

Appendix 1

No.	Date received, reference and title	Request
1	<p>06/08/2020</p> <p>Freedom of Information request - Investigations into the integrity of Post Offices Horizon IT.</p>	<p>Two independent reports were conducted, at the behest of Post Office Limited, regarding the allegation of poor error and fraud repellency of Horizon which forensic investigators Second Sight believed their findings evidenced (2012-2015).</p> <p>What was the POL Board advised regarding these counter investigations, by whom were they conducted and when?</p> <p>Please can you make available these reports with respect to the question of Horizon's integrity.</p>
2	<p>07/08/2020</p> <p>Freedom of Information request - Review into Post Office Horizon IT Sept 2015-April 2016</p>	<p>Written evidence submitted by the Department for Business, Energy and Industrial Strategy to the BEIS Select Committee under it's review into the Post Office and Horizon, (published 15th May 2020, Annex B-Factual Timeline, p7) states the following:</p> <p>i) 'August 2015: The Post Office Minister meets with POL to discuss the Complaint Review and Mediation Scheme, Second Sight reports and POL's approach to addressing issues raised about the Horizon system'.</p> <p>Who was present at this meeting? Were any concerns raised at this meeting regarding POL's suspense accounts highlighted in Second Sight's reports or suggestions made to investigate them?</p> <p>ii) 'September 2015:The Post Office Minister commissions POL's new Chair to undertake a review of POL's Horizon system and handling of postmaster issues. Support is provided by a QC'.</p> <p>Who was commissioned to undertake this review?</p> <p>iii) 'April 2016:Preliminary conclusion of the review by the POL Chair finds no systematic problem with the Horizon system. Review halted following legal proceedings lodged against POL by the JFSA'.</p> <p>Please can you advised who authorised this review to be halted, POL's Chair or the Post Office Minister?</p> <p>Please release relevant correspondence between POL and BEIS/UKGI and/or minutes of committee meetings when this review was discussed.</p>

		<p>What was the response of BEIS to findings of the review and what action, if any was taken by POL as a result ?</p> <p>Written evidence cited above can be found at:</p> <p><a href="https://protect-eu.mimecast.com/s/G3XvC7pIMSEnGnkH8UCot?domain=committees.parliament.uk">https://protect-eu.mimecast.com/s/G3XvC7pIMSEnGnkH8UCot?domain=committees.parliament.uk</a></p>
3	<p>10/08/2020</p> <p>Freedom of Information request - Post Offices Application to Recuse the Judge during its Horizon Issues Trial</p>	<p>On 21st March 2019, POL issued an application to recuse Mr Justice Fraser, the High Court Judge presiding over the Group Litigation.</p> <p>On what date did the POL Board and/or GLO Committee take the decision to pursue this course of action? Was a UKGI representative present at the time? Were any more senior departmental representatives present at the meeting, if so please can you identify them. Did POL seek ministerial approval before its application to recuse the Judge?</p> <p>Please release minutes of this meeting.</p> <p>On 9th April 2019, POL delivered an appeal against the Judge's refusal to recuse himself. Which UKGI/BEIS representatives attended the Board/GLO Committee meeting at which this further action was authorised?</p> <p>Please release minutes of this meeting.</p>
4	<p>10/08/2020</p> <p>Freedom of Information request - Post Office's IT Strategy document of July 2016</p>	<p>According to the Horizon Issues Judgement, in July 2016 the POL Board approved an IT Strategy document identifying that 'IT was not fit for purpose, expensive and difficult to change' (p 297, para 953):</p> <p><a href="https://protect-eu.mimecast.com/s/UfTsCgnvyiP4E42TEyvhP?domain=judiciary.uk">https://protect-eu.mimecast.com/s/UfTsCgnvyiP4E42TEyvhP?domain=judiciary.uk</a></p> <p>Please can you disclose if BEIS's UKGI representative was present at the Board meeting at which this was discussed? Was the Chair of the Audit, Risk and Compliance Committee in attendance? Who else was present? Please can you release minutes of this meeting?</p>
5	<p>10/08/2020</p> <p>Freedom of Information request - Post Office's Technology Strategy Update Decision Paper, January 2017</p>	<p>According to the Horizon Issues Judgement, a Technology Strategy Update Decision Paper was issued on 30th January, 2017 (p 297, para 953):</p> <p><a href="https://protect-eu.mimecast.com/s/UfTsCgnvyiP4E42TEyvhP?domain=judiciary.uk">https://protect-eu.mimecast.com/s/UfTsCgnvyiP4E42TEyvhP?domain=judiciary.uk</a></p> <p>The document constitutes an update to a report approved by the POL Board in July 2016 (also referred to in the Judgement, as above). Did the 2017 update document receive Board approval? If so, please can you disclose if BEIS's UKGI representative was present at the Board meeting at which this 2017 Update Paper was approved? Was the Chair of the Audit, Risk and Compliance Committee in attendance? Who else was present? Please can you release minutes of this meeting?</p>

