

**WITNESS NAME: BELINDA JANE CORTES-MARTIN**

**STATEMENT NO: WITN09910100**

**DATED: 08 APRIL 2024**

**POST OFFICE HORIZON IT INQUIRY**

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**FIRST WITNESS STATEMENT OF BELINDA JANE CORTES-MARTIN**

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I, Belinda Jane Cortes-Martin (previously Crowe), will say as follows –

1. I have made this statement to assist the Post Office Horizon Inquiry (the “Inquiry”) with the questions set out in the Rule 9 Request addressed to me, dated 23 February 2024 (the “Request”). The Request contains 62 questions, which I have endeavoured to address fully within this statement.
2. I would like to make the Inquiry aware that I have received legal support from Ashfords LLP to prepare this Statement.

## **Background**

3. I would like to make the Inquiry aware that I retired in March 2015 and no longer have access to my CV. Therefore, in setting out my professional background I am relying solely on my memory.
  
4. I was a Civil Servant for the majority of my working life. I joined the Civil Service in, I believe, 1979 and I left in mid-2011. Over these years I worked in a variety of roles across different Government departments, but for the final 2/3 years I was the Information Director for the Ministry of Justice, dealing generally with matters including data protection, freedom of information and records management.
  
5. After leaving the Civil Service in mid-2011 I set up as an independent consultant, undertaking a range of commissions for a variety of clients. The majority of my consultancy work related to information security, either working independently or as an associate working with other consultancies.
  
6. To the best of my recollection it was early 2012 when I was invited to carry out some work for POL. I was approached by email (followed, I think, with a telephone conversation) in late 2011 by the Chair of POL who told me that POL may be looking to commission an independent consultant with experience in Government to assist POL's work relating to Government proposals to mutualise the Post Office. She had been given my name by a mutual acquaintance as someone who may be interested in such a commission. She explained that as she was the Chair she was not involved in 'hiring' but if I were potentially

interested she would pass on my name to those in POL with responsibility for the project who may (or may not) contact me. I believe it was at some point in early 2012 I was invited to a meeting to discuss the project with Susan Crichton, the then General Counsel, and Alwen Lyons, the then Company Secretary. I recall at the end of the meeting I was invited to submit a proposal for supporting the project. My proposal was accepted and I carried out such work as was required, initially working within POL's Legal group for General Counsel. Later the work moved into Strategy Group. Initially my work on mutualisation was sporadic and I was working a few days a month as and when required, whilst also working on different projects for other clients. However, as the mutualisation agenda progressed, the work with POL took up most of my time.

7. In or around October 2013 I was asked to move and work within POL's Complaint Review and Mediation Scheme (hereinafter referred to as the "Scheme"). I can see from the documents provided to me that this move was announced in an email by POL's then CEO, Paula Vennells, on 8 October 2013 (**POL00116179**). The nature of the work I would be carrying out was set out in her email and I was invited to attend a Project Sparrow steering group meeting. I cannot recall attending this meeting, however, I presume that I did attend. At that stage my role was described in Paula's email as providing secretariat support for the Scheme, among other things, but I note from the minutes of the Project Sparrow Steering Group meeting on 12 November 2013 (**POL00137758**), that Paula announced I was to become "Programme Director for Sparrow" (the Scheme), which I think widened the role.

8. As far as I can recall, between October and December 2013 I completed my outstanding work on mutualisation, and as that ran down I began my work on the Scheme. I accepted a fixed term contract for this new role, to cover the period from 1 Jan 2014 to 31 March 2015. Although I started to move over to my work on the Scheme towards the end of 2013, I only officially became a POL employee from the start of my fixed term contract on 1 Jan 2014.
  
9. I had agreed that a full time contract (as opposed to a day rate commission as an independent consultant) would be appropriate for this role, because I was being asked to commit to it on a full time basis for a fixed period.
  
10. Although my job title was 'Programme Director', it became clear early on that I did not have any strategic responsibility or any final authority to make decisions in relation to the Scheme, and whilst I managed a small team of colleagues carrying out work in relation to the Scheme, I did not supervise or manage any other persons in managerial positions. Myself and my team were very much coordinators (as opposed to decision makers), carrying out the instructions and requirements of the Scheme Working Group (in my capacity as secretariat), the Board, its Sub-Committee, and POL General Counsel.
  
11. I also provided a support function for the new POL General Counsel, Chris Aujard, who was a member of Working Group, in coordinating and assisting him in relation to action points arising from the Working Group, as well as the Board and Sub-Committee. I deal with my involvement in the Scheme and the Working



Group in further detail under the following subheading of this statement - "*Project Sparrow, Second Sight and the Mediation Scheme.*"

12. I left POL to retire when my full time contract ended on 31 March 2015. I had always intended to retire at this time and I have not worked since.

### **The Horizon IT System**

13. I confirm that I have considered the following documents provided to me:

- i. **(POL00041564)** - Computer Weekly article dated 11 May 2009);
- ii. **(POL00026572)** - Ismay Report dated 2 August 2010);
- iii. **(POL00149276)** - email from Melanie Corfield to me on 20 October 2014;
- iv. **(POL00142406)** - email from Mark Underwood to me on 12 November 2014;
- v. **(POL00151216)** - email from Steve Allchorn to me on 16 February 2015) and the attachment at **(POL00151217)**.

14. Before starting my work in POL, I do not believe I had any knowledge of the Horizon IT System. I most likely knew that POL had a counter system, but I did not know how this operated or who the provider of the system was. I think that the first time I really became aware of Horizon was when I started my work on the Scheme.

15. The abbreviation for bugs, errors or defects (“BEDS”) was not a term I was aware of during my time within POL. As far as I recall, the only information I was aware of at the time in relation to possible issues and claims about a potential lack of integrity in the Horizon IT system were the matters raised in the Second Sight interim report, which was published before my involvement in the Scheme. I cannot recall exactly when I read this report, but imagine I would have done so at some point after starting my work on the Scheme. I also became aware of such issues being raised by Justice for Sub-postmasters Alliance (JFSA) and applicants in the Scheme. I was not aware of concerns being raised within POL about BEDs or a lack of integrity in the Horizon IT System.

16. I did not receive any training on the Horizon IT System during my time at POL. I was not required to have any knowledge of the system itself - my involvement in the Scheme did not include either investigating complaints or checking the work of the team in POL that were responsible for investigating the complaints set out in applications to the Scheme. I was also not required to consider or interpret any Horizon data as part of my role.

17. I encountered the term ‘ARQ data’ during my time on the Scheme, but I have no recollection of ever knowing exactly what it was and I would not have needed any in depth knowledge or understanding of it to assist me in my role of managing the Scheme and supporting the Working Group.

18. I have been asked to address the ability of Fujitsu employees to alter transaction data or data in branch accounts without the knowledge or consent of SPMs (known as "remote access"). After starting work on the Scheme I became aware of a case study in the Second Sight interim report - I believe this was 'spot review 5', which related to an allegation by a SPM who visited the Fujitsu offices in Bracknell and believed he had seen live transaction data being altered by employees working in the basement. Having reviewed (**POL00151217**) I now recall this SPM was Mr Michael Rudkin. It is my understanding, as far as I recall, that following the publication of their interim report, Second Sight was provided with a statement from the employee who was with Mr Rudkin during his visit to Bracknell, to the effect that what Mr Rudkin observed during his visit was a test environment and not connected to live data.

19. I do remember Second Sight asking POL for email data from 2008 relating to matters concerning Spot Review 5. Having read (**POL00151217**), and from my recollection from my time working on the Scheme I think that this request was the subject of a number of exchanges between Second Sight and POL, and was discussed in detail in two meetings in 2015. I do not recall the specifics of these meetings, but having now reviewed the documents provided to me, I can see that the full positions of Second Sight and POL on this matter are found in the minutes of those meeting at (**POL00022296**) and (**POL00063428**).

20. The issue of 'remote access' was raised by Second Sight on a number of occasions during my time on the Scheme, but my understanding was that POL considered that the matter had been addressed in its response to Spot Review 5

and, as far as I was aware, POL and Fujitsu maintained the position that transaction data could not be changed remotely without the knowledge of an SPM.

21. I did have a conversation with someone in Fujitsu about 'remote access' in early 2015. I cannot remember who the call was with, but I believe the conversation was prompted by a query raised by the CEO in response to briefing she had been provided with relating to her appearance before the BIS Select Committee in February 2015. I recall being told by the Fujitsu employee that there was a provision to deal with a major incident or emergency whereby a senior person at Fujitsu could access the Horizon IT system to rectify a major problem, however, this provision was subject to rigorous authorisation and audit arrangements and as far as I recall, he told me that to his knowledge this provision had never been used. He explained that POL would be involved if it were to be used, and whilst the function existed, it did not alter the basic proposition that Fujitsu could not remotely alter transaction data without the knowledge of the SPM. I would like to highlight that this may not have been the specific wording used by the Fujitsu employee during the call, but it was wording to this effect.

22. As I did not recall knowing about this provision, I reported back to POL General Counsel. He confirmed that it was normal for every major IT system to have what I believe he referred to as a 'superuser facility'. Again, these may not have been the exact words he used, but it was wording to this effect.

23. I can see from (POL00149276) that a few months prior to my phone call with Fujitsu in early 2015, Melanie Corfield forwarded myself, Patrick Bourke and Tom Wechsler an email from Andrew Parsons (an external lawyer at Bond Dickinson), illustrating the following had been confirmed by Fujitsu – *“The system has been designed to prevent any access, either remote or direct, that would allow individual branch transactions to be altered. Fujitsu has controlled access to the Horizon system for software updates and maintenance purposes. This is of course strictly controlled with security processes in place, but could not, in any event, be used to alter individual branch transactions – there is no facility within the system to do this.”* This would have been my understanding, however, I note that Andrew comments that an issue had been identified relating to injecting transaction data. I do not recall this email. I am unsure if I simply missed it, or whether I believed it was a technical matter that lawyers were ‘getting to the bottom of’ as Andrew states and I would be informed if I was required to take any action, so I did not engage with it further.

24. I recall that, as a result of my conversation with Fujitsu in February 2015, and the fact that the subject of ‘remote access’ continued to crop up regularly, I suggested to my team that it would be worth commissioning a piece of work to look at how the superuser operation in the Horizon IT system worked. My concern was that there seemed to be no common understanding of the term ‘remote access’, so a one size fits all answer may not be appropriate. Rather, a wider and more sophisticated response to the issue of ‘remote access’ was required. Unfortunately, I do not know if such work was ever commissioned after I left POL.

25. I would like to stress that I was never concerned that Fujitsu might be adjusting transaction data without the knowledge of SPMs. My understanding was, throughout my time working on the Scheme, that transaction data could not be altered without the knowledge of the SPM. I believed, from what I had been told, and with my limited technical knowledge, that if any intervention was necessary, for whatever reason, any alteration would have to be seen and accepted by the SPM (e.g. as a transaction correction).

26. I do not recall if I ever read the May 2009 Computer Weekly article at **(POL00041564)**. This was published well before my time in POL, and I do not recall ever being involved in any internal discussions about it. I did become aware that Computer Weekly had written articles about Horizon and I would have read any which were published while I was working on the Scheme.

