

Witness Name: Philip Gerrish

Statement No.: WITN08370100

Dated: 7/6/2023

POST OFFICE HORIZON IT INQUIRY

FIRST WITNESS STATEMENT OF PHILIP GERRISH

INTRODUCTION

I, PHILIP GERRISH will say as follows:

1. This written witness statement has been drafted in response to the Rule 9 request dated April 14th 2023 and supplementary questions sent to me on May 16th 2023 regarding involvement in action taken against Sub-Postmasters by Post Office Ltd, as part of Phase 4 of the Post Office Horizon IT Inquiry ("the Inquiry").

Relevant background

2. I originally joined the Post Office as a counter clerk in the City of London in 1980. In 1988 I joined the Post Office Investigation Department (POID) as an Assistant Investigation Officer. I was promoted to Investigation Officer in 1989. I investigated suspected or detected crime across the whole business including, predominantly, the mail, parcels and counters networks. In 1996

following the Review of Corporate Centre (ROCC) I transferred across to Post Office Counters (POCL) as an Investigation Manager in the South East Region. In circa late 1998, to the best of my recollection, I was temporarily promoted to Regional Security and Investigation Manager (RSIM) in the POCL South East Region and subsequently seconded to the Shaping for Competitive Success project (SCS) in the following year. In October 1999 I was appointed Territory Security Manager (TSM) for the Post Office Network (PON) East Territory. Again, to the best of my recollection, sometime in 2002 following an internal re-organisation, I was appointed National Internal Crime and Investigation Manager for PON. I left Post Office Limited (POL) in 2004 when I was appointed Head of Investigation for Royal Mail and Group. This role did not include any responsibilities or accountabilities involving Post Office Ltd or Parcelforce Worldwide (PFW) which both had their own Heads of Security and embedded Security and Investigation teams. I subsequently became Director of Investigations Royal Mail and Group. I retired in 2015.

3. Between 1996 and 1998 I was one of three Investigation Managers within the POCL South East Region investigating suspected or detected crime against the Post Office. I covered Kent and East Sussex. As the temporary RSIM for POCL South East in addition to the Investigation function I was also responsible for 3 CM2 IDs, 3 Security Managers and the physical and procedural security inspections and investment for all outlets (branch and sub offices) within the Region. Between 1999 and 2002, as the TSM for the East Territory, I lead the team that investigated crime against PON/POL in that area and managed physical and procedural security standards inspections and

investment across that Territory. Between 2002 and leaving POL in 2004 as National Internal Crime and Investigation Manager I led the team responsible for investigating internal crime across the whole Post Office Network including Scotland and Northern Ireland. POL did not bring prosecutions in Scotland or Northern Ireland. In Scotland cases were submitted to the Procurator Fiscal (PF) and in Northern Ireland the Public Prosecution Service Northern Ireland (PPSNI) following its inception and before that the Police. I have been asked to consider which was the most effective system. I cannot comment. I only had personal experience of the English system.

The policies/practices in place relating to criminal investigation and prosecution

4. Between 1989 and 1993 (as an Investigation Officer) and 1996 and 1998 (as an Investigation Manager) POCL I worked in defined geographical areas; formerly in East London and Essex and latterly in Kent and East Sussex, investigating suspected or detected crime committed against the Post Office. This included investigating Sub Postmasters (SPMR) and Sub Postmaster's assistants. To the best of my memory, policies and practices did not change in any significant material way during that period excepting the introduction of taped recorded interviews and the increased use of computers to manage casework processes. Policies, procedures and practices were outlined in the POID manual subsequently translated into Group Policy, Procedures and Standards and in accordance with appropriate legislation including the Police and Criminal Evidence Act (1984) Codes of Practice and the Criminal Procedure and Investigations Act (1996) when the Act came into force.

