

Witness: Rodric David Alun Williams  
Statement Number: WITN08420100  
Exhibits: None  
Date: 11 March 2024

## POST OFFICE HORIZON IT INQUIRY

---

### FIRST WITNESS STATEMENT OF RODRIC DAVID ALUN WILLIAMS

---

I, RODRIC DAVID ALUN WILLIAMS, will say as follows:

#### INTRODUCTION

1. I am an employee of Post Office Limited ("**POL**"), where I am currently a Head of Legal in POL's Remediation Unit. I have been in this role since around August 2020 when POL established the "Historical Matters" (now called "Remediation") Unit to address Postmasters' ("**PMRs**") complaints about Horizon following the conclusion of the *Bates & Others v Post Office Ltd* Group Litigation (the "**Group Litigation**"). I describe the previous roles I have held at POL in the 'Background' section of this witness statement below.
2. This witness statement is made to assist the Post Office Horizon IT Inquiry (the "**Inquiry**") with the matters set out in the Rule 9 Request sent to me dated 5 December 2023 (the "**Request**"). I instructed a firm of solicitors to support me in my preparation of this witness statement. Most of this statement is within my own knowledge and I believe that the facts stated are true. Where I have

Witness: Rodric David Alun Williams  
Statement Number: WITN08420100  
Exhibits: None  
Date: 11 March 2024

derived information from other sources, I say so, and that information is true to the best of my knowledge and belief.

3. I take this opportunity to personally acknowledge and express my deep regret for the significant harm caused to so many individuals by the events the Inquiry was established to review. I recognise that everyone who has played a role in those events has a responsibility to assist this process. I hope that by giving my evidence and answering the Inquiry's questions to the best of my recollection, I can help the Inquiry to deliver on its Terms of Reference, to establish how these events happened, and to help those affected find closure.
4. In a number of parts of the Request, the Inquiry has asked me to explain the steps POL took in relation to particular issues. This statement is my evidence as an individual, based on my own awareness, and I am not speaking for POL or its corporate position. Nothing in this statement is intended to waive POL's legal professional privilege, and I am not authorised to do so. I understand from my solicitors that any legal professional privilege that attached to documents provided to me in connection with this witness statement has been waived, and although I am not party to the precise details of that waiver, I have sought to proceed on the basis that privilege has been waived in accordance with the POL 15 November 2021 response to the Inquiry's request to waive privilege.<sup>1</sup>
5. I have been given a bundle of documents that were provided to my solicitors by the Inquiry, marked with unique reference numbers. I will refer to documents in that bundle below. I have had some opportunity to refresh my recollection from other documentation, such as material held by my employer POL that is

---

<sup>1</sup> See Response on behalf of Post Office Limited 'Legal Professional Privilege' dated 15 November 2021



Witness: Rodric David Alun Williams  
Statement Number: WITN08420100  
Exhibits: None  
Date: 11 March 2024

relevant to these events. As a current POL employee, I have also had access to my POL email inbox to assist me in contextualising that documentation. I have mainly relied on what has been provided by the Inquiry as I have not had the opportunity to undertake a detailed or comprehensive review of other material available to me.

6. The focus of this statement covers a lengthy period going back to 2012, with significant emphasis on matters which took place not long after I joined POL in August 2012. Certain issues raised by the Inquiry came up more than once and at different times during this period, and my understanding of many of them evolved over that time. I have found it difficult to distinguish the state of my knowledge at any given time from what I may have learned later. The documents I have seen have helped to remind me of some things, but there is much that I cannot remember with certainty. I have also had a relatively limited time to prepare this statement bearing in mind the number of topics and length of time covered. If further relevant documents are identified in due course I may need to clarify or expand upon some matters.

#### Structure of statement

7. Given that the issues and topics raised by the Inquiry often arise more than once and at different times during the period, as well as the overlap between a number of topics and questions asked by the Inquiry, I have structured my statement broadly chronologically and by topic in answering the Request:
  - (a) Part 1: Background (paragraphs [8]-[28]);
  - (b) Part 2: Engagement with Second Sight Prior to their Interim Report (paragraphs [29]-[41]);

Witness: Rodric David Alun Williams  
Statement Number: WITN08420100  
Exhibits: None  
Date: 11 March 2024

- (c) Part 3: Second Sight Interim Report (paragraphs [42]-[63]);
- (d) Part 4: Actions arising from Second Sight's Interim Report (paragraphs [64]-[123]);
  - (i) Part 4.1: Prosecution and review of criminal cases following the Second Sight Interim report (paragraphs [72]-[93]);
  - (ii) Part 4.2: Mediation Scheme and related matters (paragraphs [94]-[123]);
- (e) Part 5: Second Sight's Part 2 Report and Mediation Scheme thereafter (paragraphs [124]-[139]);
- (f) Part 6: Knowledge of remote access prior to the Group Litigation (paragraphs [140]-[151]);
- (g) Part 7: POL work in respect of criminal prosecutions 2014-2016 (paragraphs [152]-[166]);
- (h) Part 8: POL communications with external parties 2014-2016 (paragraphs [167]-[175]);
- (i) Part 9: The Swift Review and follow up actions (paragraphs [176]-[184]);
- (j) Part 10: the Group Litigation (paragraphs [185]-[252]);
  - (i) Part 10.1: POL's overall strategy during the Group Litigation (paragraphs [202]-[209]);
  - (ii) Part 10.2: Information sharing (paragraphs [210]-[214]);
  - (iii) Part 10.3: Early work in the Group Litigation proceedings (paragraphs [215]-[220]);
  - (iv) Part 10.4: Disclosure (paragraphs [221]-[228]);
  - (v) Part 10.5: Preparation for the Common Issues Trial (paragraphs [229]-[236]);

Witness: Rodric David Alun Williams  
Statement Number: WITN08420100  
Exhibits: None  
Date: 11 March 2024

- (vi) Part 10.6: Preparation for Horizon Issues trial (paragraphs [237]-[246]);
- (vii) Part 10.7: Recusal application (paragraph [247]);
- (viii) Part 10.8: Engagement with CCRC during the Group Litigation (paragraphs [248]-[252]);
- (k) Part 11: Following the Group Litigation (paragraph [253]);
- (l) Part 12: General (paragraph [255]).

## **PART 1: BACKGROUND**

### **Career history**

8. I have been asked to set out a summary of my career and qualifications until joining POL.
9. I graduated with a Bachelor of Laws (LLB) from the University of Otago, Dunedin New Zealand in 1994, and was admitted as a Barrister and Solicitor of the High Court of New Zealand in 1995. I practised as a "barrister sole" in Wellington, New Zealand working on a variety of civil law related matters between 1995 and 1998, when I left New Zealand to travel to the United Kingdom. I first started working on legal matters in England and Wales in 1999 when I joined as an associate a small civil litigation practice in London called Ralph Hume and Garry, before moving to the London office of U.S. firm Duane Morris as an associate in 2000. I was admitted as a solicitor in England and Wales in 2002.
10. Between mid-2003 and 2005 I worked for Duane Morris in New York on financial services litigation matters. I was admitted to the New York bar as an attorney in

Witness: Rodric David Alun Williams  
Statement Number: WITN08420100  
Exhibits: None  
Date: 11 March 2024

2006. I returned to England in 2006 where I continued to work for Duane Morris, before joining Manches LLP as a litigation associate in 2007, where I worked until joining POL in August 2012.

### POL Legal

11. I joined POL shortly after it formally separated from Royal Mail Group, where I believe the in-house legal team had been a centralised 'group function' supporting the entire Royal Mail business. On separation, members of that team whose work focused on POL moved over to POL to form a dedicated POL in-house legal team. That process created the vacancy for an in-house civil "Litigation Lawyer", which I filled.
12. When I joined POL, the team was headed by a General Counsel, who I believe sat on the 'ExCo' or 'Group Exec'/'GE' committee of POL's most senior executives reporting to POL's Board. The General Counsel was supported by a Head of Legal (to whom I reported) and a further approximately 10 lawyers with various areas of specialism, including commercial contracts, procurement, IT, telecommunications, property, criminal law, and my litigation role. The in-house legal team was also supplemented with secondees from external legal firms from time to time.
13. Throughout my time at POL, the shape of POL's in-house legal team has changed, generally expanding to meet the demand for legal support from the business. Following Chris Aujard's appointment as Interim General Counsel in 2013, second and then third 'Head of Legal' roles were created, each of whom reported to the General Counsel. I continued to be line-managed by a Head of

Witness: Rodric David Alun Williams  
Statement Number: WITN08420100  
Exhibits: None  
Date: 11 March 2024

Legal, and around this time I started line-managing junior colleagues. A Legal Director role was created in 2016 following Jane MacLeod's appointment as General Counsel, with initially five Heads of Legal reporting to the Legal Director, who in turn reported to the General Counsel. I was promoted to "Head of Legal - Dispute Resolution & Brand" in 2017 as part of this expansion, continuing to line-manage junior colleagues as well as taking on more functional management activities (e.g. around the in-house legal team's operating models and budgets).

14. In 2020, I moved out of POL's 'business as usual' legal team to support the Historical Matters/Remediation Unit established to manage the steps being taken following the settlement of the Group Litigation. Prior to that unit being established, I believe I was the only POL-employed lawyer with dispute resolution experience, acting as the first point of internal contact within the business for contentious matters. I was, however, frequently supported by secondees from external law firms.
  
15. The Historical Matters/Remediation Unit was established in mid-2020. POL employees with the skills and experience required to help POL resolve PMR Horizon complaints following the Group Litigation were transferred to this dedicated business unit, and I was transferred as part of this internal reorganisation given my experience in dealing with these matters, in particular through the Group Litigation. As far as I could tell, the transfer was a human resources process, which changed my reporting line. I initially reported to the unit director, and then from April 2022 to the unit's legal director once that role had been created. Since that time, I have transferred my responsibilities to



Witness: Rodric David Alun Williams  
Statement Number: WITN08420100  
Exhibits: None  
Date: 11 March 2024

other lawyers within the unit's legal team so that I would have the capacity to respond to a Rule 9 Request.

My Role at POL

16. At the outset I would like to outline some overarching points about my time working at POL, namely:
- (a) My role as an in-house lawyer;
  - (b) The types of tasks that I would typically be asked to assist with;
  - (c) The approach taken to external lawyers; and
  - (d) My role in relation to criminal law matters.

*My role as an in-house lawyer*

17. As an in-house lawyer at POL my primary role has been to help POL manage its legal risks and the provision of legal support and advice to the POL business. As set out above, I was initially hired as "Litigation Lawyer", and I was promoted to "Head of Legal - Dispute Resolution & Brand" in April 2017. I note that many of the matters referred to in this statement relate to the period before this promotion. Colleagues within POL would contact me when they had a particular matter they thought required legal support, and I would look to ensure that appropriate support was provided having regard to the nature and timing of the request and the capabilities and capacity of the available resources. In my role I was contacted to assist with a wide range of matters, reflecting POL's diverse business. The diversity of the issues raised with me, and the limits of my own capacity, meant that throughout my time at POL I routinely referred matters to POL's external legal advisers in order to ensure POL received the required legal

Witness: Rodric David Alun Williams  
Statement Number: WITN08420100  
Exhibits: None  
Date: 11 March 2024

support. I would do so especially if the matter was outside of my areas of expertise, or was complex or likely to take time to conclude. I believe this reflects the general practice of the POL in-house legal team throughout the time period covered in this statement.

18. I have often been brought in to assist with a specific part of a project or to get involved in a large piece of work already underway. I would not necessarily know all that has come before, and am not expected to remain engaged with every project or piece of work unless specifically required. On certain projects I may be included in email chains not specifically related to my contribution, and being copied into an email does not necessarily mean I am engaged on a particular issue or required to focus on it, especially if someone else on the chain is better placed to do so. If a question is directed at me that I am not best placed to answer or do not have capacity, then I generally refer it to someone better placed to deal with it. This approach is necessary to make my workload manageable and, again, I believe it is consistent with the approach taken by others within the POL in-house legal team.
19. The circumstances in which legal professional privilege might apply to communications to or from me in the course of my work would be determined by the specific communication. Typically, I would seek to ensure POL could make a claim for legal professional privilege over any communication to or from me concerning the provision of legal advice (either from me or an external adviser), and/or if its dominant purpose was contemplated or actual litigation. I would often mark (or ask to be marked) as 'privileged' communications in relation to which POL might later wish to make a claim for legal professional

Witness: Rodric David Alun Williams  
Statement Number: WITN08420100  
Exhibits: None  
Date: 11 March 2024

privilege, recognising that this would not be determinative given that privilege is a question of substance not form.<sup>2</sup> I cannot speak for how other members of the POL legal team approached privilege, but I tried to keep updated on developments in the law of privilege, and would seek external legal support on questions of privilege if circumstances required.

*Tasks that I would typically be asked to assist with*

20. As I mentioned at paragraph [17] above, my primary role at POL has been to manage its legal risks and facilitate the provision of appropriate legal support and advice to the business. If a matter requiring such support is something I feel able to comment on then I may give my views. If it relates to a subject I am not familiar with or falls outside my areas of expertise, then I will either go to a subject-matter specialist myself, or direct the colleague who has raised the matter towards one. If detailed advice or sustained support is needed for an issue then, regardless of the subject matter, I engage POL's external legal advisers to deliver that support, often putting the external lawyers in direct contact with POL colleagues or embedding them in the POL team.
21. Over the period covered by this statement, I have liaised with a number of different legal specialists, both in-house and external. I may have co-ordinated obtaining instructions or delivering advice within POL, or I may have served as an escalation point for the external advisers or others within POL who were working with them.

---

<sup>2</sup> I was also aware that as an in-house lawyer privilege might not apply to some of my communications in the context of EU competition investigations, but in practice that was not a situation I was involved with.

Witness: Rodric David Alun Williams  
Statement Number: WITN08420100  
Exhibits: None  
Date: 11 March 2024

22. I have often been asked to distil or synthesise information provided from various parts of the business for other audiences within the business, particularly if the information concerns legal issues with which I have some familiarity. Sometimes I would be specifically told who the information was for. On other occasions I would provide it to those I thought best placed to receive and act upon it. My focus when carrying out such tasks is usually on the form of the information, making sure it is focused and comprehensible for its intended audience. I generally rely on others for the accuracy of the content, especially if it concerns areas outside my expertise, with my role being to 'sense check' it.

*Approach to external lawyers*

23. External lawyers would be engaged in the way which best supported the specific matter on which they were being instructed. Very broadly, the process could involve the member of the POL legal team directly engaging the external lawyer for discrete pieces of support or advice, or the external lawyers working directly with POL non-lawyer colleagues, with the POL lawyer acting as an escalation point or providing input on specific issues. The latter was often the case for large or long running projects, or for established business activities. For example, when I first joined POL the Agent Debt team would liaise directly with external lawyers at DAC Beachcroft and Womble Bond Dickinson ("**WBD**")<sup>3</sup> and would not routinely involve a member of the POL legal team.
24. External lawyers would be chosen based on their expertise and understanding of POL's business and operations. As an in-house lawyer, I would rely on them

---

<sup>3</sup> Bond Pearce became Bond Dickinson on 1 May 2013 following the completion of a merger. The firm later merged with a US firm to become Womble Bond Dickinson. In this statement, I always refer to the firm as WBD.

Witness: Rodric David Alun Williams  
Statement Number: WITN08420100  
Exhibits: None  
Date: 11 March 2024

to provide the appropriate advice and support as, unless the matter concerned something I was familiar with and I had capacity, I would not be able to look behind it.

*Role in relation to criminal prosecutions*

25. I have been asked by the Inquiry to comment on aspects of criminal prosecutions. Prior to joining POL, I had no real experience of criminal law issues, and, although I have developed some understanding of them through my employment at POL, I still do not believe I have a properly informed basis to express views on them now and would rely on specialist advice in this area. I did not prosecute PMRs on behalf of POL, or have first-hand knowledge of how Horizon was used in prosecutions. Prior to joining POL, I do not recall ever encountering the Criminal Cases Review Commission ("CCRC"). As noted above, I have through my employment by POL developed some understanding of criminal law processes, which I have obtained from criminal lawyers advising POL. If I ever sought advice in relation to aspects of criminal law I would rely on that, especially given I did not have any personal experience to test it against. For the same reason, if a matter I was involved in raised issues relevant to criminal prosecutions, I might not identify them. For much of the time covered by this statement, the criminal law advice POL received was managed within the POL in-house legal team by my colleague Jarnail Singh (POL Criminal Lawyer), with my role being to help collate or distil material connected to POL's prosecution activities.



Witness: Rodric David Alun Williams  
Statement Number: WITN08420100  
Exhibits: None  
Date: 11 March 2024

Knowledge of Horizon following joining POL

26. Prior to joining POL, I had no knowledge of the Horizon IT System. I was not briefed or trained in connection with Horizon as part of my induction, and do not recall it being discussed when I was interviewed for my role in 2012. I later received basic training on how to operate a Horizon terminal, but my limited understanding of Horizon as a system has really come from assisting with the legal issues I describe later in this statement. I have always relied on those with the appropriate technical or operational knowledge to provide instructions in relation to Horizon.
27. The Inquiry has drawn my attention to some documents that predate my joining POL, and asked me to comment on my awareness of them when I joined. I did not read the *Computer Weekly* article dated May 2009<sup>4</sup> prior to joining POL, and I cannot recall there being any discussion within POL's legal department, or more widely within POL, about *Computer Weekly's* reporting on Horizon around the time I joined. I do not recall reading the report by Rod Ismay (the POL Head of Finance Service Centre) of 2 August 2010<sup>5</sup> when I joined POL and believe I first saw it sometime in 2020. Nor do I recall seeing the Ernst & Young LLP ("EY") Report of 27 March 2011 when I joined POL. Although it is possible I was sent this, I do not recall if or when I first saw it.<sup>6</sup>

---

<sup>4</sup> Computer Weekly article "Bankruptcy, prosecution and disrupted livelihoods - Postmasters tell their story" dated 11 May 2009 (POL00041564)

<sup>5</sup> Report of Rod Ismay "Horizon – Response to Challenges Regarding Systems Integrity" dated 2 August 2010 (POL00026572)

<sup>6</sup> EY Report "Post Office Limited – Management letter for year ended 27 March 2011" dated 27 March 2011 (POL00030217)

Witness: Rodric David Alun Williams  
Statement Number: WITN08420100  
Exhibits: None  
Date: 11 March 2024

28. I do not recall being involved in responding to questions raised by PMRs, the Justice for Subpostmasters Alliance ("JFSA"), MPs or journalists about the reliability of Horizon when I joined POL, nor being aware of complaints about Horizon. As I will refer to later, this did change over time.

**PART 2: ENGAGEMENT WITH SECOND SIGHT PRIOR TO THEIR INTERIM REPORT**

29. I was first exposed to the controversy around Horizon in September 2012, not long after I joined POL. The context for this was that I was asked by my line manager Hugh Flemington (Head of Legal), to assist a project team within POL led by Simon Baker (Head of Business Change and Assurance) with providing documents to Second Sight Support Services Limited ("**Second Sight**"). I understood this related to work Second Sight were undertaking, exploring whether Horizon could be the source of unresolved accounting shortages in Post Office branches.
30. Second Sight had been appointed before I joined POL and I did not have any direct knowledge of that process or how the scope of Second Sight's original retainer was determined. As noted above, my first involvement was assisting the project team at POL with providing documents to Second Sight to support their ongoing work. Those documents included legal files, and, as a new lawyer joining POL, I felt I needed to raise the risks around disclosing legally privileged documents to a third party without putting a clear framework in place to govern their use. It was made clear to me by those within POL however that POL wanted to ensure Second Sight were able to see the privileged documents as part of their review. I therefore worked with POL's external lawyers, WBD, to

Witness: Rodric David Alun Williams  
Statement Number: WITN08420100  
Exhibits: None  
Date: 11 March 2024

put a framework in place to allow that. This was agreed with Second Sight in mid-October 2012.

31. Also in October 2012, Hugh Flemington asked me to look at a document, drafted by the JFSA,<sup>7</sup> which aimed to encourage PMRs to come forward with any concerns they had about Horizon being responsible for accounting shortages in their Post Office branches. I therefore worked with Stephen Hocking, a public law partner at DAC Beachcroft, to agree with Second Sight and the JFSA a document entitled 'Raising Concerns with Horizon' ("**Raising Concerns**"). Raising Concerns set out a process by which concerns regarding Horizon could be raised, and also clarified the remit, conduct and output of the work that Second Sight was undertaking (because a retainer for this had seemingly not been agreed at the time of Second Sight's appointment). Raising Concerns was agreed for publication in late December 2012.<sup>8</sup>

32. While these tasks gave me some awareness of the controversy around Horizon, I did not get into the detail of Second Sight's work or the underlying complaints, and I was not involved in considering the merits of any of the concerns being examined by Second Sight.

### Second Sight Spot Reviews

#### *My role in the 'Spot Review' process*

33. I do not now recall when or how I first became aware that 'Spot Reviews' were being carried out in connection with Second Sight's work. I do recall that these

---

<sup>7</sup> This is the first time I recall dealing with the JFSA, although it is likely that they had been mentioned to me beforehand, for example when I was arranging for documents to be provided to Second Sight.

<sup>8</sup> Signed 'Raising Concerns with Horizon' document (undated) (POL00060374)

Witness: Rodric David Alun Williams  
Statement Number: WITN08420100  
Exhibits: None  
Date: 11 March 2024

were a mechanism developed by POL and Second Sight to understand better some of the specific complaints PMRs had raised, by looking into them closely to try to draw out and address key themes, questions and issues. This work was undertaken by the POL project team working with Second Sight, which did not include me, supported by external lawyers WBD.

34. I remember reviewing drafts of a number of Spot Reviews to get a sense of what they looked like, and sharing some thoughts with WBD. I do not now recall my comments, although it is likely that they related to whether the Spot Reviews were comprehensible and would serve the purpose for which they were prepared. I recall that POL sought to organise the preparation and drafting of the Spot Reviews in a way that would maximise the potential for POL to claim legal professional privilege over them and any exchanges with Fujitsu relating to them as they were being developed. I believe the basis for this was broadly that they concerned contentious issues, which WBD as POL's solicitors (with recent experience of responding to Horizon related claims advanced by the law firm Shoosmiths) would investigate, draft and advise on as appropriate, before finalised, non-privileged, Spot Reviews would be released.<sup>9</sup> I do not sufficiently recall the details of Spot Reviews to comment now on the points raised by Kay Linnell in her email of 14 May 2013.<sup>10</sup> I do believe, however, that the Spot Reviews were prepared for Second Sight as forensic accountants to take forward through their investigation.

---

<sup>9</sup> See for example Email of Rodric Williams to Simon Baker dated 12 May 2013 at 23.56 (POL00296484)

<sup>10</sup> Email from Kay Linnell to Ron Warmington and others dated 14 May 2013 at 10.41 (POL00098294)

Witness: Rodric David Alun Williams  
Statement Number: WITN08420100  
Exhibits: None  
Date: 11 March 2024

35. I have been asked to consider draft Spot Review SR001.<sup>11</sup> I do not recall having any meaningful input on this document during the Spot Review process, and, as noted above, I would not have been able to comment on the technical aspects of it.

*Digesting information relating to the Spot Review process*

36. The Inquiry has asked me to comment on a draft email addressed to John Scott (the POL Head of Security) and Rob King (the POL Senior Security Manager and his deputy), which was sent to me and Simon Baker on 13 May 2013 by Dave Posnett (an Accredited Financial Investigator).<sup>12</sup> The draft contains a series of bullet point updates on the Spot Review process. It appears from the email that I had asked for draft updates to be sent to me for forward transmission to John Scott and Rob King. I believe I requested this for two reasons. First, part of my role was sometimes to review and/or distil information provided by one part of the business comprehensibly for other parts of the business so that there was a consistent 'joined up' position. Second, if the emails contained legal advice or concerned matters on which legal advice would be required then POL would be better placed to claim legal professional privilege over the material if it had been sent to or received by a legal adviser. I would not have been able to, or expected to, verify the factual statements Dave Posnett made in his draft email to me that "[n]one of the Spot Reviews to date have found specific faults with Horizon", and Dave Posnett did not seek my

---

<sup>11</sup> Draft Horizon Spot Review SR001 dated 4 October 2012 (POL00040888)

<sup>12</sup> Email from Dave Posnett to Rodric Williams dated 13 May 2013 at 19.34 (POL00107912)



Witness: Rodric David Alun Williams  
Statement Number: WITN08420100  
Exhibits: None  
Date: 11 March 2024

input on that point. When I forwarded the email to John Scott and Rob King on 22 May 2014, this phrase was unchanged.<sup>13</sup>

37. An email I sent to Paula Vennells (the POL Chief Executive) on 27 June 2013<sup>14</sup> is an example of me co-ordinating and distilling input from different parts of the business. The content would have come from various sources. I cannot remember who else was present at the meeting referred to in the email, but I copied my line manager Hugh Flemington and Alwyn Lyons (the POL Company Secretary) and the email was forwarded to Susan Crichton (HR & Corporate Services Director<sup>15</sup>). In terms of the contents of the email, my general understanding is that POL did not believe there were systemic issues with Horizon at the time because the system was being used in a large number of branches by a large number of users to process a very large number of transactions every day. If there had been systemic issues, POL therefore expected that there would have been complaints and business disruption from a much greater number of system users than it seemed to be experiencing. The Inquiry has drawn my attention to two specific passages in the email relating to criminal prosecutions and convictions:

*"Second Sight seem to be saying that because Horizon has "bugs", it is not safe for Post Office to rely upon the data it produces, e.g. in a criminal case to show branch shortfalls"*

*"No cases since at least separation have seen convictions secured on Horizon-based evidence alone, e.g. there has also been a paper trail, money in bank account, and/or lies at interview exposed".*

---

<sup>13</sup> Email from Dave Posnett to Rodric Williams dated 22 May 2013 at 09.59 (POL00107919)

<sup>14</sup> Email from Rodric Williams to Paula Vennells dated 27 June 2013 at 15.02 (POL00098774)

<sup>15</sup> This was Susan Crichton's title, but functionally her role was one of General Counsel.

Witness: Rodric David Alun Williams  
Statement Number: WITN08420100  
Exhibits: None  
Date: 11 March 2024

For the reasons set out at paragraph [25] I believe these passages will have been provided by or derived from POL's criminal lawyers.

38. The Inquiry has also asked me to comment on an email of 2 April 2013 sent from Simon Baker to Gareth Jenkins of Fujitsu, who was providing technical input on the Spot Reviews, and Andy Winn, who was a Relationship Manager in Rod Ismay's team at POL's Finance Service Centre.<sup>16</sup> I was copied into this email along with a number of others but have no specific recollection of it now, and do not remember attending the workshop Simon Baker mentions. I have, however, found an email showing that Simon asked me to help find a room for the workshop on 10 April 2013 at WBD, who presumably were the "legal adviser" referred to in the email. The meeting appears to have proceeded at POL's offices and been attended by Gavin Matthews and Andrew (Andy) Parsons from WBD. The Inquiry has drawn my attention to the following specific passage in the email:

*"our responses don't...drive home our message in a compelling way – that would persuade MPs or the media or members of the public that there are no issues [with Horizon.]"*

I did not write this but, given that POL did not believe there were systemic issues with Horizon at the time, it seems to me that if there was a credible response to an issue raised in a Spot Review, then POL would have wanted that to be clearly articulated for others to see.

---

<sup>16</sup> Email from Simon Baker to Gareth Jenkins and others dated 2 April 2013 at 20.09 (POL00097917)

Witness: Rodric David Alun Williams  
Statement Number: WITN08420100  
Exhibits: None  
Date: 11 March 2024

*Civil recovery and the Spot Review process*

39. The Inquiry has asked me to comment on the extent to which POL continued seeking civil recovery of alleged debt from PMRs during the Second Sight investigation. I have been reminded by emails from the time that the Agent Debt team sought advice on the approach they should take to civil recovery when a Spot Review was pending. In response, I wrote to Alison Bolsover (Debt Recovery Senior Manager) to say that POL could not start taking civil action against any individual who had submitted an issue to Second Sight (in line with Raising Concerns referred to in paragraph [31] above). I asked Simon Baker to get a list of everyone who had done this, so it could be supplied to the Agent Debt team.<sup>17</sup> I understand that the Agent Debt team did intend to halt all standard debt recovery processes for such cases, and that they were provided with updated lists as further cases came forward.
40. In January 2013 the Agent Debt team had their own processes for discussing and seeking to resolve or recover branch shortfalls, with some cases eventually escalating to legal proceedings.<sup>18</sup> As I mentioned at paragraph [23] above, the in-house legal team at POL did not typically get involved in this process. Instead, the Agent Debt team would deal directly with POL's external lawyers (in this case, DAC Beachcroft) who would contact POL legal if they wanted to raise a particular issue on a specific case.
41. The Inquiry has also asked me to comment on an email of April 2013 from Michelle Stevens (Missing Cheques & Former Agents Accounts Manager)

---

<sup>17</sup> Email from Rodric Williams to Alison Bolsover and others dated 20 May 2013 at 14.32 (POL00086707)

<sup>18</sup> Email from Sarah Gomes to Rodric Williams dated 3 January 2013 at 15.58 (POL00107854)

Witness: Rodric David Alun Williams  
Statement Number: WITN08420100  
Exhibits: None  
Date: 11 March 2024

relating to debt recovery following the criminal conviction of Lynette Hutchings in August 2012.<sup>19</sup> I have no recollection of this email or the matter to which it relates, but it indicates that the basis for seeking recovery was that the amount alleged to have been gained was the proceeds of crime. I can see that I raised the need to consider carefully what steps, if any, should be taken whilst the Second Sight investigation was still ongoing, and that I added Andy Pheasant of WBD to the chain so he could provide his input directly to the Agent Debt team. The email chain suggests that the Agent Debt team may have put their processes on hold, but, if this was not a case being considered by Second Sight, then my understanding is that there was an opportunity for the PMR to dispute recovery through the standard recovery process.

### **PART 3: SECOND SIGHT INTERIM REPORT**

42. I described my initial involvement with Second Sight's work in 2013 at paragraphs [29] to [32] above. Through this I gained some awareness of the controversy around Horizon. I did not, however, get into detail about Second Sight's work or the complaints about Horizon until later, when Second Sight came to publish an update on their findings in the Second Sight 'Interim Report into alleged problems with the Horizon system' ("**Interim Report**") in mid-2013. At that point, POL received a draft of the Interim Report, and its impending publication generated significant activity within POL. As part of that, I was asked to assist senior management in relation to the draft Interim Report and POL's response to it. This involved collating and synthesising information from various sources on matters which the Interim Report might raise. I set out below at

---

<sup>19</sup> Email from Rodric Williams to Michelle Stevens and others dated 17 April 2013 at 18.29 (POL00114617)

Witness: Rodric David Alun Williams  
Statement Number: WITN08420100  
Exhibits: None  
Date: 11 March 2024

paragraphs [43] to [57] the issues that I was asked to look into as part of this work, and then set out at paragraphs [58] to [60] my work assisting with liaison with senior management.

### Knowledge of BEDs

43. It was the imminent publication of the Second Sight Interim Report that focused attention on bugs, errors and defects ("**BEDs**") in Horizon and through this, I learned that POL was aware of two 'bugs', which had been raised with Second Sight and would be discussed in their Interim Report. The information I saw indicated that these bugs had all been identified and resolved, and relevant affected parties had been, or were now being, informed. I discuss this further in paragraphs [44] to [54] below. It was also through the Second Sight process that I recall first becoming aware of issues relating to criminal prosecutions and duties of disclosure relating to BEDs. I discuss this further at paragraphs [72] to [75] below.

### *The Callendar Square bug and Horizon issues in litigation*

44. I have been asked to comment on some 1 July 2013 emails concerning the 'Callendar Square bug' (sometimes called the 'Falkirk' bug).<sup>20</sup> These events happened over 10 years ago, so I do not now have a firm recollection of how they unfolded. As far as I recall, I was asked by Simon Baker to find out whether Horizon bugs had been referred to in any previous court actions, in anticipation

---

<sup>20</sup> Email from Jarnail Singh to Hugh Flemington and others dated 1 July 2013 at 16.47 (**POL00062368**); Email from Andy Parsons to Rodric Williams dated 1 July 2013 at 14.49 (**POL00060590**); Bond Pearce document 'Horizon is free from defects' (**POL00060591**); Bond Pearce Memo 'Misra transcript' dated October 2011 (**POL00060592**); Bond Pearce document 'POL Training Adequate' (**POL00060593**); and Bond Pearce document titled 'POL Helpline Adequate' (**POL00060594**)



Witness: Rodric David Alun Williams  
Statement Number: WITN08420100  
Exhibits: None  
Date: 11 March 2024

of the publication of the Second Sight Interim Report. This led me to put this question to WBD and DAC Beachcroft, given that to the best of my knowledge they were the POL external lawyers most likely to have supported POL in any civil action.

45. This activity made clear to me that Horizon bugs had been discussed in two court cases, namely the 2007 civil case of *Post Office Limited v Castleton* [2007] EWHC 5 (QB) and the 2010 criminal prosecution of Seema Misra. In the context that I was looking at them in mid-2013 however, there was no reason for me to look into this further. That was because the cases had concluded quite some time earlier and there were no indications from those I was supplying the information to that anything further was required.