27. I have no recollection of reading or knowing about the Ismay Report dated 2 August 2010 at **(POL00026572)**. I believe the first time I had heard of this report was during the course of watching other evidence given at the Inquiry. I do not know whether it was ever used in POL's response to any complaints made in applications to the Scheme as I was not involved in the investigation side. It was not my role to consider the investigation reports and I lacked the knowledge and expertise to do so.

**Project Sparrow, Second Sight and the Mediation Scheme**

***Project Sparrow and POL's oversight of the Mediation Scheme***

28. I confirm that I have considered the following documents provided to me:

- i. **(POL00116179)** - email from Paula Vennells to Andy Holt and others, copied to me, on 8 October 2013;
- ii. **(POL00123004)** - my email to Andrew Parsons on 21 October 2013;
- iii. **(POL00099870)** - email exchange between me, Peter Batten and others in October 2013;
- iv. **(POL00137758)** - draft note on actions and decisions from the Project Sparrow Steering Group meeting on 12 November 2013;
- v. **(POL00030694)** - note on Project Sparrow dated 13 November 2013;
- vi. **(POL00146921)** - minutes of the Project Sparrow Steering Board meeting on 25 November, likely 2013);
- vii. **(POL00146934)** - email chain between me, Ruth Barker and others on 28 November 2013;
- viii. **(POL00100003)** - memo from Chris Aujard dated 6 December 2013;
- ix. **(POL00146985)** - email from Andrew Parsons to me on 9 December 2013 and the attachments at **(POL00146986)** and **(POL00146987)**;
- x. **POL00147108** - email from David Oliver to me on 6 January 2014 and the attachments at **(POL00147109)**;

- xi. **(POL00147258)** - email from me to Chris Aujard on 20 January 2014 and the attachment at **(POL00147259)**;
- xii. **(POL00108231)** - briefing note to Alice Perkins and Paula Vennells dated 27 January 2014;
- xiii. **(POL00040074)** - email from Nicky Mal to me and others on 31 January 2014) and the attachments at **(POL00040075)**, **(POL00040076)**, **(POL00040077)** and **(POL00040078)**;
- xiv. **(POL00100200)** - memo from David Oliver to Paula Vennells and copied to me dated 5 February 2014;
- xv. **(POL00116275)** - email from me to Paula Vennells on 17 February 2014) and the attachment at **(POL00116276)**;
- xvi. **(POL00027452)** – my note to the POL board on 20 February 2014;
- xvii. **(POL00100322)** - briefing from me to Paula Vennells on 22 February 2014);
- xviii. **(POL00302500)** - minutes of the meeting of the POL board on 26 February 2014;
- xix. **(POL00138176)** - minutes of the Mediation Scheme Programme Board;
- xx. **(POL00147643)** - email exchange with Jonathan Swil on 9 March 2014) and the attachment at **(POL00147644)**;
- xxi. **(POL00107317)** - Linklaters advice dated 20 March 2014;
- xxii. **(POL00147831)** - email from Rodric Williams to Angela Van Den Bogerd on 25 March 2014;



- xxiii. **(POL00147933)** - email from Carolyn Low to me and others on 2 April 2014) and the attachment at **(POL00147934)**;
- xxiv. **(POL00158128)** - email from David Oliver to Paula Vennells on 3 April 2014) and the attachment at **(POL00158129)**;
- xxv. **(POL00162134)** - email from Chris Aujard to Alice Perkins on 7 April 2014);
- xxvi. **(POL00116439)** - agenda and papers for the Project Sparrow Sub-Committee meeting on 9 April 2014;
- xxvii. **(POL00116444)** - emails between me and Paula Vennells on 9 April 2014);
- xxviii. **(POL00006565)** - minutes of the Project Sparrow Sub-Committee meeting on 9 April 2014;
- xxix. **(POL00138282)** - notes of the Initial Complaints Review & Case Mediation Scheme Programme Board on 11 April 2014;
- xxx. **(POL00148049)** - my email to Angela Van Den Bogerd and others on 14 April 2014;
- xxxi. **(POL00148068)** - my email to Chris Aujard on 15 April 2014;
- xxxii. **(POL00022683)** - letter from Alan Bates to Jo Swinson MP dated 16 April 2014);
- xxxiii. **(POL00148101)** - email from me to Mark Davies and others on 23 April 2014;
- xxxiv. **(POL00100566)** - email from me to Peter Batten on 23 April 2014;

- xxxv. **(POL00100577)** - email from me to Peter Batten on 23 April 2014 and the attachment at **(POL00100578)**;
- xxxvi. **(POL00148108)** - presentation dated 23 April 2014;
- xxxvii. **(UKGI00002255)** - email from me to Peter Batten and others on 24 April 2014 and the attachment at **(UKGI00002256)**;
- xxxviii. **(POL00148173)** - email from me to Chris Aujard on 25 April 2014 and the attachment at **(POL00148174)**;
- xxxix. **(POL00006566)** - minutes of the Project Sparrow Sub-Committee meeting on 30 April 2014;
- xl. **(POL00040153)** - email from David Oliver to me on 1 May 2014) and the attachment at **(POL00040154)**;
- xli. **(POL00116535)** - email exchange with David Oliver and others on 5/6 May 2014;
- xlii. **(POL00108521)** - email exchange concerning the retention of data;
- xliii. **(POL00116562)** - email exchange on 13 May 2014 and the attachment at **(POL00116563)**;
- xliv. **(POL00021426)** - minutes of the Audit, Risk and Compliance Sub-Committee meeting on 15 May 2014;
- xlv. **(POL00021525)** - minutes of the POL board meeting on 21 May 2014;
- xlvi. **(POL00148420)** - email from Alwen Lyons to me on 23 May 2014;

- xlvi. **(POL00148478)** - email from David Oliver to me and others on 29 May 2014 and the attachments at **(POL00148479)**, **(POL00148480)**, **(POL00148481)** and **(POL00148482)**;
- xlvii. **(POL00168040)** - email from David Oliver to me and others on 1 June 2014) and the attachment at **(POL00168041)**;
- xlvi. **(POL00027369)** - paper titled Initial Complaints Review and Mediation Scheme: The way forward dated 3 June 2014;
- i. **(POL00149689)** - email from Stephen Hocking to you and others on 13 June 2014;
- ii. **(POL00006571)** - minutes of the Project Sparrow Sub-Committee meeting on 6 June 2014;
- iii. **(POL00000213)** - terms of engagement dated 1 July 2014;
- iiii. **(POL00021762)** - my email to Charles Colquhoun on 6 August 2014;
- lv. **(POL00022168)** - my email to Chris Aujard and others on 6 August 2014;
- lvi. **(POL00129437)** - record of teleconference on 11 August 2014;
- lvii. **(POL00101175)** my email to Paula Vennells on 15 August 2014;
- lviii. **(POL00021800)** my email to David Oliver and others on 19 August 2014) and the attachment at **(POL00021801)**;
- lix. **(POL00148870)** - my email to Alwen Lyons on 22 August 2014;
- lx. **(POL00027363)** - my note to the POL board dated 17 September 2014);
- lxi. **(POL00116714)** - email from me to Paula Vennells on 25 September 2014;

- lxi. (POL00149392) - email from me to Mark Davies and others on 28 October 2014 and (POL00149393).
- lxii. (POL00149417) - email from Laura Pinkney to Andrew Parsons, copied to me on 29 October 2014;
- lxiii. (POL00150869) - my email to Mark Davies on 23 January 2015);

29. I have been asked to provide an account of my involvement in POL's response to the 'emerging scandal', including the nature and extent of my involvement in Project Sparrow, Second Sight's investigation, the Scheme and the Scheme's Working Group. I would like to stress to the Inquiry that during my time within POL, these matters were not viewed as an 'emerging scandal.' POL's position in relation to Second Sight's interim report was that the report stated that no evidence of systemic problems with the Horizon software had been found and, as far as I understood, POL continued to have confidence that Horizon was working as it should. However, POL noted that improvements could be made in the training and support processes provided to SPMs. In response to the report POL made a number of commitments, one of which was to create the Scheme. Second Sight's original investigation was completed before my involvement with the Scheme and I had understood that after the creation of the Scheme, Second Sight's role changed to one of reviewing the POL investigation reports into the complaints set out in the individual applications to the Scheme.

30. In terms of Project Sparrow, I am not aware of the background to its set up, as this was before my involvement in the Scheme. I do not recall if I was ever told its original remit.

31. Having looked at the documents provided to me with the Request, I now recall that there was a steering group chaired by Paula Vennells, overseeing the work of Project Sparrow. It appears that I attended at least two steering group meetings prior the official start date for my role on the Scheme. The notes of these meetings set out early expectations for the role, although I can see from my review of the documents that the reality over time differed somewhat from the early expectations.

32. To the best of my recollection, and having reviewed the documents, there were two main strands of what was called Project Sparrow which were, until I became involved, led by Angela Van den Bogerd – (1) the Complaint Review and Mediation Scheme and (2) the Business Improvements Programme, which addressed issues arising out of complaints within the Scheme. At the point that I became involved, these two strands were separated and handled separately. I became responsible for the Scheme and Angela continued to lead the Business Improvement Programme.

33. Nevertheless, whilst investigations into complaints contained in Scheme applications technically fell within the Scheme, I was not responsible for the substance of those investigations. Angela was responsible for this work because

of her particular expertise and experience in Horizon and the way the system worked, and she managed the investigation team. My involvement in the investigations was limited to chasing the progress of those investigations, along with progress of Second Sight's reviews of the investigations in order to effectively manage the progress of applications within the Scheme.

34. After this split the term "Project Sparrow" was continued to be used as a shorthand and for the Scheme, however, Project Sparrow effectively just became the Scheme.

35. I have been asked to explain why POL's Board created a formal Sub-Committee to oversee Project Sparrow. I do not know why the Board did this. As far as I can recall, I was simply told it was going to do so and I would not have expected to be consulted on this.

36. In terms of the process by which I was appointed as Programme Director of the Scheme, having now reviewed **(POL00116719)** I assume that I had a conversation with Paula Vennells (or someone on her behalf) prior to being invited to a steering group meeting for Project Sparrow. I do not remember this conversation, or the steering group meeting. Until that point I knew virtually nothing about the work of Second Sight and I do not think I had heard of the Scheme.

37. My primary role was to provide secretariat support for the Chair and the Working Group overseeing the Mediation Scheme and managing the Scheme on a day to day basis in line with the requirements of the Working Group and POL. Although there were less than 150 cases in the Scheme, the whole process of managing cases through the Scheme was manual, and therefore administratively and resource intensive. For example, the movement of cases was tracked using a spreadsheet and every time a case moved to the next stage of the process it had to be recorded manually. I and my team tracked the movement of cases, progress chased if a deadline for a stage to be completed was approaching, sent the necessary documentation to applicants and their advisors in line with the instructions of the Chair and the Working Group, set up payment authorisations and arrangements to check and pay invoices and complete the budgetary requirements set by POL. Once cases completed their investigation and review stages we were responsible for liaising with all relevant parties, including CEDR, to arrange the mediation meetings themselves.

38. We also organised the Working Group meetings and completed the minutes and paperwork for the meetings. I believe these meetings were held weekly as the Scheme progressed in the form of, a full face to face meeting every month to discuss substantive issues and a telecon each week (if required) for case progression and urgent business. If actions required chasing, I would do this and would provide updates to the Working Group as requested. I also supported the Chair of the Working Group by dealing with correspondence relating to the Scheme by preparing draft letters for his consideration either for applicants, advisors or external stakeholders raising questions about the Scheme.

