

Tuesday, 7 May 2024

1
 2 (9.45 am)
 3 **MS PRICE:** Good morning, sir, can you see and hear us?
 4 **SIR WYN WILLIAMS:** Yes, thank you very much.
 5 **MS PRICE:** May we please call Ms Cortes-Martin.
 6 **SIR WYN WILLIAMS:** Yes.
 7 **BELINDA JANE CORTES-MARTIN (affirmed)**
 8 **Questioned by MS PRICE**
 9 **MS PRICE:** Can you confirm your full name, please,
 10 Ms Cortes-Martin?
 11 **A.** It's Belinda Jane Cortes-Martin.
 12 **Q.** Thank you for coming to the Inquiry to assist it with
 13 its work and for providing the statement that you have.
 14 As you know, my name is Emma Price and I will be asking
 15 you questions on behalf of the Inquiry.
 16 **A.** Yes.
 17 **Q.** You should have a hard copy of your witness statement in
 18 front of you; do you have that?
 19 **A.** I do.
 20 **Q.** It is dated 8 April 2024. If you could turn to page 53
 21 of that, please; do you have a copy with a visible
 22 signature?
 23 **A.** I do.
 24 **Q.** Is that your signature?
 25 **A.** It is.

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1 with when attending one of my first steering group
 2 meetings for Project Sparrow."
 3 **Q.** Thank you. With those corrections made, are the
 4 contents of your statement true to the best of your
 5 knowledge and belief?
 6 **A.** Yes.
 7 **Q.** That statement, for which the reference is WITN09910100
 8 is now in evidence and will be published on the
 9 Inquiry's website in due course. I will not be asking
 10 you about every aspect of the statement but, instead,
 11 taking you to some specific points which are addressed
 12 in it.
 13 I would like to start, please, with your
 14 professional background and the roles which you held
 15 with the Post Office?
 16 **A.** Yes.
 17 **Q.** I understand from your statement that you no longer have
 18 access to your CV but can you help, please, with what
 19 qualifications you hold, including any degree.
 20 **A.** I have an NVQ Level 6 in strategic management and two
 21 A-levels, and some O-levels. I can't quite remember how
 22 many.
 23 **Q.** You say at paragraph 4 of your statement that you were
 24 a civil servant for the majority of your working life?
 25 **A.** I was.

3

1 **Q.** I understand that, in light of documents recently
 2 disclosed to you, you have some corrections which you
 3 would like to make to your statement; is that right?
 4 **A.** Yes, it is.
 5 **Q.** Would you like to tell us what those are?
 6 **A.** In paragraph 9, line 1, change "full time" to "fixed
 7 term"; likewise, in paragraph 12, line 1, change "full
 8 time" to "fixed term"; and likewise in paragraph 42,
 9 line 2, change "full time" to "fixed term".
 10 In paragraph 24, after the final sentence, add in
 11 a new sentence, which says:
 12 "Having reviewed the documents provided in the
 13 second bundle, specifically E42, which is POL00349472",
 14 I can see I had previously raised what seems to be
 15 a similar point in October 2014 but I cannot recall
 16 whether or how this matter was addressed.
 17 And in paragraph 85, line 15, that's at the top of
 18 page 42, after "understanding", add in "I see from
 19 POL00022240 that I disagreed with the approach suggested
 20 by lawyers in the introduction and sought the views of
 21 General Counsel".
 22 And, finally, in paragraph 60, line 4, after the
 23 word "attending" insert "one of" and add an "s" to
 24 "meeting", so the sentence should then read:
 25 "I believe that this was the impression I came away

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1 **Q.** So from 1979 to mid-2011; is that right?
 2 **A.** That's correct.
 3 **Q.** For the final two to three years, you were the
 4 Information Director for the Ministry of Justice. Can
 5 you help, please, with the type of roles you carried out
 6 as a civil servant prior to this?
 7 **A.** I -- a number of roles. I was manager, a manager in the
 8 Disability Living Allowance centre in Bristol, managing
 9 the throughput of Disability Living Allowance claims.
 10 I think that was my last operational role, or strictly
 11 operational role in the Civil Service and I then moved
 12 into policy, and I worked on tribunals policy, reform of
 13 the tax appeals process, I was the bill manager for the
 14 Gender Recognition Bill in -- I don't remember the date
 15 but sometime in 2006/7/8.
 16 Before I became Information Director I was Head of
 17 Information Policy in the Ministry of Justice. There
 18 would be other roles in that but I can't quite recall
 19 and I certainly can't recall the order of them.
 20 **Q.** Of course. What did your role as Information Director
 21 at the Ministry of Justice entail?
 22 **A.** So it was anything to do with information policy and
 23 practice. So I was responsible for libraries, records
 24 management, Data Protection policy, Freedom of
 25 Information policy, Freedom of Information operations

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1 within the Ministry of Justice, sponsorship of the
2 National Archive, sponsorship of the Office of the
3 Information Commissioner. There may have been one or
4 two other things that came within that but I don't now
5 recall.

6 **Q.** After leaving the Civil Service, you became
7 an independent consultant; is that right?

8 **A.** Yes.

9 **Q.** The majority of this work related to information
10 security?

11 **A.** Yes.

12 **Q.** You recall that it was in early 2012 when you were first
13 asked to carry out work for the Post Office; is that
14 right?

15 **A.** Yes.

16 **Q.** This followed an approach by the Chair of the Post
17 Office in late 2011?

18 **A.** Yes.

19 **Q.** Was the Chair at the time Alice Perkins?

20 **A.** It was, yes.

21 **Q.** You say you were asked to do work related to the
22 Government's proposals to mutualise the Post Office; is
23 that right?

24 **A.** Yes.

25 **Q.** You then had a meeting with Susan Crichton, General

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1 **Q.** What were you told in 2012, when you were in that first
2 Post Office role, about the issues facing the Post
3 Office at the time?

4 **A.** Do you mean specifically in relation to Horizon or more
5 generally?

6 **Q.** Were you given a briefing as to the priority issues for
7 the Post Office at the time?

8 **A.** Not to the best of my recollection. The challenge that
9 I recall facing the Post Office at the time was what
10 I think was called its Transformation Programme.
11 I don't remember the details of it but I think I needed
12 to be aware of that in the context of a mutualised Post
13 Office.

14 **Q.** Were you told anything at that time about challenges to
15 the Horizon system?

16 **A.** Not as far as I recall.

17 **Q.** Can we have on screen, please, paragraph 7 of
18 Ms Cortes-Martin's statement, that's page 3, please.
19 You say in the first sentence here:

20 "In or around October 2013 I was asked to move and
21 work within POL's Complaint Review and Mediation Scheme
22 (hereinafter referred to as the 'Scheme')."

23 Who was it who asked you to move and work within the
24 scheme; can you recall?

25 **A.** I don't recall specifically. I have assumed that Paula

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1 Counsel at the time, and Alwen Lyons, Company Secretary;
2 is that right?

3 **A.** Yes.

4 **Q.** You submitted a proposal for supporting the project,
5 which was accepted?

6 **A.** Yes.

7 **Q.** What did your role supporting the mutualisation project
8 entail?

9 **A.** It began with helping to -- Post Office formulate its
10 response to the Government's proposals for
11 mutualisation. I can't now recall whether or not --
12 I think the Government had issued its consultation
13 document relating to proposals to mutualise Post Office.
14 I don't think the Government had responded to the -- or
15 issued a report into its consultation. I think I was
16 helping but Post Office had to respond to it. So
17 I helped formulate that response, taking views from
18 across Post Office, and then, when Government published
19 its intentions on the back of its consultation or the
20 findings of its consultation, to work with the Post
21 Office to look at how mutualisation could be given
22 effect within the Post Office, specifically to run a --
23 I think we called it a stakeholder forum, which was
24 chaired by Paula Vennells, looking at the public purpose
25 of the Post Office.

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1 or somebody on Paula's behalf would have spoken to me
2 about it but I don't have a recollection of specifically
3 being asked.

4 **Q.** Were you interviewed for the role?

5 **A.** No.

6 **Q.** You refer in this paragraph of your statement to
7 an email from Paula Vennells, summarising the role that
8 you took up in October 2013.

9 **A.** Yes.

10 **Q.** Could we have that on screen, please, it's POL00116179.
11 We can see here this is from Sarah Paddison but,
12 scrolling down, we can see it is, in fact, an email from
13 Paula Vennells, so sent on Paula Vennells's behalf.
14 A little up, please, just so we can see the date,
15 8 October 2013 and the subject is "Project Sparrow
16 steering group".

17 We can see here that you had been asked to provide
18 support to Project Sparrow in three ways. First, you
19 had a Secretariat role for the Complaint Review and
20 Mediation Scheme Working Group; is that right?

21 **A.** Yes.

22 **Q.** Second, you had a role being the main channel of
23 communication between the Chair of the Scheme Working
24 Group, so that was Sir Anthony Hooper -- is that
25 right --

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1 A. That's correct.
 2 Q. -- and the business?
 3 A. *(No audible answer)*
 4 Q. Third, and the third bullet point here, you had
 5 a distinct role providing strategic support and advice
 6 to Paula Vennells in her role as the Chair of the
 7 Project Sparrow steering group and it's said to be
 8 across all of the Project Sparrow workstreams; is that
 9 right?
 10 A. Yes.
 11 Q. What did you understand Project Sparrow's role and
 12 objectives to be when you first took up these roles?
 13 A. I think it's fair to say I wasn't sure. I would also
 14 say that, looking at this email, I think it was
 15 a general "This is what I think the role will be",
 16 because the scheme had just started but, to the best of
 17 my recollection, the only paperwork I received was any
 18 paperwork that would have been sent out in advance of
 19 the steering group meeting and I picked things up as
 20 I went along.
 21 Q. Did you understand, at the time you took up these roles,
 22 that your Secretariat to the Scheme Working Group role,
 23 in that role the support you provided was to be provided
 24 independently of any other role you carried out for the
 25 Post Office?

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1 things, actually, the way that I spent -- I wouldn't
 2 want to put a percentage on it right now, after all this
 3 time -- but I would say between 50 and 80 per cent of my
 4 time was just spent running the scheme, supporting the
 5 Chair and the Working Group.
 6 Q. Underneath the three bullet points in this email we have
 7 this:
 8 "separately, Belinda will also be helping to
 9 coordinate a short internal 'lessons learned' exercise
 10 on the process leading up to the publication of the
 11 Second Sight Report. We will discuss the approach to
 12 this in future steering groups but in brief the aim of
 13 the exercise will be to discuss collectively what
 14 insights the business can take from the experience."
 15 This is the Interim Second Sight Report, dated
 16 8 July 2013, being referred to here, is it?
 17 A. I assume so, yes.
 18 Q. What were you told at this stage about the process
 19 leading up to the publication of the Second Sight
 20 Report, the Interim Report?
 21 A. Very little. In fact, it was a source of some confusion
 22 to me as to what I should be covering in the lessons
 23 learned. It became clear that there had been some
 24 tensions within Post Office about -- around this time.
 25 Those tensions, I think, had included a tension which

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1 A. In so far -- just to make sure that I'm clear about the
 2 question, it was definitely made clear to me that
 3 I should do what the Chair asked of me and what the
 4 Working Group asked of me and should not, in any way,
 5 diverge from that in order to serve a different purpose
 6 for the Post Office.
 7 Q. When you became involved in the scheme, did you see any
 8 difficulty at all with holding both the roles that you
 9 did, so with the Scheme Working Group, on the one hand,
 10 and the Project Sparrow advisory role?
 11 A. At the time I didn't.
 12 Q. Is your answer different today?
 13 A. Having reviewed the documents and understanding what
 14 I now understand of what has arisen subsequently, I feel
 15 some discomfort because I can see how it looks different
 16 but, at the time, I didn't feel any real tension and
 17 I was never under any pressure from Post Office to, in
 18 any way, to the best of my recollection, favour Post
 19 Office in terms of my support for the Working Group and
 20 the scheme.
 21 I would go further, perhaps, and say that that would
 22 have been actively discouraged and that, although most
 23 of the papers that I have been provided with and,
 24 indeed, most of the questions I have been asked relate
 25 to issues to do with the closure of the scheme and other

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1 included Susan Crichton, who left at the time I was
 2 becoming involved in this. So I do recall being very
 3 clear, because this wasn't something that I had
 4 understood at all, that I was not prepared to do
 5 an exercise in who was to blame for whatever problem
 6 Post Office seemed to want to address through the
 7 lessons learned.
 8 In terms of the information I was given and,
 9 I think, when my report came out, it was more to do with
 10 Post Office's ability to set up a scheme at short notice
 11 or to set up a project at short notice and -- rather
 12 than anything to do with Second Sight's report itself.
 13 Q. What were you told about the reason for the Post
 14 Office's original instruction of Second Sight to conduct
 15 a review in relation to the Horizon IT system?
 16 A. That a number of MPs had approached either Paula or
 17 Alice, or both, expressing concerns about Horizon.
 18 I believe that, particularly, Alice, as a new Chair, was
 19 keen to engage in this at an early stage of her
 20 chairship and, as a result of her discussions with MPs,
 21 agreed to undertake an investigation into Horizon.
 22 Q. That document can come down now. Thank you.
 23 You say in your statement at paragraph 15 that you
 24 imagine you would have read the Second Sight Interim
 25 Report at some point after starting your work on the

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1 scheme.

2 **A.** Yes.

3 **Q.** Given that you were being asked to conduct a lessons
4 learned exercise on the process leading to the report,
5 would it be right to assume that you would have read the
6 report quite soon after taking up your role on the
7 scheme?

8 **A.** So I see from the documents that have been provided to
9 me, that I actually officially started on the scheme on
10 25 November but I was also provided with a document
11 exchange which Paula had copied me into, talking about
12 some cases that had been raised by Second Sight and, on
13 the email exchange, I think I say "I don't think I've
14 seen the report" or "Could somebody sent me the report
15 please", and I think this was early-ish in October. The
16 documents are in the bundle, I just don't recall the
17 detail.

18 **Q.** Yes, we will be going to that bundle, in fact. The date
19 on that document is October 2013.

20 **A.** Right.

21 **Q.** So, at October 2013, you don't think you had had it but,
22 presumably, if you requested it, you would have been
23 provided with it --

24 **A.** I'm sure.

25 **Q.** -- but do you recall being provided with it?

13

1 **Q.** How did the split between you and Angela van den Bogerd
2 work?

3 **A.** So the Business Improvement Programme was given to
4 Angela for -- to be Programme Director and everything
5 else -- at the time I don't know whether I fully
6 understood what everything else was -- but everything
7 else would come to me. The caveat around that was the
8 investigations into the specific complaints in the
9 scheme would be conducted by a team, actually, two teams
10 that were established by Angela. So, although the
11 investigations were relevant to the scheme itself, as
12 opposed to almost being tangential to it, Angela had
13 responsibility for the investigations and the cases and
14 I did not.

15 **Q.** That document can come down now, thank you. You say at
16 paragraph 8 of your statement that you completed your
17 outstanding work on mutualisation between October and
18 December 2013. Was that alongside your work on the
19 scheme and Project Sparrow?

20 **A.** Yes. So I think, to the best of my recollection,
21 Sir Anthony Hooper was appointed and was keen to have
22 a Working Group meeting. So my Secretariat
23 responsibilities started relatively quickly. In terms
24 of everything else, I would say, as the process
25 continued, it wasn't a straight cut-off point of

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1 **A.** I'm sure that's the case.

2 **Q.** By November 2013, you had been given the title of
3 "Programme Director of Project Sparrow"; is that right?

4 **A.** Yes.

5 **Q.** Could we have on screen, please, POL00137758. This is
6 a note of "Actions and Decisions from the Project
7 Sparrow Steering Group meeting [on] 12 November 2013".
8 At the meeting were Paula Vennells, Chris Aujard, Mark
9 Davies and Angela van den Bogerd, among others, and you.
10 Under point 4, please, we see this under "Roles and
11 responsibilities":
12 "Project Sparrow should be split to separate the
13 Mediation Scheme from Business Improvements. AVDB ..."
14 Is that Angela van den Bogerd?

15 **A.** Yes.

16 **Q.** "... to be Programme Director for the Business
17 Improvements Programme, BC ..."
18 Is that you?

19 **A.** Yes.

20 **Q.** "... to be Programme Director for Sparrow."
21 There's an action there:
22 "AVDB and BC to agree how the slipped will work with
23 CA."
24 Is that Chris Aujard?

25 **A.** Yes.

14

1 25 November; the mutualisation work ran down and the
2 mediation work ramped up.

3 **Q.** What became of the proposal for mutualisation?

4 **A.** So, at that stage in the process, it was split between
5 the Communications Directorate, looking at the public
6 purpose of the Post Office, which would have been
7 an underlying statement of what the Post Office stood
8 for, and then the strategy to mutualise the Post Office
9 stayed with strategy group, where it had sat when I was
10 working on it.

11 **Q.** You then started a fixed-term contract, which made you
12 an employee of the Post Office; is that right?

13 **A.** That's correct.

14 **Q.** That was on 1 January 2014?

15 **A.** Yes.

16 **Q.** You've corrected in your statement the reference to
17 "full time" to "fixed term"?

18 **A.** Yes.

19 **Q.** Were you working full-time hours?

20 **A.** Yes.

21 **Q.** You say at paragraph 11 of your statement that you also
22 provided a support function for the new Post Office
23 General Counsel, Chris Aujard; what did this role
24 entail?

25 **A.** So this was specifically to assist him in meeting any

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1 requests from either the Working Group or the Board in
2 the general area of work which fell into -- not
3 necessarily a direct result of the Mediation Scheme, but
4 any issues that the -- particularly the Post Office
5 Board wanted to address in order to inform any decisions
6 they wanted to make to the scheme. It was a pulling
7 together of anything that he needed pulling together
8 that was in any way related to matters relating to the
9 scheme.

10 **Q.** Is it right that your fixed-term contract with the Post
11 Office ran until 31 March 2015 --

12 **A.** That's correct.

13 **Q.** -- at which point you retired?

14 **A.** Yes.

15 **Q.** I'd like to turn, please, to your knowledge of bugs,
16 errors and defects and your understanding of their
17 significance, not now but at the time that you were at
18 the Post Office.

19 **A.** Yes.

20 **Q.** At paragraph 15 of your statement, you say that you were
21 not aware of the abbreviation for bugs, errors and
22 defects, that is "BEDs", during your time within Post
23 Office. You do recall, though, being aware of the
24 matters raised in the Interim Second Sight Report of
25 July 2013; is that right?

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1 a situation where timely, accurate and complete
2 information about the status of a transaction is not
3 immediately available to a [subpostmaster];

4 "(d) When individual [subpostmasters] experience or
5 report problems, POL's response can appear to be
6 unhelpful, unsympathetic, or simply fail to solve the
7 underlying problem. The lack of a 'user forum' or
8 similar facility means that subpostmasters have little
9 opportunity to raise issues of concern at an appropriate
10 level within [Post Office Limited];

11 "(e) The lack of an effective 'outreach'
12 investigations function within POL, results in POL
13 failing to identify the root cause of problems and
14 missing opportunities for process improvements;

15 "(f) The end of Trading Period processes can be
16 problematic for individual [subpostmasters],
17 particularly if they are dealing with unresolved
18 Transaction Corrections. The lack of 'suspense account'
19 option means that it is difficult for disputed
20 [transaction corrections] to be dealt with in a neutral
21 manner."

22 Then going back, please, to paragraph 6.4 on page 5.
23 This is under the section on whether defects in Horizon
24 caused some of the losses for which subpostmasters or
25 their staff were blamed. It says at 6.4:

19

1 **A.** Yes.

2 **Q.** You also say at that paragraph that you became aware of
3 such issues being raised by the Justice for
4 Subpostmasters Alliance, as well as applicants in the
5 scheme?

6 **A.** Yes. Not specifically related to bugs but just concerns
7 about the Horizon system.

8 **Q.** Looking, please, to the Interim Second Sight Report
9 itself, could we have that on screen, please. It's
10 POL00099063. We can see the title there "Interim Report
11 into alleged problems with the Horizon system". Then
12 going, please, to page 8. Towards the bottom we have
13 the date, 8 July 2013, and the redacted signatures of
14 Mr Henderson and Mr Warmington.

15 The preliminary conclusions are set out above at
16 8.2, and these were as follows:

17 "(a) We have so far found no evidence of system wide
18 (systemic) problems with the Horizon software;

19 "(b) We are aware of 2 incidents where defects or
20 'bugs' in the Horizon software gave rise to 76 branches
21 being affected by incorrect balances or transactions,
22 which took some time to identify and correct;

23 "(c) Occasionally an unusual combination of events,
24 such as a power or communications failure during the
25 processing of a transaction, can give rise to

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1 "In the course of our extensive discussions with
2 [Post Office Limited] over the last 12 months, [Post
3 Office Limited] has disclosed to Second Sight that, in
4 2011 and 2012, it had discovered 'defects' in Horizon
5 Online that had impacted 76 branches."

6 Over the page, please:

7 "The first defect, referred to as the 'Receipts and
8 Payments Mismatch Problem' impacted 62 branches. It was
9 discovered in September 2010 as a result of Fujitsu's
10 monitoring of system events (although there were
11 subsequent calls from branches). The aggregate of the
12 discrepancies arising from this system defect was
13 £9,029, the largest shortfall being £777 and the largest
14 surplus £7,044. [Post Office Limited] has informed us
15 that all shortages were addressed at no loss to any
16 [subpostmaster]."

17 Then the second defect is addressed at the next
18 paragraph, the "Local Suspense Account Problem",
19 affecting:

20 "... 14 branches, and [generating] discrepancies
21 totalling £4,486, including a temporary shortfall of
22 £9,800 at one branch and a surplus of £3,200 at another
23 (the remaining 12 branches were all impacted by amounts
24 of less than £161)."

25 It goes on to say that:

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1 "[The Post Office] was unaware of this second defect
 2 until, a year after its first occurrence in 2011, it
 3 reoccurred and an unexplained shortfall was reporting by
 4 a [subpostmaster].
 5 "[The initial investigations by the Post Office] in
 6 2012 failed to reveal the system defect and, because the
 7 cause could not be identified, the amount was written
 8 off. Fujitsu looked into the matter in early 2013 and
 9 discovered, and then corrected, the defect.
 10 "It seems however, that the shortfalls (and surplus)
 11 that occurred at the first occurrence (in 2011) resulted
 12 in branches being asked to make good incorrect amounts.
 13 "[The Post Office] has informed us that it has
 14 disclosed, in Witness Statements to English courts,
 15 information about one other subsequently-corrected
 16 defect or 'bug' in the Horizon software."
 17 Forgive me for taking you through that at some
 18 length but I'd just like to be clear about the issues
 19 that were being raised in the Interim Second Sight
 20 Report.
 21 **A.** Yes.
 22 **Q.** The report was, in fact, making reference to three
 23 defects, or bugs, in total, which Second Sight had been
 24 told about by the Post Office; would you agree?
 25 **A.** Yes.

