

**COMPLAINT TO THE PARLIAMENTARY AND HEALTH SERVICE OMBUDSMAN
(THE “OMBUDSMAN”)
SUBMITTED ON BEHALF OF THE JUSTICE FOR SUBPOSTMASTERS ALLIANCE
(THE “JFSA”)**

INDEX OF DOCUMENTS PROVIDED TO THE OMBUDSMAN

No.	Complaint Reference			Document
	Section	Footnote	Table	
1.	1.1	1		<i>Bates v Post Office Judgment (No.3) “Common Issues”</i> [2019] EWHC 606 (QB)
2.	1.1	1		<i>Bates v Post Office Judgment (No.6) “Horizon Issues”</i> [2019] EWHC 3408606 (QB)
3.	1.2	2		Performance and Innovation Unit Report in 2000 “ <i>Counter Revolution – Modernising the Post Office Network</i> ”
4.	1.2	2		BEIS’s Report in 2020 “ <i>Securing the Post Office Network in the Digital Age</i> ”
5.	1.12	6		The Parliamentary and Health Service Ombudsman’s “Principles for Remedy, CPG2 - Appendix 3”
6.	2.7.2	9		Written Evidence from the Criminal Cases Review Commission
7.	3.4	11		DTI Report in 1999 “ <i>Post Office Reform: A World class service for the 21st century</i> ”
8.	3.14	13		BEIS Report in 2012 “ <i>Building a Mutual Post Office – The Government’s Response</i> ”
9.	3.17			POL Articles of Association adopted in 2002
10.	3.17			POL Articles of Association adopted in 2013
11.	3.29			POL’s Board’s Terms of Reference in 2013
12.	3.33			POL Annual Report & Financial Statements 2012/2013
13.	3.33			POL Annual Report & Financial Statements 2013/2014
14.	3.33			POL Annual Report & Financial Statements 2014/2015
15.	3.33			POL Annual Report & Financial Statements 2015/2016
16.	3.33			POL Annual Report & Financial Statements 2016/2017
17.	3.33			POL Annual Report & Financial Statements 2017/2018
18.	3.33			POL Annual Report & Financial Statements 2018/2019
19.	3.50			ShEx Annual Review 2013/14

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	Section	Footnote	Table	
20.	3.65	19		BEIS Accounting Officer Statement 2018
21.	3.66			BEIS Annual Report & Accounts 2015/16
22.	3.67			Letter from BEIS PAO (Alex Chisolm) to POL dated 3 January 2019
23.	3.67	20		Letter from POL CEO Paula Vennells to Alex Chisolm dated 8 January 2019
24.	3.85.1			Ernst & Young Management Letter for the year ended 27 March 2011
25.	3.85.3			Detica Report in 2013 <i>"Fraud and Non-conformance in the Post Office; Challenges and Recommendations"</i>
26.	3.85.4			Second Sight Report in 2013 <i>"Interim Report into alleged problems with the Horizon system"</i>
27.	3.87			BEIS and UKGI Memorandum of Understanding dated 12 December 2019
28.	4.3		2	Technical Expert Report of Charles Alastair McLachlan, Amsphere Consulting prepared for Seema Misra's court case
29.	4.11.3	36		Letter from Mr Justice Fraser to Mr Max Hill QC, Director of Public Prosecutions dated 14 January 2020
30.	5.3.2(b)	50		House of Commons Justice Committee Ninth Report of Session 2019 – 21 <i>"Private prosecutions: safeguards"</i>
31.	5.3.2(c)	51		Minutes of POL's Board's meeting on 16 July 2013
32.	5.4		1	Letter from POL CEO Paula Vennells to Mike Weir dated December 2011
33.	5.4		2	POL Freedom of Information response dated 21 September 2019
34.	5.4		2	Second Sight Report in 2015 <i>"Initial Complaint Review and Mediation Scheme – Briefing Report Part Two"</i>
35.	5.4		4	POL's written response to Second Sight's <i>"Initial Complaint Review and Mediation Scheme – Briefing Report Part Two"</i>
36.	5.4		4	Minutes of POL's "Project Sparrow" sub-committee meeting on 18 September 2013 (redacted by POL)
37.	5.4		4	Letter from Paula Vennells to Darren Jones MP dated 24 June 2020
38.	6.2			Letter from Lord Callanan to Lord Arbuthnot dated 24 March 2020
39.	6.4.1			BEIS Accounting Officer System Statement 2018
40.	6.4.3			POL Shareholder Relationship Framework Document 2020
41.	6.11	53		Letter from Darren Jones MP to Paul Scully MP dated 16 June 2020

INDEX OF SOURCES REFERENCED BUT NOT PROVIDED TO THE OMBUDSMAN

No.	Complaint Reference			Document Referenced
	Section	Footnote	Table	
1.	2.1	8		Group Litigation Order dated 21 March 2017
2.	5.4		2	Various written correspondence in relation to the Horizon scandal from 2010 onwards between BEIS, MPs and the JFSA