

Witness Name: Sir Ed Davey

Statement No.: WITN10610100

Dated: 5 July 2024

POST OFFICE HORIZON IT INQUIRY

FIRST WITNESS STATEMENT OF RT. HON SIR ED DAVEY

I, Sir Ed Davey, will say as follows.

INTRODUCTION

1. I am the leader of the Liberal Democrats and was the Member of Parliament for Kingston and Surbiton from 1997 to 2015 and 2017 to 2024. At the time of writing, there are no MPs since the dissolution of Parliament on 30th May 2024, but I am campaigning for re-election.
2. As relevant to the Inquiry, I was the Parliamentary Under-Secretary of State for Employment Relations and Postal Affairs in the Department for Business, Innovation and Skills ("BIS") from 20th May 2010 to 3rd February 2012.
3. This witness statement is made to assist the Post Office Horizon IT Inquiry (the "Inquiry") with the matters set out in the Rule 9 Request dated 10 May 2024 (the "Request")'. I have prepared it with the support of the Government Legal Department and counsel. I have depended on others putting documents before me to assist with the chronology of events set out below. I have requested that the Department for Business and Trade ("DBT") provide a number of other documents which would have helped me to prepare this statement, such as the minutes of several meetings (including my meeting with Sir Alan in October 2010)

and my ministerial diary, but I am informed that DBT does not hold or is unable to locate these. I have attempted, where possible, to supplement my memory by reference to publicly available records. However, I have needed to rely much more than I would have liked on my own recollection of relevant events, which go back 14 years and arose in the context of an exceptionally busy ministerial diary.

4. Since reading about the High Court judgment in *Bates & Others v Post Office* in December 2019, watching the ITV drama 'Mr Bates vs The Post Office', listening to the testimonies of so many subpostmasters and hearing the evidence elicited by the Inquiry, I have been shocked at the harm done to so many subpostmasters over so many years, and by the scale of the lies told by Post Office Limited ("POL") and Fujitsu – to the subpostmasters, to the courts, to ministers of all parties, including myself, to Parliament, to journalists and to the public.
5. The Post Office Horizon scandal is the greatest miscarriage of justice of our time, and I am deeply sorry for the individuals and families who have had their lives ruined by it. As one of the ministers over the 20 years of this scandal who had postal affairs as part of my ministerial responsibilities, I am sorry that it took me five months to meet Sir Alan Bates, the man who has done so much to uncover all this, and that I did not see through POL's lies when I and my officials raised his concerns with them.
6. I have structured this statement in three sections. In the first section I describe the relevant background and explain the way in which I worked as Secretary of State. In section two I provide a broadly chronological account, setting out what I knew and what I did about Horizon, based on a combination of documentary records as made available to me and my own recollections and observations. In section three, I offer some reflections and suggestions.
7. Having called for the establishment of the Inquiry, I look forward to giving oral evidence to help it get to the truth of what went so catastrophically wrong and

develop recommendations to prevent such a terrible miscarriage of justice ever happening again.

SECTION 1: MINISTERIAL ROLE AND CONTEXT

Background

8. I studied Politics, Philosophy and Economics at Jesus College, Oxford between 1985 and 1988. After graduation, I worked for the Liberal Democrats as their Senior Economics Adviser between 1989 and 1993, during which time I studied at night school in Birkbeck College, London University for an MSc in Economics. I studied labour markets and trade quite extensively, which turned out to be directly relevant to my Employment Affairs and Trade responsibilities during my time as a BIS minister.
9. Between 1993 and 1997 I worked for Omega Partners, a management consultancy which essentially helped businesses understand the economic and market changes that would impact their future. During my four years with Omega Partners, I worked on letters and parcels projects for major overseas postal companies, such as Sweden's Posten. I therefore had some interest in and knowledge of the postal business prior to entering Parliament, though my experience was exclusively overseas.
10. I was first elected to Parliament as the Liberal Democrat MP for Kingston and Surbiton in May 1997. I was re-elected to represent my constituency in the subsequent general elections in June 2001, May 2005 and May 2010, and fulfilled responsibilities on the Liberal Democrat benches and as a constituency MP. I was subsequently re-elected to represent the constituency in the June 2017 election.
11. After becoming a constituency MP, I campaigned to stop the closure of local post offices and to improve the services local people received both from Royal Mail and at their Post Office. Examples include campaigning to allow pensioners to

retain the option of collecting their pension at their local Post Office, reducing queueing times and opposing specific branch closures. During such campaigns, it became even more obvious how important their local post office was to people, how strongly people felt about them and how much people trusted their local sub-postmasters.

12. In the early 2000s, the then Labour Government had implemented the "Network Closure Programme" and my experience of campaigning against the closure of post offices was shared by many Liberal Democrat MPs and candidates and led to the party developing detailed policy on how to both save local post offices and reform Royal Mail. This was given voice in the 2010 Liberal Democrat manifesto pledge in the following terms:

"Give both Royal Mail and post offices a long-term future, by separating Post Office Ltd from the Royal Mail and retaining Post Office Ltd in full public ownership. 49 per cent of Royal Mail will be sold to create funds for investment. The ownership of the other 51 per cent will be divided between an employee trust and the government." (WITN10610101 Liberal Democrats Party - Manifesto 2010 - fair taxes, fair chance, fair future and fair deal document).

Ministerial portfolio

13. On 20th May 2010, I was appointed Parliamentary Under-Secretary of State for Employment Relations and Postal Affairs in BIS under the coalition government. This was my first ministerial post. I remained in that role until 3rd February 2012, when I was promoted to become Secretary of State for Energy and Climate Change.

14. My ministerial responsibilities were very wide-ranging. They were described in "*The List of Ministerial Responsibilities*" published in July 2010 (WITN10610102 , List of Ministerial Responsibilities Cabinet Office July 2010) as:
- Postal affairs (Royal Mail and Post Office Limited)
 - Employment relations (including ACAS)
 - Consumer policy and consumer affairs
 - Competition policy
 - Corporate governance
 - Company law (including Companies House)
 - Social enterprise
 - Insolvency service (including company investigations)
 - General oversight of Shareholder Executive and its portfolios
 - Coordination of European business
 - Export Credits Guarantee
 - Department Trade Policy
15. In fact my portfolio was even larger than this suggests, and my responsibilities continued to grow during my 20 months in post. For example, I was also responsible for the Groceries Supply Code of Practice and our proposed legislation for a Groceries Code Adjudicator; I ended up with responsibility for the Land Registry and the Met Office, as we considered setting up a "Public Data Corporation"; and the Prime Minister (David Cameron) asked me to take charge of Corporate Social Responsibility and to oversee a review of the future of high streets undertaken by Mary Portas. I was also involved in the department's work to deliver the Government's deregulation agenda. All these responsibilities led to me attending a wide range of Cabinet sub-committees.
16. Indeed, within these roles, I had a long list of Coalition Agreement policies to take forward, in addition to ministerial responsibility for this wide number of policy areas and organisations. While the Programme for the Coalition Government could not and did not cover everything the Government was doing, it helped set

priorities for ministers, so I have included relevant extracts related to my work in Annex 1.

17. Before I detail this ministerial work, it is worth adding that, as for all MPs who are ministers, I also had my normal work for my constituents, as the local MP for Kingston and Surbiton, from advice surgeries to correspondence, from visits to local campaigns.
18. In addition, as I was a Liberal Democrat minister in a Conservative-led government, I was required to keep abreast generally of issues handled by other ministers in the department even though these did not fall within my own ministerial portfolio.
19. It is probably obvious, but worth emphasising, that my time as a minister was immensely busy with many competing priorities. A bureaucratic system was in place in order to manage my time and ensure that I was receiving the information, advice and support from civil servants that I needed. I describe this system, which centred around the ministerial private office, later in this section.
20. In order to give a flavour of the various areas for which I was responsible and which were competing for my attention, I set out in Annex 2 some examples of the sort of work that fell under my remit in each of my policy areas, aside from Royal Mail and the Post Office.
21. My duties in the House also meant I covered a wide range of issues raised by Members of Parliament in adjournment debates, in Private Members' Bills etc, etc. A comprehensive list is attached in Annex 3, but they ranged from Dental Bleaching and its regulation to Debt Management Plans, from Country of Origin Marking to Unscrupulous Builders, from the Daylight Saving Bill to the Canterbury City Council Bill.

22. I also represented the UK Government at a variety of international summits and meetings, especially numerous European Council meetings. A list of my overseas travel as BIS minister (as published online by the Department at the time) is set out in Annex 4 – averaging roughly one a month across my time in the post.