6	<p>10/08/2020</p> <p>Freedom of Information request - Post Offices Suspense Accounts</p>	<p>In her letter of response to the BEIS Select Committee's current inquiry into POL and Horizon (24th June 2020) former POL CEO, Paula Vennells, stated in relation to POL's Suspense Accounts:</p> <p><i>'Since it was a technical financial control issue, I asked the CFO to look into it...I cannot remember how this was resolved' (p 15, para 53).</i></p> <p>i) Did this request of the CEO to her CFO generate a report into POL's Suspense Accounts? If so, please can you release its findings?</p> <p>ii) Were any other investigations into POL's Suspense Accounts conducted after independent Forensic Investigators Second Sight raised concerns over their origins? If so please can you release their findings?</p> <p>iii) Did POL's external auditor ever raise concerns over the unexplained accumulation, scale or origin of POL's Suspense Accounts?</p>
7	<p>10/08/2020</p> <p>Freedom of Information request - Report into the shareholder governance arrangements between POL and its Sponsor Department</p>	<p>A document known as the Wilmington Report is referred to in the NATIONAL AUDIT OFFICE report of February 2005 'Department of Trade and Industry Financial Support of Post Offices' (Ordered by the House of Commons).</p> <p><a href="https://protect-eu.mimecast.com/s/yIP_CmYBki1kykni4UJ0Z?domain=nao.org.uk">https://protect-eu.mimecast.com/s/yIP_CmYBki1kykni4UJ0Z?domain=nao.org.uk</a></p> <p>The remit of the report which was commissioned by the NAO from Wilmington Capital Ltd, is described as:</p> <p><i>' to examine whether the Department's financial monitoring of Post Office Limited is appropriate. Using the private sector as a benchmark, they analysed the shareholding relationship between the Department and Post Office Limited and considered whether the monitoring and corporate governance relationships meet the parties' objectives' (p14).</i></p> <p>i) Please can you advise if a copy of this report is in the possession of the Post Office and if so, please can you release it?</p> <p>ii) Please can you indicate what, if any actions were implemented as a result of its findings regarding the shareholder relationship between POL and its sponsor department (known at that time as the Department of Trade and Industry)?</p>
8	<p>10/08/2020</p> <p>Freedom of Information request - Engagement with lawyers at BEIS</p>	<p>As part of its inquiry into the Post Office and Horizon, the Chair of the BEIS Select Committee asked its former CEO, Paula Vennells, for information concerning the involvement of UKGI officials in discussions about Horizon at Board level. In her letter of response (24th June 2020) Ms Vennells, stated:</p> <p><i>'The UKGI directors were fully engaged in the discussions...The present UKGI incumbent director...was fully engaged on the Board, sub- committee and with ministers and lawyers at BEIS' (p17, para 60 in response to Question 16).</i></p>

		<p>i) Please can you confirm the identity of the law firm who were involved on behalf of BEIS with which the UKGI POL representative was 'fully engaged'.</p> <p>ii) Please can you confirm if a representative from this law firm gave advice or was involved in discussions which led to POL's application to recuse Mr Justice Fraser on 21st March 2019?</p> <p>iii) Please can you confirm if a representative from this law firm gave advice or was involved in discussions which led to POL's appeal against the Judge's refusal to recuse himself delivered by POL on 9th April 2019.</p> <p>iv) Did any lawyer representing the Department for BEIS attend any meetings of the POL GLO sub-Committee from the time of its inauguration in March 2018 until the conclusion of the litigation in December 2019?</p>
9	<p>10/08/2020</p> <p>Freedom of Information request - Post Office's General Counsel</p>	<p>In his letter to the BEIS Select Committee of 16th June 2020, POL CEO Nick Read stated:</p> <p>'Our General Counsel, Ben Foat, was appointed in May 2019, a number of years after the start of the High Court proceedings and had no previous involvement in the Group Litigation'(p6).</p> <p><a href="https://protect-eu.mimecast.com/s/CqxMCKrzgfy02oQikx0Te?domain=committees.parliament.uk">https://protect-eu.mimecast.com/s/CqxMCKrzgfy02oQikx0Te?domain=committees.parliament.uk</a></p> <p>Ben Foat's employment at POL predates the Litigation, dating from 2015. Prior to becoming its General Counsel his responsibilities as Legal Director included legal risk management and drafting legal strategy.</p> <p><a href="https://protect-eu.mimecast.com/s/iSZ4CI2A0HO6R6ZCgwNjK?domain=lawsociety.org.uk">https://protect-eu.mimecast.com/s/iSZ4CI2A0HO6R6ZCgwNjK?domain=lawsociety.org.uk</a></p> <p>i) Did Ben Foat as Legal Director attend any meetings of the POL Board GLO Subcommittee between March 2018 and his appointment as GC in May 2019? Please can you provide relevant minutes.</p> <p>ii) Was Ben Foat as Legal Director personally involved in generating reports for the Board GLO Subcommittee, or for the Group Director of Legal, Risk and Governance with regards to the Group Litigation? Please can you supply relevant documents.</p> <p>Did Ben Foat as Legal Director have direct communications with POL lawyers Womble Bond Dickinson or with lawyers representing BEIS with regards to the Group Litigation prior to May 2019? Please supply relevant documents.</p>
10	<p>10/08/2020</p> <p>Freedom of Information request - Post</p>	<p>In his Horizon Issues Ruling of December 2019, Judge Fraser expressed concern that POL investigations routinely used Credence data, or a variety of management information, to resolve disputes over branch discrepancies rather than consulting the ARQ ('Audit') data:</p>

