

Witness Name: Angela Van Den Bogerd

Statement No: WITN09900100

Dated: 20 March 2024

POST OFFICE HORIZON IT INQUIRY

FIRST WITNESS STATEMENT OF ANGELA VAN DEN BOGERD

I, Angela Van Den Bogerd, will say as follows:

1. I make this statement in response to a Request for Information pursuant to Rule 9 of the Inquiry Rules 2006, regarding matters within Phases 5 and 6 of the Post Office Horizon IT Inquiry, dated 29 January 2024.
2. As laid out below, I was closely involved with the Sub-Postmasters (“SPM”) claims, including acting as a witness in the Common Issues Trial and Horizon Issues Trial. I have followed the Inquiry and what has come out of it has horrified me. Had I known that the Horizon IT system was flawed on implementation, my approach would have been different throughout my time with Post Office Limited (“POL”). I am in complete support of full compensation for all SPM’s who were affected by Horizon IT issues and

regret that it has not been paid out quicker and to an appropriate value which meets their claims.

3. I have set out to answer the Inquiry's questions to the best of my ability but I have at times been limited in my ability to do so due to issues with disclosure. Where I have knowledge that documents are in existence but have not been disclosed, I have requested these both direct from POL and the Inquiry and unfortunately some have been disclosed at the last minute or not at all. My intention is to assist the Inquiry in a full and frank way which provides them with meaningful answers, but I have felt impeded in my ability to do so and so I feel it necessary to highlight these difficulties that I have experienced. In addition to the Rule 9 documents disclosed by the Inquiry, I requested and received over 300 additional documents, numbering over 4,500 pages.
4. During my time with POL I have always acted to the best of my ability and with the knowledge I had at the time, I was always reassured that Horizon was robust and that underlined the basis of my actions. I regret that it took so long for the true position on Horizon integrity and remote access to be acknowledged and the impact that this has had.
5. To those that were wrongly prosecuted, whilst I wasn't personally involved in those prosecutions, I am truly sorry for the devastating impact that has had on them and their family and friends.
6. I have heard the term 'corporate amnesia' being referenced about some evidence already given to the Inquiry. I want to say from the outset that my

intention is to fully cooperate with the Inquiry and help Sir Wyn Williams in his investigation. I will not try to hide anything and say that I cannot remember something when I can. In putting together this witness statement I have reviewed everything disclosed to me by the Inquiry and, as noted above, I also requested and reviewed over 300 additional documents to help me provide as full an answer as possible. If I am unable to recall a detail, I will do my best to direct the Inquiry to where they can obtain that information. I hope that my witness statement goes some way to assisting the SPM's with obtaining the truth.

7. I can confirm that I have had the legal assistance of Ashfords LLP in drafting this statement.

BACKGROUND

8. I left school in 1984 with 11 O Levels and 2 A Levels. Whilst studying for my A Levels, I worked part-time as a retail assistant and as a lifeguard. I joined POL in 1985 at the age of 19.
9. The Inquiry have been unable to locate a record of my employment from POL, but from memory, the roles I held whilst employed by POL are as follows:
 - a. **1st April 1985:** I joined the Post Office as a Post Office Counter Assistant within the directly managed network of post offices in the Swansea area.

- b. **1987 – 1996:** I was Branch Manager, responsible for the day-to-day management and financial performance of directly managed post offices in Swansea and surrounding areas.
- c. **1996 – 2001:** I was a Retail Network Manager, responsible at an area level for the operational performance of 24 post offices: 6 directly managed branches employing approximately 130 staff, and 18 agency branches in the Cardiff and surrounding areas. As part of this role I was responsible for interviewing and appointing the SPMs, managing performance and dealing with any contract breaches as appropriate.
- d. **2001 – 2005:** I was Head of Area for the rural agency in Wales, responsible for maintaining the provision of Post Office services and the operational performance of the rural network of 950 branches in Wales and the Welsh Marches, through a field based team of 18 managers.
- e. **2005 – 2006:** I was General Manager for the Community Network of branches, responsible for a team of 9 senior managers and a field based team of 40 managers, and for overseeing the day-to-day operational and financial management of 9,000 rural and 500 urban branches.
- f. **September 2006 – March 2009:** I was National Network Development Manager. I was part of the team that designed, developed and deployed the process (known as the Network Change Programme) to deliver 3,000 changes to the Post Office network (2,500 closures and the establishment of 500 new type services).

- g. **April 2009 – November 2010:** I was Network Change Operations Manager, through a UK wide team of circa 50 managers, I was responsible for maintaining the size and shape of the post office network through post office branch relocations, refurbishments, re-openings, new operating models and formats in line with POL's Network Strategy.
- h. **December 2010 – August 2012:** I was Head of Network Services, through a UK-wide geographically dispersed field team of 200 people, delivering a yearly average of 120 network change projects (i.e. branch relocations, refurbishments, closures and re-openings) across the Post Office network; in excess of 5500 financial and compliance branch audits and interventions; new entrant training for approximately 1000 agents/franchisees and employees and; 2000 recruitment and/or contractual interviews. I was also responsible for maintaining the size and reach of the Post Office network, including determining whether branches in new locations should be opened.
- i. **September 2012 – August 2013:** I was Head of Partnerships. I was responsible for the relationship between Post Office and the recognised representative bodies: the Communication Workers Union, Unite the Union and the National Federation of Subpostmasters.
- j. **August 2013 – March 2015:** I was Programme Director for the Branch Support Programme. I was responsible for reviewing the existing level of support that the Post Office provided to branch operators, identifying

gaps and making recommendations/introducing improvements to close those gaps.

- k. **April 2015 – December 2016:** I was Director of Support Services where I was responsible for the Post Office helpline for Subpostmasters (NBSC), the customer helpline, the Financial Service Centre (FSC), the Human Resources Service Centre (HRSC), and also managing the Contract Advisors and Contract Administration teams.
- l. **January 2017 – January 2018:** I was the People and Change Director, responsible for HRSC, Health and Safety and the Change Portfolio (business transformational projects) across the organisation.
- m. **January 2018 – July 2018:** I was People Services Director responsible for HR services within the Finance and Operations business unit, Health, Safety & Well-being and the HR Service Centre.
- n. **August 2018 – May 2020:** I was Business Improvement Director and I worked closely with Counsel and Legal Advisors, to assist in preparing the Post Office case to defend a Group Litigation brought against it (Bates v Post Office (No 3) [2019] EWHC 606 (QB)) whilst simultaneously making improvements to the franchise support model.

10. In addition to my roles detailed above, from 2012 onwards, I was a member of the Working Group, the Initial Complaint Review and Mediation Scheme and the Postmaster Litigation Steering Group. I was also a witness for POL in the Common Issues and Horizon Issues trials (further details below).

11. Since leaving POL in May 2020, after a short period as Head of People with the Football Association of Wales (December 2020 – March 2021), I have operated as a freelance HR Consultant.

THE HORIZON IT SYSTEM

12. In respect of the Horizon IT System, the Inquiry have provided me with the following documents, which I have reviewed and reflected on below:
 - a. **POL00178199** (email from Clive Burton to me on 19 March 2004);
 - b. **POL00041564** (Computer Weekly article dated 11 May 2009);
 - c. **POL00026572** (Rod Ismay Report dated 2 August 2010);
 - d. **POL00088956** and **POL00088957** (emails from John Breeden to me on 5 December 2010); and
 - e. **POL00294728** (email from Tracy Marshall to me on 5 January 2011).

13. Document **POL00178199** (email from Clive Burton to me on 19 March 2004) refers to a Mrs Pugh, who was a SPM at Chirbury Post Office from 21 April 1999 to 3 September 2001, when her contract for services was suspended. The email requests assistance with obtaining information to assist the Legal Services Department with preparing statements for Mrs Pugh's Court case, relating to her final audit and the Post Office accounting system. I did not

remember this email prior to the Inquiry providing it to me so I requested a copy of my response to this email and the subsequent email chain (**POL00178200**). From the email provided, I can see that I forwarded Clive Burton's email to Emlyn Hughes (Contract Manager within my team at the time) to deal with the request for information. Emlyn forwarded the email to contacts within the business (as that information was not within our team), to provide the information to Clive Burton. I can see that this was treated as a routine request for information. I am unable to add anything beyond what is contained in the email chains (**POL00178200, POL00178201, POL00178208, POL00178211, POL00178219, POL00178223, POL00178221** and **POL00178225**).

14. Document **POL00041564** is a Computer Weekly article dated 11 May 2009 entitled '*Bankruptcy, prosecution and disrupted livelihoods – Postmasters tell their story*'. I do not recall seeing this article at the time it was published, or at any time subsequently, prior to it being provided to me by the Inquiry. However, I am familiar with the SPM's cases which it discusses.

15. Document **POL00026572** is the Rod Ismay Report dated 2 August 2010. I had no knowledge or involvement in the preparation of the report. I was not on the initial distribution list and so I did not receive this report when it was first produced on 2 August 2010. In terms of the content of the report, it reinforces POL's understanding and internal messaging at the time that Horizon was robust and that:

- a. Only “authorised” branch users could create or accept transactions in the system
 - b. “all transactions and events are tagged and traceable to the user”
 - c. “Sequential referencing of transactions, customer basket and associated IDS. Prevent gaps, duplications or anonymous transactions.”
 - d. “Audit file and read only control – transaction records securely sealed”
16. Whilst I cannot recall receiving the report, I assume that I would have been reassured by its content at the time. However, knowing what I know now (as a result of the Group Litigation Order trials and what has been presented to the Inquiry), the report in my view was/is inaccurate on a number of points. Importantly, it seems that full investigations were not carried out at the time as Horizon was not considered as a possible or potential factor to the losses and notably the report states that there is an “*absence of ‘backdoors’*” whereas I now understand the Fujitsu Super Users did have access to branch accounts.
17. Documents **POL00088956** and **POL00088957** are two emails from John Breeden to me on 5 December 2010. I do not recall seeing these emails before and requested further disclosure on any response that I made to John’s email, as well as any subsequent emails in this chain to help me understand what I did as a result of receiving these emails. However, POL has been unable to locate any response from me.

18. Document **POL00088957** is an email forwarding me a copy of the Rod Ismay Report. Neither the email nor Rod Ismay's report stick out in my memory as something important that I received prior to the Inquiry. In hindsight, I appreciate the importance of this report in that it reinforced POL's position that Horizon was robust but I cannot recall it registering as something important at the time.
19. Document **POL0008956** is another email from John Breeden to me on 5 December 2010. Again, I cannot recall this email or the content of the pack he attaches. Having reviewed the email, I have noted that Lynn Hobbs (General Manager of Network Support) advised Mike Granville and Rod Ismay that she had *"found out that Fujitsu can actually put an entry into a branch account remotely."* In her email to John Breeden, she says she had discussed with Mike Granville and Andy McLean (POL's senior IT team) were looking into the *"remote access to Horizon issues"* but no update was given at that point. I have asked for any subsequent emails in this chain to help me understand what I did as a result of receiving these emails but POL have been unable to locate a response from me. I would have expected to see something further and my only explanation is that either IT did respond and provided a plausible explanation or else IT did not respond and it dropped off the radar because Lynn subsequently left the organisation and we were getting messaging from the business that disputed it i.e. remote access was not possible. Although I cannot recall, I assume that I satisfied myself that senior people within IT were aware and looking into it and that no further

action was needed from myself unless told otherwise. Again, with the benefit of hindsight, I wholly appreciate the importance of this comment and I have questioned myself, knowing what I know now, as to why it did not register. I have, however, noted that Tracy Marshall's email a month later (document **POL00294728**) also references the ability for Fujitsu to have remote access stating "*Technically, Fujitsu could access an individual branch remotely and move money around however this has never happened yet...so although changes can be made remotely, they would be spotted and the person making the change would be identified.*" I assume that in the period, between December 2010 and January 2011, the issue of 'remote access' was explored by POL with this being the outcome. I have discussed the content of this email in further detail below, in my response to questions about the Ferndown meeting.

20. The below deals with the nature and extent of my knowledge of the Horizon IT system when it was first introduced to the business.

21. As a Branch Manager in the late 90s, I worked with the forerunner to the Horizon IT system for around 1 – 2 years. This system was then replaced by the Horizon IT system which was the same system rolled out to the whole network of post offices from 2000 onwards. I distinctively remember the messaging from the Post Office, that the Horizon system was the largest and most secure system in Europe at that time.

22. In terms of what training I received on the Horizon IT System, I was working as a Retail Network Manager/Area Manager when Horizon was rolled out to sub-post offices. I believe that I received the same level of training as a Branch Manager/SPM, which from memory was around 1.5/2 days. This was at a local hotel where the trainers had set up Horizon equipment for the purposes of training and we were taught how to operate it. I also attended the training sessions that my SPMs and their staff attended (I believe that this was 1 day for counter assistants and an additional half day/day for SPMs and those assistants involved in the preparation and production of the branch cash account) to support them through the process. I do not recall any particular concern from SPMs about the training at the time other than it was going to be a new way of working in branch for them. As Retail Network Managers, we had planned to be in branch with SPMs for their first few cash accounts to offer our support in embedding the training they had received and also to help them with any misbalancing issues should there be any.
23. In terms of ARQ data, I believe that my first knowledge of ARQ data was when Helen Rose used it to look into what had happened at the Ferndown Post Office branch in preparation for the meeting with the SPM on 6 January 2011 (discussed further below).
24. I cannot recall now exactly what detail the ARQ data gave us, however my understanding was that it provided insight into what had happened on the Horizon system at the branch level. It therefore gave the information we needed to piece together the picture of what had happened in a branch.

25. The next reference that I remember to ARQ data was when Helen Rose was looking into the issues experienced at Lepton as part of the Spot Review process with Second Sight in early 2013 (Jan/Feb 2013).
26. Following this, I recall that when the Initial Complaint and Mediation Scheme (“the Scheme”) was established in August 2013, ARQ data was part of the data/information pack that the Case Review Advisors used to investigate the issues raised by the Scheme applications.
27. With the Scheme investigations concluded, the Support Services Resolution Team was created (April 2015) to investigate any issues raised by post office branches as part of ‘Business As Usual’. They used the investigation approach developed for the Scheme and ARQ data continued to be part of the data/information pack (event and transaction logs, Helpline logs, branch trading reports, training records and others depending on the issue raised) used by the team.
28. I don’t believe my knowledge of ARQ changed over time.
29. The first time I recall becoming formally aware of any bugs, errors or defects in the Horizon IT system (“BEDS” – although this wasn’t the term used at the time), was when POL disclosed to Second Sight two anomalies – ‘Receipts and Payments Mismatch Problem’ and the ‘Local Suspense Account Problem’ which were detailed in the Interim Report 8 July 2013 (**POL00099063**). From

memory, Second Sight were putting together their report and the Legal team said that they had been made aware of a couple of anomalies which they needed to disclose. This was the first that I had heard of any bugs so it was a surprise but I remember being reassured by the IT experts that bugs of this sort were pretty routine and computer systems always have errors such as these. Although, looking back at the timeline, this was the first revelation that there were any bugs in the system at all, I do not recall that it set alarm bells ringing as the IT experts were not concerned. The line was that these weren't major, had been spotted and resolved and it was business as usual.

30. Prior to this, I was aware of general 'rumblings' of complaints and concerns about the integrity of Horizon and I believe that when I took over the responsibility for the Contract and Administration team, I became aware of claims that the Horizon system itself was generating the discrepancies in branches. These complaints were further formalised towards the end of 2011, upon receipt of letters of claim from Shoosmiths when we started to engage with Alan Bates/Justice For SPMs Alliance ("JFSA") and later with Second Sight in 2012. However, these complaints and concerns were all against the backdrop of the very strong POL message that the Horizon system was robust and the internally held view that all of these complaints were unsubstantiated claims from disgruntled former SPMs. As mentioned in the paragraph above, it was only when POL disclosed to Second Sight that there were two anomalies within Horizon in 2013, that there was any suggestion the system was not fool-proof but, even then, a rational explanation was provided by IT experts. The strong message from POL continued to be that 'remote

access' by either Fujitsu or POL employees to alter data in branch accounts was not possible.

31. Pre-2011, I had no knowledge of the ability of Fujitsu employees to alter transaction data or data in branch accounts without the knowledge or consent of SPMs. In early 2011, I received an email from Tracy Marshall (**POL00294728**) (discussed in further detail below) which made me aware that Fujitsu employees could, in theory, have remote access but not without the knowledge of SPMs.

32. Below, I have detailed the key messages from POL on remote access/integrity of the Horizon system that shaped my understanding over the years. These extracts all show a strong message that Horizon was robust and altering data via remote access was not a plausible explanation for branch discrepancies. I highlight these extracts to try to help the Inquiry to understand what the internal messaging was within POL at the time in respect of remote access. Where concerns were raised, there always appeared to be a rational explanation that countered the initial allegation. I do not think that this was just from a PR perspective, but a genuine belief which appeared to be supported by IT experts. Despite clarification being sought over the years the message that Horizon was robust, never changed.

- a. **18 June 2012:** Document **POL00027722** is a meeting pack, put together for a meeting with James Arbuthnot and other MPs scheduled

for 18 June 2012. This contains speaking notes for Paula Vennells which states *“I am confident about the integrity of Horizon; it was built on robust principles of reliability and integrity. It has undergone many external audits and no problems of this nature have ever been raised.”*

- b. **8 July 2013:** Document **POL00099063**. Second Sight’s Interim Report quotes Ed Davey (Postal Affairs Minister) – *“However, POL continues to express full confidence in the integrity and robustness of the Horizon system and also categorically states that there is no remote access to the system or to any individual branch terminals which would allow the accounting records to be manipulated in any way.”* This was at a time when two bugs had been disclosed but, in my mind, were reviewed and dismissed as minor.
- c. **9 April 2014:** Document **POL00148075**. Update on Deloitte’s work to Project Sparrow subcommittee – *“Although no system could be absolutely “bullet proof”, no issues had yet been identified through the cases being investigated or any other route that has called into question the integrity of Horizon. Nor have any wide-spread systemic faults been identified since Horizon online was implemented.”*
- d. **25 July 2014:** Second Sight’s Part One Report (**POL00004439**)– *“Post Office has advised that a limited number of security personnel at Fujitsu had read-only access to this audit server. Post Office has additionally confirmed that it is their understanding that it is not, and never has been, possible for anyone to access Branch Data and*

amend live transactional or stock data without the knowledge of the Subpostmaster or their staff.”

- e. **13 October 2014:** Approved POL messaging from POL Comms team (**POL00091394**) – *“Our current line if we are asked about remote access potentially being used to change branch data/transaction is simply: ‘This is not and never has been possible’. There is no remote access for individual branch transactions. Fujitsu has support access to the ‘back-end’ of the system used for software updates and maintenance. This is of course strictly controlled with security processes in place, but could not, in any event, be used for individual branch transactions – there is no facility at all within the system for this.”*
- f. **January 2015.** POL written submission to the Department of Business, Innovation and Skills (“BIS”) (now known as the Department for Business, Energy and Industrial Strategy) Select Committee – *“There is no functionality in Horizon for either a branch, Post Office or Fujitsu (suppliers of the Horizon system) to edit, manipulate or remove transaction data once it has been recorded in a branch’s account. It is possible for Fujitsu to view branch data in order to provide support and conduct maintenance but this does not allow access to any functionality that could be used to edit recorded transaction data.”¹*
- g. **March 2015:** POL’s draft response to Second Sight’s Thematic Issues Report (**POL00022382**) – *“There is no functionality in Horizon for the*

¹ <https://committees.parliament.uk/work/1803/post-office-mediation/publications/>

Post Office or Fujitsu (suppliers of Horizon) to edit, manipulate or remove transaction data once it has been recorded in a branch's accounts. The Post Office can only post additional, correcting transactions to a branch's accounts but only in ways that are visible to Postmasters e.g. transaction corrections (TC) and transaction acknowledgements (TA). It is also possible for Fujitsu to view branch data in order to provide support and conduct maintenance but this does not allow access to any functionality that could be used to edit recorded transaction data."

- h. **April 2015:** POL's Response to Second Sight's Briefing Report Part Two (**UKGI00000018**) – *"To be clear, Horizon does not have functionality that allows Post Office or Fujitsu to edit or delete the transactions as recorded by branches".*

- i. **17 August 2015:** Final statement for Panorama (**POL00231477**)**"Remote Access.** *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."*

- j. **22 August 2015:** Statement from POL's in-house lawyer (**POL00091401**) – **"Remote Access.** *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 account 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."

