

**Witness Name** Paula Anne Vennells

**Statement No.** WITN01020200

**Dated** 8 April 2024

**POST OFFICE HORIZON IT INQUIRY**

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**SECOND WITNESS STATEMENT OF PAULA ANNE VENNELLS**

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I, Paula Anne Vennells, will say as follows:

**Introduction**

1. I make this second witness statement in response to the Notice dated 28 March 2024 issued by the Post Office Horizon IT Inquiry (the "**Inquiry**") pursuant to Section 21 of the Inquiries Act 2005 (the "**Section 21 Notice**") in relation to my appearance before the Business, Innovation and Skills ("**BIS**") Select Committee of the House of Commons on 3 February 2015.
2. This statement is supplemental to my first witness statement dated 8 March 2024 (**WITN01020100**).

**Evidence before House of Commons BIS Select Committee on 3 February 2015**

3. On 3 February 2015, I appeared and gave evidence before the House of Commons BIS Select Committee.
4. A transcript of this evidence is available at (**UKGI00003229**).
5. The Inquiry team has set out a number of statements in paragraphs 1.1 to 1.15 of the Annex to the Section 21 Notice and asked me to set out, as at 10:00 on 3 February 2015, (a) which of them I believed to be true, (b) which (if any) I believed to be false and (c) which (if any) I neither believed were true nor false for want of knowledge.
6. I note that some of the statements are lifted verbatim from my evidence to BIS on 3 February 2015, some are paraphrased, and some do not reflect the totality or context of what I said. The statement at paragraph 1.13 is taken from a reply given by Angela Van Den Bogerd to the BIS Select Committee and is not a statement that I made.
7. After 15 January 2015, when the request was made that Post Office Limited (“**POL**”) attends to give evidence, various briefing documents<sup>1</sup> were put together

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<sup>1</sup> These documents included documents, many of which are updated versions of one another, named or headed: *Draft briefing document* attached to email (**POL00219704**); *Draft Qs and As* (**POL00102073**); *Suggested core narrative* (**POL00026697**); *Draft opening statement* (**POL00117061**); *BIS Select Committee: Brunswick guide for witnesses, drafting opening statement, Key facts, Q&A*, all of which were attached to email (**POL00311280**); *Post Office mediation scheme explored: Business, Innovation and Skills Committee explore alleged issues with Horizon IT System on 3 February* (**POL00130845**); *Core Narrative* (**POL00162299**); *ADDENDUM TO Q&A* (**POL00117097**); and *Scheme Key facts* (**POL000117098**).

for me and various preparatory sessions were held.

8. Much of my understanding of the up-to-date position as at 10:00 on 3 February 2015 was drawn from briefing documents that I was provided with on Friday 30 January 2015, which had been put together by members of the senior management team.
9. Updated versions of ten documents<sup>2</sup> were provided by email at 17:59 on 2 February 2015 (**POL00168307**) and I recall having at least some of these in hard copy when giving evidence and immediately beforehand.

Paragraph 1.1: Applications to the Initial Complaint Review and Mediation Scheme (the "**Mediation Scheme**") had taken longer to progress than you would have liked.

10. As at 10:00 on 3 February 2015, I believed it to be true that the applications to the Mediation Scheme had taken longer to progress than POL would have liked.

Paragraph 1.2: The reason for the applications to the Mediation Scheme taking longer to progress than POL would have liked was because it had investigated every single case in the most thorough detail.

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<sup>2</sup> The ten attachments were named: *NARRATIVE BOXES finalised* (**POL00029809**); *Core narrative* (**POL00026697**); *Key facts SC* (**POL00026698**); *BIS select committee Qs and As 1549* (**POL00026699**); *BIS lines of questions from committee final* (**POL00114384**); *BIS Select Committee Members* (**POL00026701**); *Post Office select committee evidence January 2015* (**POL00026702**); *CaseReviewMediationPack1* (**POL00022120**); *PO Response to Westminster Hall debate final* (**POL00026704**); and *Annex F – Letter from Sir Anthony Hooper to Jo Swinson MP* (**POL00102166**).

11. As at 10:00 on 3 February 2015, I believed it to be true that the reason for the applications to the Mediation Scheme taking longer to progress than POL would have liked was because POL had investigated every single case and Second Sight and the Working Group were completing their part of the process, all in the most thorough detail. The reasons for my belief are set out in detail in my first witness statement dated 8 March 2024 (**WITN01020100**), particularly (but not exclusively) in paragraphs 756, 786, 787, 791 and 807.