Postal Affairs brief

23. The Postal Affairs brief was therefore just one part of a relatively large junior ministerial portfolio, though it is fair to recognise it was an important part and at times took up a lot of my time.
24. My main responsibilities with respect to postal affairs essentially divided into two – the work on Royal Mail primarily aimed at bringing in private capital, and the work on the Post Office, primarily aimed at helping prevent further closure programmes.
25. These workstreams were to some extent inter-related, as Post Office Limited was a subsidiary organisation within The Royal Mail Group, and as our policy was to separate The Post Office from Royal Mail Group ahead of the privatisation, with inevitable questions about the transition and the nature of relationship between Royal Mail and the Post Office, after the separation.
26. Under the law, both Royal Mail Group and the Post Office operated at arm's length to ministers and we did not get involved in issues related to day-to-day operations – be they their business plans, their workforce relations, their commercial strategy or their IT systems such as Horizon.
27. Instead, my core ministerial responsibility was in relation to *Government-related* strategic issues that could affect the viability of both businesses and the service

to the public – so in the case of Royal Mail that meant its losses, its huge pension deficit and the existential challenge to a letters business posed by electronic communications, and in the case of the Post Office the continuing threat to the viability of its network and branches due to declining footfall, the digitalisation of Government business and the impact of a wider decline of the bricks and mortar retail sector.

28. The transparency disclosures published online by BIS suggest that I had a total of 247 formal ministerial meetings during my time in the Department. It appears I met with POL 22 times; Royal Mail 15 times; the Communication Workers Union (“CWU”) 12 times and the National Federation of Sub-Postmasters (“NFSP”) 9 times (note that some of these overlap where, for example, I had a meeting with both POL and NFSP). It lists a further 14 meetings to discuss postal affairs, issues or services, including the meeting with Sir Alan Bates in October 2010.

Royal Mail

29. My work on Royal Mail was extensive, not least because the policy was seen as one of the Coalition’s more controversial proposals, especially in the light of two previous failures to inject private capital into the country’s letters and parcels business, under both Michael Heseltine and Peter Mandelson.
30. This work was also urgent, as I had been asked to have the legislation ready for the Autumn. Indeed, the Postal Services Bill had its First Reading in Parliament on 13th October 2010, just 5 months after the general election.
31. I benefited in that intense work from a report by Richard Hooper, and his update, and because the previous Government had introduced legislation to bring in private capital back in 2009.

32. However, the previous Government's Bill did not reflect the Coalition's policy fully and, to my mind, needed significant change. For example:
- The amount of private capital investment envisaged was too little;
 - The protections for the universal service were too weak;
 - There was no provision for employee share ownership;
 - The regulatory regime needed strengthening;
 - There was no provision for change in the future governance model of Post Office Limited.
33. While the legislation primarily dealt with Royal Mail, Part One of the Act dealt with the Restructuring of the Royal Mail Group, including setting out how the Post Office would be separated from Royal Mail, how the Post Office would remain in the public sector, with the new provision we developed, namely an enabling clause for the option for The Post Office to be mutualised in the future.
34. My work on this Bill began in earnest directly after the election, with many meetings with officials and several with stakeholders, such as the CWU and the NFSP.
35. The Postal Services Bill had its Second Reading on 27th October 2010, followed by 20 sittings of its standing committee, from 9th November 2010 to 9th December 2010, with its Commons Report Stage and Third Reading on 12th January 2011, before going to the Lords, where it concluded its passage by summer 2011.
36. In addition to the work for the Parliamentary passage of the legislation, work with officials and with stakeholders was intense during this whole period. This was primarily linked to Royal Mail and the letters and parcels business and covered everything from how we would deal with the huge deficit in the pension fund of Royal Mail employees to how we would give Royal Mail employees shares in the new business and even how we would ensure that the sovereign's head remained on stamps after private ownership was introduced.

37. The Post Office work in relation to this Bill is covered below.
38. In addition to the work on the legislation concerning Royal Mail's future, my other Royal Mail work was extensive. From obtaining state aid approval for our Royal Mail pension deficit plan to the transfer of regulatory responsibility from Postcomm to Ofcom, from the contractual relationship between Royal Mail and the Post Office after the sale and to how the ambitious employee share ownership proposals in the Bill would be realised.
39. After the passage of the legislation in the summer of 2011, the focus turned to the work preparing for the sale of shares in Royal Mail. This was extensive and was far from completion by the time I left my role in BIS.

Post Office

40. My work on the Post Office had two main elements – first, in relation to making the Post Office Network more sustainable for the long term, to prevent any future closure programmes for the national network of post offices; and, second, in relation to the Postal Services Bill, as the Post Office was separated from Royal Mail.
41. Our top political commitment on post offices was to avoid another closure programme – and that drove my work.
42. We had to develop a vision for the Post Office which maintained its vital and distinct social purpose, but also made it more financially viable. Moreover, in order for us to win a long-term commitment of Treasury funding for the Post Office, we had to prove that both the Department and the Post Office had in effect

a new business model that, over time, would reduce the need for large-scale subsidy in the future and/or post office closures.

43. After months of hard work, we made the key Government policy statement on the Post Office in November 2010, in a document called "*Securing the Post Office Network in the Digital Age*" (WITN10610103, Coalition Agreement for stability and reform between the Conservative and Liberal Democrat Parliamentary Parties). As the name suggested, avoiding closures was not going to be easy. Customers using the Post Office had fallen sharply in the previous decade. Its revenues from Government had been slashed, as Government payments like pensions were increasingly being paid direct into people's bank accounts, and many people were fast taking up online services.
44. My early work on this policy statement was primarily with BIS officials though I recall the occasional meeting with the then-Managing Director of the Post Office, David Smith. Indeed, a key part of that early work was to challenge Post Office Ltd itself to come up with a strategy to make it more relevant to customers. They proposed what became known as the Network Transformation Programme ("NTP") – a major internal restructuring, which, after piloting eventually went live in 2012, was due to run into the following Parliament. In fact, in the course of preparing this statement, I have learnt that the NTP went on until 2018.
45. At its heart, NTP aimed to convert traditional post offices to either "Post Office Main" or "Post Office Local" business models – with the underlying economic analysis for both being a combination of policies to increase demand and changes to reduce costs. So, for example, Mains would be open for longer hours. Both Mains and Local would be further integrated into existing retail premises like newsagents, convenience stores and petrol stations.
46. As minister, I had to approve this new commercial model, as part of our bid to Treasury and as what I and the department believed was a credible model. A

combination of the results of pilots and meetings with stakeholders like the NFSP helped to reassure me.

47. The political decisions for me as a minister, separate from agreeing the Post Office's own proposals, were mainly over:
- Subsidy levels;
 - Re-thinking the role of the Post Office;
 - Changing the governance of the Post Office.
48. **On subsidy levels**, I was fortunate in that the then-Chief Secretary to the Treasury was a big supporter of post offices who represented a highly rural Scottish constituency and had long fought closures of post offices. I felt that the £1.34 billion we secured from the Treasury to support the NTP and our overall strategy for the Parliament was a big win.
49. **On re-thinking the Post Office's role**, this was obviously done in collaboration with POL, but it needed significant political and departmental push and initiative. The 2 main planks of this work were:
- (1) "The Front Office of Government" at national and local levels;
 - (2) Major expansion of the Post Office into accessible financial services.
50. I saw the **Front Office of Government** concept as complimentary to the push to put government services online, with the role of the Post Office to be the face-to-face option, for people who could not access the internet and for services that could not be delivered online. However, over my time in BIS, this turned out to be a difficult sell across government, and appears not to have been delivered to any great extent.
51. Different categories of service were developed from "identity verification" e.g., for driving licences or Home Office documents, to "processing" documents e.g., for passport services or benefit applications.

52. A considerable part of the limited time that I spent on the Post Office through 2011 was trying to push this model with other government departments and local authorities. I felt that if we developed a suite of central and local Government contracts for sub-postmasters, it could both increase their income and the footfall. However, success proved limited compared with the ambition.
53. Moreover, I also saw the expansion of the Post Office's role in financial services as a real option for extra business, and it was also a way of part-delivering on the Coalition's Programme for Government, which included a pledge to consider a Post Office Bank. The analysis of that specific proposal was not promising and there soon turned out to be little political support for it, at higher levels – not least because we were already establishing the British Business Bank and the Green Investment Bank. However, with High Street banks responding to the financial crash by cutting services, and with the clear intent of the main banks to cut back significantly on their presence on the High Street, there seemed to me a genuine market opportunity, which could both support the network and help consumers and small businesses.
54. Both departmental officials and the management of the Post Office seemed less keen on this idea, arguing that such a model would not deliver specific income streams. However, I decided to push ahead – with my main ambition set out in the November 2010 policy statement as being that *“all UK current accounts will be accessible through the post office network making post offices the convenient place for people to access their cash.”*
55. This link with the banking sector did actually take off and resulted in formal arrangements between the banks and the Post Office, currently in an agreement, known as 'Banking Framework 3', where customers of 30 bank and building society brands can use Post Offices to withdraw and deposit cash in their accounts. They can also deposit cheques and make balance queries.