- k. **21 July 2016:** Remote access wording presented by Bond Dickinson to PLSG (POL00024802) – **"Balancing transactions.** *Fujitsu (not Post Office) has the capability to inject a new "transaction" into a branch's accounts. This is called a balancing transaction...A balancing transaction can add a transaction to the branch's accounts but it cannot edit or delete other data in those accounts. Balancing transactions only exist within Horizon Online (not the old version of Horizon) and so have been in use since around 2010...Access to databases.* There are a small number of persons at Fujitsu (not Post Office) who have special permissions to access and edit, within strict controls, the databases and servers that sit behind Horizon. Use of these permissions is logged and so there would be an audit trail of any activity undertaken using these permissions...During the Scheme, it was alleged that Post Office had the ability to 'remotely access' Horizon in order to conduct transactions. This allegation is understood to mean that a Post Office (or Fujitsu) employee could log on to a terminal in a branch from a different location outside the branch and conduct (or edit or delete) customer transactions. To be clear: this is not possible."

33. When presented with this information, I took the experts at their word. To learn that this was incorrect shocked me deeply.
34. In the midst of this messaging, there were genuine cases where SPMs complained about Horizon IT system causing issues but, when investigated, it was proved that they (or their assistants) caused the error. I remember distinctively a SPM writing to Paula Vennells that an error had occurred in his branch. He was extremely diligent and experienced and was confident that he had not caused the error and that therefore it must be the Horizon system. Paula asked me to investigate and so my team went to the branch. Unusually, the SPM had CCTV positioned so perfectly, you could see the counter transactions. The team honed in on a Saturday morning transaction, which was a £1k deposit into a bank account. In the CCTV footage you can see the SPM serve the customer and process the £1k deposit on Horizon, however rather than taking a £1k from the customer he mistakenly gave the customer a £1k as if the customer was making a withdrawal. This resulted in a £2k loss on balancing. It was instances such as this that leaned me more towards the thinking that discrepancies were more likely to be caused by user error rather than issues with Horizon, as even the best SPM could make mistakes.

OPERATION OF POL AND HORIZON

35. The below deals with my involvement and oversight in the following matters:
- a. Provision of advice and assistance to SPMs in respect of disputed shortfalls
 - b. Training on the Horizon IT system
 - c. POL's audit of SPM's branch accounts and/or seeking the recovery of alleged shortfalls in branch accounts
 - d. POL's procedures for resolving disputes with SPMs in respect of discrepancies in branch accounts
 - e. POL's prosecutorial function
 - f. POL's handling of complaints made by or litigation involving SPMs in which the integrity or adequacy of the Horizon IT System was raised

Provision of advice and assistance to SPMs in respect of disputed shortfalls

36. Prior to 2011 I had no involvement in the provision of advice and assistance to SPMs in respect of disputed shortfalls.
37. In terms of how often SPMs would raise concerns about the Horizon IT system, I am not aware of this information or that it was specifically tracked within Royal Mail (pre 2012) or POL from 2012 onwards.

38. The immediate reporting route for Post Office branches for problems with Horizon was the Horizon Service Helpdesk (Fujitsu) and/or the Network Business Support Centre (NBSC – “the Helpline”). From what I recall, if a disputed shortfall was a result of a Transaction Correction, the SPM would contact the FSC. If they were unable to assist, they would refer to the Dispute Resolution Manager (Andrew Winn) for further investigation. If the disputed shortfall was due to an in-branch misbalance, the SPM would ring the Helpline for assistance in the first instance. If still disputed, they would again be referred to the FSC and/or Dispute Resolution Manager for investigation. This was both pre and post 2011.
39. When the Scheme was established in August 2013, I led POL’s investigation into the issues raised in the 150 cases submitted to the scheme. Part of this investigation process was to look into the level of advice and assistance that had been provided to SPMs. On looking at the detail of the advice and support provided to some SPMs in the Scheme I was disappointed to see a lack of support from Area Managers/Retail Network Managers in some cases. These were roles that I had done previously, and I had gone out of my way to provide the best support I could to SPMs, on occasions working late into the evenings to do so and I was disappointed to see that some SPMs did not receive what I regard as an appropriate level of support.
40. The Helpline was the first port of call for SPMs who were having issues with Horizon and from April 2015 – December 2016, as Director of Support

Services, part of my responsibilities included oversight of the Helpline, which included identifying its shortcomings and trying to fix them.

41. On 24 October 2016, I co-authored a paper with Marc Reardon that stated *“Horizon Help (the in-branch support tool) has since its introduction over a decade ago fallen short of delivering the in-branch self-help functionality that was promised as part of Horizon roll-out and that postmasters and their assistants desperately need.”* This paper has not been disclosed but is referenced at paragraph 420 of *Bates v Post Office Ltd* [2019] EWHC 606 (QB). The paper shone a spotlight on the weaknesses of the system as I wanted to land the point about its shortcomings to get a business case over the line for its improvements. Whilst the Helpline was adequate in terms of its content, it wasn't the easiest or quickest to navigate. I remember that I wanted to upgrade the system so that it operated like a google search, where SPMs could search for an issue and get a response quickly. Another issue, was that Helpline operators were relying on the SPM to describe the problem accurately so that they could assist, whereas often the SPM didn't know what had caused the problem. I can recall wanting to put in place a system whereby SPMs could share their screen with the Helpline operators to improve the assistance that Helpline could offer. Unfortunately, this was never implemented. I regret that I was not able to get either of these improvements implemented.

42. In considering whether the advice and assistance available to SPMs was adequate, my view is yes on the whole, however I think this depended very

much on the person who was supporting the SPM. As mentioned above, the Scheme revealed that there were occasions when the Area Managers or Retail Network Managers did not provide what I regarded as adequate support.

Training

43. Pre-2011, when the Horizon IT system was being rolled out to Post Office branches, I had been a recipient of that training in my role as Retail Network Manager. As detailed above, I also attended the training sessions that my SPMs and their staff attended, to support them through the process and on roll out, I along with my colleagues, supported SPMs in branch with their first few cash accounts.
44. In my view, the initial Horizon IT training in advance of roll-out in 1999/2000 appeared to be adequate for the SPMs within my area. From memory, some SPMs adapted better than others and in my role as Retail Network Manager I was on hand to support where required but I don't recall any particular issues with the training. For new SPMs and staff appointed post the Horizon roll-out, using the Horizon system was embedded into the new entrant training. Again, I don't recall any specific issues.
45. From December 2010 – August 2012, as Head of Network Services, I had responsibility for the Audit and Training team. I believe at this time they were called Field Support Advisors. My oversight of this team was to ensure that

training was appropriate and delivered to a good standard and that the team was appropriately resourced. The scheduling of training was done by the Scheduling & Admin team. Feedback on the quality of the training delivered was tracked through a customer satisfaction survey that those receiving the training were asked to complete at the end of their training.

46. In this role I initiated a review of the new entrant training approach which was led by the Network Support Projects and Standards Manager. Upon review, the training for new entrant SPMs needed to be reconfigured as it pretty much was a one size fits all and didn't reflect the new Post Office models e.g. Mains, Locals, outreaches and their specific training requirements (Mains did the full range of products and services whereas Locals had a limited range). This review resulted in a revised training approach that better recognised the different types of post offices in the network and therefore made the training more relevant.

47. In my role as Branch Support Programme Director from August 2013 – March 2015, we looked into issues around training. Problems identified and rectified included: introducing an introductory call to new SPMs 2 weeks before they took up post; replacing a telephone call 1 month after they had taken up post with a branch visit from a trainer; refreshing training on balancing to help SPMs identify and resolve balancing problems earlier.

POL's audit of SPM's branch accounts and/or seeking the recovery of alleged shortfalls in branch accounts

48. As noted above, from December 2010 – August 2012, as Head of Network Services, I had responsibility for the Audit and Training team. This role including having general oversight of the auditing team to make sure that they did their jobs properly and were adequately resourced. Audits were scheduled by the Scheduling & Admin team. There were different types of audits: risk based audits were scheduled using a tool (Branch Performance Profile) that used a number of criteria the details of which I can't remember now, however I believe holding more cash in branch than it should was one; Special Audits, which were requested usually from P&BA (later known as FSC), the Fraud Forum or the Security team in response to concerns they had; and Transfer Audits, which were done when transferring a branch from the outgoing SPM to the incoming SPM. Audits were also requested to establish actual loss following a robbery or burglary at a branch. The Network Support Projects and Standards Manager (direct report to me) produced a report each month on the summary of the findings at audit which fed into a quarterly report I did for the Audit & Risk Committee that I attended (**POL00141432** is the Q1 2012/2013 report).

49. Another area of focus for me was spending time with the Field Support Advisors and their Team Leaders to understand the mood within the team and importantly what was affecting that mood - what was working well, what

wasn't, what were the improvement opportunities - so that we could constantly improve as a team in supporting SPMs better.

50. Should an audit uncover a shortage, under the terms of the SPM contract, failure to make good a shortfall could be escalated to the Contract Manager as a potential breach of contract. Again, as Head of Network Services I was responsible for the Contract Managers. Their role was to investigate whether there was breach of contract and, depending on the seriousness of any breach, they would consider whether action was necessary, taking into account any mitigating circumstances usually discussed during an interview with the SPM.

POL's procedures for resolving disputes with SPMs in respect of discrepancies in branch accounts

51. Prior to 2011, I did not have any involvement in, or oversight of, resolving disputes with SPMs in respect of discrepancies with branch accounts.
52. From August 2013 – March 2015 I was Branch Support Programme Director. The Branch Support Programme sought to make improvements for SPMs by addressing key issues raised in the Second Sight Interim Report and some issues raised in the Scheme, including helping improve procedures for resolving disputes with SPMs in respect of discrepancies in branch accounts. For example, there was criticism that the process for resolving disputes was slow. I used the programme to refine processes so POL reacted more

responsively to reports of unexplained losses by fast-tracking them to the Branch Support Team for resolution. If further investigation was needed, the case was referred to the Mediation Case Review team (later called the Support Services Resolution team) who had the benefit of real time data tool from Fujitsu, enabling analysis to be undertaken at the point it happened rather than waiting for historical data to be gathered.

53. I also looked into suspensions and in 2014 I introduced 'suspended termination', a new category of action in dealing with material breaches of contract. The usual process was, if a discrepancy was found which was over a certain amount (from memory I think £1,000), the SPM would be suspended immediately pending investigation. The new approach recognised that the previous policy of precautionary suspending the SPM whilst investigations were done, potentially damaged the reputation of the SPM in their community regardless of whether the SPM was reinstated or not. The essence of the new approach was that suspending a SPM was the last resort. The majority of the investigative work was to be done in advance of the audit (rather than after the audit had taken place, as per the previous approach) and the Contracts Manager was to work with the SPM to establish the facts and then take the appropriate action, keeping the SPM in post and the branch operational wherever possible. This reduced the number of SPM suspensions by around 50% in the year of its introduction.

54. From April 2015 – December 2016, my role as Director of Support Services included oversight of the FSC. Originally, it was part of the FSC role to help resolve disputes with SPMs in respect of discrepancies at branch accounts. This work was migrated to the Support Services Resolution Team from 2015 onwards, part of my broader team who used the investigation approach developed for the Scheme.

POL's prosecutorial function

55. I had no involvement with, or oversight of, POL's prosecutorial function.

POL's handling of complaints made by or litigation involving SPMs in which the integrity or adequacy of the Horizon IT System was raised

56. From memory, these were all handled by POL's Legal team, although requests for information were routinely made to the Contracts and Administration team, for example for training and audit records. When I became a member of the POL JFSA Steering Group, I believe that my role was to help coordinate any requests for information from my Network Services team, although I cannot recall the specifics.

57. In addition, as part of the Second Sight Spot Review process, I coordinated information from within POL to assist Second Sight with their investigations. I was also a member of the Working Group, the purpose of which was to

oversee/ensure a fair and transparent process for applicants to the Scheme.

Further details on the Scheme and my involvement in it are below.

FERNDOWN INTERVIEW

58. The below deals with my recollection of an interview undertaken in respect of the Ferndown Branch, Dorset on 6 January 2011. In answering the Inquiry's questions about the Interview, I have reviewed the interview notes **(POL00294743)**.

59. I first became aware of the Ferndown branch when Lynn Hobbs (General Manager Network Support) contacted me about providing a mobile Post Office service near to the Ferndown branch if it were to close/remain closed. The closure was as a result of an audit and subsequent suspension of the SPM. I advised Lynn that I could provide a mobile post office to be set up near the branch however I did not think that it would cope with the volume of business that Ferndown transacts (this was a sizeable post office).

60. Although I do not recall the precise date that I was contacted, it would have been prior to December 2010 and before I was appointed to the Head of Network Services role. I can remember that this was a high-profile case, as it had attracted a lot of media attention and had been raised with Dave Smith (POL Managing Director at the time) and Paula Vennells, to whom Lynn Hobbs reported direct.

61. My next involvement was when Kevin Gilliland, Network Director, asked me to attend an interview with him due to my line manager (Sue Huggins – a direct report to Kevin) being away on holiday. The interview was to be with the SPM of the Ferndown branch, Mrs Rachpal Athwal and to take place on 6 January 2011. From POL's perspective, I believe that the overarching purpose of the meeting was to reset the relationship with the SPM and her husband, following the suspension of the SPM due to a discrepancy at the branch. The SPM and her husband didn't believe that they were responsible for that discrepancy and so the focus of the meeting was to find out what had happened in the branch to generate the discrepancy.
62. Helen Rose, from the Security and Investigations team, was also asked to attend the interview, to provide an insight into what had happened in the branch using the relevant reports from the Horizon system. Helen's role at the interview was to walk through what the Horizon information was indicating had happened in respect of user activity on the Horizon system. My role in the meeting was to support Kevin (who led the meeting) in providing a more operational level of knowledge and experience. This was the first time I had ever attended an interview with a SPM and I think that I was asked because Kevin's operational experience was limited, whereas I had more extensive and recent operational experience from working closely with branches.
63. The transcript from the interview is at **POL00294743**. During the interview I stated that nobody in POL could remotely access the in-branch Horizon system because it is all done from a user ID. I also said that nobody from

Fujitsu could go in and amend the accounts without having been seen to have done so. This information was based on an email received from Tracy Marshall the day before the meeting (5 January 2011) (**POL00294728**). In this email Tracy stated *“POL cannot remotely access systems and make changes to specific stock units etc.”* She also stated that Fujitsu can remotely access systems but *“although changes can be made remotely, they would be spotted and the person making the change would be identified.”* I understand that Tracy provided this information specifically for this meeting. I had not been involved in this previously and would not have had first-hand knowledge or experience of this level of detail on Horizon and from my comments in the transcript, I seem to have taken this information from Tracy at face value. I would not have had any reason to doubt its accuracy and whilst I cannot remember my thought process at the time, I expect I was reassured by her experience and the fact she has stated *“the authority process required and the audit process are robust enough to prevent this activity [changes made remotely] from being undertaken fraudulently.”* With hindsight and a better understanding of what access Fujitsu had into individual branch accounts, I know now that the information I provided in respect of Fujitsu was incomplete. At the time, I did not know that to be the case.

SHOOSMITHS LITIGATION

64. The below deals with the nature and extent of my involvement in POL’s response to the litigation threatened by Shoosmiths / Access Legal who were acting for several former SPMs who had come together in the JFSA.

65. In answering the Inquiry's questions on this issue, I have reviewed the following:
- a. **POL00046944** - This is a letter of claim in respect of Mr Wilson (former SPM), dated 23 August 2011. I do not recall having seen this letter before although I can see that it is referenced (but not attached) in document **POL00176467**.
 - b. **POL00294879** - The Inquiry have referred to this document as 'Terms of Reference for Steering Group'. As I understand it, this is an email from Rod Ismay to the proposed members of a JFSA Steering Group and whilst it sets out the purpose of the Group and the current situation in respect of Shoosmiths (Access Legal), it does not detail any terms of reference.
 - c. **POL00176467** – This is an email from me to my Network Services lead team, ensuring that they were aware of the advice from POL's legal team in respect of the JFSA cases.
66. From my recollection, POL's response to the litigation threatened by Shoosmiths / Access Legal was very much led by the Legal team. Having reviewed **POL00294879**, my involvement was predominately due to the Ferndown meeting (detailed above). However, as Head of Network Services, the Contracts and Admin team, trainers and auditors were part of my responsibility and so I would have been able to facilitate the provision of information/documents from my team that the Legal team required. My role

meant that I was in a position to get information to lawyers as quickly as possible. I later became the 'go to' person for information (for the Spot Review with Second Sight and then the Scheme) as I knew my way around the business and if I didn't know the answer myself, it was highly likely that I knew the person who did.

67. In terms of POL's strategy in responding to the Shoosmiths litigation, this was prior to the 2012 separation and so would have been led by Royal Mail rather than POL. I don't recall seeing anything that set out any strategy however, as detailed in the email from Rod Ismay to proposed members of the JFSA Steering Group (**POL00294879**), the purpose of that group was *"To define and manage a coordinated response plan which defends existing challenges and deters future challenges, in the most pragmatic and efficient manner"*. I can remember that this was the approach and tone of the discussions that took place, with the lead being taken by Royal Mail's Legal team.
68. In my email dated 21 October 2011 (**POL00176467**), I forward an email from Emily Springford of the Legal team, which gave instructions around three headings: document preservation; document creation; and information required to respond to letters before action. My email asks everyone to read Emily's email and lists three bullet points, which appear to be my interpretation of the key takeaway points from each of these headings:

- a. *“preserve all documents which might potentially be relevant to these claims...”*
- b. *“Mark communications in relation to these cases and as detailed below as “legally privileged and confidential”*
- c. *“Treat any request for information in relation to these cases as a priority”*

69. The Inquiry have specifically asked me why I wrote the second bullet point – *“Mark communications in relation to these cases and as detailed below as “legally privileged and confidential”*. I believe that this was my key takeaway point from Emily’s instructions under the heading ‘Document Creation’ and so I wanted to highlight it to the team, as I had highlighted my key takeaway points from the other two headings.

70. My email to the team was to ensure that they were sighted on the potential legal action in respect of these cases and that they were aware of, and complied with, the instructions set out in Emily’s email. I was passing on the instructions from the Legal team and my email was intended to summarise Emily’s email, with the overarching message that her email should be read in full.

71. The Inquiry have asked to what extent, if at all, legal professional privilege was used within POL to try to prevent the disclosure of documents that could

prejudice its position in relation to the Horizon IT System. During my time with POL, I do not believe that it was.

ENGAGEMENT WITH MPs IN EARLY 2012

72. Preparing responses to MPs or journalists was the responsibility of the Communications Team. As I understand, when they received a question, they would reach out to the relevant contacts within POL to obtain information for any response and may ask for the content to be reviewed for accuracy before they responded.
73. In terms of the extent to which I was involved in preparing POL's response to MPs who raised concerns about the integrity of Horizon in early 2012, my involvement was to provide information, when requested, to those within POL who were preparing a response. An example of this approach is in **POL00085836**, where I actioned a request from Simon Baker with my team to provide documentation of our SPM appointment and training process.
74. I have also been provided with, and reviewed, documents **POL00113791** and **POL00027722**:
- a. Document **POL00113791** is an email from Susan Crichton to Alice Perkins and Paula Vennells on 6 June 2012 which attaches the Terms of Reference for Second Sight. I was copied into this email but I was not involved in setting or agreeing the Terms of Reference for Second Sight.

- b. Document **POL00027722** is a meeting pack for a meeting with Lord Arbuthnot and other MPs on 18 June 2012.

75. The Inquiry have asked about my involvement in briefing Paula Vennells, Alice Perkins and other senior managers or Board members on the integrity of the Horizon IT System (including remote access). I did not do the briefings on the integrity of the system (including remote access) and I did not have the technical knowledge to be able to do this. Any such information came directly from Fujitsu (Pete Newsome was the Fujitsu Account/Relationship Manager assigned to POL) and was passed on/briefed to senior managers by either/ a combination of: the POL IT team and / or the Project Sparrow team. I was very much in 'receiving mode' in respect of any information/messages regarding the integrity of the Horizon system i.e. I did not brief any senior managers / Board members but was myself a recipient of the information.

76. Whilst I do remember going to the meeting with Lord Arbuthnot on 18 June 2012, I do not remember much about the meeting itself. I do, however, remember the prior meeting with James Arbuthnot and Oliver Letwin, held at the Post Offices in Old Street on 10 May 2012 and I believe that the meeting on 18 June 2012 was a follow-on from this initial meeting. I believe that my involvement in the preparation for both meetings was to pull together the information on the two cases – Hamilton and Merritt – to be able to explain to the MPs from the information we had, what had happened in these cases and to provide any further information as per the action points in document **POL00137248**.