The rationale behind the practice of bringing private prosecutions

5. Historically there has been a two century long plus precedent of Post Office/Royal Mail investigating its own crime and decades of bringing private prosecutions. The POID and its subsequent iterations such as Post Office Security and Investigation Services (POIS) was a Home Office recognised law enforcement agency operating under all relevant criminal legislation. The Police had neither the resource, the knowledge nor the desire to investigate Post Office/Royal Mail internal crime. The obligation to carry out these activities in-house would have emanated from the considerations of public money, public property, public trust, the breach of that trust and deterrent. I cannot comment on POL's rationale post separation or after 2004. On occasions POL/RM may have requested Police assistance in an investigation. This may have been because there were additional external suspects linked or potential physical risk. This would not preclude POL/RM still leading the prosecution.

Policies governing the conduct of criminal investigations by the Security team and the organisational structure

6. I have been asked to explain my role in the development, authorisation, management and/or assurance of several policies (listed by reference to documents that have been provided to me by the Inquiry) relating to the conduct of criminal investigations by the Security team. I have examined the documents provided to me. My responses are as follows.

- a. POL00104771 (2002) - I have no particular recollection of the document but it's reasonable to assume that I would have been part of its assurance at that time.
 - b. POL00030578, POL00104812 (2007) and POL0031008 (2010) - I would have been part of the assurance group for such a Group policy from my perspective in my role as Head of Investigation for Royal Mail.
 - c. POL00104806 (2007), POL0031004 (2008), POL0031003 (2009) and POL00030786 (2011) - I can't recall these documents specifically but it would be normal for me to have had awareness of such documents and if they were being reviewed, as Head of Investigation for Royal Mail.
 - d. POL00026573 (2010), POL00104857(2010) - These documents were for RM Group Security team only.
 - e. I have no knowledge of any of the remaining documents which all appear to be POL specific and all created after I had left POL in 2004.
7. When I arrived at POCL in 1996 I reported to a RSIM who in turn reported to the Head of Human Resources and subsequently the Head of Finance in one of 7 POCL Regions. To the best of my recollection the team consisted of 3 Investigations Managers, 3 Counters Managers 2 ID, 3 Security Managers and some administration support staff. A Post Office Security Executive sat in the POCL corporate centre setting physical and procedural Security policy. In 1999 following the Shaping for Competitive Success project PON restructured and merged 7 regions into 3 territories with the Security and Investigation functions in those territories reporting to a Head of Security. In the East where I became TSM I inherited a similar but larger structure. I believe the

West and North Territories were similarly structured. In 2002 following an internal re-organisation PON/POL moved to 3 teams with national specific responsibilities: - An Internal Crime and Investigation Team, a Physical and Procedural Security team and a third team that consisted predominantly of admin support and Burglary and Robbery liaison. I left for RM in 2004.

8. During my period in POCL/PON/POL the individual Investigator was responsible for the progression and conduct of an investigation held by them with input and advice as required from line managers and casework managers.
9. I have been asked about the role of the Financial Investigation Unit, and in what circumstances they would become involved in an investigation. I am unable to answer this question as the Financial Investigation Unit was introduced sometime after I had left POL in 2004
10. During my time in POL no other teams within POL were involved in criminal investigations and prosecutions.
11. During my time in POL, the legislation, policies, guidance and principles governing the conduct of investigations were predominantly the Police and Criminal Evidence Act (1984) Codes of Practice, the Criminal Procedure and Investigations Act (1996) and the POID manual subsequently translated into Group Policy, Procedures and Standards. Policies, procedures and standards were generally reviewed every three years and/or at any restructuring or if relevant legislation changed.
12. During my time in POL there was a Group Serious Complaints policy as guidance for dealing with complaints about members of the team in relation to their conduct in an investigation.

13. I have been asked about the nature of any supervision over criminal investigations by Security Managers. At no stage during my period at POCL/PON/POL from 1996 until I left in 2004 can I recall criminal investigations being carried out by people known as Security Managers. I believe it was a generic job title introduced in POL in later years. During my time criminal investigations were carried out by Investigation Managers and Security Managers conducted physical and procedural security reviews and inspections. Any reference to Security Managers carrying out criminal investigations will I believe relate to a time after I had left. I do not recall any Security Managers supervising or overseeing investigations carried out by Investigation Managers.
14. During my time up until 2004 the Post Office's approach to suspected fraud was in accordance with the RM Group policy. Where it was identified, it was to investigate and apprehend and prosecute where appropriate those responsible.
15. During my time until 2004 there was no difference in the approach to investigate a Crown Office employee or a SPMR or a SPMR's assistant.
16. Post SCS, as a separate Business Unit, POL had increasingly sought to develop its own identity as a Business. From around 2008 POL was increasingly operating very separately and independently as a Business as it moved inevitably to separate. Although the Group Security Director may have still had some reserved powers POL Security operated without any Group oversight and it had developed its own policies, procedures and standards, together with the training of its employees. Whilst my name is included in at the top of some kind of process map as the Head of Investigation of RM, I had