1 was my understanding that Post Office believed that it
 2 had addressed the issues raised in the Second Sight
 3 Report satisfactorily and, therefore, beyond that, it
 4 continued to have confidence that Horizon was working as
 5 it should. Therefore -- and because these issues --
 6 these particular BEDs had been highlighted, publicised
 7 and addressed, my understanding within the Post Office
 8 was that almost there was a line drawn under that but,
 9 moving forward, there was a considerable level of
 10 confidence in the fact that Horizon was working as it
 11 should.
 12 **Q.** One of the preliminary conclusions that we've just been
 13 to was Second Sight raising concern about the Post
 14 Office failing to identify the root causes of problems.
 15 In light of that, did you not have any concern that
 16 there might be other defects or bugs -- using Second
 17 Sight's terminology -- that had not been discovered?
 18 **A.** At the time, no.
 19 **Q.** That document can come down now. Thank you.
 20 When you took up your role with the scheme and
 21 Project Sparrow in 2013, were you aware that the Post
 22 Office had brought prosecutions against subpostmasters
 23 and others privately, based on Horizon data?
 24 **A.** I was aware that Post Office brought prosecutions. The
 25 detail of that or more detail of how that worked -- for

1 **Q.** You say at paragraph 15 of your statement that you were
 2 not aware of concerns being raised within the Post
 3 Office about bugs, errors or defects, or a lack of
 4 integrity in the system but aren't these three defects,
 5 or bugs, identified by the Post Office to Second Sight
 6 an example of that: concerns being raised by the Post
 7 Office?
 8 **A.** Sorry, could you repeat the question?
 9 **Q.** Forgive me. That was a long question. In your
 10 statement, you say -- and if you'd like to go to it we
 11 can, it's paragraph 15 of the statement, which is
 12 page 6.
 13 I referred earlier to the sentence before this of
 14 becoming aware of such issues being raised by Justice
 15 for Subpostmasters Alliance and applicants in the
 16 scheme, and you say:
 17 "I was not aware of concerns being raised within
 18 [Post Office Limited] about BEDs [bugs, errors or
 19 defects] or a lack of integrity in the Horizon system."
 20 What I'm asking is those defects or bugs, which were
 21 referred to in the Second Sight Interim Report, having
 22 been raised by the Post Office, were they not an example
 23 or examples of concerns being raised within Post Office
 24 about bugs, errors or defects?
 25 **A.** I see. So, at the time I became involved in this, it

1 example, that Post Office was not a prosecuting
 2 authority, it was private prosecutions -- was something
 3 I became aware of a bit later. The actual evidence used
 4 in the prosecutions was not something that I was
 5 particularly aware of or particularly concerned myself
 6 with. It became the subject of discussions later,
 7 during the lifetime of the scheme between Post Office
 8 and Second Sight.
 9 **Q.** Were you aware when you took up the roles in 2013 that
 10 action was being taken against subpostmasters by the
 11 Post Office, including by way of civil claims and debt
 12 recovery actions, to recover shortfalls in agency
 13 branches?
 14 **A.** I certainly became aware of that during the first couple
 15 of months, I would say.
 16 **Q.** When you read the Interim Second Sight Report, did you
 17 recognise the significance of it for individuals against
 18 whom the Post Office had taken action?
 19 **A.** No. I read it by way of background, in terms of what
 20 had gone before, as opposed to particularly engaging in
 21 the detail. The only detail I engaged in was
 22 subsequently in relation to, I think, was Spot Review 5.
 23 But, beyond that, it was more by way of context for the
 24 work that I was involved in, as opposed to me being
 25 involved in any sort of investigation of the issues.

1 Q. Could we have on screen, please, POL00302417. This is
 2 an email from, if we can scroll down a little, Angela
 3 Tanner, Stakeholder Correspondence Team. Can you help
 4 us with that team; what was that team's role?
 5 A. I think that was just the team that dealt with any
 6 lessons -- sorry, any correspondence that came into Post
 7 Office generally.
 8 Q. This was sent to you, copied to Angela van den Bogerd,
 9 along with one other. It is dated 27 February 2014 and
 10 it reads:
 11 "Hi Belinda
 12 "Please find attached a letter sent to Paula
 13 regarding Horizon integrity concern. I have spoken to
 14 Gayle today, and she has advised me that you are the
 15 person to help me. The letter is from Oliver Heald QC
 16 MP on behalf of Mrs Jasvinder Barang, who was
 17 a subpostmaster until her contract was terminated due to
 18 fraud. [She] believes that there was [an] issue with
 19 the Horizon system and would like her case to be
 20 considered under the Mediation Scheme. Both Oliver Head
 21 MP [sic] and [the subpostmistress] are aware the closing
 22 date was November.
 23 "Not sure if this case can be looked into? Can you
 24 please advise what we can do?"
 25 Do you recall this case being referred to you at
 25

1 passed immediately to Angela.
 2 Q. Should we understand from that that you were not
 3 involved in any investigation of the facts of this case
 4 or --
 5 A. No.
 6 Q. That document can come down now. Thank you.
 7 You have addressed the Helen Rose Report in your
 8 statement at paragraphs 80 to 83. If you wish to refer
 9 to those paragraphs, do. In particular, you have
 10 referred to email correspondence from April and June
 11 2014, in which the report was addressed. Your evidence
 12 at paragraph 80 is that you believe you became aware of
 13 the Helen Rose Report in 2014 but you do not think you
 14 appreciated at the time the extent to which the contents
 15 of it may have been important to subpostmasters who had
 16 been convicted of relevant offences, on the basis of
 17 Horizon data; is that right?
 18 A. I'm sorry, could you take me to the paragraph again?
 19 Q. Of course. It's paragraph 80.
 20 A. 80, 8-0? I apologise.
 21 Q. Yes, it's page 39.
 22 A. Yes, yes.
 23 Q. So you say:
 24 "I believe that I became aware of the Helen Rose
 25 Report at some point in 2014, although I do not recall
 27

1 all, given it was referred via an MP?
 2 A. No.
 3 Q. Can you help with why you would have been the person to
 4 help?
 5 A. Because it related to a potential late application to
 6 the scheme and I was the Secretariat to the scheme.
 7 By -- at that point the scheme had closed to new
 8 applicants and I can't recall the point at which there
 9 might have been a change of process but, initially, we
 10 did have some late applicants -- applications to the
 11 scheme and they came sometimes through correspondence to
 12 the Post Office, sometimes through correspondence to
 13 Second Sight, and my job as Secretariat to the Working
 14 Group would be to put them on the agenda for the Working
 15 Group, for the Working Group to make a decision as to
 16 whether or not the cases should be admitted.
 17 As the -- after a period of time, I think the --
 18 that the working group had decided that late
 19 applications should not be accepted but the cases would
 20 be passed to Angela van den Bogerd to investigate as
 21 part of her 'business as usual' processes. So the
 22 reason I explained that is I can't recall this case and
 23 I don't know whether or not I would have put it as
 24 an agenda item for the Working Group or, by that time,
 25 the Working Group would have decided that it would be
 26

1 exactly when. Following my review of the report and the
 2 email correspondence around the matter, I do not think
 3 I appreciated at the time the extent to which the
 4 contents of it may have been important to those
 5 subpostmasters who had been convicted of theft, a fraud
 6 offence or false accounting, on the basis of data
 7 generated by the Horizon IT System."
 8 Could we have on screen, please, POL00148049, and
 9 page 3 of this document, please. About halfway down the
 10 page there's an email from Steve Darlington of Howe+Co,
 11 to Ron Warmington, dated 8 April 2014. The first two
 12 paragraphs of his email read as follows:
 13 "As Priti has stated in her last sentence we are
 14 seeking a stay on the time limits on all cases under
 15 review due to the implications of [Post Office
 16 Limited's] non-disclosure of system-generated
 17 transactions and Horizon's integrity issues.
 18 "The 'Helen Rose Report' is of critical significance
 19 to all cases. The information contained within it is
 20 a compelling case for such a stay in its own right.
 21 When combined with the Andy Winn/Alan Lusher email in
 22 the case of Ward which explicitly states that Fujitsu
 23 can remotely change the figures in the branches without
 24 the [subpostmasters'] knowledge or authority, the case
 25 for a general stay is overwhelming."
 28

1 We will come back to the second point being raised
 2 here, and that being the point of the case of Ward and
 3 the email referred to, but sticking now with the Helen
 4 Rose Report, scrolling up to the email above, please, we
 5 can see here Mr Warmington forwarding Mr Darlington's
 6 email to you, proposing this for that week's Working
 7 Group call; do you see that?
 8 **A.** Yes.
 9 **Q.** Then scrolling up again, we see that you forward the
 10 email from Mr Warmington on to Angela van den Bogerd,
 11 Andrew Parsons, Andy Holt and Rodric Williams, also on
 12 8 April 2014, and that email was copied to Chris Aujard
 13 and David Oliver. You say this:
 14 "Please see below. Not yet decided about whether to
 15 postpone this week's WG call but does anyone know
 16 anything about the email being quoted below about remote
 17 alteration of the figures in branch? I think this one
 18 is new on me."
 19 As I say, we'll come back to that:
 20 "Andy P, can we please chase CK ..."
 21 Cartwright King, was that?
 22 **A.** Yes.
 23 **Q.** "... for a response on the Rose report point."
 24 Do you recall this coming to your attention in this
 25 way, the Rose Report reference, looking at these
 29

1 concern was not with the data's accuracy but that the
 2 presentation of the data could be misleading if its
 3 limitation were not fully understood. Putting this
 4 issue aside, the real (and confidential) reason that the
 5 report was disclosed was because Helen's comment at the
 6 bottom of page 3 suggests that it was widely known that
 7 there were problems with Horizon. This statement
 8 (regardless of whether it is correct) could have been
 9 used to attack Gareth Jenkins' credibility as [Post
 10 Office Limited's] Horizon expert as he had previously
 11 stated that there were no problems with Horizon."
 12 So Mr Parsons is flagging up, is he not, that the
 13 Helen Rose Report had implications for the credibility
 14 of Gareth Jenkins?
 15 **A.** He is and I can now see that. At the time, that is not
 16 the way that I would have read this email, to the extent
 17 with which I would have engaged with the detail.
 18 **Q.** At the time, did it concern you at all, that particular
 19 aspect in relation to Gareth Jenkins' evidence?
 20 **A.** No.
 21 **Q.** Could we have on screen, please, POL00202810. This is
 22 an email from Andrew Parsons to you, dated 9 April 2014,
 23 so the next day.
 24 I appreciate this is a document which has only been
 25 provided to you very recently. Have you had a chance to
 31

1 documents?
 2 **A.** From reading these documents, I assume that the issue of
 3 the Rose Report had arisen previously and I had asked
 4 Andy Parsons for, presumably, some briefing to ensure
 5 that Chris Aujard and Angela had what they would require
 6 for any discussion at the Working Group.
 7 **Q.** Could we have on screen, please, POL00029707. This is
 8 an email later on 8 April 2014, from Andrew Parsons to
 9 you, among others, providing some information, having
 10 spoken to Cartwright King, and he addresses an issue in
 11 his email relating to redactions applied to the report
 12 before providing some background information in his
 13 penultimate paragraph on the Helen Rose Report. He says
 14 this:
 15 "Just for background information, the material part
 16 of the Helen Rose Report has nothing to do with her
 17 comments about reversal data. SS ..."
 18 Is that Second Sight?
 19 **A.** Yes.
 20 **Q.** "... and Howe [being Howe+Co] are taking this point as
 21 evidence of a problem with the integrity of Horizon. In
 22 fact, Helen's issue was that the Credence data, although
 23 accurate, did not on its face distinguish between
 24 automated reversals and user generated reversals. This
 25 information is available but in a different report. The
 30

1 read through it or do you want to take a moment to just
 2 read through now?
 3 **A.** No, that's fine.
 4 **Q.** It reads as follows, Andrew Parsons to you, copied to
 5 David Oliver:
 6 "Belinda
 7 "FYI below and attached -- this is the original
 8 Helen Rose Report and the original email chain. I can't
 9 find anything after this in our records as I think that
 10 Rodric took over from this point. Clearly at some point
 11 this document went to [Cartwright King] and [Cartwright
 12 King] produced the attached advice in July 2013 that
 13 triggered the disclosures of the report to some
 14 convicted [subpostmasters]."
 15 There are two attachments to the email that we see.
 16 Just under the subject there, we can see "Attachments:
 17 Horizon data Lepton SPSO ... CONFIDENTIAL.docx", and
 18 then the second one, "GARETH JENKINS ADVICE", 15 July
 19 2013.
 20 The second one is the Simon Clarke Advice, Simon
 21 Clarke of Cartwright King, on the use of expert evidence
 22 relating to the integrity of the Fujitsu Services
 23 Limited Horizon system. Did you read the Rose Report
 24 itself when it was sent to you by Mr Parsons?
 25 **A.** I don't recall whether or not that was the point I read
 32

1 the Rose Report but, from the previous or from
 2 a previous email, I can see that I did read it because
 3 I queried some things in it and suggested that Chris
 4 needed briefing on it. But whether or not it was the --
 5 in response to the attachment to this, I don't know.
 6 **Q.** Did you read the Simon Clarke Advice of 15 July 2013
 7 when it was sent to you in this email?
 8 **A.** I have absolutely no recollection of that advice. I am
 9 quite surprised to see that here because, up until this
 10 point, I would have said I had no knowledge of it
 11 whatsoever.
 12 **Q.** You say you have no recollection of the advice. Would
 13 you have read the attachments to emails sent to you as
 14 a general practice?
 15 **A.** So I think it depends on the -- I think it depends on
 16 the context. So the -- my -- I would have considered my
 17 role to make sure that anybody that needed to know about
 18 anything in order to ensure that the work of the Working
 19 Group went smoothly and that they were properly briefed,
 20 so I commissioned briefing. I did not read everything
 21 that was sent to me. I suspect, because I have now read
 22 the Clarke Advice, because it's been published in
 23 various formats, I suspect I might have opened it and
 24 started to read it but not all of it, I think it's quite
 25 long, and I certainly would not have understood the

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1 comment --
 2 **A.** Yes.
 3 **Q.** -- reinforcing the point "I know you are aware of all
 4 the Horizon integrity issues".
 5 Then at (g):
 6 "No mention is made of any of these Horizon issues
 7 [those issues you set out above] in Dr Jennings' expert
 8 witness statements considered in this review ... Rather
 9 the statements attest to the robustness and integrity of
 10 Horizon."
 11 Then at (h), at the top there:
 12 "Had the existence of the bugs been disclosed by
 13 Dr Jennings in his expert witness statements then, in
 14 relation to any defendant who had raised Horizon issues
 15 as part of his/her defence case, that material '...
 16 might reasonably be considered capable of undermining
 17 the case for the prosecution ... or of assisting the
 18 case for the accused ...' and would undoubtedly have
 19 required disclosure to such a defendant."
 20 Then at paragraph 38 -- at 37 above, Mr Clarke makes
 21 clear that:
 22 "... Dr Jennings' has not complied with his duties
 23 to the court, prosecution or the defence.
 24 At 38:
 25 "The reasons as to why [he] failed to comply with

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1 significance of it, particularly in view of the fact
 2 that I believed that Post Office had done everything it
 3 needed to assure itself had that its prosecutions were
 4 safe.

5 So this is something about which I would not have
 6 concerned myself and I would have assumed that it was
 7 being dealt with by the criminal lawyers who were
 8 experts in the area. But I don't think I read it.
 9 **Q.** Did you ask anyone about the Advice at all, at the time,
 10 what it was about?
 11 **A.** I had no recollection at all.
 12 **Q.** Mr Aujard's evidence was that he was aware of the Clarke
 13 Advice; did he ever raise it with you?
 14 **A.** No, to the best of my knowledge, no.
 15 **Q.** Could we have the Clarke Advice on screen, please. It's
 16 POL00006357. Going, please, to the last page, page 14,
 17 at the bottom we can see the date and the author. You
 18 say that you have now seen the Advice. Have you read it
 19 from start to finish now?
 20 **A.** Pretty much, yes.
 21 **Q.** I'd like to take you, please, to paragraph 36, that's
 22 page 12, and, without reading it all out, if you can
 23 just cast your eye down there. We see there at (e) the
 24 reference to Helen Rose's comment in her report, and so
 25 this is Simon Clarke explaining the significance of the

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1 this duty are beyond the scope of this review. The
 2 effects of that failure however must be considered", and
 3 he advised the following to be the position:
 4 "Dr Jenkins failed to disclose material known to him
 5 but which undermines his expert opinion. This failure
 6 is in plain breach of his duty as an expert witness.
 7 "Accordingly, Dr Jenkins Jenkins' credibility as
 8 an expert witness is fatally undermined; he should not
 9 be asked to provide expert evidence in any current or
 10 future prosecution.
 11 "Similarly, in those current and ongoing cases where
 12 Dr Jenkins has provided an expert witness statement, he
 13 should not be called upon to give that evidence.
 14 Rather, we should seek a different, independent expert
 15 to fulfil that role.
 16 "Notwithstanding that the failure is that of
 17 Dr Jenkins and, arguably, of Fujitsu Services Limited,
 18 being his employer, this failure has a profound effect
 19 upon [Post Office Limited] and [Post Office Limited]
 20 prosecutions, not least because by reason of Dr Jenkins'
 21 failure, material which should have been disclosed to
 22 defendants was not disclosed, thereby placing [Post
 23 Office Limited] in breach of their duty as a prosecutor.
 24 "By reason of that failure to disclose, there are
 25 a number of now convicted defendants to whom the

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1 existence of bugs should have been disclosed but was
 2 not. Those defendants remain entitled to have
 3 disclosure of that material notwithstanding their now
 4 convicted status."
 5 He goes on to explain he has:
 6 "... (... already advised on the need to conduct
 7 review of all [Post Office] prosecutions, so as to
 8 identify those who ought to have had the material
 9 disclosed to them. That review is presently under way).
 10 "Further, there are also a number of cases where
 11 there has been no disclosure where there ought to have
 12 been. Here we must disclose the existence of the bugs
 13 to those defendants where the test for disclosure is
 14 met.
 15 "Where a convicted defendant or his lawyers consider
 16 that the failure to disclose the material reveals
 17 an arguable ground of appeal, he may seek the leave of
 18 the Court of Appeal to challenge his conviction."
 19 At 39:
 20 "In an appropriate case the Court of Appeal will
 21 consider whether or not any conviction is unsafe. In
 22 doing so they may well enquire into the reasons for
 23 Dr Jenkins' failure to refer to the existence of bugs in
 24 his expert witness statements and evidence."
 25 Were you aware of the issues, set out in the

1 accuracy and veracity of the information I was given.
 2 The reason I don't believe that I saw this is that
 3 I did continue to insert into briefing comments about
 4 Post Office's confidence in the safety of its
 5 convictions -- sorry, its prosecutions, and I can't
 6 imagine that I would have done so, had I read this, at
 7 least without having asked a question about it.
 8 **Q.** Going back to the email traffic on the subject of the
 9 Helen Rose Report, please, and how it was to be referred
 10 into investigation reports for the scheme, could we have
 11 on screen, please, POL00129392. Towards the bottom of
 12 page 2, please, this is an email from Andrew Parsons,
 13 dated 17 June 2014. It is to Chris Aujard, Rodric
 14 Williams, Jarnail Singh, Angela van den Bogerd and you,
 15 among others. He says:
 16 "I have just spoken with [Cartwright King] about
 17 a new CQR ..."
 18 Can you help with CQR? Is that one of the cases in
 19 the scheme?
 20 **A.** Sorry, I was trying to think of the -- I think it was
 21 the initial setting out of the complaint by an applicant
 22 in the scheme. I can't remember what CQR stood for but
 23 I think that's what it was.
 24 **Q.** "... from Howe+Co that references the Helen Rose Report.
 25 "You'll recall that the [Helen Rose] report was

1 paragraphs that we've just been to, at the time?
 2 **A.** No. I have to assume that I did not read it because --
 3 and, again, having looked at it with you here, even my
 4 lack of legal knowledge or lack of knowledge of criminal
 5 law would not have stopped me, I think, from at least
 6 asking what has happened in relation to this. So I must
 7 assume I didn't read it.
 8 I would -- and I struggle to understand why Andy
 9 would have sent it to me because disclosures and matters
 10 relating to disclosures was totally outside of my --
 11 outside of my brief.
 12 **Q.** Had you read it at the time, what would your reaction
 13 have been?
 14 **A.** Now?
 15 **Q.** Had you read it at the time.
 16 **A.** Oh, had it -- um -- so I would have questioned, I'm
 17 sure, of Andy, Jarnail certainly, and I also would have
 18 asked the question of Chris, that what had happened as
 19 a result of this? I would say that I took most things
 20 that were not within my direct line of responsibility at
 21 face value, in terms of what I was told. The reason
 22 I make that point is that, particularly not having any
 23 familiarity with the subject matter and in a big
 24 organisation, doing the job I was doing and also others,
 25 I was incredibly reliant on the completeness, the

1 retrospectively disclosed in a number of prosecution
 2 cases as it drew into question some of the statements
 3 made by [Post Office Limited's] expert witness, Gareth
 4 Jenkins. A copy of the [Helen Rose] Report has made its
 5 way to Howe who are now referencing it generally in
 6 their CQRs. For example, the CQR on M060 refers to the
 7 [Helen Rose] Report however the [Helen Rose] Report was
 8 not sent to this applicant.
 9 "The point of concern is that the M060 CQR is
 10 starting to make the link between (1) the fact that the
 11 [Helen Rose] Report makes clear that [Gareth Jenkins]
 12 knew of issues with Horizon and (2) the fact that
 13 [Gareth Jenkins] never mentioned these issues in his
 14 prosecution evidence (see paragraph 53 in the attached).
 15 This line of enquiry draws into question the credibility
 16 of [Gareth Jenkins'] evidence.
 17 "The sharing of the [Helen Rose] Report between
 18 applicants is potentially a breach of solicitors
 19 ethics/contempt of court. However, [Cartwright King]
 20 and I don't believe attacking the solicitors on this
 21 point would be of benefit -- if anything it may draw
 22 more attention to the [Helen Rose] Report.
 23 "Instead, our preferred approach is to try to
 24 downplay the importance of the [Helen Rose] Report in
 25 any [Post Office Limited] Investigation Reports. We

1 recommend minimalising or ignoring entirely the [Helen
2 Rose] Report when responding to CQRs.

