a decision would be made to request Horizon data to be reviewed for the period in question. From my recall Horizon transactions could be viewed on Credence but only a few months. An ARQ needed to be authorised if you needed to view further back than this. During my work as a Post Office Investigator I was unaware of any issues relating to the Horizon system that could cause balancing

discrepancies. During my initial training and at various meetings I was always informed that the Horizon system was reliable. I do recall some times when SPMs would cite Horizon as the issue but cannot recall the offices or the issues. I do not recall any of these being prosecuted with me as the Investigating officer. I would have relied on IT personnel or Fujitsu to confirm or deny any of these matters if they did arise.

35. I cannot recall for definite if an ARQ data was requested every time a SPM was attributing a shortfall to problems with Horizon. Horizon transactions could be viewed on Credence. If a case was going to progress for prosecution an ARQ was requested. There was only a certain number allowed to be requested each month from Fujitsu and you might have to wait until the following month.

36. I do not recall if the ARQ data was provided to the SPM as a matter of course. This would be a decision made by the PPS.

37. I do not recall [FUJ00124306] but if I required information or a witness statement the Casework Manager had to authorize this. I recognise Andy Dunks and Penny Thomas as contacts in Fujitsu and there was also an expert witness from Fujitsu who provided a detailed witness statement when prosecution cases were progressing through the court in Northern Ireland. I do not recall their name.

Relationship with others

38. A few years before I left the Post Office the system for progressing Suspect Offender files changed and I presented my Evidential files/Prosecution Files to Ernie Waterworth, Solicitor in McCartan, Turkington and Breen instead of the PSNI. I cannot recall the reason why but may have been due to a re-organisation within the PSNI. I also do not remember if the cases were based on Horizon data showing apparent shortfalls.

Prosecution in Devolved Nations

39. When I joined the Post Office Security Team there was no internal prosecution process in place as Northern Ireland has its own courts and system. As I had worked in Royal Mail Security previously and cases were handed to the police, a similar process was put in place for Post Office Investigations. I worked with Post Office Security Team, Post Office Legal Team, PSNI, and the Public Prosecution office to develop and agree a Memorandum of Understanding on how to progress Suspect Offender files through the courts.

40. I did not have any experience of the Northern Ireland legal system when I became involved in this work.

41. I have been asked to describe the process by which cases were investigated and prosecuted in Northern Ireland. In particular, to describe how the process in Northern Ireland differed from England and Wales and any ways in which the process in Northern Ireland changed during the time I was involved. Investigation Cases were conducted in the same ways as the rest of the

United Kingdom except as mentioned in paragraph 37. The Head of Security made the decision for progressing an Evidential Report to the PSNI. Meetings would take place with the PSNI to discuss the case and if further evidence or statements were needed. A Prosecution file was processed and handed to Public Prosecution Office. I, and sometimes my line manager or another investigation manager, met with the Public Prosecution Office to discuss any queries. I do not recall if any of these cases were based on Horizon data showing shortfalls.

42. I have been asked to explain what instructions were complied with in preparing a prosecution file to support criminal proceedings in Northern Ireland. Several meetings took place during the course of a prosecution with Police and Public Prosecution Service. The instructions regarding preparing a Suspect Offender File were complied with in the same way as in England and Wales. At this stage the Memorandum of Understanding agreed by the PSNI and PPS was followed. An Evidential Report would initially be sent to the police for consideration. The Police would examine the report and advise on the case if any additional material was required. Once the Police agreed sufficient evidence had been provided a Prosecution file was prepared and handed to the PPS. I would have meetings with officers and the Director of Public Prosecutions and the legal team assigned to the case.

43. I have been asked to provide details of the individuals I worked with on cases in Northern Ireland. Northern Ireland Post Office Investigation Team: Keith Gilchrist and Simon Hutchinson. Northern Ireland Physical Security Manager:

Roy Wallace. Line Managers: Les Thorpe, Jude Trotter, Paul Dawkins, Dave Pardoe, Ged Harbinson, Diane Matthews and Helen Dickinson. The Casework Team: Graham Ward, Dave Posnett, Helen Rose. Royal Mail Security Team: William Boyd and Paul McCloskey. Post Office Investigators: Steve Bradshaw, Paul Whittaker, Chris Knight and Jon Longman, The Audit Team: Linda McLaughlin, Peter Todd, Terry Smithson, Ina Crawford, Sean McCaughey, Rosemary Curran and John McKenny. Contracts Managers: Denise Reid, Kenny Sharp and Brian Trotter. Retail Managers: Carol Heaps, Aiden McNeill, Gary Groogan, and Vivienne O'Hare. Cash Centre: Stephen McAlveen Cash Centre Manager PSNI: George Clydesdale and other officers. Public Prosecution Service: Stephen Herron (DPP) and other solicitors. Barrister: Charlie McKay QC and other barristers.

44. The major difficulty I encountered was when I joined Post Office Security there was no prosecution process in place as Northern Ireland has its own systems.