39. I also assisted in making sure that POL completed its action points from the Working Group meetings. To this end I often commissioned and co-ordinated briefings for POL General Counsel to be able to respond to requests for information arising from those meetings.

40. My work as Programme Director of the Scheme also involved gathering and providing information and advice when requested by POL's Board and Sub-Committee for consideration by POL General Counsel before being submitted to the Board.

41. In terms of my involvement with Second Sight, I managed the day to day relationship with them, however, this did not start until after the publication of their 2013 interim report and my involvement in the Scheme. I negotiated resources with them, paid their invoices and was generally their main point of contact within POL for requests for information.

42. To the best of my recollection the scope of my role as Programme Director developed over time. When I signed my full time contract for the role, the General Counsel, as my line manager, was required to agree work objectives with me. I do not have a copy of those objectives and I cannot remember the detail of them but as far as I can recall those objectives were broadly to provide secretariat support for the Scheme and Working Group, manage the day to day relationship with Second Sight and take any necessary actions as required by the Board and



POL in relation to the Scheme. I think the nature or description of the role was an emerging picture and it evolved as the Scheme developed. The Scheme and the role was new and it was left to me and POL General Counsel to develop it in line with the Working Group's and Board's requirements.

43. Within POL I imagine my role would have likely been referred to as Mediation Scheme Programme Director, or secretariat support to the Scheme Working Group. Having reviewed the papers, it may also have been referred to as Project Sparrow Programme Director, however, I would not have called myself this as I do not think the term 'Project Sparrow' was understood by anyone other than Board and ExCo members and a few people closely connected with the work.

44. As mentioned earlier in this statement, in my role I had a small team assisting me with the operation of the Scheme. We were located in POL's Legal group and, as far as I recall, my team comprised 7 people at its largest (although there were several personnel changes throughout the Scheme). My line manager was Chris Aujard (General Counsel to POL and member of the Working Group). I also reported to the Board and its Sub-Committee, through POL's General Counsel, who were overseeing the Scheme. As my role was not permanent and was specific to the Scheme, I do not think it was otherwise part of POL's main or overarching governance structure.

45. With the advice of PA consulting, who came in to assist with the establishment of the Scheme when I started my role, we replaced the CEO chaired steering group

with a Programme Board, chaired by POL General Counsel, to oversee the Scheme from within POL. However, it soon became clear that this was not a 'Programme' in the sense that it was not delivering a major change programme, and although the Programme Board appears to have met a few times in early 2014, it was soon disbanded. The POL Board established a Sub-Committee to oversee the Scheme instead and it appears that a sub group of ExCo was also established. I have no recollection of the ExCo group and do not recall attending any meetings.

46. I kept my work for POL and my work for the Working Group separate and I never felt conflicted in my role as Programme Director for the Scheme and secretariat for the Working Group. For example if the Chair had made a ruling on an application within the Scheme and asked me to send it simultaneously to POL and JFSA to ensure both parties received the information at the same time, I would do that, and at no time did POL expect me to treat it favourably in relation to the Scheme. There were also occasions when Second Sight raised matters with me and I added them to the agenda for the Working Group meeting so that if POL was going to, for example, deny requests for information from Second Sight, it would have to do so on the record and with the knowledge and opinion of the Working Group's Chair. The Inquiry should note that POL was represented by two members on the Working Group, POL General Counsel (Chris Aujard, who was also my line manager) as the senior manager in POL responsible for the Scheme and Angela Van Den Bogerd as the leader of the complaints investigation team. It was for those members, particularly POL General Counsel, that I would commission and co-ordinate briefings from experts within POL so

that they, as members of the Working Group, could respond to requests from the Working Group.

47. I have been asked if I informed members of the Working Group, JFSA or other third parties about my position on 'Project Sparrow.' I am not sure that any project names were referred to outside of POL. The Working Group members knew that I worked for POL and, as far as I am aware, that POL General Counsel was my line manager, but I do not remember whether or how I described my exact role to the Working Group. As far as I recall I always made it clear when speaking to a member of the Working Group if I were speaking for POL (which I sometimes did to pass on messages or information from POL) or as Secretariat to the Working Group.

48. In relation to Second Sight's work on the Scheme I believe that POL's Board was responsible for deciding the ambit of Second Sight's investigation and amending or terminating Second Sight's contract with POL.

49. I believe that Chris Aujard (and later Jane MacLeod) as General Counsel was responsible for deciding the documents or information to be provided to Second Sight.

50. I had no authority to make decisions relating to the matters in paragraphs 48 and 49 above. Rather, I would offer assistance and opinion on such matters if I felt necessary or was asked to do so. I can recall one example of this in relation to

the matter of Second Sight's contract with POL. There was an ongoing debate between Second Sight and POL in that Second Sight believed it had a role beyond the individual applications in the Scheme and POL disagreed. My understanding was that following the publication of the Second Sight interim report of 2013 and the creation of the Scheme, the role of Second Sight changed to a role of reviewing POL's investigations on Scheme applications. This change pre-dated my involvement in the Scheme and I had no input into it. I recall that at some point - I do not recall when - it became clear that Second Sight disagreed with this later definition of its role and there were several attempts to resolve the matter, but I do not think any totally succeeded. I had a number of conversations with Second Sight directors about this and I tried to resolve the issue through suggesting a letter of engagement, which it appeared Second Sight had not had. However, I eventually had to refer this issue to POL General Counsel I was unable to resolve it and it was outside of my level of authority to attempt to force the matter. As stated above, I am not sure that the matter was ever totally resolved.

51. In terms of briefings, I provided these as and when requested or required by the Board (or Sub-Committee), POL General Counsel or other senior managers. I included in briefings any information either requested or which I felt may be relevant. Any technical or legal input for such briefings was obtained from either lawyers, Angela Van Den Bogerd or relevant subject experts within POL, such as IT or Comms. I cannot specifically recall including information regarding BEDS in any briefings as, as far as I am aware, the matter never arose. Had it done so that information would have been provided by either POL Legal, Angela or IT. In

terms of 'remote access', I have dealt with my recollection of passing on information about this in paragraphs 18-25 above. As far as I recall POL's position, or at least my understanding of it, in relation to BEDs (although as stated earlier in this statement, is not an abbreviation I ever recall hearing at the time) and remote access didn't change throughout the period I worked in POL.

52. I liaised with the Shareholder Executive ("ShEx") on routine matters of Parliamentary Questions and correspondence and would also brief ShEx if requested by the Board. ShEx was also represented on the Board and Sub-Committee and therefore as far as I am aware had access to all Board papers on the Scheme. I also very likely provided briefings for POL senior managers if they were meeting Government to discuss the Scheme. As ever, my briefing would have pulled together input from the relevant subject experts within POL. Any technical information relating to Horizon, or any legal information relating to prosecutions that the subject experts provided, would have been inserted into the briefing by me (or someone on my team). The only information included in any briefing that was not either provided by or cleared by a subject expert would be facts and figures relating to the progress of applications in the Scheme. To the best of my recollection I only directly briefed a Minister once – this was Jo Swinson in advance of a Westminster Hall debate. The debate was about the Scheme, so my role in the Scheme meant I was best placed to provide the brief.

53. I do not know if any senior managers and / or directors of POL were concerned about personal liability for malicious prosecution. If it were ever discussed in my presence, I have no recollection of it.

54. From documents provided to me, I can see that the setting up of the Scheme and the Working Group was announced in August 2013. This pre dates my involvement in the Scheme and I was not privy to any discussions about this. The press release announcing the introduction of the Scheme on 26 August 2013 shows that it was established following the publication of Second Sight's report into the Horizon IT system, published in July 2013. The press release said that Second Sight's report stated that so far no evidence of systemic problems with the Horizon software had been found. However, it noted that improvements could be made in the training and support processes provided to SPMs. In response to the report POL made a number of commitments, one of which was to create the Scheme.

55. I can see references to settlement strategies within the documents provided to me, for example (**POL00137758**) shows that a settlement policy was developed to be discussed by ExCo, but I now have no recollection of the policy or any discussions about it. However, once the Scheme was underway and mediations had started, as far as I can recall the general strategy was to resolve and settle a complaint if at all possible, provided the agreed outcome was not unreasonable or totally disproportionate. As far as I can recall, before every mediation there were discussions between lawyers, Angela Van Den Bogerd, the POL mediator and someone from my team to ascertain a broad understanding as to what a possible mediation outcome might be. This was to try to ensure consistency, as the mediator may not have been directly involved in the investigation process for the actual complaint being mediated. However, it was accepted and understood



that the mediator needed to have flexibility to respond on the on the basis of what arose during mediation discussions. In order to ensure POL avoided delaying a mediation meeting because of staff unavailability, it used a number of different personnel as mediators.

56. I have considered the following from my email at 06:43 on 28 November 2013 at **(POL00146934)**: *“On the point about...the system, the fact is that no such problems have been found...the Scheme is not designed to identify such problems, it is to deal with complaints”*. As mentioned above, I do not believe I was aware of the term BEDs at the time, but in any event the Scheme was not set up to investigate potential issues with the Horizon IT System. Rather, the Scheme was designed to give SPMs an opportunity to make a complaint which would be investigated. As mentioned in paragraph 29 of this statement, this was one of the commitments made by POL to improve the support provided to SMPs, following the publication of Second Sight’s interim report.

57. The contents of the email exchange at **(POL00146934)** suggests to me that my understanding of the Scheme’s purpose represents the view held within POL generally, and this had been the view since before I became involved in the Scheme. However, I also understood that POL was of the view that during the course of investigating and reviewing the individual complaints in the Scheme, it was, of course, possible that a systemic problem with Horizon could be identified and that was a matter which would have to be addressed. Nevertheless, the main aim of the Scheme was to address complaints.

58. I have been asked if I at all considered there to be a difference between what POL stated publicly about the Mediation Scheme compared to what was discussed internally. I do not recall thinking that there was a difference, however, I do think that it became clear once the Scheme got underway that POL's view of Second Sight's role and how the Scheme would work differed from others' views, such as JFSA and Second Sight. I cannot account for the reason for this as I was not involved in the initial set-up of the Scheme. I think perhaps a general desire to get the Scheme up and running quickly before thrashing out all the necessary detail prior to the Scheme starting and/or being announced may have been a contributory factor. An example of this would be not having agreed clear terms of engagement with Second Sight and, defining its role in relation to the Scheme from the outset. It also appears to be the case from the various comments set out in **(POL00146939)**, as discussed in the preceding paragraph of that document, that there was a difference of opinion between JFSA and POL about the aim of the Scheme. Having said that, I do not recall feeling that the difference was significant at the time.

59. I am unable to explain the background to Andrew Parsons' suggestion within **(POL00123004)** that *"Work is continuing on managing SS out of the Scheme. In general, SS' role is gradually being reduced until they can be removed entirely. This work has already begun"*. I only became involved in the Scheme in October 2013, shortly before this email from Andrew on 21 October 2013, and I do not recall this email at all. Clearly Second Sight remained involved in the Scheme for



some 18 months after this email by Andrew Parsons (which was the period I was working on the Scheme), but it is clear from the documents I have been asked to review that the work of Second Sight and their continued involvement in the Scheme was a subject discussed regularly by the Board and the Sub-Committee.