Paragraph 1.3: The investigation by POL of applications to the Mediation Scheme had been rigorous.

12. As at 10:00 on 3 February 2015, I believed it to be true that the investigation by POL of applications to the Mediation Scheme had been rigorous.

Paragraph 1.4: POL had, where it was able and possible to do so, provided Second Sight with all of the documents it had requested that were pertinent to resolving applicants' cases.

13. As at 10:00 on 3 February 2015, I believed it to be true that POL had, where it was able and possible to do so, provided Second Sight with all of the documents it had requested that were pertinent to resolving applicants' cases.

Paragraph 1.5: When requested, POL had provided Second Sight with whatever information was appropriate on every single applicant in the Mediation Scheme.

14. As at 10:00 on 3 February 2015, I believed it to be true that, when requested, POL had provided Second Sight with whatever information was appropriate on every single applicant in the Mediation Scheme.

Paragraph 1.6: Where a POL investigation into an application to the Mediation Scheme had identified an IT issue, POL had looked into those issues and taken advice on them from internal IT experts.

15. As at 10:00 on 3 February 2015, I believed it to be true that that where a POL investigation into an application to the Mediation Scheme had identified an IT issue, POL had looked into those issues and taken the right advice from our IT experts in the business. To expand upon this, I spoke frequently with Lesley Sewell, POL's Chief Information Officer, who reassured me that POL had liaised with Fujitsu when it was investigating the IT issues in the Mediation Scheme.

Paragraph 1.7: The satisfaction rate of SPMs for the support desk was around 87%.

16. As at 10:00 on 3 February 2015, I believed it to be true that the satisfaction rate of SPMs for the support desk was around 87%. I had been provided with a vast quantity of briefing material prior to the BIS Select Committee hearing and I can only assume that that percentage was a figure that I had been given by my team.

Paragraph 1.8: The satisfaction rate of SPMs for the support desk had improved following changes introduced in 2013 but had always been good.

17. As at 10:00 on 3 February 2015, I believed it to be true that the satisfaction rate of SPMs for the support desk had improved following changes introduced in 2013 but had always been good. I assume that this statement was based on material that I had been given by my team, as I would not have known this independently.

Paragraph 1.9: POL had found no evidence of any miscarriages of justice in relation to prosecutions of SPMs for theft, false accounting or offences under the Fraud Act 2006.

18. As at 10:00 on 3 February 2015, I believed it to be true that POL had found no evidence of any miscarriages of justice. My understanding was that a review of criminal cases had been undertaken by external lawyers and that disclosure had been made to SPMs where appropriate.

19. The information provided to me was that there was no reason to believe that any conviction of an SPM was unsafe. For example, see an email from David Oliver to me on 27 January 2014 (**POL00301554**). I was informed that we were continuing to keep the matters under review. I can see from an email dated 19 March 2014, from David Oliver to Sophie Bialaszewski that, during the course of a meeting with David, I had specifically asked whether there were any unsafe convictions (see page 2 of (**POL00303098**)).

20. The information provided to me for my January 2015 CEO report was that POL had now completed investigations for all cases in the Mediation Scheme. As at that date we had found no evidence of faults with the Horizon system or unsafe

convictions, nor had any been provided by any applicant or Second Sight. We were not aware that any convictions had been appealed. A copy of my January 2015 CEO report is contained in the Board pack for the 28 January 2015 Board Meeting (see page 6 of (**POL00027422**)).

21. I was aware that POL had received a letter from the CCRC asking for information on the criminal cases involved in Sparrow and that the business had 28 days to respond (see page 9 of (**POL00311444**)).

Paragraph 1.10: POL had found no evidence to suggest that the criminal conviction of an applicant to the Mediation Scheme was unsafe.

22. As at 10:00 on 3 February 2015, I believed it to be true that POL had found no evidence to suggest that the criminal conviction of an applicant to the Mediation Scheme was unsafe. My belief was based on the material provided to me in advance of the BIS Select Committee hearing, set out at paragraphs 7 to 9 above.

Paragraph 1.11: POL had completed all of its investigation reports for the applications in the Mediation Scheme.