3 "If the Investigation Team need guidance on how to
4 address any [Helen Rose] Report related questions,
5 I suggest that they (or the lawyer here at BD) addresses
6 these directly to [Cartwright King] on a case-by-case
7 basis."

8 Then he asks:

9 "Please let me know if you are happy with this
10 proposed approach?"

11 So, regardless of the Simon Clarke Advice, would you
12 agree that Mr Parsons was joining the dots in quite
13 clear terms, in relation to the implications of the
14 Helen Rose Report for the credibility of Gareth Jenkins?

15 **A.** Yes.

16 **Q.** In light of that, did you think his preferred and
17 recommended approach for cases in the scheme was
18 appropriate?

19 **A.** So, looking at the two things separately, because I have
20 considered and reflected on this email, the linking of
21 the Helen Rose Report with the credibility of Gareth
22 Jenkins' evidence, I did not -- now, as with the
23 previous email, now I read it again, I understand,
24 knowing what I now know, that the statement about
25 starting the point of concern is that M060 CQR, that is

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1 **Q.** In August 2013, Simon Clarke had cause to write
2 an advice which advised the Post Office on its duties to
3 record and retain material. In that advice, he referred
4 to having been provided with information to suggest that
5 there had been instruction by someone within the Post
6 Office that minutes of a conference call about Horizon
7 integrity should be shredded. Did anyone ever raise
8 that advice with you or that issue with you?

9 **A.** To the best of my knowledge, no.

10 **MS PRICE:** Sir, I wonder if that might be an appropriate
11 moment for the first morning break.

12 **SIR WYN WILLIAMS:** Yes.

13 But before we do, can I just ask you this: when
14 Ms Price was asking you questions upon the assumption
15 that you had read what I'll call the Clarke Advice, you
16 said that you thought, if you had read it, you would
17 have questioned Mr Parsons, Jarnail and Mr Aujard in
18 some way to understand its significance. All right?

19 **A.** Yes.

20 **SIR WYN WILLIAMS:** That's what you thought you would have
21 done.

22 **A.** Yes.

23 **SIR WYN WILLIAMS:** They are obviously all internal, if I can
24 put it in that way, to the Post Office?

25 **A.** Yes.

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1 far more significant than I realised at the time.

2 I suspect I would have skimmed over that.

3 The issue that is, I think, a matter of regret for
4 me is, among many, if I may say so -- but regardless of
5 my knowledge, regardless of my expertise or otherwise in
6 law or criminal law, I don't think an approach to try to
7 play down the importance of the Helen Rose Report is
8 satisfactory advice, and the reason for that and,
9 particularly, in terms of the spirit of the scheme, is
10 that, if it were not important -- and my assumption
11 throughout the whole of this time was that it was not as
12 important as it was being made to be -- and I accept
13 that that assumption is now proved to be incorrect --
14 that if it was not important, then that should have been
15 clearly stated in response to any reference to it in
16 a CQR, and the reasons why.

17 I wish and, indeed, on reflection, I should have
18 challenged that. Sorry, I can't say exactly why
19 I didn't do that but we very much, if you like,
20 segregated the matters with -- which we were dealing
21 with. So, insofar as I read this and engaged with it,
22 it would have been -- this was in advice to the
23 Investigation Team and I wasn't involved in the putting
24 together the investigation reports and I would not have
25 read a lot of the associated documentation.

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1 **SIR WYN WILLIAMS:** Would you have thought about what your
2 duty might have been, as the Secretary of the Scheme to
3 inform Sir Anthony Hooper as the Chair of the Working
4 Party about that document?

5 **A.** So all of the issues that arose in relation to Horizon
6 or, indeed, prosecutions, had a much wider application
7 than just those cases in the scheme. So I think I would
8 have wanted to understand the situation before I did
9 anything -- before I did anything wider. If I might
10 take your point slightly further, if I had read this and
11 add asked questions about it and was not satisfied with
12 the response I got, then I think Sir Anthony Hooper
13 would -- Sir Anthony Hooper, as opposed to going to the
14 Working Group, would have been the person that I would
15 have discussed this with.

16 **SIR WYN WILLIAMS:** All right. Thank you very much.

17 Yes, what time shall we start again, Ms Price?

18 **MR BEER:** 11.15 past, sir, I think is ten minutes.

19 **SIR WYN WILLIAMS:** Fine. Okay. Thank you.

20 **MS PRICE:** Thank you.

21 (11.04 am)

(A short break)

22 (11.15 am)

23 **MS PRICE:** Hello, sir, can you still see and hear us?

24 **SIR WYN WILLIAMS:** Yes, thank you.

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1 **MS PRICE:** Turning, please, to the issue of remote access to
 2 the Horizon system. You define remote access as "The
 3 ability of Fujitsu employees to alter transaction data
 4 or data in the branch accounts without the consent or
 5 knowledge of subpostmasters", and you address that at
 6 paragraphs 18 to 25 of your statement, that's page 7, if
 7 you want to have those paragraphs to hand.
 8 We have already looked at an email in which the
 9 issue of remote access was raised in April 2014 and that
 10 was the email from Steve Darlington, dated 8 April.
 11 Could we have that back on screen, please it's
 12 POL00148049.
 13 You'll recall because we read the email out earlier
 14 but, if we can scroll down, please, to the bottom email
 15 in this chain, so we can have it there -- that's it, the
 16 "Dear Ron" 8 April 2014 email -- this was the email
 17 which raised an email between Andy Winn and Alan Lusher
 18 in a case called Ward, which was said to explicitly
 19 state that Fujitsu could remotely change the figures in
 20 branch without a subpostmaster's knowledge or authority.
 21 This prompted Mr Warmington to propose this email, which
 22 also addressed the Helen Rose Report, for discussion at
 23 the Working Group weekly meeting.
 24 The bottom of page 2 of this document, please. We
 25 see your email, and it's the first sentence or paragraph
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1 "There are a few questions we need to answer,
 2 I think:
 3 "1. What is the explanation?
 4 "2. Has this statement been used publicly (in court
 5 or otherwise)?
 6 "3. Have the contents of this email been disclosed?
 7 Either:
 8 "a. Through the 'criminal' disclosure process, or
 9 "b. To Second Sight through response to Spot
 10 Reviews, or
 11 "c. As part of one of our investigations, or
 12 "d. To Second Sight in other [miscellaneous]
 13 material we have been provided in the past.
 14 "4. If this email has not been disclosed publicly,
 15 regardless of what our response is we need to consider
 16 how it came into Howe+Co's possession."
 17 Can you help, having posed these questions, with
 18 what further involvement in this particular issue you
 19 had, if any?
 20 **A.** So, looking at the documents that have been provided to
 21 me, on a couple of occasions between then and me leaving
 22 the Post Office, issues relating to this arose, and I am
 23 not able to see from the documents, and I have no
 24 recollection, of any continuing process. But in
 25 relation -- but to try to address it through the lens of
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1 here. You ask if anyone knows anything about the email
 2 being quoted below about remote alteration of figures in
 3 branch, and you say:
 4 "I think that this is a new one on me."
 5 Was that new to you at this point, then, the issue
 6 of remote access or was the thing that was new this
 7 particular email?
 8 **A.** I think the thing that was new was this particular
 9 email. My previous knowledge of the issues relating to
 10 remote access, as far as I recall, were specifically in
 11 relation to Spot Review 5, concerning a team at
 12 Bracknell which, allegedly, were altering transaction
 13 data without the knowledge of subpostmasters -- I think
 14 I'm paraphrasing there -- and this was an issue which
 15 cropped up on a number of occasions during my
 16 involvement with the scheme, and that was the lens
 17 through which I think I viewed everything relating to
 18 remote access.
 19 **Q.** Going to the top of page 1, please. This is your email
 20 of 14 April 2014. Three lines in, you say:
 21 "There are a few questions we need to answer,
 22 I think ..."
 23 This is in the context of the email, "Andy Parsons
 24 [was] going to speak to Andy Winn about it", in the
 25 sentence above. You say:
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1 how things worked at the time, this would have been me
 2 having been sent something and trying to do some sort of
 3 analysis of what the key issues might be, so that Andy
 4 Parsons could create a brief for Chris Aujard, so that
 5 he could have a conversation at the Working Group.
 6 And however unsatisfactory that might now feel to me
 7 and also seem now, a lot of my role was trying to pull
 8 things together to make sure that people could answer
 9 the questions they needed to. So I engaged, I'm afraid,
 10 more with the process than the detail.
 11 I don't remember checking the brief. I don't
 12 remember seeing the brief that Andy would have done and
 13 I don't remember any other activity specifically
 14 relating to this.
 15 **Q.** Could we have on screen, please, POL00091394. The first
 16 email in the chain starts towards the bottom of the page
 17 and is Jessica Barker, dated 13 October 2014. She
 18 forwards on to you, among a number of others, "revised
 19 draft CRR" in a case that was being looked at by the
 20 scheme. The timings of this email chain are a little
 21 confusing because your email above Jessica Barker's --
 22 Jessica Barker's is 11.46 and your email above of the
 23 same date is 10.59, so I'm not sure what's going on with
 24 the date stamps there but your email above appears to be
 25 a reply to Jessica Barker's email. Does that look right
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1 to you?

2 **A.** I imagine so.

3 **Q.** If we look at Jessica Barker's email scrolling down, we

4 have:

5 "Dear all

6 "Second Sight have released a revised version of

7 their draft CRR for case M053.

8 "Some background to this: you will remember that

9 [Second Sight] originally uploaded a draft CRR some

10 weeks ago [They have] produced a new draft CRR."

11 Then just explains what's attached to the email and

12 what the deadline for responses is.

13 Going further up, please, to your email above, which

14 would appear, would you agree, to be a reply to Jessica

15 Barker's email, it says:

16 "Is this the first which references remote access?"

17 **A.** Yes.

18 **Q.** "I think we need to pick this up very robustly in our

19 response as this could become public and Second Sight

20 seem to be asking for proof that something didn't

21 happen."

22 You say:

23 "Mel, could we dust off our lines on this as this

24 will be with the applicable and advisor tomorrow."

25 **A.** Yes.

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1 individual branch transactions -- there is no facility

2 at all within the system for this'."

3 Then Melanie Corfield says:

4 "I'll get a view from Fujitsu comms but let me have

5 any comments."

6 Did the existing line, being "This is not and has

7 not ever been possible", trouble you at all, on reading

8 this email, given that what follows seems to be

9 alternative, more fulsome lines?

10 **A.** So I think it depends on the question being asked. If

11 I could address that by way of what I picked up in

12 the -- I think it was the second bundle of documents

13 that were sent to me by the Inquiry. In October,

14 I think I was starting to get a little bit confused and

15 maybe concerned about the way that the issue of remote

16 access was being defined and, therefore, being answered

17 and, in fact, that was one of the amendments to my

18 statement, that I thought a wider piece of work needed

19 to be done -- I can't now remember the exact

20 terminology -- but to identify what the specific

21 questions were and then what the answers were because

22 I think many of us had in our mind something different

23 when we were answering the questions.

24 And I wasn't sure that we were turning our minds

25 specifically to what the point that needed to be

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1 **Q.** So you seem to have been aware of there being lines to

2 take on remote access before this; is that right?

3 **A.** Yes.

4 **Q.** The lines to take that you had in mind, where had they

5 originated from?

6 **A.** I don't recall.

7 **Q.** Melanie Corfield responds above, the same day, as

8 follows:

9 "Our current line if we are asked about remote

10 access potentially being used to change branch

11 data/transactions is simply: 'This is not and never has

12 been possible'.

13 "This line holds but if we are pressed regarding

14 [Second Sight's] points about 'admitting' there is

15 remote access etc, we can say: 'There is no remote

16 access for individual branch transactions'.

17 "We might get pushed further on it and get asked by

18 media to confirm whether or not there is any remote

19 access. We will need to make the distinction re access

20 as straightforward as we can so suggest: 'There is no

21 remote access for individual branch transactions.

22 Fujitsu has support access to the "back-end" of the

23 system used for software updates and maintenance. This

24 is of course strictly controlled with security processes

25 in place, but could not, in any event, be used for

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1 addressed was and, therefore, giving the correct answer.

2 **Q.** Could we have on screen, please, POL00149276. Going,

3 please, to the first email in this chain, which is

4 towards the bottom of page 1. The email from Melanie

5 Corfield to Andrew Parsons and Jessica Barker, dated

6 17 October 2014. The subject is "Remote access --

7 reactive statement -- in strictest confidence", and it

8 reads:

9 "Hi both

10 "A quick update because Fujitsu comms have come back

11 with revised wording -- I think they have made our

12 statement stronger so that is good, but I suspect

13 because there is (of course) some remote access so that

14 the system can be maintained etc Second Sight will

15 continue to pursue."

16 Then there are some lines underneath that:

17 "If we are asked about remote access potentially

18 being used to change branch transactions it is simply:

19 'The system is designed to prevent any access, either

20 remote or direct, that would allow individual branch

21 transactions to be altered'.

22 "If pressed further: 'The system has been designed

23 to prevent any access, either remote or direct, that

24 would allow individual branch transactions to be

25 altered. Fujitsu has controlled access to the Horizon

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1 system for software updates and maintenance purposes.
 2 This is of course strictly controlled with security
 3 processes in place, but could not, in any event, be used
 4 to alter individual branch transactions -- there is no
 5 facility within the system for this'."

6 As far as you can remember, was this email prompted
 7 by the particular case discussed in the 13 October email
 8 chain that we've just looked at?

9 **A.** I don't know.

10 **Q.** Going, then, to the reply from Andrew Parsons above,
 11 dated 19 October 2014, Mr Parsons says:

12 "Mel

13 "I'm just about comfortable with this. I understand
 14 that although [Fujitsu] cannot alter individual branch
 15 transactions, they can inject a transaction into
 16 a branch's accounts (though use of this facility is
 17 very, very rare) so we just need to keep being careful
 18 with any changes to the wording below until we get to
 19 the bottom of this."

20 This email is then forwarded to you, Patrick Bourke
 21 and one other, by Melanie Corfield -- so this is the
 22 first point at which you enter the email chain, at the
 23 top -- and it simply says, "As discussed".

24 Can you recall discussions around this at the time?

25 **A.** No.

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1 provided in response to questions put by Rodric Williams
 2 in April of that year; is that right?

3 **A.** Yes.

4 **Q.** A summary is provided of Fujitsu's response and the
 5 summary is:

6 "There is no ability to delete or change records
 7 a branch creates in either old Horizon or Horizon
 8 Online. Transactions in both systems are created in
 9 a secure and auditable way to assure integrity, and have
 10 either a checksum (old Horizon) or a digital signature
 11 (Horizon Online), are time stamped, have a unique
 12 sequential number and are securely stored via the core
 13 audit process in the audit vault."

14 Second point:

15 "Whilst a facility exists to 'inject' additional
 16 transactions in the event of a system error, these
 17 transactions would have a signature that is unique,
 18 subpostmaster IDs are not used and the audit log would
 19 house a record of these. As above, this does not delete
 20 or amend original transactions but creates a new and
 21 additional transactions."

22 Third point:

23 "This facility is built into the system to enable
 24 correction to be made if a system error/bug is
 25 identified and the master database needs updating as

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1 **Q.** This reactive statement, can you recall whether it was
 2 for use for a particular case, whether the M053 case or
 3 another, or more widely?

4 **A.** I can't recall and I don't remember the case, and
 5 I probably didn't read the case. I think it would have
 6 been for wider use, and I think it might have been, if
 7 the -- if a question was asked in relation to remote
 8 access on the back of the release of a case report to
 9 an applicant, the applicant or anybody associated with
 10 that applicant might have spoken to the press about it,
 11 if they thought it was significant, therefore having
 12 a position in relation to wider application.

13 **Q.** It seems that, after this email, you were then sent
 14 further information from Fujitsu. Could we have on
 15 screen, please, POL00349472. In the middle of the first
 16 page, we have an email from you, dated 20 October 2014,
 17 and you are responding to James Davidson's email of the
 18 same date, which starts at the bottom of this page?

19 **A.** Yes.

20 **Q.** If we can go over the page, please, we have this:

21 "Belinda,

22 "I found the response to Rod's note. Happy to
 23 discuss further, let me know."

24 Then there are some answers in the email below, just
 25 scrolling slowly down, please, which appear to have been

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1 a result, this is not a unique feature of Horizon."

2 Fourth:

3 "Approvals to 'inject' new transactions are governed
 4 by the change process, 2 factor authentications and
 5 a 'four eyes' process. A unique identifier is created
 6 and can be audited for this type of transaction within
 7 HNG-X, Horizon would require more extensive work to
 8 investigate, as explained below."

9 Going back, then, to your comments on this on the
 10 first page, and it's about halfway down there --

11 **A.** Yes.

12 **Q.** -- and this may be the email you were referring to
 13 earlier --

14 **A.** I think it is.

15 **Q.** -- when you said, "For information", sending this on to
 16 Melanie Corfield, Patrick Bourke, Angela van den Bogerd
 17 and Tom Wechsler:

18 "This is [Fujitsu's] response to a series of
 19 questions about what we are now, in my view, incorrectly
 20 badging 'remote access'.

21 "As we have discussed today, we need to set out in
 22 more detail what the position is and is not in relation
 23 to what can and cannot be done to Horizon data, by whom
 24 and under what circumstances.

25 "I will set something up to this effect with

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1 [Fujitsu] and others."

2 Were you aware at the time you were writing this
3 email, so in October 2014, that Deloitte had produced
4 a draft report for discussion in May of that year,
5 addressing, among other things, remote access, and
6 that's the report dated 23 May 2014, which I think you
7 were provided a copy of when you made your statement?

8 **A.** Yes, that would be under the heading of Project Zebra,
9 is that the --

10 **Q.** Yes, that's correct.

11 **A.** So I was aware of Deloitte being commissioned to provide
12 a report for the CIO at the request of the Board, as
13 I recall. I have no recollection of it specifically
14 addressing remote access or Deloitte being instructed to
15 consider the matter of remote access, so I didn't make
16 the link between this and that report.

17 **Q.** Moving to November 2014, please. Could we have on
18 screen POL00142406, starting, please, with the top of
19 page 2 of this document. There is an email from James
20 Davidson to you, dated 12 November 2014, and it's copied
21 to two others. The subject is "March 2010 -- Incident
22 Details", and Mr Davidson provides details about
23 an incident from that date. This was a document which
24 was sent to you by the Inquiry at the time you were
25 asked for a statement.

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1 I don't recall it from the time, although I do now
2 recall that one incident had arisen. But I hadn't
3 interpreted the way -- I hadn't interpreted it the way
4 that you are describing it. Reviewing it now, what
5 I have taken from it is that this was a system or
6 a change to a system that was being piloted in a small
7 number of offices and a subpostmaster had noticed an
8 issue, therefore the subpostmaster was aware, and the
9 subpostmaster's accounts were corrected with the
10 agreement and with the visibility of the subpostmaster
11 and, as it was a pilot, there were arrangements in place
12 to fix the issue, which I have assumed meant that,
13 before the system was rolled out, that the matter was
14 resolved and, indeed, the pilot had successfully
15 identified possibly more issues but successfully
16 identified and rectified this issue.

17 **Q.** It is fortunate, isn't it, that the subpostmaster
18 spotted the duplicate transaction in the first place
19 because, if it he hadn't and he'd had problems
20 balancing, might this not just have been another
21 unexplained shortfall case?

22 **A.** I can see, theoretically, that might have been the case.
23 I didn't think of it in that way but I accept that it
24 could have been the case. What I'm not clear about,
25 because I've not -- in fact, I've never even seen

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1 **A.** Yes.

2 **Q.** Have you had a chance to read through it?

3 **A.** Yes.

4 **Q.** I'll take it relatively quickly, therefore, but please
5 do say if you want me to slow down or go back to
6 anything.

7 **A.** Yes.

8 **Q.** The problem experienced by a subpostmaster was
9 a duplicate transaction being generated when the system
10 went offline unexpectedly, and that's the first
11 paragraph there under "Background". The subpostmaster
12 spotted it and called the helpline for assistance.

13 We can see in the timeline the accounts were
14 repaired by the insertion of auditable records into the
15 branch database to negate the duplicate transaction.
16 The fix was approved by the Post Office and, in this
17 instance, the subpostmaster was also told, so we can see
18 underneath there:

19 "Approved by [Post Office Limited] -- subpostmaster
20 informed."

21 But would you agree, having read this summary of
22 events, that this insertion could have been conducted
23 without the subpostmaster knowing about it or approving
24 it?

25 **A.** That wasn't the way that I had subsequently read it. So

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1 a Horizon screen -- I'm -- I don't know how obvious such
2 an issue would have been. So I accept that, if the
3 subpostmaster is part of a pilot, they would probably be
4 more alert and more diligent in terms of spotting things
5 because that would be part of the reason for a pilot but
6 I hadn't viewed it in the way that you describe.

7 **Q.** Looking, then, to your response to this email at the
8 bottom of page 1, please. So you forward this on, on
9 12 November 2014, to Patrick Bourke and Mark Underwood,
10 copied to Andrew Parsons, and you say:

11 "Details of the transaction inserted by [Fujitsu]

12 "Mark, could you please check the branch against
13 applications in the Scheme."

14 Then, going to the top of the page, please, still
15 12 November 2014, Mark Underwood replies and says this:

16 "Hi all,

17 "I am extremely pleased to say it does not relate to
18 any of the branches in the scheme.

19 "For information, below is the affected branch ..."

20 Why did you understand Mark Underwood to be
21 extremely pleased that this was not a scheme case?

22 **A.** I can't say that I understood it at all. I can
23 understand why I would have asked him or somebody to
24 look to see if it was a case in the scheme and, in view
25 of the fact that this issue had been identified, then

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1 I think we would have wanted to assure ourselves that it
 2 was properly explained in the -- in any Post Office
 3 response to the scheme and I would imagine that was my
 4 reason. I don't want to assume what Mark might have
 5 thought by trying to second-guess what was in his mind
 6 when he wrote that.