60. I do not know the reasons for the above approach in respect of Second Sight's continued involvement in the Scheme. I do recall from early on in my involvement in the Scheme that POL was concerned about impartiality. I believe that this was the impression I came away with when attending my first steering group meeting on Project Sparrow. I also have a very vague recollection from many months before my involvement in the Scheme (perhaps in late 2012 or early 2013) of Susan Crichton asking me whether I had any contacts who were forensic accountants. My recollection (although it may not be entirely accurate as I was not really aware of the Second Sight work at this time) was that POL was concerned about lack of progress by Second Sight, but I do not know whether this concern went beyond Susan Crichton. I think that I may have passed on some contact details, but I do not think this was followed up.

61. From my recollection, I believe that POL wanted to ensure that it could draw a line under the concerns about Horizon at the end of the Scheme, once the applications had all been investigated, mediated (where the parties agreed to mediation) and resolved where possible. I believe the aim of this was to ensure that the role of the Working Group and Second Sight did not continue to become

part of any permanent arrangement for investigating new complaints as they arose.

62. I do recall that the Board (through the Sub-Committee while it existed) were keeping the Scheme under review. I can also see from the documents provided, for example (**POL00137758**), that ExCo were also involved in decisions relating to the Scheme. I do not know if there were any other considerations or discussions by POL senior management about amending the nature of the Scheme or the Working Group.

63. Those people who were involved in discussions relating to any review of the Scheme and strategies around the same would have been Board and Sub-Committee members, ExCo, Angela Van Den Bogerd, lawyers, myself and others in my team who were involved in preparation of options. ShEx was also represented on the Board and the Subcommittee, so they would have been aware of such information. Unfortunately I cannot recall the specific discussions, but I see from minutes of various meetings I have been provided with they focussed upon whether the Scheme was effective in terms of achieving its aims in terms of cost and timeframe expectations. I do not know if there was a difference of views on these issues. I would imagine that any difference that existed between Board or ExCo members would not have been discussed in front of me.

64. I think one of the reasons as to why the Scheme was kept under review was due to the fact that POL had set up the Scheme at considerable cost and before doing so Second Sight had presented findings in its interim report that there was no evidence of systemic problems with Horizon at that stage of the Second Sight investigation. For these reasons it seemed reasonable to me, and indeed good practice, that POL would keep the Scheme under review, to know whether or not it was working as originally intended, and to consider other options if they were not happy with how it was working.

65. I have been asked to describe my recollection of the board meeting on 26 February 2014. Unfortunately I do not have any specific recollection of this meeting and I therefore defer entirely to the minutes of that meeting at (POL00302500). Following a review of the minutes, I can see that whilst I attended that part of the meeting which dealt with the Scheme I did not appear to play an active part in the meeting.

66. I prepared the paper for the meeting (see POL00027452). As far as I can recall, all papers prepared for Board meetings were prepared on behalf of an ExCo member - in my case this would have been POL General Counsel. I believe we would have discussed the potential contents of the report and I would have pulled it together with input from other relevant people for approval before being submitted to the Board. I believe that the Board was presented with a full and accurate picture of (a) the current status of the Mediation Scheme and (b) the future plans for the Mediation Scheme and / or Second Sight during this Board meeting. As is noted in the meeting minutes under the sub heading 'INITIAL

COMPLAINT REVIEW AND MEDIATION SCHEME', the Board seems to have requested a paper setting out the worst case scenario and this is the commission I, and POL General Counsel, appear to have fulfilled.

67. Whilst I have very little recollection of this, I can see from the papers that I had some involvement in commissioning a piece of work by Linklaters, to provide legal advice to the Board in relation to Horizon/the Scheme. I would not have reviewed this advice in any particular detail, so I do not recall having any specific view on it. I imagine the decision to get this advice would have come from a Board discussion and I would have simply been assisting POL General Counsel in obtaining it. I do not recall what actions POL took as a result of such advice.

68. In terms of the documents that POL allowed Second Sight to access, and as far as I can recall, it was my initial understanding that following a discussion at a Working Group meeting, Second Sight were provided access to all relevant legal files, and I was involved in making sure that they were provided with such files as they requested. However, I recall that it later transpired that they also wanted access to legal advice which POL considered to be legally privileged. I do not know what this specific advice was. As far as I recall I only became aware in early 2015 of the fact that Second Sight wanted access to privileged legal advice. Apart from the POL investigation reports on the applications within the Scheme, I have no recollection of any other investigation reports Second Sight wanted access to.

69. As alluded to above, I believe that there was a difference in opinion between Second Sight and POL in terms of the scope of Second Sight's work in relation to the Scheme, in so far as POL thought that Second Sight's role was limited to reviewing POL investigation reports on applications within the Scheme, but Second Sight seemed to think it had a wider role, although I do not recall that this wider role was ever fully articulated. Apart from the privileged information contained in the legal files, I think that Second Sight was provided with the information and the documents it requested and needed to fulfil its role in relation to the Scheme. However, there was clearly a disagreement about the scope of Second Sight's work and their access to wider information relating to that. Nevertheless, the only issue I can specifically recall in connection to this is the issue of Second Sight's access to email data relating to the Spot Review 5, which I have dealt with earlier in this statement.

70. I have been asked to what extent I agreed with Mark Davies' point - "*I have been thinking about the question we will get about why we won't let SS look at everything - too which the obvious answer is there is no evidence of a problem*" (POL00150869). I cannot recall this email or whether I had any view on it. If I had to speculate on how I may have approached this email, I believe I would have been considering whether or not, or how, the provision of all information requested by Second Sight would have assisted individual applicants in the Scheme.

71. I do not know the eventual outcome in respect of POL's position on retaining Horizon data held by Fujitsu beyond the normal seven year retention period once the Scheme had ended. However, my position at page 7 of (POL00108521) that a "proper retention policy exists for a purpose and I do not think we can put a blanket ban on destruction" needs to be read in context of the rest of that email chain. As a general proposition I do think that a retention policy exists for a reason, for example a legal reason related to Data Protection, and therefore I would not think it appropriate to put a blanket ban on the destruction of data and documents, as doing so could risk breaching legal requirements. However, when reading the rest of that email chain at (POL00108521), it is clear that my suggestion in these specific circumstances was for POL to tell Fujitsu to immediately stop destroying data at the end of the seven year retention period as a temporary measure to ensure that no data was destroyed that may be needed to investigate Scheme applications, and then come to a considered view about retention of data going forward which could be agreed with Fujitsu. I escalated the matter to the CIO to ensure that data destruction at Fujitsu was halted as a matter of urgency.

72. I do not recall the Board meeting on 21 May 2014, but I have reviewed the minutes of such meeting at (POL00021525). I do not know what Alwen Lyons meant when she wrote "It's a bit smoke and mirrors but here are the minutes, comments asap please" at (POL00148420). From my review of the minutes, it seems that subject to the work of Deloitte, there remained at Board level an appetite for amending the Scheme.

73. I believe the meeting with Second Sight on 11 August 2014 at (**POL00129437**) probably came about as a result of an action point raised in a previous Working Group meeting. This action would have likely related to POL's comments on Second Sight's draft report of August 2014. Part of my role was to try and ensure that whatever POL decided it wanted to do, it did so in a way that was transparent and properly documented. This would have included making sure that if there was an action point raised by the Working Group, such action point was addressed. Exactly how it was addressed was a matter for POL. In relation to the August 2014 Report my main interest would have been the Scheme and trying to make sure the applicants within it were assisted by any reports delivered by Second Sight. It would not have been helpful for an applicant to attend mediation and raise an issue citing a Second Sight report, for a POL representative to then tell the applicant that they disagree with the report as it goes beyond the scope of Second Sight's expertise or scope of work.

74. I did not disagree with the position taken by POL in the meeting on 11 August, particularly in that I agreed with Paragraph 22 of the minutes that it could not be right for Second Sight to undertake work on instructions from other people (e.g. MPs) and require POL to fund this without prior agreement. I would have thought it reasonable that any additional work commissioned from Second Sight should be discussed with POL first to ensure it either fell within the scope of their work, or was generally accepted as new work to be undertaken and funded.



75. I did not draft the briefing at (**POL00149393**) and I cannot recall whether I contributed to it. I imagine it would have been compiled with the input from various people within POL, and presumably it would have been agreed with POL's General Counsel.

76. I have been asked in particular to what extent I agreed with the following passage of the briefing at (**POL00149393**): *"To start from a contrary position, whereby PO must prove the system's reliability, goes against both common sense and established practice. Bluntly, it is not PO's job to prove that Horizon did not cause the losses incurred by Applicants to the Scheme, but for Applicants to provide evidence that it did"*. This appears to me to be a legal position and I imagine it was drafted by a lawyer, but I cannot be certain. I do not recall if I held any particular view in relation to this.

77. I also find it difficult to say now the extent to which I agreed or disagreed with the commentary on Second Sight's reports within the briefing at (**POL00149393**). POL's assessment of the reports would not have been a matter for me and I seldom, if ever, read POL's investigation reports on Scheme applications, nor Second Sight's review of those reports. However, there was certainly an expectation at the outset by POL (and I believe also the Working Group Chair, although I cannot recall this for certain) that Second Sight would give a recommendation on whether mediation was appropriate in the cases that they reviewed. As far as I recall there was an early case in the Scheme where Second Sight did not recommend mediation, following their review of POL's investigation.



However, Second Sight later announced that they would recommend mediation in all cases going forward on the basis, as far as I recall, of a query from JFSA. I think the Working Group Chair asked Second Sight to reconsider this position, but they declined. I would like to emphasise to the Inquiry that I do not remember the exact detail of any discussions had in relation to this and due to the amount of time that has passed, it is possible that my recollection may be inaccurate.

**POL's approach to the substantive issues**

78. I confirm that I have considered the following documents:

- i. (FUJ00086811) - "the Helen Rose report";
- ii. (POL00020634) - email from Andrew Parsons to me and others on 17 June 2014;
- iii. (POL00021764) - email from Andrew Parsons to me on 31 July 2014;
- iv. (POL00021855) - email from Melanie Corfield to me on 8 August 2014 and the attachment at (POL00021856);
- v. (POL00022216) - letter from Rodric Williams to Second Sight on 14 August 2014);
- vi. (POL00040255) - email from Angela Van Den Bogerd to Andrew Pheasant on 11 September 2014 the attachment at (POL00040256);
- vii. (POL00022240) - my email to Chris Aujard and others on 3 September 2014 and the attachment at (POL00022241);
- viii. (POL00006558) - my email to Andrew Pheasant and others on 19 September 2014 and the attachment at (POL00006559);

- ix. **(POL00101398)** – my email to Richard Callard on 25 September 2014;
- x. **(POL00214304)** - email from Ian Henderson to me on 9 December 2014 and the attachment at **(POL00214305)**;
- xi. **(POL00040498)** - email from Andrew Parsons to me on 10 December 2014;
- xii. **(POL00040518)** - email exchange with Paul Loraine and others on 19 December 2014;
- xiii. **(POL00022296)** - attendance note of meeting with Second Sight;
- xiv. **(POL00132936)** – my email to Chris Aujard and others on 22 January 2015;
- xv. **(POL00102236)** - email to Alisdair Cameron and others on 27 February 2015; and
- xvi. **(POL00040837)** - Andrew Parsons' email to me on 3 February 2015 and the attachment at **(POL00040838)**.