23. As at 10:00 on 3 February 2015, I believed it to be true that POL had completed all of its investigation reports for the applications in the Mediation Scheme. My belief was based on the material provided to me in advance of the BIS Select Committee hearing, set out at paragraphs 7 to 9 above.

Paragraph 1.12: As soon as the Mediation Scheme started, POL made sure that it did not destroy any data related to it at all.

24. As at 10:00 on 3 February 2015, I believed it to be true that as soon as the Mediation Scheme started, POL made sure that it did not destroy any data related to it at all. My understanding was based on conversations with colleagues in the legal team and briefing notes prepared for me.

Paragraph 1.13: Every application to the mediation scheme was considered by POL on its own merits, including those involving a criminal conviction, whether or not an individual had pleaded guilty.

25. I believed it to be true that every application to the Mediation Scheme was considered by POL on its own merits, including those involving a criminal conviction, whether or not an individual had pleaded guilty. There would be rigorous examination by the Post Office team, which would be reviewed by Second Sight, and lawyers would be involved in that process. However, we had had strong legal advice that it would be unwise to try and finally resolve cases with criminal convictions by mediation, even though they had been admitted to the Scheme, because they could not be resolved by mediation. For all cases, if anything came up in the review process that threw new light onto the prosecution process, that information would be disclosed. We would offer individual face-to-face meetings with the SPM and potentially with their MP. My belief was based on the material provided to me in advance of the BIS Select Committee hearing, set out at paragraphs 7 to 9 above.



Paragraph 1.14: POL had found no evidence that suggested that Horizon was not working as it should be during its two-and-a-half-year investigation.

26. As at 10:00 on 3 February 2015, I believed it to be true that POL had found no evidence that suggested that Horizon was not working as it should be during its two-and-a-half-year investigation. My up-to-date understanding of the position was largely based on the material provided to me in advance of the BIS Select Committee hearing, set out at paragraphs 7 to 9 above. For example, see (POL00026704) at page 7, paragraph 24 and (POL00026702) at page 3, paragraph 17. I was aware that several members of the Sparrow team had had input into the briefing documents provided to me.

Paragraph 1.15: There was no functionality in Horizon for either branches, POL or Fujitsu to edit, manipulate or remove transaction data once it had been recorded in branch's accounts.

27. As at 10:00 on 3 February 2015, I believed it to be true that there was no functionality in Horizon for either branches, POL or Fujitsu to edit, manipulate or remove transaction data once it had been recorded in a branch's accounts. My belief was based on the material provided to me in advance of the Select Committee hearing, set out at paragraphs 7 to 9 above. In particular, see (POL00026699; POL00029809).

Paragraph 2: As at 3 February 2015, did you continue to have confidence in the Horizon IT System?

28. As at 10:00 on 3 February 2015, I continued to have confidence in the Horizon IT System.

Paragraph 3: 3 February 2015

29. I am asked in paragraph 3 of the Annex to the Section 21 Notice whether, before 10:00 on 3 February 2015, I was aware of the matters set out in paragraphs 3.1 and 3.2.

Paragraph 3.1: That Second Sight claimed (a) to have asked POL to provide emails sent in 2008 relevant to an incident it was investigating at a Fujitsu office in Bracknell and (b) that POL had provided some emails sent in 2009 but not 2008.

30. I recall that at some point in 2013, I was aware that Second Sight had asked POL for emails relevant to an incident it had been investigating at a Fujitsu office in Bracknell. The team had told me that they had been asked for an enormous amount of data which required a massive data mining task which needed to be narrowed down. I was not aware that POL had sent 2009 emails instead of 2008 emails. I was aware on a general level that there were issues over emails, but not the specificity of what is set out in paragraph 3.1 above. I did not know that the issues relating to the provision of emails had not been resolved by 2015.

Paragraph 3.2: That Second Sight claimed (a) to have requested full access to prosecution files and (b) that POL had denied it had such access.

31. I can see that I was copied into an email sent by Ian Henderson to Chris Aujard on 16 January 2015 (**POL00102005**) in which he stated "*...POL...so far has not provided the information requested on a number of critical matters, including the Bracknell emails, prosecution documents and full details of transactions relating to the Suspense account*". I cannot recall receiving this email, but I note that it raised a number of different issues.

