

WITNESS NAME: KEITH GILCHRIST

STATEMENT NO: WITN10490100

DATED: 22 DECEMBER 2023

POST OFFICE HORIZON IT INQUIRY

FIRST WITNESS STATEMENT OF KEITH GILCHRIST

I, Keith Gilchrist, will say as follows:

Introduction

1. I am a former employee of the Post Office Limited and I worked within the business for around 3 years between June 2010 and June 2013. During this time I held the following positions: Security Manager and Team Leader.
2. This witness statement is made to assist the Post Office Horizon Inquiry (the **"Inquiry"**) with the matters set out in the Rule 9 Request dated 2 November 2023 (the **"Request"**). In order to produce this statement I have received legal assistance from Ashfords LLP. When seeking their assistance, I was assisted by the Post Office in the initial stage of confirming availability of insurance coverage, in order to cover the associated legal costs.
3. What I include in this statement is to the best of my recollection. Nevertheless, the Request relates to matters that occurred over 10 years ago, so there have been times where I have found it difficult to recall precise

details and I have had to defer to the accompanying documents enclosed to me. I have indicated clearly where this is the case.

Background

4. At some point in the first quarter of 2010 I applied externally for a part time role in the Post Office Limited. I recall the role being advertised as a part-time Security Manager, to look after the security of Northern Ireland Post Office cash in transit operations. I attended an interview conducted by Dave Pardoe and Lesley Frankland and by the time my vetting was completed I was offered a full time role as a Physical Security Manager for Northern Ireland. I accepted the job and started in June 2010.
5. My role of Security Manger entailed physical security of the Post Office. I was responsible for implementing security measures for the business in its cash in transit operations, its property, for its people and its assets. I was based in Belfast but after several months in post I was asked to cover the Northern parts of the UK, again from a physical security perspective only.
6. To the best of my recollection, there were three occasions where I carried out a role which did not relate to physical security. These are the three occasions where I attended interviews under caution as a second officer carried out as part of an investigation - I deal with this in more detail in paragraph 14 below.
7. During my time as a Security Manager I also delivered training to sub postmasters and other post office staff on security and risk management. I

have a Masters in Security and Risk Management, which I obtained from Leicester University in 2003.

8. When in my post as Security Manager I reported to my Team Leader, Lesley Frankland , who was based in Manchester. I recall that Lesley reported up to Dave Pardoe who was Senior Management within the Security Team and Dave Pardoe reported up to John Scott, who was the Post Office Head of Security.

9. At some point in early 2012 my Team Leader, Lesley Frankland, transferred to a different Post Office position outside of the Security Team. This may have been around April 2012 but I cannot recall for certain. At this time I was asked by Andy Hayward to temporarily step into a Team Leader position, where I would report to the following line managers: Andy Hayward, Rob King and Dave Pardoe. I primarily reported to Andy Hayward but I was also involved in a project where I reported to Rob King. This was project Grapevine, which I comment briefly upon in paragraph 20 below. If both Andy and Rob were off on leave I would report to Dave Pardoe. I believe this temporary Team Leader position was intended to last for a few months, during which there was an application process within the Security Team to fill the role permanently. I was successful in obtaining the role on a permanent basis, but I cannot remember if others applied or if I was just the most appropriate person for the job at that time. I cannot recall the exact date that I was appointed in to the role permanently, but I believe this was around the summer months in 2012.

10. I note that on documentation I have received from the Inquiry my role is referred to as a 'Fraud Team Manager.' I always referred to myself as a Team Leader, but for the avoidance of doubt, I believe that 'Team Leader' and 'Fraud Team Manger' mean the same thing. Simon Hutchinson (who was based in Northern Ireland) was recruited into the Security Manger position that I had vacated, to deal with physical security.
11. When in my Team Leader position, the following regional Security Mangers reported to me: Kevin Ryan (Greater Manchester) Michael Stanway (North England), Andrew Wise, (Midlands) Steve Bradshaw, (Liverpool, Cheshire and North Wales), Suzanne Winters (Northern Ireland) and Robert Daley (Scotland). At this time my recollection was that these Security Managers were primarily engaged in Post Office investigations, with the exception of Kevin Ryan who I think also did physical security.
12. From the outset I made clear to Andy Hayward that I would only agree to step into a Team Leader role on the proviso that I would not have to provide any in-depth investigation supervision to Security Managers unless I was properly trained on the processes and procedures followed by the Post Office in relation to investigations and the in-depth workings of a Post Office. I never received extensive training on these processes and procedures so my role as a Team Leader was to help manage the Security Managers mentioned in paragraph 11 above, in terms of logistical and administrative matters including carrying out team meetings to discuss workloads and progress. For example, I would look at how many cases they had on to see if workloads were manageable and I would check who would be best placed to attend

interviews as a second officer based on everyone's workloads and the location of the interview. I would also conduct one to one meetings on performance. I would also approve holiday leave and carry out other general administration. By the time I left the Post Office in June 2013, I do not believe I had provided supervision to any Security Managers in my Team as to the substance of the investigations they carried out. As far as I can recall the arrangement was that Andrew Daley would provide this supervision, who was a Team Leader in Case Management. I deal with this in more detail below within the section of my statement headed '*The Security Team's role in relation to criminal investigations*'.

13. During my time in the roles of both Security Manager and Team Leader, I do not believe I had any department or sub-postmaster disciplinary matters to address. I also never had any involvement in litigation case strategy or disclosure in criminal or civil proceedings.

14. I was not involved in the conduct of criminal investigations in general, apart from on three occasions where I sat in on interviews under caution with Sub Postmasters as a second officer; one in Scotland and two in Northern Ireland. I have no recollection of the Sub Postmasters interviewed on these occasions, except to say they were in relation to Post Offices in Strabane, Belfast and Glasgow. I believe that the reason I would have attended the interviews in Northern Ireland was due to my location, and the interview in Glasgow due to the unavailability of any other investigator to assist. My involvement in these interviews was to assist with setting up the room and taking the taped recording. I do not believe I asked the interviewee any

questions and I played no further role in these investigations beyond sitting as a second officer in the interviews.

15. I do not recall ever liaising with other Post Office departments in respect of the progress of any investigations in both my time as a Security Manager and a Team Leader.