*The local suspense and receipts and payments mismatch bugs*

46. I have been asked to comment on my knowledge in mid-2013 of the 'local suspense bug' (sometimes called the '14 Branch bug' or 'B14', reflecting the number of branches believed to have been affected). I have been referred by the Inquiry to some emails mentioning it from around the same time as those relating to the 'Callendar Square bug', referred to above.<sup>21</sup> I believe that POL had brought the 'local suspense bug', along with the 'receipts payments mismatch bug' (sometimes referred to as the '64 Branch Bug', again reflecting the number of affected branches) to Second Sight's attention. The context in

---

<sup>21</sup> Email from Rodric Williams to Lesley Sewell and others dated 27 June 2013 at 18.51 (POL00144855); Draft letter to J Mistry 'Re Branch Discrepancies' (POL00144856); Draft letter to D Cheape 'Re Branch Discrepancies at Dundas Post Office' (POL00144857); Email from Rod Ismay to Rodric Williams and others dated 28 June 2013 at 14.01 (POL00029622); 'Branch Accounting Incidents' (POL00029623); Draft letter to J Mistry v2 'Re Branch Discrepancies' (POL00141543); and Email from Hugh Flemington to Susan Crichton dated 4 July 2013 at 07.51 (POL00098969)

Witness: Rodric David Alun Williams  
Statement Number: WITN08420100  
Exhibits: None  
Date: 11 March 2024

which I came to deal with these bugs was the same as I have described above in respect of the Callendar Square bug, and my role was again to collate and distil information for use by others considering POL's response to the Interim Report. I was also involved in instructing WBD to help POL write to notify the affected (non-POL operated<sup>22</sup>) branches about these bugs,<sup>23</sup> with the WBD draft letters appearing to have been finalised by others within POL.<sup>24</sup>

47. Although I cannot now remember precisely what took place at this time, from re-reading the documents provided to me by the Inquiry it appears that Lesley Sewell (Chief Information Officer) wanted to see a timeline of the steps taken with respect to the 'local suspense bug'. I discussed the matter with the relevant subject matter expert within POL, Andy Winn. I then recorded that discussion in an email which I circulated to the appropriate people within POL, copying Andy Winn to make sure I had fairly reflected what he had told me. Hugh Flemington then forwarded this to Susan Crichton and Jarnail Singh, to ensure that the different parts of the POL legal team (who might be fielding enquiries from different parts of the business) remained up to date with developments. The letters were also shared with POL's external criminal lawyers Cartwright King for their input. Like the Callendar Square bug, the 'local suspense bug' seems to have been known to those responsible for managing Horizon, and Fujitsu seems to have confirmed that the issue had been resolved. As far as I was aware therefore, the focus in mid-2013 was on making sure the PMRs

---

<sup>22</sup> 'Crown' branches were branches directly managed by POL.

<sup>23</sup> Email from Rodric Williams to Lesley Sewell and others dated 27 June 2013 at 18.51 (POL00144855); Draft letter to J Mistry 'Re Branch Discrepancies' (POL00144856); and Draft letter to D Cheape 'Re Branch Discrepancies at Dundas Post Office (POL00144857)

<sup>24</sup> Email from Rod Ismay to Rodric Williams and others dated 28 June 2013 at 14.01 (POL00029622); and 'Branch Accounting Incidents' (POL00029623)

Witness: Rodric David Alun Williams  
Statement Number: WITN08420100  
Exhibits: None  
Date: 11 March 2024

whose branches had been affected were all made aware of the issue through these letters.

48. The Inquiry has asked me specifically about my comment in **POL00144855** that *“Legal need to do a final cross check of the intended recipients to make sure they are not the subject of any prosecutions/investigations”*. This links to a second comment I made in **POL00029622** (*“reminder that no correspondence is to be sent on this issue until authorised by Post Office Legal”*). As I explained at paragraph [22] above, at times part of my job would be to help manage the consistent movement of information within POL. In this case, where the legal team was ‘holding the pen’ on the letters, that meant making sure the letters were not sent out until they had been approved by any other parts of the business which could be affected by them. In this case, that included POL’s criminal law team, who were considering the bugs for disclosure purposes. As it transpired, one of the affected Post Office branches (operated by the chain Costcutter) was the subject of a prosecution being conducted by the Crown Prosecution Service (“**CPS**”), so advice was taken from POL’s external criminal lawyers Cartwright King, who ultimately advised that POL could send the letters to the affected branches and that Cartwright King would address disclosure with the CPS (see paragraphs [49] to [50] below).<sup>25</sup> Legal professional privilege was being asserted over this email because POL was taking legal advice on the form and content of the draft letters from its external civil and criminal lawyers. The final ‘as sent’ versions of the letters were not legally privileged.

---

<sup>25</sup> Email from Simon Clarke to Rodric Williams dated 4 July 2013 at 14.14 (**POL00006540**)

Witness: Rodric David Alun Williams  
Statement Number: WITN08420100  
Exhibits: None  
Date: 11 March 2024

49. I have been referred by the Inquiry to an email exchange with Simon Clarke of Cartwright King on 3 and 4 July 2013, following a meeting I attended with him.<sup>26</sup> I do not recall that meeting but it seems my email attempted to summarise it and the actions arising from it. My email refers to the Costcutter prosecution that had been affected by the 'local suspense bug'. The Inquiry has also shown me an email chain from 4 July 2013, which includes information provided by Gareth Jenkins at Fujitsu about when the 'local suspense bug' was raised.<sup>27</sup> My role in this was again I believe concerned with ensuring that relevant information was shared with those who might need to act upon it. In this case, that seemed to be providing to Cartwright King the information collated on the 'local suspense bug' to enable them to provide their advice to POL.
50. I have also been asked to comment on an email sent by Hugh Flemington to Cartwright King, copying me, at 08:01 on 4 July 2013.<sup>28</sup> I believe this shows Hugh undertaking the same role as I described above, namely ensuring that they had the relevant information (in this case, Andy Winn's update to the 'local suspense bug' timeline I had sent to them earlier). I do not know but suspect that Susan Crichton forwarded the email chain to Simon Baker so that he was similarly "joined up" on what was being said about the 'local suspense bug'.
51. The Inquiry has also asked me to comment on any concerns I had, arising from what I knew about the 'local suspense bug', about the overall reliability of the Horizon IT system. From my involvement, my understanding was that Horizon had some errors, but these were few, affected a small number of branches, and

---

<sup>26</sup> Email from Rodric Williams to Martin Smith and others on 3 July 2013 at 19.50 (POL00145130); and Email from Simon Clarke to Rodric Williams dated 4 July 2013 at 11.03 (POL00145145)

<sup>27</sup> Email from Susan Crichton to Simon Baker dated 4 July 2013 at 12.49 (POL00029648)

<sup>28</sup> Email from Hugh Flemington to Simon Clarke dated 4 July 2013 at 08.01 (POL00145142)



Witness: Rodric David Alun Williams  
Statement Number: WITN08420100  
Exhibits: None  
Date: 11 March 2024

were being identified, and that there were processes in place for identifying and resolving the issues.<sup>29</sup>

#### *Other BEDs*

52. The Inquiry has also asked me about any other BEDs I was aware of by July 2013. At the end of July 2013, I was made aware of an issue by John Scott, after Dave Posnett had reported observing an anomaly at a particular Post Office branch during a security visit.<sup>30</sup> I was copied into emails about this and asked to provide legal support as appropriate. Further emails that I was copied into confirmed that Steve Beddoe (Senior IT Services Manager) was looking into the matter, and would be passing information about it on to Fujitsu. As far as I was concerned given my newness to the issues, those who needed to be aware of the issue in order to resolve it were therefore involved.<sup>31</sup>

#### *Michael Rudkin/Bracknell allegations*

53. The Inquiry has asked me to comment on two further emails from mid-2013, sent around the same time as those mentioned above.<sup>32</sup> I believe the first relates to an issue which arose out of Spot Review SR005, and involved an allegation made by Michael Rudkin that he had observed an individual at the Fujitsu office in Bracknell demonstrating an ability to alter remotely transactions in the Horizon system. As far as I can recall, this was the first time I encountered

---

<sup>29</sup> For example, this was the information conveyed to me in Email from Hugh Flemington to Rodric Williams dated 27 June 2013 at 18.21 (POL00296729)

<sup>30</sup> Email from John Scott to Rodric Williams dated 31 July 2013 at 11.37 (POL00298046)

<sup>31</sup> By this stage, as I discuss below, the weekly Horizon call had been established. My role was to ensure, in line with the objective of the weekly Horizon call, that issues like this with Horizon were collated in one place. See details of the weekly calls at paragraph [69] to [71] below.

<sup>32</sup> Email from Simon Baker to Rodric Williams dated 1 July 2013 at 10.31 (POL00060580); and Email from Simon Baker to Andrew Winn and others dated 22 July 2013 at 15.33 (POL00099340)



Witness: Rodric David Alun Williams  
Statement Number: WITN08420100  
Exhibits: None  
Date: 11 March 2024

the allegation that it was possible for Fujitsu or POL to gain 'remote access' to Horizon and alter individual Post Office branch accounts. I now know this to be a recurring theme (albeit at times expressed differently) in PMRs' complaints about Horizon.

54. As reflected in **POL00060580**, Simon Baker asked me to help produce a witness statement from someone suitable at Fujitsu to respond to the allegation, which was being considered by Second Sight and which they wanted to address. I therefore put WBD in touch with Martin Rolfe, who had been identified as the appropriate person to respond to the allegation, and WBD duly prepared and agreed a statement with him.<sup>33</sup>
55. The email chain at **POL00099340** concerns stock adjustments relating to stamps. I do not recall playing any role. The chain was forwarded to me on 16 July 2013, but I was on holiday. I assume that is why I then dropped off subsequent emails. Those involved included Simon Baker, Craig Tuthill (Head of Network Services), Lin Norbury (Agents Contracts Deployment Manager South), Angela van den Bogerd (People Services Director) and Rod Ismay, who, based on my limited experience at that time, were senior individuals within the POL business well placed to address Post Office branch processes and procedures being investigated by Second Sight.

---

<sup>33</sup> Email from Andy Pheasant to Martin Rolfe dated 3 July 2013 at 12.04 (**POL00190358**)

Witness: Rodric David Alun Williams  
Statement Number: WITN08420100  
Exhibits: None  
Date: 11 March 2024

*The Helen Rose report*

56. The Helen Rose report<sup>34</sup> is a document I was asked to look at by Susan Crichton in July 2013. My email to her summarising the background to the issue explains that Second Sight had approached Angela van den Bogerd in 2012, prior to the Spot Review process being established, about a potential issue relating to a transaction reversal at the Lepton Post Office Branch.<sup>35</sup> Angela van den Bogerd asked Helen Rose (POL Security Manager - Fraud Analyst) to look into the transaction data to see if she could identify any anomalies around the transaction reversal, and Helen Rose made enquiries of Gareth Jenkins at Fujitsu about it. Although it appears that the Spot Review process went into this type of transaction issue in greater detail, superseding Helen Rose's work, it appeared Helen Rose nevertheless packaged the work into a report, which Dave Posnett sent to me on 14 June 2013.<sup>36</sup>
57. I understand that Helen Rose marked her report as legally privileged because she intended to send it to POL Legal for review. Although Dave Posnett noted in his email to me that the Lepton Post Office Branch did not feature as part of the Second Sight Spot Reviews, he asked me to consider it and provide any comments, particularly in terms of using the data for evidence/prosecution purposes. I then forwarded the email and report on to Andy Parsons at WBD so he could consider the issue and give me an overview.<sup>37</sup> Andy noted that (contrary to Dave Posnett's understanding) the reported transaction reversal at

---

<sup>34</sup> Draft report 'Horizon data Lepton SPSO 191320' ("**Helen Rose report**") dated 12 June 2013 (POL00022598)

<sup>35</sup> Email from Rodric Williams to Susan Crichton dated 13 July 2013 at 00.48 (POL00191994)

<sup>36</sup> Email from Dave Posnett to Rodric Williams dated 14 June 2013 at 09.23 (POL00188312)

<sup>37</sup> Email from Rodric Williams to Andy Parsons dated 3 July 2013 at 08.53 (POL00190324)

Witness: Rodric David Alun Williams  
Statement Number: WITN08420100  
Exhibits: None  
Date: 11 March 2024

the Lepton Post Office Branch did relate to the Spot Reviews, but that the Helen Rose report did not undermine the Spot Review response. The advice was that the proposed solution in the report regarding the availability of data was a sensible one, but would probably need the support of Fujitsu.<sup>38</sup> I then sent the report on to Martin Smith and Simon Clarke at Cartwright King on 8 July 2013 and asked them to ensure that the issue was considered as part of their review of the historic prosecution files and also in connection with existing cases.<sup>39</sup> I will return to this below at paragraphs [73] to [79] as part of the discussion on criminal prosecutions.

Liaison with senior management in connection with draft and final Second Sight Interim Report

58. On 2 July 2013, I was asked by Hugh Flemington and Susan Crichton to coordinate revisions to a draft briefing note<sup>40</sup> he had prepared for Paula Vennells, to provide a consolidated overview of the background to and issues arising out of the draft Second Sight Interim Report. I do not recall the origins of this draft briefing note, but at some point in the process I became the one 'holding the pen'.
59. I have been asked specifically to explain the background to paragraph 25 of the briefing note concerning a Costcutter branch and any further work I carried out in relation to it. I set this out at paragraphs [46] to [51] above.

---

<sup>38</sup> Email from Andy Parsons to Rodric William dated 3 July 2013 at 10.43 (POL00145108)

<sup>39</sup> Email from Rodric Williams to Martin Smith and others dated 8 July 2013 at 14.19 (POL00145261)

<sup>40</sup> Email from Rodric Williams to Lesley Sewell and others dated 2 July 2013 at 14.19 (POL00115918); and 'Internal Briefing Note to Paula Vennells: Second Sight review into Horizon – Implications of Interim Report' dated 2 July 2013 (POL00115919)

Witness: Rodric David Alun Williams  
Statement Number: WITN08420100  
Exhibits: None  
Date: 11 March 2024

60. The Inquiry has shown me an email dated 5 July 2013 from Paula Vennells.<sup>41</sup> This refers to a meeting I did not attend where the issue of charging PMRs with more than one offence was apparently discussed. I later became aware of allegations that POL prosecutors had been improperly charging defendants with theft and false accounting so that they would plead guilty to the 'lesser charge' of false accounting. I comment further on this subject at paragraph [200] below.

*Circulation of finalised Second Sight Interim Report*

61. I understand that Second Sight finalised their Interim Report on 7 July 2013. When the final Second Sight Interim Report was first shared with POL, it went to people at a senior level. Having looked at my emails it appears it was then forwarded on to me late the same evening.<sup>42</sup> Having reviewed the final Interim Report as part of the preparation of this statement, it seems broadly consistent with the draft I had previously seen.
62. I have been asked specifically to comment on Second Sight's use of the word 'systemic' in the report, which I assume refers to paragraph 8.2(a), where Second Sight wrote that: "*we have so far found no evidence of system wide (systemic) problems with the Horizon software*". As far as I can recall, I understood this to mean that although Second Sight's Interim Report discussed some specific issues with Horizon and user support, they had not identified any fundamental flaw with the system which called into question its reliability

---

<sup>41</sup> Email from Paula Vennells to Alwen Lyons dated 5 July 2013 at 17.33 (POL00115958)

<sup>42</sup> Email from Simon Baker to Paula Vennells and others dated 7 July 2013 at 16.30 (POL00115985); and Second Sight 'Interim Report into alleged problems with the Horizon system' (POL00099063)

Witness: Rodric David Alun Williams  
Statement Number: WITN08420100  
Exhibits: None  
Date: 11 March 2024

generally. This was regarded within POL as a positive outcome, as reflected in Simon Baker's email at **POL00115985**.

63. I am also referred to my email to Paula Vennells of 8 July 2013, which provides commentary on the Interim Report. Reviewing the position now, it seems that on the evening of Sunday 7 July 2013 Paula Vennells asked for a summary of the comments made within POL about the Interim Report for use on a call she would be having with Alan Bates from the JFSA the next morning. I prepared that summary the same night (with some direction from Susan Crichton) and sent it early in the morning of Monday 8 July 2013.<sup>43</sup> I cannot speak for POL as to whether this summary fully reflected all points of disagreement with the Interim Report. It did, however, reflect the general concern amongst those in POL who were considering the Interim Report that the document often failed to set out clear reasoning and evidenced basis for their findings which were required if POL was to understand properly and start addressing the issues Second Sight had identified. POL had tried to encourage Second Sight to set out the clear reasoning and evidential basis for their findings both when Raising Concerns was agreed and also I recall on a call I attended before the draft Interim Report was finalised.

#### **PART 4: ACTIONS ARISING FROM SECOND SIGHT'S INTERIM REPORT**

64. POL's strategic response to the Second Sight Interim Report was a matter for senior management and the Board and POL Legal was asked for input as required. For example, in a draft board update on 22 July 2023, I set out the

---

<sup>43</sup> Email from Rodric Williams to Paula Vennells and others on 8 July 2013 at 01.42 (**POL00099107**)



Witness: Rodric David Alun Williams  
Statement Number: WITN08420100  
Exhibits: None  
Date: 11 March 2024

headline legal issues, as far as I understood them, that POL Legal had been asked to consider following the publication of the Interim Report.<sup>44</sup>

65. The Inquiry has asked me to comment on this draft board update as well as the cover email attaching it that I sent to Susan Crichton on 22 July 2013.<sup>45</sup> I do not now recall how the request for the update came about. Having reviewed emails from around this time, it seems that I sent my email to Susan on the only day I worked during a period of annual leave between 13 and 25 July 2013. I was not across all the workstreams mentioned in the draft board update so it must have been created by collating, distilling and checking information from other sources.<sup>46</sup> There are placeholders and queries in the draft, including asking Jarnail Singh to confirm who the disclosure officer was when POL prosecuted criminal cases. I have been asked to comment on why there was a section on directors' personal liabilities. I believe this was included in response to a specific request from the Board. The information for this part of the update came from WBD who sent me a summary of director's duties and actions that could give rise to personal liability.<sup>47</sup>
66. I have been asked a number of questions by the Inquiry that broadly relate to two of the legal issues that arose from the Second Sight Interim Report: (a) the approach to criminal prosecutions and past convictions, and (b) the approach to resolving cases that Second Sight had been investigating. I was not leading on either of these issues but had varying degrees of awareness of them. These

---

<sup>44</sup> Draft update to the Board regarding Horizon Legal Issues dated 22 July 2013 (POL00040002)

<sup>45</sup> Email from Susan Crichton to Andy Parsons dated 23 July 2013 at 21.51 (POL00040001); and Draft update to the Board regarding Horizon Legal Issues dated 22 July 2013 (POL00040002)

<sup>46</sup> See for example Email from Martin Smith to Rodric Williams dated 10 July 2013 at 14.18 (POL00297588)

<sup>47</sup> Email from Andy Parsons to Rodric Williams dated 22 July 2013 at 14.02 (POL00297873)

Witness: Rodric David Alun Williams  
Statement Number: WITN08420100  
Exhibits: None  
Date: 11 March 2024

issues were being dealt with at the same time and there was overlap between the two, as POL was trying to ensure a joined up approach. It may be most helpful to the Inquiry, however, if I deal with questions relating to each issue in turn. I will first briefly introduce each issue, and then address it in greater detail under its own heading below.

67. In short, after the Second Sight Interim Report the main change to the approach to criminal prosecutions and past convictions was that prosecutorial work was paused while POL's external criminal lawyers, Cartwright King, carried out a review of past convictions in order to ensure that POL complied with its duties of disclosure as a prosecutor (referred to as the "**Sift Review**"). I discuss my involvement in that process in Part 4.1 below (paragraphs [73] to [75]). POL's prosecution policy was also redrafted with the advice of external counsel (see Part 4.1, paragraph [93] below).
68. Similarly, after the Second Sight Interim Report the approach taken to resolving cases that Second Sight had been investigating, along with similar complaints, shifted to the 'Initial Complaint Review and Mediation Scheme' (the "**Scheme**"), which had been developed by POL, Second Sight and the JFSA. The idea behind the Scheme was that PMRs would submit their complaints to the Scheme through written applications articulating their concerns, which POL would then review and report on through a Post Office Investigation Report ("**POIR**"). This material would then be passed to Second Sight, who would make their own assessment of the complaint and POL's report and recommend whether they thought the issues were capable of resolution through

Witness: Rodric David Alun Williams  
Statement Number: WITN08420100  
Exhibits: None  
Date: 11 March 2024

mediation.<sup>48</sup> I deal with the Scheme, along with issues that arose in connection with it, in Part 4.2 below (paragraphs [94] to [101] and [115] to [123]). Part 4.2 will also deal with the decision to instruct Linklaters for legal advice in connection with POL's contract with PMRs and the subsequent instruction of Deloitte (paragraphs [102] to [114] below).

*Regular Conference Call*

69. The Inquiry has shown me an email concerning a regular Horizon conference call which was set up between POL and its external lawyers in response to the Interim Report.<sup>49</sup> My recollection is that the purpose behind the calls was for issues with Horizon to be raised and recorded so there would be visibility of them across the business and to avoid operating in silos. I also recall that POL's external criminal lawyers were keen to have these calls so as to create a record of Horizon issues which they could consider for disclosure in prosecutions. I believe this position is reflected in an email I sent on 12 July 2013 to John Scott, POL's Head of Security, who would be leading the calls.<sup>50</sup> Below at [81] I address the concerns raised by Simon Clarke regarding allegations that material relating to these calls was destroyed. As I note there, my understanding was that these meetings were intended to be and were minuted so as to ensure there was visibility amongst the business of any Horizon issues.
70. I have no reason to believe the minutes taken of these weekly calls did not fairly reflect the discussions that took place. The Inquiry has asked me if there were

---

<sup>48</sup> I believe details of this are more fully described in Post Office Complaint Review and Mediation Scheme ("**End of Term Report**") (POL00040935)

<sup>49</sup> Email from John Scott to Susan Crichton dated 14 August 2013 at 07.39 (POL00139690)

<sup>50</sup> Email from Rodric Williams to John Scott dated 12 July 2013 at 17.34 (POL00191968)

Witness: Rodric David Alun Williams  
Statement Number: WITN08420100  
Exhibits: None  
Date: 11 March 2024

discussions regarding whether notes should be taken and, if so, in what format. As I mentioned above, my understanding is that the very purpose of these meetings was to ensure that issues with Horizon were raised and recorded, so keeping a record in minutes was always seen as important.

71. I do not recall contributing much to the calls, which largely seemed to focus on operational issues. I do not recall attending the first two calls the Inquiry has asked about as I was on annual leave.<sup>51</sup> The Inquiry has asked me to comment on the minutes taken of the call held on 31 July 2013.<sup>52</sup> I do not now recall that call, but have no reason to believe that the minutes would not fairly reflect its content.

#### **PART 4.1: PROSECUTION AND REVIEW OF CRIMINAL CASES FOLLOWING THE SECOND SIGHT INTERIM REPORT**

##### Cartwright King advice and the Second Sight Interim Report

72. The Inquiry has asked me about a number of pieces of advice that were given to POL by Cartwright King immediately before, and then following, the publication of the Second Sight Interim Report. As I set out at paragraph [25] above, I had no background in criminal law and was therefore relied on specialist legal advice in respect of matters relating to criminal prosecutions.

##### *Cartwright King 'Sift Review'*

73. Shortly before Second Sight published their Interim Report I became aware from activity taking place in the in-house legal team that the Interim Report, and

---

<sup>51</sup> Note of Regular Call regarding Horizon issues dated 19 July 2013 (POL00083932); and Note of Regular Call regarding Horizon issues dated 24 July 2013 (POL00083933)

<sup>52</sup> Note of Regular Call regarding Horizon issues dated 31 July 2013 (POL00083934)

Witness: Rodric David Alun Williams .....  
Statement Number: WITN08420100 .....  
Exhibits: None .....  
Date: 11 March 2024

in particular its discussion of two bugs in Horizon, had raised a significant issue for POL's prosecution activities which needed to be addressed, as those conducting the prosecution did not seem to be aware of the bugs.

74. The Inquiry has asked me to comment on an email I sent to Simon Clarke and Martin Smith of Cartwright King on 5 July 2013, shortly before the publication of the Second Sight Interim Report.<sup>53</sup> This refers to a summary of all Spot Reviews and the underlying source documents. I recall that WBD had created a "Spot Review Bible" to collate information on Spot Reviews in one place. Spot Reviews were provided to Cartwright King so that they could consider this material when advising POL, in the same way and for the same reasons as the 'local suspense bug' information referred to in paragraph [49] above.
75. Cartwright King advised that in light of the Interim Report it was necessary for POL to carry out a review of past convictions (i.e. the Sift Review referred to at paragraph [67] above) in order for POL to comply with its duties of disclosure as a prosecutor. Cartwright King then proceeded to carry this out. I was aware of the process the Sift Review would follow having been sent the protocol for it on 13 July 2013, and I recall reading one or two reports on particular prosecutions to get a feel for Cartwright King's work. I could not and did not express a view on the substance however, and I do not recall having any direct involvement in the Sift Review beyond seeking updates on it from time to time. Brian Altman KC subsequently carried out his own review of the Sift Review, which I discuss at paragraphs [83] to [84] and [87] to [88] below.

---

<sup>53</sup> Email from Rodric Williams to Martin Smith and others dated 5 July 2013 at 11.22 (POL00062162)



Witness: Rodric David Alun Williams  
Statement Number: WITN08420100  
Exhibits: None  
Date: 11 March 2024

76. The Inquiry has asked for my views on a specific piece of advice provided by Simon Clarke of Cartwright King, which appears to be a product of the Sift Review, albeit from May 2014. The advice concerns disclosure in light of the case of *R v Hosi*.<sup>54</sup> I do not think I have seen this advice previously, and could not find a record of having been sent it. However, it appears to show that Cartwright King were considering whether the Helen Rose report or Second Sight Interim Report ought to be disclosed to convicted PMRs. As I cannot recall seeing this advice previously, and was not involved in the detail of the Sift Review process, I cannot say whether disclosure was made as advised by Cartwright King. My recollection generally, however, is that POL acted consistently with the disclosure advice given by Cartwright King.

*8 July 2013 Advice from Simon Clarke*

77. I have been referred to another piece of advice from Simon Clarke dated 8 July 2013.<sup>55</sup> I can see from my emails that the 8 July 2013 advice was provided in response to an email Hugh Flemington sent to Simon Clarke and Martin Smith at Cartwright King that day, to which I (among others) was copied. Although I cannot specifically recall reading it, it is very likely that I did. I do not now recall having any views on it, and note that the issues discussed would have been for POL's criminal lawyers to take forward.

---

<sup>54</sup> Simon Clarke Case Review of *R v. Hosi* dated 1 May 2014 (POL00133638)

<sup>55</sup> Simon Clarke 'General Advice' dated 8 July 2013 (POL00006365)

Witness: Rodric David Alun Williams  
Statement Number: WITN08420100  
Exhibits: None  
Date: 11 March 2024

*10 and 11 July 2013 Advice on the Helen Rose report*

78. I have been asked to comment on an email chain of 10 and 11 July 2013.<sup>56</sup> This followed on from my sending to Cartwright King the Helen Rose report referred to above at [56] to [57], which I understood she had prepared in that form so she could take legal advice on the implications of her findings. I asked Cartwright King whether the Helen Rose report attracted privilege and what information needed to be disclosed. Cartwright King's advice as specialist criminal lawyers was that the information in the Helen Rose report was disclosable in criminal proceedings. My response was to accept this and request that they disclose all the information required, which they were best placed to take forward. In this context, I was seeking clarification from Cartwright King about how legal professional privilege might operate in criminal proceedings, with which I was not familiar. I was not seeking to withhold information in the Helen Rose report from inspection and specifically asked for it to be disclosed.
79. I had no informed basis then, and still have none now, on which to express a view on the criminal law advice received from Cartwright King<sup>57</sup> about whether the Helen Rose report undermined Gareth Jenkins as an expert witness in criminal proceedings.

---

<sup>56</sup> Email from Rodric Williams to Martin Smith and others dated 11 July 2013 at 14.19 (POL00066789)

<sup>57</sup> Simon Clarke 'Advice on the use of expert evidence relating to the integrity of the Fujitsu Services Ltd Horizon System' dated 15 July 2013 (POL00040000)

Witness: Rodric David Alun Williams  
Statement Number: WITN08420100  
Exhibits: None  
Date: 11 March 2024

*15 and 19 July 2013 Simon Clarke advice*

80. The Inquiry has asked me to comment on two further pieces of advice provided by Simon Clarke on 15 and 19 July 2013.<sup>58</sup> I was away on annual leave at the time these pieces of advice were received but was, I believe, sent them on or around the time they were prepared. I do not now recall anything specific about the 19 July 2013 advice, but I am likely to have found it useful information. I do however recall the 15 July 2013 advice raised Cartwright King's serious concerns about evidence which Gareth Jenkins had provided in prosecutions. I believe however that those concerns would have been taken forward as appropriate by POL's criminal lawyers and recall there being a general consensus following this advice that Gareth Jenkins could no longer be used as a witness in criminal proceedings.

*2 August 2013 Simon Clarke advice*

81. On 2 August 2013, Simon Clarke provided further advice on document retention.<sup>59</sup> As far as I can recall this was the first time I became aware of any suggestions about the "shredding" of notes from weekly conference calls. I do not know who made that suggestion. It certainly was not me and I was deeply concerned by it. I assisted Susan Crichton in drafting a response to the Simon Clarke advice.<sup>60</sup> This expressed POL's concern about the suggestion that an attempt had been made to destroy material associated with the Horizon weekly

---

<sup>58</sup> Simon Clarke 'Advice on the use of expert evidence relating to the integrity of the Fujitsu Services Ltd Horizon System dated 15 July 2013 (POL00040000); and Simon Clarke 'Compensation for Miscarriages of Justice' dated 19 July 2013 (POL00006800)

<sup>59</sup> Simon Clarke 'Disclosure: The Duty to Record and Retain Material' dated 2 August 2013 (POL00006799)

<sup>60</sup> Email from Rodric Williams to Susan Crichton dated 16 August 2013 at 11.38 (POL00193605)

Witness: Rodric David Alun Williams  
Statement Number: WITN08420100  
Exhibits: None  
Date: 11 March 2024

calls (discussed further in paragraphs [69] to [71] above) and confirmed that minutes would continue to be taken and stored.

### Initial CCRC Engagement

82. The CCRC first contacted POL on 12 July 2013, after the publication of the Second Sight Interim Report.<sup>61</sup> I have been asked to comment on an email sent by Susan Crichton to Andy Parsons on 16 July 2013 regarding advice that Cartwright King had given to POL on its response to the CCRC's initial letter. I was on leave at that time so did not get involved, but I am aware that the outcome was that POL decided to take further advice on how to respond, which led to Brian Altman KC being approached (discussed at paragraph [83] below). As far as I can recall, the action POL took following the CCRC letter of 12 July 2013 is reflected in the correspondence between POL and the CCRC that has been provided to me by the Inquiry.<sup>62</sup> I discuss the engagement I later had with the CCRC at paragraphs [154] to [155] and [158] to [166] below.

### Brian Altman KC Advice

83. As mentioned above, Brian Altman KC was initially approached following POL's receipt of the 12 July 2013 initial letter from the CCRC and, as well as advising POL on the CCRC, was asked to provide an interim review of the "Sift Review".<sup>63</sup> As I do not recall contributing to the terms of reference to which Brian

---

<sup>61</sup> Letter from Criminal Cases Review Commission ("CCRC") to Paula Vennells dated 12 July 2013 (POL00039994)

<sup>62</sup> Correspondence bundle between CCRC and POL dated between 15 July 2013 and 5 June 2014 (POL00040813); and Letter from Chris Aujard on behalf of POL to CCRC dated 5 June 2014 (POL00124350)

<sup>63</sup> Email from Gavin Matthews to Susan Crichton and others dated 9 August 2013 at 15.36 (POL00021980); Brian Altman KC Observations on Terms of Reference dated 2 August 2013 (POL00021981); and Draft Terms of Reference for the Appointment of Brian Altman QC (POL00021982)

Witness: Rodric David Alun Williams  
Statement Number: WITN08420100  
Exhibits: None  
Date: 11 March 2024

Altman KC's advice responded, I cannot comment on why POL decided to ask him to advise on the 'efficacy' rather than the 'safety' of convictions, or what the distinction between those words may be. I also cannot comment on how the time period covered by Brian Altman KC's review came to be set, although I believe from subsequent discussions that the 2010 cut-off related to the timing of the upgrade from Horizon Legacy to Horizon Next Generation or HNG:X, when as part of the upgrade each Post Office branch underwent a physical cash and stock check which balanced each branch's account, effectively resetting it on the new system.