32. I was not copied into the reply by Chris Aujard, nor into further emails relating to this issue. I note that on 22 January 2015, Belinda Crowe forwarded to the Sparrow team and others, Ian Henderson's email of 16 January, Chris Aujard's response of 21 January and Ian Henderson's further reply of 21 January (**POL00109904**). Belinda said that she had "*alerted Paula to the fact that this is in existence and relevant to the Select Committee. She [Paula] has asked specifically that we have answers to these questions. I assured her we would – Rod will be able to provide answers to these questions.*".

33. It appears from the email above that I sought further information to answer the questions in the 16 January email which I assume I would have asked for having been made aware of the issues. I do not recall receiving any further detailed information on these points and my briefing pack did not contain material on the prosecution files issue.

34. I recall when I gave my evidence to the BIS Select Committee that what Ian Henderson was saying about access to prosecution files was new to me. I had not understood from the legal team what a prosecution file was, that access had previously been provided to this material or whether or not that access had been stopped. I felt under enormous pressure and was completely wrong footed by the exchanges before the BIS Select Committee and I did not want to say anything on an issue about which I did not have a complete understanding. At the same time, I did not want to commit to something which was clearly a legal matter, on which I was not qualified to make a decision. I wanted to go away and make further enquiries so I could give an informed response to the Committee.

Paragraph 4: 24 June 2020

35. The Inquiry team has set out a number of statements in paragraphs 4.1 to 4.32 of the Annex to the Section 21 Notice and asked me to set out, as at 24 June 2020, (a) which of them I believed to be true, (b) which (if any) I believed to be false and (c) which (if any) I neither believed were true nor false for want of knowledge. I note that some of the statements are lifted verbatim from my letter to BEIS dated 24 June 2020, some are paraphrased, and some do not reflect the totality or context of what I said in the letter.

Paragraph 4.1: You had no real involvement with dealing with complaints about the Horizon IT System prior to becoming managing director of POL.

36. As at 24 June 2020, I believed it to be true that I had had no real involvement that I could remember in dealing with complaints about the Horizon IT System prior to becoming managing director of POL. See for example paragraphs 36 to 39 of my witness statement dated 8 March 2024 (**WITN01020100**) for roles and responsibilities in relation to dealing with complaints.

Paragraph 4.2: You had no responsibility for investigators or prosecutors prior to becoming managing director of POL.

37. As at 24 June 2020, I believed it to be true that I had no responsibility for investigators or prosecutors prior to becoming managing director of POL.

Paragraph 4.3: You began engaging with SPMs' concerns regarding the Horizon IT System in about mid-2012.

38. As at 24 June 2020, I believed it to be true that I began engaging with SPMs' concerns regarding the Horizon IT system in about mid-2012.

39. I have seen from disclosure that I was copied in on documents referring to SPMs' complaints about Horizon during 2010 and 2011 which I do not now recall, nor did I when I sent my responses to BEIS on 24 June 2020. The chronology of my engagement with SPMs' concerns is set out in detail in my witness statement dated 8 March 2024 (**WITN01020100**). Some non-exhaustive examples of this are in paragraphs 196 and 1270, of that statement.

Paragraph 4.4: You believed that Second Sight did valuable work in identifying specific areas within POL where there was need for improvement.

40. As at 24 June 2020, I believed it to be true that Second Sight did valuable work in identifying specific areas within POL where there was need for improvement.

Paragraph 4.5: After you became managing director of POL, people at the highest levels of Fujitsu consistently stated to you and the POL board that Horizon was not perfect but was fundamentally sound.

41. As at 24 June 2020, I believed it to be true that after I became managing director of POL, people at the highest levels of Fujitsu consistently stated to me and the POL board that Horizon was not perfect but was fundamentally sound.

Paragraph 4.6: POL spent a great deal of time investigating non-criminal complaints relating to Legacy Horizon and criminal cases were referred to the CCRC.

42. As at 24 June 2020, I believed it to be true that POL spent a great deal of time investigating non-criminal complaints relating to Legacy Horizon and I hoped that these could be resolved through the Scheme. I also believed that criminal cases were referred to the CCRC.

Paragraph 4.7: You played no role in investigatory or prosecutorial decisions or in the conduct of prosecutions brought against SPMs for theft, false accounting or offences under the Fraud Act 2006.

43. As at 24 June 2020, I believed it to be true that I played no role in investigatory or prosecutorial decisions or in the conduct of prosecutions brought against SPMs.

Paragraph 4.8: The team responsible for prosecutions brought against SPMs for theft, false accounting or offences under the Fraud Act 2006 reported to the General Counsel.