Involvement in criminal prosecution case studies being examined by the Inquiry

Prosecution of Alan McLaughlin

45. I do not have any direct recollection of this case and therefore I can only rely on what is contained in the documents provided to me with the Request.

46. In providing my account I have considered the following documents:

- i) The audit report p176 to p188 [AMCL0000031];

- ii) The interview transcript (dated 26 July 2001) (commencing at 13:04) pages 94 to 125 [AMCL0000014];
- iii) The interview transcript (undated but presumably dated 26 July 2001) (commencing at 13:51) p126 to 143 [AMCL0000014];
- iv) The interview transcript (undated but presumably dated 26 July 2001) (commencing at 14:37) p144 to 171 [AMCL0000014];
- v) The interview transcript dated 26 July 2001 (commencing at 15:21) p172 to 199 [AMCL0000014];
- vi) The interview transcript dated 26 July 2001 (commencing at 16:07) p200 to 207 [AMCL0000014];
- vii) The incident log [POL00113386];
- viii) The email from Graham Ward to Suzanne Winter, dated 22 September 2004 p156 [AMCL0000031];
- ix) The statement of complaint p257 to 260 [AMCL0000031];
- x) The letter from John J Rice & Co Solicitors dated 19 April 2004 enclosing the defence statement [AMCL0000035];
- xi) The indictment dated 26 April 2004 [AMCL0000034];
- xii) The list of witness statements (which appear to have been filed at the same time as the statement of complaint) p262 to 293 and p312 to 326 [AMCL0000031];
- xiii) The list of exhibits p.367 to 373 [AMCL0000031];
- xiv) The letter from Richard Gardiner of McClure Watters, Chartered Accountants, to John J Rice & Co Solicitors enclosing his draft report (dated 22 December 2004) p33 to 65 [AMCL0000031];
- xv) The case result form [AMCL0000033];

- xvi) The certificate of conviction dated 4 November 2021
[AMCL0000036];
- xvii) The Court of Appeal judgment in R v McLaughlin [AMCL0000037];
- xviii) Mr McLaughlin's prepared for the application to the Court of Appeal
in Northern Ireland [AMCL0000040].

47. My recollection of the case was when Casework advised me of overclaims identified in the pouches of paid foils received in the Paid Order Unit Lisahally from Brookfield Post Office. The overclaims resulted from values being claimed in add listings for which no pension or allowance foil existed. This was a paper based system relying on production of "vouchers" to align with the sums paid out.

48. My role was to investigate all lines of enquiry and gather evidence to identify if a crime or suspected crime had been committed.

49. Once aware of these discrepancies I received authority to arrange with the Paid Order Unit (POU) Lisahally to set aside the pouches dispatched from Brookfield Post Office and I would collect. I examined these pouches and recorded all discrepancies on a schedule. After a number of weeks as the overclaims were continuing and counter balances were not indicating overages I arranged a special audit of the accounts.

50. A number of weeks' worth of pouches and balances were checked and other enquiries conducted. From my recall these would include the history of the

office, Human Resources Print Out, Training of Sub Postmaster, Audit concerns, Cash Management Records and a preliminary report would have been sent to my Team Leader and Casework Manager. They would review the case and authorise me to arrange to have a Special Audit conducted. During the interview with Mr McLaughlin he mentioned having difficulty in processing certain documents which I understood were the inputting errors. He also stated he had had counter losses and staff dishonesty but as I had always been assured there wasn't any problem with the Horizon system with regard to cash discrepancies I did not consider the counter losses to be attributed to the Horizon system. I do not recall Mr McLaughlin suggesting any direct issue with Horizon that would cause cash discrepancies or suggesting there was some error which could be attributed to Horizon.

51. I interviewed Mr McLaughlin, under caution with the assistance of Les Thorpe, my line manager.

52. The Public Prosecution Service made the charging decision in this case. I do not recall any specific discussion with them on the decision or leading to the decision.

53. The Director of Public Prosecutions authorised the prosecution of Mr McLaughlin.

54. From recall and viewing the Audit Report dated 3rd September 2004 [**refer to AMCL0000031**] Page 192 Mr McLaughlin had not raised any concerns

regarding the Horizon system creating losses when audited in May 2001. During interview on 26th July 2001 he did raise concerns regarding losses and staff dishonesty but not Horizon. I do not believe Horizon data was available at this time to view or that he was raising Horizon as an explanation for the losses.

55. I was the Disclosure Officer in this case but all disclosure decisions were made by the PPS and my job was to maintain the record of documents and disclosure in the Post Office.

56. My understanding of this role was to disclose any relevant material involved during the investigation regardless of if it undermines the prosecution case. Again this was overseen by the PPS and the PSNI.

57. Cases in Northern Ireland would have been discussed with the Public Prosecution Service, their solicitors and barristers. I do recall speaking with Juliet McFarlane at certain times and other solicitors in Post Office Legal Services but it may not have been about this particular case.