77. I cannot recall the specifics as to my involvement with POL's response to MPs and journalists who raised concerns as to the integrity of the Horizon IT System, however, typically my involvement related to issues that a SPM constituent had raised with their MP. I did meet (usually accompanied with Patrick Bourke) with some MPs at the request of their constituent to discuss their issues/Scheme case as appropriate). I also attended the meetings with MPs – 10 March 2012 and 18 June 2012. In respect of journalists, other than the Panorama meeting 9 June 2015, my involvement was usually to provide information to the Communication Team for them to respond to the journalists.

INSTRUCTION OF SECOND SIGHT

78. I had no involvement in POL's decision making process in respect of the appointment of Second Sight or the ambit of its investigation. I believe that these decisions were joint between Alice Perkins (POL Chair), Paula Vennells (CEO) and POL Board and that it was endorsed by the MPs (predominately Lord Arbuthnot) and JFSA. I recall some internal discussions about getting an external IT expert, such as Deloitte (or another appropriately qualified organisation), to do a deep dive into the Horizon system, but this was dismissed in favour of Second Sight.

79. In terms of the ambit of its investigation, I have reviewed **POL00113791**, Second Sight's Terms of Reference as is detailed in the email from Susan Crichton to Alice Perkins dated 6 June 2012 and **POL00022378** POL's Initial

Complaint Review and Mediation Scheme Report which states that *“the Post Office commissioned Second Sight Support Services Limited to carry out an independent review of its Horizon computer system, which is supplied to the Post Office by Fujitsu Services Limited, in response to allegations by a small number of former Postmasters about the integrity of that system.”*

80. The document also states *“The basis of Second Sight’s initial engagement, was reflected in a document for Postmasters entitled “Raising Concerns with Horizon”...and included to: “Consider and advise on whether there were any systemic issues and or concerns with the Horizon system including training and support processes, giving evidence and reasons for the conclusions reached.”*
81. My working recollection of the ambit of Second Sight’s investigation was that they were to investigate the issues regarding Horizon raised by SPMs via their MP and/or JFSA. Following the feedback from Second Sight that they couldn’t look in isolation at the Horizon system but rather they also needed to consider associated elements, their scope broadened to include looking at: training and support provided to SPMs; operational processes including balancing; branch trading and transaction corrections; interfaces with other systems e.g. lottery machine, ATMs; power supply and telecoms equipment; and the effectiveness of POL’s audit and investigative processes.

82. As to who had responsibility for the extent of its access to relevant information and documents, the flow of information and documents was, in the main, through the Project Sparrow. When the Scheme was established, the Working Group (chaired by Sir Anthony Hooper) did, I believe, also have oversight of the provision of relevant information and documents. In terms of my role, due to my operational experience, I could effectively bridge the gap between Head Office and SPMs so I would often be asked to provide information.

83. I have laid out below my review of the following documents which the Inquiry have provided to me in respect of Second Sight:

- a. **POL00186110** (email from Simon Baker to me and others on 8 April 2013);
- b. **POL00296463** (email from me to Simon Baker on 9 May 2013);
- c. **POL00115919** (draft briefing note to Paula Vennells dated 2 July 2013);
- d. **POL00141432** (Post Office Branch Audit Trend Analysis dated 7 September 2012); and
- e. **POL00065349** (my draft letter to Karen Lumley MP).

84. Document **POL00186110** is an email from Simon Baker (Head of Business Change and Assurance) to myself and others dated 8 April 2013. The email states that, to ensure that there is appropriate governance for the Horizon investigation, Simon is setting up a monthly project and governance board.

The broad terms of the Board and how it relates to the overall project governance are attached (**POL00186111**). This states that there will be three levels of governance: Sponsor Board; Project Board and Team Meeting.

85. Document **POL00296463** is an email from me to Simon Baker on 9 May 2013. This email relates to 4 'Spot Review' responses that I was asked to comment on. This is an example of where I might be involved to provide information/comments due to my operational experience. My comments reflect my approach of working openly and transparently with Second Sight and in the spirit of what we agreed:

“Intentionally not answering questions raised by 2nd Sight will in my view give rise to suspicion i.e. that we have something to hide and is not in the spirit of our interaction/engagement with Ron and Ian. By trying to dodge answers that may not present POL as positively as we would like will in the long term come back to bite us. I would much rather be upfront from the start. There is always a risk that our policies, procedures and processes would come under the spotlight and in some cases be deemed to not be as good as some would expect whether this expectation is reasonable or otherwise – this was a risk I believe we accepted from the start and whilst the integrity of the Horizon system may be intact we should not ignore any lessons that come out of these investigations.”

86. Document **POL00115919** is a draft internal briefing note to Paula Vennells on 'Second Sight review into Horizon – Implications of Interim Report'. This was a briefing note prepared for Paula in advance of her meeting with James Arbuthnot MP, to update her on the likely content of Second Sight's Interim Report and the potential risks associated with it.
87. Document **POL00141432** is a Post Office Branch Audit Trend Analysis dated 7 September 2012 written by me. Annexed to this is a flow chart to investigate Horizon claims from branches. At page 3 of this document I have stated *"discrepancies in branch are typically as a result of a cash error over the counter..."* Without seeing the information that sits behind the summary table, I am unable to say exactly why I concluded this to be the case, however what I have set out as examples reflected what I understood to be the most common causes of discrepancies within branches through my experience at that time.
88. Document **POL00065349** is a draft letter from me to Karen Lumley MP responding to a letter sent from Karen to Paula Vennells on 11 June. Although undated, I assume that this was in 2015. The letter is in relation to Julian Wilson's case and it explains the Scheme and that mediation is a voluntary process for both parties. Having reviewed the letter, I take from my response that POL would not mediate this case due to a previous Court ruling/conviction. The Inquiry have asked me how I satisfied myself that the contents of this letter were accurate. I cannot recall from memory and as I have only had sight of this letter and no related correspondence, I can only

say that any correspondence that I drafted/sent in relation to the Scheme had the input from the Project Sparrow team, POL's legal team and the Comms team. I am therefore confident that I would have satisfied myself of its content through discussions and verification with them.

89. As to how senior managers within POL viewed Second Sight and the purpose of its investigation, in my view there were two parts to Second Sight's investigation: the investigations as part of the Scheme and the investigations pre this scheme i.e. Spot Reviews. From my observations, the senior managers within POL (connected with Project Sparrow) who engaged with Alan Bates/JFSA and subsequently appointed Second Sight, did so with a genuine desire to get to the truth. That is, to find out if there was any substance in the claims from JFSA and other SPMs through their MPs, that the Horizon system was responsible for the losses in their branches that they had been held responsible for by POL. I think the view of Second Sight changed over time, when there became a frustration at the slow delivery of any output. I have provided further detail on Second Sight below.

The Helen Rose Report

90. The below sets out the nature and extent of my involvement in the creation of the 'Helen Rose Report' dated 12 June 2013 (**FUJ00086811**) and POL's response to the same. The report looked into a transaction that took place at Lepton SPSO 19130 on 4 October 2012 for £76.09. On the same day, the

payment was reversed and the branch was issued with a Transaction Correction for £76.09. However, the SPM denied reversing the transaction.

91. Other than my correspondence with Helen Rose on the Lepton Spot Review (**POL00144296** and **POL00134139**), discussed further below, I had no involvement in the creation of the Helen Rose report. I am not aware of who Helen shared it with, or what POL's response was to the report at the time.
92. Looking at the background correspondence that the Inquiry have provided me with, document **FUJ00229801** is an email chain in January 2013 with correspondence initially between Gareth Jenkins (Fujitsu IT engineer) and Helen Rose and then between Gareth Jenkins and myself. It concerns me requesting Gareth Jenkins to carry out a formal investigation into the Fujitsu transaction log for Lepton 191320.
93. Document **POL00144296** is an email from Helen Rose to me on 7 February 2013. Here, Helen is raising concerns about the transaction log for Lepton about information in ARQ not being visible in Credence. She is also raising concerns that *"the recovery session is showing as a normal existing reversal rather than a system recovery reversal"*. I have not been provided with, and cannot recall, my response. After this length of time, I cannot recall who I discussed the detail of this with. However, in trying to establish what had happened in this situation, I do remember discussing the issue with Ron Warmington (Managing Director of Second Sight) as part of the Spot Review process. However, I cannot remember the exact detail of those discussions.

94. Document **POL00134139** is an email from Helen to me on 13 February 2013, forwarding email correspondence between her and Gareth Jenkins flagging concerns that Horizon system based corrections and adjustment transactions are not clear on either Credence or ARQ logs, as shown with the Lepton logs. I cannot recall my response and have requested a copy of my response to Helen's email but POL could not locate this which indicates that I did not reply to Helen via email. I may have had a conversation with her to discuss the email but, given the passage of time, I cannot remember.
95. I did not share the report with, or brief others in senior management, Board members, SPMs or MPs on the report. I cannot recall when I first became aware of the report. I have asked POL for a copy of the covering email from Helen Rose to recipients of the report but they are unable to locate this email. I seem to remember that it was brought to my attention by the Legal team as they were preparing for the Group Litigation Order.
96. The Inquiry have asked to what extent, if at all, did the matters concerning ARQ raised in the Helen Rose emails and / or the Helen Rose Report made me or anyone else at POL concerned that past convictions may be unsafe. Whilst I cannot speak for anyone else, personally I did not make any connection to the safety of past convictions from the emails from Helen Rose or the Helen Rose Report. Whilst I realise that this sounds naïve, prosecutions were outside of my area of responsibility and indeed my knowledge scope. I took no view on how they were put together, other than to

be assured that they were done in line with the Crown Code for Prosecutors, with oversight of both internal and external lawyers. Here, the focus was on the case in front of me. I wasn't aware of any practical procedures around disclosure and whilst I do not know if Helen discussed her findings with anyone else within POL, my assumption would have been that she would discuss anything important with her line manager and ultimately the Head of Security and Investigations.

THE INTERIM REPORT AND THE INITIAL COMPLAINT REVIEW AND MEDIATION SCHEME

97. The below deals with the nature and extent of my involvement with: a. POL's preparation for and response to Second Sight's reports; and b. the Scheme and the Working Group established to monitor the Scheme ("the Working Group").
98. I can confirm that I have reviewed the following documents provided to me by the Inquiry in respect of this subject matter:
- a. **POL00099063** (Second Sight Interim Report) dated 8 July 2013;
 - b. **POL00298004** (document entitled "Update on the work programme arising from the Horizon report" dated 26 July 2013) – although not headed as such, this reads like a Board Update paper;
 - c. **POL00190036** (email from Simon Baker to Alwen Lyons, copied to me, on 2 July 2013) and **POL00190037** (attachment) – the email is simply a cover email with no narrative. The attachment lists two

incidents/defects shared with Second Sight and detailed in their Interim Report 8 July 2013;

- d. **POL00116057** (email from Lesley Sewell to me and others on 9 July 2013) – this is an email with Lesley setting out actions ahead of a call on 9 July 2013;
- e. **POL00089711** (Branch Support Programme Terms of Reference v2);
- f. **POL00137327** (email from Susan Crichton to me on 25 July 2013) – this is an email regarding Brian Altman QC's terms of engagement which was forwarded to me and Alwyn Lyons as we were not on the original recipient list.
- g. **POL00193074** (email from Simon Baker to me and others on 31 July 2013) and **POL00137343** (attachment). The email is a cover email for sending the attachment which is the Weekly Steering Group meeting minutes for 1 August 2013. This appears to be setting out the approach for the initial cases from James Arbuthnot and JFSA which was pre the Mediation Scheme;
- h. **POL00027664** (draft Terms of Reference for the Branch User Forum);
- i. **POL00105634** (note of meeting on the Mediation Scheme and Branch Improvement Programme) – I was in attendance to provide an update on the Scheme and any improvements made to business processes etc.;
- j. **POL00043640** (notes of the Working Group meeting on 17 October 2013);
- k. **POL00026625** (notes of the Working Group meeting on 25 October 2013);

- l. **POL00043622** (notes of the Working Group meeting on 7 November 2013);
- m. **POL00043635** (agenda of the Working Group meeting on 22 November 2013);
- n. **POL00043624** (notes of the Working Group meeting on 28 November 2013);
- o. **POL00027505** (draft settlement policy for the Scheme v1.3)
- p. **POL00043625** (notes of the Working Group meeting on 5 December 2013);
- q. **POL00026634** (notes of the Working Group meeting on 19 December 2013);
- r. **POL00026638** (notes of the Working Group meeting on 3 January 2014);
- s. **POL00026682** (notes of the Working Group meeting on 9 January 2014);
- t. **POL00026639** (notes of the Working Group meeting on 16 January 2014)
- u. **POL00026640** (notes of the Working Group meeting on 23 January 2014) – note that POL action to remind the business that files are not to be destroyed – Chris Aujard;
- v. **POL00026641** (minutes of the Working Group on 30 January 2014);
- w. **POL00026635** (minutes of the Working Group on 6 February 2014);
- x. **POL00138101** (notes of the Mediation Scheme Programme Board meeting on 17 January 2014);

- y. **POL00043626** (note of meeting of the Working Group on 13 February 2014);
- z. **POL00026637** (minutes of the Working Group meeting on 27 February 2014);
- aa. **POL00026656** (notes of the Working Group meeting on 7 March 2014);
- bb. **POL00026644** (notes of the Working Group meeting on 27 March 2014);
- cc. **POL00026633** (notes of the Working Group meeting on 1 April 2014);
- dd. **POL00148075** (minutes of the Project Sparrow subcommittee on 9 April 2014);
- ee. **POL00026642** (notes of the Working Group meeting on 10 April 2014);
- ff. **POL00138282** (notes of the Initial Complaint Review & Case Mediation Scheme Programme Board on 11 April 2014);
- gg. **POL00303871** (my email to Kathryn Alexander and another on 22 April 2014);
- hh. **POL00061368** (email chain on 22 April 2014 regarding the disclosure of officers' reports); This appears to be an unfinished internal discussion on approach to routinely provide Officer's Report with the POIR. My view was that we should assess on a case by case basis but proceed with caution in respect of the Officer's Report as per the legal advice provided. I did request from POL the subsequent email chain so that I could understand how the discussion concluded. The further disclosure (**POL00169322**) did not provide a conclusion. I cannot from memory recall how we proceeded;

- ii. **POL00043627** (minutes of the Working Group meeting on 6 May 2014);
- jj. **POL00304439** (email from me to Kathryn Alexander on 9 May 2014) and **POL00117650** Email chain between Andy Winn and Alan Lusher 2008 (email from Andrew Winn to Alan *Lusher on 23 October 2008*); Email from Andy Winn to Alan Lusher (23/10/2008) stating that *'the only way POL can impact branch accounts is via the TC process. Fujitsu has the ability to impact branch records via the message store but have extremely rigorous procedures in place to prevent adjustments being made without prior authorisation within POL and Fujitsu'*;
- kk. **POL00026657** (minutes of the Working Group meeting on 15 May 2014);
- ll. **POL00026659** (minutes of the Working Group meeting on 20 May 2014);
- mm. **POL00026668** (minute of Working Group meeting on 5 June 2014);
- nn. **POL00026664** (minutes of Working Group meeting on 12 June 2014);
- oo. **POL00140431** and **POL00026673** (minutes of the Working Group meeting on 16 June 2014);
- pp. **POL00026665** (minute of Working Group meeting on 26 June 2014);
- qq. **POL00026672** (minutes of the Working Group meeting on 10 July 2014);
- rr. **POL00026671** (minute of the Working Group meeting on 17 July 2014);
- ss. **POL00026683** (minute of the Working Group meeting on 24 July 2014);

- tt. **POL00004439** (Second Sight Briefing Report Part One dated 25 July 2014);
- uu. **POL00026674** (minute of the Working Group meeting on 31 July 2104);
- vv. **POL00029749** (email from me to Andrew Parsons on 2 August 2014).
This relates to concerns about M025 POIR which discloses a Horizon incident that affected circa 3000 branches. POL was aware at the time and communicated with affected branches via 'memoview' as was the case with M025. The issue here was that POL did not disclose this incident to Second Sight along with the 2 it did disclose to them for their Interim Report. I don't recall anything about this other than what is in the documents disclosed to me;
- ww. **POL00026676** (minute of Working Group meeting on 28 August 2014);
- xx. **POL00026679** (minute of the Working Group meeting on 4 September 2014);
- yy. **POL00026680** (minute of the Working Group on 11 September 2014);
- zz. **POL00101361** (my email to Richard Weaver and another on 11 September 2014). Bryan Hewson, SPM was a member of the Branch User Forum. He was bringing his concerns about the impact of silence from POL on a very serious matter. I accepted his concerns and raised with Mark, Comms Director;
- aaa. **POL00026685** (minutes of the Working Group meeting on 16 September 2014);
- bbb. **POL00209634** (my email to Chris Aujard and others on 22 September 2014 - my email highlights concerns about Second Sight Part Two

- Report) and **POL00209636** (attachment - copy of the POL letter (signed by me) sent to recipient of SS Part Two report);
- ccc. **POL00043628** (minutes of the Working Group meeting on 25 September 2014);
- ddd. **POL00026684** (note of the Working Group meeting on 2 October 2014);
- eee. **POL00091394** (Melanie Corfield's email to me and others on 13 October 2014);
- fff. **POL00107151** (letter from Alan Bates to Sir Anthony Hooper dated 10 November 2014). Alan sets out his concern that the Scheme is not in the spirit of what was agreed when it was set up and is not delivering for applicants what they expected when they entered into it;
- ggg. **POL00043630** (minutes of the Working Group meeting on 14 November 2014). Alan Bates raised his concerns about the Working Group in a letter to the Chair - these were discussed at the meeting;
- hhh. **POL00213728** (note of a team meeting on 11 December 2014). This was the agenda of a meeting with my Branch Support Programme core team. Meeting purpose: To consider the improvement opportunities from the Scheme; Second Sight's Thematic Issues; and the individual case investigations with a view to incorporating into the Branch Support Programme which is tasked with improving the effectiveness and efficiency of the support we provide to our branch operators in the running of their post offices;
- iii. **POL00150195** (email from Mark Underwood to Mark Davies, copied to me, on 14 December 2014) and **POL00150196**;

- jjj. **POL00101858** (my email to Rodric Williams on 14 December 2014);
- kkk. **POL00109809** (email from me to Alwen Lyons on 18 December 2014);
- lll. **POL00022296** (note of meeting on 9 January 2015);
- mmm. **POL00043633** (minutes of the Working Group meeting on 14 January 2015);
- nnn. **POL00219926** (email from Belinda Crowe to Andrew Parsons, copied to me, on 25 January 2015);
- ooo. **POL00022297** (email from Andrew Parsons to Chris Aujard, copied to me, on 27 January 2015). Although I've not seen the attachments, this email is about providing the information requested by Second Sight. Andrew Parsons refers to him and me discussing this with Rod to see if we could provide the information requested by Second Sight. The conclusion was that it was a significant undertaking to do that due to the number of products;
- ppp. **POL00043634** (minutes of the Working Group on 13 February 2015);
- qqq. **POL00022380** (my email to Mark Underwood and others on 7 March 2015) and **POL00022381** (POL's draft response to SS Thematic Issues Report) and **POL00022378** (POL's Initial Complaint Review & Mediation Scheme Report). **POL00022383** has not been disclosed to me;
- rrr. **POL00117183** (my email to Mark Davies on 7 March 2015) Mediation Scheme Press release comments and **POL00117184** (attachment);
- sss. **POL00151569** (draft speaking note for 10 March 2015). This was for my telephone call to Alan to advise that all cases can proceed to Mediation and of the cessation of the Working Group;

- ttt. **POL00029849** (Second Sight's Briefing Report – Part Two dated 9 April 2015);
- uuu. **UKGI00000018** (POL's Reply to Second Sight's Part 2 report);
- vvv. **POL00228264** (letter from Mr Withers to Tom Wechsler dated 7 May 2015, enclosing my letter of 27 April 2015). I do not recall these letters or the rationale behind the letters. Whilst it is my signature on the letters, these would have been the result of a business decision. I did not act independently on any matters related to the Scheme;
- www. **POL00168655** (my letter to Mr Withers on 21 May 2015).
- xxx. **POL00043631** (8 December 2014 Working Group meeting minutes)

99. As stated above, I was not involved in any decision making relating to the ambit of Second Sight's investigation or the extent of its access to relevant information or documents other than as stated at 'hh' above.

100. When Second Sight were engaged, it was against a very credible background. As can be seen in their presentation slides at **POL00113791**, they had good technical and stakeholder credentials. However, as time went by, we found their output to be very slow and minimal. They were engaged in around June/July 2012 to investigate 47 cases and by the time we received the interim report a year later (**POL00099063**), only 4 of these cases had been investigated and the investigations into these still weren't concluded. Progress felt very slow and disorganised, and POL was getting frustrated as we had MPs and JFSA criticising us for the length of time being taken for cases to progress. In response to this frustration, the Scheme was created, in

an attempt to try and focus on getting a quicker output for SPMs (please see below for further details on the Scheme).