no knowledge or involvement in either POL00104900 or POL0104889. I do not specifically recall document POL00105098 but I do recall having involvement in developing a memorandum of understanding where RM and POL were attempting to agree primacy in cross business crime investigations. E.g. Where an RM postman steals cash from behind the PO counter or a PO counter clerk steals mail from behind the counter.

How and when the Security team became involved in an investigation

17. From my knowledge prior to 2004, audits would be conducted either as part of the Audit team's own risk programme, if an office was closing or transferring or if it was requested as part of an Investigation inquiry.
18. I have been asked to consider POL00084813 and explain in what circumstances an investigator would attend an audit of a branch and what their role was. I have no knowledge of this document as it relates to a date after I had left POL in 2004. During my time investigators played no role in the audit itself. If the investigator had requested the audit prior to an intended interview then I would have expected the investigator to attend the office before the audit had been completed. An exception would be if there was a possibility that evidence could be destroyed. If an unexpected deficit had been discovered by the audit team, then I would have expected the investigator to attend as soon as he/she could depending on other commitments/priorities.
19. I am unaware of any specific instructions for auditors but during my time prior to my departure from POL I would have certainly expected the Investigation

team to have been contacted if an investigator had requested the audit and/or depending on the size of any discrepancy.

20. I have been asked to consider POL00104929 and POL00105226 and answer a number of questions in relation to decision-making following a shortfall being identified during a branch audit. I have no knowledge of these documents as they relate to a date after I had left POL in 2004. During my time in POCL/PON/POL the decision to pursue an investigation into potential criminality was made by the Investigation team and based upon the evidence available at the time. The Security team were not involved in debt recovery at all. To the best of my knowledge this was conducted within the Finance part of the business. The local contract managers were not involved in the decision or otherwise to conduct a criminal investigation. I do not know if they were associated with in any decisions involving debt recovery. I cannot recall specific triggers for raising cases during my time in POCL/PON/POL. Cases for inquiry could be raised from many sources: client complaints, customer complaints, staff information, random checks, audit activity. The volume and frequency of discrepancies were obviously factors together with the amounts involved. Cases were categorised as theft, false accounting etc. depending on the offences committed. Fraud Act offences came in after my time in POL.

Involvement of the Security team in the suspension process

21. I have been asked to consider POL00104809 (2005). I have no knowledge of or involvement in the document but it includes references to agents and is likely a legacy document. I have also been asked to consider POL00105231 (2012). This is a Royal Mail only document and does not relate to POL.

22. I have been asked about the Security team's role in suspension decisions when a shortfall was identified. During my time in POCL/PON/POL between 1996 and 2004 an investigator would discuss the shortfall and the appropriateness of a suspension with the relevant Retail Network or Retail Line Manager. The Retail Line/Network Manager made the final decision to suspend.

23. During my time at POL up to 2004 there was no difference to the decision process for suspension involving a Crown employee or a SPMR or agent. The individuals who made the suspension decision in the business may have been in different operational lines of the business structure depending on the office being a Branch Office or a Sub office.

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

24. During my time at POL between 1996 and 2004 Investigation Managers were expected to follow the evidence and conduct their investigations in accordance with all relevant legislation and the RM Group policy, procedures and standards.