58. My reflections of this case are that I had no reason to believe the Horizon system was unreliable and caused balancing discrepancies as Fujitsu had always stated it was completely reliable. I had no concerns with regard to its integrity. The main issue was in overclaims for cash against paper vouchers for Pension payments and so the Horizon element was not a main concern from memory. In light of the information now available I think I would have

asked for further checks but cannot speculate as to whether there would be any different view on the prosecution decision within PPS as the evidence related to the claims for cash against the vouchers provided and no overages being generated in any audits and reviews.

Prosecution of Maureen McKelvey

59. I do not have any direct recollection of this case and therefore I can only rely on what is contained in the documents provided to me with the Request.

60. In providing my account I have considered the documents below.

- i) The call logs pp.19 - 24 [PNI00000001_071];
- ii) The intervention logs p.6 & pp.15-18 [PNI00000001_071];
- iii) The audit report, sent to Ms McKelvey, dated 29 August 2001 pp.8-11 [PNI00000001_071];
- iv) The letter from Denise Reid, contract manager, to Ms McKelvey dated 1 November pp.12-13 and response from Ms McKelvey p.14 [PNI00000001_071];
- v) The record of interview dated 4 April 2002, starting at 11:35 pp.50-66 [PNI00000001_062];
- vi) The record of interview dated 4 April 2002, starting at 12:22 pp.67-78 [PNI00000001_062];
- vii) The record of interview dated 27 May 2005, starting at 14:45 pp.79-104 [PNI00000001_062];

- viii) The report of Suzanne Winter pp.3-12 [PNI00000001_082];
- ix) The letter from DS McAuley to the Legal Registrar confirming there is sufficient evidence to proceed with the prosecution dated January 2004 p.1 [PNI00000001_082];
- x) The statement of complaint p.3 [PNI00000001_062];
- xi) The letter from the DPP to the Senior Law Clerk dated 22 March 2004 p.3 [PNI00000001_039];
- xii) The directions for committal proceedings, dated 22 March 2002 pp.5-8 [PNI00000001_039];
- xiii) The letter from the DPP to the Chief Constable dated 29 March 2004 p.4 [PNI00000001_039];
- xiv) The legal rights form and right to a friend form, signed by Suzanne Winter and Ms McKelvey, dated 4 April 2002 [PNI00000001_043];
- xv) The Draft Indictment [PNI00000001_057];
- xvi) The Indictment [PNI00000001_055];
- xvii) The notice of intention to request the court to conduct a preliminary inquiry, dated 7 April 2004 P.1 [PNI00000001_062];
- xviii) The prosecution brief for the committal proceedings, dated 20 April 2004 [PNI00000001_058];
- xix) The confirmation of compliance with primary disclosure dated 20 April 2004 P.1 [PNI00000001_080];
- xx) The letter from DPP to John J McNally & Co dated May 2004 688 enclosing the letter [PNI00000001_075];

- xxi) The letter from Kevin Shiels to Detective Constable Coyle dated May 2004 regarding the disclosure of prosecution material under section 5 of the CPIA 1996 p.1 [PNI00000001_076];
- xxii) The letter from Claire Gallagher to John J McNally & Co dated May 2004 confirming receipt of the defence statement p.2 [PNI00000001_076];
- xxiii) The letter from Claire Gallagher of the PPS to Detective Constable Coyle dated May 2004 (p.1) [PNI00000001_064];
- xxiv) The letter from John J McNally & Co to the DPP dated 10 May 2004 693 and the enclosed defence statement pp.3-6 [PNI00000001_076];
- xxv) The letter from the NI Court Service listing the case for arraignment dated 11 May 2004 p.4 [PNI00000001_064];
- xxvi) The letter from Claire Gallagher of the PPS to Detective Constable Coyle dated 12 May 2004 [PNI00000001_063];
- xxvii) The letter from DC Coyle to the DI of Omagh Police Station dated 21 May 2004 pp.2-3 [PNI00000001_078];
- xxviii) The letter from the DPP to JJ McNally & Co, dated 15 June 2004 [PNI00000001_037]; - 16 -
- xxix) The letter from Kevin Shiels to John J McNally & Co dated 15 June 2004 regarding disclosure under section 7 CPIA 1996 p.1 [PNI00000001_078];
- xxix) The note of the discussion between Suzanne Winter and Rosemary Curran of POL regarding the accounting system on 23 June 2004 pp.7-12 [PNI00000001_072];