56. There were a few other aspects to my ministerial work on the financial services aspect – with the main one being my attempt to link up credit unions with the Post Office network. This would have helped another of my ministerial tasks – trying to tackle problems with high-cost credit, payday loans and loan sharks.
57. On **changing the governance of the Post Office**, the Postal Services Act implemented our policy of separating POL from the Royal Mail Group, with its own Board of Directors, including a non-executive director from the Shareholder Executive (“ShEx”) representing BIS.
58. This change in governance was important in my view. My hope for the Post Office, especially in relation to the NTP, was that, freed of the lack of attention it had received in the Royal Mail Group and constituted as a separate standalone organisation, it would perform better for both the public and subpostmasters.
59. However, the Act also created new powers to mutualise the Post Office in future. This was an idea put forward by the NFSP. They wanted subpostmasters to be free of the control of the state-owned central company. And in my discussions with them on this and other issues they did not seem to like POL and its management.
60. I was attracted to this idea of mutualisation as it held out the prospect of a more dynamic Post Office, with a better incentive system and a better relationship between the management and subpostmasters, and it seemed a logical future development for the new standalone company.
61. I commissioned a comprehensive report (WITN10610104 The Coalition: our programme for government by David Cameron and Nick Clegg) from Co-operatives UK, which was published in May 2011 (WITN10610105 The Co-Operative UK Mutual Options for Post Office Ltd), and in September 2011 I

launched a consultation titled 'Building a Mutual Post Office'. The Government's response to that consultation was published by my successor, Norman Lamb, in May 2012 (WITN10610106 BIS Building a mutual Post Office - The Government's Response). It set out the Government's next steps towards mutualisation while emphasising the need to achieve "financial stability and commercial sustainability" first.

62. It does not appear that progress has been made towards mutualisation since the 2010-15 Parliament, although I note with interest that the idea has come back onto the agenda recently, with a ministerial meeting to discuss it with union and co-operative representatives reportedly taking place in February this year (WITN10610107, The Guardian Article: 'Constructive' talks held over transfer of Post Office ownership to operators).

How government works

63. I had not expected to be a minister prior to becoming one in May 2010 and so had not thought about it or received any training. Moreover, within the Liberal Democrats there was no history or experience of MPs becoming ministers, so it felt like being thrown in at the deep end. As a junior Liberal Democrat minister in the coalition government, I did not have the benefit of any special advisers to help me either.
64. I did seek advice early on from a friend of mine who had served as a senior civil servant, and she stressed the importance of thanking your officials – as ministers were highly reliant on officials to get their work done (and it being the right thing to do!).
65. So from day one – and for many months afterwards, as I "learnt the ropes" – I was very much guided by the civil servants in my private office in terms of all aspects of the job. They always seemed highly professional and organised. I like

to think I was giving clear political direction – not least from the Coalition Agreement – but as I began gradually to understand both the role of minister and read myself into the many areas I was responsible for, I was inevitably heavily reliant on their advice and guidance. I recall the officials from my private office regularly consulting me on my diary, including future engagements, and trying to understand how I wanted to work, combining time in the Department, in Parliament, in the constituency and with my family.

66. A key part of the work was led by the ministerial red box – which you were given every evening and weekend to work through by your private office. The private office operated as the buffer between you as a minister and the rest of the department and indeed the rest of government. Their job in preparing your nightly red box was to ensure you had all the information you needed or had requested. Indeed, a key part of a red box was the diary and briefing folder for the next day – containing all the papers the private office felt you needed to prepare you for your ministerial work the next day.
67. It was immediately obvious that you had to prioritise because there was just so much to learn and to do. I found officials very knowledgeable and enjoyed engaging with them and felt their advice was generally of very high quality and, given both the complexity of Government and the sheer breadth of my responsibilities, I was grateful for the way they always seemed to produce objective and impartial information, backed up by evidence and experience.
68. Due to the breadth of my responsibilities, I seemed to be engaging with a very large number of different civil servants, and outside Government agencies. One issue relevant to this inquiry was how I engaged with BIS officials and ShEx officials and, from my perspective as a minister, I didn't really see them as especially different: they were all part of the civil service machine there to assist me.

69. As previously touched on, the vast majority of letters and Parliamentary questions I dealt with as a minister would come to me from my private office in my ministerial box. Officials in my private office would decide which letters to put in my box for my attention and reply.
70. The full contents of my red box always varied – in subjects and in length – but mine would regularly take at least 2 hours to complete, and sometimes longer, partly because I was responsible for so many different areas. I would normally do my red box once I got home, and I would regularly work very late into the night to complete it.
71. Essentially a red box would contain submissions from civil servants seeking decisions on everything from policy options to whether you wanted to have a meeting, submissions from civil servants to brief you before a meeting, submissions with drafts of speeches, those parts of the correspondence sent to you as a minister that they felt you needed to see and to reply to, with draft replies already prepared, and drafts of parliamentary answers to questions MPs had tabled. These were usually put towards the bottom of the box and there were usually a large number of these on any given day. There was invariably a lot of paper to get through every night.
72. The private office also managed the correspondence – letters and emails – addressed to me, and would make decisions about which of it I needed to see and when.
73. Generally speaking, where letters were received from an MP or a very important stakeholder (such as a recognised trade union), any letter in response would go out in my name and I would sign it – but the draft response would be prepared for me by the relevant department officials. My nightly red box would generally contain something like 20 to 25 of these, though this could vary significantly.

Sometimes you would only be provided with the draft response, and sometimes you would also be given a copy of the letter which it was responding to – there was no rule, and officials used to exercise their judgement about what you needed to see. There was so much paper, it would have been impossible for officials to provide everything.

74. Where the issues raised in correspondence were more difficult and/or required me to think about them carefully, officials would bring them to my attention specifically – and normally face-to-face. As I explain below, the second letter from Sir Alan Bates is an example where this happened: officials (I think in my private office) highlighted the letter to me and asked me what I wanted to do.
75. Unless officials highlighted specific correspondence in this way, I would generally be content to follow the advice of officials and sign off the draft letters in the red box without spending too much time on them, unless there was something particular that struck me when reading them.
76. Where the letter was not from an MP or key stakeholder, generally officials would respond. We receive so much correspondence, ministers would have no time to do anything else if they replied personally to every letter. I am aware of the evidence of Alan Milburn in Phase 2 of the Inquiry (2nd December 2022, from page 49 line 3), where he described the sheer volume of work to get through as a minister:

“You know, it's difficult, I think, for people to understand, who haven't been in government, just how much stuff there is. You know, you're getting a lot of stuff coming at you all the time and there's a lot of correspondence, a lot of, nowadays, emails, and so on and so forth. So there does have to be some filtering mechanism, you know, because, otherwise, it just -- you're faced with an avalanche that it's just impossible to deal with... I don't want to, in any way, give the impression that ministers are victims in all of this because, in the end, you're in government, you know, you're responsible for what happens in your

Department, that's the rule of the game, so to speak, even though, very often, to be perfectly honest, there are things that are happening in your Department that you have absolutely zero line of sight of, because it's almost impossible to have any line of sight of it...I mean it's a crazy way of life. I mean, you know, there's a reference to Alistair and Steve and I on Christmas Eve having a conflag about whatever it was in relation to Horizon, that wouldn't be unusual. There's another reference somewhere to meeting at 12.30 in the morning, trying to cobble together a decision. I mean, these are not unusual things. So it's a very intense thing to do, it's the most purposeful thing I've ever done in my life and I don't regret a moment of it. But it is -- it's pretty busy."

77. My own experience is very similar. Officials would generally respond to letters from individual members of the public.

