

Witness Name: Paul Southin

Statement No.: WITN08350100

Dated: 9 January 2024

POST OFFICE HORIZON IT INQUIRY

FIRST WITNESS STATEMENT OF PAUL SOUTHIN

I, Paul Southin, 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 23.8.23 (the “Request”).
2. I have received advice and assistance from a lawyer in the preparation of this statement.

My professional background

3. I am a former employee of POL and worked in a number of roles between 2000 and 2020. I have listed those roles below, to the best of my recollection. Prior to

joining POL, I served as a police officer for approximately six years from 1979, and after that I worked in a number of sales roles in the private sector.

4. I originally started working for POL in July 2000 as an Investigation Manager (subsequently renamed Security Programme Manager) within the Security Team and remained in position until late 2007. This role involved investigating possible criminal offences committed by persons working within Post Offices and, on occasion, at the cash and stock depots and within the delivery teams that supplied and collected those items from Post Offices.
5. In late 2007, I left my position as an Investigator and commenced training to become an Accredited Financial Investigator ("AFI") within the Security Team. AFIs would generally become involved after being notified that an investigation was ongoing and a financial loss to POL had been discovered. The role involved the investigation into financial records, evidence of possible assets of the individual concerned, via Court Orders granted under the Proceeds of Crime Act 2002 ("POCA") and, where appropriate, restraining the assets pending a confiscation hearing.
6. I left my role as an AFI in 2012 and transferred to the Contracts Team as a Contracts Advisor and continued in this position until November 2019. The move came about after a restructure of the Security Team which centralised teams to a fewer number of offices. London became my nearest office, and it became too much of a journey to travel between home and work, so I decided to move into a role which allowed me to work closer to home. The Contract Advisor role included interviewing applicants for Post Office branches, dealing with contractual/disciplinary issues during the operation of Post Offices and dealing

with those postmasters leaving their positions. This could include instances where the postmaster had their contract for services terminated.

7. During November 2019, I returned to the Security Team as a team leader for the South Team for a brief period, which concluded on 3.4.20 when I left the business. My main function was to support the team reporting to me and assist the Head of Security with any tasks requested by him.
8. Paragraph 2 of the Request asks me about my role as a "Security Programme Manager". This is the title that was given to Investigation Managers, which, as I describe above, was the first role I had when I joined POL.
9. Following a successful application to join the Royal Mail Group Security Team, I undertook a three week residential training course. On completion of the course, I commenced working within POL (part of the Royal Mail Group), where I received additional training from my line manager, both within an office environment and through accompanying him on investigations that he was dealing with. This shadowing took place over a number of weeks. Further shadowing was undertaken with another experienced Investigation Manager, until I commenced working on my own cases, where ongoing support continued.
10. As stated above, my role was to investigate possible criminal offences committed by persons working within POL. This included interviewing witnesses, as well as individuals suspected of committing criminal offences, which were conducted under caution and recorded.
11. At the conclusion of any investigation, a report would be submitted to POL Legal Services, via the Security Casework team, in order that decisions could be

reached regarding the progression of each case. In cases where a decision was made to prosecute an individual and a suspect had pleaded 'not guilty', I prepared documents to support the case (known as a committal bundle) which included (but was not limited to) witness statements, written copies of interviews and exhibits.

12. During my time in this role, I reported to my line manager, the Security Team Leader. To begin with, this was Trevor Lockey, then I believe it was Lester Chine and subsequently Paul Dawkins. I found my colleagues and managers to be very competent, professional and dedicated individuals.
13. Paragraph 3 of the Request also asked me about my role as a Financial Investigator.
14. Following a successful application to join the Financial Investigation Team, I attended a number of residential courses run by the National Policing Improvement Agency in relation to POCA, after having completed pre-course work and passing examinations to allow attendance on each course. During this time, and subsequent to all of the courses attended, further training, testing and tuition was provided by my line manager, Ged Harbinson.
15. The Financial Investigator role involved the investigation of an individual's financial records and any potential assets held, in order to seek recovery of POL funds and prevent the dissipation of any relevant assets. My recollection is that my colleagues within the team, including my line manager, were extremely competent, professional and always attempted to deliver the highest possible standards.