- xxx) The letter from John J McNally & Co to Detective Constable Coyle dated 22 July 2004 seeking secondary disclosure **[PNI00000001_073]**;
- xxxi) The letter from Goldblatt McGuigan, chartered accountants, to Suzanne Winter dated 23 July 2004 pp.4-6 **[PNI00000001_072]**;
- xxxii) The letter from Brian Curran of the DPP to John J McNally & Co dated 27 July 2004 **[PNI00000001_079]**;
- xxxiii) The letter from Suzanne Winter to Colin Coyle of PSNI dated 30 July 2004 **[PNI00000001_069]**;
- xxxiv) The letter from Detective Constable Coyle to the Criminal Justice Unit dated 2 August enclosing a letter from J McNally & Co pp.2-4 **[PNI00000001_071]**;
- xxxv) The letter from Omagh Crown Court Office listing the case for trial, dated 6 August 2004 p.1 **[PNI00000001_072]**;
- xxxvi) The letter from Inspector J McCleery to the PPS regarding disclosure dated 16 August 2004 p.1 **[PNI00000001_071]**;
- xxxvii) The letter from Claire Gallagher of the PPS to Detective Constable Coyle dated 23 August 2004 **[PNI00000001_067]**;
- xxxviii) The letter from Claire Gallagher of the PPS to prosecution counsel, Mr McKay, dated 23 August 2004 **[PNI00000001_068]**;
- xxxix) The letter from Paul Dale on behalf of the DPP to John J McNally & Co dated 23 August 2004 **[PNI00000001_070]**;
- xl) The letter from Dr M Cavert to John McNally & Co dated 6 September 2004 pp.4-5 **[PNI00000001_038]**;

- xli) The letter from John J McNally & Co to the DPP dated 7 September 2004 in relation to Ms McKelvey's health p.3 [PNI00000001_038];
- xlii) The letter from John J McNally & Co to the DPP dated 7 September 2004 enclosing the medical report [PNI00000001_065];
- xliii) The note from the PPS to Kevin Shiels dated 8 September 2004 (pp.2-5 [PNI00000001_038];
- xliv) The note dated 10 September 2004 p.1 [PNI00000001_038];
- xlv) The letter from Charles McKay to the Assistant DPP, dated 6 November 2004 pp.4-5. [PNI00000001_036];
- xlvi) The note of the trial [PNI00000001_052] & [PNI00000001_053]

61. The casework team in the POU in Lisahally raised concerns with regard to overclaims in the paid Benefit foils received in their office from Clanabogan Post Office. The overclaims had been identified when conducting a routine check. These checks were performed against all offices during the year on a spot check but reasonably routine basis and if any issue was flagged it would trigger further investigations. The overclaims were identified by claiming for foils that were not present in the bundle. For a number of weeks I arranged with the Manager of the POU to redirect Clanabogans Pouches to me for further checks to be carried out. These checks identified further overclaims of foils being claimed but not present. I would have conducted further enquiries to gather as much information about the office, who worked in the office. How long the SPM had been in office, any concerns raised either by the SPM or to the SPM from Gary Groogan, Retail Manager, Denise Reid, Contracts Manager or the Audit Team. Credence information would be checked on

Horizon with regard to the overclaims and call logs for any queries raised. The claimed missing foils should have created an overage but cash declarations and balance were not indicating this.

62. To establish what was happening in the office a Special Audit was requested and authorised from Casework. In April 2002 I attended Clanabogan Post Office and was accompanied by Les Thorpe, my Team Leader and John McKenny, Auditor. On arrival at the office I would have identified the SPM, introduced the team and explained that we would be closing the office to conduct a Special Audit due to concerns arising. Legal Rights and Post Office Friend arrangements were explained and they were asked to give their attention to the audit as it took place. Les Thorpe and I observed the audit and at the completion the audit result was, from the documents disclosed, a shortage of £152.80. I can't recall but I believe Mrs. McKelvey arranged with Stephen Atherton to conduct the investigation interview at his office in Omagh.

63. During the interview Maureen McKelvey stated she checked that she entered the foils on the Horizon system when paying the cash out and then at the end of the evening she checked them against a computer print out and had not identified any errors. The system operated with regard to the Camphill account was that Maureen McKelvey took the foils from the books and paid the total due with one cheque. Mrs McKelvey stated the process for receiving her cash remittance from Belfast had changed and she was unable to request a special delivery of cash to help cover the office. This meant on occasion she quite often had no money to pay out to customers and she had to use shop

money until her cash remittance was received. Maureen McKelvey was advised further pouches required to be examined and she and her solicitor were invited to attend examination of these pouches. In May 2002 further pouches were examined in the Crown Office in Omagh. Roy Wallace, Post Office Security assisted and Stephen Atherton and Maureen McKelvey observed. Further discrepancies were identified.

64. I formally interviewed Maureen McKelvey in May 2002 and no explanation was offered as to the discrepancies in the paid pension and allowances. A Suspect Offender file was prepared and forwarded to the Casework Team. The Head of Security directed production of an Evidential file for the Police. I handed the Evidential file to Police and received guidance from them on completing statements and if any further evidence was required. I cannot recall any specific directions but this was the standard approach to the file productions. I produced a Prosecution file and handed the file to officers in the PPS. Further discussions would have taken place between myself and PPS. The PPS made the decision to progress the case to court and Mr Charlie McKay BI was appointed to the case. I would have several meetings with him and PPS solicitors before the case was presented in court. I believe there was someone I needed to get a statement from on the day of the court case but cannot remember who it was.