	Office's Historical Shortfall Scheme	<p>'The evidence in both this trial, and the Common Issues trial, where the Post Office cross-examined a number of SPMs on events in their branch accounts by using a variety of management information, other than the audit data, makes clear to me just how important it is to use the audit data, rather than other sources including management information. The management information is confusing, contradictory, has been shown to be wrong and requires numerous assumptions or a "take it from me" type of approach on the part of a questioner. It is rarely agreed what that management data shows. The audit data, by its very nature, will be far superior and the best evidence available of what has occurred on Horizon. It should be consulted in circumstances where there is a dispute between the Post Office and a SPM.</p> <p>(Horizon Issues Judgement, p285, para 905-913).</p> <p><a href="https://protect-eu.mimecast.com/s/UfTsCgnvyiP4E42TEyvhP?domain=judiciary.uk">https://protect-eu.mimecast.com/s/UfTsCgnvyiP4E42TEyvhP?domain=judiciary.uk</a></p> <p>i) Please can you confirm, in respect of the Historical Shortfall Scheme, whether POL will be consulting ARQ or Credence data supplied by Fujitsu in the course of its investigations?</p> <p>ii) Please can you confirm if POL will identify to every complainant in the scheme which level of data it is using for its evidence?</p>
11	<p>13/08/2020</p> <p>Freedom of Information request - Shareholder meetings between Post Office Limited and the Department for Business, Energy and Industrial Strategy</p>	<p>According to its Shareholder Relationship Framework Document, Post Office Limited is to have regular Shareholder meetings with the Department for BEIS (p27, Appendix 4, 7b).</p> <p><a href="https://protect-eu.mimecast.com/s/alrICkrzgfYgzGji26m1-?domain=assets.publishing.service.gov.uk">https://protect-eu.mimecast.com/s/alrICkrzgfYgzGji26m1-?domain=assets.publishing.service.gov.uk</a></p> <p>i) Please can you reveal how many such meetings have been conducted (including virtually) since the Agreement took effect on 1st April 2020?</p> <p>ii) Please can you release minutes of all Shareholder meetings to date?</p>
12	<p>13/08/2020</p> <p>Freedom of Information request - Post Office's Audit Risk &amp; Compliance Committee and POL's litigation</p>	<p>According to its Terms of Reference, POL's Audit, Risk &amp; Compliance Committee has a duty to review legal matters which may impact on the financial statements of the company.</p> <p>The Group Litigation was first mentioned in the 2015-16 POL Annual Report (p74):</p> <p><a href="https://protect-eu.mimecast.com/s/xe5pCpkGnuQ536WU2vI9z?domain=beta.companieshouse.gov.uk">https://protect-eu.mimecast.com/s/xe5pCpkGnuQ536WU2vI9z?domain=beta.companieshouse.gov.uk</a></p> <p>i) On what date did the ARC Committee first discuss the emerging risk of the Group Litigation as a financial, reputational or strategic risk to POL and was BEIS's UKGI representative Richard Callard present? Please can you release minutes from this meeting?</p>

		<p>ii) How regularly was the progress of the litigation monitored by this committee up until the convening of the GLO Subcommittee in March 2018?</p> <p>iii) Is POL's ARC Committee continuing to keep under review the potential financial/reputational/ strategic posed by POL's anticipated legal activity at the Court of Appeal, its Historical Shortfall Scheme and investigations into over 900 previous SPM prosecutions?</p> <p>iv) Now that the High Court action has been settled, has the POL GLO Subcommittee been superseded by another committee which is overseeing current legal strategy and outcomes? If so, please can you identify its membership?</p>
13	<p>14/08/2020</p> <p>Freedom of Information request - Departmental Representative on Post Offices Audit Risk and Compliance Committee</p>	<p>According to POL's 2012-13 Annual Report, the BIS Departmental Representative, Susannah Storey of the Shared Executive, attended all POL's Audit, Risk and Compliance Committee meetings within this financial year: (POL Annual Report 2012-13, p44).</p> <p><a href="https://protect-eu.mimecast.com/s/VuXzC6BkMSVX5MLfBGq5Q?domain=beta.companieshouse.gov.uk">https://protect-eu.mimecast.com/s/VuXzC6BkMSVX5MLfBGq5Q?domain=beta.companieshouse.gov.uk</a></p> <p>There was no departmental representative on the POL ARC Committee 2013-14: (POL Annual Report 2013-14, p54).</p> <p><a href="https://protect-eu.mimecast.com/s/zClvCZz5giPzJxKUzQ0FZ?domain=beta.companieshouse.gov.uk">https://protect-eu.mimecast.com/s/zClvCZz5giPzJxKUzQ0FZ?domain=beta.companieshouse.gov.uk</a></p> <p>According to the 2015-16 POL Annual Report, the BIS/UKGI representative, Richard Callard, joined POL's ARC Committee part way through the financial year: (POL Annual Report 2015-16, p22 &amp; 25).</p> <p><a href="https://protect-eu.mimecast.com/s/4N52C5RjMfgABRkC8plko?domain=beta.companieshouse.gov.uk">https://protect-eu.mimecast.com/s/4N52C5RjMfgABRkC8plko?domain=beta.companieshouse.gov.uk</a></p> <p>i) Please can you reveal the date of the last ARC Committee meeting attended by Susannah Storey and the date of the first ARC Committee meeting attended by Richard Callard?</p> <p>ii) Please can you supply any documentation regarding the reasons for the departmental representative being withdrawn then re-instated from POL's ARC Committee?</p> <p>iii) Please can you supply documents which show whether these decisions were made by POL, the Department for BIS, the Shared Executive or its successor UKGI?</p>
14	<p>14/08/2020</p> <p>Freedom of Information request - Post Office's Internal Audit</p>	<p>Annual Reports of POL give no indication that its Internal Audit conducted a system audit of Horizon. Only the 2016 Annual Report cites all the audits conducted by POL's Internal Audit which are mainstream, financial services and business transformation: (POL Annual Report 2015-16, p30)</p> <p><a href="https://protect-eu.mimecast.com/s/4N52C5RjMfgABRkC8plko?domain=beta.companieshouse.gov.uk">https://protect-eu.mimecast.com/s/4N52C5RjMfgABRkC8plko?domain=beta.companieshouse.gov.uk</a></p> <p>i) Please can you provide documents to evidence if/when POL's Internal Audit conducted a detailed system audit of Horizon IT itself (as distinct from branch-</p>