44. As at 24 June 2020, I believed it to be true that the team responsible for prosecutions brought against SPMs reported to the General Counsel.

Paragraph 4.9: You first raised the issue of Post Office prosecutions with the then General Counsel shortly after you became CEO of POL.

45. As at 24 June 2020, I believed it to be true that I first raised the issue of Post Office prosecutions with the then General Counsel shortly after I became CEO of POL because I wanted to understand why POL brought private prosecutions.

Paragraph 4.10: Shortly after you became CEO of POL, you were advised that the Post Office prosecution policy was practically necessary because of the pressure on the CPS budget.

46. As at 24 June 2020, I believed it to be true that I had been advised that the Post Office prosecution policy was practically necessary, amongst other reasons, because of the pressure on the CPS budget.

Paragraph 4.11: Shortly after you became CEO of POL, you were advised that Post Office approached prosecutions with the same rigour as the CPS, following the Police and Criminal Evidence Act 1984 and the Code for Crown Prosecutors.

47. As at 24 June 2020, I believed it to be true that shortly after I became CEO I was advised that Post Office approached prosecutions with the same rigour as the CPS, following the Police and Criminal Evidence Act 1984 and the Code for Crown Prosecutors.

Paragraph 4.12: In February 2014, the POL board adopted a new prosecutions policy to focus on the most egregious cases of wrongdoing.

48. As at 24 June 2020, I believed it to be true that the POL board adopted a new prosecutions policy to focus on the most egregious cases of wrongdoing: see **(POL00021424)**.

Paragraph 4.13: Whilst you were CEO of POL, you and the board of POL were assured by in-house and external lawyers that the Code for Crown Prosecutors was being followed by POL.

49. As at 24 June 2020, I believed it to be true that while I was CEO of POL, the POL board and I were assured by in-house and external lawyers that the Code for Crown Prosecutors was being followed by POL.



Paragraph 4.14: POL lawyers considered each case in the Mediation Scheme where there had been a conviction in order to assess whether there was anything that had emerged from the Scheme which POL was obliged to disclose.

50. As at 24 June 2020, I believed it to be true that POL lawyers considered each case in the Mediation Scheme where there had been a conviction in order to assess whether there was anything that had emerged from the Scheme which POL was obliged to disclose.

Paragraph 4.15: Whilst you were CEO of POL, you and the POL board never saw documents known as PEAKs or KELs.

51. As at 24 June 2020, I believed it to be true that while I was CEO of POL, the POL board and I never saw documents known as PEAKs or KELs.

Paragraph 4.16: Whilst you were CEO of POL, you knew that the Horizon IT System had bugs because you had been told about them.

52. As at 24 June 2020, I believed it to be true that while I was CEO of POL, I knew that the Horizon IT System had bugs because I had been told about them.

Paragraph 4.17: You believed that the systems for reporting, investigating and rectifying defects in the Horizon IT System were working as they should have been whilst you were CEO of POL.

53. As at 24 June 2020, I believed it to be true that the systems for reporting, investigating and rectifying defects in the Horizon IT System were working as they should have been while I was CEO of POL.

Paragraph 4.18: E&Y had identified weaknesses in the control and security environment at Fujitsu's operation centres and recommended improvements in its 2011 audit.

54. As at 24 June 2020, I believed it to be true that E&Y had identified weaknesses in the control and security environment at Fujitsu's operation centres and recommended improvements in its 2011 audit.

Paragraph 4.19: As a result of the E&Y 2011 audit, Post Office instructed E&Y to conduct more in-depth audits using the SAS70 model.

55. As at 24 June 2020, I believed it to be true that as a result of the E&Y 2011 audit, Post Office had instructed E&Y to conduct more in-depth audits using the SAS70 model. On reflection, and having had the benefit of reading documents disclosed by the Inquiry, I now realise that this was not a full account of the position in 2011. For completeness, I should have made clear that for E&Y to conduct more in-depth audits using the SAS70 model, Fujitsu needed to put in place reporting systems which could respond to the SAS70 approach.

Paragraph 4.20: E&Y noted improvements to control and security in its 2012 and 2013 audits and made less significant recommendations for further improvements.

56. As at 24 June 2020, I believed it to be true that E&Y had noted improvements to control and security in its 2012 and 2013 audits and made less significant recommendations for further improvements.