Career after BIS

78. I continued to serve as Parliamentary Under-Secretary of State for Employment Relations and Postal Affairs until 3rd February 2012, when I was promoted to become Secretary of State for Energy and Climate Change. I served in that post, alongside my role as MP for Kingston and Surbiton, until the May 2015 general election, at which I lost my seat.
79. As Secretary of State, I had numerous wide-ranging responsibilities, including: taking an Energy Bill through Parliament, from its first reading in November 2012 to its final passage in December 2013, which transformed the UK's electricity industry and dramatically increased investment in renewables; leading the UK delegation to three UN Climate Change Conferences; launching new government strategies on Community Energy and Fuel Poverty; and implementing a range of initiatives to promote energy efficiency and home insulation.

80. Between May 2015 and my return to Parliament at the June 2017 general election, I was not an MP and took on a number of roles, both paid consultancy and voluntary advisory positions – mostly related to my interest in renewable energy. My main focus in taking on paid roles, beyond earning a living, was saving money to support my severely disabled son John, who needs 24-hour care now and for the rest of his life.
81. In line with the Ministerial Code, I sought advice from the Advisory Committee on Business Appointments (“ACOPA”) before taking up these roles, and in each case the Committee advised that there was no reason for me not to do so.
82. In September 2015, I was appointed as Chairman of Mongoose Energy, a community energy co-operative company, and separately began providing consultancy services to the law firm Herbert Smith Freehills (“HSF”) in relation to energy and climate policy.
83. I have since learnt from media reports that HSF acted for POL from 2019 – several years after I took up my role with them. HSF is a large company with thousands of clients, and I had no knowledge at the time I worked with them that it was separately representing POL. I never had any conversations with anyone at HSF about the Post Office or the Horizon scandal.
84. In January 2016, I took on a part-time role as a consultant for MHP Communications, advising its clients on communications and government relations. The following month, I was appointed as a Non-Executive Director at Nord Engine Capital, an investment firm, to advise and assist them on the use of their clean technology fund. I also did a number of smaller pieces of consultancy work for a variety of clients, all in the area of energy and climate change.
85. In April 2016, I became a trustee of Tourism for All, a charity focusing on accessible tourism, and in July 2016 I became a patron of the Sustainable

Futures Foundation, a charity promoting environmental sustainability for the public benefit. Also in 2016, I became a member of the Advisory Board of ENGIE UK, a low-carbon energy supply and services company. In February 2017, I was appointed to the Advisory Board of Next Energy Capital, a specialist investment and asset management firm in the international solar sector.

86. All of this work has been on the public record for several years now, because the advice of ACOBA is published on their website.
87. I returned to Parliament as MP for Kingston and Surbiton at the 2017 general election, and was re-elected in December 2019. Immediately following the 2019 general election, I became Acting Leader of the Liberal Democrats, and was elected Leader in August 2020.
88. After being re-elected in 2017, I dropped most of my consultancy work, but continued working for Mongoose Energy, HSF and Next Energy Capital, not least to be able to continue to fund extra care support for my disabled son. However, by February 2022, I had ended all such consultancy work, and I have closed my consultancy firm, Energy Destinations.
89. During my time as an MP, all of my business and charity roles have been properly declared on the Register of Members' Financial Interests, in line with the Code of Conduct for MPs.

SECTION 2: MY KNOWLEDGE OF HORIZON

90. In this section, I provide a broadly chronological account of what I was told and what I did in relation to Horizon.

91. It is worth emphasising at the outset that, whilst it is now clear that there were disastrous problems with Horizon – and with the Post Office’s conduct towards subpostmasters – which are now rightly the focus of this public inquiry, that was not at all clear at the time. I was responsible for a large number of important issues across a very broad portfolio, and with respect to all the issues I dealt with in Postal Affairs, the Horizon issue was one amongst many – and indeed, I was continually advised it was a matter for the Post Office, because it was a day-to-day operational issue.
92. With all issues in such a busy portfolio, you had to be able to rely on the advice of civil servants, and you were not in a position to dig into the detail of every question that came across your desk. As I have stated publicly, I believe I was seriously misled by the Post Office. I do not know if one or more civil servants misled me during my time as a minister, or if they were themselves misled by POL. I hope the Inquiry can shed light on this. However, if I had known then what we all know now – if the Post Office had told the truth – of course I would have acted differently.

Initial knowledge

93. I was appointed Parliamentary Under-Secretary of State for Employment Relations and Postal Affairs on 20th May 2010.
94. I cannot recall having an initial briefing on Royal Mail and the Post Office, though I expect I did, during my first weeks in office. However, I am very confident that I did not receive any specific briefing on the Horizon system, nor was it something that it would have occurred to me to ask for specific briefing on. My concern with POL was primarily at the level of strategic policy, which was a consequence of the fact POL was an arm’s-length body. I did not expect to be involved with operational matters such as staff, buildings or IT systems. I was not aware of the

Horizon system in particular, though of course I would have realised that POL would have a computer system used in Post Office branches.

95. As far as I recall, I was unaware of any complaints made by subpostmasters as to the integrity of the Horizon system before I took office. Nor was I briefed on this issue on taking up my ministerial role. Nor was I aware that the Post Office / Royal Mail Group themselves investigated, prosecuted and obtained convictions against subpostmasters.

Sir Alan Bates

96. On 20th May 2010 – the day of my appointment – Sir Alan Bates (on behalf of the Justice For Subpostmasters Alliance, “JFSA”) wrote a letter to me (UKGI00016119, Letter from Alan Bates on behalf of Justice For Subpostmasters Alliance). In that letter, he explained the history of Horizon and – in forceful terms – referred to JFSA’s allegations. He asked for a meeting “*where we can present our case to you*”.
97. I have no memory of receiving or reading this letter, and (consistent with the usual departmental practice) I think it unlikely that it was provided to me. Reading it now, the letter is strongly expressed and I would be surprised if I did read it. On the other hand, I note that the draft response says that “*I do appreciate your concerns*” – which may suggest I was shown the letter. If I was shown a copy, it was certainly not flagged up by officials as a letter which I needed to give serious thought to or which raised important issues in which I should consider digging into.
98. I was, however, given a draft response prepared by officials. This would have been one of many – probably around 20 or 25 – such draft responses that I would have been asked to sign overnight, as was the case most nights. As a minister it is necessary to rely heavily on the judgements of the officials advising you,

including in relation to correspondence – otherwise Government would grind to a halt.

99. The draft response declined the suggested meeting. The reason given for this refusal in the letter was that the Horizon system was an operational matter for POL, which was an arm's-length body. That accorded with my understanding of the relationship between the Government and POL at the time: it was not my role as a minister to intervene in POL's day-to-day operations. I understood this to be the case for practical reasons: ministers did not get involved in the day to day running of the business. That made sense to me. I was not qualified to, and would not have had time to, get involved in the day-to-day running of POL.
100. Though I do not recall my response, I would have read it at speed and signed it in reliance on the advice of officials without giving the matter any deep consideration – there would have been nothing in this draft response which would have made me think that this was an important issue that officials were getting wrong and which I needed to grapple with. The signed letter was sent to Sir Alan on or shortly after 31st May 2010 (ABAT00000001 Letter from Edward Davey MP to Alan Bates re answer to his request for a meeting).
101. On reflection, and with the benefit of hindsight, I am really sorry that I followed the advice and did not question it, and I can also see why Sir Alan took offence at the phrase "*I do not believe a meeting would serve any useful purpose*". It was poorly judged, and I apologise to Sir Alan for signing it off.
102. I should have accepted Sir Alan's request for a meeting when he first made it. However, I remain unconvinced that an earlier meeting would have changed the course of events. I expect that I would have put the same questions to my officials and POL, and received the same categorical assurances about the integrity of Horizon that I did later that year.