16. Throughout my time as a Security Manager and Team Leader I received no extensive training on the operational practices and procedures of the Post Office Security Team, in relation to both physical security and investigations. I did receive a week's worth of brief training on the Police and Criminal Evidence Act (PACE) and other matters relating to investigations at some point towards the end of 2012, but I cannot recall exactly when. I comment further on this training under the heading '*Training, instructions and guidance to investigators within the Security team*' below.

The Security Team's role in relation to criminal investigations

17. I confirm that I have considered the following documents:

- 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]**;
- vi. "Royal Mail Group Security – Procedures & Standards – Arrest Procedures" (Version 2.0, May 2001) **[POL00104760]**;
- 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]**
- 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]**
- 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**]; -
- xxii. "Royal Mail Internal Information Criminal Investigation Team- Casefile Construction England, Wales and Northern Ireland" (Version 1.0, June 2011) [**POL00104877**].
- xxiii. "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**];

- xxiv. "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**];
- xxv. "Royal Mail Internal Information - Casework Management and PSO Products and Services" (Version 1.0, June 2011) [**POL00104888**];
- xxvi. "Post Office Prosecution Policy" (version 1.0, 1 April 2012) [**POL00031034**];
- xxvii. "Post Office Ltd PNC Security Operating Procedures" (August 2012) [**POL00105229**];
- xxviii. "Post Office Limited: Internal Protocol for Criminal Investigation and Enforcement (with flowchart)", (October 2012) [**POL00104929**];
- xxix. "Undated Appendix 1 - POL Criminal Investigations and Enforcement Procedure (flowchart)", (October 2012) [**POL00105226**];
- xxx. The undated document entitled "POL – Enforcement & Prosecution Policy" [**POL00104968**];
- xxxi. "Post Office Limited: Criminal Enforcement and Prosecution Policy" (undated) [**POL00030602**];
- xxxii. "Conduct of Criminal Investigations Policy" (version 0.2, 29 August 2013) [**POL00031005**];
- xxxiii. "Post Office Prosecution Policy England and Wales" (1 November 2013) [**POL00030686**];
- xxxiv. "Conduct of Criminal Investigations Policy" (version 3, 10 February 2014) [**POL00027863**];
- xxxv. "Conduct of Criminal Investigations Policy" (September 2018) [**POL00030902**].

18. I would like to make the Inquiry aware that a lot of the documents listed in paragraph 17 above were created before I started working at the Post Office in June 2010, and I cannot recall ever seeing them. There are also documents in this list that are dated after I left in June 2013. Again, I do not recall ever seeing these. For those documents that were created within the time I worked at the Post Office, it is likely I would have received them if they were circulated to the Security Team, but I am unable now to recall when or if I was aware of them at the time.
19. In terms of the organisational structure of the Post Office Security Team, I recall that there were various sub-departments within it, all reporting ultimately to John Scott, Head of Security. I believe that Dave Pardoe was senior management responsible for the criminal investigations and physical security side of the Post Office Security Team. I believe that John Bigley was senior management responsible for policy and strategy within the Security Team, with strategic and policy support also being provided by Dave Posnett and Graham Ward to John Scott, Dave Pardoe and John Bigley.
20. I also recall that there were North and South UK regional Managers, Andy Hayward and Rob King, who would report to Dave Pardoe. I cannot recall everything that Andy and Rob were responsible for, but I was aware that they looked after physical security and they worked on the introduction of Grapevine, which was a system based on a national intelligence model by which the Post Office could be briefed on crime in their area. I believe that Andy Hayward also had day to day supervision of the 3 regional security teams (the make-up of which I set out in paragraph 23 below) and was more

hands on with looking after the investigations side of the Post Office Security Team.

21. I also recall that there were specific members who were responsible for training within the Security Team. This was Paul Southin and Paul Whitaker and I think they reported to John Bigley.

22. There was also a Case Management sub-department within the Security Team, which consisted of Jane Banbury, Jane Owen and Andrew Daley as their Team Leader. The role of Case Management was to assign case management arrangements and assist with managing and responding to communications between the Security Team and the Post Office Legal department. They did this on behalf of the Security Team, removing significant administration obligations from Security Managers and the Team Leaders. As far as I can recall, the Case Management sub-department always existed when I worked within the Security Team. I do not know if there was a point before I joined where that department did not exist.

23. From my recollection, when I was a Team Leader the investigations side of the Security Team were split into the following three regional areas:

- i. South UK, where the Team Leader was originally Jason Collins and latterly Darrell Kennedy and he had 6 to 8 security managers reporting to him;
- ii. Mid UK, where the Team Leader was Helen Dickinson and she had 6 to 8 security managers reporting to her; and

- iii. North UK (including Scotland and Northern Ireland) where the Team leader was myself and I had the 7 security managers previously outlined in this witness statement reporting to me.

24. I would like to flag to the Inquiry that when I was a Team Leader in the Security Team, Andrew Daley (Team Leader in Case Management) reviewed the content of the North Region criminal investigation files on my behalf due to my lack of experience and knowledge of Post Office procedures and processes relating to criminal investigations and Horizon. He also assisted with providing supervision in investigations for the North UK Team. I believe Andy Hayward also provided supervision to the Security Managers in my team on occasion. As mentioned earlier in this statement, my experience as a Security Manager prior to me becoming a Team Leader only related to physical security and when I became a Team Leader I only really dealt with logistical and administration matters for my team.

25. The only other sub-department I recall is the Financial Investigation Unit who I believe were involved in recovering financial losses faced by the Post Office. I do not believe I had any involvement or interaction with that team so I am unable to comment on their specific roles.

26. I confirm that I have reviewed the following: **[POL00122075]**, **[POL00122078]**, **[POL00122170]**, **[POL00122037]**, **[POL00118289]**, **[POL00118377]**, **[POL00118290]** and **[POL00122103]**. I can see that **[POL00118290]**, **[POL00118377]** and **[POL00118289]** is email correspondence from 18.12.2012 relating to the renaming of Post Office investigating and reporting documents. I believe I am simply copied in to this

correspondence due to my role as Team Leader. It appears to be 'catch all' correspondence and I do not believe that I had any involvement in renaming or carrying out any review of the documents. I can see from the emails that it was Suzanne and Robert who were requested to review the Northern Ireland and Scotland forms referred to within this correspondence.