Paragraph 4.21: E&Y reported in its 2013 management letter that focused management action had addressed many of the issues raised in previous years' audits.

57. As at 24 June 2020, I believed it to be true that E&Y had reported in its 2013 management letter that focused management action had addressed many of the issues raised in previous years' audits.

Paragraph 4.22: POL decisions in relation to the Mediation Scheme were discussed by an ad hoc board sub-committee consisting of you, Alice Perkins and two non-executive directors.

58. As at 24 June 2020, I believed it to be true that POL decisions in relation to the Mediation Scheme were discussed by an ad hoc board sub-committee consisting of me, Alice Perkins and two non-executive directors. I also recalled as at 24 June 2020 that the General Counsel and company secretary were in attendance and others were also present.

Paragraph 4.23: In or around March 2015, the POL board sub-committee decided not to give Second Sight access to POL's internal prosecution files that were subject to legal professional privilege.

59. As at 24 June 2020, I believed it to be true that in or around March 2015, the POL board sub-committee decided not to give Second Sight access to POL's internal prosecution files that were subject to legal professional privilege. I am no longer able to recall why, in June 2020, I believed that it was the POL board sub-committee which made this decision.

Paragraph 4.24: You had previously raised the issue of remote access with the then CEO of Fujitsu, who said the Horizon IT System was "like Fort Knox".

60. As at 24 June 2020, I believed it to be true that I had previously raised the issue of remote access with the then CEO of Fujitsu, who had said that the Horizon IT System was "*like Fort Knox*": see paragraphs 1299 and 1796 of my witness statement dated 8 March 2024 (**WITN01020100**).

Paragraph 4.25: When you were CEO of POL, you were told by Fujitsu that it was not possible for branch records to be altered remotely without SPMs' knowledge.

Paragraph 4.26: When you were CEO of POL, you believed that it was not possible for branch records to be altered remotely without SPMs' knowledge.

Paragraph 4.27: You only became aware that the information Fujitsu had provided to you on remote access was seriously inaccurate after you had left POL.

61. As at 24 June 2020, in paragraphs 54 and 55 of my letter to BEIS, I was responding to a question (14) about my knowledge in 2015 of whether SPMs' transactions could be accessed and altered centrally without their knowledge. I believed that answer to be true. The question related to the evidence that I gave to the BIS Select Committee in 2015. I had wanted to give an answer to the 2015 BIS Select Committee that was direct and factually accurate and had raised this question repeatedly both internally and with Fujitsu. I had always been given the same answer: that it was not possible for branch records to be altered remotely without the SPMs' knowledge. My belief was also based on the material provided to me in advance of the BIS Select Committee hearing in February 2015, as set out at paragraphs 7 to 9 above.

62. As I said in paragraph 55 of my letter of 24 June 2020, I only became aware from the judgment of Fraser J in the Horizon Issues litigation (see paragraphs 525 to 527 (**POL00022840**)), that the information that I had been given about remote access in 2015 was seriously inaccurate.

63. I would like to refer to paragraphs 1267 to 1443 of my first witness statement dated 8 March 2024 (**WITN01020100**) for a fuller explanation of my understanding of remote access while I was CEO of POL.

Paragraph 4.28: POL took the decision to end the role of the Working Group in March 2015 and push all applicants of the Scheme to mediation, save for where there had been a conviction.

64. As at 24 June 2020, I believed it to be true that POL had taken the decision to end the role of Working Group in March 2015 and push all applicants of the Scheme to mediation, save for where there had been a conviction.

Paragraph 4.29: You believed that it was in the interests of the Scheme applicants for all cases to go to mediation.

65. As at 24 June 2020, I believed it to be true that it was in the interests of the Scheme applicants for all cases to go to mediation.

Paragraph 4.30: The Horizon IT System was raised in most board meetings whilst you were CEO of POL.

66. As at 24 June 2020, I believed it to be true that Horizon had come up in different ways, at the majority of Board meetings.

Paragraph 4.31: The POL board was informed whenever there was a test or audit of the Horizon IT System.

67. As at 24 June 2020, I believed it to be true that the POL board was informed whenever there was a test or audit of the Horizon IT System.

Paragraph 4.32: The POL board was informed of any major outages or faults in the Horizon IT System, and the steps taken to rectify them.

68. As at 24 June 2020, I believed it to be true that the POL board was informed of any major outages or faults in the Horizon IT System, and the steps taken to rectify them.