79. It would not have been my decision on how to respond to the substantive issues raised by applicants in the Scheme or by Second Sight, as that was a matter for the relevant subject experts, the POL team investigating Scheme applications and lawyers. Although substantive issues did cross my desk on occasion, the extent of my involvement would have been to attempt to review them, raise what I thought might be relevant questions and refer to the relevant subject experts to provide Angela Van Den Bogerd, POL General Counsel and any other person who I thought needed to be aware with the answers or further information they

needed to respond to such issues. It was very much a case of trying to coordinate activity to make sure the right people were involved so that matters were resolved.

80. I believe that I became aware of the Helen Rose report at some point in 2014, although I do not recall exactly when. Following my review of the report and the email correspondence around this matter, I do not think that I appreciated at the time the extent to which the contents of it may have been important to those SPMs who had been convicted of theft, a fraud offence or false accounting on the basis of data generated by the Horizon IT System.

81. Having looked at the email chain at (**POL00148049**), it seems that the Helen Rose report was a matter that arose in the Working Group and I did raise questions about it. However, on review of my emails in this chain, it is clear that I was trying to coordinate answers to potential questions raised by the report by trying to make relevant people aware of the contents of the report. In particular, I would want to ensure that Angela Van Den Bogerd and POL General Counsel were in possession of all the facts to deal with the issue at the Working Group, and that lawyers were briefing POL General Counsel in relation to any related disclosure issues. I would imagine I would have drafted my latest email in this chain following a conversation with Rodric Williams from Legal and Andrew Parsons. I do not recall what subsequently happened in relation to this matter at the Working Group.

82. I would like to stress to the Inquiry that I was not involved in the process of disclosure in relation to criminal prosecutions as this fell entirely outside of my responsibility, expertise and competence. I was aware that a process had been established (I believe prior to my involvement with the Scheme), to ensure that POL fulfilled its disclosure obligations. My only involvement was that the cost of the disclosure exercise was met by the Scheme budget. Otherwise, apart from getting input from lawyers on the subject (if needed) when pulling together briefings, I was not involved at all in the exercise.

83. I note that I am also copied in to an email from Andrew Parsons on 17 June 2014, which refers to the Helen Rose report (**POL00020634**). I do not recall this email and I believe I would have been copied in for information purposes only. I do not know if the advice set out by Mr Parsons was followed - *“try to down play the importance of the HR report in any POL Investigation Reports. We recommend minimalizing or ignoring entirely the HR Report when responding to CQRs”*. I believe it is likely that I would have read this email, but not personally taken any further action in relation to it. I was not involved in the POL investigation reports and having looked at the subject experts on the copy list of this email, I believe I would have considered that this was a matter for them.

84. I have been asked about my involvement in POL's response to Second Sight on the allegation that there were unexplained gains in the POL suspense account as a result of SPMs settling false discrepancies. I would not have got involved in the specific detail or technicalities related to POL suspense accounts as it was a

subject outside of my area of knowledge and expertise and a matter for the subject experts such as POL Finance. I think this issue was an action point arising out of a Working Group meeting. As alluded to earlier in this statement, I was responsible for coordinating matters to ensure that action points raised by the Working Group were addressed and completed by POL. To the best of my recollection, I believe I commissioned some work in relation to this issue on behalf of POL, which culminated in a meeting between Second Sight and POL's CFO to answer Second Sight's outstanding questions. I helped to organise this meeting, but I would not have attended the meeting or been involved in the detail of the discussions.

85. I have also been asked various questions that relate to Second Sight's part 2 report. As far as I can recall, Second Sight had issued an interim report in 2013 (prior to my involvement in the Scheme) and then what I thought was called the part 2 briefing report in April 2015 (after I had retired from POL). However, having now reviewed the Rule 9 disclosure I can see that there was also a "thematic report" in August 2014, also called the part two report. From the documents I have read this report was not meant for publication but was produced as a briefing report for Scheme applicants. The documents show that I would have been involved in discussions on POL's strategy in responding to the August 2014 report as it was relevant to the Scheme and I can see from the email at **(POL00006558)** that I forwarded a document to Andrew Pheasant and others which appears to be POL's response to such report, in which I suggested some minor track changes. This document is found at **(POL00006559)**. I can see that my suggestions were only minor formatting changes or slight re-wording of

sentences to aid understanding. I also note that I offered to draft a letter from Angela Van Den Bogerd to accompany the amended response when sending it off, however, I believe this letter would have simply been a cover letter, and my offer to draft it was consistent with that part of my role which saw me co-ordinating activity to support POL members of the Working Group.

86. The content of my email to Alwen Lyons on 22 August 2014 at (POL00148870) relates to Second Sight's "thematic report" of August 2014, and would have been an amalgam of input from others which I pulled together. I think that much of this email's content would have been drawn from POL comments already passed to Second Sight on the draft report, for example, Rodric Williams' letter, addressed to Second Sight and dated 14 August 2014 (**POL00022216**).

87. I assume that I sent my email to Alwen Lyons because Second Sight's August 2014 report concerned matters relating to the Scheme which may become public, and I had been asked to alert the Board of this, presumably on the basis that it would be inappropriate for Board members to read about the report in the media without having been briefed about it.

88. I would have been satisfied that the information I included in this email to Alwen Lyons was accurate because it would have been an agreed approach using information and opinions gathered from relevant subject experts. I wouldn't question the information provided by subject experts that I pulled together for a

briefing to the Board, unless something jumped out at me. I cannot recall a situation where this ever occurred.

89. In relation to POL sharing Second Sight's August 2014 report with UKGI/ShEx and / or government, I think I saw it as being ultimately a matter for the Board, as is indicated in my email to Richard Callard on 25 September 2014 (**POL00101398**). The Inquiry will see from this email that I also thought it was important for the Working Group, or at least the Chair, to be consulted on the matter of sharing the report with Ministers should POL wish to do so as POL, like all members of the Working Group, was subject to the confidentiality restrictions relating to the Working Group. I believe the August 2014 Second Sight report was shared with ShEx/UKGI, because ShEx was represented on the Board and the Board members would, I assume, have received a copy of the report.

90. I do not recall personally briefing the Board, ShEx or Government on POL's strategy in its response to the substantive issues raised by applicants and Second Sight in the Scheme. The Board would, I assume, have seen the various Second Sight reports and POL's response to them, and then been able ask any further questions of the subject experts. I may then have provided the Board with whatever briefing it asked for, and what the General Counsel asked me to give. I do not know whether the Second Sight reports were ever given to Ministers and, if so, whether they asked any further questions following receipt.



**Criminal cases and new expert:**

91. I do not recall having any involvement in POL's review of criminal convictions secured using data generated by the Horizon IT System. I may have been aware of this work happening, but this would have been dealt with by POL's legal team and would have been outside of my responsibility and expertise.

92. I also do not believe I had any involvement POL's approach to Professor Kramer and Dr Dulay to prepare an expert report on Horizon – again, this was a matter which would have been dealt with by POL's legal team. If I were involved then I have no recollection of it and it could only have been in some peripheral way.

93. I do not recall my email to Patrick Bourke and others on 23 October 2014 at (POL00091397), nor do I know what James Davidson meant when writing "*The continued failure of Second Sight (and now potentially Imperial College) to acknowledge (or at worst engage with) this core principle results in much of the frustration...*". I do not recall what occurred after I forwarded this to Patrick Bourke with my further questions. It was often the case that something crossed my desk which I thought it may be important and beyond my role and expertise, and I would pass it on to others in POL with the knowledge and expertise to deal with it. Generally I would only follow things up if they directly affected the Scheme or the Working Group, otherwise I would assume that they would have been picked up and dealt with by those responsible.

**Closure of Working Group**

94. I confirm that I have reviewed the following documents:

- i. **(POL00149574)** – my email to Angela Van Den Bogerd and others on 19 November 2014 and the attachment at **(POL00149575)**;
- ii. **(POL00116814)** - email from Patrick Bourke to you me and others on 24 November 2014;
- iii. **(UKGI00002621)** - email from Richard Callard to me on 11 December 2014 and the attachment at **(UKGI00002622)**;
- iv. **(POL00101845)** - email exchange with Rodric Williams on 12 December 2014 and the attachment at **(POL00101846)**;
- v. **(POL00076592)** - email exchange with Patick Bourke and others on 16/17 December 2014;
- vi. **(UKGI00002892)** - email exchange with Tim McInnes and others on 18 December 2014;
- vii. **(POL00150466)** - email from Patrick Bourke to me on 1 January 2015 and the attachment at **(POL00150467)**;
- viii. **(POL00022293)** - agenda and papers for Project Sparrow Sub-Committee meeting on 12 January 2015;
- ix. **(POL00006575)** - minutes of the Project Sparrow Sub-Committee meeting on 12 January 2015;
- x. **(POL00109892)** - email exchange with Avene O'Farrell on 20 January 2015;

- xi. **(POL00150852)** – my email of 9 January 2015;
- xii. **(POL00102109)** - email chain with Patrick Bourke and others on 4 February 2015 and the attachment at **(POL00130853)**;
- xiii. **(POL00311943)** - my email to Chris Aujard and others on 9 February 2015 and the attachment at **(POL00311944)**;
- xiv. **(POL00021908)** - email from Andrew Parsons to me on 9 February 2015);
- xv. **(POL00132939)** - email exchange on 11 February 2015;
- xvi. **(POL00102161)** - email from Larissa Wilson to me and others on 16 February 2015 and the attachments at **(POL00102162)** and **(POL00102163)**;
- xvii. **(POL00006574)** - minutes of the Project Sparrow Sub-Committee meeting on 18 February 2015;
- xviii. **(POL00151290)** - my email to Patrick Bourke and others on 26 February 2015 and the attachment at **(POL00151291)**;
- xix. **(POL00102245)** - email exchange with Chris Aujard on 27 February 2015;
- xx. **(POL00063428)** - note of meeting on 4 March 2015; and
- xxi. **(POL00022498)** - email from Mark Underwood to Melanie Corfield and the attachment at **(POL00022499)**.

95. I do not recall the specific reasons as to why POL considered alternatives to the Scheme again in late 2014 / early 2015. As mentioned previously in this statement, it was my understanding that the Working Group and the Scheme

were under continuous review by the Board, the Sub-Committee and ExCo throughout my involvement in the Scheme. It seems that there was an ExCo discussion about the Scheme which is referenced at **(POL00021908)**, following which the incoming General Counsel, Jane MacLeod, put a proposal to the Sub-Committee jointly with Mark Davies, Communications Director, suggesting amendments to the Scheme in February 2015 **(POL00102162)**. I do not recall that discussion and do not believe I was involved in it. The document at **(POL00006574)** suggests that the proposal was agreed in principle by the Sub-Committee on 18 February 2015, subject to notification of the Board and the completion of some further work. As far as I recall there was a further discussion between the new POL General Counsel and the CEO, shortly after the Sub-Committee meeting, which I attended, which resulted in bringing forward the amendments to the Scheme that the Sub-Committee had agreed. I cannot recall specifically what prompted that but I think it may have been as a result of me asking the new POL General Counsel how she wanted the Programme Team to handle the upcoming Working Group meeting in view of the fact that a decision had been made to alter the Scheme.