103. I received a second letter from Sir Alan dated 8th July 2010 (UKGI00016099, Letter from Alan Bates to Edward Davey MP, re Justice for Subpostmasters Alliance) In that letter he criticised my response to his previous letter and stated *"You can listen to your civil servants telling you these issues are really an operational matter for POL to deal with. You can even listen to POL telling you Horizon is wonderful, that there has never ever been a problem, it is inherently robust and these are just a few malcontents trying to cause trouble. Or you can meet with us and hear the real truth behind Horizon and what the Post Office is actually up to."* He gave some concrete examples of his allegations against the Post Office.
104. I recall being shown that letter by officials (probably in my private office) and being asked what I wanted to do. Realising that Sir Alan was quite cross with my initial reply, and reflecting on the seriousness of the concerns he was raising, I told my officials I wanted to meet him. I do not remember what, if any, advice my officials gave me at the time, but I did then meet Sir Alan on 7th October 2010. I note that Mike Whitehead's briefing dated 5th October 2010 (UKGI00000062, Briefing/Update for Edward Davey ahead of meeting with Alan Bates (JFSA)) stated that officials recommended offering a meeting "for presentational reasons". As far as I can remember, that briefing – long after the meeting had been arranged – was the first time that "presentational reasons" for the meeting were mentioned to me. They were certainly not the reason I decided to meet Sir Alan Bates following his second letter. As set out above, I told officials I wanted to meet him because I could see he was cross at my initial response and wanted to hear his concerns directly.
105. My meeting with Sir Alan took place on 7th October 2010 (having been rescheduled). Shortly ahead of this meeting, I received a written briefing dated 5th October 2010 from Mike Whitehead, a civil servant in ShEx. I have been shown by the Inquiry an email dated 21st July 2010 from Oliver Griffiths, a civil servant in ShEx, to David Smith (POL00417098 Email Tracy Abberstein on behalf of David Y Smith to Mike Granville, Martin Humphreys, Lesley J Sewell cc

Mike Young re FE Justice for SPMS), stating *"We have to date said that this is an operational matter for POL and resisted calls to impose a review of Horizon etc. We are in theory happy to continue holding this line - but if we do so and it turns out that there have been problems with Horizon, then there will be significant political heat. Grateful therefore if you could let me know how confident POL is that there is nothing behind these claims."* I did not see this document at the time and I was not consulted on or aware of its contents. In particular, I had not been asked whether I was happy to hold the line that any consequences flowing from faults in Horizon was an operational matter for the Post Office, and I believe the "We" in this sentence relates to the civil servants in ShEx. I imagine the reference to "political heat" was intended to make the point that MPs and also I and my colleagues in government would be incredibly unhappy if it transpired that we had not been given the full truth by ShEx and/or the Post Office – as has proved to be the case.

106. The briefing set out the following advice:

"Our objectives

Tactically we would advise that you seek to establish at a very early stage whether legal action against POL is imminent/planned. If so, it would be prudent to adopt a 'sub judice' approach in the comments you make.

o Emphasise that the issues raised by the JFSA are operational and contractual matters for POL.

o Make clear that, as the shareholder, Government has an arm's length relationship with the company and does have any role in its day to day operations.

o Establish whether, as reported, the JFSA is committed/planning to initiate legal action against POL.

o If so, note that it will be for the relevant legal process to decide on the JFSA case and that the issues are effectively sub judice.

o Demonstrate that you are prepared to hear the JFSA's side of the story (JFSA claim both POL and officials are covering up the problems with Horizon) but make clear that if you are not in a position to offer substantive comment.

o Avoid committing to set up an independent/external review of Horizon."

107. It went on to state as follows:

"The NFSP are dismissive of the JFSA's claims. They have suggested that if there were systemic faults with Horizon as claimed, there would be incidents of 'averages' as well as 'shortages'. NFSP are also of the view that in some of these types of cases the subpostmaster genuinely is not to blame but that a member of his/her family or other employee is. Contractually however the subpostmaster is personally liable. Horizon system and POL process on accounting irregularities

Integrity of the Horizon system

The Horizon system has been in place for over 10 years. In a typical month the system conducts around 80 million customer sessions with 230 million transactions across the system. This is delivered through around 35,000 counter positions in around 12,000 Post Offices which perform weekly and monthly accounting balances. Around £175m per day is settled to over 700 client companies who use Post Office Ltd - a substantial flow of data to and from organisations with regularly audited accounts. Over its extensive period of operation the system has proved robust. The cases identified by JFSA where there is some kind of allegation in respect of the system are a miniscule proportion of the many millions of accounting events that subpostmasters have done within the system. Furthermore around 15% of POL's transactions have been conducted over Crown Office terminals which run exactly the same system yet no issues have been identified. If there were any systematic

integrity issues within the system they would have been evident over the past 10 years.

NFSP and CWU have expressed confidence in the system.

The system is currently being updated to 'Horizon Online'. This is to achieve benefits in running costs and change management. It is not being done because there are any doubts about the robustness of the original Horizon system.

The integrity of both Horizon and Horizon online is built on tamper proof logs, real time back ups, and absence of 'backdoors' so that all data entry or acceptance is at branch level and is tagged against the log-on ID of the user. This means that ownership of the accounting is at branch level and it is impossible to make changes to branch accounts remotely.

Critically, Horizon creates a separate audit file of every transaction done with every record written to the log having a unique incrementing sequence number. This is retained remotely for seven years and cannot be altered in any way. Therefore, in any legal case relating to the system or allegations that data was missing, this audit log can be produced to identify exactly what was recorded onto the system in the branch concerned at the time concerned.

Subpostmasters are trained on the system, there is material to support in branch and helplines are available. If an error occurs through a user mistake - there is a full system in place for investigation and error resolution. If there is a local disconnection of the system at a branch for any reason, IT controls detect the outages and raise recover alerts to the branch to check and update the accounts.

As with any large organisation, Post Office Ltd has and continues to implement a range of mechanisms whereby accounting processes and outputs are regularly reviewed to ensure ongoing accuracy.

Action taken with subpostmasters for accounting irregularities

Post Office Ltd has a regular system of auditing subpostmasters' accounts. If irregularities are discovered, then a formal and thorough investigation is triggered and, if necessary, action can be taken in accordance with the subpostmaster's contract. Subpostmasters have the right of representation throughout internal disciplinary procedures - and if the case leads to summary termination of contract, there is the right of appeal to an appeals manager who considers the case. Again there is a right to representation through this process - this role is often undertaken by the NFSP.

In certain cases, following consultation with legal advisers, a decision may be made by POL to pursue a criminal case. Since 2005 there have been 230 criminal cases that have proceeded to Court. Of these 169 have been found guilty and 18 defendants cautioned. Of the remaining 43, 1 was found not guilty but this was nothing to do with any Horizon challenge. 42 cases were not carried forward for a variety of reasons (but there is no suggestion that any of these reasons were related to concerns about Horizon).

As there is a legal contract between the subpostmaster and Post Office Ltd, if a subpostmaster believes that his/her contract has been terminated inappropriately; he/she can also refer the process into the legal system.

No court has ever ruled that there have been problems with the Horizon system." (UKGI00000062 Briefing/Update for Edward Davey ahead of meeting with Alan Bates (JFSA))

108. This is the only substantive written briefing I received on Horizon. It indicated that Horizon had "proved robust", that there were no "systematic integrity issues", that the unions had "expressed confidence in Horizon", that there was training, there were proper audit processes and no "backdoors", there had been regular reviews, there was an appeals process and legal representation, and no court had ever found problems with Horizon.
109. I would have taken from this that officials were confident in Horizon and that the Post Office had had it independently assured. That for the vast bulk of the network it seemed to be working. And that those who had been prosecuted had had legal representation, and the legal process would have had a much greater chance to get to the bottom of any issues than I could conceivably do as a minister.
110. On 7th October 2010, I met with Sir Alan Bates. I think it is very likely that a note was taken, but despite my requests I have been informed that DBT do not hold or cannot locate a copy of any such note. I do recall that Sir Alan set out his concerns relating to the Horizon system and the treatment of subpostmasters, and I listened. I do not remember in any detail what was said at the meeting, but I am likely to have followed the lines to take set out in the briefing note (UKGI00000062, Briefing/Update for Edward Davey ahead of meeting with Alan Bates (JFSA)), not least because of the warnings about this being *sub judice*. I note that Issy Hogg, who was present at the meeting as a solicitor for some of the subpostmasters, told the BBC in 2011 about me that "*he gave us a very sympathetic ear, listened to us for quite some time*". (WITN10610116 BBC Surrey Post Office Investigation News Article, produced by Nick Wallis)

111. After the meeting I told my officials to get answers to the points Sir Alan had raised. I can see from one of the documents provided to me by the Inquiry (POL00107182) that these included:

- *Whether the contract has changed since 1994 to reflect Horizon*
- *Lack of audit trail for subpostmasters*
- *POL can access the system remotely and make changes to it*
- *Frequency of software updates*
- *Equipment moved from one branch to another*
- *No regular audit systems*
- *Subpostmasters having to agree to a loss or can't open the office the next day*
- *Processes for suspension and afterwards*

112. I am informed that on 4th November 2010, Mike Whitehead of ShEx met with POL to follow up on the issues discussed in my meeting with Sir Alan, as I had instructed.