27. I can see that the email from me to Andy Hayward dated 06.02.2013 in the chain at **[POL00122103]** relates to the identification of a legal firm in Northern Ireland to assist and represent the Post Office in criminal investigations and prosecutions in Northern Ireland. McCarten Turkington and Breen was the firm who entered into discussions with Post Office but I do not think this was formalised prior to my departure from the Post Office in June 2013. I believe the rationale for this was that historically the Police Service of Northern Ireland (PSNI) assisted the Post Office by accepting their investigation files at their Central Processing Office where I believe they conducted a check of the papers and then electronically submitted them to the Director of Public Prosecutions. I believe the Security Managers working on cases in Northern Ireland would have sent their investigation file to the PSNI directly, perhaps with the assistance or on advice from Case Management. Due to reducing numbers of police officers and budget strains the PSNI were reviewing all services provided and this was one under threat of termination. If the police were not going to assist in this way, the Post Office would need other external assistance with checking the papers and sending files to the Director of Public Prosecutions. I do not know how these discussions progressed following my departure.

28. I have no recollection of the emails at [PO 00122078] dated 05.02.2013 and at [POL00122170] dated 11.03.2013, nor of the meeting mentioned within by Andy Hayward. I could have attended this meeting but I do not remember if I did. It looks like it related to having a final review meeting to make sure all amendments to the Post Office policy had been addressed. I cannot recall if I had any direct involvement in the formulation or amendment of this policy, apart from the submission of opinions and ideas to Andy Wise via email, as mentioned directly below.

29. I can see that the email dated 03.01.2013 at [POL00122037] is an email from me to Andrew Wise, who with Rob King was reviewing the Post Office investigation polices for the Security Team. I note that I am seeking clarification as to why we were required to report discipline matters to a contract manager prior to court proceedings. I do not believe that this is me playing a part in managing and or developing the procedure around this. To the best of my recollection I was providing my opinion on the required course of action and it is clear from this email that I believed it was nonsensical and unnecessary. I believe the rationale I had for sending this email was that I thought that allowing discipline matters to be progressed beyond a suspension prior to the outcome of a criminal matter would be unfair on the person subject to an investigation. I also thought it could potentially interfere with the criminal investigation and any potential proceedings, as the discipline reports were available to the Sub postmaster prior to the completion of the investigation. I would like to emphasise that this email was not an attempt by me to prohibit appropriate disclosure at interview stage, on completion of an investigation or subsequently at court. I just did not think it was appropriate to

be sharing the details of a criminal investigation with anyone outside of the Security Team, beyond advising interested Post Office departments that a criminal matter was being investigated and that any subsequent proceedings were pending or yet to be decided. I believe that any further discipline procedures beyond a suspension should only have been implemented following the ultimate outcome of a prosecution and whatever those further discipline procedures were should have been picked up by the Contract Manager then.

30. I believe that the following legislation, policies and / or guidance governed the conduct of investigations conducted by the Security Team during the period I worked within it:

- i. Police and Criminal Evidence Act 1989;
- ii. Theft Act 1968;
- iii. Police and Criminal Evidence (Northern Ireland) Order 1989
[POL00121591];
- iv. Post Office Prosecution Policy 2012 **[POL0031034]**; and
- v. Post Office Ltd PNC Security Operating Procedures **[POL00105229]**.

31. I believe elements of the legislation and policies outlined above may have been covered in the week's training course I received in late 2012 on PACE and investigations in general, which I deal with later in this statement. I know that there is likely to be other legislation, policies and guidance that governed the conduct of investigations conducted by the Security Team, but I am not aware of what these are. As stated above, I did not really get involved in the substance of criminal investigations.

32. The only difference I was aware of between the policies and legislation governing investigations conducted by the Post Office Security Team in England and Wales and Northern Ireland was the submission of investigation files in Northern Ireland to the Police Service in that jurisdiction. The Northern Ireland Police Service would then put the matter onto their electronic case file system and would then forward the file to the Director of Public Prosecutions to obtain a decision on whether to pursue a prosecution. There was a similar process in Scotland via the Procurator Fiscal. As far as I can recall, it was the Post Office Security leaders, John Scott and Dave Pardoe who made the decision to prosecute for England and Wales in consultation with the Post Office Legal department. They may also have had some role for Scotland and N. Ireland but I am unaware of that process if they did.

33. I cannot recall there being any impact of the separation of the Post Office from Royal Mail in relation to the way investigations were conducted within the Post Office. I had only been employed for 6 months by the time the split occurred and I was not involved in investigations at all.

34. I do not know what the process was to deal with any complaints raised against the Post Office Security Team in relation to the conduct of an investigation. As far as I can recall I never received or dealt with any complaints to this regard.

35. In terms of the supervision provided to Security Managers, each Security Manager had a Team Leader who they could go to in relation to any queries on their cases or in relation to any other day to day issues. In turn, Team Leaders had line managers who they could contact if they needed assistance

or guidance with the supervision they were providing to Security Managers. There was also the Post Office Legal Team who could provide professional assistance and guidance to Security Managers and Team Leaders in relation to investigations upon request, but I am not sure what sort of requests these would have been. I presume, for example, it could have related to what other evidence was needed in a case. I believe that these were the supervision arrangements in place for Security Managers in all regions, however, as explained above it was slightly different for my team as whilst I was the Team Leader for the North UK region, I did not provide supervision on the substance of investigations to the Security Managers within that team. I only dealt with logistical and administrative matters, but the arrangement was that the Security Managers within my team could go to Andrew Daley or Andy Hayward for support and supervision on their files.

36. I have no experience or recollection of any difference in policy and practice regarding the investigation and prosecution of Crown Office employees in comparison with the investigation and prosecution of SPMs and/or their assistants.

Audit and investigation

37. I confirm that I have considered the document "Condensed Guide for Audit Attendance" (version 2, October 2008) [POL00104821]. I would like to flag to the Inquiry that I was never an auditor in the Post Office, and I have no recollection of ever attending an audit during my time as a Security Manager and a Team Leader. From review of the documents provided to me I believe that the circumstances in which a Security Manager would attend an audit

would be where there was a suspected crime after a cash shortage or potential fraud was discovered by the audit team. Reflecting on my time as a Team Leader, I do not think it would have been logistically possible for the Security Managers in my team to always attend an audit on the day, as they covered a very wide area within the UK.