7 **Q.** Did you feel any relief that the incident did not relate
 8 to any of the branches in the scheme at the time?

9 **A.** I'm not sure that I had any feeling about it whatsoever,
 10 insofar as I had been reassured, I think, having --
 11 bearing in mind the previous emails, which talked about
 12 the possibility of transactions being inserted, which
 13 was something I had not turned my mind to, the fact that
 14 it appears to have happened once and that was during
 15 a pilot exercise, and the issue had been identified and
 16 rectified, I think I was reassured, rather than
 17 anything. But I would have wanted to -- I would have
 18 been concerned, had this case been in the scheme, and
 19 the -- this issue had not been correctly articulated.
 20 So, in that respect, I was -- I suppose I would have
 21 been pleased.

22 **Q.** Could we have on screen, please, paragraph 20 of
 23 Ms Cortes-Martin's statement, please, that's page 7.
 24 Towards the bottom of that page, you say here at
 25 paragraph 20:

1 The statement can come -- actually, if we can keep the
 2 statement on screen, please, and go to page 4 of it, at
 3 paragraph 10, you say:

4 "Although my job title was 'Programme Director', it
 5 became clear early on that I did not have any strategic
 6 responsibility or any final authority to make decisions
 7 in relation to the Scheme, and whilst I managed a small
 8 team of colleagues carrying out work in relation to the
 9 Scheme, I did not supervise or manage any other persons
 10 in managerial positions. Myself and my team were very
 11 much coordinators (as opposed to decision makers),
 12 carrying out the instructions and requirements of the
 13 Scheme Working Group (in my capacity as Secretariat),
 14 the Board, its subcommittee, and [Post Office Limited]
 15 General Counsel."

16 Should we take it from this that you consider your
 17 role as Programme Director of Project Sparrow was
 18 mistitled?

19 **A.** Yes. Sorry, can I clarify? I think in the first
 20 instance we established a programme board and I think
 21 that the title, at that stage, was correct. Some of the
 22 documentation that I have seen and from my recollection,
 23 I would have said a Programme Director or maybe
 24 a Programme Manager or Project Manager, but I think that
 25 would have been -- I think that would have been more

1 "The issue of 'remote access' was raised by Second
 2 Sight on a number of occasions during my time on the
 3 Scheme, but my understanding was that [Post Office
 4 Limited] considered that the matter had been addressed
 5 in its response to Spot Review 5 and, as far as I was
 6 aware, [Post Office Limited] and Fujitsu maintained the
 7 position that transaction data could not be changed
 8 remotely without the knowledge of a [subpostmaster]."

9 Is that an accurate description of your
 10 understanding at the time, notwithstanding that November
 11 2014 email?

12 **A.** Yes, I think, I think it is. For me, it's rather like
 13 a number of the other issues. I was reassured by people
 14 I spoke to that this issue arose as a result of
 15 Mr Rudkin's visit to Bracknell -- and, again,
 16 I understand now, with the benefit of hindsight and
 17 knowing what I now know, that this was a far more
 18 significant and broader issue -- and I viewed everything
 19 through that lens. The issue was whether or not
 20 transaction data could be changed remotely without the
 21 knowledge of a subpostmaster and, on the face of it,
 22 that was my understanding and that continued to be my
 23 understanding.

24 **Q.** I'd like to move, please, to Second Sight's role and how
 25 this was managed by those involved in Project Sparrow.

1 accurate. Subsequently, the governance for not the
 2 scheme but the entirety of the work that would have
 3 fallen within the programme changed, specifically when
 4 the Board set up a subcommittee and I think, by that
 5 time, the steering group had ceased to meet, I think,
 6 and but trying to run a programme board -- with a very
 7 small team to support a programme board --
 8 a subcommittee of the board, the board and the Working
 9 Group was far too much governance and so the programme
 10 board ceased to exist. As far as I can see it didn't
 11 meet after April.

12 So I think somewhere between maybe February and
 13 April it had become clear to me that this wasn't
 14 a Programme Director role in the normal scheme of
 15 things. So I -- in that respect, I think that is
 16 correct.

17 **Q.** You say at paragraph 31 of your statement that Paula
 18 Vennells chaired a steering group which oversaw the work
 19 of Project Sparrow. Did you ever raise your lack of
 20 strategic responsibility or final authority to make
 21 decisions with Paula Vennells at all? Was it something
 22 you were dissatisfied with?

23 **A.** No, it wasn't something that I was dissatisfied with.
 24 My -- actually, my recollection is that Paula had -- or
 25 somebody had asked me to provide the Secretariat to the

1 Working Group, so that was the email of 8 October,
 2 then -- and you've referred me to it during this
 3 session -- in November there was a meeting of the
 4 steering board and, actually, Paula announced at that
 5 meeting that I would be the Programme Director for
 6 Sparrow. I do not recall having had any conversation
 7 with anybody about that, prior to that meeting.
 8 I don't want to -- or I'm reluctant to attribute
 9 anything to anybody else but I think Angela might have
 10 been as surprised as I was by that announcement. I did
 11 not challenge that announcement but I wasn't
 12 disappointed or concerned when later it transpired that
 13 I would have been doing primarily what I had anticipated
 14 in the first place, and that is running the scheme and
 15 supporting the scheme.
 16 **Q.** Moving, please, to paragraph 30 of the statement, that's
 17 page 17, you say:
 18 "In terms of Project Sparrow, I am not aware of the
 19 background to its set up, as this was before my
 20 involvement in the Scheme. I do not recall if I was
 21 ever told its original remit."
 22 Once you became Programme Director for Project
 23 Sparrow, did you seek to further understand the
 24 project's genesis at all?
 25 **A.** No, I can't say I did. What I was more concerned about

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1 **Q.** Going back to page 1, please, we can see there the first
 2 heading is "Scope". You mentioned before your concern
 3 being what Project Sparrow would be going forwards. Was
 4 this you setting out your idea of what it would be or
 5 what it was?
 6 **A.** Yes, I think so. Yes.
 7 **Q.** There are said to be four workstreams falling within the
 8 scope of the project. There are, in fact, six main
 9 bullet points but, just looking to just the headings
 10 under there for the workstreams, the "Mediation Process
 11 and Working Group"; the "Review of criminal cases,
 12 (completed)"; "Disclosure"; "Development and
 13 implementation of intervention/prosecutions policy,
 14 including potential permanent 'complaints handling'
 15 arrangements"; "Final report for closure of the Project
 16 and the issue to enable return to BAU". Is that
 17 business as usual?
 18 **A.** Yes.
 19 **Q.** Then, finally:
 20 "Targeted business improvement, strictly limited to
 21 those parts of the processes which are specifically
 22 linked to the scheme."
 23 Just picking up on the review of criminal cases,
 24 what was your understanding of what the review referred
 25 to here was?

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1 was trying to define what it might be going forward
 2 because -- and I think this, if you like, summarises
 3 where I started on this, and that was that Second
 4 Sight's report had published in August. I --
 5 **Q.** July, I think.
 6 **A.** Sorry, July, and the scheme and Post Office's response
 7 to that had published in August and, therefore, my
 8 understanding was a line had been drawn under pretty
 9 much what went before and, therefore, I didn't concern
 10 myself too much with what had happened in the past.
 11 I was just looking at how things might be managed going
 12 forward.
 13 **Q.** On that, could we have on screen, please, POL00030694.
 14 This is a document entitled "Project Sparrow" and, going
 15 to the second page, please, we can see, about halfway
 16 down the page, the initials "BC"; are they your
 17 initials?
 18 **A.** They are, yes.
 19 **Q.** The date, 13 November 2013 --
 20 **A.** Yes.
 21 **Q.** -- so relatively shortly after you started in the roles
 22 but before the fixed-term contract started in January?
 23 **A.** And before I took over the role officially.
 24 **Q.** Is this a document which you authored?
 25 **A.** I think so, yes.

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1 **A.** That Post Office had an enduring responsibility in
 2 relation to its prosecutions and enduring responsibility
 3 of disclosure, I think was the terminology, as
 4 I understood it and, therefore, any issues that arose as
 5 a result of investigation into complaints on the scheme
 6 had to be considered in terms of whether or not any
 7 disclosure was required. There were a team of people or
 8 there was some people doing that in Cartwright King and
 9 that was an ongoing piece of work.
 10 **Q.** You've put in brackets here "completed", so was that
 11 your understanding, that the review of criminal cases
 12 was complete?
 13 **A.** Oh, so the review of criminal cases, yes.
 14 **Q.** Going, then, to "Success criteria", further down the
 15 page, please, at the fourth bullet point -- and I should
 16 say directly under the "Success criteria", we have a "By
 17 end April" as a goal. The fourth bullet point:
 18 "Second Sight involvement will have ended with:
 19 "[The Post Office] re-established as credible
 20 investigators of complaints (endorsed by [Second Sight])
 21 "Political support for completion of [Second Sight]
 22 involvement
 23 "JFSA neutral position on SS involvement."
 24 Did this reflect a view of the Post Office that
 25 Second Sight's involvement after the Interim Report

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1 should be limited to involvement in concluding the
 2 scheme, rather than any further investigation or
 3 reporting on Horizon, the Horizon system itself?

4 **A.** Yes. If I'm understanding your question correctly, my
 5 understanding was that the view within Post Office was
 6 that Second Sight's role changed following the
 7 publication of its report into one of reviewing
 8 investigation reports on complaints in the scheme.

9 **Q.** Where did your understanding on that come from?

10 **A.** I really couldn't say. I think, looking to timing of
 11 this document, I must have spoken to a number of people
 12 that had been involved to inform what it might look like
 13 and, therefore, that is something I would have picked
 14 up.

15 I see from the bundle of documents that I have been
 16 provided with that there was a reference, I think made
 17 by Andy Parsons, about a decision had already been made
 18 to remove Second Sight from the process but I don't
 19 think I ever found out where that originated. It seemed
 20 to have come from a conversation between Susan Crichton
 21 of Second Sight but, by this time, Susan Crichton, if
 22 she hadn't actually left, she was not in the office very
 23 much, so I never -- I don't think I ever got to the
 24 bottom of that. But I think, looking at the timescale
 25 here, this was, as it turns out, a hugely optimistic

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1 any pressure to restart them, it would not have been
 2 exerted on me and I was not aware of it.

3 **Q.** We saw in Paula Vennells' email announcing the roles you
 4 would be taking on -- and that was in October 2013 --
 5 that you had been asked to coordinate a short internal
 6 lessons learned exercise --

7 **A.** Yes.

8 **Q.** -- on the process leading up to the publication of the
 9 Interim Second Sight Report. It appears from the
 10 documents that you reported to the Audit, Risk and
 11 Compliance Subcommittee on this on 15 May 2014. Could
 12 we have those minutes on screen, please. The reference
 13 is POL00021426. We see here the minutes, 15 May 2014,
 14 and in attendance your name is there, "Programme
 15 Director Project Sparrow (Minute POLARC 14/23 only)".

16 Then going to page 4, please, about two-thirds of
 17 the way down the page we see a heading "Project Sparrow"
 18 with that reference on the left there, and "Belinda
 19 Crowe joined the meeting". So you were joining the
 20 meeting just for this specific item; is that right?

21 **A.** Yes.

22 **Q.** Then this at (b):

23 "The Committee received a report on lessons learned
 24 from the handling of the commissioning of the Second
 25 Sight investigation into Horizon and subsequent events."

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1 timescale that, by the end of April the scheme would
 2 have completed.

3 And, therefore, with the completion of the scheme,
 4 future investigations would be carried out by Post
 5 Office and Second Sight wouldn't be required to review
 6 them. So we would be into business as usual.

7 **Q.** The last bullet point on this page, says:

8 "New investigation/intervention/enforcement/
 9 prosecutions arrangements in place, announced (possibly
 10 in the 'final report') and operating fully. Potentially
 11 includes:

12 "Investigation arrangements
 13 "Intervention arrangements
 14 "Prosecutions policy
 15 "Permanent appeals/Mediation Scheme."

16 Did you understand it to be a Post Office priority
 17 to re-establish prosecutions of subpostmasters and
 18 others working in branch?

19 **A.** No, no, I didn't. I think -- my understanding is that
 20 prosecutions had ceased before I became involved in the
 21 scheme and, certainly, from the point of view of General
 22 Counsel, there didn't seem to be any rush to start them
 23 again, until this whole process had been completed. But
 24 that was just a perception. I couldn't tell you where
 25 that came from but, certainly, I didn't -- if there were

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1 Do you recall delivering this report now?

2 **A.** Yes.

3 **Q.** Casting your mind back, what were you told about why you
 4 were looking into lessons learned from this?

5 **A.** So I think I alluded to this earlier. It was quite
 6 tricky because I had felt that I was being asked to --
 7 I felt in the first instance I was being asked to look
 8 at whether or not someone was to blame for the fact that
 9 there was some confusion about the establishment of the
 10 scheme. The reason that I'm vague about it is because,
 11 at the heart of this -- and I'm choosing my words
 12 carefully because I don't know the circumstances, which
 13 is actually relevant here -- the heart of this was the
 14 departure of Susan Crichton and what I was keen not to
 15 get involved in is to get involved in any sort of
 16 apportionment of blame in relation to what might have
 17 led to her departure, not only because I wouldn't have
 18 been prepared to do that but because I didn't know what
 19 led to her departure.

20 My working assumption was that the decision to
 21 appoint Second Sight and undertake an investigation and
 22 then, at the end of the report, the decision to announce
 23 the establishment of a Mediation Scheme, and the
 24 involvement of JFSA and Second Sight, was felt to be
 25 decisions made by Paula and Alice with MPs, as opposed

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1 to necessarily engaging the wider business. That was
 2 what I understood to be at the heart of this and then,
 3 subsequently -- and this is the issue that I think
 4 I focused on, which I think is explained in the minutes
 5 here, subsequently, almost having made an announcement,
 6 because it was expedient to make an announcement, the
 7 Post Office then wasn't geared up to actually
 8 accommodating that announcement.

9 Therefore, to establish -- to announce the
 10 establishment of a scheme, without the people in place
 11 to support that scheme or having worked through the
 12 detail of that scheme, seemed to be creating a problem
 13 in the business. So, insofar as I can recall -- and
 14 I hadn't been provided with my paper but I think it was
 15 a very short paper -- avoiding any attribution of blame,
 16 because I didn't consider that was my role but to talk
 17 about the importance of engaging the business in
 18 business decisions and the importance of the business
 19 being able to respond in a way that was fleet of foot to
 20 anything that it wanted to do quickly.

21 **Q.** Is that what we see here at (c) in the summary, given in
 22 the minutes:

23 "It was noted that there was a need for a formal
 24 protocol for enterprise wide response to enable the
 25 Business to respond quickly and effectively to any

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1 **Q.** Why was it that an in-house team seemed to be sensible
 2 to those in the discussion, as opposed to an external
 3 team?

4 **A.** I don't know. I really don't know. I think, looking --
 5 so if it had been -- the ability to pull together
 6 a small team, such as the small team that I worked with,
 7 to deal with these issues, that would have been
 8 primarily in-house. I don't really -- I don't recall
 9 the discussion. I don't know that anything significant
 10 arose in the course of the discussion which said it had
 11 to be in-house. What I would say: that Post Office
 12 relied heavily on externals.

13 **MS PRICE:** That document can come down now.

14 Sir, I wonder if that's a convenient moment for the
 15 second morning break.

16 **SIR WYN WILLIAMS:** Yes.

17 **MS PRICE:** Thank you. It is 12.15 by my clock, which would
 18 take us to 12.25.

19 **SIR WYN WILLIAMS:** All right. Fine.

20 **MS PRICE:** Thank you, sir.

21 (12.12 pm)

(A short break)

23 (12.25 pm)

24 **MS PRICE:** Hello, sir, is the connection working as it
 25 should still?

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1 crisis, high risk or high profile issue. The Committee
 2 also discussed whether there was a need for
 3 an identified in-house team ready to deal with such
 4 issues."

5 **A.** That was at the heart of it and I think that was the
 6 only thing I could sensibly recommend.

7 **Q.** At (d) we see "It was agreed" -- is that it was agreed
 8 by the Committee:

9 "It was agreed that establishing such a team (or
 10 teams) would be sensible action, and that appropriate
 11 oversight by the CEO and/or the Board was important.
 12 The Committee also suggested that scenario planning
 13 should be considered, and a virtual crisis management
 14 team and support (lawyers, accountants, internal and
 15 external resources), be put together."

16 So was that, at subparagraph (d), recording the
 17 discussions that were had at the meeting, as opposed to
 18 your report?

19 **A.** Um, that was.

20 **Q.** Or was it --

21 **A.** That was recording the discussions at the meeting
 22 flowing from, I think, a discussion of my report because
 23 I think that was -- insofar as I can remember, I think
 24 that was a key feature, the ability to respond to issues
 25 quickly.

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1 **SIR WYN WILLIAMS:** Yes, it is, thank you.

2 **MS PRICE:** Ms Cortes-Martin you have already referred to
 3 your understanding of the Post Office's position that
 4 Second Sight's role changed after the publication of its
 5 Interim Report. Would you agree that there should have
 6 been an engagement letter clearly setting out Second
 7 Sight's role and responsibilities in relation to the
 8 scheme from the very get-go?

9 **A.** I would.

10 **Q.** It may be that you've already given your answer to the
 11 Chair on this, in response to different questions, but
 12 what is your understanding as to why this wasn't done?
 13 I appreciate it was before you started properly in the
 14 role.

15 **A.** Well, I think it was because -- and maybe this links to
 16 the lessons learned piece, and that was that the --
 17 there was a desire to follow up Second Sight's Report
 18 with an announcement very quickly and, again, I'm
 19 speculating and going on what my perception is, rather
 20 than any hard facts. And therefore, it was my view that
 21 not enough thought had gone into how this whole thing
 22 might work, going forward, which meant that I felt we
 23 were almost, if you'll forgive the terminology,
 24 retrofitting some stuff, and this was one such issue.

25 I have no idea whether or not anyone had

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1 a conversation with Second Sight about this and the
2 engagement letter was not seen as necessary, or whether
3 or not Second Sight's view changed. I have no idea of
4 the reason but -- why there were differing views but
5 I think there was a haste in announcing the scheme and
6 some components of it, which meant that some of the
7 basics weren't done.

8 **Q.** As Programme Director of Project Sparrow, what was your
9 understanding of Second Sight's mandate throughout the
10 period you held the role?

11 **A.** It was to produce -- and the terminology might have
12 changed as -- following Sir Anthony Hooper's arrival and
13 the scheme developing, which it did, but it was
14 primarily to review Post Office's investigations into
15 the complaints, and support the Working Group in
16 whichever way the Working Group wanted support from
17 Second Sight. So I think those were the two facets of
18 Second Sight's engagement.

19 **Q.** You say at the start of paragraph 58 of your
20 statement -- and we can go to it if that would help --

21 **A.** Thank you.

22 **Q.** -- that's page 28 of the statement, please. At the
23 start of paragraph 58:

24 "I have been asked if I at all considered there to
25 be a difference between what [Post Office Limited]

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1 create so much noise and to put in place processes that
2 we felt were closer to the way we wanted [the Post
3 Office] to be run (more supportive) going forwards. The
4 system that was in place at the time was when we were
5 a division of [Royal Mail] and accountable to their
6 Legal and Security Directors. Sparrow was our
7 opportunity to reset the dial for [the Post Office] as
8 a standalone business. We did not intend it to result
9 in major compensation for policies that were followed
10 and applied to thousands of others who did not have
11 problems, and which were operating in a different
12 corporate context. We seem to have lost this focus and
13 I am looking for advice on how we regain it. It should
14 be part of the [Second Sight]/TH pre-met in Monday. And
15 will be a question from the Board (Chris, Mark,
16 Belinda)."

17 What did you understand the message to be, coming
18 from Paula Vennells in this email, about the level of
19 compensation that she and Alice Perkins envisaged being
20 paid to subpostmasters at the outset?

21 **A.** That it was much lower than Post Office -- I think
22 informed by, I think, some Bond Dickinson or, if not,
23 some PA Consulting analysis -- were suggesting on the
24 basis of having looked at on some of the early
25 allegations and case questionnaires.

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1 stated publicly about the Mediation Scheme compared to
2 what was discussed internally. I do not recall thinking
3 that there was a difference, however, I do think that it
4 became clear once the Scheme got underway that [Post
5 Office Limited's] view of Second Sight's role and how
6 the Scheme would work differed from others' views, such
7 as JFSA and second Sight."

8 So, on this point about you not recalling
9 a difference between what was being stated publicly
10 about the scheme and what was discussed internally,
11 could we have on screen, please, POL00116285. This top
12 email is from Chris Aujard dated 23 February 2014 and is
13 providing comments in red on an email originally sent by
14 Paula Vennells to you, Chris Aujard and Angela van den
15 Bogerd, among others, on 21 February 2014.

16 So if we can just scroll up a little, please. We
17 can see there the 21 February email from Paula Vennells
18 to you and those others, that I've just mentioned.

19 **A.** Mm-hm.

20 **Q.** Going, please, to page 2 and 3.6, so the text in red is
21 that applied by Chris Aujard, the text in black is from
22 Paula Vennells, and at 3.6 it reads:

23 "Potential cost [and this is of the scheme] £10m+
24 serious. When we went into this, the motivation (Alice
25 and me) was to find out what was really going on to

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1 **Q.** What did you understand Paula Vennells to be seeking
2 from you and others in terms of a steer on what to do
3 about her concerns? What was she asking for advice on?

4 **A.** So I'm not overly clear on this but a couple of things
5 spring to mind and one is -- and this cropped up on
6 a number of occasions and, indeed, I think was a comment
7 made by CEDR that -- sorry, that was the mediation
8 company that were assisting us with mediations -- that
9 the -- this was established to be a mediation scheme and
10 not a compensation scheme and, yet, I think already
11 Paula and the Board were concerned that this was viewed
12 as a compensation scheme. So that was one point.

13 And the other, I think what she was trying to do was
14 to ask how we could get what seemed to her to be
15 a system that was getting out of control back in
16 control. Sorry, that's a rather vague answer but that's
17 the way it's reading to me.

18 **Q.** Did you give any advice in response to that paragraph in
19 particular?

20 **A.** I don't recall. I may have done, I don't recall.

21 **Q.** Does sight of that paragraph change the paragraph in
22 your statement we've just looked to in any way, as to
23 the difference between discussions internally and what
24 was being said publicly about the scheme, or not?