*Brian Altman KC's Interim Review of Cartwright King's Current Process*

84. Brian Altman KC provided his 'Interim Review of Cartwright King's Current Process' on 2 August 2013.<sup>64</sup> That review was provided to Cartwright King, who produced a response on 13 August 2013.<sup>65</sup> Cartwright King addressed some of the concerns that Brian Altman KC had raised, and suggested that a joint conference would be useful to ensure that the Sift Review of criminal convictions was effective. The Cartwright King response was sent to Susan Crichton, with a request that it be sent to Brian Altman KC along with the Sift Review Protocol that Cartwright King had created<sup>66</sup> and Simon Clarke's advice of 2 August 2013 on disclosure (referred to at paragraph [81] above).<sup>67</sup>

---

<sup>64</sup> Brian Altman KC 'Interim Review of Cartwright King's Current Process dated 2 August 2013 (POL00006583)

<sup>65</sup> Cartwright King 'Response to the Interim Review of Cartwright King's Current Process by Brian Altman QC' dated 13 August 2013 (POL00066807); and Email from Susan Crichton to Rodric Williams dated 16 August 2013 at 09.15 (POL00006578)

<sup>66</sup> Cartwright King 'Initial Sift Protocol' (POL0012945 2)

<sup>67</sup> Simon Clarke 'Disclosure: The Duty to Record and Retain Material' dated 2 August 2013 (POL00006799)



Witness: Rodric David Alun Williams  
Statement Number: WITN08420100  
Exhibits: None  
Date: 11 March 2024

*Conference of 9 September 2013 with Brian Altman KC*

85. The Inquiry has asked me to comment on two notes of the conference with Brian Altman KC that took place on 9 September 2013.<sup>68</sup> I do not recall these notes, but it is possible that they were sent to me at or around the time they were made. The first note was clearly taken by WBD. Although I recall attending Brian Altman KC's chambers on several occasions, I do not have any recollection of this conference specifically. Given the other attendees, I am likely to have attended to continue to make sure the actions being taken were "joined up" within POL, and that I could take forward any that might apply to me. I have no reason to think that the notes of the conference do not reflect what happened or omitted any material matter discussed. Since I have no clear recollection of the conference, I cannot add anything regarding what was said about any of the specific points mentioned in the two notes.

*Conference of 4 October 2013 with Brian Altman KC*

86. I have been asked by the Inquiry for my recollection of a conference held with Brian Altman KC on 4 October 2013. I do not now have any specific recollection of this conference either, and, although I can see it in my diary, my emails from around the time suggest I may have been occupied with another matter and asked someone else to step in. In any event, it seems that this was a telephone conference call to assist Brian Altman KC complete his advice, by giving him an opportunity to discuss a number of the actions identified at the 9 September 2013 conference with Cartwright King and WBD.

---

<sup>68</sup> Bond Dickinson 'Notes of Conference with Brian Altman QC' dated 9 September 2013 (POL00006485); and 'Note of Meeting with BAQC' dated 9 September 2013 (POL00139866)

Witness: Rodric David Alun Williams  
Statement Number: WITN08420100  
Exhibits: None  
Date: 11 March 2024

*Brian Altman KC's backward-looking Review of Prosecutions*

87. I have been referred to the 'Review of Prosecutions' that Brian Altman KC completed on 15 October 2013, which was emailed to me by Gavin Matthews that day.<sup>69</sup> This was a "backwards-looking" review (as opposed to the "forward-looking" review Brian Altman KC later produced, which focused on what any future POL prosecutions might look like). The 15 October 2013 review commented on the Sift Review, and also proposed measures to control the collation and future dissemination of information about Horizon issues. Recognising the importance of this advice, I will have read it on or shortly after receiving it. Like others, I will have taken comfort from it that the approach POL was taking was sound, and that the appropriate people in and advising POL had access to the advice to take its actions forward.
88. My attention has been drawn by the Inquiry to paragraph [64], [70], and [71] of the advice. These appear to relate to the time period covered by Brian Altman KC's review. I cannot add anything to what I have said at paragraph [83] above. In relation to paragraph [130] of the advice, I only add to what I have already said above at paragraphs [44] to [45] above in relation to the Callendar Square bug that the advice suggested it was no longer an issue having been fixed but might still need to be considered if the issue surfaced through the Scheme. Paragraph [129] of the advice accords with what I recall about Brian Altman KC's advice at paragraph [120] below. Consistent with this advice, and the approach we were generally trying to take at POL of 'joining up' the legal experts

---

<sup>69</sup> Brian Altman KC 'Post Office Ltd: General Review' dated 15 October 2013 (POL00006581); and Email from Gavin Matthews to Hugh Flemington and others on 15 October 2013 at 17.45 (POL00040041)

Witness: Rodric David Alun Williams  
Statement Number: WITN08420100  
Exhibits: None  
Date: 11 March 2024

with the work being undertaken to understand PMRs' complaints about Horizon, Cartwright King was involved in reviewing every application and POIR produced for the Scheme.

*Board update of October 2013 in Respect of Brian Altman KC's advice*

89. I can see from documents provided by the Inquiry that in October 2013 I was approached by Martin Edwards (POL Chief of Staff) to comment on some text relating to Brian Altman KC's review that he intended to include in a report he was preparing. I duly did this, explaining the basis for the amendments I suggested be made.
90. I have been asked when the Board was made aware of the Helen Rose report. I do not know what the Board had been told about this report before October 2013.<sup>70</sup> Board papers were not generally shared with me in those days and I did not attend Board or Executive Committee meetings.<sup>71</sup> I have been asked to comment on why I said in an email to Martin Edwards on 24 October 2013 that *"it is sensible to keep references to the Helen Rose Report [to] a minimum as it may not be a live issue going forward"*.<sup>72</sup> The email chain shows that I worked with Martin Edwards to provide the information he needed for his purposes, which I understood to be a short summary that he was intending to include in a larger report also addressing other issues. In that context, I felt that the references to the Helen Rose Report (which I appear to have introduced in my first round of comments on the draft summary) could be kept to a minimum,

---

<sup>70</sup> Email from Rodric Williams to Martin Edwards dated 24 October 2013 at 10.30 (POL00108163); and Email from Martin Edwards to Belinda Crowe dated 28 October 2013 at 15.47 (POL00108161)

<sup>71</sup> I do not believe I saw the document 'Chief Executive's Report' on Project Sparrow dated 24 October 2013 (POL00108162) contemporaneously.

<sup>72</sup> Email from Rodric Williams to Martin Edwards dated 24 October 2013 at 10.30 (POL00108163)

Witness: Rodric David Alun Williams  
Statement Number: WITN08420100  
Exhibits: None  
Date: 11 March 2024

particularly in light of the external criminal law advice received around it, which I also noted in the email.

*Brian Altman KC's forward-looking Review of Post Office Ltd Prosecution Role*

91. Brian Altman KC provided his 'Review of Post Office Ltd Prosecution Role' on 19 December 2013,<sup>73</sup> finalising a draft he had shared in October 2013.<sup>74</sup> As with his "backward-looking" advice, I am likely to have read this at the time I received the draft, or shortly afterwards. This was "forward-looking advice", considering the future of POL's prosecution role and revisions to its prosecution policy.
92. The Inquiry has asked me to comment on Brian Altman KC's statement that "[t]he Horizon data integrity issue was an exceptional instance of Post Office Ltd prosecutorial failure of serial non-disclosure in breach of Post Office Ltd's disclosure obligations". I understood this to refer to disclosure failures identified by Simon Clarke in his 15 July 2013 advice note, referred to at [80] above.<sup>75</sup> I understood from paragraph, 5(iv) of document **POL00112937** that Brian Altman KC's view was that POL had, since the failings he identified, taken appropriate steps to remedy the situation, and had (or would) put in place processes to ensure that such failures were not repeated if any future prosecutions took place. I had no informed basis then, and still have no informed basis now, for expressing a view on whether POL should continue to act as a prosecutor in

---

<sup>73</sup> Brian Altman KC 'Post Office Ltd: Review of Post Office Ltd Prosecution Role' dated 19 December 2013 (**POL00112937**)

<sup>74</sup> Brian Altman KC draft 'Post Office Ltd: Review of Post Office Ltd Prosecution Role' dated 21 October 2013 (**POL00038592**)

<sup>75</sup> Simon Clarke 'Advice on the use of expert evidence relating to the integrity of the Fujitsu Services Ltd Horizon System' dated 15 July 2013 (**POL00040000**)

Witness: Rodric David Alun Williams  
Statement Number: WITN08420100  
Exhibits: None  
Date: 11 March 2024

private prosecutions, and I do not recall ever being formally asked for my views on this.

93. I was later asked to assist in coordinating, with the help of external lawyers, material for POL senior management about what a new prosecution policy could look like. This was done in conjunction with external lawyers and internal POL Legal colleagues, on the premise that POL would resume undertaking prosecutions. However, as far as I am aware, POL did not resume routine prosecutions.<sup>76</sup>

#### **PART 4.2 MEDIATION SCHEME AND RELATED MATTERS**

##### **Setting up of the Scheme and Process**

94. Although paragraph 8.2(a) of Second Sight's Interim Report stated that: "*we have so far found no evidence of system wide (systemic) problems with the Horizon software*", (see paragraph [62] above), their work did not resolve the individual complaints from PMRs which they had been considering, or other similar complaints that could come forward. POL therefore sought to address and resolve the complaints through the introduction of the Scheme. People with a range of skills were asked to be involved in the Scheme, including with respect to operational matters around how Post Office branches work. Initially, there was significant optimism that the Scheme, which had been developed with Second Sight and the JFSA, could help to resolve the PMRs' complaints, albeit that many of these had not yet been articulated to, or looked into by, POL.

---

<sup>76</sup> I understand a few prosecutions took place where the evidence of criminal offending was completely independent of Horizon.



Witness: Rodric David Alun Williams  
Statement Number: WITN08420100  
Exhibits: None  
Date: 11 March 2024

95. I do not recall having a specific role within the team managing the overall conduct of the Scheme, but I was available to them, as a member of POL legal, to provide such support as they or the external lawyers supporting them might require. I would also occasionally review specific pieces of work (e.g. POIRs or Second Sight reviews relating to particular complaints) to get a feel for what they looked like and how they were being dealt with to make sure they would support the Scheme's aims.
96. The Scheme was supervised by a "Working Group", chaired by a retired Court of Appeal (Criminal Division) judge, Sir Anthony Hooper. The Working Group was composed of representatives from Second Sight, the JFSA and POL. The POL contingent was led by POL's then interim General Counsel, Chris Aujard, and its secretariat was provided by Belinda Crowe (who was, I understood, essentially POL's Scheme director). Although I believe I attended several early Working Group meetings by telephone conference when the Scheme was being established, I only recall attending one in-person Working Group meeting once the Scheme was up-and-running.<sup>77</sup>
97. WBD were instructed to provide the main legal support for the Scheme, consistent with the general approach referred to at paragraphs [23] and [24] above of POL using external legal support for large, long-running and/or complex matters. As noted at paragraph [88] above, Cartwright King were involved in reviewing every application and POIR produced for the Scheme so

---

<sup>77</sup> Notes of call of Working Group for Initial Complaint Review and Mediation Scheme ("**Notes of Working Group call**") dated 31 October 2013 (**POL00043641**); Notes of Working Group call dated 14 November 2013 (**POL00043623**), Notes of Working Group call dated 28 November 2013 (**POL00043624**); Notes of Working Group call dated 5 December 2013 (**POL00043625**); and Notes of Working Group call dated 12 December 2013 (**POL00026666**)

Witness: Rodric David Alun Williams  
Statement Number: WITN08420100  
Exhibits: None  
Date: 11 March 2024

they could identify any criminal law issues that might arise and were engaged to provide specific criminal law input when this was required.

#### *Legal Support for PMRs*

98. The Inquiry has asked me to explain how POL decided to offer Scheme applicants £1,500 excluding VAT to pay for professional advisers in relation to the Scheme.<sup>78</sup> I do not recall how this decision was reached or who ultimately signed it off. I assume it was a commercial decision, having regard to considerations such as a range of possible adviser hourly rates. Financial support was also available for preparing for and attending a mediation (at £750 plus VAT for a half day or £1,250 plus VAT for a full day). POL did recognise that a Scheme applicant might incur further costs and, as far as I am aware, POL always intended to keep an open mind about such costs as they might need to be addressed in order to resolve individual cases. It also appears from the Working Group document referred to me by the Inquiry entitled 'Key points and actions from the conference call at 1pm on 5 December 2013' that the Working Group agreed that additional funding could be applied for in exceptional circumstances.<sup>79</sup> Although I am recorded as having attended that call, I have no specific recollection of it.

#### *Second Sight Reports for the Mediation Scheme*

99. As I explained at paragraph [68] above, as part of the Scheme Second Sight would make their own assessment of the complaint and POL's POIR report into it. The Inquiry has asked me to consider an email chain from March 2014 which

---

<sup>78</sup> Notes of Working Group call dated 5 December 2013 (POL00043625)

<sup>79</sup> Notes of Working Group call dated 5 December 2013 (POL00043625)

Witness: Rodric David Alun Williams  
Statement Number: WITN08420100  
Exhibits: None  
Date: 11 March 2024

I believe relates to the report Second Sight prepared for the Scheme about the *Castleton* case.<sup>80</sup> I had limited direct engagement with Second Sight, but to the best of my recollection the concerns expressed in this email reflect the concerns of those within the Scheme team about Second Sight's work, namely that Second Sight would make statements without setting out the reasoning or the evidence on which they were based (which was similar to POL's concerns about the Interim Report). They would also comment, sometimes quite stridently, on matters outside their areas of expertise, such as criminal law, and did not seem to reflect POL's position as explained in the POIR so as to present a balanced account. Ultimately though, there was little that POL could do about these concerns beyond raising them with Second Sight, given that Second Sight were acting independently of POL.

*Issue of Remote Access in the context of the Mediation Scheme*

100. The Inquiry has asked me to comment on some emails showing that advice was taken on whether, and in what form, to disclose the Helen Rose report to applicants to the Scheme.<sup>81</sup> As far as I can tell, the position adopted by POL was to follow the advice and disclose the report.
101. The Inquiry has also asked me to comment on an email sent to Andy Parsons on 22 April 2014 concerning an internal POL email from 2008.<sup>82</sup> As far as I can tell, I first saw the 2008 internal POL email when I was sent it on 14 April 2014

---

<sup>80</sup> Email from Andy Parsons to Chris Aujard and others dated 6 March 2014 at 18.19 (**POL00074462**)

<sup>81</sup> Email from Andy Parsons to Belinda Crowe and others dated 8 April 2014 at 20.42 (**POL00029707**); Email from Pete Newsome to James Davidson and others dated 19 May 2014 at 18.05 (**FUJ00087119**); and Email from Andy Parsons to Belinda Crowe and others dated 14 April 2014 at 14.00 (**POL00108424**)

<sup>82</sup> Email from Andrew Winn to Alan Lusher dated 23 October 2008 at 12.46 (**POL00023432**); and Email from Rodric Williams to Andy Parsons dated 22 April 2014 at 12.04 (**FUJ00087119**)

Witness: Rodric David Alun Williams  
Statement Number: WITN08420100  
Exhibits: None  
Date: 11 March 2024

in the context of a Scheme claim. The email raised the issue of remote access (albeit in a different manner from the way remote access was raised by Michael Rudkin, mentioned at paragraphs [53] to [54] above). I discussed this with Andy Parsons, who drew out for me the questions it raised for POL but which Fujitsu would need to answer.<sup>83</sup> These questions were then sent to Fujitsu, whose responses were provided to me on 17 April 2014 and, I believe it was relayed to Second Sight. I believe that the question of how, and to what extent, Fujitsu had the ability to alter Post Office branch data remotely continued be explored with Fujitsu, but I do not now recall the details of what was done at this particular time. I assisted in providing an interim answer to this question in May 2014, based on what I had been told by Fujitsu's subject matter experts,<sup>84</sup> and a more detailed explanation was completed by Andy Parsons in late 2014 for confirmation by Fujitsu.<sup>85</sup> I do not recall considering at that time whether criminal law advice should be taken around whether this information needed to be disclosed, but I believe that such advice was sought from Cartwright King and Brian Altman KC when the issue arose again in mid-2015 in connection with the "Part Two" Report Second Sight was preparing as part of the Scheme. This is addressed further below at [148] to [149].

---

<sup>83</sup> Email from Andy Parsons to Rodric Williams dated 14 April 2014 at 13.22 (POL00303716)

<sup>84</sup> Email from Andy Parsons to Angela van den Bogerd dated 9 May 2014 at 15.01 (POL00304478)

<sup>85</sup> Email from Andy Parsons to Belinda Crowe and others dated 10 November 2014 at 16.44 (POL00212048)

Witness: Rodric David Alun Williams  
Statement Number: WITN08420100  
Exhibits: None  
Date: 11 March 2024

Instruction of Linklaters And Deloitte

*My involvement with the instruction of Linklaters in April 2014*

102. I do not know precisely when or how POL decided to seek advice about the Scheme from Linklaters, but in March 2014 POL's Scheme team and Chris Aujard asked me to assist in getting Linklaters to provide advice to POL's Board on the legal claims and potential financial exposures raised by the claims made under the Scheme. My role in this was to help provide information to Linklaters to enable them to provide that advice, and work with them to produce a report which would be comprehensible and useful for the Board.

103. I am sure I reviewed and commented on the Linklaters report into the legal issues with the Scheme when it was received.<sup>86</sup> I believe that **POL00107317** was the final version of the Linklaters report, but I cannot be sure, as I was not responsible for sharing the final advice with the Board, and further amendments may have been made before it was sent to them. For completeness I have seen an email in which I forwarded **POL00107317** to two colleagues in the POL legal team for their information as it may have been relevant to their work. I do not know who else received the Linklaters report at this time, and I did not attend the Board meeting at which it was discussed.<sup>87</sup>

---

<sup>86</sup> Linklaters 'Report into Initial Complaint Review and Mediation Scheme: Legal Issues' dated 20 March 2014 (**POL00107317**)

<sup>87</sup> At this time, I did not attend Board meetings or receive the document packs prepared for them, and would typically only see extracts from the minutes of the meetings if I specifically asked for them.



Witness: Rodric David Alun Williams  
Statement Number: WITN08420100  
Exhibits: None  
Date: 11 March 2024

104. I do not recall having any substantive input into the papers produced by Linklaters around the future of the Scheme, which the Inquiry has shared with me.<sup>88</sup>

*My involvement with the instruction of Deloitte*

105. As with the instruction of Linklaters, I do not recall precisely when or how POL decided to instruct IT specialists at Deloitte. I became aware of the decision when, around early April 2014, I was asked to help agree the terms of Deloitte's engagement. I understood that the aim was for Deloitte to provide an objective report into the reliability of Horizon along the lines recommended by Linklaters in their recent advice. This could enable Linklaters to advise further, and assist the Board in considering Scheme-related legal risks and financial liabilities.<sup>89</sup> Although I could assist in documenting Deloitte's engagement, I would not have engaged in detail with the substance of their work because I did not and do not have the technical expertise to do so.

106. I do not recall who or how the scope of the instruction to Deloitte was determined but, given the potential scale of the task it was likely to be an iterative process undertaken in stages, the first of which was a 'desktop' review of the available documentation dealing with the operational controls around Horizon that should ensure it was processing transactions reliably. That is my understanding of why POL initially did not require Deloitte to *"comment on or test the quality of the assurance work performed, nor opine on its adequacy,*

---

<sup>88</sup> Linklaters 'Preliminary note on the future of the Mediation Scheme' dated 31 March 2014 (POL00022117); and Presentation 'Initial Complaint and Mediation Scheme: The Way Forward' (POL00022109)

<sup>89</sup> Email from Rodric Williams to Gareth James dated 2 April 2014 at 17.57 (POL00117519)

Witness: Rodric David Alun Williams  
Statement Number: WITN08420100  
Exhibits: None  
Date: 11 March 2024

*sufficiency or conclusions*”, which I understood would amount to an audit of the audit processes used, rather than a review of the assurance work itself. The same applies to Deloitte not being required to comment on *“the integrity of the Horizon HNG-X processing environment (nor the legacy Horizon system)”*, which I understood was initially out of scope so that Deloitte’s preliminary review could start with the assurance environment before turning to its actual operation.

107. There was an impetus to proceed quickly, and I recall that, as well as Chris Aujard and Belinda Crowe, Lesley Sewell was involved in signing off the Deloitte engagement letter.<sup>90</sup> My role in this as a POL in-house lawyer included recording in the engagement letter the legal context in which the instruction was happening, so as to support any future claim of legal professional privilege that could be made over Deloitte’s work. As I mentioned at paragraph [105], Deloitte were instructed at the recommendation of Linklaters to inform Linklaters’ advice on the legal claims and potential financial exposures raised by the PMRs’ claims made under the Scheme, also bearing in mind that PMRs might sue POL over their allegations if mediation failed.

*My involvement with Deloitte’s Project Zebra reports*

108. Deloitte were independent experts<sup>91</sup> so my role in supporting their work was narrow. I helped them access the material they required, but otherwise left them

---

<sup>90</sup> Email from Gareth James to Rodric Williams and others dated 4 April 2014 at 16.20 (POL00108395), Email from Rodric Williams to Gareth James dated 4 April 2014 at 11.17 (POL00125760); and Email from Belinda Crowe to Rodric Williams and others dated 4 April 2014 at 08.31 (POL00117551)

<sup>91</sup> Deloitte ‘Project Zebra – Phase 1 Report (Draft – For validation in advance of Board discussion on Wednesday 30th April)’ (POL00105635) makes clear at paragraph 2 that they understood their brief to be *independently* producing reports.

Witness: Rodric David Alun Williams  
Statement Number: WITN08420100  
Exhibits: None  
Date: 11 March 2024

to get on with their work. Chris Aujard was I believe leading on the delivery of this work, with my responsibilities being to ensure Deloitte were on track, that any important issues were promptly identified and that their output, in particular the executive summaries, were clear and digestible for the target audience. Two email chains, dated 22-23 April 2014<sup>92</sup> provided to me by the Inquiry reflect the type of support I provided. Although I did not understand the technical matters being discussed, I was still able to facilitate the work of those who did.

109. The Inquiry has also asked me to comment on an email exchange I had with Mark Westbrook at Deloitte on 20 May 2014, which I explore in more detail in the section of my statement dealing with remote access at paragraph [145].<sup>93</sup>

110. The Inquiry has asked me to consider a number of draft Deloitte Project Zebra reports and draft Board updates.<sup>94</sup> My recollection of Deloitte's 'Project Zebra – Phase 1 Report: Draft'<sup>95</sup> was that it provide an overview of the work Deloitte had done so far and suggested some next steps. It prompted the Board to raise some specific questions with Deloitte in a Board meeting on 30 April 2014 (which I did not attend, but was sent brief minutes of), including seeking assurance over how Horizon recorded and maintained transaction logs, both pre- and post-2010.<sup>96</sup>

---

<sup>92</sup> Email from Rodric Williams to Mark Westbrook dated 22 April 2014 at 10.35 (POL00108443); and Email from Rodric Williams to Mark Westbrook dated 23 April 2014 at 14.32 (POL00108453)

<sup>93</sup> Email from Mark Westbrook to Rodric Williams dated 20 May 2014 at 12.44 (POL00029728)

<sup>94</sup> Deloitte 'Project Zebra – Phase 1 Report (Draft – For validation in advance of Board discussion on Wednesday 30th April)' (POL00105635); Deloitte 'HNG-X: Review of Assurance Sources – Discussion Areas re: Phase 2 (Draft - For Discussion only)' (POL00031384); Deloitte 'HNG-X: Review of Assurance Sources – Phase 1 – Board Update at 13/5/14' (POL00031391); and Deloitte 'HNG-X: Review of Assurance Sources - Board Update - As at 16/05/2014 (Draft)' (POL00029726)

<sup>95</sup> Deloitte 'Project Zebra – Phase 1 Report (Draft – For validation in advance of Board discussion on Wednesday 30th April)' (POL00105635)

<sup>96</sup> Email from Rodric Williams to Larissa Wilson dated 7 May 2014 at 14.37 (POL00304303)

Witness: Rodric David Alun Williams  
Statement Number: WITN08420100  
Exhibits: None  
Date: 11 March 2024

111. I assisted in defining the scope of instruction for the second phase of Deloitte's work. This was not easy as I had not attended the Board meeting which instructed this, but the scope was discussed on a call held early on 7 May 2014 which I attended with Lesley Sewell, Gareth James and others. I followed this call up with a "*starter-for-ten*' which aims to capture the essence of our call", which I emailed to POL and Deloitte colleagues shortly before a further call at 4.30pm the same afternoon. I appear to have sent a further draft following that call for Gareth's review before a final position was agreed on 9 May 2014.<sup>97</sup> This second phase of work was reflected in a Change Order,<sup>98</sup> reflecting the extension of Deloitte's work to demonstrating Horizon was operating with integrity and that the transition from the original Horizon Legacy to the current HNG-X had been properly managed. Deloitte then proceeded to draft a "HNG-X: Review of Assurance Sources Board Update",<sup>99</sup> which I received and commented on 18 May 2014, and then discussed with Gareth James at POL's office on 19 May 2014. The final report, "Desktop Review of Assurance Sources and Key Control Features – Draft for Discussion" dated 23 May 2014 (the "**May 2014 Deloitte Report**"), was released to POL on 26 May 2014.<sup>100</sup>
112. Once POL had received Deloitte's report, it was shared with Linklaters, who discussed it with Chris Aujard at a meeting I did not attend, before Chris Aujard emailed me to say the report may require "*a substantial re-write*". After speaking to Chris (I think by telephone), I relayed this to Deloitte and a proposed structure

<sup>97</sup> Email from Rodric Williams to Lesley Sewell and others dated 9 May 2014 at 14.12 (POL00138314)

<sup>98</sup> Deloitte 'Change Order Number 1, v 2' dated 6 May 2014 (POL00117612)

<sup>99</sup> Deloitte 'HNG-X: Review of Assurance Sources - Board Update - As at 16/05/2014 (Draft)' (POL00029726)

<sup>100</sup> Deloitte 'Horizon: Desktop Review of Assurance Sources and Key Control Features - Draft for Discussion' dated 23 May 2014 (the "**May 2014 Deloitte Report**") (POL00028062)



Witness: Rodric David Alun Williams  
Statement Number: WITN08420100  
Exhibits: None  
Date: 11 March 2024

suggested by Linklaters for a “repackaged” report was sent to Deloitte on 29 May 2014.<sup>101</sup>

113. My role in relation to this further report is reflected in two email chains provided to me by the Inquiry.<sup>102</sup> There was frustration within POL about the speed and form of delivery of Deloitte’s work, which I believe Chris reflected in his email to Paula Vennells.<sup>103</sup> Essentially, there seemed to be a disconnect between POL and Deloitte over the how best to present their work. This I believe led to Chris asking Deloitte to synthesise from their work and findings a shortened “Board Briefing” focused on Horizon’s Core Audit Process.<sup>104</sup> I was asked by Chris Aujard to keep working with Deloitte on this, which involved a number of discussions (by telephone and most likely also in person) and exchanges of drafts with Deloitte. This sometimes involved the exchange of whole draft documents. At other times we might exchange specific extracts being discussed (I believe **POL00031408** is an example of this, whereby specific text would be cut and pasted into an email which could be considered in email format while being discussed).
114. I did not attend the Board meeting or meetings which considered Deloitte’s reports, and do not recall any specific actions arising out of them. Having reviewed my emails, I appear to have attended a call with Deloitte and POL IT and Internal Audit colleagues on 2 July 2014 to discuss next steps, with my

---

<sup>101</sup> Email Rodric Williams to Gareth James and others dated 29 May 2014 at 10:15 (**POL00204927**)

<sup>102</sup> Email from Chris Aujard on 29 May 2014 (**POL00031400**) and Email exchange between Gareth James and Chris Aujard on 29 May 2014 (**POL00031401**)

<sup>103</sup> Email from Chris Aujard to Paula Vennells and others dated 29 May 2014 at 18.35 (**POL00031400**); and Email from Gareth James to Chris Aujard dated 29 May 2014 at 19.28 (**POL00031401**)

<sup>104</sup> Which became Deloitte ‘Board Briefing: Document, further to our report “Horizon: Desktop review of assurance sources and key control features” dated 4 June 2014 (**POL00028069**)



Witness: Rodric David Alun Williams  
Statement Number: WITN08420100  
Exhibits: None  
Date: 11 March 2024

primary concern being the “balancing transactions” process identified by Deloitte (discussed further below). I do not know whether any aspect of this work was taken forward by other parts of the business, but I sought to get Deloitte’s permission to release the report to WBD and Cartwright King so that they could consider them as part of the support they were providing for POL.

#### The Mediation Scheme in mid-2014

##### *Second Sight's Thematic Review and Briefing Report Part 1*

115. I am aware that Second Sight produced two overarching reports in connection with the Scheme, although I do not recall the specific sequence of events that led to them. The first was the ‘Thematic Review and Briefing Report Part 1’ (sometimes called the “Part One” report) which set out various background matters concerning Post Office operations likely to arise from applications to the Scheme. These matters would not have been familiar to those without prior experience of the operation of Post Office branches (for example, someone providing professional advice to a Scheme applicant). I do not recall having any material input into the production of these documents, although I will have seen them around this time.

116. I would not have sufficiently interrogated the detail of either the “Thematic Issues Report” or “Briefing Report – Part One” to assess points raised in Andy Parsons’ emails and mark-ups, but because they were being raised directly with

Witness: Rodric David Alun Williams  
Statement Number: WITN08420100  
Exhibits: None  
Date: 11 March 2024

the POL Scheme team I would have no reason to think they would not be taken forward as appropriate.<sup>105</sup>

### *Changes to the Scheme*

117. As I explained at paragraph [96] above, the Scheme was administered by a Working Group, chaired by Sir Anthony Hooper and composed of representatives from Second Sight, PMRs and POL. I was not a member of the Working Group and my involvement with its meetings was early on when the Scheme was being established, and I only recall attending one in-person Working Group meeting once the Scheme was up-and-running. I am therefore not well placed to comment on changes to the Scheme or what led to them. The Inquiry has asked me to comment on an email from David Oliver circulating a briefing note for POL about the Working Group on 1 May 2014, which copied me and Andy Parsons of WBD.<sup>106</sup> I do not know why I was copied into this email and cannot recall reading the briefing note.

### *Reviewing the issue of criminal convictions within the Scheme*

118. The documents provided to me by the Inquiry show that POL had received advice from Brian Altman KC in 2013 about whether cases involving criminal prosecutions were suitable for mediation. This advice was given in the context

---

<sup>105</sup> Email from Andy Parsons to David Oliver and others dated 31 March 2014 at 20.53 (POL00006552); Marked-up version of Second Sight 'Draft - Thematic Issues Report' (POL00006553); Email from Andy Parsons to David Oliver and others dated 29 April 2014 at 15.09 (POL00006554); Second Sight 'Briefing Report- Part One' dated 25 July 2014 (POL00004439); and Marked-up version of Second Sight 'Branch Operating Procedures' dated 29 April 2014 (POL00006555).

<sup>106</sup> Email from David Oliver to Chris Aujard and others dated 1 May 2014 at 06.52 (POL00040153); and 'Post Office Briefing Note: Working Group' dated 1 May 2014 (POL00040154)

Witness: Rodric David Alun Williams  
Statement Number: WITN08420100  
Exhibits: None  
Date: 11 March 2024

of the Scheme being launched and various other issues relating to prosecutions that POL was looking into at the time.<sup>107</sup>

119. The Inquiry has asked me to comment on an email of 16 July 2014 to Chris Aujard, summarising advice that POL received in a further call with Brian Altman KC specifically in relation to the Scheme.<sup>108</sup> I believe this call arose because the Working Group was looking into whether applications involving criminal convictions should be mediated under the Scheme. It seems from my emails that Cartwright King had provided some advice that the POL Scheme team wanted to test, which I suggested be done with Brian Altman KC.<sup>109</sup> I do not now recall who else attended the call, but I sent my summary of it to Chris Aujard shortly afterwards on 16 July 2014. He was not able to attend the call but I believe would have wanted to know the outcome of it for his dealings with the Working Group.

120. Based on the call with Brian Altman KC, I understood his advice to POL to be that (bearing in mind Scheme cases were already being reviewed by criminal lawyers (see paragraphs [88] above)) there was a risk that things said or done at a mediation (e.g., an offer of compensation or even expression of regret) could in and of themselves be used to support an appeal against conviction. This would be “new” evidence in that it would not have been available at the

---

<sup>107</sup> Bond Dickinson ‘Notes of Conference with Brian Altman KC’ dated 9 September 2013 (POL00006485)

<sup>108</sup> Email from Rodric Williams to Chris Aujard dated 16 July 2014 at 21.44 (POL00061549); and Brian Altman KC ‘Post Office Ltd: Advice on Suggested Approach to Criminal Case Mediation’ dated 5 September 2014 (POL00006368)

<sup>109</sup> Email from David Oliver to Andy Parsons and others dated 15 July 2014 at 10.11 (POL00148709)

Witness: Rodric David Alun Williams  
Statement Number: WITN08420100  
Exhibits: None  
Date: 11 March 2024

time of the original prosecution, having only been created through a mediation taking place several years after that prosecution.

121. Brian Altman KC was later asked for written advice on this issue, and I can see from his note dated 5 September 2014<sup>110</sup> that he spoke with me and Gavin Matthews of WBD on 31 July 2014 about a proposal put forward by the Working Group Chair for dealing with Scheme applicants with a criminal conviction or caution. I presume this arose from a Working Group meeting which discussed the issue but which I do not believe I attended. My recollection is that the advice was in essence that the proposal did not mitigate the identified risks of mediating with Scheme applicants with convictions. The broad approach adopted by POL in light of this was to take three steps in relation to these PMRs: (a) provide them with the POIR for their case; (b) provide them with the Second Sight report for their case; and (c) confirm to them that POL would not be mediating with them.