38. As already alluded to above, I was not heavily involved in the substance of investigations in general, so I am unable to set out all the steps that would have been taken by the Security Manager when attending an audit. However, I would have assumed that where they did attend their role would be to search for and seize appropriate evidence of any potential criminal wrong doing. I believe that they would have had to treat anything seized as an exhibit and would have labelled and secured it for future reference in an interview, and to be included in their investigation files. I think this evidence could have been receipts and stock books and information from the auditors, but I am not sure of this for certain. I was not aware that this also would have included printouts obtained on the day by the auditors from the Horizon system - I learned this recently from following other evidence provided in the Inquiry. I would assume that upon having a suspicion of a criminal offence having been committed by the SPM, deputy or staff, the Security Manager in attendance at the audit would also have the responsibility to caution those who were suspected before they could proceed to ask any further questions. I believe that Security Managers may have also requested to search home addresses if considered appropriate and with the property owner's permission.

39. As far as I am aware, following an audit and a shortfall being found, the Auditors would report their findings to Case Management or directly to the Team Leader or one of the Security Managers for that area and I believe a case would then be commenced. Whether that commencement into an investigation was approved by the Security Manager's Team Leader or Regional or Senior Manager in consultation with Case Management I cannot recall. Being a Team Leader, I may well have got phone calls from Auditors to say they believed there was a short fall at a branch, but if I did I believe I would have reported this to Case Management to allocate it out to a respective Security Manager to investigate. I think I only ever allocated a case out to Security Mangers directly on one occasion. This was the case involving the Whitehaven branch.

40. As far as I can recall I was never involved in debt recovery and have no knowledge of how and when instances would be referred to there.

41. From my recollection, the Contract Manager took a decision whether to suspend the SPM when an investigation had been raised, but they had no input into the decision as to whether to commence a criminal investigation.

42. I believe that the trigger for commencing an investigation was an 'unexplained loss', but I do not recall a specific figure that would trigger this. There was no change to this during my time with the Post Office as far as I can recall.

43. I have considered section 7 of [POL00085977]. Unfortunately I have no knowledge of the differences between the audit process between Northern Ireland and England and Wales.

Decisions about prosecution and criminal enforcement proceedings

44. In England and Wales, I was under the impression that decisions on whether to prosecute any SPM or Post Office employee were taken by senior management in the Post Office (for example, John Scott and Dave Pardoe) in full consultation with the Post Office Legal department. From recollection I was never involved in the decision making process and I am unaware of the criteria they used when deciding on whether to prosecute. In Northern Ireland I believe that the decision to prosecute was ultimately taken by the Director of Public Prosecutions. In Scotland, prosecutorial decisions were ultimately taken by the Procurator Fiscal. Northern Ireland and Scottish case files may well have been marked from a compliance standpoint and potentially reviewed by Dave Pardoe first, but I do not know for certain. I have no recollection of these processes changing during my time at the Post Office.

45. I have considered paragraphs 4.3 and 4.4 of [POL00031034]. I have no recollection of any disagreement arising in relation to investigations and prosecutions between Post Office and prosecutorial authorities. During my time with the Post Office I do not recall experiencing any variance from the prosecution policies put in place by the Post Office in any part of the UK.

46. I do not have any knowledge of the circumstances in which steps were taken to restrain a suspect's assets by criminal enforcement methods such as confiscation proceedings. I believe this was dealt with by the Financial Investigation Unit, and I do not recall having any involvement in their work, nor do I know who decided whether criminal enforcement proceedings should be pursued and what factors were considered when deciding this.

Training, instructions and guidance to investigators within the Security team

47. As mentioned earlier in this statement, my only experience of training during my time with the Post Office was a one week course towards the end of 2012 which covered PACE and other matters relating to investigations. I believe it was Paul Southin and Graham Ward who delivered this training to me internally and it formed the first part of my induction when appointed permanently into my Team Leader role. I was then meant to receive further training on the workings of a Post Office and the relevant Post Office policies and procedures relating to investigations, but this never occurred. I recall that the week's training course covered elements of PACE, taped interviewing, the taking of witness statements, the caution, seizing and recording of exhibits, giving evidence in court and possibly the definition of theft. I remember that obtaining corroborating evidence where required was also part of the training course, but I do not remember this covering obtaining evidence from Fujitsu. I think it was more focussed upon obtaining evidence from other witnesses such as other employees at the branch.

48. I am unable to recall if the training included anything on investigating a case 'fully', but I imagine that emphasis would have been placed on the responsibility to make sure that all lines of Inquiry were identified, followed and further investigated where necessary.

49. I believe that the Post Office did train and advise staff on their disclosure responsibilities, but I cannot recall if I received this training during the week's training course. I believe that training on disclosure may have been provided by circulation of explanatory training material or training conducted by the law

firm Cartwright King. If it was delivered by Cartwright King, I do not think I attended. I only ever recall going to their offices once and I think it was for a Christmas networking event. I do vaguely remember discussions being held on disclosure in internal meetings on the need for material to be fully disclosed whether it is positive or negative in a case. I remember that items could be put on sensitive schedules, but I cannot recall what evidence this was specifically. I think it may have related to whistleblowing type evidence. Unfortunately I cannot remember when this was or who conducted these discussions. What I do recall is that I was never responsible for obtaining disclosure in any investigation and I never completed or reviewed any disclosure schedules in my role as a Security Manager or Team Leader.

50. I can recall circulars and/or directions being disseminated within the Security Team on file preparation, structure and guides on what needed to be included in a prosecution file, but I cannot recall when this was. I would not have been required to consider any criminal investigation document prior to my appointment as Team Leader. Any that I did receive when I was Team leader I would have disseminated to the Security Managers within my team and would have discussed them, if necessary, at team meetings. I would have also raised issues on my line manager's behalf, had that been necessary for clarification purposes.