96. I was clearly involved in some, but not all discussions on amending/closing the Scheme. Ultimately it was the Sub-Committee, presumably endorsed by the Board, that decided. As far as I recall my view was that it was a matter for POL to decide what it wanted to do. I think that I felt that if the original idea of the Scheme was aimed at hearing SPM complaints with a view to resolving complaints and drawing a line under the matter, then it had not worked. If anything, some SPMs and JFSA seemed less happy than when the Scheme

started, Second Sight was publicly critical of POL and there was, as far as I recall, a notification of legal action by a group of SPMs in the future. As such, I agreed that there was little point in carrying on with the Scheme in the same format, as long as those applicants remaining in the Scheme were able to have their complaints investigated and mediated as they had been expecting. I was also leaving shortly, so whatever decision was made I was unlikely to be involved in the next steps.

97. In terms of what POL wanted out of the Scheme and the Working group, from the documents provided to me I cannot see that the outcomes POL desired were achieved. This may be the reason why a decision was taken to close down the Working Group and Scheme. I think (and hope) that at least a small number of applicants in the Scheme who submitted a complaint which was resolved were satisfied.

### **Deloitte & Project Zebra**

98. I confirm that I have considered the following documents provided to me:

- i. **POL00138190** - email from to me Lesley Sewell and others on 31 March 2014 and the attachment at (**POL00138191**);
- ii. (POL00117519) - email from Rodric Williams to Gareth James on 2 April 2014 and the attachments at (**POL00117520**), (**POL00117521**), (**POL00117522**), (**POL00117523**) and (**POL00117542**);
- iii. (**POL00138209**) my email to Gareth James on 3 April 2014;

- iv. (POL00108462) - engagement letter dated 9 April 2014;
- v. (POL00138270) - email from Gareth James to Chris Aujard and others on 28 April 2014 and t(POL0013827);
- vi. (POL00328471) - email from Gareth James to Lesley Sewell on 29 April 2014 and the attachment (POL00294440);
- vii. (POL00147957) - email from Gareth James to me on 7 April 2014; and
- viii. (POL00107160) - Deloitte report dated 23 May 2014.

99. I do not know where the name 'Project Zebra' came from and as far as I can recall I only had a tangential role in commissioning the work from Deloitte. I believe I was asked to assist POL General Counsel and the CIO to commission the work for the Board, but I do not know who was responsible for deciding the ambit of "Project Zebra" or why it was limited to a review of assurance work, rather than an investigation in itself. It seems that this was a matter for the Board, POL General Counsel and the CIO, as indicated by the email chain at (POL00147957), where I appear to be coordinating the work by forwarding my discussions with Deloitte to relevant people, and helping to arrange a meeting between Deloitte and the CIO to finalise the scope of the project.

100. I have no recollection of what POL did with the reports produced by Deloitte and I suspect that I never engaged with the content of such reports. It would have been for relevant subject experts to decide whether it raised any matter of importance and for the Board to decide whether the contents gave it the

reassurances it required in relation to Horizon. As such, I do not think I would have had any views on the contents of these reports.

**POL's approach to journalists**

101. I confirm that I have considered the following documents:

- i. **(POL00149829)** - email from Melanie Corfield to me on 5 December 2014);
- ii. **(POL00109547)** - email exchange between me and Mark Davies on 7 November 2014;
- iii. **(POL00101712)** - email from me to Mark Davies on 8 December 2014;  
and
- iv. **(POL00101728)** - email from me to Melanie Corfield on 9 December 2014.

102. I was sometimes asked for a view on how POL should respond to journalists raising issues regarding the Horizon IT System, but I had no authority to make the final decisions on this and my input generally related to matters regarding the Scheme and the Working Group. I also liaised with Comms if anything arose in relation the Scheme requiring a Comms response. However, I am not a Comms expert, so any view that I did provide on how to respond to journalists, or what should be in a Comms response, would have been a lay-person's view, and ultimately may not have been followed. I imagine my general view would have been to engage as little as possible while the Scheme was running but ultimately such decisions were not for me to make.



103. I do not recall if POL had a specific strategy on responding to journalists. As far as I was aware, journalist enquiries were dealt with on a case by case basis.

### **Leaving POL**

104. As mentioned earlier in this statement, I left POL on 31 March 2015 to retire. I had always intended to retire at this point, and I recall making that clear before signing my full time contract with POL. There was no other reason as to why I left POL at this time.

### **General**

105. I was not involved in any of the following matters: (1) POL prosecutions of SPMs, which, to the best of my knowledge had ceased before my involvement in the Scheme (2) the disclosure of information to SPMs convicted on the basis of Horizon data (which was an ongoing exercise as far as I am aware which was undertaken by lawyers and (3) GLO proceedings, which occurred after my retirement .

106. My involvement in the Scheme was approximately 18 months and I feel that I can only reflect on this short time period, based on the knowledge that I had at that time. I do not remember for certain how many prosecutions I understood POL had brought since Horizon was introduced, but I think I believed it to be around 200. I cannot now recall where I got that figure from. There were less than 150 applications to the Scheme, and of this number between 30 and 40 of the

complaints related to cases involving a criminal prosecution. In light of these figures I agreed with POL that the numbers were small compared to the total number of Horizon users. I understood there to be a high level of confidence in POL at senior levels, and I think NFSP, about the integrity of Horizon. Due to this, I honestly believed at the time that POL was getting the balance right between investigating complaints and defending the integrity of its systems. I now understand that the number of Horizon related prosecutions and complaints are far greater than anything that I was aware of during my involvement in the Scheme. However, in absence of this knowledge at the time, I do not know how I would have been able to do anything differently in relation to handling challenges to the integrity of the Horizon IT System by SPMs, Members of Parliament, journalists and members of the public.

107. Having now read the Helen Rose and Deloitte reports with the information I have gleaned from the Inquiry, the various court cases and media reports during the years since I left POL, I have considered whether I should have engaged further with those reports and other substantive issues that crossed my desk (even though this fell outside the scope of my role), and if so, whether this would have made any difference to where matters are today. However, given the technicalities of those reports and the substantive matters relating to the Horizon IT system, I do not think I would have understood the issues enough to comfortably challenge or question what the subject experts were saying about Horizon, or even realise there was a potential need to challenge any assurances.

108. I would like to express to the Inquiry how sorry I am to the SPMs and their families who have been affected. I have watched with incredulity as the situation has changed in comparison to how I understood matters to be when I left POL on 31 March 2015, to where we are now.

109. Other than the matters addressed within this statement, there are no other matters that I would like to bring to the attention of the Chair of the Inquiry.

I believe the content of this statement to be true.

Signed 

Dated: 08 April 2024

**Index to the First Witness Statement of Belinda Cortes-Martin**

<b>No</b>	<b>URN</b>	<b>Document Description</b>	<b>Control Number</b>
1.	<b>POL00041564</b>	Bankruptcy, prosecution and disrupted livelihoods - Postmasters tell their story; reported by Rebecca Thomson - Article	POL-0038046
2.	<b>POL00026572</b>	Horizon – Response to Challenges Regarding Systems Integrity	POL-0023213
3.	<b>POL00149276</b>	Email chain including Melanie Corfield (POL); Belinda Crowe (POL); Patrick Bourke (POL) & Others Re: Remote access to reactive statement	POL-BSFF-0008396
4.	<b>POL00142406</b>	Email chain from Mark Underwood to Belinda Crowe, Patrick Bourke and Andrew Parsons Re: March 2010 - Incident Details	POL-0143638
5.	<b>POL00151216</b>	Email chain from Steve Allchorn to Mark Underwood re FW: Spot Review 5 Summary	POL-BSFF-0010328
6.	<b>POL00151217</b>	Summary of Information Provided by Post Office/Fujitsu to Second Sight	POL-BSFF-0010329
7.	<b>POL00116179</b>	Email from Sarah Paddison to Andy Holt, Susan Crichton, Angela Van-Den-Bogerd and others re Project Sparrow steering group	POL-0117178
8.	<b>POL00123004</b>	Email from Belinda Crowe to Andrew Parsons, Andy Holt and Angela Van-Den-Bogerd re Sparrow - text for CEO's report	POL-0129228
9.	<b>POL00099870</b>	Email chain from Belinda Crowe to Peter Batten re: Horizon PQs	POL-0099453
10.	<b>POL00137758</b>	Actions and Decisions from the Project Sparrow Steering Group meeting	POL-BSFF-0000259
11.	<b>POL00030694</b>	Note on resources for Project Sparrow	POL-0027176

12.	<b>POL00146921</b>	Project Sparrow Steering Board - Minutes of Meeting 25 November (no year date)	POL-BSFF-0006048
13.	<b>POL00146934</b>	Email from Angela Van-Den-Bogerd to Ruth X Barker, Belinda Crowe and Andrew Parsons. Re: Alan Bates Commented on 'DRAFT Media Statement - Mediation Scheme Closed to Applications in Mediation Scheme	POL-BSFF-0006061
14.	<b>POL00100003</b>	Post Office Limited, PROJECT SPARROW - UPDATE, 2013	POL-0099586
15.	<b>POL00146985</b>	Email from Andrew Parsons to Belinda Crowe, Chris Aujard cc Claire Parmenter RE: Second Sight Engagement Letter	POL-BSFF-0006110
16.	<b>POL00146986</b>	Engagement letter addressed to Ron and Ian, in relation to the Initial Complaint Review & Mediation Scheme	POL-BSFF-0006111
17.	<b>POL00146987</b>	Draft Letter from Post Office to Ron Warmington & Ian Henderson RE: Engagement Letter in relation to the Initial Complaint Review & Mediation Scheme (the "Scheme")	POL-BSFF-0006112
18.	<b>POL00147108</b>	Email from David Oliver to Belinda Crowe, Chris Aujard RE: Briefing for POL CEO Bilat with Alice	POL-BSFF-0006231
19.	<b>POL00147109</b>	Note from Belinda Crowe to Paula Vennells cc'ing Chris Aujard, Hugh Flemington and others re: Briefing for 1-2-1 with Alice.	POL-BSFF-0006232
20.	<b>POL00147258</b>	Email from Belinda Crowe to Chris Aujard - RE: DRAFT - Second Sight Engagement Letter	POL-BSFF-0006381
21.	<b>POL00147259</b>	Engagement Letter in relation to the Initial Complaint Review and Mediation Scheme	POL-BSFF-0006382
22.	<b>POL00108231</b>	Briefing Report For Meeting With Rt Hon James Arbuthnot MP	POL-0110959

23.	<b>POL00040074</b>	Email from Nicky Mal to Chris Aujard, Fay Healey, Belinda Crowe and others, RE: "The Scheme Programme Board Papers."	POL-0036556
24.	<b>POL00040075</b>	Post Office Media Scenario Planning- Initial Complaint Review and Mediation Scheme Presentation	POL-0036557
25.	<b>POL00040076</b>	Key Themes Emerging out of the applications to the scheme	POL-0036558
26.	<b>POL00040077</b>	Independent Resolution of future cases policy project brief	POL-0036559
27.	<b>POL00040078</b>	Initial Complaint Review and Mediation Scheme Programme Board	POL-0036560
28.	<b>POL00100200</b>	Letter from David Oliver to Paula Vennells, RE: Second Sight.	POL-0099783
29.	<b>POL00116275</b>	Email chain from Belinda Crowe to Paula Vennells, Mark R Davies, Martin Edwards and others re Sparrow	POL-0117268
30.	<b>POL00116276</b>	Success Criteria Document - SS	POL-0117269
31.	<b>POL00027452</b>	paper prepared for the Post Office Ltd Board by Belinda Crowe	POL-0024093
32.	<b>POL00100322</b>	Memorandum from Belinda Crowe to Paula Vennells, and others, re: Briefing for the meetings with Second Sight and Sir Anthony Hooper on Monday 24 February.	POL-0099905
33.	<b>POL00302500</b>	Post Office Limited Board meeting minutes	POL-BSFF-0140550