65. I have considered the following documents

- i) The index of witnesses (pp.9-15) [PNI00000001_039]
- ii) The witness statement of Una Kelly dated 26 September 2002 pp.6-7. [PNI00000001_062]

- iii) The witness statement of Michael Scarlett dated 26 September 2002 pp.8-9. [PNI00000001_062]
- iv) The witness statement of Bernadette Mellon dated 27 September pp.10-11. [PNI00000001_062] v) The witness statement of Glenn McDonald dated 7 October 2002 pp.12 -13. [PNI00000001_062]
- v) The witness statement of Susan Hanna dated 26 September 2002 pp.14-15. [PNI00000001_062]
- vi) The witness statement of John McKenny dated 25 September 2002 p.16 [PNI00000001_062]
- vii) The witness statement of Kenneth Sharp dated 7 November 2002 p.17-18 [PNI00000001_062]
- viii) The witness statement of Robert George Wallace dated 28 October 2002 pp.19 -20. [PNI00000001_062]
- ix) The witness statement of Frederick Leslie Thorpe dated 25 October 2002 pp.21-22. [PNI00000001_062]
- x) The witness statement of Suzanne Winter dated 14 October 2002 pp.23-25. [PNI00000001_062]
- xi) The witness statement of Suzanne Winter dated 15 October 2002 pp.26-28. [PNI00000001_062]
- xii) The witness statement of Suzanne Winter dated 17 October 2002 pp.29-30. [PNI00000001_062]
- xiii) The witness statement of Tony Kennedy dated 23 July 2003 pp.31-36. [PNI00000001_062]

- xiv) The witness statement of Una Kelly dated 6 January 2004 p37.
[PNI00000001_062]
- xvi) The witness statement of Michael Scarlett dated 8 January 2004 pp.38-39. [PNI00000001_062]
- xvii) The witness statement of Sonia Cassidy dated 5 January 2004 pp.40-42. [PNI00000001_062]
- xviii) The witness statement of Tony Kennedy, dated 23 July 2003 pp2-7.
[PNI00000001_045]
- xix) The witness statement of Michael Scarlett dated 8 January 2004 pp.2-3. [PNI00000001_050]
- xx) The witness statement of Una Kelly dated 6 January 2004 p4.
[PNI00000001_050]
- xxi) The witness statement of Sonia Cassidy dated 5 January 2004 pp.5-7. [PNI00000001_050]
- xxii) The list of exhibits pp.43-48 [PNI00000001_062]
- xxiii) The Schedule of Unused Material p.2 [PNI00000001_037]
- xxiv) The Schedule of Non-sensitive Material [PNI00000001_040]
- xxv) The Schedule of Sensitive Material p.8 [PNI00000001_044]

66. I cannot recall if any Horizon data (and in particular ARQ logs) were requested from Fujitsu in this case. I do recall receiving a witness statement from Fujitsu at some point but this may have been for another case.

67. As in the earlier named case I was the Disclosure Officer in the case.

68. As disclosure officer when I gave the Evidential File to Police they gave guidance and advice as how to present the Prosecution File.

69. I met regularly with the PPS, PSNI and spoke with Post Office legal team during my time as an investigator and my role as a witness was, probably, discussed when relevant. I do not recall any specific discussion about my role in regard to any specific case. My own belief was that my role as a witness was to explain what I had done in a case and what I had discovered.

70. I have been asked on my reflections now on the way the investigation and prosecution of this case was conducted by the Post Office and the outcome of the case. Again I think this case relied heavily on the paper vouchers/Foils and cash requests and deliveries rather than Horizon discrepancies. This is based on my recollection and review of the various documents. In hindsight and with what information we now have I believe different additional investigations could have assisted in addressing the cash issue. However considering the information we had at the time and the assistance and decision making of the PPS I do not think there was any major concern with the investigation.

General

71. I have been asked to what extent (if any) did I consider a challenge to the integrity of Horizon in one case to be relevant to other ongoing or future cases? In light of what we know now and also knowing more about how computers are not infallible I think there would be more merit in understanding how one error discovered may impact on other alleged errors. However I am not sure that an error in one process could impact on a totally different

process. The two cases in this statement relied on the old process where someone brought their pension, child benefit or other benefits book into the Post Office, the counterfoil was stamped and the voucher ripped out. The SPM then enters the transaction into the Horizon system and it calculates what cash was due and SPM paid this to the person. If they were constantly overpaying against the counterfoils (which could be checked with the vouchers) then there was an error which needed to be explained. I understand now that if Horizon recorded a different transaction to the one the SPM entered then this could cause an error but if there was a consistent pattern and none of the patterns showed that there was an under payment and so the cash showed an excess then it causes a concern. The concern and error did not prove illegal activity but the SPM would need to provide an explanation.