16. Paragraph 4 of the Request asks me in particular about any role I had in relation to disciplinary matters; interviewing suspects' disclosure; litigation case strategy; and liaising with other POL departments.
17. My role with regard to disclosure in criminal and civil proceedings was to provide all of the available information to the Legal Services team, in order that they were in a position to review the relevant documents and provide the same to those concerned in any proceedings.
18. My role in litigation case strategy was to provide my report and evidence to allow decisions to be made on potential proceedings, in particular for the assistance of POL Legal Services and the senior decision-making manager.
19. During my time within the Security Team, I would frequently liaise with other departments, including the Audit Team, Contracts Team, Accounting Team and Legal Services, among others.

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

20. Paragraph 5 of the Request draws my attention to a series of documents, and paragraph 6 asks me to explain the organisational structure of the Security Team, its functions and any changes which occurred during the time I worked within it.
21. At the time I joined it, the Security Team was overseen by the Head of Investigations, who had a number of senior security managers reporting to him. I cannot recall each of the positions that these senior security managers held or their specific roles.

22. Within the wider Security Team there were a number of teams, including the Investigation Team, Security Team, Casework Team, IT Security Team and Crime Risk Management Team, among others. Both the Investigation Team and the Security Team were made up of a number of geographically located teams and those teams each had a team leader.
23. The Security Team I mentioned in paragraph 22 dealt at that time with the physical aspects of Post Offices, such as safes, alarms, security screens etc. The Casework Team performed a check on how case files were structured to ensure that they complied with standards, and acted as a bridge between the investigators and POL Legal Services. I cannot remember the specifics of what the other teams dealt with.
24. The structure changed on a number of occasions during the time I worked in the Security Team. This included the formation of the Financial Investigation Team, as well as the merging of the Security Team and Investigation Team into a single unit within the security function, led by the Head of Security.
25. Paragraph 7 of the Requests asks me to explain my role in the development and/or management of any of the policies listed in paragraph 5.
26. I wish to point out that the list of documents provided at paragraph 5 of the Request mentions that my name is given on page 3 of the document at **[POL00105229]** ("Post Office Ltd PNC Security Operating Procedures"), dated August 2012. I have looked at the document carefully and cannot find any mention of my name in the document. The Request also mentions that **[POL00104968]** (the document called "POL – Enforcement & Prosecution Policy") appears to include comments from me. Again, I have looked at this

document and can see no reference to me having made any comments on this policy.

27. I do not recall having any involvement in the development or review of the documents listed at paragraph 5 of the Request, and there are a number that are dated after I had left the Security Team. However, it is possible that I may have had some input into the two documents relating to Financial Investigation Policy ([**POL00039965**] and [**POL00104853**]), as I worked within the Financial Team at that time, but I cannot be certain about that.
28. Paragraph 8 of the Request asks me what legislation, policies and/or guidance governed the conduct of investigations conducted by the Security Team and how this changed.
29. During my time within the security team, I was governed by the Police and Criminal Evidence Act 1984, Data Protection Acts and Human Rights Act 1998, as well as POCA. My work was also governed by the Royal Mail Group/POL criminal investigation policy, procedures and standards. Other POL policies and legislation were no doubt in place, but I am unable to recall them specifically. A number of the documents were likely to have been amended over the period of time to reflect any changes to the way of working, or new guidance.
30. Paragraph 9 of the Request asks me to consider the documents at [**POL00104900**] and [**POL00105191**] asks me to describe my involvement in the development of investigation policies within POL post-separation. I note that I am among the names listed as members of the "Focus Group" on page 1 of the document at [**POL00104900**]. I don't recall this document. I have a vague recollection that there was a group, but I have no recollection of what my

involvement was in the group and what actions it carried out. In [POL00105191], I note that "Paul S" is written against a couple of the actions (specifically, attending a meeting on 24.5.11 to identify inputs and outputs for investigation procedures and a review map showing as completed on 23.8.11). I have no recollection of this document or of the matters it describes. I have no recollection of what my involvement was and what actions were undertaken.