34.	<b>POL00138176</b>	Initial Complaints Review & Case Mediation Scheme Programme Board	POL-BSFF-0000405
35.	<b>POL00147643</b>	Initial Complaints Review & Case Mediation Scheme Programme Board	POL-BSFF-0006766
36.	<b>POL00147644</b>	Post Office Limited: Horizon Mediation Scheme	POL-BSFF-0006767
37.	<b>POL00107317</b>	Legally privileged report prepared by Linklaters on behalf of Post Office into initial complaint review and mediation scheme legal issues	POL-0105625
38.	<b>POL00147831</b>	Email from Rodric Williams to Chris Aujard, David Oliver, Angela Van-Den-Bogerd re POL's Legal Files: Draft Email to SS for Comment Please	POL-BSFF-0006954
39.	<b>POL00147933</b>	Email from Carolyn Low to Chris Aujard, Belinda Crow, cc'd Jonathan Swil and others - Re: Scheme options paper : to be discussed at 10.30 on 3/4/14	POL-BSFF-0007056
40.	<b>POL00147934</b>	Initial complaint and Mediation Scheme: The Way Forward - Summary of Issues and Options Appraisal.	POL-BSFF-0007057
41.	<b>POL00158128</b>	Email from David Oliver to Paula Vennells and cc'd Martin Edwards, Belinda Crowe and others re: Slides For Scheme discussion on Monday	POL-0146455
42.	<b>POL00158129</b>	PO Initial Complaint and Mediation Scheme slides on the way forward - Discussion draft: Summary of general issues and options	POL-0146456
43.	<b>POL00162134</b>	Email chain from Chris Aujard to Alice Perkins, Cc Mark Davies, Paula Vennells and others re Sparrow Sub-Committee	POL-0150577
44.	<b>POL00116439</b>	Post Office Project Sparrow Sub Committee Meeting ToR and Initial Complaint Review and Mediation Scheme document	POL-0117423
45.	<b>POL00116444</b>	Email from Paula Vennells to Belinda Crowe, Mark R Davies cc. Chris Aujard and others re: Alice.	POL-0117428



46.	<b>POL00006565</b>	Project Sparrow Sub-Committee Minutes	POL-0017844
47.	<b>POL00138282</b>	Initial Complaints Review & Case Mediation Scheme Programme Board	POL-BSFF-0000508
48.	<b>POL00148049</b>	Email from Belinda Crowe to Angela Van-Den-Bogerd, Andrew Parsons, Andy Holt and Rodric Williams re: Post Office Mediation Claims.	POL-BSFF-0007172
49.	<b>POL00148068</b>	Email trail from Belinda Crowe to Chris Aujard, David Oliver cc Belinda Crowe re: Sparrow Sub- Committee	POL-BSFF-0007191
50.	<b>POL00022683</b>	Letter from Alan Bates to Jo Swinson re: Justice for Subpostmasters Alliance, Initial Case Review & Mediation Scheme	POL-0019162
51.	<b>POL00148101</b>	Email from Belinda Crowe to Mark R Davies, Sophie Bialaszewski, Martin Edwards, and others re: Alan Bates letter to Jo Swinson	POL-BSFF-0007224
52.	<b>POL00100566</b>	Email Chain from Peter Batten to Belinda Crowe re Published Mediation Scheme Docs	POL-0100149
53.	<b>POL00100577</b>	Email Chain from Peter Batten to Belinda Crowe re Published Mediation Scheme Docs	POL-0100160
54.	<b>POL00100578</b>	Letters from Jenny Willott MP (on behalf of BIS) to Alan Bates and Sir Anthony Hooper re Initial Case Review and Mediation Scheme	POL-0100161
55.	<b>POL00148108</b>	Initial Complaint Review and Mediation Scheme- ExCo Sub-Committee - Response to JFSA Letter	POL-BSFF-0007231
56.	<b>UKGI00002255</b>	Email from Belinda Crowe to Peter Batten, Richard Callard, cc'ing Martin Edwards and Belinda Crowe, Re: Horizon JFSA letter submission (letters) (2).doc	UKGI013069-001
57.	<b>UKGI00002256</b>	DRAFT letters from Jenny Willott MP to Alan Bates, Sir Anthony Hooper and Paula Vennells dated April 2014	UKGI013070-001

58.	<b>POL00148173</b>	Email from Belinda Crowe to Chris Aujard cc'ing Belinda Crowe and David Oliver re: POL_Second Sight_250414_2.doc	POL-BSFF-0007296
59.	<b>POL00148174</b>	Post Office Ltd Board Sub Committee The role of Second Sight in supporting the Scheme	POL-BSFF-0007297
60.	<b>POL00006566</b>	Project Sparrow Sub-committee Minutes 30 April 2014	POL-0017845
61.	<b>POL00040153</b>	Email from David Oliver to Chris Aujard, Belinda Crowe, RE: Working Group 30 April Briefing Note	POL-0036635
62.	<b>POL00040154</b>	Post Office Briefing Note, Working Group	POL-0036636
63.	<b>POL00116535</b>	Email chain with David Oliver, Mark R Davies and Others - Re: JA Handling Plan - Willott DO Comments	POL-0114596
64.	<b>POL00108521</b>	Email from Lesley J Sewell to Andy Holt, Belinda Crowe, Chris Aujard and others re: Requests to retain Fujitsu data (CRO3170/ROM3170)	POL-0106618
65.	<b>POL00116562</b>	Email chain from Martin Edwards to Belinda Crowe, Mark R Davies and others RE: Sparrow: Draft Letters and Next steps	POL-0117490
66.	<b>POL00116563</b>	Draft Letter to James Arbuthnot re the Mediation Scheme and MPs involvement	POL-0117491
67.	<b>POL00021426</b>	Audit Risk and Compliance Sub-Committee Minutes of 15/05/2014	POL-0018056
68.	<b>POL00021525</b>	Meeting Minutes: minutes for Board meeting held on 21st May 2014	POL0000058
69.	<b>POL00148420</b>	Email from Alwen Lyons to Christopher Aujard and Belinda Crowe RE: Draft Minutes in Confidence.	POL-BSFF-0007543
70.	<b>POL00148478</b>	Email from David Oliver to Belinda Crowe, Mark R Davies, Chris Aujard and others - Re: First draft of slides for Alice on Monday	POL-BSFF-0007601

71.	<b>POL00148479</b>	Chairman Briefing DRAFT NOT POLICY	POL-BSFF-0007602
72.	<b>POL00148480</b>	Scenario One - Post Office Take Control DRAFT NOT POLICY	POL-BSFF-0007603
73.	<b>POL00148481</b>	Scenario Two Continuity DRAFT NOT POLICY	POL-BSFF-0007604
74.	<b>POL00148482</b>	Scenario Three Post Office Defend Position DRAFT NOT POLICY	POL-BSFF-0007605
75.	<b>POL00168040</b>	Email from David Oliver to Mark Davies, Belinda Crowe, Sophie Bialaszewski RE: Pack for Alice meeting	POL-0163337
76.	<b>POL00168041</b>	Chairman Briefing Session Sparrow draft	POL-0163338
77.	<b>POL00027369</b>	Post Office Ltd Board Sub Committee – Initial Complaints Review and Mediation Scheme: The way forward	POL-0024010
78.	<b>POL00149689</b>	email from Stephen Hocking to Rodric Williams, Chris Aujard, Belinda Crowe and others re Strictly Private & Confidential - Subject to Legal Privilege	POL-BSFF-0008807
79.	<b>POL00006571</b>	Project Sparrow Sub-Committee Minutes 6 June 2014	POL-0017847
80.	<b>POL00000213</b>	Engagement letter of Ron Warmington & Ian Henderson in relation to Initial Complaint Review & Mediation Scheme	VIS00001187
81.	<b>POL00021762</b>	Email from Belinda Crowe to Charles Colquhoun, Rod Ismay and Andrew Parsons re: Suspense account paper Second Sight	POL-0018241
82.	<b>POL00022168</b>	Email from Belinda Crowe to Chris Aujard and Angela Van Den Bogerd regarding project sparrow	POL-0018647
83.	<b>POL00129437</b>	Second Sight's Draft Part Two Mediation Briefing Report – (“the Report”) re: Record of teleconference on 11 August 2014	POL-0135014

84.	<b>POL00101175</b>	Email chain from Belinda Crowe to Paula Vennells re: Second Sight part 2 report.	POL-0100758
85.	<b>POL00021800</b>	Email from Belinda Crowe to David Oliver, Melanie Corfield and Andrew Parsons RE: Fwd: Second Sight's Draft Part Two Report	POL-0018279
86.	<b>POL00021801</b>	Draft letter/email from Chris Aujard to Ron Warrington and Ian Harrington Re: Second Sight's Part Two Mediation Briefing Report	POL-0018280
87.	<b>POL00148870</b>	Email from Belinda Crowe to Alwen Lyons and Mark R Davies re Possible note for the Board re Second Sight's Part Two report	POL-BSFF-0007990
88.	<b>POL00027363</b>	Strictly Confidential Post Office Ltd Board Initial Complaints Review and Mediation Scheme: Update Paper by Chris Aujard and Belinda Crowe.	POL-0024004
89.	<b>POL00116714</b>	Email from Gavin Lambert to Gavin Lambert re FW: Sparrow	POL-0117584
90.	<b>POL00149392</b>	Email from Belinda Crowe (POL) to Mark R Davies (POL); Patrick Bourke (POL) & Others Re: CEO JA Version 3 Document	POL-BSFF-0008512
91.	<b>POL00149393</b>	Briefing for Chief Executive (In confidence) Paula Vennells conversation with James Arbuthnot	POL-BSFF-0008513
92.	<b>POL00149417</b>	Emails from Laura Pinkney to Andrew Parsons, cc: Tom Wechsler, Belinda Crowe and others re: Prosecution Docs [BD-4A.FID20472253].	POL-BSFF-0008537
93.	<b>POL00150869</b>	Email from Mark D Davies to Louise Chatfield re: Possible script	POL-BSFF-0009981
94.	<b>FUJ00086811</b>	Horizon data, Lepton SPSO 191320, Draft Report by Helen Rose	POINQ0092982F
95.	<b>POL00020634</b>	Email chain from Andrew Parsons to Chris Aujard, Rodric Williams, Jarnail Singh and others re: Helen Rose Report and CQRs re Gareth Jenkins report	POL-0013826