**Statement of Truth**

I believe the content of this statement to be true.

Signed: **GRO** \_\_\_\_\_

Dated: 08 April 2024

**Index to Second Witness Statement of Paula Anne Vennells**

No.	URN	Document Description	Control Number
1.	WITN01020100	First Witness Statement of Paula Anne Vennells	WITN01020100
2.	UKGI00003229	Business, Innovation and Skills Committee Oral Evidence Transcript: Post Office Mediation, HC 935	UKGI014043-001
3.	POL00219704	Email from Melanie Corfield to Belinda Crowe, Patrick Bourke, Jane Hill, Tom Wechsler, Ruth Barker, Angela Van Den Bogerd and Mark Underwood cc Mark Davies, Rodric Williams, Andrew Parsons, Jarnail Singh and Mike Granville Subject: Select Committee Qs - in strictest confidence and legally privileged	POL-BSFF-0057767
4.	POL00102073	Draft Q and As	POL-0101656
5.	POL00026697	Suggested Core Narrative	POL-0023338
6.	POL00117061	Draft Opening Statement	POL-0117895



No.	URN	Document Description	Control Number
7.	POL00311280	Email from Jane Hill to Mark Davies, Chris Aujard, Patrick Bourke, Tom Wechsler, Mark Underwood, Rodic Williams and Belinda Crowe cc Mike Granville, Melanie Corfield, Avene O'Farrell and Gavin Lambert Subject: Latest	POL-BSFF-0149330
8.	POL00130845	Post Office Mediation Scheme Explored: Business, Innovation and Skills Committee Explore Alleged Issues with Horizon IT System on 3 February	POL-0124305
9.	POL00162299	Core Narrative	POL-0150729
10.	POL00117097	Addendum to Q and A	POL-0117930
11.	POL00117098	Scheme Key Facts	POL-0117931
12.	POL00168307	Email from Jane Hill to Patrick Bourke and Melanie Corfield Subject: RE: PV's materials	POL-0163604
13.	POL00029809	Narrative Boxes	POL-0026291
14.	POL00026698	Key Facts SC	POL-0023340
15.	POL00026699	BIS Select Committee Qs and As	POL-0023340

No.	URN	Document Description	Control Number
16.	POL00114384	BIS Lines of Questioning from Committee	POL-0113311
17.	POL00026701	BIS Select Committee Members	POL-0023342
18.	POL00026702	Post Office Evidence to the Business, Skills and Innovation Select Committee, Complaint Review and Mediation Scheme	POL-0023343
19.	POL00022120	Case Review Mediation Pack	POL-0018599
20.	POL00026704	Post Office Response to Westminster Hall Debate - Complaint and Mediation Scheme	POL-0023345
21.	POL00102166	Annex F – Letter from Sir Anthony Hooper to Jo Swinson MP	POL-0101749
22.	POL00301554	Email from David Oliver to Paula Vennells and Alice Perkins cc Martin Edwards, Jorja Preston, Theresa Iles, Sarah Paddison, Chris Aujard and Rodric Williams Subject: Further briefing for tomorrow	POL-BSFF-0139604
23.	POL00303098	Email from David Oliver to Sophie Bialaszewski and Mark Davies cc Chris Aujard and Belinda Crowe Subject: RE: Feedback from the pre brief	POL-BSFF-0141148

No.	URN	Document Description	Control Number
24.	POL00027422	Post Office Ltd Board Meeting Agenda and Associated Documents dated January 2015	POL-0024063
25.	POL00311444	Post Office Limited Minutes of Board Meeting dated 28 January 2015	POL-BSFF-0149494
26.	POL00102005	Email from Ian Henderson to Chris Aujard cc Belinda Crowe and Paula Vennells Subject: FW: Second Sight's Investigations	POL-0101588
27.	POL00109904	Email from Belinda Crowe to Jane Hill and Melanie Corfield cc Belinda Crowe, Chris Aujard, Mark Davies, Rodric Williams, Patrick Bourke, Tom Wechsler, Andrew Parsons Subject: FW: Second Sight's Investigations	POL-0111112
28.	POL00021424	Post Office Limited Minutes of Audit, Risk and Compliance Sub Committee Meeting	POL-0018054
29.	POL00022840	Fraser J Judgment (No.6) "Horizon Issues"	POL-0019319