*Emerging concerns about the Scheme*

122. While I was not close to the operation of the Scheme or Working Group dynamics, I do recall gathering from colleagues attending Working Group meetings that the Scheme was not functioning as well as hoped, seemingly due to a significant misalignment of expectations between some PMRs and POL regarding culpability for the events that had been raised and investigated, and what might be financially recoverable as a consequence. A wide range of monetary amounts were being sought (some very low and others very high),

---

<sup>110</sup> Brian Altman KC 'Post Office Ltd: Advice on Suggested Approach to Criminal Case Mediation' dated 5 September 2014 (**POL00006368**)

Witness: Rodric David Alun Williams  
Statement Number: WITN08420100  
Exhibits: None  
Date: 11 March 2024

some of the concerns were not clear, and POL was operating on an interpretation of its rights and responsibilities underpinned by Linklaters' advice.

123. This led I believe to PMRs becoming increasingly unwilling to engage with POL's position in the Working Group, and there were real concerns amongst the POL project team about the pace and consistency of the reviews being done by Second Sight.

**PART 5: SECOND SIGHT'S PART 2 REPORT AND MEDIATION SCHEME THEREAFTER**

*The draft Second Sight Part 2 Mediation Briefing Report*

124. The draft 'Second Sight Part 2 Mediation Briefing Report' (sometimes called the "Part Two" report) dated 30 July 2014 was a report produced by Second Sight to expand on common themes raised by PMR applicants to the Scheme now that a number of individual cases had been reviewed. I recall that the reaction to the draft from the POL Scheme team was that it raised matters that seemed to go beyond Second Sight's remit in the Scheme, and raised matters on which they did not agree and wanted to comment.<sup>111</sup> One area of perceived overreach was Second Sight's commentary on the standard postmaster contract. I was asked to forward the draft Part Two report to Linklaters for their support in responding to this issue on 1 August 2014.<sup>112</sup> I do not recall why Linklaters (as opposed to, say, WBD) was asked for support.

---

<sup>111</sup> Second Sight 'Initial Complaint Review and Mediation Scheme – Mediation Briefing Report: Part Two (Draft v 2) dated 30 July 2014 (POL00022150)

<sup>112</sup> Email Rodric Williams to Jonathan Swil dated 1 August 2014 at 16.16 (POL00022145)



Witness: Rodric David Alun Williams  
Statement Number: WITN08420100  
Exhibits: None  
Date: 11 March 2024

125. I was on annual leave between 4 and 12 August 2014. The documents provided to me by the Inquiry show that Linklaters gave their advice on 6 August 2014 and Belinda Crowe instructed WBD the same day to draft a letter to Second Sight regarding the draft Second Sight Part Two report, incorporating Linklaters' views as appropriate. I believe the letter was drafted on the basis that Chris Aujard would be the sender,<sup>113</sup> but he was away on his own annual leave by the time it was ready on 14 August 2014, so the final letter was sent in my name with a covering email noting that I was dealing with matters while he was away.<sup>114</sup> I was content to put my name to the final letter, having read a clean copy and satisfied myself of its content, as I knew it was the product of work between the POL team and supported by both Linklaters and WBD.
126. Second Sight proceeded to issue the final Part Two report to the Working Group on or about 21 August 2014. The POL Scheme team then raised their concerns about the Part Two report with the Working Group. I can see from documents I have reviewed that on 22 August 2014, the Chair of the Working Group decided that the Part Two report should be released to Scheme applicants "as drafted", with all parties, including POL, being able to write to applicants setting out their position on the report.

---

<sup>113</sup> WBD draft letter to Second Sight 'Post Office Response to Draft Part 2 Report' (POL00040209). I do not know the date of this draft.

<sup>114</sup> Letter from Rodric Williams to Second Sight 'Second Sight's Draft Part Two Mediation Briefing Report' dated 14 August 2014 (POL00022216); and Email from Belinda Crowe to Ron Warmington and others dated 14 August 2014 at 17.40 (POL000207439)

Witness: Rodric David Alun Williams  
Statement Number: WITN08420100  
Exhibits: None  
Date: 11 March 2024

*Sharing the Second Sight Part Two report*

127. The Second Sight Part Two Report was shared with Fujitsu upon receipt. The Inquiry has drawn my attention to the fact that three weeks later, on 15 September 2014, I shared it with Fujitsu again, along with POL's draft response.<sup>115</sup> It was POL's usual practice to share a report like this with the potentially affected stakeholders, and POL needed Fujitsu to answer questions about the technical functioning of Horizon raised by the Part Two report which POL could not answer internally. I asked Fujitsu to look specifically at these technical areas. Fujitsu shared its response with POL on 16 September 2014.<sup>116</sup> Its key concern was around the lack of evidence set out by Second Sight to back up the concerns they had raised. I shared the Fujitsu response with Andy Pheasant of WBD to get his views, but I cannot recall what the next steps were in relation to this.
128. The Inquiry has also asked me to comment generally on the relationship between POL and Fujitsu. I was aware that POL had a very substantial and commercially important relationship with POL, which extended beyond the PMR challenges about Horizon with which I was involved. Fujitsu seemed to have great confidence in Horizon, in particular its Core Audit Process, and seemed willing to provide to POL the information and support it asked for, and which POL needed given it did not have the internal expertise to provide. It is clear following the Horizon Issues trial that of some of that information did not

---

<sup>115</sup> Email from Rodric Williams to Michael Harvey dated 15 September 2014 at 15.39 (POL00021810)

<sup>116</sup> Fujitsu document 'Fujitsu's comments on Second Sight Briefing Report – Part Two' dated 15 September 2014 (FUJ00087174)

Witness: Rodric David Alun Williams  
Statement Number: WITN08420100  
Exhibits: None  
Date: 11 March 2024

withstand the scrutiny of the Group Litigation (an example being that concerning the Known Error Log discussed further at paragraphs [222] to [223] below).

*Information requested by Second Sight about suspense accounts*

129. It appears that around the time that Second Sight were publishing their draft Part Two report they made a request to POL concerning suspense accounts. I understood the basic issue to be that Second Sight wanted to understand whether POL may have taken branch shortfalls into its suspense accounts, but I do not recall where or how this issue came to be raised, or being substantively involved in POL's response to it.
130. The Inquiry has showed me an email chain dealing with Second Sight's request for suspense data.<sup>117</sup> I was uneasy about providing the requested information because it seemed to concern POL's relationships with its commercial partners rather than branch accounts. I therefore suggested a way in which the data might be summarised to help inform how the matter could be taken forward. From 4 to 12 August 2014 I was on holiday, and I then appear to have been dropped from the thread and do not believe I participated further in the discussion around this issue.
131. I have also been referred to another email chain from early 2015 on the issue, which I am not copied into.<sup>118</sup> It appears from reading it that the "Rod" referred

---

<sup>117</sup> Email from Belinda Crowe to Charles Colquhoun and others dated 6 August 2014 at 17.16 (POL00021762)

<sup>118</sup> Email from Andy Parsons to Chris Aujard and others dated 27 January 2015 at 13.19 (POL00022297)

Witness: Rodric David Alun Williams  
Statement Number: WITN08420100  
Exhibits: None  
Date: 11 March 2024

to is Rod Ismay, as I do not recall *"spending the day"* with Alisdair Cameron at or around this time.

132. In the course of preparing this statement, I have revisited the Post Office Complaint Review and Mediation Scheme report of 2015 (sometimes called the "End of Term Report").<sup>119</sup> This was prepared at the conclusion of the Scheme to capture in one place POL's overall review of the Scheme in a form which could be shared with applicants. Paragraphs 54 and 55 of the End of Term Report indicate that POL was *"able to answer Second Sight's questions [about suspense accounts] when a shared understanding of the nature of the enquiry had been reached"* and *"Second Sight agreed that it needed no further information on the Suspense Account"*.

*Communications and public affairs strategy during the Scheme*

133. POL's Communications and Public Affairs ("**Comms**") team was responsible for engaging with MPs both generally and with respect to the Scheme. I would provide support to that team as and when it was required, usually by providing specific information or ensuring consistency with previous communications.
134. The Inquiry has asked me to comment on an email from Mark Davies sent on 23 January 2015.<sup>120</sup> This email appears to reflect his personal views on the Second Sight Investigation and Horizon issues generally, and is responded to

---

<sup>119</sup> Post Office Complaint Review and Mediation Scheme ("**End of Term Report**") (POL00040935); and Email of Rodric Williams to Tom Wechsler and others dated 6 March 2015 at 15.32 (POL00040927)

<sup>120</sup> Email from Melanie Corfield to Mark Davies and others dated 23 January 2015 at 21.56 (POL00102062)

Witness: Rodric David Alun Williams  
Statement Number: WITN08420100  
Exhibits: None  
Date: 11 March 2024

by a member of his Comms team. I am unable to comment on how widely these views were shared within POL.

*Advice from Tom Weisselberg KC*

135. The Inquiry has drawn my attention to an email from Patrick Bourke summarising a conference with Tom Weisselberg KC in November 2014.<sup>121</sup> The POL Scheme team had instructed Tom Weisselberg KC to advise on the amenability to judicial review of any decision POL took with respect to the Scheme, and in particular the prospects of a successful judicial review if it decided to close the Scheme. I do not believe I was party to the decision to take advice from Tom Weisselberg KC, so do not know what specifically triggered this. A conference with Tom Weisselberg KC was scheduled for 24 November 2014. I was sent the instructions prepared, I believe by Patrick Bourke, on 20 November 2014. I recall attending the conference and agree that it is fairly summarised by Patrick.

*The termination of Second Sight*

136. I have been asked to comment on an email from Patrick Bourke sent on 5 February 2015, seeking advice from WBD on the implementation, and consequences, of any decision by POL to terminate Second Sight's engagement<sup>122</sup>, and some related documents<sup>123</sup>. I can see that Patrick Bourke

---

<sup>121</sup> Email from Patrick Bourke to Chris Aujard and others dated 24 November 2014 at 18.49 (POL00116814)

<sup>122</sup> Email from Patrick Bourke to Andy Parsons dated 5 February 2015 at 14.01 (POL00022352)

<sup>123</sup> WBD document 'Termination of Second Sight' dated 6 February 2015 (POL00006364); End of Term Report (POL00040935); Email from Andy Parsons to Rodric Williams dated 5 March 2015 at 18.03 (POL00040925); Letter from Jane MacLeod on behalf of POL to Second Sight 'Notice to cease providing services' dated 10 March 2015 (POL00000216); Letter from Jane MacLeod on behalf of POL to Sir Anthony Hooper 'Initial Complaint Review and Mediation Scheme' dated 10 March 2015



Witness: Rodric David Alun Williams  
Statement Number: WITN08420100  
Exhibits: None  
Date: 11 March 2024

stated that a discussion would be taking place at a "senior level" on 6 February 2015, but I do not recall being involved in those discussions or the preparations for them. The outcome of that work was, in essence, to close the Working Group, have Second Sight complete its (revised) Part Two report and its case review reports for all the remaining applicants to the Scheme (POL having completed all of its investigation reports by this time). POL would then offer mediation in all cases except those the subject of a final court determination.

137. This position was reflected in the suite of correspondence emailed to me by Andy Parsons on 5 March 2015,<sup>124</sup> which I (among others) reviewed and commented on. Although this outcome involved the termination on notice of Second Sight's existing engagement with POL, they were at the same time being instructed to continue to have a role in the Scheme, involving completing their case review reports directly for each Scheme applicant.<sup>125</sup> A new engagement letter was signed between POL and Second Sight on 15 April 2015. I believe therefore that this reflects a change to the structure within which Second Sight would complete the same work, rather than the cancellation of that work.

### *Second Sight and Disclosure*

138. The Inquiry has asked me to comment on a 2006 'Post Office Ltd Confidential: Investigation, Legal' report, included in an exchange of communications with

---

(POL00022456); and Letter from Jane MacLeod on behalf of POL to Second Sight 'Initial Complaint Review and Mediation Scheme: Work Plan' dated 10 March 2015 (POL00000219)

<sup>124</sup> Email from Andy Parsons to Rodric Williams dated 5 March 2015 at 18.03 (POL00040925)

<sup>125</sup> Letter from Jane MacLeod on behalf of POL to Second Sight 'Initial Complaint Review and Mediation Scheme: Work Plan' dated 10 March 2015 (POL00000219)

Witness: Rodric David Alun Williams  
Statement Number: WITN08420100  
Exhibits: None  
Date: 11 March 2024

Second Sight about it in June 2015.<sup>126</sup> I do not recall who precisely asked me to look into this issue, but it will have come from the POL Scheme team. The exchange begins with a letter from me to Second Sight, in which I asked Second Sight a number of questions about its handling of the report, over which POL was asserting legal professional privilege. Second Sight had referred to the letter in a Case Review Report prepared in the context of the Scheme. The basis on which POL was asserting privilege was that the 2006 document appears to have been prepared for the Corporate Security Criminal Law Team, with the penultimate paragraph of the report expressly reading *“These papers are now forwarded to you for sight and advice on the sufficiency of evidence as to whether criminal charges are brought against Mrs Hamilton”*.

139. As noted at paragraph [25] above, I have no experience or expertise in criminal matters, so am not able to determine whether there was anything in the report capable of casting doubt on the safety of Jo Hamilton’s conviction. However, as noted at paragraph [88] and [97]] above Cartwright King were reviewing cases in the Scheme for that purpose and had reviewed this specific case.

## **PART 6: KNOWLEDGE OF REMOTE ACCESS PRIOR TO THE GROUP LITIGATION**

140. I have been asked a number of questions that relate to POL’s knowledge of what has generally been described as “remote access”, that is, the ability of those at Fujitsu or POL to alter transactions recorded by a PMR through Horizon

---

<sup>126</sup> POL Investigation, Legal report regarding Josephine Hamilton dated 17 May 2006 (POL00044389); Letter from Rodric Williams on behalf of POL to Second Sight ‘MO35 – Josephine Hamilton’ dated 2 June 2015 (POL00025188); and Email from Second Sight to Rodric Williams dated 3 June 2015 at 14.15 (POL00065542)

Witness: Rodric David Alun Williams  
Statement Number: WITN08420100  
Exhibits: None  
Date: 11 March 2024

without that PMR being aware. I am not an IT specialist and this was a highly technical matter, however, to assist the Inquiry I set out at this juncture what I recollect my knowledge to be of the issue at different stages prior to the commencement of the Group Litigation.

#### *2013 Allegations of Remote Access*

141. As I mention at paragraph [53] I first became aware of remote access allegations in mid-2013 in the context of the Spot Reviews where a PMR had alleged that Fujitsu could remotely alter transaction records. As I explain at paragraph [54], I instructed WBD to obtain a witness statement for Second Sight in response to this.

#### *Remote Access in Spring 2014*

142. In April 2014 in the context of the Scheme, the issue of remote access came to my attention again. I again discussed this with WBD, who advised what information should be sought from Fujitsu. I wrote to James Davidson of Fujitsu on 17 April 2014 and asked whether POL or Fujitsu could change branch transaction data without a PMR being aware of the change. He confirmed that POL could not change branch transaction data without a PMR being aware of the change. He stated in his summary that there was "*no ability to delete or change records a branch creates in either old Horizon or Horizon on line. Transactions in both systems are created in a secure and auditable way to assure integrity*".<sup>127</sup> Fujitsu explained that it was possible for additional transactions to be inserted by Fujitsu (and not POL) in the event of error and

---

<sup>127</sup> Email from James Davidson to Rodric Williams dated 17 April 2014 at 16.27 (FUJ00087119)

Witness: Rodric David Alun Williams  
Statement Number: WITN08420100  
Exhibits: None  
Date: 11 March 2024

summarised the security process for doing so (known as 'balancing transactions'). They had only identified this occurring once since the migration to Horizon Online, in March 2010, and stated that this was covered by "an auditable log".

143. I believe, but cannot be certain, that the information that Fujitsu provided in April 2014 was shared with Second Sight. I explain this and some of the follow up work at paragraph [101]. Around the same time, POL had instructed Deloitte to undertake its desktop review of the Horizon system. The explanation that Fujitsu had given in April 2014 about the possibility of balancing transactions was also shared with Deloitte.<sup>128</sup>

144. In May 2014 documents were being prepared by Deloitte for POL's Board. The May 2014 Deloitte Report states in a table at Appendix 2 that there were database access privileges that "*would enable a person to delete a digitally signed basket*" and that such privileges were restricted to authorised administrators at Fujitsu. It also mentioned that there were database access privileges that would theoretically "*enable a person to create or amend a basket and re-sign it with a 'fake' key*", again such privileges were restricted to authorised administrators at Fujitsu.<sup>129</sup> The version of the Board Briefing shared with me by the Inquiry states that it was possible for "*Fujitsu staff with suitably authorised privileged access to delete data from the Audit Store*". I do not believe that anyone within POL (and certainly I did not) properly focused on or

---

<sup>128</sup> As can be seen from Sean Hodgkinson's follow-up questions in **FUJ00087119**.

<sup>129</sup> The May 2014 Deloitte Report (**POL00028062**)

Witness: Rodric David Alun Williams  
Statement Number: WITN08420100  
Exhibits: None  
Date: 11 March 2024

understood this until they were highlighted in the context of a later internal review carried out by Sir Jonathan Swift (see below at [150]-[151]).

145. The Inquiry has asked me to comment on an email exchange I had with Mark Westbrook at Deloitte on 20 May 2014 in relation to a version of Deloitte's draft update to the board.<sup>130</sup> The reason for the exchange was that I had gathered that Deloitte had identified that a specific control on the audit store was not as secure as understood by POL, and I wanted to know a bit more about it in case it raised a "red flag" which required escalation. Mark's reply was that it a theoretical possibility for which there were other controls, that Deloitte was looking into it further and continuing to ask questions of Fujitsu and that Deloitte would address it in their final report. As with other Horizon related technical information, the detail of this audit store issue was outside my area of expertise, and in light of Mark's response I do not recall giving this further consideration.

*Balancing transactions and Second Sight in Autumn 2014*

146. I am referred by the Inquiry to correspondence from Fujitsu forwarded to me and others on 23 October 2014 by Belinda Crowe.<sup>131</sup> The context for this was that the issue of access to Horizon data had arisen again in relation to two cases in the Scheme on which Second Sight had completed a report, and Belinda Crowe sought to form a common understanding of what was and was not possible with "remotely accessing" Horizon in order to appropriately respond to these allegations.<sup>132</sup> It was intended that a meeting be held with

---

<sup>130</sup> Email from Mark Westbrook to Rodric Williams on 20 May 2014 at 12.44 (POL00029728)

<sup>131</sup> Email from Belinda Crowe to Patrick Bourke and others dated 23 October 2014 at 07.29 (POL00091397)

<sup>132</sup> Email from Belinda Crowe to Angela van den Bogerd and others dated 21 October 2014 at 16.34 (POL00307607)



Witness: Rodric David Alun Williams  
Statement Number: WITN08420100  
Exhibits: None  
Date: 11 March 2024

Fujitsu, but this was cancelled and James Davidson instead sent through a note explaining how integrity in Horizon was "assured" through the Core Audit Process. In this note he stated that "*Transactions as keyed in at the branch, once "committed" cannot be altered... any changes required centrally to committed Transactions can only be done via the creation of additional transactions*".<sup>133</sup> I believe in this email James Davidson was trying to emphasise the importance of Horizon's audit store as the best record of branch transactions, rather than documents derived from it which (as I believe the Helen Rose Report discussed) could present a misleading picture. It was in the context of this email from Fujitsu that I forwarded to Belinda Crowe the Spot Review Bible on 31 October 2014 and drew attention to Spot Review 5 regarding Mr Rudkin, referred to above at [53], so that his allegation of remote access could be seen at the same time.<sup>134</sup>

147. The information that Fujitsu had provided to Deloitte about balancing transactions was provided to Andy Parsons in November 2014,<sup>135</sup> and I understand he had a call with Fujitsu to discuss the remote access point. He summarised the current understanding of remote access and balancing transactions into a note that was then shared with Fujitsu to approve the content.<sup>136</sup> The note would then be used as part of POL's response to Second

---

<sup>133</sup> Email from Belinda Crowe to Patrick Bourke and others dated 23 October 2014 at 07.29 (POL00091397)

<sup>134</sup> Email from Rodric Williams to Belinda Crowe dated 31 October 2014 at 13.45 (POL00062162)

<sup>135</sup> Email from Mark Westbrook to Rodric Williams and others dated 10 November 2014 at 14.02 (POL00149466)

<sup>136</sup> Email from Andy Parsons to Belinda Crowe and others dated 10 November 2014 at 16.44 (POL00212048) and Email from Andy Parsons to Rodric Williams on 17 December 2014 at 15.35 (POL00308936)

Witness: Rodric David Alun Williams  
Statement Number: WITN08420100  
Exhibits: None  
Date: 11 March 2024

Sight when enquiries about remote access were made.<sup>137</sup> I was not directly involved in this process, but was copied into emails.<sup>138</sup>

*Cartwright King and Brian Altman KC advice on balancing transactions*

148. As noted above, POL also provided the Deloitte Project Zebra report to Cartwright King, initially as part of the work they were doing to locate another expert on Horizon in February 2015.<sup>139</sup> Cartwright King asked further questions in response to this, which needed to be looked at closely, and which Andy Parsons and I ran down with Fujitsu.<sup>140</sup> This culminated in a report being provided by Fujitsu on balancing transactions in July 2015. Further advice was also sought from Cartwright King and Brian Altman KC on how to address balancing transactions in light of the further information provided by Fujitsu. This is reflected in the advice chronology at POL00021799. I have located an email of 27 August 2015 that Andy Parsons wrote to Brian Altman KC reflecting his understanding of Brian's advice in respect of disclosure of information about balancing transactions to PMRs who had been prosecuted, which was confirmed with Brian Altman KC.

---

<sup>137</sup> Email from Andy Parsons to Rodric Williams on 17 December 2014 at 15.35 (POL00308936)

<sup>138</sup> Email from Patrick Bourke to Andy Parsons and others dated 26 November 2014 at 13.29 (POL00149675)

<sup>139</sup> Email from Mark Westbrook to Rodric Williams and others dated 26 February 2015 at 12.24 (POL00222757)

<sup>140</sup> WBD document 'Advice on Balancing Transactions' (POL00021799)

Witness: Rodric David Alun Williams  
Statement Number: WITN08420100  
Exhibits: None  
Date: 11 March 2024

### *Second Sight Part 2 Report*

149. In April 2015 Second Sight published their revised Part Two report, which included a new section 14 on the balancing transactions process.<sup>141</sup> That was then sent to POL's external criminal lawyers, and POL worked up its reply document which it shared with Second Sight on 16 April 2015.

### *Swift Review and Remote Access*

150. As mentioned above, the issue of remote access came up again in the context of the review carried out by Sir Jonathan Swift.<sup>142</sup> I believe it was apparent by January 2016 that a focus area of that review would be balancing transactions, which is why I believe I forwarded to Mark Underwood<sup>143</sup> (Head of Portfolio: Legal, Risk & Governance) some of the advice POL had previously received on the issue.<sup>144</sup> It also appears that, by mid-January 2016, Sir Jonathan Swift had provided to POL an advanced draft of the his report (the "**Swift Review**"), and that Mark Underwood had summarised its recommendations into a "grid". As can be seen in the "Proposal" column of that grid, POL agreed to send to Sir Jonathan Swift the advice received with respect to balancing transactions (which I presume is why I asked WBD to collate this for me into one place in the POL00021798 and POL00021799 documents).

---

<sup>141</sup> Email from Patrick Bourke to Ian Henderson and others dated 9 April 2015 at 10.27 (**POL00029836**); and Extract from Second Sight '14. Transactions not entered by the Subpostmaster or their staff (**POL00021846**)

<sup>142</sup> Sir Jonathan Swift was Jonathan Swift QC at the time of his appointment to lead the review. From here on in he is referred to in this statement as Sir Jonathan Swift.

<sup>143</sup> Mark Underwood was a non-lawyer who had been on POL's Scheme team and was continuing to work on Horizon issues.

<sup>144</sup> Email from Rodric Williams to Mark Underwood dated 13 January 2016 at 10.57 (**POL00065929**)

Witness: Rodric David Alun Williams  
Statement Number: WITN08420100  
Exhibits: None  
Date: 11 March 2024

151. Sir Jonathan Swift had spoken with Second Sight, Fujitsu and Deloitte in the course of this process and reviewed information from Fujitsu. The final version of the Swift Review pointed out to POL that a Deloitte report from 2014 had flagged the theoretical possibility of Fujitsu 'superusers' making remote amendments to branch accounts, which had not been focused on before, meaning that what Fujitsu and POL had previously said about remote access was wrong. Sir Jonathan Swift therefore recommended further advice be taken on balancing transactions and Fujitsu's ability to amend and delete data in the audit store, which POL proceeded to take (see further paragraph [183] below).

## **PART 7: POL WORK IN RESPECT OF CRIMINAL PROSECUTIONS 2014-2016**

### **Supply of Documents from Fujitsu**

152. The Inquiry has asked me to comment on two documents, a draft memorandum and a note on securing data for future prosecutions, both from around July 2014.<sup>145</sup> Beyond being aware of the general need for POL to preserve data in support of its prosecution activities (e.g. as part of any IT transformation project), I do not recall having a specific role in relation to these documents, which were being managed by POL's criminal lawyers. I was aware that POL's contract with Fujitsu contained provisions concerning the court case support that Fujitsu should provide to POL, because I considered these provisions with POL's external solicitors CMS Cameron McKenna in around 2013 when the contract was updated. I did not at this time, between 2014 and 2016, know whether or not those provisions could apply to the Known Error Log ("KEL"),

---

<sup>145</sup> Simon Clarke 'Proposed Memorandum of Understanding POL and Fujitsu' dated 4 February 2014 (POL00113136) and Simon Clarke 'Securing Data for Future Prosecutions' dated 2 July 2014 (POL00113135)

Witness: Rodric David Alun Williams  
Statement Number: WITN08420100  
Exhibits: None  
Date: 11 March 2024

PinICLs and PEAKs (an individual incident recorded on the KEL) which Fujitsu maintained in relation to Horizon, and did not need to turn my mind to this because Fujitsu were generally responsive to POL's requests for information without POL needing to raise contractual rights.

153. My understanding of how POL's contractual rights with Fujitsu could relate to KEL however grew in the course of the Group Litigation, with POL's position being summarised in the 'Post Office Submissions in relation to the Fujitsu Contract' specifically addressing this issue,<sup>146</sup> which were filed on or about 31 July 2019.

#### January and February 2015 Engagement with the CCRC

154. On 14 January 2015, the CCRC sent a letter to POL along with a notice under s.17 of the Criminal Appeal Act 1995 (a "**s.17 Notice**"), seeking disclosure of Brian Altman KC's advice (which had been referred to in correspondence POL exchanged with the CCRC in July 2014) and "*the preservation of any materials associated with the affected cases*". I believe this was the first time the CCRC had formally exercised its statutory powers, so a short letter was sent to the CCRC by Chris Aujard on 20 January 2015, acknowledging receipt of the CCRC's letter.<sup>147</sup> POL then sought advice from its external lawyers on the CCRC's statutory powers and how best to respond to the CCRC's letter. POL understood the importance of the CCRC and wanted to cooperate with it, but needed to understand the legal foundation and context given the very broad requests for information the CCRC had made.

---

<sup>146</sup> Post Office submissions in relation to the Fujitsu contract dated 31 July 2019 (POL00042858)

<sup>147</sup> Email from Rodric Williams to Martin Smith dated 21 January 2015 at 16.46 (POL00150845)



Witness: Rodric David Alun Williams  
Statement Number: WITN08420100  
Exhibits: None  
Date: 11 March 2024

155. After considering the advice received, POL sent a more substantive response to the CCRC on 11 February 2015. This was drafted with the assistance of external lawyers and sought clarification of the CCRC's functions, while expressing POL's commitment to working with the CCRC.<sup>148</sup> The CCRC provided the requested clarification on 12 February 2015, after which a further letter was sent to the CCRC by the new POL General Counsel, Jane MacLeod, on 27 February 2015.<sup>149</sup> This enclosed Brian Altman KC's report and confirmed that all materials reviewed as part of the Sift Reviews and the Scheme would be preserved. It also asked for clarification of which of Brian Altman KC's findings or recommendations were being sought. I was involved in completing a first draft of this letter with Gavin Matthews of WBD, which was then reviewed by Brian Altman KC and Jane MacLeod before being sent.<sup>150</sup>

#### Simon Clarke's Response to the Deloitte Report

156. I have been asked to consider the 27 March 2015 note of advice from Simon Clarke in response to the Deloitte report of 23 May 2014.<sup>151</sup> In February 2015, POL was again engaging with the CCRC, following their letter of 14 January 2015 referred to above at paragraph [154]. Although I cannot recall for sure, I suspect that this contact from the CCRC is what prompted POL to seek advice from Simon Clarke about whether disclosure of the Deloitte report needed to be made in respect of past prosecutions. The Inquiry has asked me specifically

---

<sup>148</sup> Email from Rodric Williams to Martin Smith and others dated 9 February 2015 at 14.20 (POL00311931)

<sup>149</sup> Email from Rodric Williams to Georgia Baker dated 27 February 2015 at 11.42 (POL00312540) and Letter from Jane MacLeod to CCRC dated 27 February 2015 (POL00223161)

<sup>150</sup> Email from Gavin Matthews to Rodric Williams dated 26 February 2015 at 15.20 (POL00151297); and Email from Georgia Barker to Rodric Williams dated 3 March 2015 at 10.02 (POL00223160)

<sup>151</sup> Simon Clarke 'Note: Deloitte Report - Questions for POL' dated 27 March 2015 (POL00029843)

Witness: Rodric David Alun Williams  
Statement Number: WITN08420100  
Exhibits: None  
Date: 11 March 2024

about paragraph 6 of Simon Clarke's note of advice, which records a summary of a telephone conference I attended with him and Andy Parsons. While I do not recall this conversation specifically, I have no reason to believe that it has not been fairly recorded. My involvement in these matters related to providing instructions and information to Cartwright King, and this paragraph is consistent with me acting in that role.

157. POL had done work on remote access and balancing transactions in the context of Second Sight's work, and obtained the information summarised at paragraph 6 of Simon Clarke's note in that context. At this point in time, the focus was on whether the May 2014 Deloitte Report needed to be disclosed in past criminal cases (i.e. as had been done with the Interim Report and Helen Rose Report in the Sift Review).

#### Meeting with the CCRC in May 2015

158. POL started receiving s.17 Notices in relation to specific cases in March 2015. These were forwarded to Cartwright King, with instructions to start collating and preserving responsive documents given that they would know from their experience of working with POL on prosecutions the type of information that would need to be provide to the CCRC and where that would be located. WBD were also instructed to help POL manage the responses overall, as it was quickly apparent that responding to the s.17 Notices would be a significant exercise.
159. In its 12 and 27 February 2015 letters, POL had offered to discuss the best way to progress matters with the CCRC. On receipt of the first tranche of s.17

Witness: Rodric David Alun Williams  
Statement Number: WITN08420100  
Exhibits: None  
Date: 11 March 2024

Notices, Jane MacLeod suggested that this be expedited, which led to a meeting being arranged with the CCRC on 8 May 2015.<sup>152</sup> I exchanged emails with the CCRC to determine the matters that could usefully be discussed, with the focus being on how POL could best facilitate the CCRC's reviews.<sup>153</sup> I also prepared a 'speaking note', which collated information that might be relevant in the meeting, and which I hoped would serve as a general primer to help bring Jane MacLeod up to speed on the background, bearing in mind that she had only recently started as POL's new General Counsel.<sup>154</sup>

160. I recall that the meeting was held at POL's head office and was constructive and cordial (as was the case with all my interactions with the CCRC). One of the main actions taken away was Jane MacLeod's suggestion that POL set up a file sharing platform to facilitate transfers of data to the CCRC and to help manage the volume of material which would be provided. Following the meeting, POL worked with the CCRC to set up the "Millnet" electronic document review platform, and continued to collate responsive material, including relatively substantial volumes of electronic data. WBD were instructed to assist POL in tracking and disclosing the materials to the CCRC over the Millnet platform as I did not have the capacity to address the requests directly myself.

161. On 10 and 18 September 2015, I wrote to the CCRC updating them on progress, and again inviting them to discuss with POL how best to progress the disclosure process. The CCRC responded on 1 October 2015, inviting POL up

---

<sup>152</sup> Draft speaking note for Post Office meeting with CCRC dated 8 May 2015 (**POL00110243**); and Speaking note for Post Office meeting with CCRC dated 8 May 2015 (**POL00125758**)

<sup>153</sup> Email from Rodric Williams to Gregg Cooke and others dated 15 April 2015 at 17.47 (**POL00314595**)

<sup>154</sup> Jane Macleod joined POL around the time of Second Sight's termination.

Witness: Rodric David Alun Williams  
Statement Number: WITN08420100  
Exhibits: None  
Date: 11 March 2024

to their offices in Birmingham “to take stock”, and a meeting was ultimately held there on 6 November 2015.

Meeting with the CCRC in November 2015

162. The Inquiry has asked me to consider two documents relating to that meeting, on 6 November 2015. These are the ‘speaking note’ for the meeting,<sup>155</sup> which adopted a similar format to the speaking note for the May 2015 meeting, and an updated version of the document containing a note of the meeting.<sup>156</sup> Both documents were prepared by WBD at my request.
163. I recall the meeting focussing on disclosure, including electronic document management and the provision of both specific documents and broader categories of material. The CCRC’s investigation was still at an early stage, it was for example continuing to receive new applications, so my memory is that we only discussed “concerns” about disclosure in the sense of needing to identify the documents which would be most helpful to the CCRC amongst what was likely to be an extremely large body of material. Although the note of the meeting shows that we discussed the material that Fujitsu might hold, I do not recall any discussion about BEDs, KELs, PinICLs or PEAKs.
164. Following the 6 November 2015 meeting with the CCRC, I recall that POL began collating the material discussed at the meeting as well as continuing to respond to further s.17 Notices as these were received. I emailed the CCRC on 4 December 2015 and 5 January 2016 to update them on progress, before

---

<sup>155</sup> Speaking note for Post Office meeting with CCRC dated 6 November 2015 (POL00065670)

<sup>156</sup> Annotated Speaking note for Post Office meeting with CCRC dated 6 November 2015 (POL00065671)

Witness: Rodric David Alun Williams  
Statement Number: WITN08420100  
Exhibits: None  
Date: 11 March 2024

sending a substantive reply on 13 January 2016.<sup>157</sup> Following that reply, the CCRC and I continued to exchange emails in which the CCRC identified, and POL sought to provide, a variety of information relevant to its investigations both in terms of documents and also through responding to written questions.