25 **A.** I don't think it does because I think -- and I think

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1 this is what Paula's saying, is: the original intention
 2 of the scheme, as she envisaged it, or she and Alice
 3 envisaged it, therefore presumably as announced, is
 4 changing. So, actually, maybe the opposite is true,
 5 that she is saying that what is happening in reality is
 6 slightly different to what the original intention was,
 7 which I think is why I did not feel that there was
 8 a difference between what was being said internally or
 9 externally.
 10 **Q.** That document can come down now. Thank you. Going back
 11 to Second Sight's role and attempts to put in place
 12 a letter of engagement in 2014, could we have on screen,
 13 please, POL00147169. Starting, please, with page 2,
 14 towards the bottom. We're looking for the 10 January
 15 2014 email from Ian Henderson to Chris Aujard, copied to
 16 Ron Warmington and to you, and the subject is "Proposed
 17 Engagement Letter". This is an email forwarding another
 18 email discussing the terms of Second Sight's engagement
 19 letter. The original email is on page 3, please, about
 20 halfway down. It is from Ian Henderson and it is
 21 6 January 2013, originally to Chris Aujard and copied to
 22 Ron Warmington. Going to page 4, please, under point 7,
 23 Mr Henderson wrote:
 24 "The proposed Scope of Services Schedule raises
 25 a number of issues that are at variance with assurances

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1 response to what he's saying?
 2 **A.** I think so, yes.
 3 **Q.** You write:
 4 "We need to consider carefully what and how we seek
 5 to fetter. SAH ..."
 6 SAH?
 7 **A.** Sir Anthony Hooper.
 8 **Q.** "... has made it clear that [Second Sight] can include
 9 what it wants so we need to treated carefully."
 10 What did you mean when you said "We need to consider
 11 carefully what and how we seek to fetter"?
 12 **A.** So I -- so, first of all, I've been sent several copies
 13 of the draft engagement letter and I can't guarantee
 14 I've related the exact one to the exact email. So I'm
 15 speaking in the abstract here. First of all, I would
 16 say that the -- commenting in this way, one doesn't
 17 necessarily expect that, some 10 years later, you're
 18 going to be asking questions about it. So I acknowledge
 19 that, in this and other emails, I have not chosen my
 20 words as I might have done, had I known this. But
 21 I think what I'm saying here is there must be something
 22 that Second Sight has objected to that makes it looks as
 23 though Post Office is trying to fetter it, and what I'm
 24 saying is we need to think carefully about the extent to
 25 which we do that. And, actually, it's nothing more than

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1 previously provided by [Post Office Limited] to both
 2 Second Sight and to the [Right Honourable] James
 3 Arbuthnot, MP. In particular, the Scope of Services
 4 Schedule attacks the fundamental principle that Second
 5 Sight operates completely independently of [Post Office
 6 Limited] and conducts its investigations and prepares
 7 reports as it sees fit."

8 So just stopping there, if we can go back to page 2,
 9 please, and to your email of 10 January 2014, and you
 10 request a meeting, you say:

11 "Ian
 12 "Chris has discussed this with me, and I understand
 13 you and he have spoken. Would it be possible for us to
 14 meet on Wednesday morning next week to discuss the
 15 engagement letter? We think possibly face to face is
 16 better if that works for you and Ron."

17 Then going, please, to the top of this page -- of
 18 page 1, forgive me -- so you forwarded this email thread
 19 to Andrew Parsons on 12 January 2014, and you say:

20 "I have made some comments in CAPS to the points SS
 21 have made."

22 So points in capital letters, and can we go to one
 23 of the comments, please, on page 4. So the comments
 24 made by Mr Henderson, that aren't in capitals, are we
 25 right to see the capital letters there as being your

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1 that, so don't try to fetter Second Sight in a way
 2 that's not appropriate, particularly in light of what
 3 Sir Anthony Hooper has said.
 4 I realise, looking at it now, it's not worded
 5 particularly well but I think that was all I was trying
 6 to do. I think what Post Office were trying to do was
 7 to tread a line between trying to do what clearly Paula
 8 and the Board wanted, and that was to keep the focus
 9 without any scheme without any difficulty without making
 10 it look as though Second Sight's independence was being
 11 fettered in any way.

12 **Q.** Can we have on screen, please, POL00199572. This is
 13 an email chain dated 13 January 2014, involving Alan
 14 Bates, Paula Vennells, you and others, regarding the
 15 scope of Second Sight's engagement. The initial email
 16 in the chain is on page 2, please, and this is from
 17 Mr Bates, and he wrote as follows, to Paula Vennells,
 18 13 January 2014, subject "Concerns":

19 "Hello Paula,
 20 "I am quite concerned about what I have been hearing
 21 recently about [Post Office Limited] trying to change
 22 the scope of the Scheme in order to restrict the terms
 23 of the investigation and stop certain matters being
 24 discussed. I should make it clear that JFSA signed up
 25 to the details as were discussed, and documented last

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1 July/August and alterations to what was agreed will
2 result in JFSA withdrawing from the Working Group and
3 the Scheme. I do not know if you are aware of what is
4 being proposed by the new [Post Office Limited] members
5 of the Working Group, but from what I can glean it seems
6 as if [Post Office Limited] are trying to hijack the
7 process which is something your Minister assured me
8 would not happen in her letter to me last September.

9 "I would be grateful if you would look into what is
10 happening at present. The impression I am getting seems
11 very different to the discussions we had last year."

12 Going, please, to the top of the chain, page 1. It
13 is an email sent by Sophie Bialaszewski --

14 **A.** I'm sorry, I never get it right myself.

15 **Q.** -- dated, again, 13 January 2014, and we can see her
16 role at the bottom of the email was Public Affairs
17 Manager for the Post Office. So this sent to Mark
18 Davies and Nina Arnott. She says:

19 "Thanks Mark. Had a quick chat with Belinda who has
20 picked up with Second Sight. Let's all keep each other
21 up to date with any news."

22 This email came through the day after the email we
23 just looked at, your email to Mr Parsons with the
24 reference to the fettering and the concern about that.
25 Was there anything in what Mr Bates was saying that the

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1 the terms of the investigation?

2 **A.** So, because my understanding also -- always has been
3 that the role of Second Sight was to focus on the cases
4 in the scheme, then the answer to that is no, and
5 I think I say in my statement that there is clearly --
6 and it became apparent throughout the process -- that
7 there were differing views on the role of Second Sight,
8 but I can't recall that Post Office's view ever changed
9 and I'm not sure that any of the original documentation
10 suggested that Second Sight's role was wider than the
11 cases in the scheme itself.

12 I haven't subsequently gone back and checked, so
13 I could be wrong in that.

14 **Q.** Could we have on screen, please, POL00029813. This is
15 an email dated 1 February 2015 from Rodric Williams to
16 you and other Post Office employees. He explains that
17 he is providing his comments on the "Difficult Questions
18 (Boxes)" document and the subject line in the email is
19 "Narrative boxes -- RW comments on the 'Difficult
20 Questions) Boxes' document".

21 Can you help, first of all, with what the "Difficult
22 Questions (Boxes)" document was?

23 **A.** I don't know but, looking at the timing, this may have
24 been to do with the questions and answers that were
25 being drafted for Paula for her appearance before the

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1 Post Office was trying to hijack the Post Office, from
2 your perspective?

3 **A.** I hadn't made the link. I don't know if I made the link
4 at the time. I didn't make the link when reading these
5 documents -- but could we just scroll down to Alan's
6 comments, please?

7 **Q.** Of course. That's page 2.

8 **A.** Right. So when I first read this, I thought this
9 related to something that had been discussed at
10 a Working Group meeting but that's not actually what
11 Alan is saying.

12 **Q.** What was the issue that was discussed at the Working
13 Group?

14 **A.** I can't recall, sorry. What I meant was that I thought
15 Alan -- because Alan did, on a couple of occasions,
16 write about concerns about the Working Group and
17 discussions at the Working Group but, looking at it
18 again, that's not exactly what he was saying. The
19 reality is I don't know but, in view of the fact that
20 I spoke to Second Sight, there is a distinct possibility
21 that Second Sight had spoken to JFSA and said that the
22 terms of engagement seemed to be limiting and,
23 therefore, I spoke to Second Sight about it. But I'm
24 speculating here. I just can't recall.

25 **Q.** As far as you're aware, was the Post Office restricting

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1 Select Committee. But that is just from looking at the
2 timing, that's the only thing I could think it might be.

3 **Q.** On page 2 of this document, point 8, there is a section
4 on Second Sight and, at the third bullet point here,
5 there is this:

6 "Re 'fettering' SS independence/challenging' SS's
7 findings -- this demonstrates their independence.
8 [Second Sight] make findings and recommendations, NOT
9 decisions. [Post Office] has always retained that
10 power."

11 Did you agree with Mr Williams' comments in relation
12 to this, that Post Office has always had the power of
13 decision?

14 **A.** So it's difficult to answer in the abstract because
15 I don't know the contents of the boxes. But I don't
16 know that Second Sight had any decision-making power in
17 relation to the Working Group or the cases. Does that
18 answer your question?

19 **Q.** It does and, in relation to the reference to
20 "fettering", which is in quote marks then, can you help
21 it all with where that comes from? It may be that you
22 can't, if you don't have the underlying --

23 **A.** I can't, apart from to say that I think it was a term --
24 so I don't think I introduced the term but I think it's
25 like many of the terms that we use, it was sort of

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1 shorthand for "Is Post Office trying to control Second
2 Sight". But, again, I'm trying to answer in the
3 abstract here and I don't think I can do that helpfully.
4 **Q.** I'd like to turn, please, to your involvement in the
5 substance of complaints in the scheme, or absence of
6 involvement.
7 Apologies, that document can come down before we
8 turn to the new topic.
9 You say at paragraph 33 of your statement -- and
10 would you like to look at that? That's --
11 **A.** Please, yes.
12 **Q.** -- page 17 of the statement, please, paragraph 33. You
13 say here:
14 "Nevertheless, whilst investigations into complaints
15 contained in Scheme applications technically fell within
16 the Scheme, I was not responsible for the substance of
17 those investigations. Angela was responsible for this
18 work because of her particular expertise and experience
19 in Horizon and the way the system worked, and she
20 managed the Investigation Team. My involvement in
21 investigations was limited to chasing the progress of
22 those investigations, along with progress of Second
23 Sight's reviews of the investigations in order to
24 effectively manage the progress of applications within
25 the Scheme."

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1 hopefully going to talk me through where we have made
2 improvements and where we still need to do more. I am
3 glad I've decided to make the trip -- we need to show we
4 are taking this v seriously."
5 Was Ms Vennells seeking your views on the substance
6 of these complaints by this email?
7 **A.** I can't imagine that she would have been, so looking at
8 the timing of this, I think my involvement in the scheme
9 had not been announced. I'm certain it wouldn't have
10 been -- sorry, I'm as certain as I can be because
11 I think that was the following week, 8 October. But
12 I think she was just giving me some information in
13 relation to the scheme that I was going to be involved
14 in. I don't think she had any expectation that I would
15 be either commenting on or involved in the detail.
16 What I would say is, I think this is the email
17 I referred to earlier where I asked to see a copy of the
18 report.
19 **Q.** We can go up and have a look at that now. So your
20 response is at the top and this is 3 October, from you
21 to Paula Vennells --
22 **A.** Yes.
23 **Q.** -- Martin Edwards, Mark Davies:
24 "Thanks Paula.
25 "Not easy to read on BlackBerry but I see your point

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1 Could we have on screen, please, with that in mind,
2 POL00099694. This is an email chain from October 2013,
3 so very early on, and the original email in this chain
4 is from Ron Warmington to Paula Vennells, and it starts
5 at the bottom of page 1. We can see the subject is
6 "Example Applications" there, to Paula Vennells, copied
7 to Angela van den Bogerd. He's sending, there, eight
8 examples of the incoming applications, presumably
9 incoming applications for the scheme?
10 **A.** I assume so.
11 **Q.** Going, then, to the middle of page 1, we can see Paula
12 Vennells forwards Mr Warmington's email on to Martin
13 Edwards, you and Mark Davies and she says this, in her
14 covering email, so this is Wednesday, 2 October:
15 "Dear all, I am not sure who else I want to read
16 these yet. But certainly the three of you.
17 "They make disturbing reading (I couldn't make sense
18 of spreadsheet but the individual submissions are
19 sufficient to get a steer on what we are dealing with).
20 "We have to keep it in perspective of course. But
21 even in perspective they are challenging from all sorts
22 of angles (Belinda these are examples of Sparrow cases
23 that have been submitted for consideration for
24 mediation).
25 "I'm with Angela tomorrow am. She and her team are

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1 from what I can see.
2 "I have not seen the Second Sight Report. Would
3 someone be able to send me a copy?
4 "I hope to catch up with Angela after you have seen
5 her today."
6 So this is, as you say, at an early stage but can
7 you recall why you saw her point that the information
8 sent had made for disturbing reading?
9 **A.** No. I'm afraid I can't.
10 **Q.** Did you get a sense at this stage of what it was that
11 Post Office Limited was dealing with?
12 **A.** I don't think so and I don't remember what I discussed
13 with Angela subsequently. So I'm afraid no, I can't
14 answer that question.
15 **MS PRICE:** Sir, it is nearly 1.00. I wonder if that's
16 a convenient moment to break for lunch.
17 **SIR WYN WILLIAMS:** Yes, can you give me some idea of the
18 timescale after lunch?
19 **MS PRICE:** Yes, I probably have another 20 minutes at most
20 and then there will be some questions from Core
21 Participants.
22 I will get an indication over the lunch period as to
23 how long they will be, sir.
24 **SIR WYN WILLIAMS:** Thank you very much. So 2.00?
25 **MS PRICE:** Yes, please, sir.

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1 (12.58 pm)

2 (The Short Adjournment)

3 (1.59 pm)

4 **MS PRICE:** Good afternoon, sir, can you see and hear us?

5 **SIR WYN WILLIAMS:** Yes, thank you.

6 **MS PRICE:** Good afternoon, Ms Cortes-Martin. I'd like to
7 continue, please, with questions relating to Second
8 Sight. Could we have on screen, please, POL00101978.
9 These are the minutes of a Project Sparrow Subcommittee
10 meeting on 12 January 2014. The minutes list you as
11 having been in attendance at that meeting.

12 **A.** Yes, excuse me, I don't think that that date is correct.

13 **Q.** Ah. I was going to ask you about that.

14 **A.** Oh, okay, sorry.

15 **Q.** Because my understanding was that it was April 2014 that
16 the inaugural meeting of the subcommittee happened?

17 **A.** I don't think it's then either. Just looking at the
18 attendee list ...

19 **Q.** I'm not suggesting that this document should be dated
20 April; I'm asking whether it seems odd that there was
21 already in January 2014 a formal subcommittee meeting of
22 Project Sparrow, as a subcommittee.

23 **A.** It is and I wondered whether or not it was actually
24 2014 -- sorry, 2015, but I could be wrong but it
25 definitely wasn't January 2014.

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1 it had been at least agreed with the Working Group,
2 therefore the business would have no ability to stop it
3 being produced.

4 **Q.** Why was there, if we can read this in this way, a desire
5 to stop the report from being produced?

6 **A.** I don't know. I can't explain that sentence in the
7 minutes, I can't imagine that the committee would
8 have -- why the committee might have thought that it was
9 possible.

10 **Q.** Did this wording cause you any concern at the time?

11 **A.** I don't know whether or not I would have seen the
12 minutes.

13 **Q.** But do you recall that sentiment being expressed during
14 discussion?

15 **A.** No, I don't. The only -- no, I don't.

16 **Q.** Could we have on screen, please, POL00116535. This is
17 an email chain from May 2014, which you are a part of.
18 The subject of the emails is "JA handling plan". Who is
19 the "JA" being referred to here?

20 **A.** I would imagine that's James Arbuthnot, now
21 Lord Arbuthnot.

22 **Q.** Take your time. If you need us to scroll down the
23 email. Perhaps if we can scroll down?

24 **A.** Could you just scroll down a bit.

25 **Q.** And a bit further, and if we can keep scrolling down,

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1 **Q.** I'm grateful. Going, please, to page 2 of this document
2 and (f) here -- and perhaps just going back to the
3 previous page to put this in context -- there is here
4 a section on the Initial Complaint Review and Mediation
5 Scheme and the committee had received a paper on the
6 current position.

7 Just casting your eye down (a) to (e) there, does
8 that help you at all with dating it and whether you're
9 correct that it is, in fact, 12 January 2015?

10 **A.** I think so. I wasn't involved in the -- that advice at
11 all. But my recollection is it was either the end of
12 2014 or beginning of 2015, from other documents that
13 I've been provided with.

14 **Q.** Thank you. Going over the page, please, to (f) we have
15 here:

16 "Post Office and an individual applicant -- thus
17 reducing the likelihood of a successful JR.

18 "The Committee discussed Second Sight and their
19 'Part Two' due to be finalised in April. The Committee
20 agreed that the Business was unlikely to be able to stop
21 this report from being produced."

22 Can you help with why the subcommittee reached the
23 conclusion that the business was unlikely to be able to
24 stop this report from being produced?

25 **A.** I think because it was a report that had been -- I think

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1 please, just to give the context of the email below.
2 You see there:

3 "What we need to factor into the above is:

4 "JA meeting with Paula ..."

5 Does that help?

6 **A.** It doesn't particularly but the only "JA" I can think of
7 is James Arbuthnot, I'm afraid.

8 **Q.** Can you help with why he would need handling?

9 **A.** Not a specific issue but Lord Arbuthnot, as he is now,
10 was considered to be a very important stakeholder and
11 anything that Post Office did in relation to Second
12 Sight or the scheme was considered in the context of
13 what and how to communicate that with James Arbuthnot.
14 So I think it was very important, particularly to Paula
15 and Alice, to -- for particularly the Comms Team to
16 advise on how to keep him on side -- or, put another
17 way, to endeavour not to do anything which might
18 potentially cause damage to the relationship with the
19 key stakeholder.

20 **Q.** Going, please, to one of the emails you wrote in the
21 chain on page 2, this is 5 May 2014, and remember you're
22 writing to David Oliver, copied to Mark Davies and
23 Sophie Bialaszewski, and you say:

24 "Sorry for long email but I've cut and paste the
25 Word doc into email as it's easier to edit on iPad."

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1 A little further down:
 2 "Re JA handling plan, cut and paste from
 3 Sophie/David's word doc.
 4 "I have just added a bit about positioning re SS
 5 [Second Sight]."
 6 **A.** Yes.
 7 **Q.** "It's aimed at trying to get JA to understand that
 8 whilst they *may* have been the right people to do the
 9 first bit, they seem to be out of their depth on the
 10 Scheme because of volume and also expectations. They
 11 are a small firm and appear to be struggling. I think
 12 overall the positioning should be that we need to keep
 13 the situation under review.
 14 "With apologies for having messed up the structure
 15 below, it doesn't quite work now but I think you will
 16 get the drift. Chris will need to agree what goes in
 17 the script but I think Paula needs to have the plan on
 18 Tuesday and agree it so we can stop JA issuing Paula's
 19 letter at least until she has had a chance to speak to
 20 him."
 21 So does that help with -- we see reference to
 22 a script; who was the script for?
 23 **A.** So the script would have been for Paula to use in
 24 a conversation with James Arbutnot, I think.
 25 **Q.** If we scroll down a little, please, underneath your
 97

1 addressed key issues.
 2 "They have now produced one report and a mediators
 3 fact brief about Horizon which [Post Office Limited]
 4 wrote for them. On the fact brief, apart from a bit of
 5 reordering, the only bit [Second Sight] added where
 6 assertions and non-evidence based opinion which the
 7 [Working Group] agreed should be removed.
 8 "[Second Sight] seem to be struggling. There is
 9 only three of them. Expectations are high among JFSA,
 10 SPMRs, MPs, etc that they will find something
 11 significant and they haven't. But if they produce
 12 a report which is critical of POL without evidence,
 13 [Post Office Limited] will, rightly, make that point.
 14 "They are looking well beyond Horizon to find
 15 something wrong -- POL cannot allow the scheme to stray
 16 into areas beyond Horizon.
 17 "Their stance is that they will keep investigating
 18 until they get to the truth. That seems to be something
 19 wrong with what [Post Office] has done."
 20 Just looking at those points that I've been through,
 21 do you think these were your additions?
 22 **A.** I can't recall. I think it's possibly more likely --
 23 more than likely that I would have endeavoured to change
 24 some of the wording, rather than add too much of
 25 substance but I'm afraid I can't recall.
 99

1 sign-off there, we have a number of headings "Current
 2 Situation", "Tactics", "Key messages". Then going down,
 3 a little further, please, we have "Script" there, and
 4 there are a number of bullet points there and, over the
 5 page, and under "Script" there's quite a lot dealing
 6 with Second Sight?
 7 Can you help at all with what in this was added by
 8 you and what you'd taken from this other Word document?
 9 It may be difficult at this remove.
 10 **A.** I'm afraid I can't -- is there any way to highlight it?
 11 **Q.** How about if I take you to the section I'd like to ask
 12 you about and you can see if it rings a bell with you as
 13 something you would have input. So about halfway down
 14 this page here, and if we can just skim over a little of
 15 the points under "However":
 16 "We now have real concerns about the pace of
 17 progress and, in particular Second Sight's capacity ...
 18 "POL has now received 77 detailed applications and
 19 completed investigations in a total of 22 cases with 42
 20 currently under investigation at various stages.
 21 "POL sent their first investigation report to
 22 [Second Sight] on 29 November. Since then Second Sight
 23 have produced four reports, the first three were
 24 discussed by the Working Group on 7 March and were sent
 25 back for restructuring and rewriting as they had not
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1 **Q.** Okay. Just focusing in on the comment, "Their stance is
 2 they'll keep investigating until they get to the truth",
 3 where did that perspective or observation come from; can
 4 you help with that, regardless of who actually wrote the
 5 words in this document?
 6 **A.** So I think there had been a couple of conversations with
 7 Second Sight where they talked about getting to the
 8 truth more generally and, indeed, in a meeting at the
 9 beginning of -- some time in the beginning of 2015,
 10 there was a discussion with Second Sight about exactly
 11 what they were looking for, so looking at Post Office's
 12 business across the piece.
 13 So what I'd take from this is there is the
 14 sentiments that there is a concern that Second Sight
 15 would keep looking until they find something wrong,
 16 regardless of whether or not it's something wrong with
 17 Horizon, just something wrong in terms of the way that
 18 Post Office is managing its business more generally.
 19 That's not quite what is said here but I think that
 20 might be the essence of it.
 21 **Q.** Just looking further down the page, please, about
 22 two-thirds of the way down. We have this:
 23 "We are confident that there are no systemic issues
 24 with the Horizon system and indeed no evidence has been
 25 found by [Second Sight] or any other party."
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- 1 Can you help with whether this was your wording?
- 2 **A.** No. I can't recall. What I can say was that that was
3 the general view within Post Office.
- 4 **Q.** What was the basis for this quite confident view that
5 there were no systemic issues with Horizon?
- 6 **A.** Because this was the conclusion that Second Sight had
7 reached, not that they were confident but Second Sight
8 had said they found no systemic -- I think these were
9 their words -- yes, they'd have found no system wide or
10 systemic issues with the Horizon system and, as far as
11 the Post Office was concerned, that was the case in 2013
12 and continued to be the case at this stage in the
13 process.
- 14 **Q.** So that is your understanding of the systemic issues
15 referenced: that it is used in the same way that Second
16 Sight had in their Interim Report, notwithstanding them
17 having found bugs and defects?
- 18 **A.** I think so, yes.
- 19 **Q.** Could we have on screen, please, SSL0000120. This is
20 a transcript of an audio recording of a conversation
21 that you had with Mr Henderson and Mr Warmington on
22 11 August 2022. I understand you have been provided
23 with this document but relatively recently; is that
24 right?
- 25 **A.** That's correct, yes.