101. Paragraph 4 of **POL00298004** states that there are two concerns around Second Sight: the first that they do not have the capacity to deal with all of the cases within an acceptable timetable and the second is in relation to their approach of *“seeking to reconcile the conflicting evidence and views of the Post Office and sub-masters...”* Given that this was a Board update, these were clearly concerns held within POL, although I am unable to remember who specifically held these views. In respect of the first point, as noted above, I was concerned about the lack of progress by Second Sight in producing the Spot Reviews. I cannot recall any detail in respect of the second point but I believe that the concern was that Second Sight was not concluding their investigation reviews as quickly as they should have been and this was perhaps due to them spending too much time going back and forth between the applicants and POL.

102. The Scheme was set up in August 2013 following this note. As such, Second Sight’s focus changed from reviewing the cases put forward by MPs and JFSA, to those who applied to the Scheme (although I believe that many of the SPMs in the original cases for review subsequently became applicants to the Scheme). Consequently, Second Sight’s initial Terms of Reference were, I believe, superseded by the Scheme Terms of Reference as agreed by the Working Group.

103. POL's strategy in preparing responses to applications and / or Second Sights

Report was as follows:

- a. **Preparing responses to Scheme Applications.** On receipt of the Case Questionnaire Report (CQC) from the applicant to the Scheme, the CQC was assigned to a Mediation Case Review Advisor/Handler to investigate the issues raised by the applicant. The Case Review Advisor/Handler would then produce the Post Office Investigation Report ("POIR") with their findings. This was reviewed by the Mediation Case Review Manager and then passed to me for further review, which included ensuring the issues raised had been fully investigated, a full explanation of the findings set out in the report (with supporting evidence) and easy to understand language (rather than technical jargon). The final review step was with POL's Legal team. Once internal review checks were complete, the POIR and supporting evidence was passed to Second Sight for them to undertake their independent review of the issues raised by the applicant and produce the Case Review Report.
- b. **Preparing responses to Second Sight Reports.** I believe that this was a coordinated effort across POL with the Project Sparrow team holding the pen on the drafting of the responses, with others (the Legal team, the Communications team and myself for Scheme cases and operational matters) feeding into, reviewing and providing comments on the content of the responses.

104. In terms of POL's approach to disclosing documentation to Second Sight, for the Scheme cases, the approach was that the POIR (along with supporting documents), was disclosed as a pack to Second Sight. For those cases with a criminal conviction, the legally privileged material that POL would not make available to the defendant or Court would not be provided to Second Sight. I understood this to be in keeping with the standard practice for prosecutors. This approach was agreed by the Working Group. For any other documentation, requests from Second Sight were referred to the Project Sparrow team for consideration and coordination.

105. To enable the timely provision of information from Fujitsu, a project manager was assigned from within Fujitsu to facilitate the requests from POL. This was in the main, the provision of ARQ data and from memory, it worked well. If the Case Review Advisors/Mediation team had any queries on that data or required further information, I believe that the Fujitsu project manager facilitated the responses to those requests. Pete Newsome was the Relationship/Account Manager for the POL account and I believe that some requests/queries were progressed by him.

106. I was not involved in the review of past convictions obtained in reliance on data generated by Horizon. This was done by the Legal team.

107. I was aware that Second Sight had raised concerns in respect of POL's suspense account and that POL may have unexplained profits caused by

SPMs settling illusory discrepancies. Al Cameron (Chief Financial Officer) was identified as the appropriate POL person (along with Rod Ismay) to have discussions with Second Sight. However, I was not involved in this investigation.

108. Within the email chain at **POL00061368** I say to Andrew Parsons that the disclosure of officers' reports *"needs to be addressed on a case by case basis as you suggest but with a presumption against disclosure"*. Here I was agreeing with his earlier advice and playing it back to him. The Inquiry have asked in what circumstances I thought the presumption against disclosure should be displaced – if the relevant information had not been provided in other documents then my view was that in some cases the officer's report should be disclosed as per my thoughts in respect of M054 (POL00061368)

109. Document **POL00022296** is a meeting note from 9 January 2015. The purpose of this meeting was to discuss the responses that POL had provided to the 97 questions posed by Second Sight on 9 December 2014, with a view to enabling them to progress their Part Two Report.

110. I recall that POL was providing a huge amount of information (perhaps tens of thousands of documents) to Second Sight during their period of engagement. I remember that there were some ongoing discussions and disagreements about the provision of information in relation to: Suspense Accounts (the request was deemed too wide); Bracknell emails (I think this was genuinely a misunderstanding of dates although I was not involved in the provision of this

information or discussions around it); and legally privileged documents (POL had provided the same documentation it would to the defence in a prosecution case). This was agreed to be the appropriate approach (i.e. in line with standard procedure) at the October 2014 WG meeting.

111. The Branch Support Programme was a response to the issues raised (i.e. training and support could have been better) by Second Sight in their interim report.

The Scheme and Working Group

112. As noted above, the Scheme was born out of the fact there were ongoing concerns about Horizon potentially being the cause of losses, and Second Sight's lack of progress in producing outputs and conclusions from their Spot Reviews.

113. Working Group was formally put in place slightly after the Scheme launched, to have independent oversight over the Scheme. The Working Group designed the format of the Scheme, such as setting out the application process and the approach to be adopted by POL Case Review Advisors/Investigators. The approach was to investigate each issue raised by the applicant and produce a POIR detailing the findings of that investigation with the supporting evidence. This report was then passed to Second Sight for them to undertake their investigative review, produce their report and make their recommendation to the Working Group on whether the case was suitable for mediation. POL would then also provide their view on the suitability of the

case for mediation and, if deemed suitable, the Project team liaised with the applicant, POL and a mediator.

114. My role within the Scheme and the Working Group was to, on behalf of POL, lead the team of Case Review Advisors/Investigators who would be carrying out the investigation and drafting the POIR. I had a North and South team (with 10 case review advisors/investigators in each), each led by a manager with extensive Post Office operational experience. The managers sent each draft case POIR for my review and my review involved ensuring that each of the issues raised had been investigated, their findings explained (in an easy to understand language) and that the findings were supported by evidence. My involvement in the Scheme was prompted by my involvement in the Ferndown interview, but I wanted to take on this role as I had a genuine desire to understand if there was any substance in these complaints. I saw this as an opportunity to investigate the cases properly and reconcile the disconnect between POL and SPMs.

115. As a member of the Working Group I was involved in drawing up the Working Group's Terms of Reference and its scope. However, I cannot recall any detail around this.

116. In terms of direct involvement with the mediations, they were allocated among the senior team according to availability and experience. From memory, I

dealt with 3 mediation cases, although my memory around these is limited other than to recall that one settled, two did not.

117. As a member of the Working Group, my role in attending its meetings was to provide an update on the progress of the Scheme cases and any issues and / or recommendations in relation to individual cases. I also provided information on / answers raised by the Working Group in relation to the POL operation, policies and procedures. Where I did not know the answer first-hand, I took the action to find out and report back. I also participated in the Working Group discussions where my experience, knowledge and skill sets enabled me to.

118. The Working Group became more structured and focused on the progress of the individual cases as time went on. In my view, all parties were committed to a thorough investigation and making the process as simple as possible for the applicants. However, there were periodic frustrations within the Group as to the time they were taking, compounded by the ongoing expectations of MPs, Applicants (and their advisors), JFSA and POL. Discussions at the meetings could be challenging however in my view, the Working Group process did, in the main, work relatively well.

119. From memory, any briefings on the Scheme were led by the General Counsel and/or the Project Sparrow team. Whilst I do not recall any specific briefings from memory, I would have provided Scheme cases information i.e. progress of the cases through the Scheme and anything that senior management needed to be aware of, such as the death of Martin Griffiths.

120. In document **POL00107151** Alan Bates criticises the Scheme stating “*JFSA is now of the opinion that the Scheme has strayed so far from the original purpose for which it was intended, that the few Applicants who have actually reached a mediation meeting through CEDR have expressed disappointment with the Scheme, that at least one Applicant has withdrawn.*” From reviewing this letter and subsequent discussions at the next Working Group meeting, his view was that the role of Working Group was not in line with that of JFSA’s and indeed, what had been agreed in the Working Terms of Reference. I disagree with Alan’s view that POL had become more “*entrenched and defensive*” as the Scheme progressed “*and the original concept of actually seeking the truth has long since been abandoned, replaced by denial and a culture of blaming the Applicant time after time.*” I genuinely wanted to get to the truth and to find out what had caused the issues for the applicants of the Scheme, and I invested a huge amount of time and effort in a full and thorough investigation into the issues raised, as far as the evidence enabled us to. The findings detailed in the POIR were the outputs of those investigations. Our approach in the mediations was also a genuine desire for both parties to have a better understanding of each other’s position and hopefully move closer to closure for the applicant.

121. In terms of the extent that I was involved in POL’s internal communication regarding challenges to the Horizon IT system, I would usually have been asked to comment on draft communications regarding content and tone. I do not believe that I saw a policy document, however from memory the approach

was to keep the communications factual, proportionate and focused on key points/messages.

122. In the email at **POL00303871** I state *“please ignore the comment from SS that POL’s investigations are inadequate – this was Ron having a pop in an attempt to cover his lack of output.”* Whilst I can’t recall the discussions that took place, from the minutes of the Working Group meeting on 17 April 2014 at **POL00026652**, I can see that Second Sight were behind on their agreed timeline for a number of cases. The POL team of case review advisors/investigators led by Kathryn Alexander (South team) and Shirley Hailstones (North team) had been working incredibly hard to conclude their POIRs to the agreed timeline whilst ensuring a thorough investigation into the issues raised by the applicant. I probably made this comment as I did not want Ron’s comments to demoralise the team.

123. At the time, I did not have any concerns that either myself, or others responding to applications to the Scheme, were not receiving accurate and/or complete information regarding BEDs, remote access or the integrity of Horizon as I believed that we had all of the relevant information from Fujitsu that enabled us to undertake a thorough investigation of each case.

124. The Inquiry have asked why I think that POL’s investigation of allegations made by SPMs in the Scheme did not identify new BEDs that caused discrepancies in branch accounts, a lack of integrity in Horizon or the extent of remote access. I cannot answer other than to say that the information that the

investigators received did not evidence or point to any of these issues. In the older cases that were reviewed, due to the passage of time, the information that would have pointed to these issues was not available.

125. The Inquiry have asked for my views on the reasons or motives for SPMs making applications to the Scheme and / or campaigning in respect of Horizon. Whilst every SPM had their own reason and motive, my experience was that many SPMs felt that they had unresolved issues that they wanted closure on, whilst others had issues that they did not understand and were looking for explanations. Some SPMs had suffered significant losses and felt that they deserved compensation and saw the mediation as the route to achieving this. For those that campaigned, they did so in my view as they felt that they had not been listened to or received satisfactory redress from POL.

126. I have reviewed document **POL00109809**. In general, I did not think SPMs who campaigned and/or spoke to journalists did so to avoid settling debts to POL for which they thought that they were liable, however, in this particular instance, as I said in the email, I did believe this to be the case. Seeing this SPM on the Panorama show was particularly disappointing as we had been working with him over a period of time to get to the bottom of what was causing the losses in his branch. In this case, there was evidence that the losses were caused by SPM error.

Project Sparrow

127. From memory, as the Terms of Reference have not been disclosed, the purpose of Project Sparrow was to oversee the running of the Mediation scheme by effectively creating structure and making sure that the Working Group got what they needed. For example, providing secretariat support, providing updates to POL Board, coordinating messaging on remote access and setting up meetings in relation to suspense accounts. The project was headed up by Belinda Crowe and worked closely with the Communications team. I was not a member, but I occasionally sat in on meetings

128. I do not recall being advised of the rationale as to why the Project Sparrow committee became a formal subcommittee of the Board.

129. I do not recall any specific policies or strategies being discussed/formulated in response to complaints made about the Horizon IT System, other than the Scheme approach as agreed with the Working Group and those implemented by the Branch Support Programme.

130. With the Post Office investigations completed into all the Scheme applications, POL took the decision to put forward the mediation of the remaining cases (other than those subject to a previous Court ruling). This decision removed the need for the Working Group to determine whether a case was suitable for mediation. Consequently, the Working Group was no longer required. The rationale is set out in my speaking note **POL00151569**.

131. I had no involvement in the decision to close the Working Group. However, I did ring Alan Bates to advise him of that decision ahead of him receiving written confirmation.

132. The Inquiry have asked to what extent, if at all, do I think that the Scheme fulfilled POL's intended purpose. As I recall, the Scheme was established as a mechanism for applicants to set out their Horizon related (and other) issues for POL to investigate and provide a POIR and offer mediation where suitable. Where not suitable, the applicant was offered a direct discussion about the investigation findings. Therefore, in my view, the Scheme did in the main, fulfil its intended purpose. That said, I felt some disappointment that despite our best efforts, a number of applicants were not satisfied with the mediation process and/or the outcome of the mediation meeting with POL.

133. Project Zebra is not something I remember so I do not believe that I was involved in, or aware, of it.

Branch Support Programme

134. The report from Second Sight and the Scheme raised key issues with the way things were being run and the Branch Support Programme was created to address these issues.

135. The programme was implemented through normal project management principles, with the establishment of a governance structure, including a

Programme Board and a project plan with key milestones and deliverables. The project plan has not been disclosed. However, I can recall that one of the core values was to stand in the SPM shoes. I felt that I had to work really hard to get people to understand the day-to-day job of an SPM and how difficult it could be for a SPM to get everything running properly. The art of a good SPM was making that look easy. In addition to the issues identified through Second Sight and the Scheme, I took the opportunity to see what other improvements we could make as an organisation through the programme. These improvements are set out in POL Board Report updated 20 February 2014 at **POL00027454**.

136. I led the Branch Support Programme as Programme Director from August 2013 – March 2015 with Gayle Peacock being accountable for running the Programme on an operational level.

137. The Terms of Reference v.2 and v.3 disclosed (**POL00002194** and **POL00148920**), detail the purpose of the Branch Support Programme as being *“to understand the current business purposes, operational procedures and ways of working which are in place to support branches, identify gaps and produce recommendations to rectify the issues.”* I should flag that I am not sure whether this was the final Terms of Reference as the final version has not been disclosed. However, either way, I recall that the Terms of Reference was later reworded to reflect the extended scope of the programme as detailed in the POL Board update February 2014 on the Branch Support Programme (**POL00002194**): *“The purpose of the Branch Support*

Programme is to improve the effectiveness and efficiency of the support we provide to our sub postmasters and operators in the running of their Post Offices from an operational and engagement perspective.” This is the purpose statement that I recognise and that aligns with my understanding of the Branch Support Programme at the time.

138. The programme had the backing of Paula Vennells to get changes made quickly and because of that, I felt that it was really effective as things could be acted upon fast without the usual bureaucracy for approval. For example, I recall that there was an issue that if a customer paid for foreign currency on a card, the usual process was that the SPM had to print an additional receipt and record the last 4 digits of the customer's card on that second receipt. Should fraudulent activity be discovered on the card, the SPM would need to produce that receipt or else be held liable for the funds. SPMs had been held liable for this before and so my view was for something that important, the system should automatically generate the second receipt with the necessary information. I therefore took steps through the programme to get this change put in place.

139. Another issue that came to the programme was with a MoneyGram scam. Individuals rang branches, saying that they were engineers and asking a SPM to do a test transaction. The individual on the phone would talk the SPM through the transaction and effectively steal the money via the MoneyGram transfer of money process. POL had clear instructions that MoneyGram transactions could only be done when the customer is in front of them so that

they can take ID and the money. Therefore if an SPM fell victim to the scam, they would be held liable for not following the correct process. I seem to remember that one branch fell for the scam over 9 times, becoming liable for around £40k. To try to prevent this happening again, through the programme we put in place, a message notification would pop up at the beginning of the transaction saying *'we will never ask you to do a test transaction over the phone.'*

Branch User Forum

140. Paula Vennells asked me to set up the Branch User Forum as a mechanism for the voice of the SPM to be heard by senior managers at the heart of the organisation. It was an opportunity to bring them inside the organisation in a way that we had never done before.

141. This purpose and objectives of the forum are set out in the Post Office Branch User Forum Terms of Reference document dated 18.10.2013

(POL00196510):

"Purpose

The purpose of the Branch User Forum is to provide a way for sub-postmasters and others to raise issues and insights around business processes, training and support directly feeding into the organisation's thinking at the highest level. The forum is a forward looking mechanism

to ensure the business processes and approaches are fit for purpose for users and are in keeping with Post Office behaviours and values.”

Objectives of the Forum

- a. To assess issues raised from with the Post Office network; identify appropriate solutions and recommend improvements to rectify the root cause and prevent recurrence of the issue.*
- b. To assess issues raised from Post Office support/central functions; identify appropriate solutions and recommend improvements to rectify the root cause and prevent recurrence of the issue.*
- c. To input into the design of the end to end process for new products and services before launch to the Post Office Network.*
- d. To assess improvement suggestions from the Post Office network and support/central function i.e. ‘would this work?’”*

142. In terms of membership, I put out a memo to the network saying that we wanted to give SPMs an opportunity to feed into the thinking of POL at the highest level and asked them to apply with a paragraph to tell me why they should be selected. I remember that I wanted full representation with SPMs from branches of all shapes and sizes, from smaller traditional post offices to large city post offices. I then brought in a number of senior people within POL to represent different functions, for example Network, IT and Commercial. The Subgroup members were also senior managers who took responsibility for actioning and responding to any issues/questions raised during the Branch User Forum meetings. Depending on the issue/topic they may have attended

some of the Branch User Meetings to provide an overview of their respective function/work area and/or update on any actions they had responsibility for.

143. The forum was very much positioned as a confidential, safe place to have a conversation with 'Chatham House Rules' applying, which was really important to the functioning of the forum. From memory, there were around 6 SPMs and 6 POL representatives, with me chairing. I remember that we also had a federation representative and a union representative but both were on the basis that they were wearing their SPM hat whilst in the forum. I didn't want to shy away from any conversation.

144. As Chair, it was my duty to give SPMs their voice and making sure that the business understood what they were saying and equally, to make sure the SPMs understood the implications of the actions they wanted. There were some very challenging conversations but some really successful results and it was something that I was very passionate about. At times the forum was about educating and at other times it was about making changes. There was a session on Second Sight and the Branch Support Programme so there were some conversations around the Horizon system but the main focus of the forum was looking forward and making improvements. I remember that we took the forum to Chesterfield so that they could see how FSC worked and Paula Vennells attended another meeting so questions could be put to her.

145. I also wanted to use the forum as a test bed for new products so if POL was proposing a change it would come to the forum first so SPMs could share

their feedback. I felt that this was invaluable as we were taking out the niggles in processes and preventing errors upfront.

146. I requested copies of the agenda and minutes for the Branch User Forum meetings that I chaired. POL has provided the dates of 22 meetings held during the period that I was Chair, from November 2013 – January 2017 inclusive, and have provided agendas with minutes for approximately half of those. From these, the range of discussion areas can be seen to cover predominately (especially in the earlier meetings) feedback on issues with some products (e.g. Drop & Go); communications to branches via Memoview and Branch Focus; improvements to processes on Horizon (e.g. cheque rem out, Bureau second receipt).

147. The last meeting I attended was January 2017. I handed the Chair role over at this meeting to Mark Ellis the Network Operations Director. Unfortunately I received anecdotal feedback from a couple of the SPMs that the forum lost its momentum and impact as senior manager support and attendance dwindled at the sessions. I'm not aware if the Branch User Forum is still in place today.

148. In terms of the nature and content of any briefings that I gave to those working on the Branch Support Programme or the Branch User Forum in relation to Second Sight's Interim Report or the Helen Rose report, my recollection is as follows:

- a. **Branch Support Programme** – a key focus of the programme was the key issues raised by Second Sight in their Interim Report (July 2013) and the themes of the Scheme. Whilst I can't recall exactly whether the Interim Report was shared in its entirety (although I would normally have done this and so my working assumption is that I did), the key issues would certainly have been briefed to the Branch Support Programme Board and the core Branch Support Programme team for the same subsequent improvements to support and processes to be made. I do not believe that I shared the Helen Rose report with the Branch Support Programme members.
- b. **Branch User Forum** – I cannot remember whether I provided the Second Sight Interim Report or the Helen Rose report to the Branch User Forum. However, **POL00294615** is a slide deck about the Branch Support Programme (dated 17 July 2014), which was established to review the lifecycle of the SPMs' experience with Post Office; to "fix" the issues identified in the Second Sight report and the subsequent mediation cases and to ensure that any lessons learnt are factored into future ways of working.