51. I have considered [POL00121467], [POL00121485], [POL00129311], [POL00158977] and [POL00158978]. Prior to receiving the request, I do not recall ever seeing [POL00121467] and [POL00121485] previously. In terms of [POL00129311], I can see I was invited to attend a Cartwright King training

session, but I do not recall attending. By the 11 June 2013 I would have had handed in my notice of resignation and I doubt I would have travelled for training that would not have been of any future use or relevance to me.

52. With reference to the email at [POL00158977] and the attached document at [POL00158978] I have no recollection of receiving both of these emails. It seems to have been a 'catch all' communication email within the Security Team, at which time I was merely involved in physical security and would have most likely disregarded the content as it would not have been relevant to my role.

53. I have considered David Posnett's email to me and others dated 23 May 2011 at [POL00118096] and the documents contained within the attached compliance zip file at [POL00118108], [POL00118109], [POL00118101], [POL00118102], [POL00118103], [POL00118104], [POL00118105], [POL00118106] and [POL00118107]. I do not recall the email at [POL00118096], nor do I recall the conference call on 26 May 2011 for the North Security Team that the email refers to. I was at this time only dealing with physical security and if this call was not relevant to my role it is likely I would not have attended. As I was only doing physical security and this related to the compliance of investigations, I believe it is likely I would have disregarded the email altogether.

54. I am aware of the form contained at [POL00118108] existing as I knew that the Security Managers had their casefiles scored from a compliance standpoint. The scoring may have been used in one to one performance reviews but I cannot fully recall. I had seen some of these later in my career

with the Post Office as Team Leader, but from my recollection I do not believe I ever marked a Security Manager's file. I remember on one occasion I challenged a mark received by, Steve Bradshaw on the compliance of one of his files. He would have informed me about it as I was his Team Leader. I cannot remember the specific details of that file, but I remember feeling that the mark was unfair.

55. I confirm I have considered [POL00118109], [POL00118101], [POL00118102], [POL00118103], [POL00118104], [POL00118105]. I cannot recall if I ever received these documents. I was aware of the systems revolving around putting together a case file, but not in any detail.

56. I do not recall ever seeing [POL00118106]. From my recollection I did not ever maintain a notebook in my role as a physical Security Manager or as Team Leader, although, I could have been provided with one. I believe that I may have signed the Security Managers' notebooks for the three interviews I sat in on as a second officer (mentioned in paragraph 14 above).

57. I have considered the Casework Management document from 2000 at [POL00104747] and the 2002 Casework Management document at [POL00104777], including the sections relevant to Northern Ireland. I do not recall seeing these documents previously. I have reviewed the second, third and fourth bullet points on page 2 of the 2000 version but as I do not think I ever saw this document, I am unable to say what I would have understood the guidance given within these bullet points to mean at the time.

58. I have also reviewed the first, second and third bullet points on page 2 of the 2002 version. I cannot remember seeing this document but later when I

became a Team Leader I must have considered the particular guidance which was in force at the time and understood it to mean that discipline matters were to be sent to a contract manager prior to court proceedings being commenced. As dealt with in paragraph 29 above, I did not agree with this process and I raised my concerns in the email dated 03.01.2013 at **[POL00122037]** to Andrew Wise.

59. I am unsure of the circumstances in which investigations became subject to compliance checks, their purpose, the process for those checks being conducted and who conducted them. I believe that it is likely that compliance checks were required to ensure consistency over case files and to identify if any extra training was needed in certain areas.

60. I do not know what the status of the suite of compliance documents attached to the email from David Posnett dated 23 May 2011 was at the time they were circulated; I had no involvement in developing or managing any of these documents. It is likely that the purpose of those documents were to achieve standardisation and identify areas of required training.

61. I have considered 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]**. I do not recall seeing this previously and I do not know how this related to the Offender Report template at **[POL00118102]** as I never had to complete one of these reports. I also do not understand its relevance to the Post Office's disclosure obligations in relation to information about Horizon bugs, errors and defects. I had very little knowledge on the processes followed by the Post Office in relation to

disclosure and I did not really know anything about the Horizon system because as stated earlier in this statement, I never conducted criminal investigations as Security Manger, nor did I supervise on the substance of any when I was a Team Leader.

62. I have considered the "Identification Codes" at [POL00118104] and I do not know who wrote this. I do not remember ever seeing this document because if I had I would have raised concerns about it to management as the identification codes used within it are entirely inappropriate. I do not think I would forget seeing something like this, which makes me think it even more likely that I would have disregarded the email from Dave Posnett on 23 May 2011, to which this document was attached. I do not know if anyone else raised concerns to management to say this document needed to be amended.

63. I have considered [POL00122145] and [POL00122150] and I can see that I sent these emails following an incident at the Whitehaven branch. I believe this was a Crown Office branch and I think I appointed Steve Bradshaw to be the Lead Investigator. I think I asked Dave Posnett to supply me with the relevant policy documents around Crown Branches as I had no idea about crime policy at the time. It is clear that he sent me these documents and after my review I was not happy with the circumstances. From memory I think the suspect offender in this matter was able to be disciplined and they resigned before the matter could be investigated. This just didn't make sense to me and I was not sure if it was a one off. I wanted to know why it had happened and that is why I asked Andrew Wise to include it in his casework review.

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

64. I confirm that I have considered [FUJ00225012] and I can see that I am copied in to an email in this chain from Andrew Wise on 10 January 2012. I believe I am copied in due to being the Team Leader, to keep me in the loop about the progress of the file from a work load perspective and the difficulties being experienced in obtaining ARQ data in this matter. However, this email appears to be directed specifically to Jayne Bradbury and Andy Hayward. As mentioned earlier in this statement, Andy Hayward would provide supervision and support to Security Managers who fell within my region if it related to the substance of an investigation. I have no direct recollection of this email and I do not have any knowledge of what analysis was done by Security Managers of Horizon data when a SPM / SPM's manager(s) or assistant(s) / Crown Office employee(s) attributed a shortfall to problems with Horizon. I was not trained in this and from my recollection I had no direct involvement with Fujitsu, or in obtaining any sort of data from them. The only thing I can vaguely remember is that there may have been a cost to obtain data from Fujitsu.