25. I have been asked to review a 14-page document, POL 00105223, that I have not seen before, was evidently written at least 9 years after I had left POL and to explain how it differs with processes that would have been in place during my time in POL. I don't have a specific document to compare it with but it appears to be a review of POL's casework process at the time. Broadly speaking it appears to follow a logical casework process that I'd have expected to see in my time: - covering the setting up of a file, source of information, other information or documents required, file construction,

reporting, association of necessary evidence (inc. tape transcripts, statements), obtaining process. The decision to set up a case appears to be at the discretion of a Team Manager rather than a casework manager. There are a number of forms that I do not recognise including FES and ECF. There are also a number of actions or information reference points in a number of areas that I am unaware of and/or that were not around during my time. These are Equifax, Stakeholder notification, statements from Fujitsu, call logs, full rota checks, PORA, Grapevine, Financial investigators, Credence. It also appears that external lawyers, Cartwright King, are advising on criminal cases.

Decisions about prosecution and criminal enforcement proceedings

26. I have been asked to explain my role in the development, authorisation, management and/or assurance of any of the policies set out in several documents that I have been provided with by the Inquiry. I have examined the documents signposted in this question. My responses are as follows:

- a. POL00030659 (1997) – I have no knowledge or recollection of this document.
- b. POL00030800 (2011), POL00031011 (2009)- I would expect to have been familiar with the 2 documents as Head of Investigation in RM but was not involved in their creation or management as they were owned by Legal Services.
- c. POL00031008 (2010) - It would be normal for me to have had sight and knowledge of such a document if it was being reviewed, as Head of Investigation for Royal Mail.

d. POL00030598 (2011)-This document relates to Royal Mail only and not POL.

e. I have no knowledge of any of the remaining documents which all appear to be POL specific and all created after I had left POL in 2004 and one after I had retired.

27. I have been asked to describe the Post Office prosecution policy. During my time in POL up to my leaving in 2004 there was a Group Prosecution Policy. To the best of my recollection POL did not have a separate policy at this time. If there was any recorded distinct POL policy document it wouldn't have differed in essence from the Group policy.

28. Solicitor's Office Criminal Law (later Legal Services) advised on whether the case was suitable for prosecution and advised appropriate charges. During my time in POL the decision to prosecute was then made by the nominated business prosecution authority.

29. During my time in POL up to my departure in 2004 the local contract managers (Retail Network or Retail Line Managers) played no part in the decision or not to prosecute.

30. During my time in POL up to my departure in 2004 the advice to prosecute was made by Solicitor's Office Criminal Law in accordance with the Code for Crown Prosecutors.

31. The nominated business prosecution authority had the benefit of the Criminal Law advice on each individual case. They had also undertaken a short training course delivered by the Solicitors Office on the legal requirements, the prosecution process and their role within it as the business authority to prosecute.

32. Legal advice was provided by internal solicitors in Criminal Law but if a case went to Crown Court, then external Counsel would also further advise.

33. During my time in POL up to 2004 no different approach to investigating was applied to a case involving an audit shortage than any other case of an investigation.

34. I have been asked in what circumstances were steps to restrain a suspect's assets by criminal enforcement methods such as confiscation proceedings considered. During my time at POL steps to restrain a suspect's assets did not take place and such action was not possible.

35. I have been asked who decided whether criminal enforcement proceedings should be pursued and what factors they considered when making such decisions. I cannot answer this question as no criminal enforcement proceedings took place during my time in POCL/PON/POL. Financial Investigators were introduced sometime after I had left in 2004.

Training, instructions and guidance to investigators within the Security team

36. I have been asked to consider POL00104805. If I recall correctly this document was a distance learning module developed in Royal Mail to supplement classroom training.

37. During my time in POL between 1996 and 2004 training took the nature of a POSIS residential induction training course, was detailed in the POID manual and subsequently in Group Policy, procedures and standards that developed as we moved to ways of working involving computer systems. During my time up until around 2004 all POCL/PON/POL interviews were generally led by an Investigation Officer/Manager at PEB (CM1) Level.