		<p>level audits of Horizon users) prior to the Group Litigation Order made in March 2017?</p> <p>ii) Please can you confirm if the Royal Mail Internal Audit, on whom POL relied prior to 2013, conducted a detailed system audit of Horizon?</p> <p>iii) Please can you confirm if POL's Internal Audit had technical auditors competent and qualified to perform detailed system audits from the time of its inception following POL's split from Royal Mail?</p> <p>(Please detail relevant professional qualifications).</p> <p>iv) Has POL's Audit, Risk and Compliance Committee ever raise concerns regarding the technical expertise of POL's Internal Audit?</p>
15	<p>14/08/2020</p> <p>Freedom of Information request - Post Office's Internal Audit and outsourcing arrangements</p>	<p>The POL Annual Report of 2013-14 explains how a new POL Internal Audit Department was established after the summer of 2013 following the split from Royal Mail (having previously relied upon Royal Mail Internal Audit). POL's Internal Audit is described as a small team supported by co-sourcing arrangements with a major firm:</p> <p>(POL Annual Report 2013-14, p54):</p> <p><a href="https://protect-eu.mimecast.com/s/zClvCZz5giPzJxKUzQ0FZ?domain=beta.companieshouse.gov.uk">https://protect-eu.mimecast.com/s/zClvCZz5giPzJxKUzQ0FZ?domain=beta.companieshouse.gov.uk</a></p> <p>i) Please can you confirm if these co-sourcing arrangements covered IT audits?</p> <p>ii) If so, did the external suppliers perform any system audit of Horizon and can you provide the results of any such audit?</p>
16	<p>17/08/2020</p> <p>Freedom of Information request - Ministerial UKGI engagement with Post Office directors and officials with regard to POLs Historical Shortfall Scheme</p>	<p>On how many occasions has a BEIS Minister and/or UKGI representative for the Department met with POL directors or officials to discuss the establishment of POL's Historical Shortfall Scheme?</p> <p>ii) Please can you provide minutes of relevant meetings?</p>
17	<p>17/08/2020</p> <p>Freedom of Information request - Ministerial engagement and POLs response to the the Criminal Case Review Commission</p>	<p>i) On how many occasions since the Ruling of the Horizon Issues Trial was handed down on 16th December 2019 has a BEIS Minister and/or UKGI representative for the Department met with POL directors or officials and discussed the referrals of Horizon cases by the Criminal Case Review Commission to the Court of Appeal?</p> <p>ii) Please can you provide minutes of relevant meetings?</p>

18	<p>17/08/2020</p> <p>Freedom of Information request - Ministerial UKGI engagement with Post Office directors and officials with regard to POLs Investigations into over 900 historical prosecutions</p>	<p>i) On how many occasions has a BEIS Minister and/or UKGI representative for the Department met with POL directors or officials to discuss investigations into more than 900 historical prosecutions secured on the basis of potentially unreliable Horizon data?</p> <p>ii) Please can you provide minutes of relevant meetings?</p>
19	<p>17/08/2020</p> <p>Freedom of Information request - HORice Increasing Horizons Error Repellency</p>	<p>In her letter of response to the BEIS Select Committee's current inquiry into POL and Horizon (24th June 2020) former POL CEO, Paula Vennells, stated in relation to the cessation of branch suspense accounts:</p> <p>'The suspense account issue relates to the procedures around disputed shortfalls...this was an area where Post Office needed to improve, both in terms of preventing disputes from arising in the first instance, and of dealing with all and especially complex disputes effectively when they arose. One improvement we made in the first category was the introduction of technology, called HORice, which could help identify anomalies before they escalated into large losses' (p6, para 12 &amp; p8, para 22).</p> <p>i) Please can you confirm if 'large losses' which the HORice technology was intended to mitigate against, were in branch accounts?</p> <p>ii) When was this technology introduced?</p> <p>iii) Please can you release documentation which monitored the impact of HORice on reducing the incidence and size of 'large losses', comparing rates before and after its implementation?</p> <p>(Paula Vennells' letter can be found at:  <a href="https://protect-eu.mimecast.com/s/MOOICJNL1CpLrpvcGcUak?domain=committees.parliament.uk/">https://protect-eu.mimecast.com/s/MOOICJNL1CpLrpvcGcUak?domain=committees.parliament.uk/</a> )</p>
20	<p>17/08/2020</p> <p>Freedom of Information request - Shareholder Permission for costs in POLs Horizon Litigation</p>	<p>On 23rd May 2019 Judge Fraser ordered POL to pay £5.5m to the Claimants for costs incurred during the Common Issues Trial (transcript below). POL's QC, Mr Cavendar sought a 14 day extension to the payment deadline explaining: 'It is a question of arranging the funds I suppose and talking to our shareholder about it'.</p> <p>i) Please can you release documents between POL and the Department for BEIS and/or between POL and UKGI regarding the authorisation of this payment from the shareholder?</p>