65. I have no knowledge of whether ARQ data was requested from Fujitsu as a matter of course when an SPM / SPM's manager(s) or assistant(s) / Crown Office employee(s) had attributed any shortfall discovered to problems with Horizon. I also do not know if ARQ data was provided to SPMs if it was obtained from Fujitsu following the identification of a shortfall.

66. I have considered [POL00121881] and I have no direct recollection of this email. From reading it I believe that I would have cascaded this email to the North Team of Security Managers at the next team meeting or by email to make sure the instructions were followed, but I cannot recall. I remember sitting with Suzanne Winters at some point and her boxing stuff up but I cannot be sure if it was ARQ data or when this was.

67. During all of my time working in the Post Office as both a Security Manager and a Team Leader, I do not recall ever having any contact with Gareth Jenkins, Penny Thomas or any other member of Fujitsu management or staff.

68. I did not know who Gareth Jenkins was before receiving the Request, and I had no knowledge of his role in relation to criminal prosecutions. I knew at the time that the Post Office had cases on where the integrity of Horizon was being challenged at court and experts were required to rebut this challenge, but I was unaware of Gareth Jenkins' involvement.

Relationship with others

69. As far as I recall, I never had any dealings with any external solicitors in any investigation matters, whether those investigations were based on Horizon data showing apparent shortfalls or not. The only time I spoke with solicitors was when I assisted with the identification of a law firm in Northern Ireland to assist and represent the Post Office in criminal investigations and prosecutions in that region. I have dealt with this in detail in paragraph 27 above.

Prosecutions in Devolved Nations

70. As explained earlier in this statement, I did not get involved with the conduct of investigations as a Security Manager, except on the three occasions where I sat in on an interview as a second officer. I did not conduct the interview and I do not believe I interjected to ask my own questions. After assisting in these interviews I played no further role in the investigation.

71. As far as I am aware the process in which investigations were conducted in all Regions were the same, but there were minor variances between PACE being applied in England and Wales and Northern Ireland. For example, I believe there was a slight difference of wording in the cautions to be provided. I believe this was covered in the week's training I received, as covered under the above heading - 'Training, instructions and guidance to investigators within the Security team'. I cannot recall what the other minor differences were. The primary difference from my recollection related to who took the prosecutorial decisions, which I have set out in paragraphs 32 and 44 above.

72. I have considered [POL00158388], but I am unable to explain what instructions were complied with in preparing a prosecution file to support criminal proceedings in Northern Ireland as I had no direct involvement in preparing any prosecution files as a Security Manager, nor of reviewing them in my role as a Team Leader. As far as I am aware the Post Office in England & Wales, Scotland and Northern Ireland all followed the same file preparation process. I managed Security Managers for North England, Scotland and Northern Ireland (albeit not on the content of casefiles) and I don't remember

having instructions from my line manger or anyone else that a different approach should be taken in each nation.

73. I worked with Suzanne Winters on two cases in Northern Ireland, supported by other North Team Security Managers as required. These are the cases involving branches in Belfast and Strabane where I only sat in as a second officer in an interview, as mentioned in paragraph 14 above.

74. I do not recall encountering any difficulties while providing support to Suzanne Winters on the two cases in Northern Ireland. I did not work on any other cases, but there might have been issues with logistics to get people to attend branches on an audit or to carry out an interview due to the location of the office and the workload of the team of Security Managers who cover the particular region.

Involvement in criminal prosecution case studies being examined by the Inquiry

75. I have considered [POL00044025], [POL00046250] and [POL00046635].

These are case closure reports forwarded to me by Steve Bradshaw, merely to update me on his work load to assist me in my logistical role as Team Leader. I do not know why I am referred to as a Security Programme Manager in these documents. I always referred to myself as a Team Leader and I assume 'Security Programme Manager' is just another variation to the job role name.

Prosecution of Grant Allen

76. I confirm I have considered the following documents provided in connection with this prosecution:

- i. The Audit Report dated 2 February 2012 at [POL00089081];
- ii. The email dated 7 February 2012 at [POL00089237];
- iii. The Record of Taped Interview re. interview of 19 April 2012 at [POL00089670] (part 1), [POL00089671] (part 2);
- iv. The Investigation report dated 1 May 2012 at [POL00089426];
- v. The email from Andrew Bolc dated 4 July 2012 at [POL00089294] and the attachments at [POL00089454], [POL00089057] and [POL00089455];
- vi. The summons dated 19 July 2012 at [POL00089072];
- vii. The report dated 16 August 2012 at [POL00089259] (in which I am mentioned);
- viii. The unsigned witness statement of Stephen Bradshaw dated 1 May 2012 at [POL00089560];
- ix. The unsigned statements of Richard Cross and Andrew Wise dated 17 September 2012 and 1 May 2012 respectively at [POL00089561]; and
- x. The list of witnesses at [POL00089346] and the list of exhibits at [POL00089351].

77. I have no direct memory of the specific facts or background to this case and therefore am reliant on the documents above to aid my memory. What I do recall is that I was appointed to a temporary Team Leader role for the North Security Team in April 2012, and the Grant Allen case was being investigated at this time by Stephen Bradshaw, who was a Security Manager within the

North Team. I do not believe that I had any direct or indirect dealings with Mr Allen. I also had no input in relation to the conduct of the investigation whatsoever, with the exception of authorising the interview of Mr Allen merely from a risk perspective for the Security Managers working on the case – Stephen Bradshaw and Michael Stanway. This is why my name appears on the Risk Assessment report at [POL00089259]. I believe that a risk assessment would be carried out before all interviews to ensure the safety of Security Managers, for example, if there was a potential risk of the interviewee being aggressive. I can see that as the interview was to be conducted in the Post Office premises, I identified no risks. At team meetings chaired by me I would have asked for an update on all investigations for the Security Managers within my Team and I assume the progress of Mr Allen's investigation would have been updated to me accordingly by Steve Bradshaw. I would have been asking for updates of this sort in order to give me an indication on the Security Managers' workloads within the Team, to assist me with dealing with logistical and administrative matters such as who had best availability within the team to be the second officer in an interview in another case that had arisen etc.

78. My first involvement in the case was my authorisation on the interview risk assessment on the 16th April 2012. I do not believe that I had any previous involvement in the investigation.