113. The Inquiry has shown me an email exchange, with the subject title "JFSA", between Mike Whitehead of ShEx and Mike Granville of POL, which took place on 26th November 2010 (POL00120478 Email thread from Mike Granville to Mike Whitehead RE: JFSA - audit files and clearance processes). Mr Whitehead requested urgent answers in relation to the points raised by Sir Alan. I note that Mike Whitehead stated in his email that "*Ed Davey is coming under extreme pressure to respond on these cases. Can you get something across to me today.*" Mr Granville apparently provided a note relating to some of the cases (which I have not seen) and indicated that he would provide "*some more generic material*". Mr Whitehead asked "*can we quote POL as categorically stating that there is no remote access to the system or to individual branch Horizon terminals*

which would allow accounting records to be manipulated as JFSA claims?" In response, Mr Granville stated "The system is based on a user log in, and all actions have to be endorsed by the user. POL cannot remotely control a branches system. Any technical changes by Fujitsu that impact the system have to go through clearance processes which would prevent any amendment to existing data. The independent audit file is in place and can show all the system activity, down to a single keystroke, in a particular branch." (POL00120478 Email thread from Mike Granville to Mike Whitehead RE: JFSA - audit files and clearance processes). For the avoidance of doubt, I did not see these emails at the time.

114. It appears that, shortly thereafter, POL forwarded a paper entitled "JFSA response issues" to officials in ShEx (presumably Mike Whitehead) (POL00089001 Note re: JFSA response issues - paper for BIS). I did not see this paper at the time, but I note now that it recorded the discussion between Mike Whitehead and the Post Office, following my meeting with Sir Alan, as follows:

"Follow up points from POL meeting with Mike Whitehead on 4 November (subsequent to the JFSA meeting with Edward Davey).

Points discussed at the meeting

- *Whether the contract has changed since 1994 to reflect Horizon - The Contract has had a series of amendments and associated operational instructions which mean that it remains a proper legal and commercial document with respect to the operation of a Post Office. There has been no legal challenge to the appropriate nature of POL's agency contracts*
- *Lack of audit trail for subpostmasters - subpostmasters can pull off a transaction log every day and declare their cash at the end of the day. The facilities are there for subpostmasters to track their own transactions should they wish*

- *POL can access the system remotely and make changes to it-. The system is based on a user log in, and all actions have to be endorsed by the user. POL cannot remotely control a branches system. Any technical changes by Fujitsu that impact the system have to go through clearance processes which would prevent any amendment to existing data. The independent audit file is in place and can show all the system activity in a particular branch.*

- *Frequency of software updates - these are normal operational updates such as those that occur in any system. They do not indicate in any way any faults or unreliability in the system*

- *Equipment moved from one branch to another. If any equipment is moved from one branch to another there is no potential for past transactions in any way to impact the system. Transactions are not held on or tagged to the equipment in the branch - they are recorded against the branch code. As previously advised - every transaction undertaken on the system is independently recorded and maintained in a separate tamper proof audit log. There is always therefore the capability to track back transactions related to the branch independent of the equipment on which it was undertaken.*

- *No regular audit systems- our audit systems are based on random choice and on risk factors. Audits from the central team are not needed for the subpostmaster to operate the system or to know where they are with their own account. Subpostmasters can obtain a full transaction log, make daily cash declarations and can regularly balance their account. They have access to phone help and personal visit in any cases of difficulty.*

- *Subpostmasters having to agree to a loss or can't open the office the next day - this is not the case. If there is a discrepancy in an account when it is*

balanced, the subpostmaster has the option for 'settle centrally.' – this means that they can roll the system over whilst the issue is being looked into. It is a standard process which does not imply acceptance or otherwise of the discrepancy by the subpostmaster. It is a standard part of the process.

- *Processes for suspension and afterwards - The Post Office processes cover the situation whereby the subpostmaster is made clear of the situation, has the opportunity for interview, can be accompanied at that interview – and there are clear rights of appeal once the decision is made (the attached document summarises the situation). In cases where the Post Office Investigation Branch is involved, the procedures followed within their investigation and interviews are fully compliant with the relevant UK legislation. The attached note explains further the credentials of Post Office Investigators (who would always be involved in a case that involved prosecution)."*

115. Among other things, the paper states:

"Next Steps within POL

The Horizon system and accompanying contractual processes remain fully robust. Their integrity and sound basis have been demonstrated over many years, and they have underpinned the provision of effective and sustainable service to Post Office customers. POL refutes the unsubstantiated allegations made by the JFSA.

POL maintains a legal contractual relationship with subpostmasters which is based on values of trust and mutual respect. In cases where there are reasons why this relationship cannot continue, there are full processes of internal appeals and the parties can have full subsequent recourse to the UK legal system. As a matter of course, and on an ongoing basis, POL works with the

National Federation of Subpostmasters (a recognised representative body for subpostmasters) on the development of contractual and associated process matters.

Looking forward, as part of its future strategy consistent with the Policy Statement outlined by Government in November 2010, Post Office Ltd will be seeking to further review its contracts and accompanying processes to meet the changing needs of its customers. This approach will continue to ensure that the contractual basis and associated procedures between Post Office Ltd and individual subpostmasters remains sound, fair, commercial and equitable.

It is this combination of;

- the current robustness and integrity of Horizon.*
- clear internal processes with appeal systems with the ultimate backstop of the UK legal system (should cases be referred to it),*
- ongoing liaison with the NFSP as the recognised group representing subpostmasters and*
- a forward looking approach to the further development of contracts and associated policies in line with developing strategy and Government policy*

that provides assurance to BIS that the approach taken by Post Office Ltd continues to be fair and equitable."

116. The assurances that the Horizon system was "fully robust", that its "integrity and sound basis have been demonstrated over many years" and that the JFSA's allegations were "unsubstantiated" have now been shown to be both untrue and inconsistent with what POL actually knew at the time. Nevertheless, this was the spin that POL employees chose to put on the information it provided to the

Government following my direction that Sir Alan Bates' questions were answered.

117. As I have said above, I was not shown this paper at the time. However, I was provided with a draft letter to Sir Alan, which I signed and sent dated 7th December 2010. This letter states:

"Following our meeting, the points you raised as Chairman of the Justice for Subpostmasters Alliance (JFSA) are being followed up on my behalf by officials as part of our dialogue with the company. However, as I made clear at the meeting, neither I nor the Department can intervene in cases which are sub judice or where court action had been determined, as in Mrs Misra's and Mrs Buffrey's cases.

I recognise that the core of the JFSA's concerns relates to the Horizon system to which you attribute the financial discrepancies and shortages which have led to a number of subpostmasters having their contracts terminated and subsequent court action. However POL continues to express full confidence in the integrity and robustness of the Horizon system and also categorically states that there is no remote access to the system or to individual branch terminals which would allow accounting records to be manipulated in any way. In addition, I understand that all system activity, down to the individual key stroke, is also recorded into a separate vaulted transaction file with every record encrypted and written to the log and with each record having a unique incrementing sequence number. This log is retained on a separate server independent of Horizon for at least seven years, cannot be altered in any way and all access to it is securely controlled. This approach is consistent with that of banking systems and provides a fully secure audit file which can show all system activity in a particular branch.

In your letter of 14 October, you suggest that the wider introduction of the Post Office local (Essentials) model will wipe out that part of the investment of the subpostmaster relating to the original post office element of the business. I can assure you that, although the precise details have still to be finalised, there will be appropriate financial arrangements in place to reflect either the relocation of post office services or the transition from the current contract model to the new one at the same site. I would also emphasise that there will be no programme of post office closures.” (POL00186759, Letter from Edward Davey to Alan Bates RE: Response to Letters Dated 14 and 21 October 2010).

118. The draft of this letter was essentially the response from officials to me as a minister, following my direction that I wanted these questions answered, in the form of a reply to Sir Alan himself.

119. I cannot recall a detailed discussion with officials about this letter or the detailed findings set out in POL's response to Mike Whitehead's questions, but I strongly expect there was one, although DBT has not been able to provide any minutes or submissions to that effect.

Members of Parliament

120. As a minister, when Members of Parliament raise matters with you, you inevitably take them more seriously, and there was a small trickle of correspondence and parliamentary questions from MPs on this issue. None of these seemed to raise any issues that fundamentally questioned the advice that I had received from officials and the Post Office.

121. Perhaps of even greater note, and having checked the record, I was not asked a single question on Horizon on the floor of the House or in 20 sittings of the Postal

Services Bill committee. Nor do I recall receiving any media enquiry about it at all during my 20 months in post.