31. Paragraph 9 of the Request also asks me to consider [POL00105216], which from sight of the document is a guide to the preparation and layout of "red label" case files, offender and discipline reports. I have reviewed the document and I cannot recall having any involvement in the development of this document. I have no recollection of any impact of the separation into the way investigations were conducted, other than the policies and documents were updated and reworded to refer to POL, rather than Royal Mail Group.
32. Paragraph 10 of the Request asks me to explain the process for dealing with complaints about the conduct of an investigation by the Security team. I believe any complaints would be directed to the Head of Investigations, but I have no recollection of the exact process as I cannot recall having received any complaints.
33. Paragraph 11 of the Request also asks me to explain what supervision there was, if any, of criminal investigations carried out by Security Managers.
34. Criminal Investigations were overseen by each Investigator's line manager, the Casework Team and POL Legal Services. The line manager was able to review cases and discuss with the investigator. The Casework Team checked that the case file was compliant with the agreed process for submitting files and POL

Legal Services reviewed the evidence presented and raised any issues or matters for clarification if required.

35. Paragraph 12 of the Request also asks me to explain any differences in policy and practice in the investigation and prosecution of Crown Office employees as compared to subpostmasters and their managers and support staff. I do not recall any difference to the practice regarding the investigation and prosecution of Crown Office employees as distinct from postmasters, their managers or assistants.

Audit and investigation

36. Paragraph 13 of the Request draws my attention to the document at [POL00104821], and I am asked to explain the circumstances in which an investigator would attend a branch audit and the role they played.
37. In relation to audit and investigation, generally an investigator would attend an audit of a branch in two circumstances. The first arose if we had prior knowledge in advance that there would be an issue (for example, if previous enquiries indicated that possible offences were being carried out at the branch and the audit was being conducted as a result of those enquiries). The second was if we had no prior knowledge but an issue arose on the day of the audit (for example where the auditor had been told by the postmaster on arrival that a shortage would be found, or the auditor had discovered a shortage or other discrepancy during the audit process with no satisfactory reason to explain the shortage).

38. Paragraph 14 of the Request asks me to explain how decisions were made about whether shortfalls identified at audit would be investigated as criminal matters or as debt recovery matters.
39. Each case would initially be judged on the available evidence as to whether any criminal wrongdoing may have taken place. To the best of my recollection, consideration of the financial figures involved may have been a factor in whether the matter was investigated by the Security Team. I cannot recall what that figure was. The figure may have been subject to change during the time I worked in the team.
40. In respect of the debt recovery, an ongoing criminal investigation had to be in place, resulting in a financial loss to POL. This would be dependent on the value of the loss and the information that was provided by the investigating officer into the potential criminal offences.
41. The POL Legal Team would advise the senior manager on any potential charges if the evidence supported such charges.
42. Paragraph 14 of the Request also asks about the role of Contract Managers in making this decision. Where the branch was run by a sub-postmaster, I don't believe that the local contract manager had any input into this decision-making process at any time.
43. Paragraph 14 of the Request also asks me to describe the "triggers/criteria" for raising a fraud case if a discrepancy was found on audit. As previously stated, I believe there was a trigger point concerning the amount of any loss for raising a fraud case, but I have no recollection of what that figure was. I have no

recollection of there being any difference between raising a theft or false accounting case in terms of the trigger point.

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

44. Paragraph 15 of the Request asks me to describe the process followed by Security Team Investigators when conducting initial investigations. The initial process would be to review the details/evidence of the specific case, including speaking to any relevant witness, such as the auditor in a significant number of cases, before informing the individual concerned in the investigation of who I was, my role, the reason for my involvement and the process moving forward.

Decisions about prosecution and criminal enforcement proceedings

45. Paragraph 16 of the Request asks me to explain who was responsible for making decisions about whether to bring a prosecution. The decision was made by a senior manager within POL.

46. Paragraph 17 of the Request asks me if, when a branch was run by a sub-postmaster, the local Contract Manager had any input into the prosecution decision making process. The Contract Manager did not have any input into the prosecution decision making process.

47. Paragraph 18 of the Request asks me what test was applied by those making prosecution and charging decisions and what factors were considered at the evidential and the public interest stage. As far as I can recall, the decision was

based upon the evidence in the case and whether it was in the public interest to bring a prosecution.