### 2016 Engagement with the CCRC

165. I continued to liaise with the CCRC throughout 2016, with the support of Cartwright King and WBD.<sup>158</sup> WBD would source and collate responses to CCRC requests into draft emails, which they were well placed to do given their involvement in POL's responses to the PMRs' Horizon complaints. I would then review the draft emails before sending final responses to the CCRC. In doing this, I was relying on WBD for the accuracy of the material being provided and had confidence in that given their work with POL generally. I always tried to conclude emails to the CCRC with an offer to provide anything further they may require, to underscore POL's ongoing commitment to providing to the CCRC any information that would assist their process. Once sent, I forwarded to WBD the final emails sent to the CCRC for their records.

166. The inquiry has asked me to comment on an email I sent to WBD on 25 April 2016.<sup>159</sup> I do not recall the conversation referred to in that email, but it is likely to have concerned the requests POL was receiving from the CCRC.<sup>160</sup> In my

<sup>157</sup> Email from Rodric Williams to Amanda Pearce dated 13 January 2016 at 15.12 (POL00242986)

<sup>158</sup> See Email from Rodric Williams to Amanda Pearce dated 14 March 2016 at 16.45 (POL00103156); Email from Gavin Matthews to Rodric Williams dated 2 August 2016 at 13.48 (POL00103238); Email from Rodric Williams to Amanda Pearce dated 13 November 2016 at 23.16 (POL00103263); and Email from Rodric Williams to Amanda Pearce dated 21 December 2016 at 18.44 (POL00103278)

<sup>159</sup> Email from Rodric Williams to Gavin Matthews and others dated 25 April 2016 at 11.40 (POL00137142)

<sup>160</sup> For context, at this same time POL was also starting to respond to the claim form issued in the Group Litigation as well as taking forward the recommendations of the Swift Review.



Witness: Rodric David Alun Williams  
Statement Number: WITN08420100  
Exhibits: None  
Date: 11 March 2024

email, I asked WBD whether advice received from Cartwright King in December 2015 in relation to disclosure in past prosecutions should be revisited with Brian Altman KC, with a view to POL taking a more pro-active approach to disclosure. I believe I raised this because I wanted to be sure POL was complying with its disclosure duties.

## **PART 8: POL COMMUNICATIONS WITH EXTERNAL ACTORS 2014-2016**

### **Engagement with Baroness Neville-Rolfe of Autumn 2015**

167. As stated above, POL's Comms team was responsible for engaging with parliamentarians. The Inquiry has referred me to email correspondence relating to a meeting between Baroness Neville-Rolfe (the Parliamentary Under-Secretary of State for Intellectual Property) and Lord Arbutnot, including an email summary of that meeting circulated by Patrick Bourke on 17 September 2015.<sup>161</sup> I do not believe I attended the meeting, so my email on 18 September 2015 only responded to the content of Patrick Bourke's summary. In particular, I provided my observations on the suggestion that POL should interview POL or Royal Mail personnel who had been involved in Jo Hamilton's prosecution many years earlier. My email refers to a "red folder". This was a ring binder (which happened to be red) containing hard copies of some contemporaneous documents from Jo Hamilton's prosecution files, which I had collated around the time of the *Panorama* broadcast (discussed further below at [171]-[174]). On their face these documents showed liaison between POL/Royal Mail investigators and legal advisers, over a period of time, about the evidence in

---

<sup>161</sup> Email from Mark Underwood to Patrick Bourke dated 18 September 2015 at 13.24 (POL00065602)

Witness: Rodric David Alun Williams  
Statement Number: WITN08420100  
Exhibits: None  
Date: 11 March 2024

the Jo Hamilton case, and the charges that could be brought based on that evidence.

168. The Inquiry has asked me specifically about my comment at point 18 of my email of 18 September 2015 that: *"perhaps most importantly, any interview will be covered by the CCRC's s.17 Notice for Jo Hamilton and therefore would have to be disclosed to the CCRC"*. My view, as expressed in (a) to (c) of point 18, was essentially that I did not see the benefit of conducting interviews in 2015 given the amount of time since the events in question and the uncertainty around what was being asked, such that any interview would be inherently unreliable and the type of 'new material' which POL had been advised against creating in the context of the Scheme (see paragraph [120] above), but would be disclosable to the CCRC regardless of how accurate it was. Nevertheless, had this proposal been pursued further, I am most likely to have suggested that further formal advice be taken from POL's criminal law advisers as to its risks.

#### Engagement with the Media

169. Generally, POL's Comms team was responsible for POL's engagement with the media. I was typically the contact for Comms within POL's in-house legal team if they felt they needed legal support, which could range from ad hoc reviews of statements they were proposing to make, to legal advice in respect of proposed broadcasts. I would arrange external legal support where that was required, usually from CMS Cameron McKenna ("**CMS**") whom I had been introduced to shortly after joining POL. As I have set out above at [17], my role as an in-house lawyer was one of legal risk manager, and this was my focus in POL's engagement with the media.

Witness: Rodric David Alun Williams  
Statement Number: WITN08420100  
Exhibits: None  
Date: 11 March 2024

170. I have been asked to consider selected correspondence with the BBC, Nick Wallis and internally within POL from December 2014 to January 2015.<sup>162</sup> My recollection of this time was that Comms team was concerned that the BBC was proposing to broadcast a piece on the One Show about PMR Horizon complaints, which would be damaging to POL. I was therefore asked to support the Comms team in its exchanges with the BBC, for which I obtained external support from CMS. I believe the legal input into POL's exchanges with the BBC is reflected in the documents shown to me by the Inquiry. I am not aware of POL threatening to issue proceedings against the BBC, and I was not asked to consider issuing proceedings as a consequence of the correspondence or the broadcast.
171. The Inquiry has raised a number of questions about POL's approach to the planned broadcast of an episode of *Panorama*, "Trouble at the Post Office", about POL and Horizon on 17 August 2015.<sup>163</sup> My recollection of this time is

---

<sup>162</sup> Email from Belinda Crowe to Mark Davies and others dated 5 December 2014 at 18.42 (POL00101659); Letter from Rodric Williams to Nick Wallis dated 5 December 2014 (POL00101660); Email from Mark Davies to Belinda Crowe and others dated 7 December 2014 at 22.52 (POL00101665); Email from Patrick Bourke to Mark Davies and others dated 8 December 2014 (POL00101668); Email from Tom Wechsler to Melanie Corfield and others dated 8 December 2014 at 09.51 (POL00101670); Email from Rodric Williams to Belinda Crowe and others dated 8 December 2014 at 10.16 (POL00101671); Letter from CMS to BBC Programme Legal Advice dated 9 December 2014 (POL00101715); Email from Rodric Williams dated 9 December 2014 at 10.45 (POL00101741); Email from Rodric Williams to Mark Davies dated 9 December 2014 at 12.28 (POL00101745); Email from Angela van den Bogerd to Rodric Williams and others dated 14 December 2014 at 12.34 (POL00101858); Letter from CMS to BBC Programme Legal Advice dated 16 December 2014 (POL00101915); Email from Rodric Williams to Mark Davies and others dated 16 December 2014 at 14.16 (POL00101899); Email from Melanie Corfield to Tom Wechsler dated 16 December 2014 at 14.27 (POL00101902); Email from Melanie Corfield to Mark Davies and others dated 16 December 2014 at 14.39 (POL00101906); Draft letter from CMS to BBC Programme Legal Advice dated January 2015 (POL00101980); Email from Belinda Crowe to Rodric Williams and others dated 8 January 2015 at 18.10 (POL00101968); and Email from Susan Barty to Ruth Barker and others dated 19 January 2015 at 10.41 (POL00105883)

<sup>163</sup> Email from Rodric Williams to Melanie Corfield and others dated 16 June 2015 at 09.51 (POL00117416); Email from Mark Davies to Rodric Williams dated 22 June 2015 at 17.41 (POL00065410); Email from Mark Davies to Rodric Williams dated 23 June 2015 at 10.51 (POL00065416); Email from Tom Reid to Rodric Williams and others dated 23 June 2015 at 11.22 (POL00065419); Email from Patrick Bourke to Rodric Williams dated 26 June 2015 at 10.22 (POL00065429); Email from Tom Reid to Rodric Williams dated 5 August 2015 at 15.04

Witness: Rodric David Alun Williams  
Statement Number: WITN08420100  
Exhibits: None  
Date: 11 March 2024

that POL wanted to know what *Panorama* was planning to say in the broadcast, so it could provide an informed response for the BBC to consider before it aired. This was initially explored through exchanges between Comms (with legal support) and the *Panorama* editorial team. As the broadcast came nearer, and POL felt that its position would not be fairly portrayed, a formal letter from CMS was then drafted and sent on 10 August 2015 so POL's position was understood and reflected as the broadcast was being edited.

172. The statement "*It is not possible for Post Office or Fujitsu to remotely edit transactions as they were recorded by branches*" essentially repeated POL's statement made to the BBC on 4 August 2015 and focused on balancing transactions.<sup>164</sup> It is however incorrect, as it was theoretically possible for administrators at Fujitsu with the appropriate level of privilege to alter transactions. The statement should therefore have reflected that possibility of "superuser access", which Deloitte had identified in their 2014 reports.<sup>165</sup> It is regrettable that it did not, but this was not deliberate; I did not intend to mislead the BBC. As noted above at [144], this was not something I believe that anyone within POL registered at the time.

---

(POL00065499); Letter from CMS to BBC Programme Legal Advice dated 10 August 2015 (POL00065519); Email from Susan Barty to Mark Davies and others dated 15 September 2015 at 15.04 (POL00105862); Email from Tom Reid to Rodric Williams dated 11 January 2016 at 18.16 (POL00105866); and Email from Rodric Williams to Mark Davies and others dated 3 March 2016 at 13.23 (POL00106920)

<sup>164</sup> This stated "*Neither Post Office nor Fujitsu can edit the transactions as recorded by branches. Post Office can correct errors in and/or update a branch's accounts by inputting a new transaction (not editing or removing any previous transactions). However, this is shown transparently in the branch transaction records. There is no evidence that any branch transaction data was inappropriately accessed from a remote access point.*" (Email from Rodric Williams to Tom Reid dated 10 August 2015 at 16.13 (POL00152834), attaching POL 'Statement for Panorama' dated 4 August 2015 (POL00152835))

<sup>165</sup> As noted in the May 2014 Deloitte Report (POL00028062) (discussed above at paragraph [145]).



Witness: Rodric David Alun Williams  
Statement Number: WITN08420100  
Exhibits: None  
Date: 11 March 2024

173. Insofar as Richard Roll's contribution to the Panorama broadcast was concerned, I did not know, and do not believe anyone within POL knew, who he was before the broadcast of the *Panorama* episode. After seeing his contribution, I did note that he had not worked for Fujitsu or in the IT industry for a lengthy period of time, and so would not be commenting on the Horizon system as it was currently operating. I am aware that some enquiries were made by POL to Fujitsu about Richard Roll's employment with them shortly after the broadcast.<sup>166</sup> Richard Roll's allegations were subsequently looked into as part of the Swift Review.<sup>167</sup> Following the broadcast, POL reviewed its engagement with the editorial team and at the direction of the Comms team pursued a formal complaint against the BBC about the broadcast. This complaint was not upheld.
174. The Inquiry has asked me to comment on an email chain involving discussions about the Panorama programme with the Shareholder Executive (which managed the government's investment in POL at that time).<sup>168</sup> Mark Underwood has asked me in that email whether I was happy with the lines he had drafted, but those lines do not appear to be reflected in the email chain at POL00102517 and I cannot now recall what they were. My discussion with Mark

---

<sup>166</sup> Email from Michael Harvey to Rodric Williams dated 21 December 2015 at 14.14 (POL00131623)

<sup>167</sup> The allegations made by Richard Roll were described in the Swift Review as the "only genuinely new information" seen in the broadcast (paragraph 87 at POL00006355) and of potential significance. In respect of the allegation that "financial records were sometimes changed remotely without the postmaster knowing" the Swift Review states that "[t]he specific comments in the Panorama programme are, however, ambiguous and unclear as to precisely what is being suggested was done. It is difficult to deal with or respond to those comments as a result" (paragraph 136 at POL00006355) confirms that POL did not see the detail of Mr Roll's suggestions (paragraph 148 at POL00006355)

<sup>168</sup> Email from Mark Underwood to Rodric Williams and others dated 25 August 2015 at 13.23 (POL00102517)



Witness: Rodric David Alun Williams  
Statement Number: WITN08420100  
Exhibits: None  
Date: 11 March 2024

appears to have taken place outside of the email chain and I cannot recall the contents of it.

175. My understanding of POL's general attitude and strategy at that time towards the media, and its aims in dealing with them, was that the media could and would report on POL. It was therefore important to maintain an open dialogue with journalists so as to get an insight into what they might say and try to ensure they reflected POL's position, with matters only being escalated to formal legal intervention if it was felt essential to ensure a balanced presentation of POL's position in the finished publication.

## **PART 9: THE SWIFT REVIEW AND FOLLOW UP ACTIONS**

### **The Swift Review**

176. In October 2015 Tim Parker became the Chairman of POL (the "**Chairman**"). I was not a party to the discussions which led to this, but on taking office the Chairman was asked by the Parliamentary Under-Secretary of State, Baroness Neville-Rolfe, to determine whether any further action was necessary to address PMR's Horizon complaints, as formally made in a letter dated 10 September 2015.<sup>169</sup> In order to do this, the Chairman asked POL's General Counsel to identify a suitable barrister who could provide independent advice to him, and following that to provide the barrister with any information they required. This independent advice would inform the Chairman's response to Baroness Neville-Rolfe, and I (with others) helped the General Counsel to facilitate this.

---

<sup>169</sup> Letter from Baroness Neville-Rolfe to Tim Parker dated 10 September 2015 (POL00102551)

Witness: Rodric David Alun Williams  
Statement Number: WITN08420100  
Exhibits: None  
Date: 11 March 2024

177. I helped to identify a number of (then) Queen's Counsel as potential candidates to provide the independent advice sought, based on my own experience and recommendations from WBD. A draft email was prepared by Patrick Bourke and Mark Underwood to send to the Chairman proposing two possible candidates on 1 October 2015. That email also suggested some text to describe very generally the potential scope of the review, while noting that the appointed QC would ultimately advise on this. I do not know how or why the Chairman chose Sir Jonathan Swift. He was appointed with a junior barrister to assist him, Christopher Knight. As a result, the independent review carried out on behalf of Chairman became known as the "Chairman's review". I refer to final report as the "Swift Review".
178. Following their appointment, I drafted instructions to Sir Jonathan Swift and Christopher Knight, which repeated the general text on scope sent to the Chairman on or about 1 October 2015. These instructions recorded that the Chairman required Sir Jonathan Swift's advice on the actual scope of the review and how it was to be framed, the process by which the review should be conducted, and the nature of the final report.<sup>170</sup> It was hoped that the final report would be completed by Christmas 2015. In the draft instructions, I also set out some background information and identified some potentially relevant documents to help Sir Jonathan Swift read into the matter ahead of an initial conference with him on 8 October 2015. Following this conference Sir Jonathan Swift proposed 'Terms of Reference' for discussion with the Chairman.<sup>171</sup>

---

<sup>170</sup> Instructions to Sir Jonathan Swift dated 6 October 2015 (POL00114270)

<sup>171</sup> Email from Sir Jonathan Swift to Jane MacLeod and Rodric Williams dated 9 October 2015 at 07.50 (POL00233682)

Witness: Rodric David Alun Williams  
Statement Number: WITN08420100  
Exhibits: None  
Date: 11 March 2024

179. The Inquiry has asked me to comment on an email from Jane MacLeod to Sir Jonathan Swift on 22 October 2015, summarising the outcome of a meeting held between the Chairman and Sir Jonathan Swift to discuss the review process.<sup>172</sup> I do not recall attending that meeting.
180. Following the meeting between the Chairman and Sir Jonathan Swift on 22 October 2015, I was asked to support Sir Jonathan Swift and Christopher Knight by providing to them whatever information they required. We were working to a fairly tight deadline to provide documents, particularly given the time of year, but POL was committed doing this. The sources of the information provided to Sir Jonathan Swift would most likely be self-evident, enabling him to investigate further as he thought appropriate. POL's approach to the provision of documents is reflected at paragraph 3 of the Swift Review.<sup>173</sup>

*"The legal department of POL has been the source of most of the information provided to us, but we have determined what information should be provided. No information we have requested has been withheld from us and we are grateful for the assistance we have received from both POL".*

181. Although I do not recall precisely when I first saw it, I would have been sent a copy of the Swift Review very shortly after it was completed. I do not recall how widely the Swift Review was circulated or whether or not it went to the Board. The recommendations in the Swift Review were consolidated into an action grid, prepared I believe by my colleague Mark Underwood.<sup>174</sup> Advice was sought from Brian Altman KC in respect of recommendations (1), (2) and (6); Deloitte were instructed to undertake the analysis and reviews recommended

---

<sup>172</sup> Email from Jane MacLeod to Sir Jonathan Swift dated 22 October 2015 at 17.03 (POL00102617)

<sup>173</sup> See The Swift Review (POL00006355)

<sup>174</sup> The Swift Review Action Grid (POL00103106)

Witness: Rodric David Alun Williams  
Statement Number: WITN08420100  
Exhibits: None  
Date: 11 March 2024

at (3), (4), (5) and (8); and WBD were instructed to carry out recommendation (7), in coordination with Sir Jonathan Swift.

182. On 18 April 2016, POL received a draft claim form in what would become the Group Litigation (covered in detail in Part 8 of this statement, below). I discussed this development with WBD and Anthony de Garr Robinson KC, who by this time had been instructed as leading counsel for POL in the Group Litigation, and also with Sir Jonathan Swift. Given the overlap between Sir Jonathan Swift's recommendations and the issues to be litigated in the Group Litigation, Sir Jonathan Swift was content for his recommendations (which remained his recommendations notwithstanding that litigation) to be taken forward through the Group Litigation.<sup>175</sup>

#### Deloitte's Project Bramble

183. I believe that some of Sir Jonathan Swift's recommendations led to the initial instruction of Deloitte in respect of what became known as 'Project Bramble'. I do not recall having direct engagement with Project Bramble, where I believe the engagement with Deloitte was largely managed by others within POL, supported by WBD. Those closer to the work would raise any issues that might arise from them, for example as in **POL00029990**.
184. I do not know how widely the Project Bramble reports were circulated within POL, but it is unlikely to have been wider than those working on the Group Litigation. Because Deloitte's Project Bramble work was developing 'work in progress' which would inform POL's position in the Group Litigation, I do not

---

<sup>175</sup> Email from Sir Jonathan Swift to Rodric Williams dated 26 July 2016 at 15.06 (**POL00022747**)

Witness: Rodric David Alun Williams  
Statement Number: WITN08420100  
Exhibits: None  
Date: 11 March 2024

think the reports were disclosed to the CCRC. The CCRC at this time was however being updated on progress of the litigation and supplied with documents raised in it, including the expert reports prepared for the Horizon Issues Trial. I also note Brian Altman KC's advice of 26 July 2016 was that until the full reviews recommended by the Swift Review were completed (which included those being sought as part of Project Bramble) he could not advise on the extent that disclosure to defendants in criminal prosecutions brought by POL was necessary.<sup>176</sup>

## **PART 10: THE GROUP LITIGATION**

### Outline of my role in the Group Litigation

185. The majority of matters covered in this statement involved me acting in the manner described under the heading "*My role as an in-house lawyer at POL*" at paragraphs [17]-[18]. I did however play a more active role in the Group Litigation because of the scale of the litigation and my familiarity with the litigation process. For example, I recommended that a steering group be created comprising senior representatives from across different parts of the business, to ensure there was a 'client' from whom substantive instructions could be taken (the "**Steering Group**", described further at paragraph [190] below), and I helped POL structure its interactions with third parties during the Group Litigation in a way that would help assert any applicable privilege over documents relating to the legal proceedings.

---

<sup>176</sup> See paragraph 16 of the advice of Brian Altman KC of 26 July 2016 (POL00112884).



Witness: Rodric David Alun Williams  
Statement Number: WITN08420100  
Exhibits: None  
Date: 11 March 2024

186. In other respects, my role remained consistent with what I have said earlier. For example, I was the principle contact between POL and the external legal team conducting the Group Litigation at WBD. I would be a sounding board and source of information for them, monitored matters as they arose for escalation to the Steering Group, and sought updates from them on matters when required for internal management purposes or to keep track of the general "direction of travel". I do not, however, recall personally directing or undertaking substantive work myself or setting the overarching strategy, for which POL's instructions would come from the Steering Group or (as became the case more often as the Group Litigation progressed) POL's Group Executive or Board.
187. My role within POL did change as a result of the Group Litigation. Whereas the other matters covered in this statement were only ever one of many things I was doing at a given time (albeit significant ones), by mid-2018 the intensity of the Group Litigation meant I needed to focus on it full-time, so that any other matters were handled by backfilled secondee resource.
188. My main role in the Group Litigation was therefore to maintain a general overview of the constant developments as the case evolved and make sure it kept progressing towards resolution, for example by monitoring progress against deadlines, and helping to ensure the right people were linked up to deliver certain outputs. Particular examples of my role are discussed in the rest of this statement in response to specific matters raised with me by the Inquiry.
189. Reflecting on it, the Group Litigation was the critical event in my dealings with the PMR Horizon complaints, given that it enabled the concerns raised by PMRs and POL's positions on them to be consolidated, clearly articulated,

Witness: Rodric David Alun Williams  
Statement Number: WITN08420100  
Exhibits: None  
Date: 11 March 2024

forensically tested, and ultimately determined, thereby providing the best opportunity for resolution.

POL decision making in respect of the Group Litigation

190. I have been asked to comment on how POL made decisions in respect of the Group Litigation. The breadth of issues raised in the original Claim Form in the Group Litigation made clear to me that, in order to respond to the claims in an informed and timely manner, POL's lawyers would need to consult and take instructions from a central group of representatives from across the business. In around April 2016, I therefore suggested to POL's General Counsel that a Steering Group be set up for that purpose. It was initially thought that the Steering Group could meet fortnightly to work through a standard agenda, although it was always recognised that this would need to be flexible to meet the demands of the litigation. An email showing the proposed format was sent on 23 May 2016,<sup>177</sup> and its first meeting was held on 7 June 2016. The idea, as the Steering Group's Terms of Reference sought to reflect, was for the Steering Group to provide the necessary instructions to conduct the litigation to POL's external lawyers, considering both standard agenda items and specific matters for which papers would be prepared, and to escalate matters within POL as appropriate.<sup>178</sup>

191. As far as I can recall, this remained the management structure for most of the Group Litigation. In or around January 2018 the Board also decided to set up

---

<sup>177</sup> Email from Rodric Williams to Tom Wechsler and others dated 23 May 2016 at 17.57 (POL00110434)

<sup>178</sup> Email from Rodric Williams to Thomas Moran and others dated 20 June 2016 at 18.08 (POL00163037)

Witness: Rodric David Alun Williams  
Statement Number: WITN08420100  
Exhibits: None  
Date: 11 March 2024

a sub-committee dedicated to the Group Litigation. I was not party to the decision to set up that Board sub-committee, but I recall that it was intended to afford a smaller group of Board members sufficient time to consider the litigation (which was nearing the first, Common Issues trial) where full Board meetings did not allow enough time given all the other matters on the Board's agenda. The Board sub-committee therefore met separately shortly before each Board meeting and I sought to align those meetings with the litigation timetable. I do not recall routinely attending Group Executive, Board or Board sub-committee meetings in the earlier stages of the Group Litigation, but I did on occasion (for example when POL's leading counsel attended). I did however start to attend these meetings more regularly following the handing down of the Common Issues Judgment in March 2019.

#### The early stages of the Group Litigation

192. I view the early stages of the Group Litigation as beginning when we received the Claim Form in April 2016. That set out brief details of the claim, and we were told by Freeths LLP, the solicitors representing the claimants, that these would be more fully set out in a Letter of Claim which would shortly follow. WBD were immediately instructed and asked to identify potential leading counsel to act for POL. The Inquiry has shown me an action list sent to me by Andy Parsons, the lead partner on the Group Litigation, following a meeting we had on or about 20 April 2016.<sup>179</sup> While I do not recall the details of this specific meeting, I believe the matters set out in the 20 April 2016 action list were the sort of preliminary issues that POL might need to address following receipt of

---

<sup>179</sup> Email from Rodric Williams to Mark Underwood dated 21 April 2016 at 12.51 (POL00041136)

Witness: Rodric David Alun Williams  
Statement Number: WITN08420100  
Exhibits: None  
Date: 11 March 2024

the Claim Form and hence were likely to have been discussed shortly after its receipt.

193. The Inquiry has asked me to comment on an action point in that list, referencing document preservation. Document preservation is a key aspect of all litigation, and around this time I recall sending emails to several distribution lists within POL notifying them of the litigation and the requirement to secure and preserve documents they held.<sup>180</sup> A WBD associate worked to follow this up and identify the potential sources of documents so that they would be available for disclosure, which eventually led to a pool of many millions of documents being corralled for potential use in the litigation. This was not a straightforward task given the broad allegations made, the absence of particulars of claim and POL's document management, but I note that the vast majority of documents used in the litigation were disclosed by POL and enabled the claimants successfully to prove their claims.

194. POL was also aware that some documents were held by third parties outside the scope of its control, such as Royal Mail and Fujitsu. At this point there was a lack of particularisation to the pleadings, so the scope of disclosure and documents required from these third parties was unclear.

#### Legal professional privilege

195. The Inquiry has asked me whether POL sought to maintain confidentiality and/or legal professional privilege over information relevant to the discovery and rectification of BEDs, or over remote access, or over POL's preparation for

---

<sup>180</sup> For example, Email from Rodric Williams to Alwen Lyons and others dated 20 April 2016 at 21.53 (POL00255859)

Witness: Rodric David Alun Williams  
Statement Number: WITN08420100  
Exhibits: None  
Date: 11 March 2024

the Group Litigation. I believe it was always understood that legal professional privilege does not apply to facts, so the facts about BEDs and remote access would not attract privilege. It is, however, possible (and indeed usual practice) to claim legal professional privilege over communications between a lawyer and their client for the purpose of giving or receiving legal advice. The same applies to communications between a lawyer and their client or a third party for the purpose of obtaining advice or information in connection with existing or reasonably contemplated litigation. In both cases, this applies to communications that contain or are informed by factual information. I consider it to be professionally essential to seek to safeguard and maintain a client's legal professional privilege as far as possible in the context of litigation, and I do not recall any instruction from POL to waive privilege over documents qualifying for it.

196. I was consulted on or informed of certain decisions about privileged documents, but my recollection is that this was infrequent. In the Group Litigation, the disclosure process, which included review of documents for legal professional privilege, was (as it had to be given its scale) managed by the external legal team seeking to follow the court ordered disclosure process.
197. As noted at paragraph [185] above, I helped POL manage its interactions with third parties during the Group Litigation, and sought to do so in a way that would maintain legal professional privilege over documents. In particular, after the claim was filed POL sought advice in May-June 2016 on the implications of the Group Litigation for POL's ongoing work in response to the Swift Review given



Witness: Rodric David Alun Williams  
Statement Number: WITN08420100  
Exhibits: None  
Date: 11 March 2024

its apparent overlap with the Group Litigation claims. The Inquiry has shown me two documents that relate to this advice.<sup>181</sup>

198. As described at paragraph [181] above, the Swift Review made a number of recommendations on which POL had begun work in February 2016. When Antony de Garr Robinson KC was instructed, he was asked to advise on this, and expressed the firm view that this work should be taken forward through the Group Litigation. I do not now recall the full details of the conference, but the WBD letter is a fair summary. I thought the advice was sensible for two reasons. It would strengthen POL's claim to legal professional privilege over communications in the Group Litigation on matters which had also been raised by the Swift Review, and it would also enable POL to consolidate work which would otherwise have had to proceed in parallel (and likely duplicative) processes. However, given that following Antony de Garr Robinson KC's advice would affect POL's response to the Swift Review, I asked WBD to record his advice in a letter<sup>182</sup> which could be shared with Sir Jonathan Swift to see if he was comfortable with the approach POL was now proposing to take. In reply, Sir Jonathan Swift confirmed that he was comfortable with POL dealing with his recommendations as part of the Group Litigation rather than separately.<sup>183</sup>

199. The Inquiry has asked me who gave advice to the Chairman or others on whether to provide the Swift Review to the Board, UKGI (which manages the Government's investment in POL) and/or HMG. The Swift Review was

---

<sup>181</sup> Email from Rodric Williams to Gavin Matthews dated 17 June 2016 at 11.12 (POL00041242); and Letter from WBD to POL 'Bates & others v Post Office Limited' dated 21 June 2016 (POL00006601)

<sup>182</sup> Letter from WBD to POL 'Bates & others v Post Office Limited' dated 21 June 2016 (POL00006601)

<sup>183</sup> Email from Rodric Williams to Sir Jonathan Swift dated 26 July 2016 at 10.35 (POL00006600), attaching letter from WBD (POL00006601); and Email from Sir Jonathan Swift to Rodric Williams dated 26 July 2016 at 14.06 (POL00022747)

Witness: Rodric David Alun Williams  
Statement Number: WITN08420100  
Exhibits: None  
Date: 11 March 2024

independent legal advice to the Chairman. I do not know who else the Swift Review was shared with as I did not have any direct contact with the Chairman over it. My focus at this time was instead on taking forward its recommendations.

200. As noted at paragraph [181] above, one of the recommendations in the Swift Review was that POL seek independent criminal law advice as to whether the decision to charge a PMR with theft and false accounting could undermine the safety of any conviction for false accounting where (a) the conviction was based on a guilty plea, following which/or in return for which the theft charge was dropped, and (b) there had not been a sufficient evidential basis to bring the theft charge.<sup>184</sup> Brian Altman KC was therefore consulted on this, and the scope of his review exercise was then discussed with Sir Jonathan Swift. Once the scope was confirmed, Brian Altman KC undertook the review and provided his written advice to WBD on 26 July 2016,<sup>185</sup> who forwarded it to myself and others at POL.<sup>186</sup> POL's focus by that time was on the Group Litigation, and in particular on responding to the claimants' Letter of Claim for which a Letter of Response was being drafted. WBD noted when circulating the outcome of the review that Brian Altman KC had also confirmed it was consistent with the relevant parts of the Letter of Response, and that consequently they did not believe any further action was required.

201. I have been asked to comment on an extract from paragraph 208 of Brian Altman KC's review. I note that he proceeded to address the matters raised in

---

<sup>184</sup> Recommendation (1) of the Swift Review (**POL00006355**)

<sup>185</sup> Brian Altman KC advice 'Review of Post Office Limited Criminal Prosecutions' dated 26 July 2016 (**POL00112884**)

<sup>186</sup> Email from Andy Parsons to Rodric Williams and others dated 26 July 2016 at 12.55 (**POL00022754**)

Witness: Rodric David Alun Williams  
Statement Number: WITN08420100  
Exhibits: None  
Date: 11 March 2024

that paragraph in the subsequent and final paragraphs of his review. Given that POL's focus was at the time on progressing the Group Litigation, I do not believe any further action was taken in connection with the review.

#### **PART 10.1: POL'S OVERALL STRATEGY DURING THE GROUP LITIGATION**

202. At paragraphs [190] to [191] above, I outlined the role of the Steering Group and mentioned that papers would be prepared for that body on specific issues where instructions or oversight were required. The Inquiry has asked me to comment on two papers of this kind prepared by WBD for the Steering Group meeting on 11 September 2017.<sup>187</sup> The purpose of documents like these was to inform and stimulate discussion within the Steering Group, with a view to confirming the approach POL would take. The context for these two papers was that by this time, POL had carried out the initial phase of work required to respond to the Letter of Claim, and had sent its Letter of Response on 28 July 2016,<sup>188</sup> following which there was one further exchange between the parties in October and November 2016. All of this was done with a view to obtaining constructively an understanding of the claimants' case and the issues POL would have to address, so as to determine the best way to manage the Group Litigation to resolution. By the time of the first Case Management Conference ("**CMC**") in the Group Litigation in October 2017, POL was much better informed about the case so needed to take a step back and make decisions about the

---

<sup>187</sup> WBD Decision Papers for Steering Group meeting dated 11 September 2017 (**POL00006380**); and WBD Paper for Steering Group meeting 'Litigation Strategy Options' dated 11 September 2017 (**POL00006379**)

<sup>188</sup> Final version of draft Letter of Response (**POL00041260**)

Witness: Rodric David Alun Williams  
Statement Number: WITN08420100  
Exhibits: None  
Date: 11 March 2024

“*general direction of travel*”, i.e. the approach to take to the litigation as a whole, which would then also inform POL's position at the first CMC specifically.