THE DEATH OF MR MARTIN GRIFFITHS

149. The below deals with my recollection of the death of Mr Martin Griffiths.

150. In answering the Inquiry's questions, I have reviewed the following documents:

- a. **POL00027757** – This was the email chain of October 2013, notifying up the line the tragic news that Martin Griffiths had passed away.
- b. **POL00027757** - email to Andrew Parsons on 1 September 2014. Please note that the Inquiry have provided the same reference in respect of the above document.
- c. **POL00306234** – This is an email from Lauren Griffiths to me on 2 September 2014, expressing her disgust at the treatment of POL to her family following the death of her father and asking me to escalate the matter. My response to Lauren and the internal emails leading up to that is at **POL00116698**. I say how sorry I am that she feels that her and her family have been let down by the POL and for what they have been through, as well as outlining the steps that POL have taken to support them. In a letter of 5 September 2014 I offer a discretionary payment of £140,452 to Gina Griffiths, Martin’s wife, which is equivalent to the sum offered to SPMs who chose to leave POL as part of the Network Transformation (“NT”) programme, for which Martin was not formally eligible for as he had been served 3 months’ notice of contract termination by POL.
- d. **POL00306171** – This is an email from me to Andrew Parsons on 4 September 2014. **POL00306172** is the attachment to the email. These emails are about putting in writing the NT payment equivalent offer to Gina in respect of Martin’s prior request to exit POL via NT programme. This was following the meeting I had with Gina Griffiths and her brother in Chester on 1st September 2014.

- e. **POL00219796** – This is an email from Rodric Williams to me on 22 January 2015, sharing a copy of the Settlement Agreement with Gina and asking us to confirm a few points around the intention of the agreement.

151. I also requested and received additional disclosure in respect of this case, which is listed in the annex below.

152. In terms of my involvement in POL's response to the tragic news that Mr Griffiths had taken his own life, to the best of my recollection I believe that Kevin Gilliland (Director of Network and Sales) rang Gina Griffiths, Martin's wife, to offer his condolences and I think that he suggested to her that I would be in touch to offer whatever support I could. After making initial contact with Gina (by telephone I believe) I became the contact within POL for Gina. As stated in my response to her daughter, Lauren Griffiths (**POL00116698**), I tried to assist operationally and financially by arranging for a temporary SPM to run the Post Office branch, agreeing the rental amount to help with the overheads of the business and making an exceptional payment to Gina in October 2013.

153. I met with Gina and Martin Griffith's mother in November 2013 at their request at a local pub (a few weeks after his death) to discuss their preference for the future of his Post Office branch. I then met with Lauren in London (November 2013) to answer whatever questions she had at the time. I later met with Gina and her brother in September 2014 in the lounge area of a hotel and

discussed exceptionally progressing the NT exit payment that Martin had previously expressed an interest in but for which he wasn't formally eligible. I also recall having telephone conversations with Gina over this period as well. The further disclosure shows a degree of regular contact between myself, Gina and Lauren Griffiths.

154. My involvement in POL's decision making in relation to offering Gina Griffiths a discretionary payment was as follows: Martin Griffiths had previously expressed an interest in leaving the Post Office with a NT payment. The payment was a 'loss of office' payment made to SPMs where their existing post office could be transferred to a new SPM. However, when Martin was given 3 months' notice to terminate his contract, he was no longer eligible for the NT payment. I made a case to the business that, in light of the exceptional and tragic situation, we should exceptionally include Hope Farm Road Post Office in the NT Programme and facilitate the transfer of this Post Office to a new SPM, therefore triggering the NT payment to Gina Griffiths. The business agreed, however the payment was to be made within the NT Scheme rules in terms of the approach to a settlement agreement as laid out in the letter at **POL00306172**.

155. Document **POL00027757** contains an email dated 11 October 2013 from Paula Vennells to myself, with others copied in and states the following: "...we need to look at the business: to help me brief this properly to the Board, can you let me know what background we have on Martin and how/why this might have happened. I had heard but have yet to see a formal report, that there

were previous mental health issues and potential family issues...” The Inquiry have asked what response I gave to this request and whether I conducted investigatory work to aim to respond to this request. I can see in the email chain that on the same day, Kevin Gilliland has advised Paula that I was to pull together a brief. From the further disclosure 7th March 2024 I can see that I did liaise with Glenn Chester to provide a brief to Paula on the relevant information on Martin Griffiths’ case.

CORRESPONDENCE WITH DAVID HILL

156. The below sets out my involvement with responding to David Hill’s correspondence regarding the Horizon IT System and any investigation into his concerns. In answering the Inquiry’s questions on this subject matter, I have reviewed the following documents:

- a. **POL00116957** (email chain between 10 December 2014 and 2 January 2015). This contains the original email from David Hill, giving details of an overpayment he received after depositing a cheque and subsequent correspondence within POL about how to respond.
- b. **POL00101966** (email chain between Tom Wechsler and me on 2 January 2015). This contains a re-draft of my proposed response to David Hill. Whilst I can’t remember the discussion I had with Tom, I can see that the final paragraph has been amended from the first draft as in **POL00116957**, with the outcome appearing that I wanted to investigate the issue further, rather than send a response which assumes the error is due to a manual inputting error.

- c. **POL00116960** (my letter to David Hill on 2 January 2015). This is the final letter that was sent to David Hill, based on the drafts in the email correspondence. In the letter I apologise for the error and inconvenience and request further information so that I can investigate what had happened.
- d. **POL00102078** (email from David Hill to me on 28 January 2015). Mr Hill declines my request for further information. I do not remember these emails/letters and cannot recall if any further action was taken.
- e. **POL00319590** (email exchange between Melanie Corfield and Mark Underwood). This is an email from David Hill with Mel's suggested response. I am not a recipient of the email.

157. I do not remember dealing with this before the letters were provided to me by the Inquiry and therefore cannot recall if any further action was taken in respect of them. Looking at my request to Mr Hill for details about the transaction, I obviously wanted to investigate this further to establish what had happened. The working assumption appeared to be that the transaction had been correctly processed in the branch and it was in the processing centre where they entered the deposit value and payment value, that the error had occurred. This is what I wanted to investigate, but wouldn't have been able to without the details of the transaction requested from Mr Hill, which he declined to provide.

158. As noted above, I did not remember this correspondence prior to it being provided to me by the Inquiry and cannot remember exactly what I thought at the time. However, as this transaction was not done during the time of the suspended SPM and was thought to be a processing centre error rather than a branch error, I probably would not have considered this relevant to any criminal convictions.

POL's RESPONSE TO COMPLAINTS FOLLOWING THE MEDIATION SCHEME

159. In addressing the Inquiry's questions on this topic, I can confirm that I have reviewed the following documents:

- a. **POL00089010** (briefing on Panorama);
- b. **POL00140211** (minutes of a Panorama meeting on 9 June 2015);
- c. **POL00152161** (email from Mark Davies to Kevin Gilliland and others, copied to me, on 14 June 2015);
- d. **POL00317725** (entry for a meeting on 24 June 2015);
- e. **POL00317780** (email from Melanie Corfield to me on 24 June 2015), **POL00317781** and **POL00317782** (attachments);
- f. **POL00152439** (email from Mark Davies on 25 June 2015);
- g. **POL00318510** (email from Patrick Bourke to Jane MacLeod on 22 July 2015) and **POL00318511** (attachment);
- h. **POL00168291** (email from Mark Davies to Paula Vennells and others, copied to me, on 5 August 2015);
- i. **POL00231476** (email from Mark Davies to me on 17 August 2015) and **POL00231477** (attachment);

- j. **POL00319556** (email from Mark Davies to me on 20 August 2015). Mark is asking me to review his letter of complaint to the BBC and **POL00319557** (attachment). I don't recall this letter, however if I did review it there should be a response from me but this has not been disclosed.
- k. **POL00029912** (email from Mark Underwood to me on 21 August 2015);
- l. **POL00139183** (email chain between Melanie Corfield and me on 21 August 2015); and
- m. **POL00091401** (email from Rodric Williams to me on 22 August 2015).

160. I cannot recall the exact detail as to the extent to which I was involved in POL's response to concerns raised by SPMs, MPs and journalists about the Horizon IT system. However, I have detailed below a general overview of my involvement, to the best of my recollection.

161. In respect of concerns raised by SPMs, from 2012 onwards, I would have normally been the person to engage with SPMS, for example investigating issues raised as part of the Scheme, dealing with 'Business As Usual' queries (those raised outside the Scheme and after the Scheme had closed) and dealing with general queries within POL that related to SPMs. Where concerns related to remote access issues, POL had pre-approved wording for what we were to say. For example, see **POL00022659** and **POL00022665** which confirms the approved wording as at July 2016.

162. Following the closure of the Scheme, I embedded the investigation approach that we had developed for the Scheme into business as usual via the Support Services Resolution Team. This is the team that I would refer any issues from SPMs to in relation to discrepancies in branch. Depending on the issues raised and/or if the branch was high profile and there was MP or journalist involvement, I may have engaged directly with the SPM or I may have left it to the Support Service Resolution Manager to do so.

163. In respect of concerns raised by MPs, responses to MPs were usually coordinated through the Communications team (including the Executive Correspondence Team) and/or the Project Sparrow team whilst it existed. As noted above, I met with MPs on 10 May 2012 and 18 June 2012, prior to the closure of the Working Group. Whilst I recall that I did also meet with some other MPs and their SPM constituent at their request to discuss particular issues/concerns, I do not remember the dates or precise details. However, typically the discussions were around Horizon or contract termination.

164. In respect of concerns raised by journalists, I can recall that I was part of the meeting with journalists on 9 June 2015 in respect of the BBC Panorama. Prior to seeing the transcript, I did not recall the content of this meeting (**POL00140211**). I do not feel able to add anything beyond what is contained in the transcript. I do not recall attending any other meetings with journalists between March 2015 and April 2016. Nor do I recall being involved in any other responses to journalists during this time, but without access to my calendar, I am unable to be absolutely certain. As noted above, it was the

responsibility of the Communications team to respond to journalists and if they required any information from me, I would respond to their request.

165. I never did any briefings to the POL Board and / or senior managers on the integrity of the Horizon IT System. It was, however, usual for me to do briefings/provide updates on the Branch Support Programme and the improvements made as part of this programme. This programme ended in March 2015 and later briefings that I delivered would have been on the outputs of the Business Improvement Programme/Support Services Transformation programme, again relating to improvements linked to the issues raised in the Scheme.

166. Whilst I have seen that there was a meeting on 24 June 2014 (**POL00317725**) at which the Communications Director, Mark Davies, was due to brief us on media questions in respect of the Horizon system, due to the passage of time, I cannot remember what was said during this meeting.

167. In document **POL00029912**, there is an email from me to Mark Underwood (21 August 2015) asking for POL's "*response to what Richard Rolls said on the programme...I'd like to have a robust response/explanation of the mention of going in by the back door and altering the coding.*" My request for this information was part of my preparation for the mediation of case M005. The mediation statement had mentioned the programme that featured Richard Rolls and I needed to know (in lay terms as I didn't have the technical

knowledge) what he was actually saying and the associated implications so that I was able to discuss it as part of the mediation. It was very typical for us to request IT's input on technical issues when dealing with a mediation as we did not have the requisite knowledge.

168. I did not consider making contact with Richard Rolls and I am not aware of any others at POL making any consideration to interview or make contact with Richard Rolls.

THE SWIFT REVIEW

169. The below deals with the nature and extent of my involvement with POL's instruction of Sir Jonathan Swift and its response to his review. The Swift Review is provided at **POL00006355** and is "*a review on behalf of the Chairman of POL concerning the steps taken in response to various complaints made by SPMs*" dated 8 February 2016. At the outset I should say that I was not involved in POL's instruction of Sir Jonathan Swift and I do not recall seeing a response from POL to his review. I did, however, meet with Sir Jonathan Swift to provide information for his review.

170. I have reviewed the following documents in relation to The Swift Review:

- a. **POL00153379** (action points from a meeting with Christopher Knight on 27 October 2015) – I do not recall attending this meeting;

- b. **POL00153578** (Kendra Dickinson's email to me on 11 November 2015). This is an email request for information from NBSC via me and Kendra for the Chairman's review;
- c. **POL00153691** (Kendra Dickinson's email to Steve Allchorn, copied to me, on 19 November 2015). This is an email from Kendra, providing updated information to the original request from NBSC;
- d. **POL00153696** (Rodric William's email to Jane MacLeod, copied to me, on 20 November 2015). Although I was copied into this email chain, these were legal points that I did not participate in; and
- e. **POL00323294** (Mark Underwood's email to me and others on 16 December 2015). This is an email from Mark requesting information following a meeting with Jonathan Swift and Christopher Knight in relation to the Chairman's review.

171. I was aware of the compilation of the Chairman's Review/Report (as it was referred to within POL at the time) and I did act as a conduit for gathering information for the NBSC. However, I don't recall receiving a copy to read or a briefing on the contents whilst at POL. I can recall that at some point I was told (and this is paraphrasing), that everything is fine with the Chairman's Report and we can continue as we are.

172. In August 2023, I became aware that the report was in the public domain in redacted format and at that point, I downloaded a copy to read. This was the first time that I read it. On reading the report, I remember thinking that the suggested approach of a top down approach to the Scheme investigations in

addition to the bottom up approach that we had adopted was something that I wished we had implemented as it would have been a more complete approach and would have enabled more conclusive findings.

DALMELLINGTON BUG

173. I have been asked to consider document **POL00153527** which is an email from Melanie Corfield me and others on 10 November 2015. Whilst this document does not reference the 'Dalmellington Bug' specifically, my knowledge of the detail of this 'bug' is limited due to the passage of time and I have therefore assumed that 'the issue' referenced in the email is the Dalmellington bug. I believe that this was a bug that impacted Outreaches only (an outreach is not a Post Office in its own right but is attached to a 'core' Post Office and treated as one Post Office branch for the purpose of branch accounts). The issue occurred when the Core Post Office was remitting (transferring /remitting money) money out to the Outreach. I think that they were able to press the button again and transfer of money doubled up. I don't recall what POL's response was at the time.

GROUP LITIGATION

Early stages

174. I can confirm that I have reviewed the following documents:

- i. **POL00025509** (draft terms of reference for Postmaster Litigation Steering Committee);

- ii. **POL00025507** (Rodric Williams' email of 6 June 2016). Cover email from Rod for Postmaster Litigation Steering Committee meeting), **POL00025508** (7th June 2016 meeting agenda) **POL00025509** (Postmaster Litigation Steering Committee TOR), **POL00025510** (Court Claim), **POL00025511** (Letter of claim), **POL00006536** (Womble Bond Dickinson disclosure advice/instruction), **POL00025513** (Agent debt recovery principles), **POL00025514** (Standard agenda template) and **POL00025515** (workplan & actions) (attachments);
- iii. **POL00167538** (email from Rodric Williams to me and others on 8 July 2016 attaching agenda for PLSG meeting on 14th July 2016);
- iv. **POL00024988** (email from Andrew Parsons on 13 July 2016 (WBD one pager advice on each agenda decision point) and **POL00006360** (attachment);
- v. **POL00105719** (agenda for steering group meeting on 20 July 2016). Although this has been described as the agenda, on review this document is Jenny O'Dell's case write up not the agenda;
- vi. **POL00024801** (email from Andrew Parsons to me and others on 21 July 2016) cover email for PLSG meeting and **POL00024802** Remote Access note from WBD;
- vii. **POL00025167** (email from Rodric Williams to Andrew Parsons on 21 July 2016). This is about remote access and what POL's

messaging has been over time. The email references an attachment which has not been disclosed.

- viii. **POL00022659** (email from Amy Prime to me and others on 27 July 2016) and **POL00022665** (attachment); and
- ix. **POL00041259** (email from Andrew Parsons to me and others on 27 July 2016). Proposed letter of response to Freeths and **POL00041260** (attachment - letter of response).

175. The below deals with my role and responsibilities in relation to the group litigation and the nature and extent of my involvement in POL's work and decision-making process in that case.

176. I was not involved with and cannot recall any specifics around POL's general litigation strategy. From memory (and without seeing anything disclosed around this), my understanding was that any strategy was ultimately a Board decision following a recommendation from POL's Group Executive/Legal.

177. I can recall that I sat in on a number of meetings at the early stage as Jane MacLeod (General Counsel and Company Secretary) would keep me in the loop with what was going on. After she left, I felt I wasn't as included as I had been previously.

178. The Postmaster Litigation Steering Group ('PLSG'), of which I was a member, was established with a 'Business As Usual' focus as set out in the Terms of

Reference (**POL00025509**), which had been agreed by the Post Office Group Executive as set out below:

“Terms of Reference. *The objectives of the PLSG are to ensure that Post Office's defence of the Claim:*

- *is proportionately managed;*
- *does not place unplanned constraints or resource burdens on Post Office; and*
- *is consistent with business as usual (BAU) practices, processes and procedures.*

In order to deliver these objectives, the Post Office Group Executive has agreed that PLSG will undertake the following responsibilities:

- a. providing a forum for cross-business discussion of Claim-related BAU issues so that all relevant matters are considered when making a decision;*
- b. providing instructions to Post Office's legal team on BAU/commercial matters;*
- c. maintaining and progressing an Action Plan for Claim-related activity, and monitoring the resources required to deliver against that plan;*
- d. signing of key Claim-related documents;*
- e. monitoring and approving Claim-related expenditure;*

- f. reviewing, challenging and signing of any Communications plans developed as a consequence of the Claim';*
- g. reporting matters to the Group Executive as appropriate.”*

179. In terms of general litigation, my team (those previously involved in the Scheme investigations) were investigating the lead cases and making sure that the Legal team had the right information. I was heavily involved in conversations with Womble Bond Dickinson from an operational standpoint as they would use me as a sounding board to ask questions and explain to Counsel how things worked 'on the ground'. My role was very much as a provider of facts, rather than any decision-making.

180. The advice from Counsel was that we had a better than 50% chance of winning and therefore there was a general sense of comfort within POL that we had a sound case and it was proper that we should be defending this.

181. I do not recall being part of either the decision-making process for disclosure of documents or the decision making process for lay and expert advice. This was led by the Legal team.

182. It was not within my responsibilities to keep the Board or Government informed of any of the above matters.

183. My understanding was that ultimately the POL Board – or the sub-Board if they had delegated authority to do so – took all of the strategic decisions in

relation to the group litigation. I recall that Womble Bond Dickinson would often product an 'Option Report' with a recommendation when required, off the back of conversations with POL lawyers. I cannot recall any time when POL Board did not go with the recommendation.

184. I do not know and therefore cannot comment on how POL satisfied itself that the substantive position it took in letters and Court documents were correct. However, on a personal level both for the legal arguments and the technical position, I took at face value the advice and technical explanations as provided by the Legal team, Fujitsu and Deloitte. I had no reason to doubt what experts in this field were telling me.

185. Whilst the draft/proposed letter of response was shared with the PLSG, my involvement in drafting it was limited. This was very much a legally crafted response.

186. My involvement in POL's position on remote access was limited to being briefed on the approved wording/messaging from those with the technical expertise as referenced in the email chain (**POL00025167**) i.e. Rob Houghton, POL's CIO, Fujitsu and Deloitte.

Preparation of the Defence

187. The below deals with my involvement with / oversight of the drafting of POL's Generic Defence and Counterclaim. At the outset, I should say that this

responsibility primarily lay with the Legal team and my involvement was limited.

188. I can confirm that I have reviewed the following:

- a. **POL00024650** (email from Mark Underwood dated 19 May 2017 giving the agenda for PLSG Meeting 24th May 2017); and **POL00024653** (decision paper on counterclaims and recommendation from Bond Dickinson to bring counterclaim for outstanding losses).
- b. **POL00003340** (letter from Bond Dickinson to Freeths dated 18 July 2017 enclosing POL's Generic Defence and Counterclaim).

189. Whilst I cannot recall exactly what happened at the time, the usual approach taken was that each section of the Generic Defence and Counterclaim had input from the respective business owner/subject matter expert and/or verified by them as being accurate. For example, Branch Trading Statements and making good and disputing shortfalls fell within the FSC area of responsibility and so they would verify the section relating to these issues. It was the Legal team that led on the overall drafting and coordination of the document.

190. I have reviewed paragraphs 43(1) to (3) of the Defence (**POL00003340**). At paragraph 4(3) it states "*The blocked value is not (and is not treated as) a debt due to Post Office.*" Whilst I can't remember exactly, the usual approach was that FSC would verify that this was correct.