48. The main factor that was considered, as far as I recall, was the evidence that enabled any decision to be reached. I have no other knowledge of what other factors were considered by the senior manager making the decision.
49. Paragraph 19 of the Request asks me to explain what legal or other advice was provided to those making prosecution and charging decisions. POL Legal Services provided the details of the relevant charges that were applicable. I have no knowledge of what other advice was provided. My role was to provide a report to POL Legal Services, who ultimately advised me of the decision that was made. I had no involvement in the making of the decision.
50. Paragraph 20 of the Request asks me to explain the circumstances in which steps were taken to restrain a suspect's assets. Where an investigation had been undertaken that revealed a loss had occurred and in which criminal action was suspected, if assets were subsequently found that belonged to the suspect, then consideration was given to applying for a restraint order in order to prevent the dissipation of those assets.
51. Paragraph 21 of the Request asks me who decided whether criminal enforcement proceedings should be pursued and the factors they considered in making this decision. The Head of Security made the decision on whether enforcement proceedings should be pursued. As far as I can recall, the seriousness of the offence, the amount of the loss involved and any abuse of the position of trust would be factors considered in making the decision.

Training, instructions and guidance to investigators within the Security team

52. Paragraph 22 of the Request asks me to explain what guidance and/or training was given to Investigators in the Security Team in relation to a range of different tasks such as interviewing, taking witness statements, conducting searches, evidence gathering, disclosure and drafting investigation reports.
53. Investigators received guidance and training through various means in relation to these matters. This started with the initial pre-read and training course attended by the investigators and continued with further workshops over the course of time. In addition, there were the POL policy documents that were required reading. A review of previous case files was also used to understand the process for the investigation and processing of cases, as well as the tuition/shadowing of the line manager and experienced colleagues.
54. Paragraph 23 of the Request draws my attention to a series of documents which related to and supported compliance checks which were carried out in 2011 and into 2012/13, and paragraph 24 asks me a number of questions about them.
55. I cannot recall specifically whether the casework management documents of 2000 and 2002 (at [POL00104747] and [POL00104777]) were provided to me, but my assumption would be that they were. I note that the 2000 document was created prior to my arrival within the Security Team.
56. I have no recollection of what my understanding of the second, third and fourth bullet points on page 2 of the 2000 version and the first, second and third bullet points on page 2 of the 2002 version was at that time, but from having seen the document again now, it seems to me that the document requires that full

disclosure of all relevant issues is to be made, including any failures irrespective of their nature, revealed in the investigation process.

57. I do not recall any specific circumstances in which investigations became subject to compliance checks, but the purpose of the checks was to ensure the standard of work was consistent and maintained to a high level. As far as I can remember, the process was that case files and actions taken by the investigator were reviewed and checked against the process that they were expected to follow. Some of this work was undertaken by the Casework Team and would have been supported by respective line managers.
58. My understanding is that the suite of compliance documents were a guide and support to assist investigators to complete their case files to the correct standards consistently.
59. I do not recall having any particular role in the development, management or amendment of these documents. I note that in his email dated 29.3.12 (at [POL00115665]) Dave Posnett refers to me and a colleague Graham (which I take to be Graham Ward) – both of us are copied into the email – and a review of the compliance areas that we had carried out. I have a very vague memory of being tasked with undertaking a review, but I couldn't now say what that involved.
60. The Request asks me in particular about what I understood by paragraph 2.15 of the document entitled "Guide to the Preparation and Layout of Investigation Red Label Case Files – Offender reports & Discipline reports" at [POL00118101] and [POL00115671], and how this related to the "Offender Report" templates at [POL00118102] and [POL00115672] and to POL's disclosure obligations. My understanding of paragraph 2.15 of the guides at [POL00118101] and

[POL00115671] is that any failures in security, supervision, procedures or product integrity that were found should be included in the report submitted by the investigator. The templates at [POL00118102] and [POL00115672] each have a sub-heading under which any such findings could be recorded.

61. My understanding of the relevance of paragraph 2.15 to the issue of disclosure is that disclosure obligations applied to any failures, including product integrity.
62. The Request asks me in particular about the document entitled "Identification Codes" (at [POL00118104]) and if I had had any involvement in drafting or reviewing it. I have no recollection of seeing this document before the Request drew my attention to it. I had no involvement in drafting this document and I have no knowledge of who did.
63. I did not review the document and if I had been aware of the content at that time, I am confident that I would have said that it was not appropriate and needed to be amended.
64. I have no knowledge as to why investigators were instructed to assign identification codes to suspected offenders. The practice was in place when I joined the Security Team.