79. I have considered the Judgment of the Court of Appeal in Grant Ian Allen & Others v Post Office Limited [2022] EWCA Crim 1197 at [RLIT0000039]. I do not feel in a position to comment upon how the investigation and prosecution

of Grant Allen was conducted. The reason for this is because I do not have any real experience of conducting investigations myself within the Post Office and I do not have enough knowledge of the particular Post Office processes and procedures implemented in relation to conducting investigations and prosecutions. For those who were convicted and subsequently acquitted, I have every sympathy.

General

80. I was aware from team meetings that the integrity of the Horizon system was being challenged in some cases and that the Post Office was working with an expert or experts to respond to those allegations. I did not know any further detail beyond this. As I was not involved in conducting any Post Office investigations or seeing a case through a prosecution I do not think that I would have thought about a challenge to the integrity of Horizon in one case being relevant to other ongoing or future cases at that time. I can remember that the general Post Office position was that Horizon was an accurate computer system. Looking at this with hindsight, in my opinion there should have been no further prosecutions if there was any doubt that there could have been an issue with Horizon until this was verified for certain.

81. Other than the matters already contained within this statement, there are no other matters relevant to Phase 4 of the Inquiry that I would like to draw to the attention of the Chair.

Statement of Truth

I believe the content of this statement to be true.

Signed: **GRO**

Dated: 22 December 2023 | 10:36:20 GMT

Index to First Witness Statement of Keith Gilchrist

No	URN	Document Description	Control Number
1.	POL00104747	Investigation Policy: Casework Management (England & Wales) v1.0	POL-0080387
2.	POL00104777	Investigation Policy: Casework Management (England & Wales) v4.0	POL-0080417
3.	POL00104754	Investigation Policy: Rules & Standards v2.0	POL-0080394
4.	POL00030687	Investigation Policy - Investigation Procedures v2	POL-0027169
5.	POL00104762	Investigation Policy: Disclosure of Unused Material, Criminal Procedures and Investigations Act 1996 Codes of Practice	POL-0080402
6.	POL00121455	Security Managers' Guide to the Prosecution Support Office	POL-0127718
7.	POL00104760	Investigation Policy: Arrest procedures v2.0	POL-0080400
8.	POL00039952	Investigation Policy: Notes of Interview - Northern Ireland	POL-0036434
9.	POL00094163	Royal Mail Group Security Procedures & Standards in relation to conducting searches	POL-0094286
10.	POL00121591	Codes of Practice 2007 (Police and Criminal Evidence) Northern Ireland Office - Order 1989 Article 60, 60A and 65.	POL-0127853
11.	POL00030578	Royal Mail Group Ltd Criminal Investigation and Prosecution Policy	POL-0027060
12.	POL00104812	Royal Mail Group Ltd Criminal Investigation and Prosecution Policy	POL-0080444
13.	POL00104806	Royal Mail Group Security – Procedures and Standards: Standards of behaviour and complaints procedure No.10-X v2	POL-0080438

14.	POL00121607	Royal Mail Group-An Inspection of the Royal Mail Group Crime Investigations Function: July 2008. Inspection Report	POL-0127869
15.	POL00031003	Royal Mail Group Crime and Investigation Policy v1.1	POL-0027485
16.	POL00030580	Post Office Ltd - Security Policy: Fraud Investigation and Prosecution Policy v2	POL-0027062
17.	POL00030579	Post Office Ltd Financial Investigation Policy	POL-0027061
18.	POL00026573	RMG Procedures & Standards - Proceeds of Crime Act 2002 & Financial Investigations doc 9.1 V1	POL-0023214
19.	POL00104857	Royal Mail Group Security Procedures & Standards: Initiating Investigations doc 2.1	POL-0080489
20.	POL00031008	RMG Ltd Criminal Investigation and Prosecution Policy v1.1 November 2010	POL-0027490
21.	POL00104853	Post Office's Financial Investigation Policy	POL-0080485
22.	POL00104855	Post Office Ltd. Anti-Fraud Policy	POL-0080487
23.	POL00030786	Royal Mail Group Policy - Crime and Investigation (S2) v3	POL-0027268
24.	POL00104877	Royal Mail Internal Information Criminal Investigation Team: Casefile Construction England, Wales and Northern Ireland v1	POL-0080509
25.	POL00104879	Appendix 1 to 8.2 Suspect Offender Reports, Preamble Guide England, Wales and Northern Ireland v1	POL-0080511
26.	POL00104881	Royal Mail Internal Information Criminal Investigation Team: Guide to the preparation of suspect offender reports, England, Wales and Northern Ireland v1	POL-0080513
27.	POL00104888	Royal Mail Internal Information: 8.11 Casework Management and PSO Products and Services v1	POL-0080520

28.	POL00031034	Post Office Prosecution Policy V1	POL-0027516
29.	POL00105229	Post Office Ltd PNC Security Operating Procedures	POL-0080854
30.	POL00104929	Post Office Limited: Internal Protocol for Criminal Investigation and Enforcement	POL-0080561
31.	POL00105226	Undated Appendix 1 - POL Criminal Investigations and Enforcement Procedure (flowchart)	POL-0080851
32.	POL00104968	POL - Enforcement and Prosecution Policy	POL-0080600
33.	POL00030602	POL: Criminal Enforcement and Prosecution Policy	POL-0027084
34.	POL00031005	Conduct of Criminal Investigation Policy for the Post Office. (Version 0.2)	POL-0027487
35.	POL00030686	Post Office Prosecution Policy England and Wales (effective from 1/11/13, review 1/11/14)	POL-0027168
36.	POL00027863	Conduct of Criminal Investigations Policy v0.3	POL-0024504
37.	POL00030902	Post Office Conduct of Criminal Investigation Policy	POL-0027384
38.	POL00122075	Email from Keith Gilchrist to Andy Hayward re New Criminal Prosecutions Policy Meeting Monday 4 February	POL-0128320
39.	POL00122078	Email from Helen Dickinson to Andy Hayward re New Criminal Prosecutions Policy meeting Monday 4 February	POL-0128323
40.	POL00122170	Email chain from Andy Hayward to John M Scott, Helen Dickinson, cc'ing Rob King and others re: New Draft Criminal Enforcement & Prosecution Policy EPP.	POL-0128413
41.	POL00122037	Email from Keith Gilchrist to Andrew Wise re Enforcement Policy and Protocol	POL-0128285
42.	POL00118289	Email from Dave Posnett to Rob King, Andy Hayward, Jarnail Singh cc Suzanne Winter Robert	POL-0119426