72. I have been asked whether there are any other matters that I consider are of relevance to Phase 4 of the Inquiry (Action against Sub-postmasters and others: policy making, audits and investigations, civil and criminal proceedings, knowledge of and responsibility for failures in investigation and disclosure) that I would like to draw to the attention of the Chair.

73. I think there are some issues with the way the Post Office operated as a whole which are relevant. In NI the team was small and there was a collegiate and collaborative approach. When I acted as second Investigator in England & Wales offices I felt there was a much more hierarchical approach. People very much stayed in their role and did not seek to expand outside it. In NI I

would have been able to speak to people of all levels in different teams and would have felt free to disagree and debate matters. I feel this was very much less apparent in the England and Wales offices. I do think that the different legal and legislative approaches in the jurisdictions was a significant factor. I always felt secure as there was a review process beyond me to check what I was providing and to seek additional material if needed.

74. I do feel very sorry for anyone who has been wrongfully accused and convicted. I cannot try to understand their pain and upset. I also wanted to say that this revelation, the Inquiry and the news which has followed has also been upsetting to me. As stated above I was very proud of being able to come and work for Royal Mail and the Post Office as we had very close family links as both my parents worked in these businesses. I was always proud of my connection and I was proud of the people I worked with. They were all very dedicated and hard working people and had a pride in their work. The revelations which suggest those higher up in the business knew about problems but didn't share these with the people on the ground has created a situation where I am no longer able to share with people I meet what I used to do. The hard work has been tainted. I hope this Inquiry can uncover the issues and can identify what went wrong, where it went wrong, who knew about it and why changes were not made sooner.

Statement of Truth

I believe the content of this statement to be true.

GRO

Signed:

Dated: 2nd January 2024

Index to First Witness Statement of Suzanne Winter

No.	Description	URN	Control Number
1.	Final Draft of the Post Office Conduct of Criminal Investigation Policy	POL00030902	POL-0027384
2.	Investigation Policy: Casework Management (England & Wales) v1.0	POL00104747	POL-0080387
3.	Investigation Policy: Casework Management (England & Wales) v4.0	POL00104777	POL-0080417
4.	Investigation Policy: Rules & Standards v2.0	POL00104754	POL-0080394
5.	Investigation Policy - Investigation Procedures v2 January 2001	POL00030687	POL-0027169
6.	"Investigation Policy: Disclosure of Unused Material, Criminal Procedures and Investigations Act 1996 Codes of Practice" v0.1	POL00104762	POL-0080402
7.	Security Managers' Guide to the Prosecution Support Office	POL00121455	POL-0127718
8.	Investigation Policy: Arrest procedures v2.0	POL00104760	POL-0080400
9.	Investigation Policy: Notes of Interview - Northern Ireland	POL00039952	POL-0036434
10.	Searching - Royal Mail Group Security Procedures & Standards in relation to conducting searches	POL00094163	POL-0094286
11.	Codes of Practice 2007 (Police and Criminal Evidence) Northern Ireland Office - Order 1989 Article 60, 60A and 65	POL00121591	POL-0127853
12.	S02 Royal Mail Group Criminal Investigation and Prosecution Policy December 2007	POL00030578	POL-0027060
13.	"Royal Mail Group Ltd Criminal Investigation and Prosecution Policy"	POL00104812	POL-0080444
14.	Royal Mail Group Security – Procedures and Standards: Standards of behaviour and complaints procedure No.10-X v2	POL00104806	POL-0080438
15.	Royal Mail Group-An Inspection of the Royal Mail Group Crime Investigations Function: July 2008. Inspection Report	POL00121607	POL-0127869
16.	Royal Mail Group Crime and Investigation Policy v1.1 October 2009	POL00031003	POL-0027485
17.	Post Office Ltd - Security Policy: Fraud Investigation and Prosecution Policy v2	POL00030580	POL-0027062
18.	Post Office Ltd Financial Investigation Policy, May 2010	POL00030579	POL-0027061
19.	RMG Procedures & Standards -	POL00026573	POL-0023214