38. I cannot answer beyond 2004 as detailed above.

39. I have been provided with several documents by the Inquiry and asked if any of those documents were provided to investigators within the Security team.
- a. POL00105225 - I have no knowledge of this document which is a POL document apparently from 9 years after I left POL.
 - b. All of the other documents listed and detailed were developed by Royal Mail, intended for a Royal Mail audience, and to the best of my recollection circulated to Royal Mail Investigators only and placed upon the RM Security intranet site. By this time POL Security was operating totally independently and had developed its own guidelines, processes and procedures. I cannot recall if POL had access to our intranet site. I do not know what documents POL provided to the POL Security team.
40. During my time in POL between 1996 and 2004 taking witness statements formed part of the POSIS residential induction training course, was detailed in the POID manual and subsequently the Group policy, procedures and standards and in the P.A.C.E. Act Codes of Practice.
41. I have been asked if POL00104827 and/or POL00104826 were provided to investigators within the Security team. Both of the documents listed and detailed were developed by Royal Mail, intended for a Royal Mail audience, to the best of my recollection circulated to Royal Mail Investigators only and placed upon the RM Security intranet site. I cannot recall if POL had access to the RM Security intranet site. I do not know what documents POL provided to the POL Security team.
42. During my time in POL between 1996 and 2004 conducting searches formed part of the POSIS residential induction training course, was detailed in the

POID manual and subsequently the Group policy, procedures and standards and in the P.A.C.E. Act Codes of Practice.

43. I have been asked if POL00104828 and/or POL00104849 were provided to investigators within the Security team. Both of the documents listed and detailed were developed by Royal Mail, intended for a Royal Mail audience, to the best of my recollection circulated to Royal Mail Investigators only and placed upon the RM Security intranet site. I cannot recall if POL had access to the RM Security intranet site. I do not know what documents POL provided to the POL Security team.
44. During my time in POL between 1996 and 2004, conducting an investigation formed part of the POSIS residential induction training course, was detailed in the POID manual and subsequently the Group policy, procedures and standards.
45. During my time in POL between 1996 and 2004 obtaining evidence formed part of the POSIS residential induction training course, was detailed in the POID manual and subsequently the Group policy, procedures and standards.
46. I have been asked about what instructions, guidance and training were given to investigators about obtaining evidence held by Fujitsu in the course of an investigation. I cannot recall any guidance around Fujitsu during my time at POCL/PON/POL and I obviously can't comment after I left.
47. During my time in POL between 1996 and 2004 disclosure obligations formed part of the POSIS residential induction training course, was detailed in the POID manual and subsequently the Group Policy, procedures and standards with additional specific training post introduction of CPIA.

48. I have been asked if any of POL00104891, POL00104848 or POL00104893 were provided to investigators within the Security team. All of the documents listed and detailed were developed by Royal Mail and intended for a Royal Mail audience and to the best of my recollection circulated to Royal Mail Investigators only. They would also have been placed on the RM Security intranet site. By this time POL Security was operating totally independently and had developed their own guidelines, processes and procedures. I do not know what documents POL provided to the POL Security team.

49. During my time in POL between 1996 and 2004 report writing formed part of the POSIS residential induction training course, was detailed in the POID manual and subsequently the Group Policy, procedures and standards.

50. I have been asked if either of POL00104881(2011) or POL00104879 (2011) were provided to the POL Security team. These documents are RM documents only and intended for a Royal Mail audience and circulated to Royal Mail Investigators only. I do not know what documents POL provided to the POL Security team.

Analysing Horizon data and requesting ARQ data from Fujitsu

51. I have been asked to consider POL00105223 and POL00105213 and to address, prior to the introduction of the tool "Credence" in 2009, what analysis was done by Security team investigators of Horizon data when a SPM/ SPMs' assistant/ Crown Office Employee attributed a shortfall to problems with Horizon. I am unable to answer this question as I have no knowledge of the documents or the tools identified as they relate to dates after I had left POL in 2004. During my time in POCL/PON/POL I cannot recall any cases where

SPMRs/SPMRs assistants or Crown Office employees attributed a shortfall to problems with Horizon.