		<p>ii) What was the agreed threshold beyond which POL was bound to consult its shareholder before releasing funds to Claimants as part of the Horizon Litigation? Please can you release documentation in which such limits were specified?</p> <p>On 11th December 2019 mediation between POL and the GLO Claimants concluded with a £57.75m settlement awarded to the Claimants.</p> <p>iii) Please can you release documents detailing communications between POL and the Department for BEIS and/or documents detailing communications between POL and UKGI which authorised this payment?</p> <p><a href="https://protect-eu.mimecast.com/s/7O0GCOPQGC5rR5jSA2wLI?domain=postofficetrial.com">https://protect-eu.mimecast.com/s/7O0GCOPQGC5rR5jSA2wLI?domain=postofficetrial.com</a></p>
21	<p>17/08/2020</p> <p>Freedom of Information request - Communications from POL updating BEIS of its change in legal strategy March 2019</p>	<p>On 6th July 2020 in a written response to Lord Arbuthnot, BEIS's Parliamentary Under-Secretary, Lord Callanan made the following comment:</p> <p>'Following the Common Issues Judgment in March 2019, POL advised Ministers that it intended to change its approach to the litigation. This included changes to the POL legal team and strategy...'</p> <p><a href="https://protect-eu.mimecast.com/s/ZeCsCQ6VXiB4ABpcGACTw?domain=theyworkforyou.com">https://protect-eu.mimecast.com/s/ZeCsCQ6VXiB4ABpcGACTw?domain=theyworkforyou.com</a></p> <p>i) Please can you release correspondence and/or minutes of meetings in which POL advised the Department for BEIS and/or its UKGI representatives of the aforesaid change in legal strategy after the Common Issues Judgement of March 2019?</p> <p>ii) Please can you release correspondence and/or minutes of meetings in which the Department for BEIS and/or its UKGI representative responded to POL's information regarding the change in its legal team and strategy as a result of the Common Issues Judgement?</p>
22	<p>17/08/2020</p> <p>Freedom of Information request - Horizon and Privileged User Access</p>	<p>In her letter of 24th June to the BEIS Select Committee ex-POL CEO Paula Vennells refers to remedial actions taken by POL in response to the 2011 Ernst &amp; Young management letter which had exposed weaknesses in the control and security procedures around Horizon. She maintains 'improvements to controls' and 'focused management action' resulted in an 'ultimately positive outcome' as E&amp;Y audits of 2012 and 2013 'made less significant recommendations for further improvements' (Link, p12, para 40).</p> <p><a href="https://protect-eu.mimecast.com/s/MOOICJNL1CpLrpvcGcUak?domain=committees.parliament.uk">https://protect-eu.mimecast.com/s/MOOICJNL1CpLrpvcGcUak?domain=committees.parliament.uk</a></p> <p>In the Horizon Issues Judgement, however, Judge Fraser is clear that Privileged User Access logs were not adequately maintained until 2015 which he considers '...a serious deficiency both in the required level of controls in Horizon, in the recording of what privileged users were actually doing...and also a corresponding absence of recording and auditing those activities'</p> <p>(Horizon Issues Judgement p218, para 692-694, p118, para 393-394).</p> <p><a href="https://protect-eu.mimecast.com/s/NtIOCKLMGt8xE8Nc365Ly?domain=judiciary.uk">https://protect-eu.mimecast.com/s/NtIOCKLMGt8xE8Nc365Ly?domain=judiciary.uk</a></p>