203. I believe the two Steering Group papers reflected the ‘blue sky thinking’ that was done on the possible approaches which could be taken to the Group Litigation, so that POL could consider a variety of options. I do not believe the options presented were necessarily mutually exclusive, nor do I believe were they ‘set in stone’, such that (as the document notes) POL's position was able to develop (as it would need to) as the litigation progressed. That said, some of the options were unlikely to be given serious consideration: in particular “*Settle now*” (although it was always contemplated and indeed expected that the litigation would ultimately be resolved through settlement), and “*Attrition*” (which I do not recall being seriously considered or pursued at any stage of the litigation).
204. Ultimately, it became clear that in order to resolve the Group Litigation, the parties would need to focus on two fundamental areas that were common to most of the claimants' claims, but on which the parties were diametrically opposed such that the court's intervention on them would be necessary. These were the nature of the legal relationship between POL and PMRs, and the reliability of Horizon, both of which were discussed in the options paper. I believe the determination of these issues through the Common Issues and Horizon Issues trials was essential to POL's goal of resolving the litigation and the PMR's Horizon complaints, as it represented the means to test independently and resolve with certainty the claims and POL's position on them



Witness: Rodric David Alun Williams  
Statement Number: WITN08420100  
Exhibits: None  
Date: 11 March 2024

which, as the matters discussed elsewhere in my statement show, it had thus far failed to do.

205. The documents also reflect that this was a large-scale High Court civil law claim focused on issues like the construction of commercial contracts and IT system performance. The claim was brought by a respected commercial law firm backed by substantial litigation funding. It was not about matters of criminal law, which were the domain of other courts. I therefore believe it was appropriate that one factor being considered when assessing how POL should respond to the claims was the costs implications the litigation would have, including for the claimants' funders. This was not however the only consideration.

Letter from Freeths of 16 October 2017

206. The Inquiry has asked me to consider a letter from Freeths to WBD and an email commenting on that letter from Andy Parsons, both dated 16 October 2017. These relate to the Fourth Witness Statement of Andy Parsons, submitted ahead of the first CMC.<sup>189</sup> At that time in October 2017, I was heavily involved in an unrelated piece of urgent litigation concerning an important business objective, so I was not as engaged in the Group Litigation as I was at other times. I do not specifically recall this letter from Freeths or the related email, but I do not believe POL or WBD ever adopted or pursued a strategy of wasting time on side issues, nor do I believe allegations of professional misconduct were made to obtain an advantage in the litigation.

---

<sup>189</sup> Letter from Freeths to WBD 'Fourth Witness Statement of Mr Parsons' dated 16 October 2017 (POL00041510); Email from Andy Parsons to Rodric Williams dated 16 October 2017 at 09.46 (POL00041509); and Fourth Witness Statement of Andy Parsons dated 9 October 2017 (POL00000444)



Witness: Rodric David Alun Williams  
Statement Number: WITN08420100  
Exhibits: None  
Date: 11 March 2024

207. The litigation proceeded in accordance with a very tight timetable, which generated substantial amounts of inter-parties correspondence. Some of this would be shared with me either for my input or so I could get a sense of the direction of travel for how matters were progressing. Given the scale of the litigation and the pace at which it was required to move, I believe it was inevitable that some of the correspondence would be intemperate, but my general recollection of the letters I saw was that they enabled the litigation to advance.

Judgments of 10 November 2017 and 17 October 2018

208. I have been asked to consider the judgment of *Bates & Others v. Post Office Limited* [2017] EWHC 2844 (QB), which was sent out in draft to the parties on 8 November 2017 and handed down on 10 November 2017, after the first CMC. On reading the judgment, I identified the criticisms that the trial judge had made in it about the parties' behaviour to the General Counsel and a small group of colleagues. While these criticisms were expressly levelled at the parties "*more or less equally*", I considered that the main message was that the parties would need to co-operate more if they were to meet the tight timetable, failing which "*draconian costs orders*" could result. I do not believe this led to any change in the strategy for the litigation because, as noted above and in my email at the time, I believe POL had been trying to cooperate with the claimants for the expeditious resolution of the litigation. I nevertheless added (with WBD copied) that POL not only needed to cooperate but also be *seen* to be cooperating.<sup>190</sup>

---

<sup>190</sup> Email from Rodric Williams to Jane MacLeod and others dated 9 November 2017 at 09:47 (POL00041527)

Witness: Rodric David Alun Williams  
Statement Number: WITN08420100  
Exhibits: None  
Date: 11 March 2024

209. The Inquiry has also asked me to consider the judgment in *Bates & Others v. Post Office Limited* [2018] EWHC 2698 (QB), which the parties received on 15 October 2018,<sup>191</sup> shortly before the start of the first, Common Issues trial on 5 November 2018. As I noted in the email I sent shortly after receipt of the judgment,<sup>192</sup> I was disappointed to read the further criticisms that the trial judge had made of the parties' conduct of the litigation, because as far as I was concerned, POL had been trying to progress the case properly. I believe POL was doing so. Indeed, both trials remained on track to start within the tight timetable ordered and costs budget by the court and no sanction had been sought or ordered. My contemporaneous emails show that an update on the judgment was provided to UKGI on 16 October 2018, and that a briefing was held with UKGI on 17 October 2018, which seemed (insofar as the Group Litigation was concerned) to focus on potential outcomes and contingency planning. I do not recall any challenge concerning the conduct of the litigation arising from these events.

#### **PART 10.2: INFORMATION SHARING**

210. As I mentioned in paragraph [195] above, POL had a general (and I believe understandable) concern about maintaining confidentiality and, where relevant, legal professional privilege, over the materials being created in connection with the PMRs' Horizon complaints and its conduct of the Group Litigation. I believe this was reasonable given the third party scrutiny being given to POL's

---

<sup>191</sup> Prior to it being handed down on 17 October 2018.

<sup>192</sup> Email from Rodric Williams to Andy Parsons and others dated 16 October 2018 at 02.04 (POL00258011)

Witness: Rodric David Alun Williams  
Statement Number: WITN08420100  
Exhibits: None  
Date: 11 March 2024

approach, and the potential for the conduct of its defence to be undermined if that confidentiality was not maintained.

211. The Inquiry has asked me to comment on an email chain concerning sharing information about the Group Litigation with UKGI.<sup>193</sup> I recall that, in mid-2016, an official from the Department of Business, Innovation and Skills (as it then was) approached POL with a request for a discussion with a member of the Department's legal team about the Group Litigation. That meeting took place on 4 August 2016, which I attended as far as I recall with Patrick Bourke and Andy Parsons. At the meeting we gave an overview of the litigation as we saw it at that time, and essentially asked that POL be permitted to conduct the litigation without external influence. I do not recall taking any specific actions away from this meeting.
212. I do not know what prompted UKGI to seek a more structured information flow about the Group Litigation in February 2018, as referred to in the first email in the chain I have been asked to consider. In response to that request, I was asked by POL's General Counsel to try to formalise information sharing arrangements in a manner which could, so far as possible, protect any applicable legal professional privilege in the information that would need to be shared. As can be seen from the email chain there was some toing and froing between UKGI and POL over the form this should take, before the information sharing protocol was agreed in or around June 2018.<sup>194</sup>

---

<sup>193</sup> Email from Patrick Bourke to Rodric Williams dated 11 May 2018 at 12.02 (**POL00041770**); and UKGI / Post Office Limited Information Sharing Protocol dated 11 June 2018 (**BEIS0000079**)

<sup>194</sup> Which is the version at **BEIS0000079**.

Witness: Rodric David Alun Williams  
Statement Number: WITN08420100  
Exhibits: None  
Date: 11 March 2024

213. The Inquiry has asked me to explain my comment, in an email of 11 May 2018, that:<sup>195</sup>

*“The distinction between confidential and privileged information is artificial. There is no basis for it in law (privilege is founded on confidentiality), and I see no reason why UKGI should not treat everything they receive from us on the Group Lit as confidential (surely the need for that is obvious?).”*

This was a comment in an internal email to Patrick Bourke, Jane MacLeod and Andy Parsons, copied to Mark Underwood. With hindsight, it should perhaps have read *“the distinction between confidential and privileged information that UKGI is drawing in its comments on the draft protocol is artificial...”*. I appreciate that legal professional privilege will not apply to all confidential documents. I am also aware that confidentiality is a cornerstone for maintaining privilege, such that privilege will be lost if privileged material is not kept confidential. I was concerned that the changes UKGI wanted to make to the draft information sharing protocol would narrow its protections to only cover privileged material provided by POL. This was concerning because, particularly in litigation, the existence of legal professional privilege over a document may not be obvious (especially to someone outside of POL unaware of the document’s context). I was aware that Government provides robust protection in relation to the handling of confidential information, and I wanted that protection to apply to any documents shared by POL concerning the conduct of litigation, irrespective of whether they might also be legally privileged. This was sensible in circumstances where the presumption should be that all material being provided would be confidential and deserving of those protections given the

---

<sup>195</sup> Email from Patrick Bourke to Rodric Williams dated 11 May 2018 at 12.02 (POL00041770)

Witness: Rodric David Alun Williams  
Statement Number: WITN08420100  
Exhibits: None  
Date: 11 March 2024

sensitive matters to which it related (namely the “Postmaster Complaints” as defined). Reviewing this exchange now, it seems that this issue was swiftly resolved by applying the information sharing protocol's protections to “Privileged and Confidential Information”, defined as including both legally privileged and other confidential material.

214. Once the information sharing protocol was agreed, I provided updates to UKGI and the Department in accordance with it and I do not ever recall being challenged on POL's compliance with it.

### **PART 10.3: EARLY WORK IN THE GROUP LITIGATION PROCEEDINGS**

215. I outlined the early stages of the Group Litigation at paragraphs [192] to [193] above. The Inquiry has also asked me some specific questions, which I address below. During this time, as mentioned above at [17], I was promoted in 2017 to a more senior position within POL, from “Litigation Lawyer” to “Head of Legal - Dispute Resolution & Brand”.

#### **BEDs and remote access in the Letter of Response**

216. The Inquiry has asked me to comment on a set of documents relating to BEDs and remote access in the earliest phase of the Group Litigation.<sup>196</sup>

---

<sup>196</sup> Email from Andy Parsons to Rodric Williams and others dated 13 July 2016 at 11.02 (POL00024988), Decision Papers for Postmaster Group Action (POL00024989), Email from Andy Parsons to Mark Davies and others dated 21 July 2016 at 17.56 (POL00029998), Email from Mark Davies to Jane MacLeod dated 22 July 2016 at 10.49 (POL00030002), Email from Jane MacLeod to Paula Vennells dated 25 July 2016 at 06.27 (POL00041258), Email from Jane MacLeod to Andy Parsons dated 26 July 2016 at 20.37 (POL00110482), Email from Amy Prime to Mark Underwood and others dated 27 July 2016 at 13.44 (POL00022659), Rider: Remote Access (POL00022660), Email from Andy Parsons to Jane MacLeod and others dated 27 July 2016 at 19.50 (POL00041259) and Final version of draft Letter of Response (POL00041260)



Witness: Rodric David Alun Williams  
Statement Number: WITN08420100  
Exhibits: None  
Date: 11 March 2024

217. In July 2016, WBD were working with POL's counsel on POL's response to the claimants' Letter of Claim. They were preparing a draft Letter of Response from material to which they had access, or that I or others within POL could provide, which would then be circulated to POL for consideration and comment. The draft Letter of Response raised a number of specific issues on which WBD wanted the Steering Group's instructions, and (in line with the Steering Group's operating practices outlined in paragraph [190] above) these were distilled into separate papers. This can be seen from the email chain dated 13 July 2016 to which I have been referred by the Inquiry.<sup>197</sup> In the example paper given to me to comment on, WBD's recommendation was to confront the issue of BEDs head-on by identifying the three BEDs that had been noted by Second Sight, but that POL should also recognise that this would not be an exhaustive list of BEDs in case more emerged later. This position was ultimately reflected in the Letter of Response, at paragraph 3.10.1(a) and Schedule 6.<sup>198</sup> I do not recall any specific disagreement about this (or indeed on any of the other decision papers) within the Steering Group, whose working practice was to discuss and give views on an issue before reaching a consensus on it.
218. Shortly before the Steering Group meeting at which the Letter of Response papers were discussed, WBD raised an issue with remote access having been identified through a combination of responding to the Letter of Claim and the further work Deloitte was doing (referred to in paragraph [183] to [184] above).<sup>199</sup> At paragraphs [141] to [149] above, I explained that POL's position

---

<sup>197</sup> Email from Andy Parsons to Rodric Williams and others dated 13 July 2016 at 11.02 (**POL00024988**) and Decision Papers for Postmaster Group Action (**POL00024989**)

<sup>198</sup> Email from Andy Parsons to Jane MacLeod and others dated 27 July 2016 at 19.50 (**POL00041259**) and Final version of draft Letter of Response (**POL00041260**)

<sup>199</sup> Email from Andy Parsons to Jane MacLeod and others dated 13 July 2016 at 15.40 (**POL00029990**)

Witness: Rodric David Alun Williams  
Statement Number: WITN08420100  
Exhibits: None  
Date: 11 March 2024

on remote access up to the point of receiving the Swift Review had focused on 'balancing transactions', and not the 'superuser access' issue (first discussed at paragraph [144] above) which had been missed when POL was responded to *Panorama* (see paragraph [172] above), and on which the Swift Review had recommended further investigation (see paragraphs [181] and [183] above). The focus was initially on correctly expressing the position in the Letter of Response, but there followed a discussion about managing the impact of this change of position.<sup>200</sup> The fact POL had not previously commented on Fujitsu 'superusers', and that this possibility was inconsistent with past statements, was escalated to Paula Vennells by Jane MacLeod, and may have been escalated to the Board if thought appropriate.<sup>201</sup>

219. The final Letter of Response was very lengthy at some 99 pages including schedules, and addressed a large number of issues. I was aware of the process that WBD and counsel followed to prepare this letter, namely using existing materials and seeking specific input from subject matter experts to prepare a draft, which, when sufficiently advanced, was circulated to me and others for comment.<sup>202</sup> I then reviewed (as did others) advanced drafts of the Letter of Response and provided comments on it based on my own understanding of the issues it traversed. I have no reason to believe this process did not ensure the letter accurately reflected POL's understanding of, and positions on, the various issues as at that time.

---

<sup>200</sup> Email from Mark Davies to Jane MacLeod dated 22 July 2016 at 10.49 (POL00030002)

<sup>201</sup> Email of Jane MacLeod to Paula Vennells dated 25 July 2016 at 06.27 (POL00041258)

<sup>202</sup> Email from Andy Parsons to Thomas Moran and others dated 16 July 2016 at 14.09 (POL00243250)

Witness: Rodric David Alun Williams  
Statement Number: WITN08420100  
Exhibits: None  
Date: 11 March 2024

### Generic Defence and Counterclaim

220. The Inquiry has asked me to comment on a number of paragraphs of POL's Generic Defence and Counterclaim.<sup>203</sup> As with the Letter of Response, discussed in paragraphs [202] above, I was not involved in the substantive drafting, but did review advanced drafts of the document.<sup>204</sup> As noted at paragraph [185] to [186] above, my role as in-house lawyer in processes like this was mainly to track the work of the external legal team against deadlines, ensure it was broadly in line with POL's expectations (or address issues that were not), and to escalate when challenges arose (such as not finding information, people being unresponsive etc.). I believe the process for preparing the Generic Defence and Counterclaim was essentially the same as that for the Letter of Response, and again I will have provided questions and comments on this document to the external team to based on my own understanding of the issue being traversed. I have also located emails from WBD to Fujitsu and Deloitte asking them to review, comment on and identify any inaccuracies in extracts from the claimants' draft Generic Particulars of Claim and POL's Generic Defence (including as referenced in the Inquiry's question 116).<sup>205</sup> Again as with the Letter of Response, I have no reason to

---

<sup>203</sup> Letter from WBD to Freeths dated 18 July 2017 enclosing POL's Generic Defence and Counterclaim (**POL00003340**)

<sup>204</sup> Email from Rodric Williams to Andy Parsons dated 8 July 2017 at 06.54 (**POL00249676**)

<sup>205</sup> Email from Andy Parsons to Fujitsu Legal Defence (Chris Jay) dated 4 July 2017 at 21.38 (**FUJ00085337**), attaching Horizon sections of Draft Generic Defence (**FUJ00085337**); Email from Andy Parsons to Mark Westbrook dated 4 July 2017 at 21.40 (**POL00249612**); and Email from Chris Jay to Andy Parsons dated 5 July 2017 at 14.50 (**POL00249635**)

Witness: Rodric David Alun Williams  
Statement Number: WITN08420100  
Exhibits: None  
Date: 11 March 2024

believe that this process did not ensure the Generic Defence and Counterclaim accurately reflected POL's understanding of matters at the time it was made.

#### **PART 10.4: DISCLOSURE**

##### Disclosure of investigations guidelines (October 2016)

221. The Inquiry has asked me to comment on an email from WBD to me on 5 October 2016 relating to the disclosure of investigations guidelines.<sup>206</sup> I do not recall this email; at this time, I was dealing with the unrelated piece of urgent litigation concerning an important business objective referred to in paragraph [206] above and, as the email was marked "*not urgent but ... to consider ... when you get a chance*", I may not have paid particular attention to it. I have searched for a response but been unable to locate one, nor any emails afterwards that shed light on the issue. I do not know whether, or, if so, when the investigation guidelines referred to in the emails were disclosed, but I do not believe POL sought to "*suppress*" disclosure during the litigation. I note the email was sent relatively early in the litigation and before orders for disclosure were made, and my recollection of POL's approach to disclosure was to provide to the claimants' the disclosure they required so far as that was reasonably possible. This to me was because, as referred to at [204] above, I believe it was POL's ultimate aim in the Group Litigation to reach a conclusive outcome to the PMR Horizon complaints, and this would not be possible if the outcomes could be undermined (whether through the courts or other avenues) on grounds of inadequate disclosure. As POL sought to explain in its Closing Submissions to

---

<sup>206</sup> Email from Amy Prime to Rodric Williams dated 5 October 2016 at 11.01 (POL00038852)



Witness: Rodric David Alun Williams  
Statement Number: WITN08420100  
Exhibits: None  
Date: 11 March 2024

the Horizon Issues trial,<sup>207</sup> giving disclosure to the claimants was not always straightforward given some of the wide-ranging requests and at times absence of particulars of claim to inform the parameters of disclosure. However, as already noted at [193] above, POL did provide substantial disclosure to the claimants, which they did not take issue with through any applications to the court, and which enabled them to prove their case.

#### Disclosure of KELs and PEAKs

222. I do not now recall any direct conversations with WBD, Fujitsu or others in POL concerning the KEL log or access to it, although it is clear that I was copied in to email correspondence about it.<sup>208</sup> My overarching recollection about the KEL is that it was something which Fujitsu created, used and stored, to which neither POL nor anyone else outside Fujitsu had access. POL was therefore dependent on Fujitsu for information about and access to the KEL. The same applied to PEAKs, which I do not recall being aware of prior to the Group Litigation and whose function only became apparent to me as the litigation progressed.
223. In preparing this statement, I have considered the 'Post Office Submissions in relation to the Fujitsu Contract' filed in the Group Litigation on 31 July 2019.<sup>209</sup> This fairly summarises my understanding of the position with respect to the KEL. It explains that POL felt disclosure of the KEL (which would not be straightforward given the technical means by which it was held) should be addressed as part of Group Litigation disclosure generally. Nevertheless, in

---

<sup>207</sup> Closing submissions on behalf of Post Office Ltd to the Horizon Issues trial (see paragraphs 1113-1118) (**POL00277546**)

<sup>208</sup> For example, Email of Andy Parsons to Pete Newsome dated 19 September 2017 at 09.56 (**POL00041479**)

<sup>209</sup> Post Office submissions in relation to the Fujitsu contract dated 31 July 2019 (**POL00042858**)



Witness: Rodric David Alun Williams  
Statement Number: WITN08420100  
Exhibits: None  
Date: 11 March 2024

September 2017 POL offered the claimants' IT expert Jason Coyne inspection of the KEL at Fujitsu's premises. I believe this offer was consistent with the approach to disclosure discussed in paragraph [221] above, and is referred to in paragraph 39 of the Fourth Witness Statement of Andy Parsons.<sup>210</sup> I recall that in order for this inspection to take place Fujitsu required Jason Coyne to sign a non-disclosure agreement, and that I was a party to communications around this. Following Jason Coyne's inspection of the KEL at Fujitsu's premises in November 2017, it was agreed that the KEL should be disclosed, as it was in May 2018 once a technical solution had been created to enable this.

224. I therefore do not believe POL had any sustained objection to disclosing the KEL, and as paragraph 27 of the 'Post Office Submissions in relation to the Fujitsu Contract' note, the KEL was not the subject of any contention by the time the Horizon Issues trial was ordered. I note that when, after the Horizon Issues trial had concluded but before judgment had been given, Fujitsu revealed to POL that a large number of versions of the KEL previously thought to have been destroyed were in fact available, the claimants and the court were promptly notified of this so that the claimants could inspect them if required.
225. The documents relating to KEL disclosure to which the Inquiry has drawn my attention show that WBD were in dialogue with Fujitsu about the KEL disclosure in September 2017.<sup>211</sup> I do not remember playing a role in the drafting of WBD's letters to Freeths or Andy Parsons' witness statement addressing the KEL, but

---

<sup>210</sup> Fourth Witness statement of Andy Parsons dated 9 October 2017 (POL00000444)

<sup>211</sup> Freeths' letter to Andy Parsons dated 13 September 2017 (POL00003414) and Email from Andy Parsons to Pete Newsome and others dated 19 September 2017 at 09.56 (POL00041479)

Witness: Rodric David Alun Williams  
Statement Number: WITN08420100  
Exhibits: None  
Date: 11 March 2024

reading them now the contents fit with my memory of what Fujitsu was saying about the KEL at that time.<sup>212</sup> The Inquiry has asked me to comment on a noting paper for a Steering Group meeting on 16 October 2017, relating to this issue.<sup>213</sup> This was prepared by WBD to give an overview of where matters were in the litigation, and was designed to stimulate discussion so POL could give instructions for the conduct of the first CMC. I note this says that POL would continue to 'push back' on the KEL, which I take to mean that POL would maintain its position as set out in the Fourth Witness Statement of Andy Parsons, namely to offer inspection of the KEL notwithstanding POL's then pleaded case that it was not relevant.

#### Disclosure to the CCRC

##### *Generic Defence and Counterclaim and its queries on KELs*

226. Although the Group Litigation was not concerned with criminal law matters, as noted at paragraph [205] above, POL understood that it would give rise to information which might be relevant to them and to the CCRC's investigations. Accordingly, in addition to the specific requests for information received from the CCRC, POL sought to keep it updated on the litigation as it progressed. We also sought to keep Cartwright King engaged so that they were aware of the progress of the Group Litigation and could advise POL accordingly.

---

<sup>212</sup> Email from Andy Parsons to Pete Newsome and others dated 20 September 2017 at 17.31 (POL00041480), Draft letter from WBD to Freeths dated 20 September 2017 regarding preservation of Horizon data (POL00041481), Draft letter from WBD to Freeths regarding KEL (POL00041482), Letter from WBD to Freeths dated 22 September 2017 regarding KEL (POL00003480) and paragraphs 33 to 41 of Fourth Witness statement of Andy Parsons dated 9 October 2017 (POL00000444)

<sup>213</sup> Noting paper: Update on Litigation Strategy for meeting on 16 October 2017 (POL00006431)

Witness: Rodric David Alun Williams  
Statement Number: WITN08420100  
Exhibits: None  
Date: 11 March 2024

227. The Inquiry has drawn my attention to two email chains relating to this from January and July 2017.<sup>214</sup> The first of these illustrates how I liaised with external lawyers to support the CCRC's work during the Group Litigation. I sent POL's Generic Defence and Counterclaim to the CCRC in response to their request for it, and also provided the Generic Particulars of Claim for ease of reference.<sup>215</sup> I believe I flagged paragraph 50(4) to them to ask whether this dealt with the questions they had separately raised in relation to the KEL because this represented the most recent statement of POL's position on the issue. The email chain shows that I continued my practice of liaising with WBD (Paul Loraine) as POL's external legal support for responding to the CCRC given my own lack of capacity, which in this case also involved WBD drafting questions Fujitsu would need to answer. The July 2017 email chain shows POL's continued engagement with the CCRC over the further questions it was raising, consistent with the understanding described at paragraph [222] above. I facilitated a visit by the CCRC to Fujitsu in Bracknell to view the 'live' KEL in March 2018 and POL remained open to taking forward any further questions the CCRC might have on the KEL.

*Correspondence regarding PEAKs in late 2018*

228. The Inquiry has asked me to comment on an exchange of letters between WBD and Freeths on 2 October and 28 November 2018, relating to the disclosure of PEAKs.<sup>216</sup> In between the dates of the two letters I note that POL's strike-out

---

<sup>214</sup> Email from Paul Loraine to Rodric Williams and others dated 9 January 2017 at 10:56 (POL00025358) and Email from Paul Loraine to Rodric Williams dated 14 August 2017 at 12:36 (POL00041458)

<sup>215</sup> Email from Rodric Williams to Miles Trent dated 26 July 2017 at 16:31 (POL00041458)

<sup>216</sup> Letter from Freeths to WBD dated 2 October 2018 regarding PEAK disclosure (POL00003386) and Letter from WBD to Freeths dated 28 November 2018 regarding expert reports (POL00003363)

Witness: Rodric David Alun Williams  
Statement Number: WITN08420100  
Exhibits: None  
Date: 11 March 2024

application in the Group Litigation was heard and determined (on 10 and 17 October 2018 respectively) and the Common Issues trial commenced (on 7 November 2018). This was therefore a very busy time. I now understand that PEAKs were an internal log of the fixes applied to known Horizon errors which was kept by Fujitsu. I do not recall these specific letters and, as I note below at [237], I was less involved in the Horizon Issues trial preparation given its subject matter and other demands. In light of that, and the issue appearing to be an interlocutory one being progressed by the external legal team, it may not have required or been given my attention. Reviewing the position now, it seems the existence of PEAKs had been confirmed to Freeths in December 2017 and, following a request to access them on 4 June 2018 from the claimants' expert, Jason Coyne, POL made arrangements for both parties' experts to have access at Fujitsu's premises on 15 June 2018. In September 2018, once technical issues with extracting them from the Fujitsu database had been resolved, the PEAKs were disclosed without affecting the trial timetable.

#### **PART 10.5: PREPARATION FOR THE COMMON ISSUES TRIAL**

##### **My involvement in preparation for the Common Issues trial**

229. As I explained at paragraph [204] above, I believe POL wanted the Group Litigation to resolve the PMRs' Horizon complaints. Determining the Common Issues and confirming the legal relationship between POL and the PMRs was an essential step towards this, given that it would bridge the gap between the parties' often diametrically opposed positions on them. WBD and the counsel team were responsible for preparing the case for the Common Issues trial. My role was as described at paragraphs [185] to [188] above.



Witness: Rodric David Alun Williams  
Statement Number: WITN08420100  
Exhibits: None  
Date: 11 March 2024

*Disclosure and redactions*

230. Disclosure and the redaction of documents were dealt with by WBD, which employed what I consider to be a standard team structure for large scale disclosure exercises, where responsive documents are stored in an electronic document review platform and identified through the use of search terms. The majority of responsive documents are then reviewed by paralegals in the first instance, escalating matters through increasingly more qualified lawyers as the document under review may require. Disclosure in this case was a very substantial undertaking, with approximately 18 million documents being considered for review and over 500,000 disclosed within a tight time frame, enabling the Common Issues and Horizon Issues trials to proceed as directed. Of the disclosed documents, my understanding is that fewer than 500 had redactions, on grounds of either privilege or confidentiality.

231. The Inquiry has specifically highlighted the redactions to the 'Zebra Action Summary' in the trial bundle.<sup>217</sup> I was typically not involved in day-to-day decisions on disclosure and redactions. However, I received an email from WBD on 26 July 2018 raising a number of questions about privilege in this document.<sup>218</sup> I do not now recall this specific issue, but having reviewed my emails from this time, I believe I discussed it with WBD the next day by telephone, which I presume addressed the issues raised and enabled the appropriate disclosure to be made.

---

<sup>217</sup> Zebra Action Summary (redacted) (POL00002356) and Zebra Action Summary (unredacted) (POL00027054)

<sup>218</sup> Email from Amy Prime to Rodric Williams dated 26 July 2018 at 19.14 (POL00255949)



Witness: Rodric David Alun Williams  
Statement Number: WITN08420100  
Exhibits: None  
Date: 11 March 2024

*Case on the “settle centrally” button*

232. The Inquiry has asked me how POL’s case on the “settle centrally” button was prepared. I refer to my comments at paragraphs [217] and [220] above on the process adopted to prepare POL’s Letter of Response and Generic Defence and Counterclaim. As the factual basis POL’s case on “settle centrally” was an operational matter, it was not something I could comment on meaningfully and do not therefore think I will have made any material contribution to it. The Inquiry has also raised cross-examination of the claimants, which was largely a trial conduct matter determined by counsel. I do recall one discussion during the Horizon Issues trial about whether, in cross-examination, POL’s counsel should put to a PMR witness that evidence they had given might amount to false accounting. Although this was not actively pursued I thought it appropriate to pose the question given it was I recall part of POL’s case that false cash declarations would make it impossible to determine when and how a branch shortfall arose.<sup>219</sup>

*Angela van den Bogerd’s witness statement*

233. Preparation of witness evidence for the Common Issues trial was dealt with directly between WBD and the relevant witnesses. I did however read and comment on the draft witness statements in much the same way I did the drafts of POL’s Letter of Response and Generic Defence, namely to understand the gist of the evidence being given and make comments from my own knowledge where appropriate.

---

<sup>219</sup> See 13 and 184 of the Generic Defence and Counterclaim (POL00003340)

Witness: Rodric David Alun Williams  
Statement Number: WITN08420100  
Exhibits: None  
Date: 11 March 2024

234. Angela van den Bogerd was the lead corporate witness for POL in the Common Issues trial, so I looked at her statement a little more closely than others. On 20 August 2018 I was copied into emails between Andy Parsons of WBD and Angela van den Bogerd over the preparation of her witness statement, and comments were marked for my attention.<sup>220</sup> Angela van den Bogerd gave evidence on a number of matters reflecting POL's corporate position, for which there was no readily identifiable individual witness, so some of her evidence will have been based on information drawn from across POL's business. For example, her statement included information to contextualise various POL processes which had changed over time. My role was to address any comments specifically raised for me or point things out based on the knowledge I had developed of POL's business. My response on 23 August 2018 is an example of me flagging to Andy Parsons some information within my personal knowledge about work I knew had been done within POL (e.g. relating to ATMs and MoneyGram), in case it was helpful or relevant to include in what was essentially a corporate statement.
235. The Inquiry has asked me why I included in my email to Andy Parsons the following 'overarching point':<sup>221</sup>

*"One overarching point on the witness statements: please make sure you are giving the witnesses the "health warning" on signing a statement of truth, i.e. they need to be confident that what they are saying is true to the best of their knowledge and belief, and that they don't accept something just because it's been through the lawyers."*

---

<sup>220</sup> Email from Angela van den Bogerd to Andy Parsons and others dated 20 August 2018 at 22.55 (POL00041955) and Draft witness statement of Angela van den Bogerd (POL00041956)

<sup>221</sup> Email from Rodric Williams to Andy Parsons dated 23 August 2018 at 23.26 (POL00041986)

Witness: Rodric David Alun Williams  
Statement Number: WITN08420100  
Exhibits: None  
Date: 11 March 2024

I sent this at the time I had been reviewing and commenting on all of the POL witness statements for the Common Issues trial (of which Angela van den Bogerd's was one of, if not the, last), so the comment was of general application to all of POL's witnesses. Throughout my career it has been my practice to make this point explicitly to witnesses, even when they are experienced professionals, so that there is a clear understanding of the significance of what they are doing, and a paper trail recording that. I had no reason to believe that any of POL's witnesses would not be giving truthful evidence, but I did want them to be sure of what they were saying, and not, for example, feel they could rely on assumption or received wisdom.

236. I cannot comment on Mr Justice Fraser's findings at paragraph 544 of his Common Issues Judgment.<sup>222</sup> I do however believe, based on my experience of working with her, that Angela van den Bogerd would have been diligent and given evidence to the best of her knowledge and belief.

#### **PART 10.6: PREPARATION FOR HORIZON ISSUES TRIAL**

##### My involvement in preparation for the Horizon Issues trial

237. As was the case in the Common Issues trial, POL's preparation for the Horizon Issues trial was led by its external legal team at WBD and counsel. I had less involvement in POL's preparation for the Horizon Issues trial than I had done for the Common Issues trial. This was partly because I was engaged in the Common Issues trial and attended court for significant periods of that preparation, and partly because the Horizon Issues trial was not about the legal

---

<sup>222</sup> *Bates v Post Office (No 3)* [2019] EWHC 606 (QB)

Witness: Rodric David Alun Williams  
Statement Number: WITN08420100  
Exhibits: None  
Date: 11 March 2024

relationship between POL and PMRs, but about factual or expert technical evidence about Horizon on which I had less to contribute. As noted above, much of POL's case on Horizon (including key issues such as BEDs and remote access) had already been set out in documents exchanged between the parties. As that had been derived from Fujitsu subject matter experts, much of the evidence similarly needed to come from Fujitsu employees. The contribution that I could therefore make was small, and I do not recall having any material input on the preparation of POL's witness evidence for the Horizon Issues trial, or material insight into the extent of the involvement of Fujitsu personnel in that process.