52. I have been asked to explain the process for requesting Horizon data from Fujitsu. During the period from Horizon's introduction until I left in 2004, I cannot recall any specific process for obtaining data but I do recall that requests for data printouts were only allowed to be very limited due to contract restrictions, making them difficult to obtain if required and therefore fairly rare.
53. I have been asked to consider POL00105222 and answer if there was a formalised process for requesting ARQ data from Fujitsu prior to publication of this document (September 2013). I am unable to answer this question as I have no knowledge of this document or any process relating as it refers to a date after I had left POL in 2004
54. I have been asked about ARQ logs and their use. I do not know what ARQ logs are or for what they were/are used.
55. I have been asked whose decision it was whether ARQ data was requested from Fujitsu in a given case. I cannot answer this question for the reason explained above
56. I have been asked where a shortfall had been identified and the SPM/ assistant/ Crown Office employee was attributing it to problems with Horizon but did not have corroborating evidence of material problems with Horizon, if ARQ data was requested from Fujitsu as a matter of course. I cannot answer this question for the reason explained above.
57. I have been asked if ARQ data was provided to a SPM as a matter of course when it was obtained from Fujitsu. I cannot answer this question for the reason explained above.

Cases against SPMs

58. I have been asked about my recollections of the criminal cases in respect of 24 named individuals. I have no recollection of any of these cases or names supplied. I have been asked to examine documents relating to 2 cases. Both would appear to have taken place after I had left POL and my name appearing in a box on a casework tick-list would seem to be a templated document that had not been amended after my departure.

59. I have been asked if there are any prosecutions which I had a role as investigator which I consider are relevant to the matters being investigated by the public inquiry. None at all.

60. I have been asked, looking back, if I have any concerns about any criminal cases in which I was involved. To the best of my recollection, I did not personally conduct any investigations into counters crime after 1998 and therefore I don't believe any of my cases would have involved Horizon. I have absolutely no concerns about any of the criminal cases that I conducted.

The Security team's role in relation to debt recovery

61. I had no role in or knowledge of debt recovery during my time in POL.

Knowledge of bugs, errors, and defects in the Horizon system

62. I had no personal concerns nor awareness of any concerns around the robustness of the Horizon system or problems with it. And therefore, I have none to report. I have been asked to consider POL00086845 and POL00088867 and to address whether the suggestion that system faults with

Horizon were "very rare" correspond with my understanding of the position in 2003. Yes, it would correspond to my opinion, as I was unaware of any faults.

Other matters

63. I have nothing to add.

I believe this statement to be true.

Signed:...

GRO

Dated:.....

7th June 2023

GRO

Index to First Witness Statement of Philip Gerrish

No.	URN	Document Description	Control Number
<u>1</u>	POL00104771	Post Office Ltd – Security Policy [Theft and Fraud by Sub Office Assistants]	POL-0080411
<u>2</u>	POL00030578	S02 Royal Mail Group Criminal Investigation and Prosecution Policy December 2007	POL-0027060
<u>3</u>	POL00104812	“Royal Mail Group Ltd Criminal Investigation and Prosecution Policy”	POL-0080444
<u>4</u>	POL00031008	RMG Ltd Criminal Investigation and Prosecution Policy v1.1 November 2010	POL-0027490
<u>5</u>	POL00104806	Royal Mail Group Security – Procedures and Standards: Standards of behaviour and complaints procedure No.10-X v2	POL-0080438
<u>6</u>	POL00031004	RMG Policy – Crime and Investigation (S2) – version 3.0	POL-0027486
<u>7</u>	POL00031003	Royal Mail Group Crime and Investigation Policy v1.1 October 2009	POL-0027485
<u>8</u>	POL00030786	Royal Mail Group Policy – Crime and Investigation (S2) v3 effective from April 2011, owner Tony March, Group Security Director	POL-0027268
<u>9</u>	POL00026573	RMG 20procedures & Standards – Proceeds of Crime Act 2002 & Financial Investigations doc 9.1 V1	POL-0023214
<u>10</u>	POL00104900	Undated ‘Separation Project – Criminal Investigations Policy for Post Office Ltd’	POL-0080532
<u>11</u>	POL00104889	Undated flow diagram of ‘Research, interpretation, preparation, development and publication of investigation procedures	POL-0080521
<u>12</u>	POL00105098	A memorandum of understanding on joint	POL-0080728