122. There were many other questions on the Post Office from MPs, primarily around the viability of the network and the broader policy changes we were making, but Horizon was never raised in oral questions or debate at any stage.
123. However, to assist the Inquiry, which has provided examples of the small amount of correspondence and parliamentary questions I received on this, let me try to explain how these were dealt with.
124. On correspondence, a draft response to Mary Glindon MP dated "October 2010", prepared by officials, is typical (UKGI00014068, Letter from Edward Davey MP to Mary Glindon MP re: Mr Peter Holmes' problems with Post Office Ltd). I am confident I would have sent a reply in these terms or similar. It stated:

"Under the postal sector reforms introduced in 2001 by the previous Government, Royal Mail (which includes Post Office Ltd (POL)) was given greater commercial freedom, as the management and unions had requested, and Government has assumed an arm's length role as a shareholder in a public limited company ...

The issues raised by Mr Holmes are operational and contractual matters for POL and the Government does not have any role in the day to day operations of the post office network. I understand that POL continue to express full confidence in the integrity and robustness of the Horizon system which has been operating for 10 years and typically processes 230 million transactions a month from over 30,000 counter positions in nearly 12,000 post office branches.

The integrity of Horizon is built on tamper proof logs, real time back ups, and absence of 'backdoors' so that all data entry or acceptance is at branch level and is tagged against the log-on ID of the user. I also understand that Horizon creates a separate audit file of every transaction done with every record written to the log having a unique incrementing sequence number. This is retained remotely for seven years and cannot be altered in any way. Therefore, in any legal case relating to the system or allegations that data was missing, this audit log can be produced to identify exactly what was recorded onto the system in the branch concerned at the time concerned. Help lines are available. If an error occurs through a user mistake – there is a full system in place for investigation and error resolution. If there is a local disconnection of the system at a branch for any reason, IT controls detect the outages and raise recover alerts to the branch to check and update the accounts.

In cases of suspension and termination of contract, subpostmasters are contractually entitled to be accompanied at appeal hearings by a National Federation of SubPostmasters' representative or friend. Appeals are heard by a senior POL manager not previously involved in the case and legal avenues are also available if the subpostmaster continues to feel his contract has been wrongly terminated.

I have however recently met with representatives of the Justice for Subpostmasters Alliance to listen to their concerns and my officials are following up with Post Office Ltd some of the points made."

125. As POL provided additional information to officials, the content of draft responses changed. A typical later example is a draft response to Karen Lumley MP dated "February 2011" (UKGI00013913 Draft Letter from Edward Davey MP to Karen Lumley MP re: concerns raised by constituents about Post Office Horizon system).

126. I would not have signed any letter which I did not believe was true.

127. During my time as a BIS minister, three MPs tabled written Parliamentary Questions in relation to Horizon. [UKGI00000062; POL00417098; WITN10610110; WITN10610111; WITN10610112; WITN10610113] Written Parliamentary Questions are a very regular occurrence – a search of Parliament's online database suggests that I received 2,144 during my time as a BIS minister. In the same way as routine correspondence, officials would prepare a response which would be placed in the red box. Unless officials flagged some issue which I needed to grapple with, I would read and sign these at speed based on the advice given by officials.

128. Wherever MPs were dissatisfied by the response to a Parliamentary question, they could attempt to raise the issue in debate in the House. Having checked the parliamentary record, Horizon was never raised on the floor of the House during my time as a BIS minister.

129. When MPs wish to raise issues with ministers, often they do so informally in the division lobbies. Horizon, and the treatment of subpostmasters, was not an issue that I recall ever being raised with me in this way. However, the Inquiry has provided me with a letter from Lord Arbuthnot of Edrom – then an MP – dated 15th December 2011, which mentions that he and I discussed it at some point before then. I do not now recall anything about it, though I expect it was an informal conversation.

130. So the basic point is this. The alarm bells had been rung by Sir Alan Bates. Following our meeting I asked for information in relation to each of the points he raised, and received clear assurances – based on independent testing of their system, because the courts had examined the issue, and because the NFSP seemed to believe there was no issue. Not only had the submission from Mike Whitehead in dated 5th October said that the NFSP had no concerns, I specifically raised this at a meeting with the General Secretary George Thomson,

as part of a much broader agenda. He quickly dismissed the concerns of the JFSA. Given that he and his NFSP colleagues had always given me the impression that they were no friend of POL, and that they were democratically elected by sub postmasters, that only seemed to confirm both the advice I had received and the findings of many courts. I didn't see sufficient evidence to warrant setting up an investigation.

131. I would finally like to underline the point that ministers are reliant on people telling them the truth. If you are lied to directly by your officials, or indirectly by an arm's-length body like the Post Office, it seems to me inherently difficult for any minister with a complex and busy portfolio to have sufficient information to question the replies they have received in good faith. Nonetheless, I wish I had somehow managed to see through the misinformation I was given, and I am sorry I didn't.

SECTION 3: REFLECTIONS

132. After I left BIS in February 2012, I don't remember hearing anything about the Horizon system until the High Court judgment in Bates v Post Office in December 2019. Like so many others, I was shocked by the enormous scale of this miscarriage of justice.

133. It was clear to me that, following that historic judgment, there needed to be a full, statutory public inquiry to get to the bottom of this scandal and hold those responsible to account, and that the victims must have their names cleared and receive full and fair compensation.

134. Over the next six months, during which time I was Acting Leader of the Liberal Democrats, my party issued calls in Parliament for all of these to happen. In June 2020, I signed an Early Day Motion in Parliament urging the Government to establish a judge-led public inquiry at the earliest opportunity. (WITN10610114

UK Parliament Motion for Judge-led public inquiry into the Horizon Scandal - signed by 151 Members)

135. I was very pleased when the Inquiry was eventually established, and delighted when Parliament finally passed the legislation to quash the wrongful convictions of subpostmasters in May 2024. However, I believe the Government must go further and faster to pay full and fair compensation to all victims as quickly as possible.
136. I am currently working with three separate constituents who are victims of the Horizon scandal and came to me as their MP for help in overturning their convictions and securing compensation. Hearing from them and assisting with their cases has helped me see even more clearly the appalling way POL has treated subpostmasters, the trauma many have suffered as a result, and the inadequacies of the current compensation schemes when it comes to ensuring victims get the redress they deserve.
137. Since the 2019 judgment, and thanks in large part to the evidence elicited by the Inquiry, I have had the chance to learn more about how this terrible miscarriage of justice was able to occur, as well as what happened since my time in BIS to expose it. I have spent a lot of time thinking about the changes that are needed to prevent a similar scandal from happening in the future.

Duty of candour

138. Without wishing to pre-empt the findings of this Inquiry, I think a big challenge this scandal highlights is what can be done when senior executives in an organisation like the Post Office are prepared to lie – not only to victims, journalists and ministers, but even to Parliament and the courts.

139. Our system of government is essentially built on the assumption that people in positions of trust – such as the leadership of the Post Office – tell the truth. It is hard to imagine how it could function without that basic assumption. For example, ministers are given a huge amount of advice and information from officials every day. They simply do not have the time or means to interrogate all of it to check for themselves whether it is true or false.
140. I believe that most people in public life are decent and honest. Yet, from the Hillsborough disaster to the infected blood scandal to the Horizon scandal and many others, we have seen all too often a tendency to cover up mistakes, to close ranks to protect institutions, and indeed to lie.
141. I therefore strongly support the calls from Hillsborough Now, Covid-19 Bereaved Families for Justice, Inquest and many others for a statutory “duty of candour” on all public authorities, public servants and officials to act in the public interest and with transparency, candour and frankness – in other words, always to tell the truth.

Oversight of arm’s-length bodies

142. At the same time, it is important to consider ways to strengthen oversight of arm’s-length bodies such as the Post Office. I believe that splitting POL out from the Royal Mail Group in 2012 and putting an official from the ShEx (now UKGI) on its board for the first time were steps in the right direction, but they clearly failed to ensure proper transparency and oversight.
143. Perhaps it might be necessary to require Departmental Permanent Secretaries and/or ministers themselves to sit on the boards of such organisations – though in the case of ministers, the sheer number of arm’s-length organisations may not always make this a practical solution, especially when combined with the extent of ministerial churn. An alternative would be to give Parliamentary Select

Committees a greater role, with Parliament more generally having greater powers and resources to scrutinise all arm's-length bodies.