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- 1 conversation that I am only having the conversation with
2 Second Sight because this all arose in August and pretty
3 much everybody was on holiday. So I think I make the --
4 I say at the outset I'm speaking on behalf of Post
5 Office and I think I was having the conversation in the
6 absence of Chris, who was away. Therefore, I was --
7 that -- that doesn't mean to say that I'm not owning the
8 statements I made but I was putting Post Office's view
9 across and I would say that, to some extent, Ron is
10 correct.
- 11 **Q.** Whose view were you putting across? I understand it's
12 the Post Office position but who had made you understand
13 that to be the way Post Office was approaching this?
- 14 **A.** So I can't say that it was, as with many of these
15 things, I can't say necessarily that it was anybody's
16 particular view, ie I can't name somebody who said this
17 is the way that we're going to approach it. What
18 I would say is that this is the way that the approach
19 was developing, not as -- I don't think quite as
20 noticeably as Ron was saying but that was certainly how
21 they felt about it. So -- and I think, looking at the
22 documents and what happened subsequently, I think
23 probably in part, this was informed by the Linklaters
24 advice.
- 25 **Q.** Turning, please, to the disclosure of material to Second

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- 1 **Q.** There's only one section I want to take you to. Just
2 going to page 24, please, and scrolling down the page,
3 please. The last entry here, Ron Warmington, who says:
4 "Okay. Belinda, I tell you what -- how we can
5 characterise this discussion. It is the antithesis of
6 what I was assured by the Chief Exec and Chairman, which
7 is -- our work, we pledge to you -- because I said
8 I wouldn't take on the job unless they agreed to this --
9 is to seek the truth as to what has happened. All
10 right? The characteristics of the conversations we are
11 having are one of litigants, one against the other,
12 trying to defend their case. It's perfectly acceptable
13 and perfectly normal. But a search for the truth would
14 have been far less an effort to protect the organisation
15 from an attack but more a sort of volunteering of what
16 the entire background was."
- 17 Do you recognise any truth in this, that the Post
18 Office's stance in this stage of the mediation was that
19 of a litigant trying to defend its case?
- 20 **A.** I think that, as the focus of the scheme, in the view of
21 the Post Office, was around particular cases, as opposed
22 to Horizon across the piece or, indeed, the business of
23 the Post Office as a whole, I think that could perhaps
24 characterise, in some part, the position of Post Office.
25 If -- I make it clear at the beginning of this

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- 1 Sight. That document can come down now. Thank you.
2 At paragraphs 49 and 50 of your statement -- and
3 I don't think we need to go to them unless you wish me
4 to -- but you refer there to believing Chris Aujard, and
5 later Jane MacLeod, as General Counsel, were responsible
6 for deciding the documents or information to be provided
7 to Second Sight; is that right?
- 8 **A.** Yes.
- 9 **Q.** But you do say you would offer assistance and opinion on
10 such matters, if you felt it was necessary?
- 11 **A.** Yes.
- 12 **Q.** Could we have on screen, please, POL00210527. This is
13 an email from Mr Aujard to Mr Warmington, dated
14 10 October 2014 but I think we need to just scroll down
15 a little, please. Yes. It's sent on his behalf, from
16 a different email account. You were copied in to this
17 email, where Mr Aujard explained why the Post Office
18 would not grant Second Sight access to prosecution
19 files.
- 20 **A.** Yes.
- 21 **Q.** Have you had a chance to read this email, when it was
22 provided to you?
- 23 **A.** Yes.
- 24 **Q.** He notes in the last paragraph of his email, scrolling
25 down a little, please:

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1 "In any event, with our investigation reports, we
2 have already provided you with any relevant source
3 material found in any Post Office prosecution files
4 (ie transcripts of interviews, witness statements, etc).
5 This material is of course used by Post Office's
6 security and prosecution teams to consider, and if
7 appropriate, conduct prosecutions however the resulting
8 internal documents are legally privileged. It is
9 outside your scope of work to review Post Office's
10 prosecution practices and decisions and so I see no need
11 to disclose this documentation (which, just to be clear,
12 has also not been released to Tony). Nevertheless, the
13 underlying source material provides you with the factual
14 information arising from any previous Post Office
15 investigation and so you should have what you need to
16 undertake your review."

17 Did Mr Aujard discuss the reasons behind withholding
18 these documents from Second Sight for privilege reasons
19 with you at all?

20 **A.** No, I knew this was his view but he didn't seek my
21 opinion or advice on it, particularly because these were
22 legal documents and matters of legal privilege were
23 broader than, I think, my knowledge or understanding.

24 **Q.** Could we have on screen, please, POL00214354. This is
25 an email from December 2014 and, on 10 December 2014 you

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1 a number of exchanges and conversations within Post
2 Office about the extent to which Second Sight might ask
3 for either raw or base data, or a lot of general
4 information that didn't relate specifically to
5 an application. So it was already, I think, the view
6 that had been set out to Second Sight -- I think
7 probably in relation to the 2008 emails -- and so that
8 was the context in which I sent this email.

9 **Q.** Could we have on screen, please, the last document
10 I want to go to on disclosure. It's POL00102245. This
11 is an email from Mr Aujard to you, dated 27 February
12 2015, regarding the requests made by Second Sight for
13 further access to files. Mr Aujard says this in his
14 second paragraph:

15 "Access to files was originally granted (before my
16 time) in relation to an entirely different assignment,
17 the broad terms of which were agreed with [Second Sight]
18 in June 2012. From what I can see, the background to
19 that review was that we wanted 'to conduct
20 an independent review of a number of closed, and
21 possibly some open fraud and theft cases'. That review,
22 or a variation on it, was undertaken before the Working
23 Group was formally established, and although it is hard
24 to pinpoint the precise end date, it would seem to me
25 that it did not survive beyond the publication of the

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1 email Mr Aujard, forwarding an email from Mr Parsons,
2 regarding Second Sight's questions for Post Office to
3 form Part Two report.

4 Just scrolling down, so you've got the context for
5 that. We see in that bottom email, Mr Parsons refers to
6 "some sensible questions":

7 "... there is also a massive fishing expedition for
8 information that does not address issues raised by the
9 applicants."

10 Scrolling back up, please, to your email, and you
11 say:

12 "Chris

13 "You need to have a look at this. It's Second
14 Sight's list of questions to inform Part Two. You will
15 see that this is a pretty considerable fishing
16 expedition which includes a lot of general requests. We
17 will need to do a formal response setting out where we
18 are not providing information -- for example, the
19 contract, investigation procedures. But grateful for
20 your view on approach before I start this."

21 Can you recall now why you considered the requests
22 to be a fishing expedition? I appreciate we're not
23 looking to the detail of those but does this ring a bell
24 with you at all as an issue?

25 **A.** It does, insofar as there had already been, I think,

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1 so-called 'spot reviews'. It also seems to me that it
2 was conducted for our benefit, although it was expressed
3 to be an 'independent review'. For this reason, more
4 liberal access was granted to our internal records etc
5 than is fitting current circumstance -- Rod is doing
6 a more detailed technical note explaining the reasons
7 why."

8 What was your understanding or do you recognise at
9 all this reference to Second Sight's initial involvement
10 being conducted for Post Office's benefit?

11 **A.** No.

12 **Q.** Was this something that you noted with any surprise at
13 the time, on reading this email?

14 **A.** No, no. Could you show me the date of it, again,
15 please?

16 **Q.** Of course. Scrolling up, please, it's 27 February 2015
17 and it's in the context of a request from Second Sight
18 for further access to files. So it's on the question of
19 disclosure.

20 **A.** Right.

21 **Q.** What this second paragraph does is to refer back to
22 disclosure that was previously given for -- on the basis
23 of the author's view -- a different purpose and that
24 purpose being, although it was to be expressed to be
25 an independent review, it seems to me it was conducted

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1 for our benefit. The suggestion here is that, because
2 it was for Post Office's benefit, more liberal access
3 was granted to internal records than in the
4 circumstances of the scheme and this date in time.

5 **A.** So I don't recall this. The reason I'm hesitating
6 slightly is, until I watched an evidence session last
7 week, I don't think I'd have had any idea what this was
8 referring to but I think I do now. I think it was
9 a report Second Sight did for Susan Crichton, just
10 simply because that's how it reads to me now. But
11 I wasn't aware of it at the time. This was primarily
12 an email from Chris to assist Jane MacLeod, as the
13 incoming General Counsel and, looking at the timing of
14 it, this was about four weeks before I was due to leave,
15 and I have to say, by this time, I was starting to --
16 I was tidying up things, so that I could leave and
17 things would have been handed over.

18 So I probably wouldn't have paid too much close
19 attention to this because this was no longer an issue
20 that I would have been involved in going forward. So
21 I don't remember seeing it, I don't remember seizing on
22 it or questioning it at the time, but I do now think
23 I understand what it relates.

24 **Q.** Okay. Just one more point on this document before we
25 move on, please. It's the bottom of page 2. So this is
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1 known, that this -- what I'm saying now may sound rather
2 odd but, at the time, in Post Office, I still detected
3 a level of confidence in the Horizon system and -- but
4 Second Sight were under pressure to find something that
5 hadn't previously been -- hadn't previously been found,
6 and that was the reason for my speculation.

7 **Q.** Turning briefly to the closure of the Mediation Scheme,
8 you deal with this at paragraph 96 of your statement.
9 That's page 47, if we could have that on screen, please.

10 You say here:

11 "I was clearly involved in some, but not all
12 discussions on amending/closing the scheme. Ultimately,
13 it was the Subcommittee, presumably endorsed by the
14 Board, that decided. As far as I recall my view is that
15 it was a matter for [Post Office Limited] to decide what
16 it wanted to do. I think I felt that if the original
17 idea of some of the Scheme was aimed at hearing
18 [subpostmaster] complaints with a view to resolving
19 complaints and drawing a line under the matter, then it
20 had not worked. If anything, some [subpostmasters] and
21 JFSA seemed less happy than when the Scheme started,
22 Second Sight was publicly critical of [Post Office
23 Limited] and there was, as far as I recall,
24 a notification of legal action by a group of
25 [subpostmasters] in the future. As such, I agreed that
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1 your email and, to give context, if we can just scroll
2 up to show the top of the email. With a subject
3 "Catch-up call with Second Sight"?

4 **A.** Yes.

5 **Q.** Towards the bottom, the penultimate paragraph gives
6 a note and you refer to:

7 "Colleagues who are due to meet with them may also
8 wished to note a marked change in note and behaviour in
9 recent weeks notably from Ian ..."

10 Is that Ian Henderson?

11 **A.** *(No audible answer)*

12 **Q.** "He is much more aggressive, accusatory, defensive in
13 tone than our previous experience. I would speculate
14 that this is frustration because they are still
15 struggling to find a smoking gun and feel the weight of
16 expectation from others to do so, especially after the
17 Select Committee. The change is marked and it is worth
18 keeping in mind ahead of next week's meetings."

19 What was the reason that you came to this view on
20 the cause of Mr Henderson's frustration, that they
21 couldn't find a smoking gun?

22 **A.** It was speculation, nothing more than that. So I had
23 felt on numerous occasions that the expectations on
24 Second Sight were great. I do realise, in view of
25 what's subsequently come out and what's subsequently
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1 there was little point in carrying on with the Scheme in
2 the same format, as long as those applicants remaining
3 in the Scheme were able to have their complaints
4 investigated and mediated as they had been expecting
5 I was also leaving shortly, so whatever decision was
6 made I was unlikely to be involved in next steps."

7 At 97 you add:

8 "In terms of what [Post Office Limited] wanted out
9 of the scheme and the Working Group, from the documents
10 provided to me I cannot see that the outcomes [Post
11 Office Limited] desired were achieved. This may be the
12 reason why a decision was taken to close down the
13 Working Group and Scheme. I think (and hope) that at
14 least a small number of applicants in the scheme who
15 submitted a complaint which was resolved were
16 satisfied."

17 Picking up on the question of what the Post Office
18 wanted out of the screen, could we have on screen,
19 please, POL00027506. This is the Executive Committee
20 agenda for its meeting on 19 November 2013. You do not
21 appear to have been present at this meeting but I'd like
22 to ask you about one part of a paper, which appears to
23 have been presented by Chris Aujard. We can see the
24 first item on the agenda is the update on Horizon and
25 especially the draft settlement policy for the Mediation
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1 Scheme. The paper starts on page 2. We can see there
2 the title. Going, please, to page 3 to paragraph 4.,
3 the title is "Ensuring the success of the scheme", and
4 at 4.1 it says this:

5 "Post Office has invested time and money in creating
6 the Scheme, and positioned it with the media, MPs and
7 JFSA as the response to the Second Sight Report. It is
8 therefore important that the scheme achieves its
9 objectives and is generally acknowledged as being
10 successful in answering the concerns of subpostmasters.

11 "From the Post Office's perspective, the Scheme will
12 have been a success if, when it has completed:

13 "the media, MPs and JFSA consider that the Scheme
14 fairly investigated and, where appropriate, addressed
15 the subpostmaster concerns identified in the Second
16 Sight Report, even if there is disagreement over the
17 outcome of the individual cases ..."

18 Then this, at the second bullet point:

19 "Post Office can more robustly defend its use of the
20 Horizon system against criticism by a minority of
21 subpostmasters who, despite best efforts, remain
22 entrenched in their dissatisfaction with Post Office
23 ..."

24 Were you aware that one of the Post Office's desired
25 outcomes for the scheme was to robustly defend its use

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1 Mediation Scheme from having a positive outcome?
2 **A.** I'm not sure that I can answer that question.
3 I certainly felt that, during my time in the scheme --
4 and as I think I say in my statement, I didn't see --
5 I didn't often have cause, by virtue of my role, to look
6 at the investigations but my understanding was that Post
7 Office had an answer for everything, and so, whether or
8 not having that answer actually stopped a more
9 open-minded approach to Horizon and its faults, I don't
10 know. Like I said, I struggle to answer that.

11 What I did feel, from my position inside the scheme,
12 and that's the processing of the scheme, was that a huge
13 amount of effort went into making the scheme as good as
14 it could be. But that might be more a process point
15 than anything else.

16 **Q.** That can come down now. Thank you. Just one final
17 matter from me: in answer to one of my questions this
18 morning, you said that it was a matter of regret that
19 you didn't challenge Andrew Parsons' suggestion that the
20 importance of the Rose advice be downplayed. You
21 suggested, and I hope that I'm right in characterising
22 it as such, that this was among many regrets. What are
23 the other regrets you are referring to?

24 **A.** So I suppose sitting here now, I regret not digging down
25 deeper into some of the issues that clearly passed my

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1 of the Horizon system against criticism?

2 **A.** No. Not as such. But I was aware that Post Office
3 hoped that, at the conclusion of the scheme, there would
4 be a higher level of understanding and satisfaction
5 with -- no, maybe that's -- so, definitely, I did not
6 know that this was to allow Post Office to more robustly
7 defend the Horizon system, in those terms, but I did
8 think that Post Office would feel that they had
9 undertaken a thorough investigation of the complaints
10 that had been raised and, if nothing had come out in
11 relation to Horizon, then there would be less
12 dissatisfaction with Horizon.

13 I'm really sorry, I haven't answered that very well,
14 but that -- that as a stark outcome is not my
15 understanding but probably something more nuanced was my
16 understanding.

17 **Q.** Was the Post Office's stance to defend Horizon
18 throughout the Mediation Scheme?

19 **A.** No, not at the expense of anything else. That was not
20 my understanding. But I think the Post Office's stance
21 was definitely to defend Horizon in the absence of
22 finding anything that suggested to Post Office that it
23 was not working as it should.

24 **Q.** Looking at it in these stark terms, do you think that
25 this objective or this desired outcome hindered the

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1 desk because, had I done so, I might have asked more
2 questions. I can't guarantee -- because there's -- this
3 whole issue continued well after I left -- that it would
4 have made any difference but, looking at the documents
5 this far after the event, I've looked at a few and
6 thought, "I could have done something differently with
7 that and maybe that would have made a difference".

8 What the perspective I don't get on this is, looking
9 at what my inbox would have looked like, and other
10 things that I would have been doing, particularly
11 preparation for a Working Group at any given time, like
12 many people, I'm just selective about the issues that
13 I pursue with any depth but -- so I don't know that
14 I could be specific. I could probably come up with
15 a list if you needed it, and I would say, regret being
16 involved in it in any way at all, is my biggest regret,
17 if I'm honest.

18 **MS PRICE:** Sir, those are all the questions I have. Do you
19 have any questions before I turn to Core Participants?

20 **SIR WYN WILLIAMS:** No thank you. No.

21 **MS PRICE:** We have some questions from Mr Jacobs first and
22 then from Ms Page, and I think that is it.

23 **SIR WYN WILLIAMS:** Right. Thank you.

24 **Questioned by MR JACOBS**

25 **MR JACOBS:** Good afternoon, Ms Cortes-Martin. I hope you

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1 can hear me well enough.

2 I represent a large number of subpostmasters who are
3 Core Participants in this Inquiry. I want to ask you
4 about Project Sparrow and the disbanding of the Working
5 Group. Could we go to a document, please, POL00021908.

6 While we're waiting for this to come up, I'll tell you
7 that this is an email that Andrew Parsons of Bond
8 Dickinson wrote to you, copying in Mr Williams and
9 Mr Matthews, on 9 February 2015.

10 We'll see it starts:

11 "Belinda

12 "A few thoughts below on the Sparrow paper."

13 Now, we know, of course, that you're the Programme
14 Director of Sparrow and we also understand that around
15 about the February '15 time, there was a Sparrow meeting
16 and there were suggested amendments to the Mediation
17 Scheme raised at that meeting; is that is right?

18 **A.** Yes.

19 **Q.** That's right. So what Mr Parsons says in the first
20 paragraph is:

21 "In general, I agree with the idea of disbanding the
22 [Working Group] as (i) it offers no real value and (ii)
23 it is the source of much of the criticism of POL."

24 Then he says he can see some challenges with other
25 suggestions. So just looking at that, Sparrow had

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1 the work of the Working Group. You are involved in
2 discussions that are surrounding the disbanding of that
3 group. Why didn't you think you should say anything at
4 that time -- or perhaps I'll rephrase that. Did you
5 think you should have said anything at that time?

6 **A.** So, again, my -- from the outside, a long time
7 afterwards, looking in, I see things differently.

8 **Q.** Of course.

9 **A.** So discussions within Post Office, both at Executive
10 level and Board level, about altering the scheme or
11 closing the scheme, had been continuing, by this time
12 probably for about a year. I think there was a Post
13 Office Board meeting February 2014 and, although the
14 matter of the Working Group and the scheme was under
15 review, and my team were asked to offer a number of
16 proposals for altering it, nothing ever happened. So it
17 was -- I think that it was too difficult to make those
18 decisions and so, because I saw my role as largely just
19 running the scheme, I just continued to do that to the
20 best of my ability, and I don't think I ever really
21 thought that there was any real prospect of the scheme
22 closing, was one point.

23 The other point is, I didn't see my responsibilities
24 in relation to the Working Group going so far as to say
25 to the Working Group what was being discussed in Post

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1 proposed that the Working Group be disbanded; is that
2 right?

3 **A.** I don't know that Sparrow had proposed. I think that
4 the proposal came from a meeting of the Executive
5 Committee, from ExCo.

6 **Q.** Right.

7 **A.** I don't know that Sparrow by that stage, insofar as it
8 existed other than a name, actually proposed anything.

9 **Q.** Quite clearly you knew about the proposal because
10 Mr Parsons is writing to you about it?

11 **A.** Yes.

12 **Q.** You said earlier on in your evidence this morning that
13 you didn't, at the time, perceive any particular
14 conflict between your role as Programme Director of
15 Project Sparrow --

16 **A.** Yes.

17 **Q.** -- and the Secretariat function that you had with the
18 Working Group.

19 **A.** Yes.

20 **Q.** There was, we understand, a meeting of the Working Group
21 on 13 February 2015, so shortly after this.

22 **A.** Mm-hm.

23 **Q.** The agenda, which I think you prepared, shows that this
24 issue didn't come up. Did you feel at this point, here
25 you are, you're assisting Sir Anthony Hooper, assisting

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1 Office.

2 **Q.** Well, I'll move on.

3 **SIR WYN WILLIAMS:** Hang on. That's the point, really, isn't
4 it? That you were learning things by virtue of your
5 role as Director of Project Sparrow --

6 **A.** Yes.

7 **SIR WYN WILLIAMS:** -- ie an internal Post Office group of
8 people, which, on occasions, might have put you in
9 conflict with your role as secretary to the Working
10 Group and Sir Anthony.

11 **A.** I --

12 **SIR WYN WILLIAMS:** I'm not saying they did, in your case,
13 but I'm talking about what might have happened.

14 **A.** And I see that, which is why I think I say, looking now
15 and looking in, I can see where that might have been the
16 case but it didn't feel like that at the time.