### Witnesses and evidence

#### *Robert Worden*

238. The Inquiry has asked me to comment on a Steering Group 'Noting paper: Expert Report of Robert Worden'.<sup>223</sup> I believe this was intended to update the Steering Group as to the progress and overall conclusions of POL's expert witness Robert Worden, whose work as POL's appointed IT expert was of significant interest to POL. Paragraph 3.1 of the Steering Group document sets out the discussion POL's legal team was having with Robert Worden as to how to convey his opinions. I was aware that Robert Worden wanted to present his evidence in a quantitative way, using statistical analysis to demonstrate his conclusions, whereas POL had pleaded its case on a qualitative basis, so the external legal team asked him whether he could present the evidence in that

---

<sup>223</sup> Briefing note on the report of Robert Worden for Steering Group meeting on 28 November 2018 (POL00006471)

Witness: Rodric David Alun Williams  
Statement Number: WITN08420100  
Exhibits: None  
Date: 11 March 2024

way. I do not recall having any direct input into Robert Worden's evidence or these debates specifically, although I may have attended some meetings with him to get an understanding of his work given its importance to POL's case.

239. I cannot recall the detail of any discussions on this, but do recall the main concern within POL's legal team was that the quantitative analysis did not coherently convey Robert Worden's findings, which were generally positive about Horizon and supportive of POL's case on it. The feedback I had from POL's external legal team was that Robert Worden was very much his own man (as evidenced by his later volunteering of a third report to the court (see paragraph [246] below)). I was not therefore surprised that he maintained his quantitative analysis, but was pleased he also accepted the team's suggestion to present his findings in a more qualitative manner, with I believe both analyses ultimately being included in his report.

*Gareth Jenkins*

240. A conference was held in September 2018 to discuss whether to rely on Gareth Jenkins as a witness at the Horizon Issues trial. I attended that conference, along with counsel for the Horizon Issues trial, Anthony de Garr Robinson QC and Simon Henderson of counsel, Simon Clarke and Martin Smith of Cartwright King and Andy Parsons of WBD. As can be seen from the email Andy Parsons had written, which I forwarded to Cartwright King ahead of the conference,<sup>224</sup> there was a concern about using Gareth Jenkins as a witness in the Horizon Issues trial given his previous role as a prosecution

---

<sup>224</sup> Email from Rodric Williams to Simon Clarke and others dated 7 September 2018 at 13.12 (POL00042015)



Witness: Rodric David Alun Williams  
Statement Number: WITN08420100  
Exhibits: None  
Date: 11 March 2024

witness, and Simon Clarke's advice to POL of July 2013 that his credibility as an expert witness had been "*fatally undermined*". A briefing paper to the Steering Group in December 2016 had also noted that Gareth's Jenkins' credibility had been damaged such that he could not give evidence in future.<sup>225</sup> My recollection of the September 2018 conference was that a firm view was formed that Gareth Jenkins should not be called as a witness because of his previous involvement as a witness in POL prosecutions, which were not the subject of the Horizon Issues trial. An alternative Fujitsu witness was therefore sought to present Fujitsu's current understanding of the problems Horizon had experienced, which ended up being Torstein Godeseth.

#### *Robustness of the Horizon system*

241. I do not recall the first expert reports of Jason Coyne and Robert Worden causing POL concerns about the reliability of Horizon because they were, from recollection, largely positive about Horizon and indeed gave POL confidence in its case. Robert Worden's evidence remained consistently positive, but Jason Coyne's supplementary report served on 1 February 2019 recast his case to focus on some 22 bugs identified following his review of PEAKS. I was not close enough to the technical or factual detail to have firm views of my own on the overall implications of this. It was of course ultimately a matter for Mr Justice Fraser to make findings based on the evidence, including that of the experts who were producing their own reports. I do recall that my main concern with the Horizon Issues trial was about the potential impact a negative judgment about

---

<sup>225</sup> Email from Mark Underwood to Jane MacLeod and others dated 5 December 2016 at 18.54 (POL00246340) attaching Steering Group Meeting Discussion Paper: Approach to Fujitsu (POL00246342)

Witness: Rodric David Alun Williams  
Statement Number: WITN08420100  
Exhibits: None  
Date: 11 March 2024

the Horizon system as operating in 2019 might have, given the loss of confidence that could lead to in a business-critical system being used in thousands of branches to process millions of transactions each day. In terms of any concerns about reliability of Horizon as impacting on convictions of PMRs, my comments about the different roles of the High Court and the CCRC at paragraph [205] above apply equally here.

*Remote access in the Horizon Issues trial*

242. As described at paragraph [218] above, the position on remote access changed over time as the Group Litigation unfolded. During the Horizon Issues trial itself the evidence of two Fujitsu witnesses, Stephen Parker and Torstein Godeseth, changed through successive witness statements and in cross-examination, with Mr Justice Fraser himself observing, in paragraphs 545 and 549 of his judgment,<sup>226</sup> that it was only through the trial process and the evidence of Richard Roll that the true position on remote access became known, namely that transaction data can be edited by Fujitsu without the knowledge of PMRs.<sup>227</sup>

Briefing to the Board subcommittee on the Horizon Issues trial

243. The Inquiry has asked me to comment on the minutes of the Board subcommittee from 21 February 2019,<sup>228</sup> at which Anthony de Garr Robinson KC briefed Board members about the upcoming Horizon Issues trial. At this point, the Common Issues trial had been held but we were still awaiting

---

<sup>226</sup> *Bates v Post Office Ltd (No.6: Horizon Issues)* [2019] EWHC 3408 (QB)

<sup>227</sup> At 528 and 549.

<sup>228</sup> Minutes of the meeting of the GLO Subcommittee of POL on 21 February 2019 (POL00006753)

Witness: Rodric David Alun Williams  
Statement Number: WITN08420100  
Exhibits: None  
Date: 11 March 2024

judgment. It was unusual for me to attend the Board subcommittee but I was present and I recall Anthony de Garr Robinson KC going through his speaking note, of which I had been sent a copy in working draft.<sup>229</sup> I have no specific recollection of any questions asked by the subcommittee in response to the briefing. The minutes for the meeting were taken by the assistant company secretary Veronica Branton and appear to reflect it fairly so far as I can recall. I am not sure why the phrase "*critically robust*" was used in the minutes, but recall that the question of whether Horizon was robust or not (and therefore unlikely to have been the cause of losses in the claimants' branches) was the critical issue in the Horizon Issues trial.

244. As the note reflects, POL had set itself a high bar to meet at trial. This inevitably gave rise to concerns about the prospects of success, particularly when meeting that high bar in large part depended on witnesses coming up to proof and Mr Justice Fraser preferring POL's evidence to that of the claimants. I believe Anthony de Garr Robinson KC's advice was that all litigation carries risk and it was possible the court would prefer Jason Coyne's evidence, which had improved through his supplementary report on 1 February 2018. Nevertheless, there was still significant confidence in POL's case. I do not know whether Deloitte reports were provided to the subcommittee, but Deloitte's work is mentioned in the minutes.

245. As far as I recall, POL's main commercial concern going into the Horizon Issues trial was the operational impact of a negative judgment on the Horizon system as it operated in 2019, as described at paragraph [241] above. As I have

---

<sup>229</sup> Document "Privileged Bates & others v Post Office Board Sub-Committee: 21 February 2019 Speaking Note" (POL00028051)

Witness: Rodric David Alun Williams  
Statement Number: WITN08420100  
Exhibits: None  
Date: 11 March 2024

explained, it was not the role of the Common Issues and Horizon Issues trials to determine the safety of convictions. That was a matter for the CCRC and the criminal appeal courts which would consider any cases the CCRC might refer. I continued to provide Group Litigation materials to the CCRC, including the experts' reports and the Horizon Issues Judgment. Following the Horizon Issues Judgment POL also sought advice on its implications for its criminal law obligations from Brian Altman KC and Peters & Peters LLP.

Robert Worden's third report

246. In May 2019, the Horizon Issues trial was ongoing but Robert Worden had not yet been cross-examined. Following the conclusion of POL's factual evidence at the beginning of April 2019, Robert Worden indicated that he had come up with a different way of looking at the issues, and felt it was his duty as an independent expert to volunteer a third report to the court. This was not something that had been requested by either POL or its legal team, and I do not believe any application was made for permission to file the third report. However, Robert Worden felt he needed to provide it to the court directly himself and I do not believe it would have been for POL to dissuade him from acting in line with what he felt to be his duty. Robert Worden did provide his report directly to the court and my understanding is that the claimants' counsel and expert also received it.<sup>230</sup> I do not know if Robert Worden was encouraged to send the report directly to Mr Justice Fraser's clerk, but I do not believe it was done on instructions from POL.<sup>231</sup>

---

<sup>230</sup> Email from Robert Worden to Andy Parsons dated 22 May 2019 at 20.20 (POL00112279)

<sup>231</sup> Minutes of Group Litigation Contingency Planning Governance group meeting dated 13 May 2019 (POL00128821)

Witness: Rodric David Alun Williams  
Statement Number: WITN08420100  
Exhibits: None  
Date: 11 March 2024

#### **PART 10.7: RECUSAL APPLICATION**

247. POL received the draft Common Issues Judgment on 8 March 2019. The judgment came as a shock given the extent to which POL lost the case and the criticisms levelled against it. However, as the draft was delivered the Friday before the Horizon Issues trial started, I was in court for that trial and not part of the team which took the recusal application forward. Although I was aware that the application was being considered by POL senior management, WBD and counsel, I was not party to the discussions held or decisions made on it.

#### **PART 10.8: ENGAGEMENT WITH CCRC DURING GROUP LITIGATION**

248. The Inquiry has asked me to comment on an agenda for a meeting with Fujitsu on 28 February 2017.<sup>232</sup> I recall this meeting was arranged shortly after the Group Litigation Order was made, which required the parties to plead their cases through the spring and summer of 2017. As POL would require significant support from Fujitsu to do this, the meeting was held to ensure that Fujitsu would provide the agile, timely and accurate support POL required, and that it was aware of the consequences if it did not. From the agenda, I can see that the objective was to secure Fujitsu's commitment to supporting all necessary investigations, whether in connection with the Group Litigation or the CCRC.

249. As referred to in paragraph [165], when Fujitsu's input was needed to respond to the CCRC I would generally ask WBD to prepare questions for me to send to Fujitsu, and I would then relay the answers back to the CCRC, usually stating that the responses had come from Fujitsu. I do not think Fujitsu were in direct

---

<sup>232</sup> Agenda for meeting with Fujitsu dated 28 February 2017 (POL00023458)



Witness: Rodric David Alun Williams  
Statement Number: WITN08420100  
Exhibits: None  
Date: 11 March 2024

dialogue with the CCRC, at least until the CCRC asked to view the KEL when I facilitated the visit described at paragraph [227] above.

#### Advice regarding CCRC review

250. The Inquiry has also shown me a briefing note from WBD regarding the CCRC review in April 2017.<sup>233</sup> Unfortunately, with the passage of time, I am unsure of the context in which this was prepared, or the intended audience. Brian Altman KC's advice, mentioned at 5.6 of the briefing note, was disclosed to the CCRC in my email to Miles Trent of 7 February 2018.<sup>234</sup> As I understand it, Brian Altman KC's reason for proposing that it not be disclosed to the CCRC was that it was just his opinion, and the CCRC would reach its own conclusions. As such, it was not given to the CCRC until it was provided following the provision of the Swift Review and subsequent request for related material.

#### Disclosure of PEAKs, KELs and ARQ data

251. As explained at paragraphs [222] to [226] above, the KEL was initially understood to be a live and evolving database which was technically difficult to disclose. POL nevertheless facilitated the CCRC's viewing of the 'live' KEL at Fujitsu's offices. This was offered on 15 November 2017 in my email to Miles Trent, and taken up by the CCRC in January 2018.<sup>235</sup> I understand that the visit took place in March 2018, but I do not believe I attended it.<sup>236</sup> Later Fujitsu found a way to extract the KEL, so that it could be disclosed. ARQ data was

---

<sup>233</sup> Briefing note on CCRC prepared by WBD dated April 2017 (POL00006390)

<sup>234</sup> Email from Rodric Williams to Miles Trent dated 7 February 2018 at 11.14 (POL00126086)

<sup>235</sup> Email from Rodric Williams to Miles Trent dated 15 November 2017 at 17.02 (POL00110826)

<sup>236</sup> Email from Miles Trent to Rodric Williams dated 7 February 2018 at 16.18 (POL00126086)

Witness: Rodric David Alun Williams  
Statement Number: WITN08420100  
Exhibits: None  
Date: 11 March 2024

provided to the CCRC as requested,<sup>237</sup> as were the expert reports produced for the Horizon Issues trial.<sup>238</sup> I cannot now recall what disclosure of PEAKs data occurred, but POL's approach was to provide the CCRC with the materials they required, so whenever they made requests we did what we could to meet them. For example, following a meeting on 28 July 2017 we were able, with assistance from Fujitsu, to put together a detailed response to outstanding questions Grant Thornton had raised for the CCRC about local suspense accounts, transaction corrections and discrepancies, which was attached to my email to the CCRC of 24 September 2017.<sup>239</sup> As noted previously, WBD supported me in preparing correspondence and collating material for the CCRC, and my role was to try to ensure our responses fulfilled the CCRC's request, consider whether anything further could be provided, and conclude with the offer to provide anything further they may require.

252. The Inquiry has asked me to comment on the issues the CCRC raised regarding the Misra transaction logs.<sup>240</sup> My concern was to ensure that the CCRC had the documents and information it required to perform its functions. When the CCRC asked questions about the Misra transaction logs, I believe I will have followed the usual process of asking WBD to track down the information and prepare a draft reply, so I could review this and relay the answer

---

<sup>237</sup> See for example Email of Rodric Williams to Miles Trent dated 11 June 2018 at 18.57 (**POL00042173**)

<sup>238</sup> Email from Rodric Williams to Miles Trent dated 8 January 2019 at 17.47 (**POL00042204**)

<sup>239</sup> See "CCRC Investigation Re Horizon Cases POL Responses to Grant Thornton Questions" dated 17 August 2017 (**POL00250726**), which is attached to Email of Rodric Williams to Miles Trent on 24 September 2017 at 22.27 (**POL00126086**)

<sup>240</sup> Email from Miles Trent to Rodric Williams dated 5 February 2018 at 12.53 (**POL00110826**)

Witness: Rodric David Alun Williams  
Statement Number: WITN08420100  
Exhibits: None  
Date: 11 March 2024

to the CCRC. This appears to have included locating the original files and creating better, more legible, scans of the transaction logs.<sup>241</sup>

## **PART 11: FOLLOWING THE GROUP LITIGATION**

253. Following the settlement of the Group Litigation, POL needed to deliver the commitments it made in the Group Litigation Settlement Deed. Most significantly, this required me to work with Herbert Smith Freehills LLP to establish for POL the Historic/Horizon Shortfall Scheme (HSS). I was also involved in onboarding Peters & Peters LLP to conduct for POL the post-conviction disclosure exercise (PCDE) required following the Horizon Issues Judgment and generally support POL with developments concerning PMR convictions.
254. My recollection is that POL's Board was directly engaged with POL's external lawyers in respect of the HSS, PCDE and other work concerning PMR convictions. My role was to facilitate that engagement by coordinating with POL's external lawyers the materials necessary to enable the Board to give the external lawyers the instructions required to progress matters. This involved working with the external advisers to identify the key decisions that needed to be made, provide the information needed to inform and support the decision-making process, ensure this was delivered in a timely and digestible form, and then take such further action as the Board might require. This also involved substantial engagement with those representing POL's shareholder to secure the funding POL required to offer compensation to affected PMRs (whether through the HSS or following an overturned conviction), and to comply with the

---

<sup>241</sup> Email from Rodric Williams to Andy Parsons dated 15 November 2017 at 17.02 (POL00126086)

Witness: Rodric David Alun Williams  
Statement Number: WITN08420100  
Exhibits: None  
Date: 11 March 2024

conditions upon which funding would be provided. The Board would then make the necessary decisions and give the required instructions to POL's external lawyers. This involved substantial activity and liaison within POL, and with its shareholder and external advisers, which activity was made more challenging due to the onset of the Covid-19 pandemic.

**PART 12: GENERAL**

255. I have always thought of my professional role as being dispute resolution. I regret that the various processes intended to resolve the PMRs' civil law based Horizon complaints have not yet achieved that resolution. I hope that will happen soon. I hope my statement assists the Inquiry in completing its important work. I am happy to assist further if required.

**STATEMENT OF TRUTH**

I believe the contents of this witness statement are true.

**GRO**

Signed

RODRIC DAVID ALUN WILLIAMS

Dated: 11 March 2024

Witness: Rodric David Alun Williams  
Statement Number: WITN08420100  
Exhibits: None  
Date: 11 March 2024

**Index to First Witness Statement of Rodric David Alun Williams**

<b>No.</b>	<b>URN</b>	<b>Document Description</b>	<b>Control Number</b>
1.	POL00041564	Computer Weekly article "Bankruptcy, prosecution and disrupted livelihoods - Postmasters tell their story" dated 11 May 2009	POL-0038046
2.	POL00026572	Report of Rod Ismay "Horizon – Response to Challenges Regarding Systems Integrity" dated 2 August 2010	POL-0021837
3.	POL00030217	Ernst & Young Report "Post Office Limited – Management letter for year ended 27 March 2011" dated 27 March 2011	POL-0026699
4.	POL00060374	Signed 'Raising Concerns with Horizon' ("Raising Concerns") document (undated)	POL-0056853
5.	POL00296484	Email of Rodric Williams to Simon Baker dated 12 May 2013 at 23.56	POL-BSFF-0134534
6.	POL00098294	Email from Kay Linnell to Ron Warmington and others dated 14 May 2013 at 10.41	POL-0097877
7.	POL00040888	Draft Horizon Spot Review SR001 dated 4 October 2012	POL-0037370
8.	POL00107912	Email from Dave Posnett to Rodric Williams dated 13 May 2013 at 19.34	POL-0106135
9.	POL00107919	Email Dave Posnett to Rodric Williams dated 22 May 2013 at 09.59	POL-0106139
10.	POL00098774	Email from Rodric Williams to Paula Vennells dated 27 June 2013 at 15.02	POL-0098357
11.	POL00097917	Email from Simon Baker to Gareth Jenkins and others dated 2 April 2013 at 20.09	POL-0097500
12.	POL00086707	Email from Rodric Williams to Alison Bolsover and others dated 20 May 2013 at 14.32	POL-0083765



Witness: Rodric David Alun Williams  
Statement Number: WITN08420100  
Exhibits: None  
Date: 11 March 2024

13.	<b>POL00107854</b>	Email from Sarah Gomes to Rodric Williams dated 3 January 2013 at 15.58	<b>POL-0106091</b>
14.	<b>POL00114617</b>	Email from Rodric Williams to Michelle Stevens and others dated 17 April 2013 at 18.29	<b>POL-0113718</b>
15.	<b>POL00062368</b>	Email from Jarnail Singh to Hugh Flemington and others dated 1 July 2013 at 16.47	<b>POL-0058847</b>
16.	<b>POL00060590</b>	Email from Andy Parsons to Rodric Williams dated 1 July 2013 at 14.49	<b>POL-0057069</b>
17.	<b>POL00060591</b>	Bond Pearce document 'Horizon is free from defects'	<b>POL-0057070</b>
18.	<b>POL00060592</b>	Bond Pearce Memo 'Misra transcript' dated October 2011	<b>POL-0057071</b>
19.	<b>POL00060593</b>	Bond Pearce document 'POL Training Adequate'	<b>POL-0057072</b>
20.	<b>POL00060594</b>	Bond Pearce document titled 'POL Helpline Adequate'	<b>POL-0057073</b>
21.	<b>POL00144855</b>	Email from Rodric Williams to Lesley Sewell and others dated 27 June 2013 at 18.51	<b>POL-BSFF-0003982</b>
22.	<b>POL00144856</b>	Draft letter to J Mistry 'Re Branch Discrepancies'	<b>POL-BSFF-0003983</b>
23.	<b>POL00144857</b>	Draft letter to D Cheape 'Re Branch Discrepancies at Dundas Post Office'	<b>POL-BSFF-0003984</b>
24.	<b>POL00029622</b>	Email from Rod Ismay to Rodric Williams and others dated 28 June 2013 at 14.01	<b>POL-0026104</b>
25.	<b>POL00029623</b>	Branch Accounting Incidents'	<b>POL-0026105</b>
26.	<b>POL00141543</b>	Draft letter to J Mistry v2 'Re Branch Discrepancies'	<b>POL-0142928</b>
27.	<b>POL00098969</b>	Email from Hugh Flemington to Susan Crichton dated 4 July 2013 at 07.51	<b>POL-0098552</b>
28.	<b>POL00144855</b>	Email from Rodric Williams to Lesley Sewell and others dated 27 June 2013 at 18.51	<b>POL-BSFF-0003982</b>
29.	<b>POL00144856</b>	Draft letter to J Mistry 'Re Branch Discrepancies'	<b>POL-BSFF-0003983</b>

Witness: Rodric David Alun Williams  
Statement Number: WITN08420100  
Exhibits: None  
Date: 11 March 2024

30.	<b>POL00144857</b>	Draft letter to D Cheape 'Re Branch Discrepancies at Dundas Post Office	<b>POL-BSFF-0003984</b>
31.	<b>POL00029622</b>	Email from Rod Ismay to Rodric Williams and others dated 28 June 2013 at 14.01	<b>POL-0026104</b>
32.	<b>POL00029623</b>	Branch Accounting Incidents'	<b>POL-0026105</b>
33.	<b>POL00006540</b>	Email Simon Clarke to Rodric Williams dated 4 July 2013 at 14.14	<b>POL-0017594</b>
34.	<b>POL00145130</b>	Email from Rodric Williams to Martin Smith and others on 3 July 2013 at 19.50	<b>POL-BSFF-0004257</b>
35.	<b>POL00145145</b>	Email of Simon Clarke to Rodric Williams dated 4 July 2013 at 11.03	<b>POL-BSFF-0004272</b>
36.	<b>POL00029648</b>	Email from Susan Crichton to Simon Baker dated 4 July 2013 at 12.49	<b>POL-0026130</b>
37.	<b>POL00145142</b>	Email from Hugh Flemington to Simon Clarke dated 4 July 2013 at 08.01	<b>POL-BSFF-0004269</b>
38.	<b>POL00296729</b>	Email from Hugh Flemington to Rodric Williams dated 27 June 2013 at 18.21	<b>POL-BSFF-0134779</b>
39.	<b>POL00298046</b>	Email from John Scott to Rodric Williams dated 31 July 2013 at 11.37	<b>POL-BSFF-0136096</b>
40.	<b>POL00060580</b>	Email from Simon Baker to Rodric Williams dated 1 July 2013 at 10.31	<b>POL-0057059</b>
41.	<b>POL00099340</b>	Email from Simon Baker to Andrew Winn and others dated 22 July 2013 at 15.33	<b>POL-0098923</b>
42.	<b>POL00190358</b>	Email from Andy Pheasant to Martin Rolfe dated 3 July 2013 at 12.04	<b>POL-BSFF-0028421</b>
43.	<b>POL00022598</b>	Draft report 'Horizon data Lepton SPSO 191320' ("Helen Rose report") dated 12 June 2013	<b>POL-0019077</b>
44.	<b>POL00191994</b>	Email from Rodric Williams to Susan Crichton dated 13 July 2013 at 00.48	<b>POL-BSFF-0030057</b>
45.	<b>POL00188312</b>	Email from Dave Posnett to Rodric Williams dated 14 June 2013 at 09.23	<b>POL-BSFF-0026375</b>

Witness: Rodric David Alun Williams  
Statement Number: WITN08420100  
Exhibits: None  
Date: 11 March 2024

46.	<b>POL00190324</b>	Email from Rodric Williams to Andy Parsons dated 3 July 2013 at 08.53	<b>POL-BSFF-0028387</b>
47.	<b>POL00145108</b>	Email from Andy Parsons to Rodric William dated 3 July 2013 at 10.43	<b>POL-BSFF-0004235</b>
48.	<b>POL00145261</b>	Email from Rodric Williams to Martin Smith and others dated 8 July 2013 at 14.19	<b>POL-BSFF-0004388</b>
49.	<b>POL00115918</b>	Email from Rodric Williams to Lesley Sewell and others dated 2 July 2013 at 14.19	<b>POL-0116920</b>
50.	<b>POL00115919</b>	'Internal Briefing Note to Paula Vennells: Second Sight review into Horizon – Implications of Interim Report' dated 2 July 2013	<b>POL-0116921</b>
51.	<b>POL00115958</b>	Email from Paula Vennells to Alwen Lyons dated 5 July 2013 at 17.33	<b>POL-0116960</b>
52.	<b>POL00115985</b>	Email from Simon Baker to Paula Vennells and others dated 7 July 2013 at 16.30	<b>POL-0116987</b>
53.	<b>POL00099063</b>	Second Sight 'Interim Report into alleged problems with the Horizon system' (" <b>Second Sight Interim Report</b> ")	<b>POL-0098646</b>
54.	<b>POL00099107</b>	Email from Rodric Williams to Paula Vennells and others on 8 July 2013 at 01.42	<b>POL-0098690</b>
55.	<b>POL00040002</b>	Draft update to the Board regarding Horizon Legal Issues dated 22 July 2013	<b>POL-0036484</b>
56.	<b>POL00040001</b>	Email from Susan Crichton to Andy Parsons dated 23 July 2013 at 21.51	<b>POL-0036483</b>
57.	<b>POL00297588</b>	Email from Martin Smith to Rodric Williams dated 10 July 2013 at 14.18	<b>POL-BSFF-0135638</b>
58.	<b>POL00297873</b>	Email from Andy Parsons to Rodric Williams dated 22 July 2013 at 14.02	<b>POL-BSFF-0135923</b>
59.	<b>POL00040935</b>	Post Office Complaint Review and Mediation Scheme (" <b>End of Term Report</b> ")	<b>POL-0037417</b>

Witness: Rodric David Alun Williams  
Statement Number: WITN08420100  
Exhibits: None  
Date: 11 March 2024

60.	<b>POL00139690</b>	Email from John Scott to Susan Crichton dated 14 August 2013 at 07.39	<b>POL-0141391</b>
61.	<b>POL00191968</b>	Email from Rodric Williams to John Scott dated 12 July 2013 at 17.34	<b>POL-BSFF-0030031</b>
62.	<b>POL00083932</b>	Note of Regular Call regarding Horizon issues dated 19 July 2013	<b>POL-0080863</b>
63.	<b>POL00083933</b>	Note of Regular Call regarding Horizon issues dated 24 July 2013	<b>POL-0080864</b>
64.	<b>POL00083934</b>	Note of Regular Call regarding Horizon issues dated 31 July 2013	<b>POL-0080865</b>
65.	<b>POL00062162</b>	Email from Rodric Williams to Martin Smith and others dated 5 July 2013 at 11.22	<b>POL-0058641</b>
66.	<b>POL00133638</b>	Simon Clarke Case Review of <i>R v. Hosi</i> dated 1 May 2014	<b>POL-0138091</b>
67.	<b>POL00006365</b>	Simon Clarke 'General Advice' dated 8 July 2013	<b>POL-0017633</b>
68.	<b>POL00066789</b>	Email from Rodric Williams to Martin Smith and others dated 11 July 2013 at 14.19	<b>POL-0063268</b>
69.	<b>POL00040000</b>	Simon Clarke 'Advice on the use of expert evidence relating to the integrity of the Fujitsu Services Ltd Horizon System dated 15 July 2013	<b>POL-0036482</b>
70.	<b>POL00006800</b>	Simon Clarke 'Compensation for Miscarriages of Justice' dated 19 July 2013	<b>POL-0017592</b>
71.	<b>POL00193605</b>	Email from Rodric Williams to Susan Crichton dated 16 August 2013 at 11.38	<b>POL-BSFF-0031668</b>
72.	<b>POL00039994</b>	Letter from Criminal Cases Review Commission ("CCRC") to Paula Vennells dated 12 July 2013	<b>POL-0036476</b>
73.	<b>POL00039996</b>	Email from Susan Crichton to Andy Parson dated 16 July 2013 at 12.58	<b>POL-0036478</b>
74.	<b>POL00040813</b>	Correspondence bundle between CCRC and POL	<b>POL-0037295</b>



Witness: Rodric David Alun Williams  
Statement Number: WITN08420100  
Exhibits: None  
Date: 11 March 2024

		dated between 15 July 2013 and 5 June 2014	
75.	<b>POL00124350</b>	Letter from Chris Aujard on behalf of POL to CCRC dated 5 June 2014	<b>POL-0127416</b>
76.	<b>POL00021980</b>	Email from Gavin Matthews to Susan Crichton and others dated 9 August 2013 at 15.36	<b>POL-0018459</b>
77.	<b>POL00021981</b>	Brian Altman KC Observations on Terms of Reference dated 2 August 2013	<b>POL-0018460</b>
78.	<b>POL00021982</b>	Draft Terms of Reference for the Appointment of Brian Altman QC	<b>POL-0018461</b>
79.	<b>POL00006583</b>	Brian Altman KC 'Interim Review of Cartwright King's Current Process dated 2 August 2013	<b>POL-0017668</b>
80.	<b>POL00066807</b>	Cartwright King 'Response to the Interim Review of Cartwright King's Current Process by Brian Altman QC' dated 13 August 2013	<b>POL-0063286</b>
81.	<b>POL00006578</b>	Email from Susan Crichton to Rodric Williams dated 16 August 2013 at 09.15	<b>POL-0017603</b>
82.	<b>POL00129452</b>	Cartwright King 'Initial Sift Protocol'	<b>POL-0134936</b>
83.	<b>POL00006799</b>	Simon Clarke 'Disclosure: The Duty to Record and Retain Material' dated 2 August 2013	<b>POL-0017591</b>
84.	<b>POL00006485</b>	Bond Dickinson 'Notes of Conference with Brian Altman KC' dated 9 September 2013	<b>POL-0017790</b>
85.	<b>POL00139866</b>	'Note of Meeting with BAQC' dated 9 September 2013	<b>POL-0141042</b>
86.	<b>POL00006581</b>	Brian Altman KC 'Post Office Ltd: General Review' dated 15 October 2013	<b>POL-0017666</b>
87.	<b>POL00040041</b>	Email from Gavin Matthews to Hugh Flemington and others on 15 October 2013 at 17.45	<b>POL-0036523</b>
88.	<b>POL00108163</b>	Email from Rodric Williams to Martin	<b>POL-0110958</b>



Witness: Rodric David Alun Williams  
Statement Number: WITN08420100  
Exhibits: None  
Date: 11 March 2024

		Edwards dated 24 October 2013 at 10.30	
89.	<b>POL00108161</b>	Email from Martin Edwards to Belinda Crowe dated 28 October 2013 at 15.47	<b>POL-0110956</b>
90.	<b>POL00108162</b>	Chief Executive's Report on Project Sparrow dated 24 October 2013	<b>POL-0110957</b>
91.	<b>POL00108163</b>	Email from Rodric Williams to Martin Edwards dated 24 October 2013 at 10.30	<b>POL-0110958</b>
92.	<b>POL00112937</b>	Brian Altman KC 'Post Office Ltd: Review of Post Office Ltd Prosecution Role' dated 19 December 2013	<b>POL-0110333</b>
93.	<b>POL00038592</b>	Brian Altman KC draft 'Post Office Ltd: Review of Post Office Ltd Prosecution Role' dated 21 October 2013	<b>POL-0027903</b>
94.	<b>POL00043641</b>	Notes of call of Working Group for Initial Complaint Review and Mediation Scheme ("Notes of Working Group call") dated 31 October 2013	<b>POL-0040144</b>
95.	<b>POL00043623</b>	Notes of Working Group call dated 14 November 2013	<b>POL-0040126</b>
96.	<b>POL00043624</b>	Notes of Working Group call dated 28 November 2013	<b>POL-0040127</b>
97.	<b>POL00043625</b>	Notes of Working Group call dated 5 December 2013	<b>POL-0040128</b>
98.	<b>POL00026666</b>	Notes of Working Group call dated 12 December 2013	<b>POL-0023307</b>
99.	<b>POL00074462</b>	Email from Andy Parsons to Chris Aujard and others dated 6 March 2014 at 18.19	<b>POL-0071025</b>
100.	<b>POL00029707</b>	Email from Andy Parsons to Belinda Crowe and others dated 8 April 2014 at 20.42	<b>POL-0026189</b>
101.	<b>FUJ00087119</b>	Email from Pete Newsome to James Davidson and others dated 19 May 2014 at 18.05	<b>POINQ0093290F</b>

Witness: Rodric David Alun Williams  
Statement Number: WITN08420100  
Exhibits: None  
Date: 11 March 2024