Analysing Horizon data and requesting ARQ data from Fujitsu

65. Paragraph 25 of the Request asks me to describe what analysis was done by Security Team investigators of Horizon data when a shortfall was attributed to problems with Horizon.

66. To the best of my knowledge, I personally never had an instance in which a shortfall was attributed to problems with Horizon so I don't recall any instance in which I had to carry out or request any analysis. I am unaware of what, if any, analysis was completed by other investigators.
67. Paragraphs 26 and 27 of the Request draw my attention to a series of documents and asks me to describe the process for requesting Horizon data; I am also asked to give an account of the contractual requirements on Fujitsu as I understood them and the limits on the number of ARQ requests that could be made, and whether there were any changes between the Legacy Horizon and Horizon Online systems.
68. My role within the Security Team meant that I had very little contact with Fujitsu and little knowledge of the contractual requirements placed on them. I am aware that there was a limit on the number of ARQ requests, but not what that number was. As far as I recall, my role was limited to completing a form requesting the relevant data for an individual Post Office during an investigation. In addition, I may have had to request a witness statement in cases where the matter was proceeding to a court hearing.
69. I have no recollection of who authorised any ARQ request or who was responsible at Fujitsu for providing this data. I do recall that data from Fujitsu was provided on a disc.
70. I do not know what prosecution support Fujitsu was contractually obliged to provide to POL, but as mentioned above, I know that witness statements were provided, but I have no recollection of anyone from Fujitsu being required to give evidence in any case that I was responsible for.

71. Paragraphs 28 and 29 of the Request asks me if ARQ data was requested as a matter of course in cases where a shortfall was attributed to Horizon and, if so, if this was provided to a sub-postmaster as a matter of course. I have no recollection of being involved in any case in which a shortfall was attributed to problems with Horizon. As such, I have no knowledge of any instances in which ARQ data was obtained from Fujitsu in circumstances where a sub-postmaster attributed a shortfall to Horizon, or if this was provided to the sub-postmaster as a matter of course.
72. Paragraph 30 of the Request asks me to describe the circumstances in which I would have had contact with Fujitsu and who my contacts were. To the best of my recollection, as I explain at paragraph 68, my role was limited to requesting Horizon data and to request a witness statement on occasions when this was required. I do not recall having any contacts at Fujitsu.
73. Paragraphs 31 and 32 of the Request asks me about my understanding of the role that Gareth Jenkins had in relation to criminal prosecutions and whether I considered him to be acting as an "expert witness". I have no recollection of the role of Gareth Jenkins in relation to criminal prosecutions. I do not recall Gareth Jenkins acting as an expert witness in any case that I was involved in and had no information relating to any understanding of the governance of independent expert evidence.

Relationship with others

74. The Request asks me to describe my involvement with Cartwright King solicitors. I believe my only involvement with Cartwright King Solicitors was that I may have

attended a presentation by them at some point. Other than that, I can't recall having had any interaction with them.

75. The Request also asks me to describe my involvement with the National Federation of Subpostmasters ("NFSP"). During my time as an Investigator, there were numerous occasions on which I had interactions with NFSP. There were a number of interviews that I conducted at which the suspect offender would be accompanied by someone from NFSP in the interview. On many other occasions, there would be a telephone call with a NFSP representative to discuss the situation and this would be at the request of the suspect themselves. I cannot recall the names of individual representatives.

Prosecution of Ms Seema Misra

76. From paragraphs 33 to 54, the Request asks me to set out my recollection of the case of Seema Misra, and my attention has been drawn to some documents.
77. Paragraph 35 of the Request asks me to describe the circumstances in which I became involved in Ms Misra's case. I became involved in this case as the Financial Investigator, following a report by the investigating officer. I was not involved in any aspect of the criminal investigation. I would have become aware of the case on being sent a Financial Evaluation Sheet.
78. Paragraph 36 of the Request asks me what my understanding of the proceedings against Ms Misra was. My only recollection is that an unexplained shortage had been identified and that the investigation was continuing. I have had sight of

[POL00119354] which details the amount of the loss and other details, which otherwise I would not have been able to recall.