		<p>i) Please can POL release relevant passages of the E&amp;Y SAS70 audit reports and/or management letters of 2012, 2013 and 2014 which address ongoing weaknesses in the control and security procedures around Horizon.</p> <p>ii) Please can you confirm if these audits reports and/or management letters were considered by POL's Audit, Risk and Compliance Committee and if so please supply minutes of the relevant meetings identifying all attendees.</p>
23	<p>17/08/2020</p> <p>Freedom of Information request - Horizons Dalmellington bug</p>	<p>The Dalmellington bug lay undiscovered in Horizon though its effects were apparent from 2010-2015.</p> <p>(Horizon Issues Judgement p136, para 447-449</p> <p><a href="https://protect-eu.mimecast.com/s/NtIOCKLMGt8xE8Nc365Ly?domain=judiciary.uk">https://protect-eu.mimecast.com/s/NtIOCKLMGt8xE8Nc365Ly?domain=judiciary.uk</a> and Horizon Issues Technical Appendix p 42-44, para 163-171).</p> <p><a href="https://protect-eu.mimecast.com/s/S08YCPzRGivAGvRSZ8ZM_?domain=judiciary.uk">https://protect-eu.mimecast.com/s/S08YCPzRGivAGvRSZ8ZM_?domain=judiciary.uk</a></p> <p>In December 2015 an investigation by Fujitsu- prompted by the impact of this bug at a post office branch- revealed it had caused 112 incidents since 2010. A confidential briefing arising from this investigation was given to POL.</p> <p>i) Please can you confirm if this report was presented to POL's Audit Risk and Compliance Committee?</p> <p>ii) If so please can you provide relevant minutes detailing all attendees when it was discussed.</p> <p>iii) Please can you release this report?</p>
24	<p>18/08/2020</p> <p>Freedom of Information request - Letter to the Chair of POL from the Shareholder</p>	<p>According to the Shareholder Relationship Framework Document between BEIS/UKGI and POL implemented on April 1st 2020:</p> <p>'2.3 The Shareholder may also issue a periodic Chair Letter (the "Chair Letter")' (p 6) <a href="https://protect-eu.mimecast.com/s/jxjTCPzRGivyLIVTzgxg2?domain=assets.publishing.service.gov.uk">https://protect-eu.mimecast.com/s/jxjTCPzRGivyLIVTzgxg2?domain=assets.publishing.service.gov.uk</a></p> <p>Please can you determine whether such a Chair Letter has been received by POL from the Department for BEIS and if so please can you reveal its contents?</p>
25	<p>18/08/2020</p> <p>Freedom of Information request - Post Office's legal costs and reporting intervals to BEIS/UKGI</p>	<p>During its High Court Horizon Litigation, Judge Fraser originally asked POL to report its legal costs to the Court at £250k intervals, but POL costs rose so rapidly he had to adjust the reporting interval to £500k:</p> <p><a href="https://protect-eu.mimecast.com/s/QAJvCXr3PfBpLJrT9KaBa?domain=lawgazette.co.uk">https://protect-eu.mimecast.com/s/QAJvCXr3PfBpLJrT9KaBa?domain=lawgazette.co.uk</a></p> <p>At what intervals was it decided that POL would report its legal costs to BEIS/UKGI and was this reporting interval ever adjusted to accommodate the high rate of expenditure?</p>

26	<p>18/08/2020</p> <p>Freedom of Information request - Post Office's Group Plans, the impact of its High Court Litigation and ongoing claims related to Horizon</p>	<p>According to the Shareholder Relationship Framework Document between BEIS/UKGI and POL implemented on April 1st 2020 POL must produce an Annual Business Plan and a three year Strategic Plan</p> <p>to include:</p> <p>'high level financial and performance projections, at both the corporate and line-of-business level, with sensitivity analyses of the major risks...' (p 7-9)</p> <p><a href="https://protect-eu.mimecast.com/s/jxjTCPzRGivyLIVTzgxg2?domain=assets.publishing.service.gov.uk">https://protect-eu.mimecast.com/s/jxjTCPzRGivyLIVTzgxg2?domain=assets.publishing.service.gov.uk</a></p> <p>i) What provision has been made in these plans for the ongoing costs relating to POL's Horizon issues, namely the 47 cases referred by the Criminal Case Review Commission to the Court of Appeal, the 1800 applicants to the Historical Shortfall Scheme and the 900 plus historic sub-postmaster prosecutions POL is currently investigating?</p> <p>ii) Have these plans been informed by an Audit, Risk and Compliance Committee Report on the potential scale of risk of the above factors to the financial position of POL?</p>
27	<p>18/08/2020</p> <p>Freedom of Information request - Relevant Issues</p>	<p>According to the Shareholder Relationship Framework Document between BEIS/UKGI and POL implemented on April 1st 2020, POL's Board is bound to inform the Department prior to taking any final decision on a Relevant Issue which is defined as:</p> <p>'an issue which may have a material adverse effect upon the business or financial prospects of the Group or any Group Company' and/or 'regulatory matters, such as any Group Company being referred for regulatory investigation by a relevant regulatory authority' (p18)</p> <p><a href="https://protect-eu.mimecast.com/s/jxjTCPzRGivyLIVTzgxg2?domain=assets.publishing.service.gov.uk">https://protect-eu.mimecast.com/s/jxjTCPzRGivyLIVTzgxg2?domain=assets.publishing.service.gov.uk</a></p> <p>Please can you confirm if the activities of POL with regard to the list below are considered by the Board to be Relevant Issues and therefore subject to reporting to the Shareholder prior to a final decision being taken?</p> <p>i) 47 cases referred by the Criminal Case Review Commission to the Court of Appeal,</p> <p>ii) 1800 applicants to the Historical Shortfall Scheme,</p> <p>iii) 900 plus historic sub-postmaster prosecutions POL is currently investigating</p>
28	<p>19/08/2020</p> <p>Freedom of Information request - Ministerial</p>	<p>According to Kelly Tolhurst, replying to Kevan Jones's parliamentary question 246965 of 24th April 2019:</p> <p>'Ministers have met with directors and officials of the Post Office four times in the last 12 months to discuss a number of topics including the ongoing group litigation' (8th May 2019).</p>