		Daily, Keith Gilchrist and Graham Ward re Review POL investigation forms	
43.	POL00118377	Index to POL Investigation Forms	POL-0119514
44.	POL00118290	Index to GS Obsolete Investigation Forms - undated	POL-0119427
45.	POL00122103	Email from Keith Gilchrist to Andy Hayward regarding New Criminal Prosecutions Policy meeting Monday 4 February	POL-0128348
46.	POL00104821	Condensed Guide for Audit Attendance v2	POL-0080453
47.	POL00085977	Audit Process Manual - Chapter 3 - Performing a Branch Audit - v1.2.0	POL-0083035
48.	POL00121467	Email from Ruth Robinson To: po_security_community Re: Corporate Security Newsbrief Issue 22	POL-0127730
49.	POL00121485	Email chain from Ruth Robinson To: Po_security_community Re: Corporate Security Newsbrief Issue 28	POL-0127748
50.	POL00129311	Email from Dave Posnett to Helen Dickinson, Andrew Daley, Keith Gilchrist and others. Re:Cartwright Training Day in Birmingham	POL-0135205
51.	POL00158977	Email - Investigation Circular 4 - 2011: Police Bail under the Police and Criminal Evidence Act 1984, Mandatory Reading for all Royal Mail Group Security (Investigations)	POL-0147056
52.	POL00158978	Royal Mail Security Investigation Circular 4-2011: Police Bail under the Police and Criminal Evidence Act 1984	POL-0147057
53.	POL00118096	Email from Andrew Wise to Michael Stanway forwarding an email re Casework Compliance	VIS00012685
54.	POL00118108	Appendix 1 - Case Compliance checklist	VIS00012697

55.	POL00118109	Appendix 2 - File construction and Appendixes A, B and C: "Compliance Guide: Preparation and Layout of Investigation Red Label Case Files"	VIS00012698
56.	POL00118101	Appendix 3 - Offender reports and Discipline reports: "Compliance Guide to the Preparation and Layout of Investigation Red Label Case Files"	VIS00012690
57.	POL00118102	Appendix 4 - Offender reports layout: "POL template Offender Report (Legal Investigation)"	VIS00012691
58.	POL00118103	Appendix 5 - Discipline reports layout: "POL template Offender Report (Personnel Investigation)"	VIS00012692
59.	POL00118104	Appendix 6 - Identification codes	VIS00012693
60.	POL00118105	Appendix 7 - Tape Interviews. "POL Security Operations Team guide: Summarising of Tape Recorded Interviews."	VIS00012694
61.	POL00118106	Appendix 8 - Notebooks: Guidance on using notebooks in investigations.	VIS00012695
62.	POL00118107	Appendix 9 - Case Progression Toolkit.	VIS00012696
63.	POL00122145	Email from Keith Gilchrist to Andrew Wise regarding Crown Office Policy on reporting criminality to Post Office Security	POL-0128388
64.	POL00122150	Email chain from Keith Gilchrist to Rob King, re: Crown Office Policy on reporting criminality to Post Office and Whitehaven	POL-0128393
65.	FUJ00225012	Email from Penny Thomas to Post Office Security re: ARQ 178-181 - Blackpool Road.	POINQ0231127F
66.	POL00121881	Email from Helen Dickinson to Sharon Jennings, Christopher Knight, Glyn Burrows and others re: FW: New process for dealing with Horizon data requests - ARQs	POL-0128140
67.	POL00158388	Internal Loss Procedure, Appendix 2	POL-0146757

68.	POL00044025	Email from Stephen Bradshaw to Paul Williams and John Breeden re case closure - POLTD/1112/0208 - Fazakerley Branch/ Angela Sefton	POL-0040504
69.	POL00046250	Email from Stephen Bradshaw to Paul X Williams and John Breeden re Case Closure Reporting - Khayyam Ishaq	POL-0042729
70.	POL00046635	Report: Case Closure reporting in re to Rowlands castle dated 26/09/2012.	POL-0043114
71.	POL00089081	Branch Audit Report of Winsford Post Office (217401) - Identifying Mark: RC2	POL-0086056
72.	POL00089237	Email from Steve Bradshaw to Glenn Chester re Stakeholder Notification	POL-0086212
73.	POL00089670	POL Record of Taped Interview of Mr Grant Ian Allen	POL-0086645
74.	POL00089671	POL Record of Taped Interview of Mr Grant Ian Allen	POL-0086646
75.	POL00089426	Post Office Ltd: Legal Investigation - Offences report	POL-0086401
76.	POL00089294	Email from Andrew Bolc to Post Office Security, Jamail Singh, Steve Bradshaw and others re Grant Ian ALLEN - Winsford PO POL 1112/0228	POL-0086269
77.	POL00089454	Letter from Andrew Bloc to Post Office Limited Security Team re: POL v Grant Ian Allen Case POLTD/1112/0228	POL-0086429
78.	POL00089057	Post Office Limited Regina v Grant Ian Allen - Charging Advice	POL-0086032
79.	POL00089455	Proposed Charge - (Post Office Ltd v Grant Ian Allen)	POL-0086430
80.	POL00089072	Magistrates Court (Code 1188) - Court correspondence	POL-0086047

81.	POL00089259	Planned Operation Risk Assessment Report for Winsford Post Office Branch - re Grant Allen	POL-0086234
82.	POL00089560	Post Office Limited - Witness Statement of Stephen Bradshaw	POL-0086535
83.	POL00089561	Post Office Limited - Witness Statement of Richard Cross and Andrew Wise	POL-0086536
84.	POL00089346	Post Office Ltd - List of Witnesses in R v Grant Ian Allen	POL-0086321
85.	POL00089351	Post Office Ltd, List of Exhibits in R v Grant Ian Allen	POL-0086326
86.	RLIT0000039	Richard Hawkes & Ors v Post Office Limited [2022] EWCA Crim 1197	RLIT0000039