79. Paragraph 37 of the Request asks me if I was aware of any allegations made by Ms Misra about the reliability of the Horizon system. I do not recall of being made aware of any allegations at that time made by Ms Misra relating to the reliability of Horizon.
80. Paragraph 38 of the Request asks me to describe my involvement in the disclosure process during the prosecution proceedings. As the Financial Investigator, I was not involved in the day-to-day details of the criminal case and was generally only kept informed of significant updates, such as prosecution decisions, court dates and case outcome. I was not involved in the disclosure process.
81. Paragraph 39 of the Request refers me to the email at [POL00093686] and asks me what I understood by Jarnail Singh's comment that "It is to be hoped the case will set a marker to dissuade other Defendants from jumping on the Horizon bashing bandwagon". I have reviewed the document and can see that the email was copied to me. I have no recollection of this email and therefore I can make no comment about my understanding of it at that time.
82. Paragraph 40 of the Request draws my attention to a series of "cases on hand" reports and a series of documents containing correspondence in which I am included, and paragraph 41 asks me to describe my involvement in the financial investigation. I was the Financial Investigator dealing with this case until its conclusion.

83. Paragraph 42 of the Request asks me to describe any information I obtained in the course of the financial investigation. I am not able to recall what specific information was obtained in relation to this matter, but having looked at the section 16(3) POCA report I compiled (at page 3 onwards of the document at [POL00094027]), it seems to me that I would have gathered the information that is contained in my statement.
84. Paragraph 43 of the Request asks me who I reported my findings to. I would have reported the findings to POL Legal Services and kept the investigating officer updated with the ongoing process.
85. Paragraph 44 of the Request asks me whose decision it was to proceed to confiscation in this case and how the decision was made. As far as I can recall, it would have been the decision of the Senior Authorising Officer to proceed with a confiscation, with authorisation from my line manager. To the best of my knowledge, this decision was based on the loss involved, the potential assets that were believed available at the time and the outstanding loss to POL.
86. Paragraph 45 of the Request asks me to describe my recollection of the confiscation proceedings and my role in preparing the court documents for these proceedings. I have no particular recollection of the confiscation proceedings, my role would have included the preparation of a section 16 statement under POCA, which I refer to at paragraph 83, above.
87. Paragraph 46 of the Request asks if I attended court and, if so, in what capacity. I may have attended court in my role as the Financial Investigator, to assist the barrister representing POL with any queries, but I cannot be certain of this.

88. Paragraph 47 of the Request asks me if I was asked to provide a witness statement. I have no recollection of being asked to provide a witness statement.
89. Paragraph 48 of the Request asks me to outline the role of any other individuals involved in the enforcement proceedings. Aside from the Financial Investigation team members, the only other individuals involved that I can recall would have been POL Legal Services, including the barrister instructed by POL to represent POL in the hearing.
90. Paragraphs 49 and 50 of the Request draw my attention to a series of documents and ask for my view on the outcome of the confiscation proceedings and my view on the confiscation order following the re-possession of Ms Misra's property and the property being sold.
91. I don't recall having a view on the outcome of the confiscation proceedings; the decision to make the order was ultimately one for the court. I have no recollection of any views on the confiscation order following re-possession of the property and the property being sold. I do not recall whether any advice was provided on how to proceed when being made aware the property had been sold.
92. Paragraph 51 of the Request also draws my attention to the documents at **[POL00094048]** and **[POL00057563]** and asks me about my participation in the hearing which took place on 26.3.12 and at which the court considered whether to amend the confiscation order. I am unsure if I was present at the hearing of 26.3.12, or whether I was the Financial Investigator that considered the bundle of financial information presented by Ms Misra, but it is possible that it may have been me as it was a case I was dealing with.