	Proceeds of Crime Act 2002 & Financial Investigations doc 9.1 V1		
20.	Royal Mail Group Security Procedures & Standards: Initiating Investigations doc 2.1	POL00104857	POL-0080489
21.	RMG Ltd Criminal Investigation and Prosecution Policy v1.1 November 2010	POL00031008	POL-0027490
22.	Post Office's Financial Investigation Policy	POL00104853	POL-0080485
23.	Post Office Ltd. Anti-Fraud Policy	POL00104855	POL-0080487
24.	Royal Mail Group Policy - Crime and Investigation (S2) v3 effective from April 2011, owner Tony March, Group Security Director	POL00030786	POL-0027268
25.	"Royal Mail Internal Information Criminal Investigation Team: Casefile Construction England, Wales and Northern Ireland" v1	POL00104877	POL-0080509
26.	Appendix 1 to 8.2 Suspect Offender Reports, Preamble Guide England, Wales and Northern Ireland v1	POL00104879	POL-0080511
27.	"Royal Mail Internal Information Criminal Investigation Team: Guide to the preparation of suspect offender reports, England, Wales and Northern Ireland" v1	POL00104881	POL-0080513
28.	Royal Mail Internal Information: 8.11 Casework Management and PSO Products and Services v1	POL00104888	POL-0080520
29.	Post Office Prosecution Policy V1	POL00031034	POL-0027516
30.	Post Office Ltd PNC Security Operating Procedures	POL00105229	POL-0080854
31.	"Post Office Limited: Internal Protocol for Criminal Investigation and Enforcement (with flowchart)"	POL00104929	POL-0080561
32.	Undated Appendix 1 - POL Criminal Investigations and Enforcement Procedure (flowchart)	POL00105226	POL-0080851
33.	POL - Enforcement and Prosecution Policy (with comments)	POL00104968	POL-0080600
34.	POL: Criminal Enforcement and Prosecution Policy	POL00030602	POL-0027084
35.	Conduct of Criminal Investigation Policy for the Post Office. (Version 0.2)	POL00031005	POL-0027487
36.	Post Office Prosecution Policy England and Wales (effective from 1/11/13, review 1/11/14)	POL00030686	POL-0027168
37.	Conduct of Criminal Investigations	POL00027863	POL-0024504

	Policy v0.3		
38.	Condensed Guide for Audit Attendance v2	POL00104821	POL-0080453
39.	Audit Process Manual - Chapter 3 - Performing a Branch Audit - v1.2.0	POL00085977	POL-0083035
40.	Email from Ruth Robinson To: po_security_community Re: Corporate Security Newsbrief Issue 22	POL00121467	POL-0127730
41.	Email chain from Ruth Robinson To: Po_security_community Re: Corporate Security Newsbrief Issue 28	POL00121485	POL-0127748
42.	Email from Dave Posnett to Helen Dickinson, Andrew Daley, Keith Gilchrist and others. Re:Cartwright Training Day in Birmingham change of start time	POL00129311	POL-0135205
43.	Email - Investigation Circular 4 - 2011: Police Bail under the Police and Criminal Evidence Act 1984, Mandatory Reading for all Royal Mail Group Security (Investigations)	POL00158977	POL-0147056
44.	Royal Mail Security Investigation Circular 4-2011: Police Bail under the Police and Criminal Evidence Act 1984	POL00158978	POL-0147057
45.	Email from Andrew Wise to Michael Stanway forwarding an email re Casework Compliance	POL00118096	VIS00012685
46.	Appendix 1 - Case Compliance checklist	POL00118108	VIS00012697
47.	Appendix 2 - File construction and Appendixes A, B and C: "Compliance Guide: Preparation and Layout of Investigation Red Label Case Files"	POL00118109	VIS00012698
48.	Appendix 3 - Offender reports and Discipline reports: "Compliance Guide to the Preparation and Layout of Investigation Red Label Case Files"	POL00118101	VIS00012690
49.	Appendix 4 - Offender reports layout: "POL template Offender Report (Legal Investigation)"	POL00118102	VIS00012691
50.	Appendix 5 - Discipline reports layout: "POL template Offender Report (Personnel Investigation)"	POL00118103	VIS00012692
51.	Appendix 6 - Identification codes	POL00118104	VIS00012693
52.	Appendix 7 - Tape Interviews. "POL Security Operations Team guide: Summarising of Tape Recorded Interviews."	POL00118105	VIS00012694
53.	Appendix 8 - Notebooks: Guidance on	POL00118106	VIS00012695

	using notebooks in investigations.		
54.	Appendix 9 - Case Progression Toolkit.	POL00118107	VIS00012696
55.	Emails between Suzanne Winter and Andy Dunks, Maureen Moor RE FW: ARQ/1213/184-195 HELPDESK Calls.	FUJ00124306	POINQ0130520F
56.	Criminal Appeal (Northern Ireland). Criminal Procedure Form 2 - Notice of Appeal/ Application for Leave of Court re: Alan McLaughlin/ Brookfield Post Office (636 pg.)	AMCL0000031	AMCL0000031
57.	pension and allowance - Tape recorded interviews - Financial Logs	AMCL0000014	AMCL0000014
58.	Incident Log -- Brookfield PO branch FAD 181704	POL00113386	POL-0110794
59.	MCLAUGHLIN - Ltr from Defence Sols with Defence Statement attached to The Crown Court	AMCL0000035	AMCL0000035
60.	MCLAUGHLIN - Charge & Indictment - Crown Court Belfast	AMCL0000034	AMCL0000034
61.	MCLAUGHLIN - Fine and Compensation Order - Crown Court	AMCL0000033	AMCL0000033
62.	MCLAUGHLIN - Certificate of Conviction - Crown Court Northern Ireland	AMCL0000036	AMCL0000036
63.	R v Alan William McLAUGHLIN (judgment of Court of Appeal Northern Ireland)	AMCL0000037	AMCL0000037
64.	MCLAUGHLIN - unsigned and undated statement prepared for NI Court of Appeal application	AMCL0000040	AMCL0000040
65.	Letter from J McCleery to PPS Belfast chambers regarding further documentation disclosure on R V Maureen McKelvey	PN100000001_071	VIS00013112_071
66.	Notice of Intention to Request Court to Conduct a Preliminary Inquiry. Plus associated court papers: statement of complaint, list of witnesses, exhibits, ROTI	PN100000001_062	VIS00013112_062
67.	Letter from PSNI re R V - Maureen McKelvey re alleged theft	PN100000001_082	VIS00013112_082
68.	Bundle of docs: Registry 258267, Indictable Directions, Department of the Director of Public Prosecutions R v Maureen McKelvey	PN100000001_039	VIS00013112_039
69.	Consigna Form explaining Legal Rights to Maureen McKelvey ahead of interview with the prosecutor	PN100000001_043	VIS00013112_043
70.	Draft Indictment. RE: Maureen	PN100000001_057	VIS00013112_057