191. Paragraph 48(3)(b) of the Defence states that it is denied that Fujitsu *“edited or deleted specific items of transaction data”*. As above, I cannot recall having a specific discussion about the Defence, however I believe the approach would have been to seek input from the business expert/subject matter expert and/or have them verify that the wording was accurate. In this instance, the expert was Fujitsu with the oversight/assurance also sought from Rob Houghton, POL’s CIO and Deloitte as referenced in **POL00024801** and **POL00025167**.

192. Paragraph 57(4) of the Defence states *“To have abused those rights so as to alter branch transaction data and conceal that this has happened would be an extraordinarily difficult thing to do, involving complex steps...which would require months of planning and an exceptional level of technical expertise. Post Office has never consented to the use of privilege user rights to alter branch data and, to the best of its information and belief, these rights have never been used for this purpose.”* Whilst I am unable to answer from memory the basis on which POL pleaded this, my understanding is that the same approach would have been adopted in that POL would have requested input/assurance from Fujitsu in the first instance and then possibly requested an assessment from Rob Houghton and/or Deloitte of the statement from Fujitsu.

193. I do not recall from memory why POL decided to bring counterclaims against the SPMs in the group litigation, however having read **POL00024653**, it was

recommended by Womble Bond Dickinson that *“Post Office should bring a Generic Counterclaim for the outstanding shortfalls only.”*

Ongoing management of the litigation

194. I can confirm that I have reviewed the following documents:

- a. **POL00028070** (Bramble draft report dated 3 October 2017). It has not been disclosed whether I received a copy of this report and on reviewing this version, I don't recall ever having read it before.
- b. **POL00139480** (email from Mark Underwood to me and others on 1 November 2017) and **POL00139486** (general update on Deloitte)
- c. **POL00006764** (minutes of the Postmaster Litigation Subcommittee of the POL board on 26 March 2018).

195. Although I was not involved in the oversight of the conduct of the litigation, my understanding is that there were three layers of oversight: the POL Board, the Post Office Litigation Subcommittee and the Post Office Group executive. As described in **POL00006764**, the Post Office Litigation Subcommittee was established to receive advice relating to Postmaster Litigation. However, as I was not involved in any oversight, I am unable to add anything beyond what is contained in the documents.

196. I do not recall receiving a copy of the Bramble report and I do not remember hearing the Deloitte work referred to as 'Bramble'. However, I do remember being aware that Deloitte had been engaged to do some work as set out in

POL00139486. I believe that my knowledge was limited to the noting paper and any associated discussions at the PLSG meetings of which I cannot recall any specific detail.

197. As part of the litigation preparation, I was asked to do a Risk Assessment of the Common Issues, that looked at the likelihood of losing a Common Issue and the impact on Post Office if a Common Issue was decided in favour of the claimants. This risk assessment was done in advance of the Common Issue Trial in November 2018. I also believe I did a risk assessment for the Horizon Issues Trial. Following the Horizon Issue Trial I also led on the contingency planning (Deloitte supported with this) to mitigate the impact of an adverse judgment on the Post Office operation - this was referred to as our 'Response Plan'. I prepared briefings for each of these activities.

Disclosure

198. I can confirm that I have reviewed the following documents:

- a. **POL00003340** (paragraph 50(4) of the Generic Defence and Counterclaim which gives an explanation of Known Error Log (KEL);
- b. **POL00003414** (Freeths' letter to Andrew Parsons dated 13 September 2017. This letter concerns POL's failure to release the Known Error Log to Freeths);
- c. Paragraphs 33 to 41 of **POL00000444** (Andrew Parsons' fourth witness statement). This witness statements details an offer for Freeths IT expert witness to visit Fujitsu to review the Known Error Log;
- d. **POL00003386** (Freeths' letter of 2 October 2018). This refers to disclosure of PEAK system.

- e. **POL00006431** (Noting paper: Update on Litigation Strategy for meeting on 16 October 2017). This refers to Litigation Strategy Paper 11th Sept 2017 which has not been disclosed.
- f. **POL00003363** (Womble Bond Dickinson's letter of 28 November 2018). This letter pushes back on Freeths claims of late disclosure of PEAKs.

199. From memory, my knowledge of the Known Error Log ('KEL') and the PinICL/PEAK database was limited to the extent of that which was shared at the PLSG meetings. I had never heard of them until we got into the Group Litigation Order ('GLO') process. Fujitsu only disclosed ARQ data for the Scheme and so this terminology had never come up before and was not part of what I did on a daily basis. I was cross-examined extensively on them and whilst it might seem remarkable that I had not seen them before, I genuinely had not. I do not feel that I am able to add anything substantive beyond what is contained in the trial transcripts.

200. Although I was in attendance in the PLSG meetings when KELs/PinICLs/PEAK were discussed, my involvement was limited and I had no involvement with disclosure. From my perspective, disclosure was a requirement of the GLO and managed by the Legal team as they had the experience of, and expertise in, disclosure. The discussions that I can recall on disclosure were pretty much 'lawyer to lawyer'.

201. I do not know the basis on which POL pleaded paragraph 50(4) of the Defence. I do not recall any discussions on this, although I presume that Fujitsu provided this information to POL.

Preparation for the Common issues trial

202. My recollection is that decisions on redacting documents were taken by the Legal team.

203. For the preparation of witness evidence, Womble Bond Dickinson worked with witnesses to help them draft their witness statements.

204. I do not recall specifically how the Post Office's case on the effect of the "settle centrally" button was prepared, but as set out above, the general approach adopted when answering specific issues was to seek input from the business area owner/subject matter expert and/or request that they verify the wording for accuracy. In this case, for 'settle centrally' button, this was FSC and so I assume that they were heavily involved.

205. I was not involved in the decision-making for the approach to the cross-examination of claimants. If I recall correctly, this was a Legal team decision with, I expect, the approval of POL Board.

206. I can confirm that I have reviewed the following documents:

- a. The judgment of Fraser J in *Bates & Others v. Post Office Limited* [2017] EWHC 2844 (QB);
- b. **POL00253924** (proof of evidence as at 9 March 2018);
- c. **POL00006674** (proof of evidence dated 25 January 2018);
- d. **POL00024270** (Postmaster Litigation Advisory Board Subcommittee document). This sets out the purpose, membership and ways of working of the subcommittee as at 29th Jan 2018;
- e. **POL00006764** (minutes of the meeting on the Postmaster Litigation Subcommittee of the POL board on 26 March 2018);
- f. **POL00006763** (minutes of the Postmaster Litigation Subcommittee meeting on 10 July 2018);
- g. **POL00167503** (draft witness statement - 23 July 2018 v.1);
- h. **POL00111032** (draft witness statement at 23 2018 July v.2);
- h. **POL00111043** (draft witness statement at 23 2018 July v.3);
- i. **POL00041956** (draft witness statement at 23 July 2018 v.4) and **POL00041955** (covering email);
- j. **POL00111071** (draft witness statement at 23 July 2018 v.5);
- k. **POL00111070** (draft witness statement at 23 July 2018 (v.5));
- l. **POL00041992** (draft witness statement at 23 July 2018 v.6);
- m. **POL00003777** (witness statement signed on 24 August 2018);

- n. **POL00042007**(email from Andrew Parsons to me and others on 5 September 2018). The email is to witnesses for the Common Issues Trial about what to expect in the run up to attending court and advising of witness familiarisation training;
- o. **POL00006757** (minutes of the Postmaster Litigation Subcommittee meeting on 24 September 2018);
- p. **POL00111236** (draft of second witness statement dated 28 September 2018);
- q. **POL00154333** (email from Mark Underwood on 28 September 2018);
- r. The judgment of Fraser J in *Bates & Others v. Post Office Limited* [2018] EWHC 2698 (QB);
- s. **POL00042065** (Jane MacLeod's email to me and others on 16 October 2018);
- t. **POL00111241** (draft of second witness statement with comments at 24 October 2018);
- u. **POL00258255** (email from Mark Underwood to me and others on 18 October 2018). This is an email from Mark to witnesses about logistics for the Common Issues trial and their prep; and **POL00258256** (attachment - background note from Mark for the witnesses);
- v. **POL00154361** (email from Mandy Robertson to me on 1 November 2018). Cover email **POL00154364** which gives a steer from Womble Bond Dickinson on where to focus efforts as a witness on preparing to

give evidence and **POL00154362** (attachment - feedback on how I performed at the witness familiarisation training);

- w. **POL00154364** (email from Dave Panaech to me on 2 November 2018);
- x. **POL00136336** (email from me to Andrew Parsons on 13 November 2018 raising a query on whether losses under £150 will be investigated by POL if disputed by SPM);
- y. **POL00042132** (email from me to Andrew Parsons on 14 November 2018). This is further correspondence around losses under £150.

207. I have been asked to explain the background and purpose to creating a formal subcommittee of the POL Board to deal with the group litigation. I do not recall ever being briefed on the reasoning. I was not a member of this subcommittee.

208. The Terms of Reference for the subcommittee have not been disclosed but **POL00006764** states *“it was noted that at the meeting of the Post Office Limited Board on 29 January 2018, the Board established a committee to receive advice relating to the Postmaster litigation. The Company Secretary tabled draft terms of reference for the Committee which were noted and approved for recommendation to the Board at the next Board meeting on 27 March 2018. It was explained that day-to-day decisions on the litigation were taken by the executive but that the Board was consulted in advance of any significant decisions being taken.”* Similarly, **POL00024270** states “A

subcommittee of the Post Office Limited Board is established to receive legal advice on the Post Office's Defence in the Group Litigation as it proceeds to final resolution." As I was not involved, I do not feel that I am able to expand on anything beyond what is contained in the documents.

209. I do not recall having any discussions with POL senior managers or directors, or representatives of UKGI or government, on litigation strategy following Fraser J's comments on POL's approach in his decision on the application to strike out aspects of the claimant's witness evidence.

210. As a witness, I understood that my role was to assist the Court/judge by providing factual evidence to the best of my knowledge, by way of the witness statement and also through oral evidence. I undertook 'familiarisation training' where it was drummed into us that witnesses could not be coached and that we were there to assist the judge and to go in and tell the truth in the most simple and straightforward way as possible. My understanding of the role did not change throughout the course of the GLO.

211. I was, however, highly criticised by Justice Fraser at the Common Issues trial who stated "*there are two particular matters in which I find that she [me] did not give me frank evidence, and sought to obfuscate matters, and mislead me...*" This was not my intention and I deeply regret inadvertently giving him cause to form that view.

212. As to the process of taking and drafting my witness statement, I remember that I had a meeting with a couple of the Womble Bond Dickinson lawyers and I talked through my roles and experience in POL over the 33 years that I had been with POL. I believe that they asked me questions about a number of points and the meeting lasted several hours. From this discussion, they drafted an initial document that went through several iterations before I signed the final version.

213. As I recall, Melanie Corfield (Communication Team) and Kathryn Alexander (Support Services Resolution at the time, previously Mediation Case Review Manager) kindly helped me by locating the documents that I wanted to read to refresh my memory and to ensure that I had the correct dates and appropriate wording. Melanie Corfield provided the source links for the documents in the footnotes.

214. I have reviewed each paragraph of my Common Issues final statement signed 24 August 2018 and can confirm that, for the most part, this was derived from my own knowledge at the time (although I no longer have this level of knowledge), some of which will have been drawn from documents that I had read over the years. I have referenced some sources in the footnotes within my statement:

- a. My own knowledge: 5-18 inclusive; 20-27 inc; 29-94 inc; 96-105 inc; 112 - 145 inc.

- b. Documents I read: for the ones I've referenced in the footnotes,
Melanie Corfield provided the source links for these for me
- c. Information from others: 28; 95; 106 -111 inc.

215. I do not feel that the lawyers at any point influenced what I said or told me what to say in my witness statement. However, they did guide me on the areas/topics to cover.

216. I do not recall now why paragraphs 139 and 140 of my draft statement (**POL00253924**) were removed and from the documents disclosed to me, there is nothing that gives me any insight into the reason for this. I vaguely remember broad discussions about putting more emphasis on certain things or keeping things more brief but there was no conscious decision from me to put POL in a good light and I cannot recall details beyond a general memory of these sorts of discussions. It was a very long process, which I was doing alongside my day job.

217. As noted above, I was guided by the Legal team as to what areas/topics to include in my witness statement. Beyond this, I cannot recall why I did not describe the detail of the settle centrally button and its consequences in my witness statement.

218. I do not recall considering what was helpful or unhelpful content to POL when I was drafting my statement. POL is a complex organisation and in drafting my witness statement for the Common Issues Trial I was trying to set out POL's

background, the environment it operated in and how it operated on a day to day basis, in a factual (as to what I believed to be correct at the time) and as straightforward way as I could. The Legal team guided me on the areas/topics to cover and I followed their guidance.

219. I was criticised by Justice Fraser in his judgement (*Alan Bates and Others v Post Office Limited* [2019] EQHC 606 (QB)) for having left out certain details, and for having stated at the time that my reasoning for leaving out certain detail was because I thought that the statement was already too lengthy. To be clear, I was not told that the length of my witness statement had to be a certain length but I do recall general discussions about trimming it back and what to keep in and take out. I distinctly recall that when cross-examined, I said that I thought Horizon was “clunky” and I was criticised for not having said this in my statement. I remember being surprised as I thought that I had but when I went back and reviewed my statement, I realised that I had forgotten that this reference was removed in one of the draft amendments. Please see paragraph 115 of draft statement **POL00253924** where I have said *“the biggest weakness in Horizon is that it is a bit “clunky” to use.”* For the avoidance of doubt, it is my view that the Horizon system was clunky. I wholly accept that I signed that statement and only I am responsible for anything that was or was not in that statement. I was guided by legal advice and it was an error to have removed references such as this.

220. The witness familiarisation sessions were designed to give witnesses an insight into the Court process and what to expect on the day. As I remember,

the overriding message from the session was that as a witness, you are there to provide factual, honest information to the judge to assist him in his understanding of how POL operated/operates and the matters to which we were providing witness statements on. Whilst it did not change my approach to my evidence (as our evidence was not discussed in the sessions), it helped me to be better prepared for my Court appearance.

221. As noted above, the areas that I covered in my witness statement were guided by the Legal team. I did not feel pressured by this approach, I found it helpful as I was not experienced in the Court legal process and without their guidance I would not have known what areas to have covered in my statement.

222. The first I heard of the recusal application was when Fraser J returned from recess during the live trial and announced that he had received a recusal application from the Post Office. I remember having to ask my lawyer what recusal meant and finding the whole situation embarrassing.

Horizon issues

223. In preparing for the Horizon issues trial, I can confirm the following:

- a. I had no involvement in the assertion of privilege in redacting documents. This was done by the Legal team.
- b. My involvement in the preparation of witness evidence was only in relation to my own witness statement.

- c. I am not aware of how Post Office's case on bugs, errors and defects and remote access issue was prepared.
- d. Although I can recall discussions between POL (legal team and possibly the IT team) with Fujitsu and Gareth Jenkins, I was not involved in these discussions and so I am unable to answer to what extent they provided assistance in preparing the case.

224. I can confirm that I have reviewed the following documents:

- a. **POL00006442** (decision paper on disclosing PEAKs). This is an options paper from Womble Bond Dickinson to PLSG with a recommendation to do word search for legally privileged information;
- b. **POL00000679** (my witness statement dated 16 November 2018);
- c. **POL00042226** (email from Andrew Parsons to me on 20 January 2019);
- d. **POL00042278** (email from Andrew Parsons to me on 11 February 2019). This email is asking that my team help locate relevant documents in relation to the bugs that Jason Coyne identified;
- e. **POL00111660** (email chain between Katie Simmonds and me on 14 February 2019). This email is regarding Angela Burke and

is also a request from me to amend information in my witness statement earlier than the week before the trial;

- f. **POL00024147** (email from Rodric Williams to Jane MacLeod on 19 February 2019). This email is about a risk assessment and witness familiarisation training;
- g. **POL00006753** (minutes of the meeting of the Group Litigation Subcommittee of the POL Board on 21 February 2019);
- h. **POL00000679** (amended second witness statement at 11 March 2019);
- i. **POL00000688** (corrections to Defendant's witness statements); and **POL00155095** (my email to Ben Foat on 8 July 2019).

Whilst I can't remember the email or the circumstances leading up to it, I was clearly concerned that the Steering Committee was not functioning as originally intended and I wanted there to be transparency with the members about this;

- j. Document **POL00042226** is an email from Andrew Parsons to me on 20 January 2019, where Andy is flagging a risk with the approach that Robert Worden is taking to present his findings/evidence to the judge. I don't recall discussing this email with anyone at the time. While Andy was making us (Rodric Williams and me) aware of the 'off process' approach that Robert Worden was taking, he says in this email that there is nothing POL or the Legal team can do (other than acknowledge the risk) as this is his expert witness evidence.

Whilst I was aware of Robert Worden's work, I had not been involved in it.

225. My role in relation to the training of witnesses for the Horizon issues trial was to act as a conduit between Womble Bond Dickinson (who had arranged the witness familiarisation training with Bond Solomon) and the POL employees who had been identified as witnesses for the GLO trials. Being a witness in a High Court trial was not a routine part of their role and potentially a daunting experience. My role was to oversee the witness familiarisation training, to ensure that the witnesses felt as comfortable and prepared as they could be. Following the experience of the Common Issues and Horizon Trials, I drafted the 'Witness Support Framework' (this document has not been disclosed) setting out my recommended approach for POL to adopt as minimum support for any future witnesses required to give evidence.

226. I do not remember when I was asked to be a witness, however I understand that I was asked because the timeline of the GLO meant that it spanned 20 years. I had been in the Post Office for 33 years by this point and I was the most senior individual who had good operational experience as well as knowledge of the investigations because of the Mediation Scheme. Importantly, POL was approaching the GLO by looking at in-branch transactions and operational evidence and that was where I had the most knowledge. However, Patrick Green KC for 'Alan Bates and Others' approached the case from a 'remote access' and 'bugs' issue for which I did not have the requisite knowledge. I think that there was a genuine blind spot

in POL that Horizon was the issue, which meant that IT were not as involved as I now, with the benefit of hindsight, believe they should have been. Instead this was looked at from an operational point of view.

227. I cannot recall the exact process by which my witness statement was drafted in the Horizon issues trial, but as previously, I was guided by the Legal team as to what areas to include in my statement. Much of the content of this statement was responding to certain claims made by Lead Claimants in their Common Issues witness statements; responding to certain claims by Mr Coyne, the Claimant's IT expert, and responding to Mr Henderson's analysis. For the SPM evidence, the issues raised/claims made were investigated by my team of investigators, with a report produced of their findings. Having reviewed these reports, I then used that content in my witness statement. Having reflected on the types of questions that were put to me during cross-examination, I think that my witness statement tried to cover too many areas as my role as a witness should have been limited to operational matters, with the Chief Information Officer being brought in to speak to technical IT matters.

228. At 208 of Justice Fraser's judgment (Alan Bates and Others v Post Office Limited) [2019] EWHC 3408 (QB), he states the following:

"she [Angela] also explained that in relation to Mrs Burke "I have looked at other evidence in relation to Mrs Burke and what was very clear to me is that Mrs Burke had done absolutely nothing wrong in that situation". This is not at all how Mrs Burke had been cross-examined.

Mrs VDB said that the corrects she had made to her statement had been communicated to the PO solicitor's before the Horizon Issues trial had started. If this is true, I do not see how counsel for the PO would have cross-examined her on the basis of her un-corrected statement."

229. I was deeply upset by this as I had been constantly ringing Jonny Gribben (senior lawyer) prior to the Court case telling him that I needed to change my statement because further evidence had come up that showed what had happened behind the scenes and that Mrs Burke had done a transaction but it had disappeared in branch. In parallel, Fujitsu had picked up on the issue but POL had not been made aware. I knew this weeks before we got to Court and I got in touch with my legal team to tell them this. I was really disappointed that it had not been picked up and I have requested further disclosure from the Inquiry for any correspondence with the legal team around this date. I have expanded on this below in respect of the Inquiry's questions around this point.

230. The Inquiry have asked about why I sought to make changes to my statement after it was signed and served and in particular, why the proposed amendments of paragraph 110 of my second witness statement (**POL00000679**) were not included in the list of amendments (**POL00000688**). I first sought to make changes to my statement in mid-February as can be seen by the correspondence between Womble Bond Dickinson lawyers and myself in **POL00111660**. This is an email chain between Katie Simmons and me on 13 and 14 February 2019. The email is in respect of Angela Burke and

me requesting to amend information in my witness statement more than a week before the trial.

231. **POL00111877** (my amended Second Witness Statement, disclosed by the Inquiry 7 March 2024) shows tracked changes to paragraph 110 that were not reflected in the list of amendments (**POL00000688**). I don't know why that was the case as the other changes (with the exception of a minor change to add c .before £9000 at para 127) tracked in this version of my statement have been included in the list of amendments.