102.	<b>POL00108424</b>	Email from Andy Parsons to Belinda Crowe and others dated 14 April 2014 at 14.00	<b>POL-0106524</b>
103.	<b>POL00023432</b>	Email from Andrew Winn to Alan Lusher dated 23 October 2008 at 12.46	<b>POL-0019911</b>
104.	<b>FUJ00087119</b>	Email from Rodric Williams to Andy Parsons dated 22 April 2014 at 12.04	<b>POINQ0093290F</b>
105.	<b>POL00303716</b>	Email from Andy Parsons to Rodric Williams dated 14 April 2014 at 13.22	<b>POL-BSFF-0141766</b>
106.	<b>POL00304478</b>	Email from Andy Parsons to Angela van den Bogerd dated 9 May 2014 at 15.01	<b>POL-BSFF-0142528</b>
107.	<b>POL00212048</b>	Email from Andy Parsons to Belinda Crowe and others dated 10 November 2014 at 16.44	<b>POL-BSFF-0050111</b>
108.	<b>POL00107317</b>	Linklaters 'Report into Initial Complaint Review and Mediation Scheme: Legal Issues' dated 20 March 2014	<b>POL-0105625</b>
109.	<b>POL00022117</b>	Linklaters 'Preliminary note on the future of the Mediation Scheme' dated 31 March 2014	<b>POL-0018596</b>
110.	<b>POL00022109</b>	Presentation 'Initial Complaint and Mediation Scheme: The Way Forward'	<b>POL-0018588</b>
111.	<b>POL00117519</b>	Email from Rodric Williams to Gareth James dated 2 April 2014 at 17.57	<b>POL-0115136</b>
112.	<b>POL00108395</b>	Email from Gareth James to Rodric Williams and others dated 4 April 2014 at 16.20	<b>POL-0106500</b>
113.	<b>POL00125760</b>	Email from Rodric Williams to Gareth James dated 4 April 2014 at 11.17	<b>POL-0130729</b>
114.	<b>POL00117551</b>	Email from Belinda Crowe to Rodric Williams and others dated 4 April 2014 at 08.31	<b>POL-0115168</b>
115.	<b>POL00105635</b>	Deloitte 'Project Zebra – Phase 1 Report (Draft – For validation in advance of Board discussion on Wednesday 30th April)	<b>POL-0104595</b>

Witness: Rodric David Alun Williams  
Statement Number: WITN08420100  
Exhibits: None  
Date: 11 March 2024

116.	<b>POL00108443</b>	Email from Rodric Williams to Mark Westbrook dated 22 April 2014 at 10.35	<b>POL-0106541</b>
117.	<b>POL00108453</b>	Email from Rodric Williams to Mark Westbrook dated 23 April 2014 at 14.32	<b>POL-0106551</b>
118.	<b>POL00029728</b>	Email from Mark Westbrook to Rodric Williams dated 20 May 2014 at 12.44	<b>POL-0026210</b>
119.	<b>POL00031384</b>	Deloitte 'HNG-X: Review of Assurance Sources – Discussion Areas re: Phase 2 (Draft - For Discussion only)'	<b>POL-0028286</b>
120.	<b>POL00031391</b>	Deloitte 'HNG-X: Review of Assurance Sources – Phase 1 – Board Update at 13/5/14'	<b>POL-0028293</b>
121.	<b>POL00029726</b>	Deloitte 'HNG-X: Review of Assurance Sources - Board Update - As at 16/05/2014 (Draft)'	<b>POL-0026208</b>
122.	<b>POL00304303</b>	Email from Rodric Williams to Larissa Wilson dated 7 May 2014 at 14.37	<b>POL-BSFF-0142353</b>
123.	<b>POL00138314</b>	Email from Rodric Williams to Lesley Sewell and others dated 9 May 2014 at 14.12	<b>POL-BSFF-0000539</b>
124.	<b>POL00117612</b>	Deloitte 'Change Order Number 1, v 2' dated 6 May 2014	<b>POL-0115229</b>
125.	<b>POL00028062</b>	Deloitte 'Horizon: Desktop Review of Assurance Sources and Key Control Features - Draft for Discussion' dated 23 May 2014 (the "May 2014 Deloitte Report")	<b>POL-0023065</b>
126.	<b>POL00204927</b>	Email Rodric Williams to Gareth James and others dated 29 May 2014 at 10:15	<b>POL-BSFF-0042990</b>
127.	<b>POL00031400</b>	Email from Chris Aujard to Paula Vennells and others dated 29 May 2014 at 18.35	<b>POL-0028302</b>
128.	<b>POL00031401</b>	Email from Gareth James to Chris Aujard dated 29 May 2014 at 19.28	<b>POL-0028303</b>

Witness: Rodric David Alun Williams  
 Statement Number: WITN08420100  
 Exhibits: None  
 Date: 11 March 2024

129.	<b>POL00028069</b>	Deloitte 'Board Briefing: Document, further to our report "Horizon: Desktop review of assurance sources and key control features" dated 4 June 2014	<b>POL-0023072</b>
130.	<b>POL00006552</b>	Email from Andy Parsons to David Oliver and others dated 31 March 2014 at 20.53	<b>POL-0017646</b>
131.	<b>POL00006553</b>	Marked-up version of Second Sight 'Draft - Thematic Issues Report'	<b>POL-0017647</b>
132.	<b>POL00006554</b>	Email from Andy Parsons to David Oliver and others dated 29 April 2014 at 15.09	<b>POL-0017648</b>
133.	<b>POL00004439</b>	Second Sight 'Briefing Report- Part One' dated 25 July 2014	<b>VIS00005507</b>
134.	<b>POL00006555</b>	Marked-up version of Second Sight 'Branch Operating Procedures' dated 29 April 2014	<b>POL-0017649</b>
135.	<b>POL00040153</b>	Email from David Oliver to Chris Aujard and others dated 1 May 2014 at 06.52	<b>POL-0036635</b>
136.	<b>POL00040154</b>	'Post Office Briefing Note: Working Group' dated 1 May 2014	<b>POL-0036636</b>
137.	<b>POL00006485</b>	Bond Dickinson 'Notes of Conference with Brian Altman KC' dated 9 September 2013	<b>POL-0017790</b>
138.	<b>POL00061549</b>	Email from Rodric Williams to Chris Aujard dated 16 July 2014 at 21.44	<b>POL-0058028</b>
139.	<b>POL00006368</b>	Brian Altman KC 'Post Office Ltd: Advice on Suggested Approach to Criminal Case Mediation' dated 5 September 2014	<b>POL-0017636</b>
140.	<b>POL00148709</b>	Email from David Oliver to Andy Parsons and others dated 15 July 2014 at 10.11	<b>POL-BSFF-0007830</b>
141.	<b>POL00022150</b>	Second Sight 'Initial Complaint Review and Mediation Scheme - Mediation Briefing Report: Part Two (Draft v 2) dated 30 July 2014	<b>POL-0018629</b>



Witness: Rodric David Alun Williams  
Statement Number: WITN08420100  
Exhibits: None  
Date: 11 March 2024

142.	<b>POL00022145</b>	Email Rodric Williams to Jonathan Swil dated 1 August 2014 at 16.16	<b>POL-0018624</b>
143.	<b>POL00040209</b>	WBD draft letter to Second Sight 'Post Office Response to Draft Part 2 Report'	<b>POL-0036691</b>
144.	<b>POL00022216</b>	Letter from Rodric Williams to Second Sight 'Second Sight's Draft Part Two Mediation Briefing Report' dated 14 August 2014	<b>POL-0018695</b>
145.	<b>POL00207439</b>	Email from Belinda Crowe to Ron Warmington and others dated 14 August 2014 at 17.40	<b>POL-BSFF-0045502</b>
146.	<b>POL00021810</b>	Email from Rodric Williams to Michael Harvey dated 15 September 2014 at 15.39	<b>POL-0018289</b>
147.	<b>FUJ00087174</b>	Fujitsu document 'Fujitsu's comments on Second Sight Briefing Report – Part Two' dated 15 September 2014	<b>POINQ0093345F</b>
148.	<b>POL00021762</b>	Email from Belinda Crowe to Charles Colquhoun and others dated 6 August 2014 at 17.16	<b>POL-0018241</b>
149.	<b>POL00022297</b>	Email from Andy Parsons to Chris Aujard and others dated 27 January 2015 at 13.19	<b>POL-0018776</b>
150.	<b>POL00040935</b>	Post Office Complaint Review and Mediation Scheme ("End of Term Report")	<b>POL-0037417</b>
151.	<b>POL00040927</b>	Email of Rodric Williams to Tom Wechsler and others dated 6 March 2015 at 15.32	<b>POL-0037409</b>
152.	<b>POL00102062</b>	Email from Melanie Corfield to Mark Davies and others dated 23 January 2015 at 21.56	<b>POL-0101645</b>
153.	<b>POL00116814</b>	Email from Patrick Bourke to Chris Aujard and others dated 24 November 2014 at 18.49	<b>POL-0114611</b>
154.	<b>POL00022352</b>	Email from Patrick Bourke to Andy Parsons dated 5 February 2015 at 14.01	<b>POL-0018831</b>



Witness: Rodric David Alun Williams  
Statement Number: WITN08420100  
Exhibits: None  
Date: 11 March 2024

155.	<b>POL00006364</b>	WBD document 'Termination of Second Sight' dated 6 February 2015	<b>POL-0017632</b>
156.	<b>POL00040925</b>	Email from Andy Parsons to Rodric Williams dated 5 March 2015 at 18.03	<b>POL-0037407</b>
157.	<b>POL00000216</b>	Letter from Jane MacLeod on behalf of POL to Second Sight 'Notice to cease providing services' dated 10 March 2015	<b>VIS00001190</b>
158.	<b>POL00022456</b>	Letter from Jane MacLeod on behalf of POL to Sir Anthony Hooper 'Initial Complaint Review and Mediation Scheme' dated 10 March 2015	<b>POL-0018935</b>
159.	<b>POL00000219</b>	Work Plan' dated 10 March 2015	<b>VIS00001193</b>
160.	<b>POL00044389</b>	POL Investigation, Legal report regarding Josephine Hamilton dated 17 May 2006	<b>POL-0040868</b>
161.	<b>POL00025188</b>	Letter from Rodric Williams on behalf of POL to Second Sight 'MO35 – Josephine Hamilton' dated 2 June 2015	<b>POL-0021667</b>
162.	<b>POL00065542</b>	Email from Second Sight to Rodric Williams dated 3 June 2015 at 14.15	<b>POL-0062021</b>
163.	<b>FUJ00087119</b>	Email from James Davidson to Rodric Williams dated 17 April 2014 at 16.27	<b>POINQ0093290F</b>
164.	<b>POL00091397</b>	Email from Belinda Crowe to Patrick Bourke and others dated 23 October 2014 at 07.29	<b>POL-0090419</b>
165.	<b>POL00307607</b>	Email from Belinda Crowe to Angela van den Bogerd and others dated 21 October 2014 at 16.34	<b>POL-BSFF-0145657</b>
166.	<b>POL00091397</b>	Email from Belinda Crowe to Patrick Bourke and others dated 23 October 2014 at 07.29	<b>POL-0090419</b>
167.	<b>POL00062162</b>	Email from Rodric Williams to Belinda Crowe dated 31 October 2014 at 13.45	<b>POL-0058641</b>
168.	<b>POL00149466</b>	Email from Mark Westbrook to Rodric	<b>POL-BSFF-0008586</b>

Witness: Rodric David Alun Williams  
Statement Number: WITN08420100  
Exhibits: None  
Date: 11 March 2024

		Williams and others dated 10 November 2014 at 14.02	
169.	<b>POL00212048</b>	Email Andy Parsons to Belinda Crowe and others dated 10 November 2014 at 16.44	<b>POL-BSFF-0050111</b>
170.	<b>POL00308936</b>	Email from Andy Parsons to Rodric Williams on 17 December 2014 at 15.35	<b>POL-BSFF-0146986</b>
171.	<b>POL00149675</b>	Email from Patrick Bourke to Andy Parsons and others dated 26 November 2014 at 13.29	<b>POL-BSFF-0008793</b>
172.	<b>POL00222757</b>	Email from Mark Westbrook to Rodric Williams and others dated 26 February 2015 at 12.24	<b>POL-BSFF-0060820</b>
173.	<b>POL00021799</b>	WBD document 'Advice on Balancing Transactions'	<b>POL-0018278</b>
174.	<b>POL00029836</b>	Email from Patrick Bourke to Ian Henderson and others dated 9 April 2015 at 10.27	<b>POL-0026318</b>
175.	<b>POL00021846</b>	Extract from Second Sight '14. Transactions not entered by the Subpostmaster or their staff'	<b>POL-0018325</b>
176.	<b>POL00065929</b>	Email from Rodric Williams to Mark Underwood dated 13 January 2016 at 10.57	<b>POL-0062408</b>
177.	<b>POL00113136</b>	Simon Clarke 'Proposed Memorandum of Understanding POL and Fujitsu' dated 4 February 2014	<b>POL-0110520</b>
178.	<b>POL00113135</b>	Simon Clarke 'Securing Data for Future Prosecutions' dated 2 July 2014	<b>POL-0110519</b>
179.	<b>POL00042858</b>	Post Office submissions in relation to the Fujitsu contract dated 31 July 2019	<b>POL-0039340</b>
180.	<b>POL00150845</b>	Email from Rodric Williams to Martin Smith dated 21 January 2015 at 16.46	<b>POL-BSFF-0009957</b>
181.	<b>POL00311931</b>	Email from Rodric Williams to Martin Smith	<b>POL-BSFF-0149981</b>

Witness: Rodric David Alun Williams  
Statement Number: WITN08420100  
Exhibits: None  
Date: 11 March 2024

		and others dated 9 February 2015 at 14.20	
182.	<b>POL00312540</b>	Email from Rodric Williams to Georgia Baker dated 27 February 2015 at 11.42	<b>POL-BSFF-0150590</b>
183.	<b>POL00223161</b>	Letter from Jane MacLeod to CCRC dated 27 February 2015	<b>POL-BSFF-0061224</b>
184.	<b>POL00151297</b>	Email from Gavin Matthews to Rodric Williams dated 26 February 2015 at 15.20	<b>POL-BSFF-0010409</b>
185.	<b>POL00223160</b>	Email from Georgia Barker to Rodric Williams dated 3 March 2015 at 10.02	<b>POL-BSFF-0061223</b>
186.	<b>POL00029843</b>	Simon Clarke 'Note: Deloitte Report - Questions for POL' dated 27 March 2015	<b>POL-0026325</b>
187.	<b>POL00110243</b>	Draft speaking note for Post Office meeting with CCRC dated 8 May 2015	<b>POL-0108064</b>
188.	<b>POL00125758</b>	Speaking note for Post Office meeting with CCRC dated 8 May 2015	<b>POL-0131600</b>
189.	<b>POL00314595</b>	Email from Rodric Williams to Gregg Cooke and others dated 15 April 2015 at 17.47	<b>POL-BSFF-0152645</b>
190.	<b>POL00065670</b>	Speaking note for Post Office meeting with CCRC dated 6 November 2015	<b>POL-0062149</b>
191.	<b>POL00065671</b>	Annotated Speaking note for Post Office meeting with CCRC dated 6 November 2015	<b>POL-0062150</b>
192.	<b>POL00242986</b>	Email from Rodric Williams to Amanda Pearce dated 13 January 2016 at 15.12	<b>POL-BSFF-0081049</b>
193.	<b>POL00103156</b>	Email from Rodric Williams to Amanda Pearce dated 14 March 2016 at 16.45	<b>POL-0102739</b>
194.	<b>POL00103238</b>	Email from Gavin Matthews to Rodric Williams dated 2 August 2016 at 13.48	<b>POL-0102821</b>
195.	<b>POL00103263</b>	Email from Rodric Williams to Amanda Pearce dated 13 November 2016	<b>POL-0102846</b>

Witness: Rodric David Alun Williams  
Statement Number: WITN08420100  
Exhibits: None  
Date: 11 March 2024

196.	<b>POL00103278</b>	Email from Rodric Williams to Amanda Pearce dated 21 December 2016 at 18.44	<b>POL-0102861</b>
197.	<b>POL00137142</b>	Email from Rodric Williams to Gavin Matthews and others dated 25 April 2016 at 11.40	<b>POL-0125518</b>
198.	<b>POL00065602</b>	Email from Mark Underwood to Patrick Bourke dated 18 September 2015 at 13.24	<b>POL-0062081</b>
199.	<b>POL00101659</b>	Email from Belinda Crowe to Mark Davies and others dated 5 December 2014 at 18.42	<b>POL-0101242</b>
200.	<b>POL00101660</b>	Letter from Rodric Williams to Nick Wallis dated 5 December 2014	<b>POL-0101243</b>
201.	<b>POL00101665</b>	Email from Mark Davies to Belinda Crowe and others dated 7 December 2014 at 22.52	<b>POL-0101248</b>
202.	<b>POL00101668</b>	Email from Patrick Bourke to Mark Davies and others dated 8 December 2014	<b>POL-0101251</b>
203.	<b>POL00101670</b>	Email from Tom Weschler to Melanie Corfield and others dated 8 December 2014 at 09.51	<b>POL-0101253</b>
204.	<b>POL00101671</b>	Email from Rodric Williams to Belinda Crowe and others dated 8 December 2014 at 10.16	<b>POL-0101254</b>
205.	<b>POL00101715</b>	Letter from CMS to BCC Programme Legal Advice dated 9 December 2014	<b>POL-0101298</b>
206.	<b>POL00101741</b>	Email from Rodric Williams dated 9 December 2014 at 10.45	<b>POL-0101324</b>
207.	<b>POL00101745</b>	Email from Rodric Williams to Mark Davies dated 9 December 2014 at 12.28	<b>POL-0101328</b>
208.	<b>POL00101858</b>	Email from Angela van den Bogerd to Rodric Williams and others dated 14 December 2014 at 12.34	<b>POL-0101441</b>
209.	<b>POL00101915</b>	Letter from CMS to BBC Programme Legal Advice dated 16 December 2014	<b>POL-0101498</b>



Witness: Rodric David Alun Williams  
Statement Number: WITN08420100  
Exhibits: None  
Date: 11 March 2024

210.	<b>POL00101899</b>	Email from Rodric Williams to Mark Davies and others dated 16 December 2014 at 14.16	<b>POL-0101482</b>
211.	<b>POL00101902</b>	Email from Melanie Corfield to Tom Wechsler dated 16 December 2014 at 14.27	<b>POL-0101485</b>
212.	<b>POL00101906</b>	Email from Melanie Corfield to Mark Davies and others dated 16 December 2014 at 14.39	<b>POL-0101489</b>
213.	<b>POL00101980</b>	Draft letter from CMS to BBC Programme Legal Advice dated January 2015	<b>POL-0101563</b>
214.	<b>POL00101968</b>	Email from Belinda Crowe to Rodric Williams and others dated 8 January 2015 at 18.10	<b>POL-0101551</b>
215.	<b>POL00105883</b>	Email from Susan Barty to Ruth Barker and others dated 19 January 2015 at 10.41	<b>POL-0104729</b>
216.	<b>POL00117416</b>	Email from Rodric Williams to Melanie Corfield and others dated 16 June 2015 at 09.51	<b>POL-0114648</b>
217.	<b>POL00065410</b>	Email from Mark Davies to Rodric Williams dated 22 June 2015 at 17.41	<b>POL-0061889</b>
218.	<b>POL00065416</b>	Email from Mark Davies to Rodric Williams dated 23 June 2015 at 10.51	<b>POL-0061895</b>
219.	<b>POL00065419</b>	Email from Tom Reid to Rodric Williams and others dated 23 June 2015 at 11.22	<b>POL-0061898</b>
220.	<b>POL00065429</b>	Email from Patrick Bourke to Rodric Williams dated 26 June 2015 at 10.22	<b>POL-0061908</b>
221.	<b>POL00065499</b>	Email from Tom Reid to Rodric Williams dated 5 August 2015 at 15.04	<b>POL-0061978</b>
222.	<b>POL00065519</b>	Letter from CMS to BBC Programme Legal Advice dated 10 August 2015	<b>POL-0061998</b>
223.	<b>POL00105862</b>	Email from Susan Barty to Mark Davies and others dated 15 September 2015 at 15.04	<b>POL-0104708</b>



Witness: Rodric David Alun Williams  
Statement Number: WITN08420100  
Exhibits: None  
Date: 11 March 2024

224.	<b>POL00105866</b>	Email from Tom Reid to Rodric Williams dated 11 January 2016 at 18.16	<b>POL-0104712</b>
225.	<b>POL00106920</b>	Email from Rodric Williams to Mark Davies and others dated 3 March 2016 at 13.23	<b>POL-0105228</b>
226.	<b>POL00152834</b>	Email from Rodric Williams to Tom Reid dated 10 August 2015 at 16.13	<b>POL-BSFF-0011946</b>
227.	<b>POL00152835</b>	POL 'Statement for Panorama' dated 4 August 2015	<b>POL-BSFF-0011947</b>
228.	<b>POL00131623</b>	Email from Michael Harvey to Rodric Williams dated 21 December 2015 at 14.14	<b>POL-0121440</b>
229.	<b>POL00006355</b>	'A Review on Behalf of the Chairman of Post Office Limited' Swift Review	<b>POL-0017623</b>
230.	<b>POL00102517</b>	Email from Mark Underwood to Rodric Williams and others dated 25 August 2015 at 13.23	<b>POL-0102100</b>
231.	<b>POL00102551</b>	Letter from Baroness Neville-Rolfe to Tim Parker dated 10 September 2015.	<b>POL-0102134</b>
232.	<b>POL00114270</b>	Instructions to Sir Jonathan Swift dated 6 October 2015	
233.	<b>POL00233682</b>	Email from Sir Jonathan Swift to Jane MacLeod and Rodric Williams dated 9 October 2015 at 07.50	<b>POL-BSFF-0071745</b>
234.	<b>POL00102617</b>	Email from Jane MacLeod to Sir Jonathan Swift dated 22 October 2015 at 17.03	<b>POL-0102200</b>
235.	<b>POL00103106</b>	The Swift Review Action Grid	<b>POL-0102689</b>
236.	<b>POL00022747</b>	Email from Sir Jonathan Swift to Rodric Williams dated 26 July 2016 at 15.06	<b>POL-0019226</b>
237.	<b>POL00110434</b>	Email from Rodric Williams to Tom Wechsler and others dated 23 May 2016 at 17.57	<b>POL-0111333</b>
238.	<b>POL00163037</b>	Email from Rodric Williams to Thomas Moran and others dated 20 June 2016 at 18.08	<b>POL-0151383</b>

Witness: Rodric David Alun Williams  
Statement Number: WITN08420100  
Exhibits: None  
Date: 11 March 2024

239.	<b>POL00041136</b>	Email from Rodric Williams to Mark Underwood dated 21 April 2016 at 12.51	<b>POL-0037618</b>
240.	<b>POL00255859</b>	Email from Rodric Williams to Alwen Lyons and others dated 20 April 2016 at 21.53	<b>POL-BSFF-0093922</b>
241.	<b>POL00041242</b>	Email from Rodric Williams to Gavin Matthews dated 17 June 2016 at 11.12	<b>POL-0037724</b>
242.	<b>POL00006601</b>	Letter from WBD to POL 'Bates & others v Post Office Limited' dated 21 June 2016	<b>POL-0017859</b>
243.	<b>POL00006600</b>	Email from Rodric Williams to Jonathan Swift dated 26 July 2016 at 10.35	<b>POL-0017858</b>
244.	<b>POL00022747</b>	Email from Jonathan Swift to Rodric Williams dated 26 July 2016 at 14.06	<b>POL-0019226</b>
245.	<b>POL00112884</b>	Brian Altman KC advice 'Review of Post Office Limited Criminal Prosecutions' dated 26 July 2016	<b>POL-0111598</b>
246.	<b>POL00022754</b>	Email from Andy Parsons to Rodric Williams and others dated 26 July 2016 at 12.55	<b>POL-0019233</b>
247.	<b>POL00006380</b>	WBD Decision Papers for Steering Group meeting dated 11 September 2017	<b>POL-0017685</b>
248.	<b>POL00006379</b>	WBD Paper for Steering Group meeting 'Litigation Strategy Options' dated 11 September 2017	<b>POL-0017684</b>
249.	<b>POL00041260</b>	Final version of draft Letter of Response	<b>POL-0037742</b>
250.	<b>POL00041510</b>	Letter from Freeths to WBD 'Fourth Witness Statement of Mr Parsons' dated 16 October 2017	<b>POL-0037992</b>
251.	<b>POL00041509</b>	Email from Andy Parsons to Rodric Williams dated 16 October 2017 at 09.46	<b>POL-0037991</b>
252.	<b>POL00000444</b>	Fourth Witness Statement of Andy Parsons dated 9 October 2017	<b>VIS00001458</b>
253.	<b>POL00041527</b>	Email from Rodric Williams to Jane MacLeod	<b>POL-0038009</b>

Witness: Rodric David Alun Williams  
Statement Number: WITN08420100  
Exhibits: None  
Date: 11 March 2024

		and others dated 9 November 2017 at 09:47	
254.	<b>POL00258011</b>	Email from Rodric Williams to Andy Parsons and other dated 16 October 2018 at 02.04	<b>POL-BSFF-0096074</b>
255.	<b>POL00041770</b>	Email from Patrick Bourke to Rodric Williams dated 11 May 2018 at 12.02	<b>POL-0038252</b>
256.	<b>BEIS0000079</b>	UKGI / Post Office Limited Information Sharing Protocol dated 11 June 2018	<b>BEIS0000059</b>
257.	<b>POL00024988</b>	Email from Andy Parsons to Rodric Williams and others dated 13 July 2016 at 11.02	<b>POL-0021467</b>
258.	<b>POL00024989</b>	Decision Papers for Postmaster Group Action	<b>POL-0021468</b>
259.	<b>POL00029998</b>	Email from Andy Parsons to Mark Davies and others dated 21 July 2016 at 17.56	<b>POL-0026480</b>
260.	<b>POL00030002</b>	Email from Mark Davies to Jane MacLeod dated 22 July 2016 at 10.49	<b>POL-0026484</b>
261.	<b>POL00041258</b>	Email from Jane MacLeod to Paula Vennells dated 25 July 2016 at 06.27	<b>POL-0037740</b>
262.	<b>POL00110482</b>	Email from Jane MacLeod to Andy Parsons dated 26 July 2016 at 20.37	<b>POL-0108217</b>
263.	<b>POL00022659</b>	Email from Amy Prime to Mark Underwood and others dated 27 July 2016 at 13.44	<b>POL-0019138</b>
264.	<b>POL00041259</b>	Email from Andy Parsons to Jane MacLeod and others dated 27 July 2016 at 19.50	<b>POL-0037741</b>
265.	<b>POL00029990</b>	Email from Andy Parsons to Jane MacLeod and others dated 13 July 2016 at 15.40	<b>POL-0026472</b>
266.	<b>POL00243250</b>	Email from Andy Parsons to Thomas Moran and others dated 16 July 2016 at 14.09	<b>POL-BSFF-0081313</b>
267.	<b>POL00003340</b>	Letter from WBD to Freeths dated 18 July 2017 enclosing POL's Generic Defence and Counterclaim	<b>VIS00004354</b>

Witness: Rodric David Alun Williams  
Statement Number: WITN08420100  
Exhibits: None  
Date: 11 March 2024

268.	<b>POL00249676</b>	Email from Rodric Williams to Andy Parsons dated 8 July 2017 at 06.54	<b>POL-BSFF-0087739</b>
269.	<b>FUJ00085337</b>	Email from Andy Parsons to Fujitsu Legal Defence (Chris Jay) dated 4 July 2017 at 21.38	<b>POINQ0091508F</b>
270.	<b>POL00249611</b>	Horizon sections of Draft Generic Defence	<b>POL-BSFF-0087674</b>
271.	<b>POL00249612</b>	Email from Andy Parsons to Mark Westbrook dated 4 July 2017 at 21.40	<b>POL-BSFF-0087675</b>
272.	<b>POL00249635</b>	Email from Chris Jay to Andy Parsons dated 5 July 2017 at 14.50	<b>POL-BSFF-0087698</b>
273.	<b>POL00038852</b>	Email from Amy Prime to Rodric Williams dated 5 October 2016 at 11.01	<b>POL-0027587</b>
274.	<b>POL00277546</b>	Closing submissions on behalf of Post Office Ltd to the Horizon Issues trial	<b>POL-BSFF-0115609</b>
275.	<b>POL00041479</b>	For example, Email of Andy Parsons to Pete Newsome dated 19 September 2017 at 09.56	<b>POL-0037961</b>
276.	<b>POL00003414</b>	Freeths' letter to Andy Parsons dated 13 September 2017	<b>VIS00004428</b>
277.	<b>POL00041479</b>	Email from Andy Parsons to Pete Newsome and others dated 19 September 2017 at 09.56	<b>POL-0037961</b>
278.	<b>POL00041480</b>	Email from Andy Parsons to Pete Newsome and others dated 20 September 2017 at 17.31	<b>POL-0037962</b>
279.	<b>POL00041481</b>	Draft letter from WBD to Freeths dated 20 September 2017 regarding preservation of Horizon data	<b>POL-0037963</b>
280.	<b>POL00041482</b>	Draft letter from WBD to Freeths regarding KEL	<b>POL-0037964</b>
281.	<b>POL00003480</b>	Letter from WBD to Freeths dated 22 September 2017 regarding KEL	<b>VIS00004494</b>
282.	<b>POL00006431</b>	Noting paper: Update on Litigation Strategy for meeting on 16 October 2017	<b>POL-0017736</b>
283.	<b>POL00025358</b>	Email from Kerry Moodie to Mark Underwood and	<b>POL-0021837</b>



Witness: Rodric David Alun Williams  
Statement Number: WITN08420100  
Exhibits: None  
Date: 11 March 2024

		others dated 9 January 2017 at 17.31	
284.	<b>POL00041458</b>	Email from Paul Loraine to Rodric Williams dated 14 August 2017 at 12.36 and Email from Rodric Williams to Miles Trent dated 26 July 2017 at 16.31	<b>POL-0037940</b>
285.	<b>POL00003386</b>	Letter from Freeths to WBD dated 2 October 2018 regarding PEAK disclosure	<b>VIS00004400</b>
286.	<b>POL00003363</b>	Letter from WBD to Freeths dated 28 November 2018 regarding expert reports	<b>VIS00004377</b>
287.	<b>POL00002356</b>	Zebra Action Summary (redacted)	<b>VIS00003370</b>
288.	<b>POL00027054</b>	Zebra Action Summary (unredacted)	<b>POL-0023695</b>
289.	<b>POL00255949</b>	Email from Amy Prime to Rodric Williams dated 26 July 2018 at 19.14	<b>POL-BSFF-0094012</b>
290.	<b>POL00041955</b>	Email from Angela van den Bogerd to Andy Parsons and others dated 20 August 2018 at 22.55	<b>POL-0038437</b>
291.	<b>POL00041956</b>	Draft witness statement of Angela van den Bogerd	<b>POL-0038438</b>
292.	<b>POL00041986</b>	Email from Rodric Williams to Andy Parsons dated 23 August 2018 at 23.26	<b>POL-0038468</b>
293.		<i>Bates v Post Office (No 3)</i> [2019] EWHC 606 (QB)	
294.	<b>POL00006471</b>	Briefing note on the report of Dr Worden for Steering Group meeting on 28 November 2018	<b>POL-0017776</b>
295.	<b>POL00042015</b>	Email from Rodric Williams to Simon Clarke and others dated 7 September 2018 at 13.12	<b>POL-0038497</b>
296.	<b>POL00246340</b>	Email from Mark Underwood to Jane MacLeod and others dated 5 December 2016 at 18.54	<b>POL-BSFF-0084403</b>
297.	<b>POL00246342</b>	Steering Group Meeting Discussion Paper: Approach to Fujitsu	<b>POL-BSFF-0084405</b>



Witness: Rodric David Alun Williams  
Statement Number: WITN08420100  
Exhibits: None  
Date: 11 March 2024

298.	<b>POL00006753</b>	Minutes of the meeting of the GLO Subcommittee of POL on 21 February 2019	<b>POL-0018011</b>
299.	<b>POL00028051</b>	Document "Privileged Bates & others v Post Office Board Sub-Committee: 21 February 2019 Speaking Note"	<b>POL-0023054</b>
300.	<b>POL00112279</b>	Email from Robert Worden to Andy Parsons dated 22 May 2019 at 20.20	<b>POL-0109811</b>
301.	<b>POL00128821</b>	Minutes of Group Litigation Contingency Planning Governance group meeting dated 13 May 2019	<b>POL-0132176</b>
302.	<b>POL00023458</b>	Agenda for meeting with Fujitsu dated 28 February 2017	<b>POL-0019937</b>
303.	<b>POL00006390</b>	Briefing note on CCRC prepared by WBD dated April 2017	<b>POL-0017695</b>
304.	<b>POL00126086</b>	Email from Rodric Williams to Miles Trent dated 7 February 2018 at 11.14	<b>POL-0131493</b>
305.	<b>POL00110826</b>	Email from Rodric Williams to Miles Trent dated 15 November 2017 at 17.02	<b>POL-0108468</b>
306.	<b>POL00126086</b>	Email from Miles Trent to Rodric Williams dated 7 February 2018 at 16.18	<b>POL-0131493</b>
307.	<b>POL00042173</b>	Email from Rodric Williams to Miles Trent dated 11 June 2018 at 18.57	<b>POL-0038655</b>
308.	<b>POL00042204</b>	Email from Rodric Williams to Miles Trent dated 8 January 2019 at 17.47	<b>POL-0038686</b>
309.	<b>POL00250726</b>	CCRC Investigation Re Horizon Cases POL Responses to Grant Thornton Questions" dated 17 August 2017	<b>POL-BSFF-0088789</b>
310.	<b>POL00126086</b>	Email of Rodric Williams to Miles Trent on 24 September 2017 at 23.27 and Email from Rodric Williams to Andy Parsons dated 15 November 2017 at 17.02	<b>POL-0131493</b>