	McKelvey		
71.	Charges, statement of offence and particulars of offence RE: Maureen McKelvey. Annotated on arraignment on 17.05.04	PNI00000001_055	VIS00013112_055
72.	Brief for Committal Proceedings. RE: Maureen McKelvey	PNI00000001_058	VIS00013112_058
73.	Particulars of service and Schedule of non sensitive Material R v Maureen McKelvey	PNI00000001_080	VIS00013112_080
74.	Letter from John J McNally & Co requesting interview tapes	PNI00000001_075	VIS00013112_075
75.	Letters, incl from K Shiels to PSNI enclosing copy of Defence Statement, R - V - Maureen McKelvey defence statement	PNI00000001_076	VIS00013112_076
76.	Letters RE: Personal Service on each Crown Witness in the Omagh Crown Court - Sitting at Dungannon - 13th September 2004.	PNI00000001_064	VIS00013112_064
77.	Letter from C Gallagher to D/Con C Coyle. RE: R V Maureen McKelvey. Omagh Crown Court (Sitting at Dungannon)	PNI00000001_063	VIS00013112_063
78.	Bundle of evidence for R. Maureen McKelvey	PNI00000001_078	VIS00013112_078
79.	Letter re: R v Maureen McKelvey, Department of the Director of Public Prosecutions, Schedule of unused material (Post Office) (Issued stamp 14.10.04)	PNI00000001_037	VIS00013112_037
80.	Letter Re Case listing for the 13th of September 2004 - corrs to Prosecution Counsel from D of Public Prosecutions R - v - Maureen	PNI00000001_072	VIS00013112_072
81.	Letter from John J McNally & Co to PSNI requesting secondary Disclosure	PNI00000001_073	VIS00013112_073
82.	Letter from Brian Curran, Western Circuit for Director of Public Prosecutions to John J. Mc Nally & Co Solicitors. Re: R v Maureen McKelvey	PNI00000001_079	VIS00013112_079
83.	Letter regarding disclosure statement from S Winter to C Coyle re Maureen McKelvey	PNI00000001_069	VIS00013112_069
84.	Letter from G Gallagher on behalf of DD of Public Prosecutions Re; Expert report in R V Maureen McKelvey	PNI00000001_067	VIS00013112_067

85.	Letter from Claire Gallagher to Charles McKay - Bar Library Re: Correspondence in R V Maureen McKelvey - Disclosure	PNI00000001_068	VIS00013112_068
86.	Letter from Paul Dale for the director of Public Prosecutions to John J McNally & Co Solicitors re; R v Maureen McKelvey	PNI00000001_070	VIS00013112_070
87.	Correspondence R v Maureen McKelvey	PNI00000001_038	VIS00013112_038
88.	Letter from John J. McNally & Co to Dept of the Director of Public Prosecution. RE: Maureen McKelvey medical report	PNI00000001_065	VIS00013112_065
89.	Special fees payable to Counsel Mc Kelvey re: offence of theft	PNI00000001_036	VIS00013112_036
90.	R -v - Maureen McKelvey Handwritten attendance note of case before Judge McFarland	PNI00000001_052	VIS00013112_052
91.	R -v - Maureen McKelvey prosecution case minutes	PNI00000001_053	VIS00013112_053
92.	R v Maureen McKelvey additional statement, statement of witness Tony Kennedy (Post Office)	PNI00000001_045	VIS00013112_045
93.	R-v-Maureen McKelvey Additional Statements bundle: Michael Scarlett, Una Kelly, Sonia Cassidy	PNI00000001_050	VIS00013112_050
94.	DPP NI Office - Disclosure of Prosecution Material - R v Maureen McKelvey	PNI00000001_040	VIS00013112_040
95.	R v Maureen McKelvey Additional Statements, SOLS LTR Additional Police Papers to Kevin Shiels PSNI (reference number 258267) re: Theft at Omagh from dates unknown until 4.4.02 R v McKelvey	PNI00000001_044	VIS00013112_044