96.	<b>POL00021764</b>	Email from Andrew Parsons to Belinda Crowe, Angela Van-De-Bogerd re: Suspense account paper Second Sight	POL-0018243
97.	<b>POL00021855</b>	Email from Melanie Corfield to Belinda Crowe, Andrew Parsons, Angela Van Den Bogerd and others re: Response to Second Sight Part 2	POL-0018334
98.	<b>POL00021856</b>	Response to Second Sight Part 2	POL-0018335
99.	<b>POL00022216</b>	Letter (sent by email) from Rodric Williams to Ron Warmington and Ian Henderson regarding Second sight's part two mediation briefing report	POL-0018695
100.	<b>POL00040255</b>	Email from Angela Van- Den Bogerd to Andrew Pheasant Re: Response to Second Sight Part 2 report	POL-0036737
101.	<b>POL00040256</b>	Initial Complaint Review and Mediation Scheme, Reply of Post Office Limited to Second Sight's Briefing Report – Part Two	POL-0036738
102.	<b>POL00022240</b>	Email from Belinda Crowe to Chris Aujard regarding second sight part two – introductory section	POL-0018719
103.	<b>POL00022241</b>	Draft response to second sight's initial complaint review and mediation scheme briefing report - part 2	POL-0018720
104.	<b>POL00006558</b>	Email re Response to Second Sight Part 2 report Final Draft	POL-0017652
105.	<b>POL00006559</b>	Response to Second Sight Part 2 report Final Draft	POL-0017653
106.	<b>POL00101398</b>	Email from Belinda Crowe to Richard Callard, cc'd Chris Aujard, Gavin Lambert and others re: JFSA Letter	POL-0100981
107.	<b>POL00214304</b>	Email from Ian Henderson to Belinda Crowe, Chris Aujard, Tom Wechsler and others RE: Second Sight Questions for	POL-BSFF-0052367

		POL	
108.	<b>POL00214305</b>	Initial Complaint Review and Mediation Scheme	POL-BSFF-0052368
109.	<b>POL00040498</b>	Email from Andrew Parsons to Belinda Crowe, Mark Underwood, Re: Second Sight Questions for POL	POL-0036980
110.	<b>POL00040518</b>	Email from Paul Loraine to Andy Holt, Belinda Crowe re: Second Sight Questions - Your Help Needed	POL-0037000
111.	<b>POL00022296</b>	Notes on meeting held with Second Sight on the 9th of Jan 2015	POL-0018775
112.	<b>POL00132936</b>	Email from Belinda Crowe to Chris Aujard, Alisdair Cameron cc Ruth Phillips, Jane Hill, Mark R Davies RE: Sparrow	POL-0136273
113.	<b>POL00102236</b>	Email from Belinda Crowe to Alisdair Cameron, Mark Davies, Jane MacLeod and others. Re: "Catch up call with Second Sight".	POL-0101819
114.	<b>POL00040837</b>	Email sent from Andrew Parsons to Belinda Crowe re : Suspense account	POL-0037319
115.	<b>POL00040838</b>	Legal advice summary by Womble Bond Dickinson, re Access to suspense account data	POL-0037320
116.	<b>POL00091397</b>	Email from Belinda Crowe to Patrick Bourke, Tom Wechsler, Rodric Williams and others re Notes for the 1600 meeting	POL-0090419
117.	<b>POL00149574</b>	Email from Belinda Crowe to Angela Van-Den-Bogerd, Mark R Davies, Chris Aujard and others re Commercial in confidence – ExCo presentation.	POL-BSFF-0008694
118.	<b>POL00149575</b>	Powerpoint - Options for the Scheme	POL-BSFF-0008695



119.	<b>POL00116814</b>	Email to Chris Aujard, Rodric Williams, Mark R Davies and others from Patrick Bourke Re: Scheme - Con with Counsel	POL-0114611
120.	<b>UKGI00002621</b>	Email chain from Richard Callard to Peter Batten and Belinda Crowe with copy to Chris Aujard and others re: Sparrow Questions for Parliamentary Debate 17/12/2014	UKGI013435-001
121.	<b>UKGI00002622</b>	Draft - Response to the list of Sparrow Questions for Parliamentary Debate 17th December 2014	UKGI013436-001
122.	<b>POL00101845</b>	Email from Rodric Williams to Belinda Crowe re: Sparrow Questions	POL-0101428
123.	<b>POL00101846</b>	Email from Rodric Williams to Belinda Crowe, re: Sparrow Questions	POL-0101429
124.	<b>POL00076592</b>	Email from Tom Wechsler to Belinda Crowe, Rodric Williams and others Re: Jo's conversations with James Arbuthnot – actions coming out	POL-0073155
125.	<b>UKGI00002892</b>	Email chain from Belinda Crowe to Tim McInnes, cc'ing Richard Callard, Patrick Bourke and others re: Next Steps - Call on Sparrow	UKGI013706-001
126.	<b>POL00150466</b>	Email from Patrick Bourke to Belinda Crowe re: Suggestions for the Board	POL-BSFF-0009578
127.	<b>POL00150467</b>	Draft Proposition to Board - Sparrow 'Reset'	POL-BSFF-0009579
128.	<b>POL00022293</b>	Agenda for Sparrow sub-committee meeting to be held on the 12 Jan 2015 to discuss the initial compliant and mediation scheme.	POL-0018772
129.	<b>POL00006575</b>	Sparrow Sub-Committee Minutes 12 Jan 2015	POL-0017849



130.	<b>POL00109892</b>	Email from Avene O'Farrell to Belinda Crowe and Alisdair Cameron, cc Chris Aujard and Gavin Lambert re Second Sight meeting with finance team to discuss suspense accounts	POL-0111104
131.	<b>POL00150852</b>	Email from Rodric Williams to Andrew Parsons re: Second Sight - Part 2 Questions	POL-BSFF-0009964
132.	<b>POL00102109</b>	Email from Patrick Bourke to Mark R Davies and Belinda Crowe; re: Next steps	POL-0101692
133.	<b>POL00130853</b>	Post Office - Risks and Second Sight Report	POL-0120752
134.	<b>POL00311943</b>	Email from Belinda Crowe to Chris Aujard, Andrew Parsons, Rodric Williams and others re: Note of telecon with Ian Henderson 20 Jan	POL-BSFF-0149993
135.	<b>POL00311944</b>	Note of call with Ian Henderson - Second Sight	POL-BSFF-0149994
136.	<b>POL00021908</b>	Email from Andrew Parsons to Belinda Crowe re: URGENT - paper for sub committee	POL-0018387
137.	<b>POL00132939</b>	Email from Mark Underwood to Belinda Crowe, Chris Aujard, Andrew Parsons RE: Note of telecon with Ian Henderson 20 Jan	POL-0136276
138.	<b>POL00102161</b>	Email from Larissa Wilson to Mark R Davies, Belinda Crowe, Jane MacLeod re 2015 02 18 Sparrow papers	POL-0101744
139.	<b>POL00102162</b>	Project Sparrow Sub-committee Update and Options report v6	POL-0101745
140.	<b>POL00102163</b>	Letter from Mr Hooper to Mr Bailey; re: Initial Complaint Review and Mediation Scheme	POL-0101746
141.	<b>POL00006574</b>	Sparrow Sub-Committee Minutes 18 Feb 2015	POL-0017848

142.	<b>POL00151290</b>	Email from Belinda Crowe to Patrick Bourke, Tom Wechsler, Mark Underwood re 260215 0934 Scheme Report (2).docx.	POL-BSFF-0010402
143.	<b>POL00151291</b>	POL Initial Complaint Review and Mediation Scheme Report.	POL-BSFF-0010403
144.	<b>POL00102245</b>	Email from Chris Aujard to Belinda Crowe, Alisdair Cameron, Mark Davies and others. Re: "Catch up call with Second Sight: Confidential and Privileged".	POL-0101828
145.	<b>POL00063428</b>	Susan Rudkin case study: File Note of meeting between POL and Second Sight 4/3/2015 at 1pm	POL-0059907
146.	<b>POL00022498</b>	Email from Mark Underwood to Melanie Corfield, CCing Belinda Crowe, Patrick Bourke, Tom Wechsler and others re Scheme Report Final	POL-0018977
147.	<b>POL00022499</b>	Post Office Complaint Review and Mediation Scheme Report	POL-0018978
148.	<b>POL00138190</b>	Email from Belinda Crowe to Lesley J Sewell, Angela Van-Den-Bogerd, Rodric Williams and others RE: Horizon	POL-BSFF-0000419
149.	<b>POL00138191</b>	Outline of points produced by Linklaters to explain Horizon and form a basis for a report to respond to public criticism and individual complaints by SPMs	POL-BSFF-0000420
150.	<b>POL00117519</b>	Email from Rodric Williams to Gareth James, Copying in Belinda Crowe, Chris Aujard and others. Re: Strictly Private & Confidential - Subject to Legal Privilege	POL-0115136
151.	<b>POL00117520</b>	Initial Complaint Review and Mediation Scheme DRAFT Fact file	POL-0115137
152.	<b>POL00117521</b>	A table of the themes which underlie some of the allegations that Horizon is deficient	POL-0115138
153.	<b>POL00117522</b>	Post Office Mediation Scheme: Draft note re Outline of report on Horizon prepared by Linklaters LLP	POL-0115139

154.	<b>POL00117523</b>	Presentation: Horizon Core Audit Process - James Davidson	POL-0115140
155.	<b>POL00117542</b>	Description of Fujitsu's System of IT Infrastructure Services supporting Post Office Limited's POLSAP and HNG-X applications	POL-0115159
156.	<b>POL00138209</b>	Email from Belinda Crowe to Gareth James, Chris Aujard, Cdesourdy, Dtansley and others RE: Strictly Private & Confidential	POL-BSFF-0000438
157.	<b>POL00108462</b>	Letter from Deloitte LLP to Chris Aujard re: assisting Post Office Ltd litigation	POL-0106560
158.	<b>POL00138270</b>	Email chain from Gareth Jenkins to Chris Aujard, Rodric Williams, Belinda Crowe and others RE: Project Zebra	POL-BSFF-0000499
159.	<b>POL00138271</b>	HNG-X Review of Assurance Sources : Executive Summary Drafted by Deloitte	POL-BSFF-0000500
160.	<b>POL00328471</b>	Email from Gareth James to Lesley J Sewell, Chris Aujard, Rodric Williams and others RE: Updated Document	POL-0179472
161.	<b>POL00294440</b>	HNG-X Review of Assurance Sources : Executive Summary - Draft Drafted by Deloitte	POL-0170608
162.	<b>POL00147957</b>	Email chain from Belinda Crowe to Chris Aujard Re: Fwd.: Outline objectives, services and deliverables	POL-BSFF-0007080
163.	<b>POL00107160</b>	Deloitte , Horizon: Desktop Review of Assurance Sources and Key Control Features , Draft for Discussion, Version 16	POL-0105468
164.	<b>POL00149829</b>	Email from Melanie Corfield to Belinda Crowe, CC'd Patrick Bourke, Tom Weschler and Rodric Williams Re: Urgent BBC	POL-BSFF-0008947
165.	<b>POL00109547</b>	Email from Mark D Davies to Louise Chatfield re: Possible script	POL-0111065
166.	<b>POL00101712</b>	Email from Belinda Crowe to Mark R Davies re: BBC Today Programme	POL-0101295

167.	<b>POL00101728</b>	Email from Belinda Crowe to Melanie Corfield, Mark r Davies, Patrick Bourke and others re:Line	POL-0101311
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