17 The point at which it felt like it, was the point at
18 which actually the subcommittee made a positive decision
19 to close the Working Group or to -- yes, yes, to disband
20 the Working Group and to alter the scheme, and I think
21 that was the point that, although I wasn't going to be
22 at the subsequent Working Group meeting, I raised the
23 question with Jane MacLeod who was the new Post Office
24 General Counsel, to say I think the programme team need
25 guidance on how to manage the next Working Group meeting

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1 in light of the decision that has now been made because,
2 prior to that, I don't think any decision had been made.

3 **MR JACOBS:** Thank you, so what you're talking about is
4 around about the time of this email, isn't it, when
5 they've decided to close it?

6 **A.** Yes, I think it was subsequent to that.

7 **Q.** Right, if we can go to the next paragraph then, so where
8 Mr Parsons talks about Second Sight's role. He says:

9 "If [Second Sight] are independently contracted by
10 applicants ..."

11 That was one of the suggestions that was floating
12 around. He goes on to say:

13 "... I cannot see how POL can dictate [Second
14 Sight's] scope of work."

15 In what way did Post Office seek or want to dictate
16 the work of Second Sight? "Dictate" is a very strong
17 word to use, isn't it?

18 **A.** It is. I'm afraid I can't answer that question. So
19 Post Office wanted to set the scope of Second Sight's
20 work and I think that previous documents will show that,
21 insofar as that Post Office felt that Second Sight
22 should not be looking at prosecutions and should not be
23 looking at matters of contract, so I think that's the
24 point in relation to dictating the scope. I think
25 "dictating" a strong word.

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1 **Q.** So this is an attempt to control the process, isn't it?

2 **A.** Well, I think it's Andrew's view of what Post Office
3 might do to control the Post Office if that's -- sorry,
4 to control Second Sight. I don't know that that can be
5 said to be Post Office's view because I'm not aware of
6 that and I'm also not entirely sure why Andrew felt the
7 need to send it to me, rather than to send it to the
8 authors of the report, and I would imagine I would have
9 sent it to the authors of the report.

10 **Q.** Well, moving on -- yes, moving on to the bottom of
11 page 1. The paragraph that begins "I wonder". It's
12 just before the section "Mediating all non-criminal
13 cases". So Mr Parsons also then says to you:

14 "I wonder whether POL would be better keeping
15 [Second Sight] under direct contract and then, without
16 the [Working Group], POL could more easily dictate
17 [Second Sight's] work (ie stopping Part 2 and focus on
18 cases). This has the advantage of narrowing [Second
19 Sight's] role whilst maintaining more direct control."

20 Now, my question to you is Mr Parsons isn't
21 an outlier here, these aren't sort of wild suggestions.
22 This is part of the discussion that's going on and you
23 were part of it. Can you comment on that and what
24 Mr Parsons says, please?

25 **A.** So I'm not sure -- as Mr Parsons has only sent it to me,

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1 **Q.** Well, Mr Bates gave evidence on 9 April and he said that
2 at all stages until the Group Litigation, Post Office
3 were very, very anxious to control the narrative, to
4 control the process, and that's what Post Office were
5 doing here, isn't it?

6 **A.** In terms of --

7 **Q.** Dictating what Second Sight were doing, controlling
8 them?

9 **A.** Well, I can't speak for Andrew and I wouldn't have put
10 it in those -- I wouldn't have put it in those terms.
11 So I'm afraid, sorry, I can't help you more than that
12 particular point.

13 **Q.** No, it's all right. I'll move on to the next paragraph,
14 where Mr Parsons says:

15 "Similarly, without direct control over [Second
16 Sight's] scope of work, it will be very difficult for
17 POL to stop applicants aggregating their funding to pay
18 [Second Sight] to produce a 'Part 2 Report'."

19 So what Mr Parsons is telling you here is Post
20 Office need to control the process, control Second
21 Sight, because we don't want Second Sight to produce
22 their final report because Post Office will not like
23 what Second Sight are going to say. That's the point,
24 isn't it?

25 **A.** I think so, yes.

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1 I'm not -- it seems to me as though he's hazarding
2 a view but he's not entirely sure whether or not -- how
3 that will sit within the Post Office, therefore he's
4 only sending it to me. So Andrew was involved in
5 anything to do with the scheme and other issues
6 throughout the whole of my time on the scheme. So he
7 was very much involved. I don't know that his views
8 always prevailed or always represented the views of Post
9 Office. I read this as him saying, "This is what Post
10 Office could do."

11 I didn't feel that -- this seems to me to be quite
12 extreme in terms of what Post Office might have wanted
13 to do.

14 **Q.** Let's move on, then, to the last part, "Mediating all
15 non-criminal cases". So Mr Parsons goes on to say:

16 "Mediating all non-criminal cases of course means
17 mediating lots of hopeless cases. Mediating
18 unmeritorious cases raises applicants' expectations
19 unfairly and may in fact create greater animosity and
20 complaints (certainly that was my experience [and he
21 names one of the cases]). My recommendation would be
22 for POL to take a tougher line and only mediate
23 meritorious cases (even if the bar for this is set
24 low)."

25 Now, that's what he suggests but the real reason is

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1 the next paragraph:

2 "This would also be consistent with the principle of
3 not mediating criminal cases."

4 Now, you know that the Post Office didn't want to
5 mediate criminal cases; that's right, isn't it?

6 **A.** Yes. They were taking it on a case-by-case basis.

7 **Q.** He goes on to say what the primary reason for that is
8 and this is what he's saying to you:

9 "Although the primary reasons for not mediating the
10 criminal cases is the criminal risk, another way of
11 seeing them as simply cases which lack any merit because
12 the Applicants have committed criminal offences."

13 The criminal risk, of course, is that, if those that
14 have been convicted get more information from the
15 Mediation Scheme, then they could go to the Court of
16 Appeal and seek to have their convictions overturned.

17 **A.** I can't account for Andrew's views and I don't really
18 want to try. I think -- but in terms of your last
19 point, the cases that had been subject to a criminal
20 prosecution were entered into the scheme, those that
21 applied, and they were investigated and they were
22 provided with information. I'm not sure that the
23 mediation, as such, would have made any difference to
24 the information that was given.

25 **Q.** Very well. Well, finally, then, last two points on this
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1 expected it, but did you discuss this with him, as he
2 would seem to be suggesting?

3 **A.** I think it's highly unlikely.

4 **Q.** Why is that?

5 **A.** Because the -- this particular discussion about the
6 scheme came out of a conversation at ExCo, I think, and
7 it was based on the drafting of a paper for the Board --
8 sorry the subcommittee, and the paper was drafted by
9 Jane MacLeod and Mark Davies. So, if anybody wanted to
10 discuss this with Andrew, it would have been for them.
11 I would imagine if I did anything with it I would have
12 sent it to them.

13 **Q.** This was 9 February 2015. Now, I know that left and you
14 retired on 31 March 2015, so this would have been right
15 at the end of your career --

16 **A.** Yes.

17 **Q.** -- with the Post Office. Do you remember this? It was
18 at the end --

19 **A.** No.

20 **Q.** -- it was quite a significant letter to you?

21 **A.** No, I don't. So there have been one or two emails that
22 I've seen in the bundle that Andrew has sent to me and
23 I've not been entirely sure why he has sent them to me
24 or just sent them to me. This is in that category but,
25 definitely by this stage, these were issues for ExCo and
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1 letter, Mr Parsons says:

2 "Taking a stance that POL will not mediate
3 unmeritorious cases has the advantage of carving out
4 more cases as well as avoiding the criminal cases
5 without having to base this on unattractive 'legal risk'
6 argument."

7 So Post Office didn't want to have to say, "We don't
8 want to mediate criminal cases because it might
9 transpire that there were miscarriages of justice"; they
10 wanted to be able to say, "Well, it's because they're
11 not meritorious".

12 **A.** So I think I have to refer to my previous answer and
13 that is I can't speak for Andrew but also I think he's
14 making it clear that this is his view or
15 a recommendation and, particularly on matters of
16 criminal prosecutions and what could and couldn't be
17 achieved, that is an area that I would try to avoid in
18 any event because I'm not a criminal lawyer and I don't
19 understand enough to be able to speak with any sort of
20 competence on it.

21 **Q.** Well, Mr Parsons ends his message with "Happy to
22 discuss".

23 **A.** Mm-hm.

24 **Q.** Now, presumably, what you said was you might have been
25 surprised, you might have been shocked or you might have
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1 the subcommittee, and I wouldn't have engaged with
2 Andrew -- I mean, I can't guarantee but I can't imagine
3 picking up the phone and discussing this with him.
4 Insofar as I might have had the conversation with him,
5 I might have said "Do you want me to just send this to
6 Jane and Mark?"

7 **MR JACOBS:** Sir, I have some more questions on the question
8 of suspense accounts where Ms Cortes-Martin was
9 involved. I note the time, I don't know if you would
10 wish to take a break now or continue.

11 **SIR WYN WILLIAMS:** Let's hear you out, Mr Jacobs. I'm sure
12 you can do it reasonably swiftly and then we may take
13 the break.

14 **MR JACOBS:** Indeed.

15 Could we go to POL00040805. Could we go, please, to
16 page 3 of 4 in this document. It is an email that you
17 sent to Ruth Phillips, dated 15 January 2015 at 16.59.
18 Scrolling down, please. You send it to Tracy and you
19 ask for this to be passed on to Alisdair. Is that
20 Alisdair Cameron?

21 **A.** Yes.

22 **Q.** You say:

23 "Dear Alisdair

24 "I understand that Chris Aujard has spoken to you
25 about the discussion at yesterday's Working Group
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1 meeting of the Complaint and Mediation Scheme. For some
2 months, Second Sight and the independent chair of the
3 Working Group -- Sir Anthony Hooper -- have been asking
4 for information on the operation of the Post Office's
5 Suspense Account. Put simply, this amounts to ..."

6 Then:

7 "How much of is absorbed to Post Office P&L [that's
8 profit and loss] from the suspense account each year;
9 and

10 "How much of that [is connected] to money which
11 is/may be properly due to subpostmasters."

12 They go on to say:

13 "The nub of the issue is whether it is possible for
14 a subpostmaster/subpostmasters to have made good a loss
15 in branch or held accountable for a loss where it later
16 transpires that the money was not owed therefore Post
17 Office gains."

18 So the point that Sir Anthony was raising is that
19 subpostmasters may have paid money into the Post Office
20 on account of Horizon shortfalls that may or may not
21 have been real and the suspense accounts would assist on
22 showing whether the shortfalls were real or not.

23 A. Mm-hm.

24 Q. Is that your understanding of what Sir Anthony was
25 asking?

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1 A. I think, if I understood the situation correctly, he is
2 saying he doesn't want to give Second Sight any more
3 information than necessary to address that narrow
4 proposition, which I think was Sir Anthony Hooper's
5 proposition.

6 Q. Okay. If we then go to page 2 of 4, we'll see that
7 there was a suggestion that Rod Ismay addresses this
8 point. Do you see, you wrote an email on 16 January --

9 A. Yeah.

10 Q. -- 2015 and you said:

11 "I understand that you are both speaking with Rod
12 today about suspense accounts."

13 So the proposal was that Rod Ismay would discuss
14 this with the Working Group?

15 A. Well, I'm not sure whether if discuss it with the
16 Working Group or Second Sight.

17 Q. Right.

18 A. Can I say something about the suspense account issue?

19 Q. Yes, indeed.

20 A. So the suspense account issue and -- as with some other
21 issues, were issues that I was involved in coordinating.

22 So there were conversations, some of which I wouldn't
23 have been involved in, in terms of how to get the

24 information required. So my interest in this was that
25 this information needed to be provided, it was a matter

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1 A. Yes, I think it is.

2 Q. He'd asked it on many occasions, hadn't he?

3 A. In various forms, yes.

4 Q. Sir Anthony gave evidence on 10 April and he said he
5 asked quite a few times, repeatedly, and he said "I got
6 absolutely nowhere and nor did Second Sight", and never
7 got the answer.

8 If we could go scrolling down to Chris Aujard,
9 page 3 of 4. He writes an email, here we go, 16 January
10 2015, 8.28 on the same issue. He is saying:

11 "As you will see, I really need someone from your
12 team who is technically switched on re suspense accounts
13 and can handle themselves in front of an adversarial
14 audience.

15 "As you can imagine, I am concerned that we give
16 Second Sight no more information than is necessary to
17 address the narrow proposition that money that is
18 'missing' from an SPMR account is somehow taken into our
19 suspense account and then appropriated to our P&L
20 [profit and loss]."

21 So Mr Aujard was very resistant to giving
22 information to Sir Anthony and to Second Sight; is that
23 right?

24 A. That's not my understanding or the way that I read this.

25 Q. Okay.

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1 for Post Office to determine what information it
2 provided. If Post Office didn't provide all the
3 information that Second Sight needed or Sir Anthony
4 Hooper wanted, then that needed to be a matter of record
5 and Post Office would have to deal with that.

6 But my involvement in this was trying to coordinate
7 activity, so that, by the time of the Working Group, if
8 that was the deadline, this information had been
9 provided.

10 Q. Well, one last document to show you is POL00021762 and,
11 while we're waiting for it to come up on the screen,
12 I can say that you were involved in this issue prior to
13 this, back in July or August 2014, weren't you?

14 A. From the very first instance it arose, yes.

15 Q. So if we go to page 3 of 5, we have an email from Andrew
16 Parsons to you and Angela van den Bogerd and this after
17 Ian Henderson had asked for all the suspense accounts,
18 and Mr Parsons says:

19 "Belinda, Angela

20 "As discussed briefly yesterday, I suspect that the
21 information requested by Ian below is highly commercial
22 [commercially], presumably] sensitive.

23 "It might also be that the figures in question are
24 quite high and this may then be portrayed as if there
25 are significant sums each month which can't be

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1 reconciled with POL's accounts. The inference from this
2 is that POL's processes/accounting systems are flawed
3 given the volumes of discrepancies. Whether or not this
4 is correct, it is an easy leap to make.

5 "Assuming that POL Finance say that this ... cannot
6 be closed, I've penned a short response to Ian below."

7 Then he just says it's, you know, commercially
8 sensitive.

9 So, again, we've got Andrew Parsons also saying to
10 you, "The Post Office doesn't want to give this
11 information to Second Sight, let alone Sir Anthony
12 Hooper"; would you agree?

13 **A.** Yes.

14 **Q.** Then we have Chris Aujard making the same point at
15 page 1 of 5, the 1 August 2014, 7.38 pm. He's writing
16 to you as well. He says:

17 "Belinda. I agree with Andy -- I'd like to avoid
18 giving anything if at all possible (less is more), but
19 if we do, rather than give them the data they've asked
20 for, we should provide ..."

21 I think "MI" is management information:

22 "... which gives context ..."

23 Then he says:

24 "... something along these lines: 'The amount held
25 in suspense accounts across the Post Office Network

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1 **Q.** But I do have to ask you this question because it seems
2 that you did have significant input in this matter: do
3 you accept that these accounts, if Post Office had
4 disclosed them, could have demonstrated that the
5 shortfalls were not real and that this could lead to
6 a presumption that the Horizon system that was
7 generating these figures was actually to blame and not
8 the subpostmaster? That's why the Post Office didn't
9 want that material to come out, isn't it?

10 **A.** So I see exactly what you're saying. It is not
11 something that -- it's not something that I concerned
12 myself with. I understand that it's one of those --
13 what Ms Price was saying, do I have any regrets, but
14 this is an issue that I did not get into the detail of.
15 I didn't understand it, in terms of the detail of the
16 suspense accounts and, as far as I was concerned, it was
17 a matter for Post Office to determine what information
18 it gave and to who, and Post Office would stand or fall
19 by its decisions.

20 But they weren't my decisions. So I understand what
21 you're saying and I realise it sounds as though I'm
22 saying "nothing to do with me" but, in reality, I wasn't
23 in a position to make those decisions; I wasn't in
24 a position to influence them and I did not attempt to do
25 so.

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1 averages £XX per trading period or approximately Y% of
2 the total value of the transactions processed each
3 trading period. Of the sums held in suspense accounts,
4 approximately Z% is cleared within 30 days, and all but
5 F% is cleared within 90 days."

6 So really my question for you is this was
7 a recurring scheme from Second Sight and from
8 Sir Anthony. You were directly involved in this and you
9 knew, because so many people were telling you, that Post
10 Office were absolutely determined never to give this
11 information out; that's right, isn't it?

12 **A.** Again, I don't necessarily read it that way.

13 **Q.** How would you read it?

14 **A.** Well, I -- it's not "not give anything out" but,
15 clearly, what Post Office were -- was inclined to do was
16 to only give out whatever information it felt was
17 appropriate. I think it was ultimately a matter for
18 Alisdair Cameron and Chris to decide what information
19 went out. So, as far as I'm concerned, Andrew and Rod
20 were telling the wrong people, and I would just have
21 passed their advice on to the people that were making
22 the decision.

23 **Q.** Well, I can see that you're saying that you were
24 effectively the messenger, the conduit?

25 **A.** Yes.

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1 **Q.** My final question for you is in relation to what you
2 told Ms Price: you said you regretted not digging down
3 deeper. You were in a position to have dug down deeper
4 on this issue; do you regret not doing so?

5 **A.** This and many others. What I don't understand -- so
6 subsequently many things have come to light, some of
7 which clearly crossed my desk, many of which I think did
8 not. It would be difficult for me to single out one
9 particular thing but what I don't want to do is give the
10 impression that it was my role to do this and,
11 therefore, I was not doing it, simply because that's not
12 what the case. But what I regret is that there were
13 things that crossed my desk and, had I drilled down into
14 them, I might have been able to highlight more. There
15 are many things that I could have done differently but
16 I didn't. This isn't a stand-out issue.

17 **MR JACOBS:** I just want to ask if I have any more questions
18 for you.

19 Thank you, I don't have any more questions. Thank
20 you.

21 **SIR WYN WILLIAMS:** Right.

22 Ms Page, how long do you expect to be?

23 **MS PAGE:** About 15 to 20 minutes, sir.

24 **SIR WYN WILLIAMS:** Right, we'd better take a break, then:
25 ten minutes. So what time shall we start?

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1 **MS PRICE:** 3.20, sir.
 2 **SIR WYN WILLIAMS:** 3.20, right. Fine.
 3 **MS PRICE:** Thank you.
 4 **(3.11 pm)**
 5 **(A short break)**
 6 **(3.19 pm)**
 7 **MS PRICE:** Hello, sir, it's over to Ms Page.
 8 **SIR WYN WILLIAMS:** Yes, fine.
 9 **Questioned by MS PAGE**
 10 **MS PAGE:** Where did your loyalties lie during your period
 11 working for the Post Office?
 12 **A.** I'm not sure that -- I mean, when I was doing work for
 13 the Working Group and the Chair, then my loyalties lay
 14 there, and when I was doing work for Post Office, my
 15 loyalties lay there.
 16 **Q.** Once you were working for the Secretariat, as you've
 17 described it, did you feel that you owed any obligation
 18 to Second Sight?
 19 **A.** No.
 20 **Q.** Can we look, please, at POL00300442. If we look,
 21 please, at the bottom half of the page, when it comes
 22 up -- the bottom half of the first page -- so on
 23 27 October 2013, that's not long after you began --
 24 **A.** That's correct.
 25 **Q.** -- you say to Angela van den Bogerd:
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1 Parsons' suggestion within [the email you were just
 2 referring to] ..."
 3 Then quoting from it:
 4 "... 'Work is continuing on managing SS out of the
 5 Scheme. In general, SS's role is gradually being
 6 reduced until they can be removed entirely. This work
 7 has already begun'. "
 8 So there you say you're unable to explain the
 9 background. That's fair enough but the fact is you were
 10 then commissioned to do a note on your subject and you
 11 don't mention that in your statement? Did you forget
 12 about it?
 13 **A.** I don't remember being asked to do it but I had seen --
 14 the email that you referred to earlier was in my
 15 documents, in my document pack.
 16 **Q.** Well, the email I took you to was, in fact, in the
 17 second document pack, so you didn't have it when you
 18 made your statement. Had you forgotten about it when
 19 you made your statement?
 20 **A.** Well, I definitely didn't recall it.
 21 **Q.** Well, in any event, the combination of these emails
 22 makes it plain that you knew from the outset that Post
 23 Office wanted to get rid of Second Sight, didn't you?
 24 **A.** I knew that Post Office wanted to reduce the involvement
 25 of Second Sight, so --
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1 "Angela
 2 "I said I would do a note about how to move to
 3 a place where Second Sight are able to leave the Working
 4 Group and allow Post Office take over sole
 5 responsibility for the investigations?"
 6 That's pretty clear, isn't it?
 7 **A.** In terms of the note that I was going to do, yes.
 8 **Q.** So you were asked to look into moving Second Sight out
 9 of the Working Group altogether and allowing Post Office
 10 to take over sole responsibility, yes?
 11 **A.** I think so. There was an email that we referred to
 12 earlier, I think, which was an email from Andy Parsons
 13 which had said -- had suggested that a decision or plans
 14 were already in place to move Second Sight out.
 15 I assume that this followed on from that. So I assume
 16 that those were plans that were already considered by
 17 Post Office and I was asked to do a note.
 18 **Q.** Exactly. So you were well aware of the Post Office's
 19 plans at this point in time. If we could have a look at
 20 your witness statement, please, where you deal with the
 21 Parsons email, and it's at page 28, paragraph 59.
 22 **A.** Yes.
 23 **Q.** We'll just wait for it to come up on the screen. Now,
 24 you say there:
 25 "I am unable to explain the background to Andrew
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1 **Q.** Well, that's not what they say, is it, these emails?
 2 They say that they are to be removed completely from the
 3 scheme and Post Office is to take over the role
 4 completely, exclusively. They didn't want to reduce it,
 5 did they, and they made it perfectly plain to you
 6 because you wrote a note about it? They wanted to get
 7 rid of them, didn't they?
 8 **A.** So I hadn't seen the note that I wrote, or indeed
 9 whether I did, but certainly the plan was to remove
 10 Second Sight. What I'm not clear on, because I can't
 11 tell from the documentation and I don't believe I ever
 12 guilty to the bottom of it, because I think as I said
 13 previously, I don't know that I ever managed to speak to
 14 Susan Crichton about it, is exactly whether that related
 15 to immediately or when the work of that -- when the
 16 Mediation Scheme, as set up, which was clearly envisaged
 17 to last for a very short period of time, whether or not
 18 the plan was for Second Sight to disappear after that.
 19 **Q.** Ms Cortes-Martin, this set the tone, didn't it? This
 20 was the first thing that you were asked to do, more or
 21 less, and it made it plain that your loyalties were with
 22 Post Office, and, if there was a disagreement between
 23 Post Office and Second Sight, your loyalties would be
 24 with Post Office, wouldn't they, because you were asked
 25 to find a way to get rid of Second Sight?
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1 **A.** So I don't know that I had loyalties to anybody but,
 2 if -- but Post Office were responsible for the scheme
 3 and, if Post Office wanted to run the scheme in
 4 a particular way, as far as I was concerned, that was
 5 a matter for -- matter for Post Office. I didn't have
 6 any particular loyalties to Post Office or Second Sight.
 7 And in relation to loyalties to Post Office, I had not
 8 had a career with Post Office and I was leaving Post
 9 Office. I didn't feel that I had a particular
 10 obligation to do anything in defence of Post Office but,
 11 if Post Office asked me to explore options for Second
 12 Sight leaving the scheme, then that's what I would do.