232. The Inquiry have asked me to explain the background and purpose of my email at **POL00155095**. I am unable to answer this question fully as I cannot recall from memory and have asked for further disclosure in respect of this question but not received any. At the time, I obviously felt strongly enough about this issue to put it in an email to Ben. I seem to recall that other Group members were mentioning to me that they felt the PLSG was not operating as it had been previously in that it seemed that decisions were being taken by Board/Board sub-group without any input from them and therefore they were concerned about the potential impact of those decisions on their areas. I think this is what prompted my email to Ben.

LEAVING POL

233. With the settlement being reached on the GLO in December 2019, my role came to an end. As a result, I was made redundant.

GENERAL

234. Based on my knowledge at the time, my view is that POL responded appropriately by appointing Second Sight, setting up the Scheme and making every effort to fully investigate the issues put forward by SPMs.

235. However, having seen what has come out of the Inquiry and having had the opportunity to take a step back and evaluate things with the benefit of hindsight, my biggest regret is that we did not get an external IT expert, such as Deloitte (or another appropriately qualified organisation), to do a deep dive into the Horizon system to assess whether what the claimants were claiming was possible and if so, whether there was any evidence of their claims happening. The idea that Fujitsu could be going into branch accounts, altering figures and generating losses in those accounts seemed so fictitious that I do not think anyone in POL properly contemplated it as a possibility. I think this is why POL approached the cases from an operational and not a technical point of view.

236. In my view, Fujitsu were being insufficiently transparent about the bugs in the system meaning that even people of my seniority were not aware of the full extent of them. Whilst making recommendations to POL during 2018/2019 I suggested that POL established a portal for SPMs to access so that they could see the characteristics of known bugs. Should a discrepancy arise, they would be able to go to the portal to see whether the problem at their branch was likely to have been caused by a bug. I wanted a more open way of

working to help SPMs identify and address the cause of any losses they may have.

237. I felt that the intentions of those I worked with were genuine and they wanted to get under the skin of whether there was any substance to these claims, including myself. However, on reflection I do think that at some point during the GLO preparation/trials there became less emphasis on addressing SPM's issues, by making improvements to policies, procedures and ways of workings, and the focus from a legal perspective, shifted to a more defensive approach. I do not think that my approach changed throughout (and if it did that wasn't my intention) as I continued to use the process to identify issues and make recommendations to the business on policy and process improvements. I recall presenting a slide deck at a senior meeting (I can't remember the forum but General Executive members were in the room) on my reflections on the GLO and subsequent recommendations quite soon after the Common Issues trial (probably in December 2018).

238. In respect of POL's approach to prosecutions, I do not feel able to comment as I had no experience in this area and a limited knowledge of what was involved. However, I was assured by the business that the strict process they followed adhered with the Crown Code of Prosecutors. Similarly, I do not feel able to comment on POL's conduct of the GLO proceedings as I was not involved in the decisions on how POL should engage in the process. I believed at the time that the process being followed by the lawyers was the norm and in keeping with how those processes typically worked.

239. Although the Inquiry has not asked me to review Human Impact Statements, I felt it important to respond to two where I am referenced.

240. In respect of the Human Impact Statement of Jennifer O'Dell:

- a. Page 26 line 16: ...*"she became extremely intimidating, extremely bullying towards me, demanding that I...I sign a piece of paper that I had stolen the money and if I didn't they were going to take my home away"*

241. I suggest that Mrs O'Dell is mistaken in her recollection. I have never, and would never, behave in such a way. This was a mediation meeting and there were five of us in the room - Mrs O'Dell and her representative from Howe & Co, POL's legal representative, the independent mediator from CEDR and myself. If I had behaved as Mrs O'Dell claims and said what she said I did (all of which I strongly deny) the other parties in the room would have said something and/or challenged such behaviour. They did not, as what Mrs O'Dell alleges did not happen.

242. In respect of Chirag Sidhpura oral evidence 17th March 2022, page 43, line 13

"Angela Van Den Bogerd was appointed to conduct an independent review of my case but because the trend was already set by Paul

*Southin, she could not go back and change that, even if she wanted to,
as this was months before the GLO was to start"*

243. I did conduct an independent review of Mr Sidhpura's case and initiated a fresh investigation into the issues that led to his suspension and contract termination. However, on the findings of that investigation and the content of his interview with me, the evidence was such that I was unable to reinstate Mr Sidhpura. My decision was based on the facts of my review, the pending GLO had no bearing on my decision. I have previously reinstated other SPMs where that decision was justified.

244. There are no further matters that I consider are of relevance to the Inquiry that I would like to draw to the attention of the Chair.

STATEMENT OF TRUTH

I believe the content of this statement to be true.

Signed: **GRO**

Dated: 20th March 2024

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No	URN	Document Description	Control Number
1.	POL00178199	Email from Clive Burton to Angela Van-Den-Bogerd RE: Mrs Keri Ann Pugh Former Subpostmistress Chirbury Post office - FAD Code - 296/641	POL-BSFF-0016262
2.	POL00041564	Bankruptcy, prosecution and disrupted livelihoods - Postmasters tell their story; reported by Rebecca Thomson - Article	POL-0038046
3.	POL00026572	Horizon – Response to Challenges Regarding Systems Integrity	POL-0023213
4.	POL00088956	Email thread between John Breeden, Angela Van-Den-Bogerd and others, re: Follow up to BIS meeting on JFSA	POL-0080917
5.	POL00088957	Email from John Breeden to Angela Van-Den-Bogerd cc: Sue Huggins, Tracy Marshall and Lin Norbury RE: Horizon Integrity final report	POL-0080918
6.	POL00294728	Email from Tracy Marshall to Kevin Gilliland, Angela Van-Den-Bogerd cc'd Helen Rose re: Horizon system issues	POL-BSFF-0132778
7.	POL00178200	Email from Emlyn Hughes to Clive Burton, Denise Sparkes RE: Mrs Keri Ann Pugh Former Subpostmistress churbury Post Office - FAD Code - 296/641 – 22 March 2004 at 11:14	POL-BSFF-0016263
8.	POL00178201	Email from Emlyn Hughes to Clive Burton RE: Mrs Keri Ann Pugh Former Subpostmistress - 22 March 2004 at 11:50	POL-BSFF-0016264
9.	POL00178208	Email from Emlyn Hughes to Clive Burton RE: Mrs Keri Ann Pugh - Former Subpostmistress chirbury Post Office - FAD COde 296/641 – 24 March 2004 at 15:21	POL-BSFF-0016271
10.	POL00178211	Email from Emlyn Hughes to Clive Burton RE: MRS KERI ANN PUGH FORMER SUBPOSTMISTRESS CHIRBURY POST OFFICE - FAD CODE: 296/641 – 27 March 2004 at 11:27	POL-BSFF-0016274
11.	POL00178219	Email from Clive Burton to Jim Cruise re: MRS KERI ANN PUGH FORMER SUBPOSTMISTRESS CHIRBURY POST	POL-BSFF-0016282

		OFFICE - FAD CODE: 296/641 – 8 April 2004 at 12:59	
12.	POL00178223	Email from Clive Burton to Jill Camplejohn and Emlyn Hughes re Re: MRS KERI ANN PUGH FORMER SUBPOSTMISTRESS CHIRBURY POST OFFICE - FAD CODE: 296/641 – 8 April 2004 at 13:27	POL-BSFF-0016286
13.	POL00178221	Email from Clive Burton to Jill Camplejohn and Emlyn Hughes re Re: MRS KERI ANN PUGH FORMER SUBPOSTMISTRESS CHIRBURY POST OFFICE - FAD CODE: 296/641 – 8 April 2004 at 13:08	POL-BSFF-0016284
14.	POL00178225	Email from Emlyn Hughes to Andrew Walsh, Clive Burton, Denise Sparkes RE: Mrs Keri Ann Pugh former subpostmistresss Chirbury Post Office - FAD Code: 296/641 – 8 April 2004 at 13:34	POL-BSFF-0016288
15.	POL00099063	Signed Interim Report into alleged problems with the Horizon system	POL-0098646
16.	POL00027722	Post Office Pack for meeting with James Arbuthnot and other MPs Meeting scheduled for 18th June 2012, 6pm, Portcullis House	POL-0024363
17.	POL00148075	POST OFFICE LTD, PROJECT SPARROW SUB-COMMITTEE re: Minutes of a meeting of the Project Sparrow Sub-Committee of the Boardheld at 148 Old Street, London EC1V 9HQ on Wednesday 9 April 2014	POL-BSFF-0007198
18.	POL00004439	Initial Complaint Review and Mediation Scheme - Briefing Report - Part One - Prepared by Second Sight	VIS00005507
19.	POL00091394	Email from Melanie Corfield to Belinda Crowe, Rodric Williams, Angela Van-Den-Bogerd; re: M053 Revised Draft CRR	POL-0090416
20.	POL00022382	POL's draft response to Second Sight's Thematic Issues Report	POL-0018861
21.	UKGI00000018	POL response to Second Sight briefing report - Part Two as part of the Complaint Review and Mediation Scheme	VIS00000979
22.	POL00231477	Panorama Statement stating Allegations against Miscarriage of Justice, POL's investigation into branch losses, POL's	POL-BSFF-0069540

		Investigation into Horizon, Remote access, Prosecutions led by POL etc.	
23.	POL00091401	Email from Rodric Williams to Angela Van-Den-Bogerd and Alexandra Ward with attachments, re: O'Dell Mediation - Panorama "whistleblower"	POL-0090423
24.	POL00024802	Womble Bond Dickinson Rider: Remote Access (Letter of Claim)	POL-0021281
25.	POL00141432	Post Office Branch Audit Trend Analysis YTD Q1 2012/13 - Prepared by Angel Van Den Bogerd	POL-0142817
26.	POL00294743	Interview Notes - Ferndown branch - in confidence	POL-BSFF-0132793
27.	POL00046944	Letter from Shoosmiths to The Post Office re: Julian Wilson	POL-0043423
28.	POL00176467	Email from Angela Van-Den-Bogerd to John Breeden, Lin Norbury, Sue Richardson and others re: URGENT ACTION REQUIRED: JFSA claims - disclosure and evidence gathering	POL-0171738
29.	POL00294879	Memo from Rod Ismay to Angela Van Den Bogerd and others on 12/10/11 re: JFSA and Shoosmiths / Access Legal - Response to Challenges - Proposed Steering Group and Purpose.	POL-BSFF-0132929
30.	POL00085836	Email from Craig Tuthill to Angela-Van-Den-Bogerd cc: Sue Richardson RE: IN STRICTEST CONFIDENCE - Urgent Request Please	POL-0082894
31.	POL00113791	Email from Susan Crichton to Alice Perkins and Paula Vennells re: TOR for the investigation	POL-0112899
32.	POL00137248	Meeting Agenda for Arbutnot/Letwin attended by Angela Van Den Bogerd, Chris Darvill, Jarnail A Singh, Lesley J Sewell, Rod Ismay, Simon Baker, Susan Crichton etc.	POL-BSFF-0000032
33.	POL00022378	Initial complaint review and mediation scheme report	POL-0018857
34.	POL00186110	Email from Simon Baker to Susan Crichton, Alwen Lyons, Angela Van Den Bogerd and others RE: Horizon investigation monthly project board meetings	POL-BSFF-0024173

35.	POL00296463	Email from Angela Van Den Bogerd to Simon Baker re spot review responses	POL-BSFF-0134513
36.	POL00115919	Post Office Limited - Internal Briefing Note to Paula Vennells: Second Sight review into Horizon -Implications of Interim Report - DRAFT	POL-0116921
37.	POL00065349	Letter from Angela Van Den Bogerd to Ms Lumley re: Julian Wilson	POL-0061828
38.	POL00186111	Powerpoint presentation: Horizon Investigation Governance.	POL-BSFF-0024174
39.	FUJ00086811	Horizon data, Lepton SPSO 191320, Draft Report by Helen Rose	POINQ0092982F
40.	POL00144296	Email from Helen Rose to Angela Van-Den-Bogerd and cc'ing Elaine Spencer re: Lepton - ARQ logs from Fujitsu for Lepton	POL-BSFF-0003440
41.	POL00134139	Email chain from Helen Rose to Angela Van-Den-Bogerd, Elaine Spencer re: Lepton logs	POL-0138592
42.	FUJ00229801	Email chain from Penny Thomas to Gareth Jenkins re: transaction log - Fujitsu transaction log for Lepton 191320 for 4th October 2012 to 25th October 2012	POINQ0235955F
43.	POL00298004	Update on the work programme arising from the Horizon Report	POL-BSFF-0136054
44.	POL00190036	Email from Simon Baker to Alwen Lyons cc: Lesley Sewell, Susan Crichton and others RE: Summary of two incidents	POL-BSFF-0028099
45.	POL00190037	Summary of 2 Anomalies. The 62 Branch Anomaly and the 14 Branch Anomaly	POL-BSFF-0028100
46.	POL00116057	Email from Lesley J Sewell to Susan Crichton, Alwen Lyons, Angela Van-Den-Bogerd and others re: FW: Actions	POL-0117059
47.	POL00089711	Branch Support Programme – Terms of Reference v.2	POL-0086686
48.	POL00137327	Email from Susan Crichton to Angela Van-Den-Bogerd and Alwen Lyons cc Simon Baker re Terms of reference for the appointment of Brian Altman QC	POL-BSFF-0000093
49.	POL00193074	Email from Simon Baker To: Susan Crichton, Chris M Day, Andy Holt and others re	POL-BSFF-0031137

		PRINTED: slide pack for tomorrow's weekly Steering Group	
50.	POL00137343	Sub-Postmaster Improvements & Mediations - Weekly Steering Group - 1 August 2013	POL-BSFF-0000101
51.	POL00027664	Post Office Branch User Forum (The Forum). Terms of Reference - Draft	POL-0024305
52.	POL00105634	'Meeting with MPs - Mediation Scheme and Branch Improvement Programme' Minutes, undated.	POL-0104622
53.	POL00043640	Working Group for the Initial Complaint Review and Mediation Scheme, Key points and actions from teleconference on 17 October 2013	POL-0040143
54.	POL00026625	Working Group for the Initial Complaint Review and Mediation Scheme - Key Points and Actions from Meeting 11am 25 October 2013	POL-0023266
55.	POL00043622	Working Group for the Initial Complaint Review and Mediation Scheme - Key Points and Actions from conference call - Working Group applications to be accepted onto Scheme	POL-0040125
56.	POL00043635	Working Group for the Initial Complaint Review and Mediation Scheme, Agenda for meeting at 11:30am on 22 November 2013 @ Bond Dickinson, London	POL-0040138
57.	POL00043624	Working Group for the Initial Complaint Review and Mediation Scheme - Key points and actions from the conference call at 1pm on 28 November 2013	POL-0040127
58.	POL00027505	Initial Complaint Review and Mediation Scheme - [Draft] Settlement Policy	POL-0024146
59.	POL00043625	Working Group for the Initial Complaint Review and Mediation Scheme Key points and actions from the conference call at 1pm on 5 December 2013	POL-0040128
60.	POL00026634	Key points and actions of the "Working Group for the Initial Complaint Review and Case Mediation Scheme" from 19/12/2013	POL-0023275
61.	POL00026638	"Working Group for the Initial Complaint Review and Case Mediation Scheme" Amended Minutes of 03/01/2014	POL-0023279

62.	POL00026682	Working Group for the Initial Complaint Review and Case Mediation Scheme - Key points and actions from the conference call at 1pm on 9th January 2014	POL-0023323
63.	POL00026639	"Working Group for the Initial Complaint Review and Case Mediation Scheme Standing Agenda" for 16/01/2014	POL-0023280
64.	POL00026640	Meeting Minutes for Working Group for the Initial Complaint Review and Case Mediation Scheme	POL-0023281
65.	POL00026641	Initial Complaint Review and Mediation Scheme - Working Group - Minutes - 30 January 2014	POL-0023282
66.	POL00026635	Working Group for the Initial Complaint Review and Case Mediation Scheme Standing Agenda for Thursday Calls	POL-0023276
67.	POL00138101	Initial Complaints Review and Case Mediation Scheme Programme Board	POL-BSFF-0000337
68.	POL00043626	'Working Group for the Initial Complaint Review and Case Mediation Scheme'	POL-0040129
69.	POL00026637	"Working Group for the Initial Complaint Review and Case Mediation Scheme Standing Agenda" for 27/02/2014	POL-0023278
70.	POL00026656	Face to face meeting of the working group - Initial complaint review and mediation scheme- 7 March 2014	POL-0023297
71.	POL00026644	Working Group for the Initial Complaint Review and Case Mediation Scheme - Minutes for 27/03/2014	POL-0023285
72.	POL00026633	Initial Complaint and Mediation Scheme Working Group Minutes of 01/04/2014	POL-0023274
73.	POL00026642	Working Group for the Initial Complaint Review and Case Mediation Scheme Standing Agenda	POL-0023283
74.	POL00138282	Initial Complaints Review & Case Mediation Scheme Programme Board	POL-BSFF-0000508
75.	POL00303871	Email from Angela Van-Den-Bogerd to Kathryn Alexander and Shirley Hailstones re: FW: WG minutes - 17th April	POL-BSFF-0141921
76.	POL00061368	Email chain from Andrew Parsons to Jarnail Singh; Angela Van-Den-Bogerd; Rodric	POL-0057847

		Williams and others, re: Officer's Report and case M054 (Susan Rudkin)	
77.	POL00169322	Email from Jarnail Singh to various RE: Officer's report [BD-4A.FID20472253] on 23 April 2014 at 12:16	POL-0167464
78.	POL00043627	Initial Complaint Review and Mediation Scheme Working Group - Minute of meeting dated 6 May 2014	POL-0040130
79.	POL00304439	Email from Angela Van-Den-Bogerd to Kathryn Alexander re: FW: URGENT - Request for Information Please	POL-BSFF-0142489
80.	POL00117650	Email from Andrew Winn to Alan Lusher re: Rivenhall - Graham Ward SPM suspension	POL-0115233
81.	POL00026657	Working Group for the Initial Complaint Review and Case Mediation Scheme - Minutes of case conference call 15 May 2014	POL-0023298
82.	POL00026659	Minute of Initial Complaint Review and Mediation Scheme - Working Group 20 May 2014	POL-0023300
83.	POL00026668	Working Group for the Initial Complaint Review and Case Mediation Scheme - Working Group Minute - 5th June	POL-0023309
84.	POL00026664	Working Group for the Initial Complaint Review and Case Mediation Scheme Meeting Minutes - 12th June	POL-0023305
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87.	POL00026665	Working Group for the Initial Complaint Review and Case Mediation Scheme - Minute of Working Group Call 26 June 2014	POL-0023306
88.	POL00026672	Minute - Working Group for the Initial Complaint Review and Case Mediation Scheme - 10th July 2014	POL-0023313
89.	POL00026671	Working Group for the Initial Complaint Review and Case Mediation Scheme - Minutes of the Working Group Call 17 July 2014	POL-0023312