93. Paragraph 52 of the Request also draws my attention to a series of documents and asks me about my participation in the hearing at which the confiscation order was varied to a £1 nominal order, and my reaction to the decision. I have no memory of being at the hearing in which the confiscation was varied by the court to a £1 nominal order. I have considered the document at **[POL00057685]** (an email from Zoe Topham dated 4.5.12) which relates to a conversation she had had with Dave Posnett. In this email, Zoe Topham says that Dave Posnett told her that I "didn't attend the hearing" (which seems to refer to the hearing at which the confiscation order was varied) as I had been off sick. It seems likely therefore that I did not attend. I have no recollection of any reaction to the outcome of this hearing by myself or any other colleague. However, this was not an unusual situation, there were a number of cases that the team dealt with which resulted in a £1 nominal order being agreed.
94. Paragraph 53 of the Request refers me to the document at **[POL00093985]** and asks me if, following the variation of the confiscation order, I or other colleagues received any advice about bringing civil proceedings against Ms Misra. I have considered the document. I am not aware of any advice given on the viability of bringing civil proceedings against Ms Misra in relation to the shortfall at West Byfleet Post Office.
95. Paragraph 42 of the Request asks me to consider the judgment of the Court of Appeal in *Josephine Hamilton & Others v Post Office Limited* at document **[POL00113278]** and asks me about my reflections on how the investigation and prosecution of Ms Misra was conducted. Having now had the opportunity to read the extracts relating to Ms Misra's case in the judgment, it would appear that the criminal investigation was not conducted in the way that it should have been. It

is apparent from reviewing the judgment that there was a failure of disclosure in this case.

Prosecution of Alison Hall

96. From paragraphs 55 to 65, the Request asks me to set out my recollection of the case of Alison Hall, and my attention has been drawn to a series of documents

97. Notwithstanding having reviewed these documents, I am unable to recall my involvement in this case, which occurred over 12 years ago. I can see from reviewing the documents that I was the Financial Investigator in the case of Alison Hall, but having read the documents, it has not triggered any further memories that enable me to provide any details in relation to the questions asked.

Prosecution of Lynette Hutchings

98. From paragraphs 66 to 73, the Request asks me to set out my recollection of the case of Lynette Hutchings, and my attention has been drawn to a series of documents.

99. Notwithstanding having reviewed these documents, I am unable to recall my involvement in this case, which occurred over 11 years ago. However, on looking at the documents provided, I can see that no financial investigation case was raised, and therefore it would appear that I had no direct involvement with this matter. No further memories have been triggered having read through the

documents listed above that enable me to provide any details in relation to the questions asked.

Prosecution of Khayyam Ishaq

100. From paragraphs 74 to 82, the Request asks me to set out my recollection of the case of Khayyam Ishaq, and my attention has been drawn to a series of documents.

101. I have looked at the documents and I note that this case relates to a financial investigation case dealt with by Dave Posnett. I was not involved directly in this case; the only involvement I can see that I had in this case, having reviewed the case file at [POL00064614], is that I forwarded case documents to Helen Dickinson, although I am unable to recall the reason for having done so. That aside, I am unable to provide any details in relation to the questions asked.

Prosecution of Julian Wilson

102. From paragraphs 83 to 92, the Request asks me to set out my recollection of the case of Julian Wilson, and my attention has been drawn to a series of documents.

103. I have looked at these documents. Notwithstanding that, I cannot recall any details of the case. I can see from those documents that this case was primarily dealt with by my colleague, Graham Ward. It is evident from the documents that I was involved on an administrative basis in a small number of emails, but not personally with the running of the financial investigation. I have no recollection that enables me to provide any details in relation to the questions asked.

Prosecution of Susan Rudkin.

104. From paragraphs 93 to 102, the Request asks me to set out my recollection of the case of Susan Rudkin, and my attention has been drawn to a series of documents.

105. I have looked at these documents. Notwithstanding that, I cannot recall any details of this case. I can see from reviewing these documents that this case was handled primarily by my colleagues Ged Harbinson and Graham Ward and my involvement was purely as a result of a telephone call into the team and an email subsequent to the case closing, by which time I had left the Security Team. I have nothing further I can add to this matter, given that it was a case that I never dealt directly with.

General

106. Paragraph 103 of the Request asks me to what extent I considered a challenge to the integrity of the Horizon system in one particular case to be relevant to other cases. As I mentioned previously, I was not aware of a challenge to the integrity of the Horizon on any cases that I dealt with during my time in the Security Team. I can't therefore offer a view as to whether I thought an issue raised in one case would be relevant to another.