	<p>engagement with POL directors and officials</p>	<p>Ms Tolhurst's answer to Kevan Jones's follow-up question of 6th June 2019 discloses that she and her predecessor Andrew Griffiths MP, were Ministers in attendance along with POL's Chair, CEO, CFO and executive director covering Legal Affairs.</p> <p>i) Please can you release minutes of these four meetings?</p> <p>ii) Please can you disclose on how many occasions a Minister from BEIS has met with POL directors and officials since 8th May 2019?</p> <p>(See MP: Mr Kevan Jones - Written Questions to Department for Business, Energy and Industrial Strategy):</p> <p><a href="https://protect-eu.mimecast.com/s/C3aCCE0Dyi1M9X9uQovSh?domain=parallelparliament.co.uk">https://protect-eu.mimecast.com/s/C3aCCE0Dyi1M9X9uQovSh?domain=parallelparliament.co.uk</a></p>
<p>29</p>	<p>19/08/2020</p> <p>Freedom of Information request - POL Board meeting March 2019 and two-day Strategy meeting 26-27th June 2018</p>	<p>In her reply to MP Kevan Jones' parliamentary question on 6th June 2019, BEIS Postal Minister Kelly Tolhurst makes reference to a pre-Board dinner on 25th March 2019 attended by the department's UKGI representative Tom Cooper (see link below).</p> <p>i) Please can you provide a list of all attendees at the subsequent POL Board meeting on 25th March 2019?</p> <p>ii) Please can you confirm if POL's Recusal Application submitted to the High Court 4 days previously was discussed at this Board Meeting?</p> <p>iii) Please can you release minutes of this Board meeting?</p> <p>iv) On what date did the POL Board approve the decision to Recuse Justice Fraser?</p> <p>In her reply to Kevan Jones MP, Kelly Tolhurst also makes reference to a two-day strategy meeting 26-27 June 2018 attended by a member of UKGI in lieu of Tom Cooper.</p> <p>iv) Please can you identify who the UKGI representative was who attended in lieu of Tom Cooper and if this two-day meeting included on its agenda legal strategy with regards to the Group Litigation?</p> <p>(see below, MP: Mr Kevan Jones - Written Questions to Department for Business, Energy and Industrial Strategy):</p> <p><a href="https://protect-eu.mimecast.com/s/C3aCCE0Dyi1M9X9uQovSh?domain=parallelparliament.co.uk">https://protect-eu.mimecast.com/s/C3aCCE0Dyi1M9X9uQovSh?domain=parallelparliament.co.uk</a></p>

30	19/08/2020  Freedom of Information request - Michael Keegan, former employee of Post Office Limited	<p>On 15th May 2014, Fujitsu announced the appointment of Michael Keegan as Head of its UK and Ireland activities (see below). The article notes that prior to joining Fujitsu, Mr Keegan's experience in the IT sector 'included holding senior leadership roles at the Royal Mail Group/Post Office Ltd'.</p> <p>Please can you identify the senior leadership roles held by Michael Keegan at POL along with relevant dates?</p> <p><a href="https://protect-eu.mimecast.com/s/jdXHCGMGASWGYXys1nM3b?domain=fujitsu.com">https://protect-eu.mimecast.com/s/jdXHCGMGASWGYXys1nM3b?domain=fujitsu.com</a></p>
31	19/08/2020  Freedom of Information request - Shareholder Meeting at POL	<p>According to the Shareholder Relationship Framework Document between BEIS/UKGI and POL implemented on April 1st 2020, there must be a Shareholder meeting at least twice per annum attended by the Shareholder NED, Shareholder representative at Executive Level, Policy Sponsor and Policy Champion (p11).</p> <p>i) Please can you advise if such a Shareholder meeting has been convened, if so, how many times and who attended?</p> <p>ii) Please can you release minutes of the meeting?</p> <p><a href="https://protect-eu.mimecast.com/s/99e_Cy9Rzc6kXVXsZz9f7?domain=assets.publishing.service.gov.uk">https://protect-eu.mimecast.com/s/99e_Cy9Rzc6kXVXsZz9f7?domain=assets.publishing.service.gov.uk</a></p>
32	19/08/2020  Freedom of Information request - POL Auditors	<p>Please can you identify how many Post Office Limited auditors responsible for conducting audits at branch level have been investigated, faced disciplinary action or have removed from duty as a result of irregularities in branch audits?</p> <p>Please provide numbers per annum since the rollout of Horizon in 1999.</p>
33	20/08/2020  Fujitsu Assurances regarding Horizon and remote access	<p>In written evidence to the BIS Select Committee Inquiry of 2015, POL gave the following assurance:</p> <p>'There is no functionality in Horizon for either a branch, Post Office or Fujitsu (suppliers of the Horizon system) to edit, manipulate or remove transaction data once it has been recorded in a branch's accounts' (point 47).</p> <p><a href="http://data.parliament.uk/writtenevidenc...">http://data.parliament.uk/writtenevidenc...</a></p> <p>The stance on remote access of that time is recalled by ex POL CEO Paula Vennells in her letter of response to the BEIS Select Committee's 2020 Inquiry into POL and Horizon:</p> <p>'I raised this question repeatedly, both internally and with Fujitsu, and was always given the same answer: that it was not possible for branch records to be altered remotely without the sub-postmaster's knowledge'.</p>

