

## GRM01 Disclosure Statistics

The information sought by the review team is:

*“... a definitive statistical position on the disclosure exercise on GRM01, by which I mean e.g. number of documents received into GRM01 for review on relevance and disclosure, number of custodians, number of documents/pages Tier 1 reviewed, number of documents/pages Tier 2 reviewed, number of documents etc quality assured, number of documents scheduled in non-sensitive unused schedules (initial and updated schedules), number of documents/pages actually disclosed to the defence from start to finish, and the number and dates of disclosure tranches in which disclosure was made, number of disclosure reviewers who worked on GRM01 from start to finish, and any other interesting statistics that will give the reader of our report an overview of the size and weight of the disclosure exercise.”*

From the information provided by DRS I have attempted to present as definitive a statistical position as possible. A complicating factor is that GRM02 shares the GRM01 DRS platform and as an ongoing case, continues to obtain material. Where the figures below are for the GRM01 DRS platform as a whole, the figures are from March 2021 ie the figures at the time of trial. The other figures provided do not include documents from custodians relevant only to GRM02.

It is not possible to provide figures for the number of pages and unless indicated otherwise, all figures are for the number of documents.

1. Number of documents released on to GRM01 DRS platform for review (as at 11/03/21):  
**6,350,615**

2. Number of documents on the GRM01 DRS platform for the three main custodians relevant to GRM01 - Serco, MoJ and Deloitte:

MoJ – **1,084,716**

Serco – **1,017,799**

Deloitte – **101,514**

3. Number of custodians relevant to GRM01 (ie excluding those relevant only to GRM02):  
**51**

4. Number of documents that have a determination on either the tier 1 or tier 2 on the GRM01 Disclosure Review Panel:  
**1,899,730**

(This figure best represents the total number of documents reviewed on GRM01 – namely, those that had a reviewer determination applied. The figure was the basis for the reference to ‘approximately 1.9m documents’ that was used in our note to the court dated 22 April 2021 which was also stated in court on that day. This figure was subsequently misquoted by the trial judge as ‘1.3m’ in her ruling terminating the case.)

5. Number of documents that have a determination at tier 1 on the GRM01 Disclosure Review Panel:  
**1,897,641**

6. Number of documents that have a determination at tier 2 on the GRM01 Disclosure Review Panel:  
**41,540**
7. Given the lack of record keeping around quality assurance, I cannot provide a definitive figure for the total of documents that were subject to some form of quality assurance. The only recorded systematic quality assurance process concerned a total of **6,415** documents.
8. Number of items on the schedules and digital sub-schedules that made up the non-sensitive unused schedule:

Total: **110,880**

This is made up as follows:

Bag level schedule – **923**

Serco digital sub-schedule – **58,187**

MoJ and NAO digital sub-schedule – **47,010**

Deloitte digital sub-schedule – **1,129**

SFO Case Drive sub-schedule – **3,631**

9. There were approximately **45** occasions where material and/or updated schedules were served on the defence. Most were as a result of continuing disclosure in response to issues raised. The main tranches were on the following dates:

**21/02/2020** – First tranche

**04/03/2020** – Second tranche

**08/04/2020** – Bag level

**06/05/2020** – Fourth tranche

**01/07/2020** - Initial disclosure

**30/10/2020** – Stage 3 part 1

**06/11/2020** – Stage 3 part 2

10. Number of documents disclosed to the defence:

From DRS – **24,388**

Bag level – **179**

SFO case file and expert documents – **1,013**

Total: **25,580**

Nb. The above figure for DRS does not include documents that were disclosed shortly before and during trial where the DRS records were not updated. There were approximately 600 further documents disclosed during this period so the total DRS figure should be **approximately 25,000** and the overall total **approximately 26,200**.

11. Number of reviewers:

**67 reviewers** have entered determinations on DRS, including case team members who conducted reviews of specific areas or assisted in the review. The vast bulk of the review however was conducted by the team of review counsel. The total number of review counsel instructed was **15**. The size of the team however fluctuated throughout the review, peaking

at **9 reviewers** which was the number during the main period of the review (not all of whom were full time).

**16 February 2022**