107. Paragraphs 104 and 105 of the Request also ask me to what extent I considered the investigation into bugs, errors and defects in Horizon was sufficiently carried out by POL, and whether sufficient information was provided by Fujitsu. I have no knowledge of any investigation that POL carried out into bugs, errors and

defects in Horizon. I have no knowledge of what if any information regarding bugs, errors and defects in Horizon was passed to the Post Office by Fujitsu.

108. No information was given to me regarding bugs, errors and defects in Horizon.

My reflection on this now is that someone within the senior management team/executive team within POL should have provided this information and been transparent about the issues with the staff.

109. I am asked to offer any reflections I have on the matters being investigated by

the Inquiry. The only reflection I would offer is that, on any occasion that that I can recall that POL management provided information about the Horizon system (in emails or face to face meetings), they repeated that they had faith in Horizon, that they would defend their position and the system, and that it processed millions of transactions a week without any issues. Also, I recall I attended a meeting in February 2019 at which the system was described as "robust" by Julie Thomas, who was a senior manager within POL (I remember the meeting specifically because a number of teams across POL attended, and that it took place before the "Common Issues judgment" handed down in the High Court by Mr Justice Fraser). At no time during the period of my time in the Security Team can I recall any information being provided by the senior management team to suggest there was a significant problem with the Horizon IT system.

110. I have no further reflections on these matters or other matters relevant to the

Inquiry's Terms of Reference, and there are no other matters I wish to bring to the attention of the Chair of the Inquiry.

Statement of Truth

I believe the content of this statement to be true.

Signed:

GRO

Dated:

09 Jan 2024

Index to First Witness Statement of Paul Southin

No.	URN	Document Description	Control No.
1	POL00105229	"Post Office Ltd PNC Security Operating Procedures", August 2012	POL-0080854
2	POL00104968	"POL – Enforcement & Prosecution Policy"	POL-0080600
3	POL00039965	"Post Office Ltd Financial Investigation Policy", v.1 May 2010	POL-0036447
4	POL00104853	"Post Office Ltd Financial Investigation Policy", v.2 February 2011	POL-0080485
5	POL00104900	"Separation Project – Criminal Investigations Policy for Post Office Ltd", undated	POL-0080532
6	POL00105191	"Activity Plan for POL Separation Project – Criminal Investigations Policy"	POL-0080816
7	POL00105216	"Guide to the Preparation and Layout of Investigation Red Label Case Files"	POL-0080841
8	POL00104821	"Condensed Guide for Audit Attendance", v.2, October 2008	POL-0080453
9	POL00104747	Casework Management Document, version 1.0, March 2000	POL-0080387
10	POL00104777	Casework Management Document, version 4.0, October 2002	POL-0080417
11	POL00115665	Email from Dave Posnett, 29.3.12	POL-0115825
12	POL00118101	"Guide to the Preparation and Layout of Investigation Red Label Case Files"	VIS00012690
13	POL00115671	"Guide to the Preparation and Layout of Investigation Red Label Case Files"	POL-0115831
14	POL00118102	Offender Report template	VIS00012691
15	POL00115672	Offender Report template	POL-0115832
16	POL00118104	"Identity Codes"	VIS00012693
17	POL00119354	Email Ged Harbinson forwarding "Suspect Offender Reporting" form, 22.1.08	POL-0119273
18	POL00093686	Email from Jarnail Singh, 21.10.10	POL-0093808
19	POL00094027	Memo from Jarnail Singh, 22.10.10; Statement of Information Relevant in accordance with section 16(3) Proceeds of Crime Act 2002 dated 20.1.11	POL-0094149
20	POL00094048	Documents referring to hearing on 26.3.12	POL-0094170
21	POL00057563	Memo from Jarnail Singh, 19.3.12	POL-0054042
22	POL00057685	Email from Zoe Topham, 4.5.12	POL-0054164
23	POL00093985	Email correspondence, 4.5.12 to 20.6.12	POL-0094107

24	POL00113278	Judgment of the Court of Appeal in <i>Josephine Hamilton & Others v Post Office Limited</i>	POL-0110657
25	POL00064614	Email Paul Southin to Helen Dickinson forwarding "New Case Raised" form, 31.3.11	POL-0061093