13 **Q.** Well, let's have a look at what else you were asked to
 14 do. If we could bring up POL00164253, please. This
 15 email chain is from December 2013 and if we scroll all
 16 the way down to page 5, when it comes up, please. So if
 17 we just go down a little bit further, it begins with
 18 Rodric Williams to Jarnail Singh, copying you in,
 19 3 December 2013, it says:
 20 "Jarnail -- senior management has asked for the
 21 'current position on prosecutions -- when paused/what do
 22 we have in train'.
 23 So these two lawyers had both received the Clarke
 24 Advice and, indeed, both of them were instrumental in
 25 managing the aftermath of the Clarke Advice and I'm
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1 **A.** Yes.
 2 **Q.** So we're now moving to past prosecutions. Having talked
 3 about current prosecutions and when they were paused,
 4 it's now looking at past prosecutions. As you say, if
 5 we then go up to the top of this chain, we can see that
 6 on the same day, you take over this line of query and
 7 you do so, as you said, because you've been asked to
 8 deal with an action and you tell them:
 9 "I now have the actual action from the Board."
 10 You give a deadline and then you say:
 11 "The action is:
 12 "The Board asked for a note from the General Counsel
 13 explaining who was named in the past prosecutions and
 14 the liability for the Business and individual Board
 15 members. The note should also include information on
 16 both PI and D&O insurance cover."
 17 "D&O" was Directors and Officers insurance cover,
 18 wasn't it?
 19 **A.** I think so, yes.
 20 **Q.** So the Board were concerned about their personal
 21 liability for past prosecutions, yes?
 22 **A.** So I was asked to address this in my statement. The
 23 Board asked for advice from General Counsel on it.
 24 I probably take the question quite literally but I don't
 25 know whether or not they were concerned or they just
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1 talking about the July Clarke Advice that Ms Price took
 2 you to earlier on.
 3 Here, they're discussing current prosecutions, and
 4 the question is, when were they paused? Now, the fact
 5 is that the Clarke Advice required a pause because it
 6 discredited the expert witness that was in use and there
 7 was no one to testify to the integrity of Horizon
 8 records. So this looks like an email chain dealing with
 9 the response to the Clarke Advice; does that make sense?
 10 **A.** If it was, I wasn't aware of it. I think it was --
 11 I think it was an email chain to get information to
 12 inform a Board paper.
 13 **Q.** Indeed, we'll come to that. If we go up first, please,
 14 to page 3. I think we just go, I think, a little
 15 further down. Yes. It changes slightly, Mr Williams
 16 says:
 17 "Thanks.
 18 "I have another question -- do you know who was
 19 responsible for prosecuting cases before separation, ie:
 20 "in whose name were the prosecutions brought;
 21 "who was the prosecuting authority; and
 22 "who would ultimately be responsible if
 23 a prosecution was found to have been improperly
 24 conducted?"
 25 Again, you're copied in, yes?
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1 wanted advice on it.
 2 **Q.** Is that really your answer? Are you suggesting that the
 3 directors wouldn't be concerned if they were seeking
 4 advice on their personal liability for wrongful past
 5 prosecutions?
 6 **A.** No, I'm not saying -- as I said, I think I'm taking the
 7 question quite literally. I'm not aware of any
 8 particular -- that they were worried about it but that
 9 they were asking advice on it. Now, that could be
 10 driven by concern but what I don't know is what caused
 11 the request for information.
 12 **Q.** Surely you would have found this out from Mr Singh or
 13 Mr Williams, the two lawyers who had begun this email
 14 chain and who could have given you the answer?
 15 **A.** I don't know.
 16 **Q.** You weren't curious, I see. You've then gone on to deal
 17 with the personal liabilities but, before you do that,
 18 you say, under the heading, just a little further down:
 19 "Prosecutions already in process before we 'paused'.
 20 "I will insert the information provided by Jarnail
 21 earlier today."
 22 So no curiosity at all there about why they'd been
 23 paused, no?
 24 **A.** So my understanding was that prosecutions had been
 25 paused because of the scheme.
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1 Q. Sorry? Explain that.
 2 A. My understanding was that Post Office had decided to --
 3 not to continue with prosecutions while the scheme was
 4 in process.
 5 Q. I see. You then go on to deal with the liability for
 6 individual Board members in a little detail, I won't
 7 take you through that, but what happens next is, on
 8 6 December there's a further email chain and it's
 9 POL00198765. If we go down to the crossover between
 10 page 2 and page 3, please, it begins with David Oliver
 11 sending to you, Chris Aujard, Rodric Williams, Jarnail
 12 Singh, under the heading "Board Paper", no doubt the
 13 board paper that you were putting together, it just has
 14 an attachment, "Civil Claims Risk -- Response.pdf".
 15 Then we can go up we can make a bit of sense of that
 16 because Mr Singh -- if we pause there, there's a line
 17 starting on 13 December 2013, Jarnail Singh wrote. We
 18 can then see what he writes, he says:
 19 "Having read the Bond Dickinson note ..."
 20 That's evidently the one that was attached to the
 21 below email:
 22 "... I was concerned that the [likelihood] of action
 23 being brought had not been assessed.
 24 "Accordingly I asked Cartwright King to review Bond
 25 Dickinson note. I attach senior counsel Simon Clarke's
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1 "That protection would not be available to
 2 an organisation which conducted its prosecutions
 3 'in-house', that is, in POL's case, using lawyers
 4 directly employed by POL."
 5 You say:
 6 "Am I right in interpreting this as meaning that as
 7 Post Office does not conduct its prosecutions
 8 in-house -- that is, it uses Cartwright King rather than
 9 directly replied lawyers -- any claim for malicious
 10 prosecution would properly stand against Cartwright King
 11 and not POL, provided we follow our normal processes as
 12 described in the advice."
 13 Now, you have managed to get to the nub of it,
 14 haven't you, Ms Cortes-Martin, in this email. You are
 15 clearly analysing the lawyers' advices and you are using
 16 their advices and seeking further clarification so that
 17 you can write a detailed and careful Board paper about
 18 whether there is going to be any action taken against
 19 them, Board members, yes?
 20 A. Yes, I think so. I'm trying to put together the
 21 position and clarify the position so that, if I -- so
 22 that I can put in the board paper, yes.
 23 Q. Yes. So your earlier answer, in which you tried to
 24 suggest that you hadn't really dug into this and you
 25 didn't really know much about it, is not true, is it?
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1 response which [clarifies] the issues."
 2 So, evidently, he has attached a further advice.
 3 Now, first of all, that tells us that the Bond Dickinson
 4 note was one which, as far as Mr Singh was concerned,
 5 didn't cover the likelihood of action having been
 6 brought against Board members, yes? So both of these
 7 advices are dealing with actions potentially being
 8 brought against board members. Yes?
 9 A. I'm not entirely sure. I'm sorry but the -- at an early
 10 stage in the process, I was asked to pull together
 11 a Board paper, the outline of which -- or the action
 12 I was given and the outline of which I would have
 13 discussed with Chris. I -- well, David and I attempted
 14 to pull together the Board paper. I didn't analyse the
 15 various facets of it; I was just interested in
 16 populating a board paper for Chris to sign off.
 17 Q. Well, let's see about that because, if we go up, please,
 18 to the bottom of page 1, this is your email,
 19 14 December.
 20 "Thanks Jarnail
 21 "This is very helpful and does, I think, clarify the
 22 position very helpfully.
 23 "Just one question of further clarification from me:
 24 "In para 4(iii) the note says?"
 25 Then you quote from it:
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1 You had looked into it carefully enough to be able to
 2 analyse this proposition that claims for malicious
 3 prosecution would stand against Cartwright King and not
 4 POL, yes?
 5 A. I've looked at it enough to try to make sure that the
 6 Board paper answers the questions that I think Chris
 7 wants it to answer, yes.
 8 Q. You obviously read the advice very carefully?
 9 A. I'm sure, in terms of picking out the bit that I needed,
 10 yes.
 11 Q. Are you sure you didn't know about the content of
 12 Mr Clarke's other advice from July 2013?
 13 A. So, to the best of my recollection, I was not aware of
 14 it. As I explained this morning -- so it's clear that
 15 it passed my desk but, at that point, again, I'm as sure
 16 as I can be that I wasn't aware of it.
 17 Q. Even though that was the advice which generated the
 18 Board's concerns about past prosecution and the
 19 potential for their personal liability for malicious
 20 prosecution?
 21 A. I don't know that that was the case because I don't know
 22 what the Board were told about the Clarke Advice.
 23 Q. Is that an answer that you've felt you had to make
 24 because you don't want to put the Board in it, in some
 25 way?
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1 **A.** Absolutely not. I am as keen as many other people to
 2 understand who knew what and when. I have seen nothing
 3 that suggests either way whether the Board knew about it
 4 or not but I certainly would not say anything to this
 5 Inquiry to protect anybody.

6 **Q.** Could we have a look, please, at your statement,
 7 page 25, paragraph 53. Thank you:
 8 "I do not know if any Senior Managers and/or
 9 Directors of POL were concerned about personal liability
 10 for malicious prosecution. If it were ever discussed in
 11 my presence, I have no recollection of it."
 12 Now, we've just discovered, haven't we,
 13 Ms Cortes-Martin, that you were deeply involved in
 14 advising the Board on that very subject, weren't you?

15 **A.** I was --

16 **Q.** Something you forgot about when you made your statement?

17 **A.** No, as I said earlier, I took that question very
 18 literally and I didn't know that they were particularly
 19 worried about it or if they just asked advice on it.

20 **Q.** Really?

21 **A.** Really. At this stage, I had never attended a Board
 22 meeting, to the best of my recollection, on anything at
 23 all to do with this subject. It was an entirely new
 24 subject to me. This subject matter was an entirely new
 25 subject to me. So, if the action arose out of a worry

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1 a subpostmaster would fill in a questionnaire and send
 2 it off to you, as the head, so to speak, of
 3 administering the scheme. So that would instigate their
 4 desire to engage in mediation with the Post Office, yes?

5 **A.** Yes, I think so. The reason I'm hesitating is I can't
 6 remember the point at which the detailed questionnaire
 7 was filled in but there was certainly an initial "I want
 8 to be in the scheme".

9 **SIR WYN WILLIAMS:** Anyway, yeah, if you like, "I want to be
 10 part of the scheme", and then, shortly thereafter or at
 11 the same time, they fill in a detailed questionnaire?

12 **A.** Yes, that's correct.

13 **SIR WYN WILLIAMS:** Right. The questionnaire goes to Second
 14 Sight and it goes to the Post Office --

15 **A.** Yes.

16 **SIR WYN WILLIAMS:** -- or is it sequential? Does it go to
 17 both at the same time or does it go to the Post Office
 18 first to investigate?

19 **A.** To be absolutely accurate on this, I would need to go
 20 back to the scheme documentation but I think it would
 21 have been available to both. It would have been
 22 available to both but the action would be with Second
 23 Sight.

24 **SIR WYN WILLIAMS:** But the way I've understood it is that
 25 the Post Office would then produce its response to the

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1 about it then I wasn't aware of it. If I take it in
 2 a more general sense, then if they -- if the underlying
 3 reason for requesting this advice was concern, then
 4 perhaps my answer's -- perhaps my answer's incorrect.

5 **MS PAGE:** You didn't think you'd mention this work that you
 6 did? Even though the question was about concern, you
 7 didn't think you'd mention this Board paper?

8 No, evidently not. Thank you. Those are my
 9 questions, sir.

10 **SIR WYN WILLIAMS:** Thank you Ms Page. Is that it, Ms Price?

11 **MS PRICE:** Yes, it is, sir.

12 **Questioned by SIR WYN WILLIAMS**

13 **SIR WYN WILLIAMS:** Just to prolong it for two minutes, can
 14 you just talk me through how your recollection of how
 15 an individual application to the scheme actually got
 16 from the beginning to the end, so that I can be clear
 17 that I understand it, all right?

18 Let me simplify it by letting you know what I think
 19 happened and then you can correct me if I'm wrong. All
 20 right?

21 So it would start with Mr X or Ms Y making
 22 an application on a questionnaire, as I understand it.
 23 Is that Step 1?

24 **A.** Yes. Yes, I --

25 **SIR WYN WILLIAMS:** Something would have to instigate it. So

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1 application and then Second Sight would investigate that
 2 response; is that right?

3 **A.** Yes. Second Sight would review the Post Office's
 4 Investigation Report and the evidence provided by the
 5 applicant and Post Office.

6 **SIR WYN WILLIAMS:** Right. Now, if they both said, "This is
 7 fit for mediation", that's fine and that's easy. If
 8 Post Office said, "It's not fit for mediation" but
 9 Second Sight, on review, said that it was, what would
 10 happen then?

11 **A.** There would be a discussion at the Working Group, and
 12 a -- I think there were a couple of changes during the
 13 lifetime of the scheme but a decision would be made. If
 14 there was no agreement, I think Sir Anthony Hooper would
 15 adjudicate, insofar as he would say it should be
 16 mediated. It would then be passed to --

17 **SIR WYN WILLIAMS:** Well, not so fast.

18 **A.** Sorry.

19 **SIR WYN WILLIAMS:** They haven't agreed, so it's discussed in
 20 Working Group. At the end of the discussion, they might
 21 still not agree --

22 **A.** Yes.

23 **SIR WYN WILLIAMS:** -- in which case, Sir Anthony would say,
 24 "Well, actually, I think I'm with the Post Office, so it
 25 won't go any further", or, "I think it should be

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1 mediated", and they would abide by his decision; is that
2 fair?

3 **A.** Not exactly. So Sir Anthony --

4 **SIR WYN WILLIAMS:** That's what I thought. So you tell me
5 what would happen then.

6 **A.** So Sir Anthony Hooper would decide whether or not he
7 thinks it was appropriate for mediation and, therefore,
8 it would be a matter for Post Office to decide whether
9 or not it wanted to mediate.

10 **SIR WYN WILLIAMS:** Exactly. Because we are talking about
11 a mediation, not an arbitration.

12 **A.** Yes.

13 **SIR WYN WILLIAMS:** Fine. So let's assume that, against its
14 "better judgement", in inverted commas, Post Office
15 accepts Sir Anthony's recommendation and says, "Okay,
16 we'll mediate", even though they don't really want to.
17 The next step is to provide information to the mediator,
18 I guess?

19 **A.** Yes.

20 **SIR WYN WILLIAMS:** That would be the detailed questionnaire,
21 the Post Office's response to it and Second Sight's
22 review of it?

23 **A.** Yes.

24 **SIR WYN WILLIAMS:** Anything else?

25 **A.** Yes. As the scheme progressed, a fact file was
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1 power to decide, the reality is that the applicant could
2 say, for the sake of argument, "I want £10,000", and the
3 Post Office could say, "We will only give you £2,500",
4 and it could fail or they could agree on £5,000?

5 **A.** Yes.

6 **SIR WYN WILLIAMS:** That's the way it went?

7 **A.** Yes.

8 **SIR WYN WILLIAMS:** Just like many other mediation, in
9 fact --

10 **A.** Yes.

11 **SIR WYN WILLIAMS:** -- once it got to that stage?

12 **A.** Yes.

13 **SIR WYN WILLIAMS:** So, in your experience, of the 150
14 cases -- I'll ask the Post Office to give me precise
15 figures but, just so I can get a feel for it now. We
16 know that there was approximately 150 cases; in your
17 experience, approximately how many of them succeeded in
18 the sense there was an agreement? I'm not asking for
19 a precise figure, just a feel, at the moment.

20 **A.** So up until the time I left -- and I really can't give
21 you a figure but what I can tell you is that I think
22 CEDR, the mediation organisation, did a report for the
23 Working Group, or it may have been the Select Committee,
24 but the figures are set out in that and it's actually in
25 my evidence pack.

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1 produced, which was available to the mediator and, after
2 Second Sight's part -- so anything that Second Sight had
3 produced as a generic report would also be passed to the
4 mediator.

5 **SIR WYN WILLIAMS:** Would also be part of that?

6 **A.** Yes.

7 **SIR WYN WILLIAMS:** All right. So the mediator gets all of
8 that information?

9 **A.** Yes.

10 **SIR WYN WILLIAMS:** Then, on the appointed day, the
11 applicant, either represented or unrepresented, as the
12 case may be, appears; the Post Office appear, by
13 lawyers, no doubt; and the mediator is present; and
14 a mediation occurs?

15 **A.** Yes.

16 **SIR WYN WILLIAMS:** The mediator tries to nudge parties into
17 an agreement and sometimes it works and sometimes it
18 doesn't?

19 **A.** Yes.

20 **SIR WYN WILLIAMS:** But, ultimately, it only works if both
21 agree. Nobody forces people to do anything. Unless the
22 applicant and the Post Office agree on the result, it
23 fails, the mediation fails?

24 **A.** That's correct.

25 **SIR WYN WILLIAMS:** So when people talk about having the
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1 **SIR WYN WILLIAMS:** Right, there's a document which will give
2 me the precise figures.

3 **A.** But they said that the number of fully settled or fully
4 agreed cases was slightly below the average.

5 **SIR WYN WILLIAMS:** Okay, don't worry. If you can't, you
6 can't.

7 **A.** I'm afraid I can't.

8 **SIR WYN WILLIAMS:** I'll get it from another source.

9 Well, I'm glad, at least, I understood the process
10 of the mediation, so thank you very much. So those are
11 my questions.

12 Thank you for making your detailed witness statement
13 and thank you for giving evidence to the Inquiry today.

14 **THE WITNESS:** Thank you.

15 **SIR WYN WILLIAMS:** So that brings us to an end of today's
16 proceedings, Ms Price, and it's Mr Altman tomorrow, is
17 it?

18 **MS PRICE:** Yes, sir. That's correct. 9.45 tomorrow.

19 **SIR WYN WILLIAMS:** All right. Thank you very much.

20 **MS PRICE:** Thank you, sir.

21 **(3.50 pm)**

22 **(The hearing adjourned until 9.45 am the following day)**

23

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			yeah [2] 131/9 151/9 year [6] 21/2 55/2 57/4 85/11 119/12 129/8 years [2] 4/3 83/17 yes [152] 1/4 1/6 1/16 2/4 3/6 3/16 5/8 5/11 5/15 5/18 5/20 5/24 6/3 6/6 8/9 8/21 9/10 11/17 13/2 13/18 14/4 14/15 14/19 14/25 15/20 16/15 16/18 16/20 17/14 17/19 18/1 18/6 21/21 21/25 27/21 27/22 27/22 29/8 29/22 30/19 34/20 35/2 41/15 43/12 43/19 43/22 43/25 44/17 44/25 49/17 49/25 50/3 54/19 55/3 56/11 57/8 57/10 58/1 58/3 58/7 62/12 63/19 66/18 66/20 66/25 67/6 67/6 67/18 68/13 69/4 71/7 71/21 72/2 75/16 76/1 83/2 89/11 91/22 92/17 92/19 92/25 93/5 93/12 97/6 101/9 101/18 101/25 104/8 104/11 104/15 104/20 104/23 110/4 117/18 118/11 118/16 118/19 120/6 120/19 120/19 121/6 122/25 123/10 125/6 127/16 128/21 130/1 130/3 131/19 132/14 133/13 134/25 137/8 138/7 138/10 138/22 142/15 142/25	

<p>Y</p> <p>yes... [34] 143/1 143/19 143/21 146/6 146/8 147/19 147/20 147/22 147/23 148/4 148/7 148/10 150/11 150/24 150/24 151/4 151/5 151/12 151/15 152/3 152/22 153/12 153/19 153/23 153/25 154/6 154/9 154/15 154/19 155/5 155/7 155/10 155/12 156/18</p> <p>yesterday [1] 132/20</p> <p>yesterday's [1] 128/25</p> <p>yet [3] 29/14 80/10 90/16</p> <p>you [545]</p> <p>you'd [4] 22/10 98/8 150/5 150/7</p> <p>you'll [3] 39/25 45/13 76/23</p> <p>you're [12] 83/17 86/25 94/8 96/21 117/13 118/25 121/3 134/23 135/10 135/21 139/8 142/25</p> <p>you've [9] 16/16 65/2 68/10 76/10 106/4 137/16 143/7 144/16 148/23</p> <p>your [121] 1/9 1/17 1/24 2/3 3/4 3/4 3/13 3/17 3/18 3/23 3/24 4/20 6/7 8/6 9/22 10/12 12/23 12/25 13/6 15/16 15/16 15/18 16/16 16/21 17/10 17/15 17/16 17/20 17/22 22/1 22/9 23/20 27/7 27/11 29/24 34/23 38/12 44/1 44/10 45/6 45/25 46/19 48/21 48/22 48/24 49/13 56/9 57/7 60/7 62/9 63/16 64/17 64/19 66/16 67/2 67/4 67/24 68/11 69/4 69/9 71/14 72/3 74/18 76/3 76/10 76/12 77/8 77/19 80/22 82/9 82/25 85/7 85/23 86/2 88/18 89/4 89/9 91/5 91/19 91/25 94/7 95/22 97/25 99/21 101/1 101/14 104/2 105/9 105/16 106/10 106/20 108/8 110/1 111/8 118/12 118/14 120/4 120/9 120/12 125/18 127/15 129/24 130/11 137/10 137/10</p>	<p>138/20 139/10 139/11 139/18 139/19 140/21 140/23 144/2 146/18 147/23 149/6 149/16 150/14 155/13 155/16 156/12</p> <hr/> <p>Z</p> <p>Zebra [1] 57/8</p>			
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