90.	POL00026683	Working Group for the Initial Complaint Review and Case Mediation Scheme Meeting Minutes of 24 July 2014	POL-0023324
91.	POL00026674	Minute - Working Group for the Initial Complaint Review and Case Mediation Scheme - 31st July 2014	POL-0023315
92.	POL00029749	Email from Angela Van-Den-Bogerd (POL) to Andrew Parsons, Belinda Crowe, Alexandra Ward, Matthew Harris and Andrew Pheasant re: M025 draft POIR [BD-4A.FID25887007]	POL-0026231
93.	POL00026676	Minute - Working Group for the Initial Complaint Review and Case Mediation Scheme - 28 August 2014	POL-0023317
94.	POL00026679	Working Group for the Initial Complaint Review and Case Mediation Scheme -Meeting Minutes (04/09/14)	POL-0023320
95.	POL00026680	Minutes - Working Group for the Initial Complaint Review and Mediation Scheme - 11 September 2014	POL-0023321
96.	POL00101361	Email from Angela-Van-Den-Bogerd, to Richard Weaver, Mark Davies and others re: The news	POL-0100944
97.	POL00026685	Working Group for the Initial Complaint Review and Case Mediation Scheme Meeting Minutes - 16.09.14	POL-0023326
98.	POL00209634	Email from David Oliver1 to Chris Aujard, Anthony Hooper, CCing Rodric Williams and others re: Post Office Response to Second Sight Part Two Report	POL-BSFF-0047697
99.	POL00209636	Reply by POL to Second Sight's Briefing Report - Part 2 22nd September 2014 - Initial complaint review and Mediation Scheme	POL-BSFF-0047699
100.	POL00043628	Standing Agenda for Thursdays calls - Working Group for the Initial Complaint Review and Case Mediation Scheme (25/09/14)	POL-0040131
101.	POL00026684	Minute - Working Group for the Initial Complaint Review and Case Mediation Scheme - 02 October 2014	POL-0023325
102.	POL00107151	Letter from JFSA (Alan Bates) to Sir Anthony Hooper, RE: Raising concerns about the	POL-0105459

		position and direction of the Initial Case Review & Mediation Scheme	
103.	POL00043630	Meeting Minutes - Working Group for the Initial Complaint Review and Case Mediation Scheme - 14 November 2014	POL-0040133
104.	POL00213728	Agenda for Angela's Team meeting	POL-BSFF-0051791
105.	POL00150195	Email chain from Mark Underwood to Mark R Davies, Angela Van-Den-Bogerd, cc'd Belinda Crowe and others re 141212 - WHD speech (Mediation scheme) mu.doc.	POL-BSFF-0009313
106.	POL00150196	Report on Sub-postmaster Mediation Scheme by James Arbuthnot MP at Westminster Hall Debate Date taken from Metadata	POL-BSFF-0009314
107.	POL00101858	Email Chain from Angela Van-Den-Bogerd to Rodric Williams, Melanie Corfield and Jarnail Singh, RE: comments from the One Show	POL-0101441
108.	POL00109809	Email from Angela-Van-Den-Bogerd to Alwen Lyons RE: One Show	POL-0107797
109.	POL00022296	Notes on meeting held with Second Sight on the 9th of Jan 2015	POL-0018775
110.	POL00043633	Meeting Minutes - Working Group for the Initial Complaint Review and Case Mediation Scheme - 14 January 2015	POL-0040136
111.	POL00219926	Email chain from Belinda Crowe to Andrew Parsons, Tom Wechsler, Angela Van-Den-Bogerd and others RE: Disclosure of prosecution files	POL-BSFF-0057989
112.	POL00022297	Email from Andrew Parsons concerning suspense accounts	POL-0018776
113.	POL00043634	Agenda for the Working Group for the Initial Complaint Review and Case Mediation Scheme - 13 February 2015	POL-0040137
114.	POL00022380	Email from Angela Van Den Bogerd to Mark Underwood, Jane MacLoed, Mark R Davies and others regarding the end of term report and thematic issues rebuttals	POL-0018859
115.	POL00022381	Report on the Post Office investigations and findings	POL-0018860
116.	POL00022383	Not disclosed.	POL-0018862

117.	POL00117183	Email from Angela Van-Den-Bogerd to Mark R Davies, Belinda Crowe, Mark Underwood and others re: RE: Core documents	POL-0118010
118.	POL00117184	Draft Press Statement re Post Office Mediation Scheme Update	POL-0118011
119.	POL00151569	Draft Speaking Note for Angela Van Der Bogerd to Speak to Alan Bates / Kay Linnell	POL-BSFF-0010681
120.	POL00029849	Initial Complaint Review Mediation Scheme: Second Sight Briefing Report - Part Two	POL-0026331
121.	POL00228264	Letter from J Withers to Mr Wechsler re M069	POL-BSFF-0066327
122.	POL00168655	Letter from Angela Van Den Bogerd to James Withers re Complaint Review and Mediation Scheme (the Scheme)	POL-0163952
123.	POL00043631	MINUTE, Working Group for the Initial Complaint Review and Case Mediation Scheme, 8th DECEMBER 2014, MATRIX CHAMBERS	POL-0040134
124.	POL00026652	Working Group for the Initial Complaint Review and Case Mediation Scheme minute dated 17/04/2014	POL-0023293
125.	POL00027454	Post Office Board Report updated 20 February 2014	POL-0024095
126.	POL00002194	Post Office Business Support Programme Terms of Reference – 7 August 2013	VIS00003208
127.	POL00148920	Post Office Business Support Programme Terms of Reference – 04.02.2014	POL-BSFF-0008040
128.	POL00196510	Post Office Business Support Programme Terms of Reference – 18.10.2013	POL-BSFF-0034573
129.	POL00294615	Post Office report for Branch Support Programme - Branch User Forum Meeting 17th July 2014 - Angela Van Den Bogerd	POL-BSFF-0161774
130.	POL00027757	Email from Kevin Gilliland to Paula Vennells, Mark R Davies, Alwen Lyons and others RE: Mr Griffiths	POL-0024398
131.	POL00306234	Email from Lauren Griffins to Angela Van-Den-Bogerd CC ing regina.griffiths. RE: Hope Farm Road Post Office	POL-BSFF-0144284
132.	POL00116698	Email from Angela Van-Den-Bogerd to various RE: Confidential and Legally Prviliged – Hope	POL-0114601

		Farm Road Post Office at 16:13 on 5 September 2014	
133.	POL00306171	Email from Angela Van-Den-Bogerd to Parsons, Andrew, Belinda Crowe CC ing Rodric Williams. RE: Griffiths letter [BD-4A.FID25887477]	POL-BSFF-0144221
134.	POL00306172	Letter from Angela Van Den Bogerd to Gina (Post office Network Transformation)	POL-BSFF-0144222
135.	POL00219796	Email from Rodric Williams to Angela Van-Den-Bogerd, Belinda Crowe. RE: M086 (Griffiths/Hope Farm Road) - draft Settlement Agreement - URGENT	POL-BSFF-0057859
136.	POL00116957	Email to Tom Wechsler from Angela Van Den Bogerd Re: Sub Post Masters - draft attached for comment asap please	POL-0117805
137.	POL00101966	Email from Angela Van-Den-Bogerd to Tom Wechsler re: Sub post masters - draft attached for comment asap.	POL-0101549
138.	POL00116960	Letter from Angela Van Den Bogerd to Mr David Hill re: Radio 4 reports about Horizon system	POL-0117808
139.	POL00102078	Email chain from David Hill to Angela Van Den Bogerd; Re: Letter from Post Office	POL-0101661
140.	POL00319590	Email conversation between Melanie Corfield and Mark Underwood1 Re: BBC Panorama and the Post Office. CC-Karen Lumley, Julian Wilson, Alan Bates, Andrew Bridgen, Cameron d.	POL-BSFF-0157640
141.	POL00089010	Briefing for Angela Van Den Bogerd re: Panorama	POL-0080971
142.	POL00140211	Bond Dickinson Panorama Meeting - Tuesday 9 June	POL-0141387
143.	POL00152161	Email thread from Mark Davies to Kevin Gilliland, Roger W Gale, Michael Larkin and others RE: Panorama	POL-BSFF-0011273
144.	POL00317725	Email from Mark Davies RE: 9.30am: Panorama conf call - Unsubstantiated allegations about Horizon – important update	POL-BSFF-0155775

145.	POL00317780	Email from Melanie Corfield to Angela Van-Den-Bogerd re: Panorama related interview tomorrow	POL-BSFF-0155830
146.	POL00317781	Email response by Mark on the issues highlighted in the second sight report, review of criminal cases, Issue log with Horizon etc.	POL-BSFF-0155831
147.	POL00317782	Draft Statement for Panorama- Prosecutions, Remote access and Individual cases led by POL	POL-BSFF-0155832
148.	POL00152439	Email from Communications Team to Communications Team and bcc'd Adam France, Adnan Killedar and others re: in the loop - a message from Mark Davies	POL-BSFF-0011551
149.	POL00318510	Email from Patrick Bourke to Jane MacLeod RE: BBC Panorama programme - August 10	POL-BSFF-0156560
150.	POL00318511	Email Conversation between Matt and Mark regarding the Post office programme to broadcast the following interviewees like Jo Hamilton, Seema Misra, Noel Thomas, James Arbuthnot, Charles McLachlan, Ian Henderson, Professor Mark Button, Former Fujitsu employee etc.	POL-BSFF-0156561
151.	POL00168291	Email from Mark R Davies (POL); to Paula Vennells (POL); Alisdair Cameron (POL) & others Re: BBC Panorama and mediation scheme on Project Sparrow	POL-0163588
152.	POL00231476	Email from Mark R Davies to Angela Van-Den-Bogerd re: Panorama statement August 2015	POL-BSFF-0069539
153.	POL00319556	Email from Mark R Davies to Angela Van Den Bogerd. RE: Letter to BBC - Complaint on Panorama	POL-BSFF-0157606
154.	POL00319557	Letter by CMS Cameron McKenna LLP to BBC Programme Legal advice and BBC Complaints Board Re:Allegations made by POL, Contributions from misleading experts, Involvement of CCRC, BBC's formal complaints procedure scheme.	POL-BSFF-0157607
155.	POL00029912	Email from Mark Underwood to Angela Van-Den-Bogerd Lorraine Lynch and Alexandra	POL-0026394

		Ward cc Steve Allchorn and others Re: Transcript of Panorama	
156.	POL00139183	Email from Angela Van-Den-Bogerd to Melanie Corfield, Mark Underwood, Lorraine re Transcript of Panorama	POL-BSFF-0001395
157.	POL00022659	Email from Amy Prime to Mark Underwood, Angela Van-Den-Bogerd, Rob Houghton and others re: Remote Access wording - subject to litigation privilege [BD-4A.FID26859284]	POL-0019138
158.	POL00022665	Bond Dickinson Rider: Remote Access re: Section 5(B) - Response to the factual allegation that Horizon does not record transaction accurately and /or that Post Office has been manipulating Horizon data	POL-0019144
159.	POL00006355	Review on behalf of the Chairman of Post Office Ltd concerning the steps taken in response to various complaints made by sub-postmasters	POL-0017623
160.	POL00153379	Action Points from the Meeting with Chris Knight	POL-BSFF-0012491
161.	POL00153578	Email from Kendra Dickinson to Angela Van Den Bogerd Re: Chairman's Report - Requested Helpline Documentation	POL-BSFF-0012690
162.	POL00153691	Email from Kendra Dickinson to Steve Allchorn, Angela Van Den Bogerd, Mark Underwood ¹ and others Re: Chairmans report, requested helpline documentation	POL-BSFF-0012803
163.	POL00153696	Email chain from Rodric Williams to Jane MacLeod, Mark R Davies also cc'ed -Patrick Bourke, Melanie Corfield, Mark Underwood and others Re: Group Litigation	POL-BSFF-0012808
164.	POL00323294	Email from Mark Underwood to Angela Van-Den-Bogerd, Kendra Dickinson, Kathryn Alexander and others re: Actions from the meetings with Jonathan Swift QC and Christopher Knight	POL-BSFF-0161344
165.	POL00153527	Email from Melanie Corfield to Mark R Davies, Jane MacLeod, Angela Van Den Bogerd and others, Re: CWU and alleged Horizon error	POL-BSFF-0012639

166.	POL00025509	Draft Postmaster Litigation Steering Group Meeting Terms of Reference and Membership	POL-0021988
167.	POL00025507	Email from Rodric Williams to POL employees re Postmaster Litigation Steering Group Meeting on 7 June 2016	POL-0021986
168.	POL00025508	Agenda for Postmaster Litigation Steering Group Meeting on 7 June 2016	POL-0021987
169.	POL00025510	Bates & Others v POL Claim Form, Claim no HQ16X01238	POL-0021989
170.	POL00025511	Letter from Freeths to Rodric Williams (POL Solicitor) re: Bates & Others v Post Office Limited Group Action Letter pursuant to the practice direction on pre-action conduct	POL-0021990
171.	POL00006536	Disclosure of Documents in Litigation	POL-0017841
172.	POL00025513	Postmaster Litigation Steering Group Agent Treatment of Debt Paper	POL-0021992
173.	POL00025514	Draft Postmaster Litigation Steering Group Proposed Rolling Agenda for future meetings	POL-0021993
174.	POL00025515	Womble Bond Dickinson Postmaster Litigation Steering Group Action Work Plan	POL-0021994
175.	POL00167538	Email from Rodric Williams to Thomas P Moran, Angela Van-Den-Bogerd, Patrick Bourke and others RE: Postmaster litigation steering group	POL-0162835
176.	POL00024988	Email from Andrew Parsons to Rodric Williams, Thomas P Moran, Andela Van-Den-Bogerd and others RE: Postmaster Litigation Steering Group - Confidential and Subject to Legal Privilege	POL-0021467
177.	POL00006360	Bond Dickinson's recommendations on issues in the Postmaster Group Action (undated)	POL-0017628
178.	POL00105719	Addendum to Shortfall Analysis: Brief Details - Jennifer O'Dell (Great Staughton branch)	POL-0104831
179.	POL00024801	Email from Andrew Parsons to Thomas P Moran , Rodric Williams, Angela Van-Den-Bogerd and others re: Remote Access wording - subject to litigation privilege [BD-4A.FID26859284] with attachment	POL-0021280
180.	POL00025167	Email from Rodric Williams to Andrew Parsons, Mark R Davies, Angela Van Den Bogerd and	POL-0021646

		others RE: Remote access wording - subject to litigation privilege [BD-4A.FID26859284]	
181.	POL00041259	Email from Andrew Parsons to Jane MacLeod and others, re Letter of Response (Final Form)	POL-0037741
182.	POL00041260	Draft Letter of Response to Freeths LLP from Bond Dickinson LLP re Bates & Others v Post Office Limited	POL-0037742
183.	POL00024650	Email from Mark Underwood, Jane MacLeod, Angela Van-Den-Bogerd, and others re: PLSG meeting on Wednesday 24 May 2017 @15:00pm in Tonbridge (1.11)	POL-0021129
184.	POL00003340	Letter from Andrew Parsons to James Hartley, re: Bates & Others -v- Post Office Limited - Generic Defence and Counterclaim	VIS00004354
185.	POL00024653	Post Office Group Litigation Steering Group Meeting decision document: Should Post Office bring counterclaims against the Claimant?	POL-0021132
186.	POL00028070	Deloitte's 'Bramble' Draft Report	POL-0023073
187.	POL00139480	Email from Mark Underwood to Jane MacLeod, Angela Van-Den-Bogerd, and others re: PLSG meeting on Wednesday 24 May 2017 @12 in Tonbridge (1.11)	POL-BSFF-0001611
188.	POL00139486	Noting paper by Womble Bond Dickinson regarding Deloitte reports	POL-BSFF-0001617
189.	POL00006764	Meeting Minutes of the Postmaster Litigation Subcommittee of POL	POL-0018022
190.	POL00003414	Letter from James Hartley to Andrew Parsons RE: Bates & Others v Post Office Limited - Group Action, Claim Number: HQ16X01238 , Inspection of Known Error Logs	VIS00004428
191.	POL00000444	4th Witness Statement of Andrew Paul Parsons (Womble Bond Dickinson), Solicitor to POL	VIS00001458
192.	POL00003386	Letter from Freeths LLP to Womble Bond Dickinson (UK) LLP, HE POST OFFICE GROUP LITIGATION DEFENDANT'S DISCLOSURE – THE PEAK SYSTEM	VIS00004400
193.	POL00006431	Noting paper - Update on Litigation Strategy	POL-0017736
194.	POL00003363	Letter from Andrew Parsons to James Hartley and Imogen Randall re: Post Office Group Litigation - Horizon Issues Trial: Expert Reports	VIS00004377

195.	POL00253924	In the High Court of Justice Queen's Bench Division of Royal Courts of Justice between Alan Bates & others v/s POL regarding Identity proof of Angela's Middle name	POL-BSFF-0091987
196.	POL00006674	Proof of Evidence of Angela Van Den Bogerd (from interview dated 12 Jan 2018 signed 22 May 18)	POL-0017932
197.	POL00024270	Postmaster Litigation Advisory Board Subcommittee	POL-0020749
198.	POL00006763	Meeting Minutes of the Postmaster Litigation Subcommittee of POL	POL-0018021
199.	POL00167503	Angela Margaret Van Den Bogerd's draft Witness Statement in Alan Bates and others v POL (unsigned)	POL-0162800
200.	POL00111032	Alan Bates and Others and Post Office Limited, draft witness statement of Angela Margret Van Den Bogerd	POL-0108638
201.	POL00111043	Alan Bates and others and Post Office Limited, draft witness statement of Angela Van Den Bogerd	POL-0108649
202.	POL00041956	Witness Statement of Angela Margaret van den Bogerd in PO Group Litigation	POL-0038438
203.	POL00041955	Email from Angela van den Bogerd to Andrew Parsons and others re Witness Statement in PO Group Litigation	POL-0038437
204.	POL00111071	Alan Bates and Others v Post Office Limited - Draft witness statement of Angela Van Den Bogerd	POL-0108677
205.	POL00111070	Alan Bates and Others and Post Office Limited, draft witness statement of Angela Margaret Van Den Bogerd	POL-0108676
206.	POL00041992	Witness Statement of Angela Margaret Van Den Bogerd	POL-0038474
207.	POL00003777	The Post Office Group Litigation - First Witness Statement of Angela Margaret Van Den Bogerd	VIS00004791
208.	POL00042007	Email from Andrew Parsons to Sarah Rimmer, Helen Dickinson, David Longbottom and Others re Post Office Group Litigation Trial - Privileged	POL-0038489
209.	POL00006757	Meeting Minutes of the Postmaster Litigation Subcommittee of POL	POL-0018015

210.	POL00111236	Alan Bates & Others and Post Office Limited, draft witness statement of Angela Margaret Van Den Bogerd	POL-0108837
211.	POL00154333	Email from Mark Underwood1 to Jane MacLeod, Julie Thompson, Mark Raymond and others Re: Postmaster Group Litigation - support from members of your team during october and november	POL-BSFF-0013432
212.	POL00042065	Email from Jane MacLeod to Angela Van Den Bogerd and others re PO Group Litigation	POL-0038547
213.	POL00111241	Draft witness statement of Angela Margaret Van Den Bogerd - re Alan Bates & Others v Post Office Limited	POL-0108842
214.	POL00258255	Email conversation between Mark Underwood and Sarah Rimmer, Michael Haworth, Michael Shields, Mike Webb, Pal F Williams, Brian Trotter, Helen Dickinson, LongBottom, John Breeden, Andrew Carpenter, Nick Beal, Tim Dance, Angela Van Den Bogerd, Elaine Ridge RE: Postmaster Litigation Trial - Feedback from Training & Logistical Information: Private & Confidential - Subject to Legal Privilege. Confidential	POL-BSFF-0096318
215.	POL00258256	Report on Common Issues Trial Briefing for POL witnesses regarding background to the litigation and Key issues at trial in November	POL-BSFF-0096319
216.	POL00154361	Email from Mandy Robertson to Angela Van Den Bogerd, cc'ing Mark Underwood and Dave Panaech re: Group Action, Bond Solomon witness familiarisation feedback	POL-BSFF-0013460
217.	POL00154364	Email chain from Dave Panaech to Angela Van-Den-Bogerd cc Beth Hooper re Group Action: steps post witness familiarisation training [WBDUK-AC.FID26896945]	POL-BSFF-0013463
218.	POL00154362	Assessment Criteria in the Witness Box with handwritten answers - Angela Van Den Bogerd	POL-BSFF-0013461
219.	POL00136336	Email from Angela Van-Den Bogerd to Andrew Parsons, Dave Panaech, CC'ing: Rodric Williams and others - Re: Urgent Query Dispute Process 2007-2009 [WBDUK-AC.FID26896945]	POL-0140789

220.	POL00042132	Email chain from Angela Van-Den-Bogerd to Dave Panaech, Andrew Parsons, Amy Prime and others re: Urgent Query Dispute Process 2007-2009	POL-0038614
221.	POL00006442	Steering Group Paper - Peak Disclosure	POL-0017747
222.	POL00000679	Second witness statement of Angela Margaret Van Den Bogerd	VIS00001693
223.	POL00042226	Email from Andrew Parsons to Rodric Williams, Mark Underwood, Katie Simmonds and others re: Supplemental expert report - privileged [WBDUK-AC.FID27032497]	POL-0038708
224.	POL00042278	Email from Andrew Parsons to Angela Van-Den-Bogerd, Jonathan Gribben, Katie Simmonds and others re: 22 Bugs [WBDUK-AC.FID27032497]	POL-0038760
225.	POL00111660	Email from Angela Van-Den-Bogerd to Katie Simmonds re. Angela Burke	POL-0109237
226.	POL00024147	Email chain between Rodric Williams, Jane MacLeod, Andrew Parsons and others Re: Litigation briefing	POL-0020626
227.	POL00006753	Meeting Minutes of the Group Litigation Subcommittee of POL	POL-0018011
228.	POL00000688	Alan Bates & others and Post Office Limited Corrections to Defendant's Witness Statements	VIS00001702
229.	POL00155095	Email from Angela Van-Den-Bogerd to Ben Foat re: Legally Privileged - Postmaster Litigation Steering Group Meeting	POL-BSFF-0014192
230.	POL00111877	Amended Second Witness Statement of Angela Van-Den-Bogerd	POL-0109448