		<p>Please can you supply communications and/or audit reports from Fujitsu in which Fujitsu gives assurance that branch accounts could not be remotely accessed without an SPM's knowledge and on which POL's based the assurances it gave to MPs?</p> <p>(Below, letter from Paula Vennells to BEIS Select Committee of 24th June 2020, p16, point 54):</p> <p><a href="https://committees.parliament.uk/publica...">https://committees.parliament.uk/publica...</a></p>
34	<p>24/08/2020</p> <p>Freedom of Information request - Temporary Branch Closures as of 31st March 2020</p>	<p>In a letter to Marion Fellows MP of 8th June 2020, Post Office CEO Nick Read reveals a total of 1199 temporary branch closures across the network at 31st March 2020. This figure is exclusive of branches impacted by Covid-19.</p> <p>i) Please can you reveal how many of the 1199 closures were triggered by irregularities in branch accounts following POL audits?</p> <p>li) Of any closures due irregularities in branch accounts, how many sub-postmasters:</p> <p>a) were suspended?</p> <p>b) have been re-instated?</p> <p>c) had their contracts terminated?</p> <p>(Letter in Hansard Deposited Paper's):</p> <p><a href="https://protect-eu.mimecast.com/s/s8hyCV71Wi0DjAplQ4vGW?domain=data.parliament.uk">https://protect-eu.mimecast.com/s/s8hyCV71Wi0DjAplQ4vGW?domain=data.parliament.uk</a></p>
35	<p>24/08/2020</p> <p>Freedom of Information request - Post Office branches in McColls Stores</p>	<p>i) How many SPMs who ran Post Office branches located in McColls stores have been suspended and/or terminated as a result of unexplained discrepancies in branch accounts discovered by POL audit since 1999?</p> <p>ii) How many Post Office branches in McColls stores have been temporarily closed due to unexplained discrepancies in branch accounts found by POL audit since 1999?</p> <p>ii) How many shortfalls discovered by POL audit in branch accounts at McColls have been in excess of £1,000 since the rollout of Horizon in 1999?</p>
36	<p>24/08/2020</p> <p>Freedom of Information</p>	<p>i) Please can you release all versions of POL Audit, Risk and Compliance Committee Terms of Reference since April 1st 2012 including dates of when each version was in use.</p>

	request - POL Audit, Risk and Compliance Committee Terms of Reference	ii) Please can you release Audit, Risk and Compliance Committee (or equivalent) Terms of Reference from the period prior to POL's split from Royal Mail. Please include all versions implemented since 1995 when Post Office Limited (then Post Office Counters) was operated as a subsidiary of The Post Office, and subsequently as a subsidiary of Consignia and Royal Mail Holdings.
37	24/08/2020  Freedom of Information request - Post Office Limited's Historical Shortfall Scheme	ii) Is Post Office's Historical Shortfall Scheme open to sub-postmasters who operated or continue to operate Post Office branches in WH Smith, Coop, Tesco, Londis, Budgens, Premier or Bargain Booze?  ii) How many applicants have been turned away from the Historical Shortfall Scheme on account of them working or having worked at a post office branch located in a McColls store?
38	24/08/2020  Freedom of Information request - Ernst and Young Management Letters up to 2011	Reference was made in the Horizon Issues Judgement of December 2019 to Management Letters from Ernst and Young. The earliest to be cited is that of 2011 which states:  'Within the IT environment our audit work has AGAIN identified weaknesses mainly relating to the control environment operated by POL's third party IT suppliers' [emphasis added], (p101, para 394):  <a href="https://protect-eu.mimecast.com/s/iBp0CngDltIWwqrs9KsKX?domain=judiciary.uk">https://protect-eu.mimecast.com/s/iBp0CngDltIWwqrs9KsKX?domain=judiciary.uk</a>  i) Please can you confirm how many previous Ernst and Young Management Letters highlighted weaknesses in POL's IT control environment including unaudited Privileged User Access at POL's third party IT suppliers?  ii) What is the date of the earliest Ernst and Young audit to raise such concerns?  iii) To which individuals and/or committees were these Ernst and Young Management Letters circulated?
39	24/08/2020  Freedom of Information request - Post Office response to Ernst and Young audit 2013	The Horizon Issues Judgement of December 2019 refers to a POL Risk Compliance Committee meeting of 18th September 2013 which noted some of the risks highlighted by the recent Ernst and Young audit as having been addressed (p247, para 791):  <a href="https://protect-eu.mimecast.com/s/iBp0CngDltIWwqrs9KsKX?domain=judiciary.uk">https://protect-eu.mimecast.com/s/iBp0CngDltIWwqrs9KsKX?domain=judiciary.uk</a>  i) Please can you identify who was present at this meeting and release its minutes?  ii) Please can you release the names of attendees and minutes of the contemporaneous 2013 POL Audit, Risk and Compliance Committee meeting in which the findings of the same recent Ernst and Young audit were considered?