		investigation protocols post independence involving royal mail and post office ltd security	
<u>13</u>	POL00084813	Condensed Guide For Audit Attendance	POL-0081871
<u>14</u>	POL00104929	"Post Office Limited: Internal Protocol for Criminal Investigation and Enforcement (with flowchart)"	POL-0080561
<u>15</u>	POL00105226	Undated Appendix 1 – POL Criminal Investigations and Enforcement Procedure (flowchart)	POL-0080851
<u>16</u>	POL00104809	Royal Mail Group Security – Procedures and Standards: Suspension from duty No.6-X v1	POL-0080441
<u>17</u>	POL00105231	Royal Mail Internal Information Criminal Investigation Team: Suspension from Duty v1	POL-0080856
<u>18</u>	POL00105223	Security Operations Casework Review	POL-0080848
<u>19</u>	POL00030659	Post Office Internal Prosecution Policy (Dishonesty), Andrew Wilson December 1997	POL-0027141
<u>20</u>	POL00030800	RMG Policy – Prosecution (S3) Version 3.0	POL-0027282
<u>21</u>	POL00031011	RMG Prosecution Policy (undated) V2.1	POL-0027493
<u>22</u>	POL00030598	Royal Mail Prosecution Decision Procedure	POL-0027080
<u>23</u>	POL00104805	Royal Mail Group: Evidence and Witness Statements "E" Learning	POL-0080437
<u>24</u>	POL00105225	Post Office: A guide to interviewing	POL-0080850
<u>25</u>	POL00104827	Royal Mail Group Security Procedures & Standards: Witness Statements P&S Doc 5.4 v2	POL-0080459
<u>26</u>	POL00104826	Royal Mail Group Security Procedures & Standards: Appendix 2 to P&S 5.4 –	POL-0080458

		Managing the witness and structure & contents of witness statements v1	
<u>27</u>	POL00104828	Royal Mail Group Security Procedures & Standards: Searching No. 7-X v5	POL-0080460
<u>28</u>	POL00104849	Royal Mail Group Security Procedures & Standards: Searching doc 7.5 v6	POL-0080481
<u>29</u>	POL00104857	Royal Mail Group Security Procedures & Standards: Initiating Investigations doc 2.1	POL-0080489
<u>30</u>	POL00031008	RMG Ltd Criminal Investigation and Prosecution Policy v1.1 November 2010	POL-0027490
<u>31</u>	POL00104881	Royal Mail Internal Information Criminal Investigation Team: Guide to the preparation of suspect offender reports, England, Wales and Northern Ireland" v1	POL-0080513
<u>32</u>	POL00105223	Security Operations Casework Review	POL-0080848
<u>33</u>	POL00104891	Royal Mail Group Security Procedures & Standards: Appendix 1 to P&S 5.4 – Rules & Continuity of Evidence v1	POL-0080523
<u>34</u>	POL00104848	Royal Mail Group Security Procedures & Standards: Appendix 1 to P&S 9.5 Disclosure of Unused Material & The Criminal Procedure & Investigations Act 1996. Version 1.	POL-0080480
<u>35</u>	POL00104893	Appendix 7 to 7.4 – Dealing with Defence Solicitors & Complaints by Suspects v1	POL-0080525
<u>36</u>	POL00104879	Appendix 1 to 8.2 Suspect Offender Reports, Preamble Guide England, Wales and Northern Ireland v1	POL-0080511
<u>37</u>	POL00105213	Fraud Risk Security Pro-forma – Guide to	POL-0080838

		Obtaining Reports from Horizon - undated	
<u>38</u>	POL00105222	"Post Office: Security Investigations Data Handling Process (Fujitsu Horizon Data Request)" v1	POL-0080847
<u>39</u>	POL00052874	Casework management initial tick list of Tahir Mahmoud	POL-0049353
<u>40</u>	POL00052903	Casework Management Initial Ticklist- Oyeteju Adedayo	POL-0049382
<u>41</u>	POL00086845	Post Office Ltd Security Policy: Accounting Losses Policy for Agency Branches	POL-0083903
<u>42</u>	POL00088867	Post Office Ltd: Liability for Losses Policy for agency branches v2.0 January 2004	POL-0085925