Ministers and the courts

144. Looking back at the advice I received for my meeting with Sir Alan Bates in October 2010, I remember that it seemed to me at the time that one of the most important points officials were making was that this issue had been adjudicated by the courts. Judges, lawyers and juries had, I was told, dealt with these issues, and it was not for a minister to overrule them.
145. As a firm believer in the rule of law and the independence of the judiciary, I found that a very powerful argument. Yet clearly this scandal has demonstrated that courts can get it very wrong, multiple times.
146. This raises serious questions for the judiciary and the legal profession. How was it possible for so many lawyers, in so many cases, to get things so badly wrong? We all rely on the court process to examine all the facts of a case in minute detail, to expose lies and get to the truth – and to bring in experts when issues are complex such as how an IT system is functioning. I hope the Inquiry can get to the bottom of why the normal legal process failed over Horizon and make recommendations on reform, though I am not legally qualified to speculate on what they might be.
147. From my perspective, the inter-relationship between ministers and the judiciary may need some consideration, with the central question being: what could a minister do if they feel that the courts might be getting something wrong, without interfering with judicial independence?

148. This might at least empower ministers to feel they could raise a questioning eyebrow if a similar set of miscarriages of justice were to arise. I am afraid I do not have an easy answer, recognising that no one wants to create a ministerial power that could be abused to undermine our courts.
149. Perhaps some new process could be created for ministers to raise any such concerns with a senior judge, or some existing process within the Ministry of Justice could be augmented – though it would obviously be far preferable if the judiciary and legal profession could review their own practices in the light of the Inquiry's findings.
150. It has also been shocking to read about the failures of POL and its lawyers to disclose crucial information about the bugs in the Horizon system to defendants and to the courts. Our legal system relies on lawyers living up to their disclosure obligations, and though I am not a lawyer it seems clear that there must be strong sanctions for those who fail to do so – including imprisonment in the most serious cases.

Prosecutorial powers

151. POL's more than 700 wrongful prosecutions of subpostmasters also calls into question the role of POL and indeed all publicly owned bodies in undertaking criminal prosecutions themselves.
152. There may of course be certain public bodies, such as the Serious Fraud Office, for whom this makes sense. But in general, it seems to me that prosecutions in the public interest are best left to the Crown Prosecution Service, which is subject to independent inspections by HM Crown Prosecution Service Inspectorate.

Whistleblower protections

153. I also reflect on the importance of the Fujitsu whistleblower, Richard Roll, in exposing the lies about Horizon – first on BBC’s Panorama documentary “Trouble at the Post Office” in August 2015, and later in the High Court. I note that Mr Justice Fraser described Mr Roll’s evidence as “very important” to the case.

154. If we are to prevent future scandals like this, we must make it easier for whistleblowers like Mr Roll to come forward earlier to expose institutional lies and wrongdoing. For that reason, I strongly support the proposals put forward by Whistleblowers UK and by my Liberal Democrat colleague Baroness Kramer in a Private Members’ Bill for a new “Office of the Whistleblower” with new legal protections for whistleblowers.

Future of the Post Office

155. Finally, there is clearly a lot of work to do to rebuild trust and confidence in the Post Office – among both subpostmasters and the public as a whole – after it has been so badly shattered by this scandal.

156. I believe that the radical idea of mutualisation, which came from the subpostmasters themselves when I was in BIS, and which we legislated for in the Postal Services Act 2011, might offer a productive way forward.

157. The work I commissioned on mutualisation and the consultations that were undertaken over a decade ago all seemed quite promising at the time: giving subpostmasters, employees and customers greater ownership and control in how the Post Office was run seemed attractive when I was championing it back then and I have always been disappointed that it was not taken forward. In the

light of this shocking miscarriage of justice, it seems this approach might offer a real way of both empowering subpostmasters and gradually restoring the reputation of the Post Office.

158. I very much look forward to reading the Inquiry's recommendations on these and other issues, and I hope they can help to bring about the changes needed to stop miscarriages of justice like this from ever happening again.

Statement of Truth

I believe the content of this statement to be true.

Signed: GRO _____

Dated: 5/7/24

ANNEX 1: Coalition Programme for Government extracts

To give a sense of the breadth and quantity of my work at BIS, these are the priorities set out in the Coalition's Programme for Government that fell in my areas of ministerial responsibility.

We will seek to ensure an injection of private capital into Royal Mail, including opportunities for employee ownership. We will retain Post Office Ltd in public ownership.

We will review employment and workplace laws, for employers and employees, to ensure they maximise flexibility for both parties while protecting fairness and providing the competitive environment required for enterprise to thrive.

We will make it easier for people to set up new enterprises by cutting the time it takes to start a new business. Our ambition is to make the UK one of the fastest countries in the world to start up a new business. We will reduce the number of forms needed to register a new business, and move towards a 'one-click' registration model.

We will consider the implementation of the Dyson Review to make the UK the leading hi-tech exporter in Europe, and refocus the research and development tax credit on hi-tech companies, small firms and start-ups.

We will review the range of factors that can be considered by regulators when takeovers are proposed.

We will reinstate an Operating and Financial Review to ensure that directors' social and environmental duties have to be covered in company reporting, and investigate further ways of improving corporate accountability and transparency.

We will ensure that Post Offices are allowed to offer a wide range of services in order to sustain the network, and we will look at the case for developing new sources of revenue, such as the creation of a Post Office Bank.

We will give regulators new powers to define and ban excessive interest rates on credit and store cards; and we will introduce a seven-day cooling-off period for store cards.

We will oblige credit card companies to provide better information to their customers in a uniform electronic format that will allow consumers to find out whether they are receiving the best deal.

We will introduce stronger consumer protections, including measures to end unfair bank and financial transaction charges.

We will take forward measures to enhance customer service in the private and public sectors.

We will introduce, as a first step, an Ombudsman in the Office of Fair Trading who can proactively enforce the Grocery Supply Code of Practice and curb abuses of power, which undermine our farmers and act against the long-term interest of consumers.

We will give Post Office Card account holders the chance to benefit from direct debit discounts and ensure that social tariffs offer access to the best prices available.

We will encourage shared parenting from the earliest stages of pregnancy – including the promotion of a system of flexible parental leave.

We will support pro-development trade deals, including the proposed Pan-African Free Trade Area.

We will ensure that UK Trade and Investment and the Export Credits Guarantee Department become champions for British companies that develop and export innovative green technologies around the world, instead of supporting investment in dirty fossil-fuel energy production.

We will phase out the default retirement age and hold a review to set the date at which the state pension age starts to rise to 66, although it will not be sooner than 2016 for men and 2020 for women. We will end the rules requiring compulsory annuitisation at 75.

We will support the creation and expansion of mutuals, co-operatives, charities and social enterprises, and enable these groups to have much greater involvement in the running of public services.

We will give public sector workers a new right to form employee-owned co-operatives and bid to take over the services they deliver. This will empower millions of public sector workers to become their own boss and help them to deliver better services.

ANNEX 2: Examples of work in other policy responsibilities at BIS, in addition to postal affairs

A. Employment Affairs, inter alia:

1. The abolition of the default retirement age
2. The development of proposals for shared parental leave, with initial consultation
3. The introduction of a new right to request flexible working for all employees
4. Consultation on further plans to promote equal pay
5. Regular meetings of the European Ministerial Council for Employment and Social Affairs
6. Meetings with ACAS
7. Reform of Employment Tribunals and work on “employment dispute resolution” outside tribunals
8. The Employment Law Review
9. Work to extend employee share ownership

B. Company Law and Corporate Governance, inter alia:

1. Corporate reporting reform – including with the Financial Reporting Council
2. Work to promote Women on Boards, not least the Davies Review
3. Work on a new EU law to require transparency for British and EU firms involved in the extractive industries, where they operated in developing countries
4. Deregulation of audit for micro-enterprises, at the EU
5. Work on policy areas linked to The Insolvency Service, especially around “pre-packs”

C. Competition Policy, inter alia:

1. Merger of the OFT and the Competition Commission, into the Competition and Markets Authority
2. Reform of Competition Law, resulting in the Enterprise and Regulatory Reform Act 2013

D. Consumer Policy, inter alia:

1. Citizens Advice
2. Consumer Focus
3. Consumer law – existing and reform
4. Credit regulation – high-cost credit, payday lending, debt advisory services
5. Credit unions

E. Trade Policy

1. Leading the White Paper on Trade and Investment
2. Attending meetings of the EU Ministerial Council on Competitiveness – which oversaw work around the Single Market
3. Attending meetings of the EU Ministerial Council on Trade, with significant work around the EU-Korea FTA
4. Setting up and leading within the EU Ministers for both these councils the “Likeminded Group for Growth”, to push a pro-growth agenda at the EU level
5. Work around the WTO, including attending the Ministerial round in Geneva for Doha
6. Export Credit Guarantee Department

ANNEX 3: House of Commons debates as BIS minister

To give a sense of the breadth and quantity of my parliamentary work as a BIS minister, this is a list compiled from Hansard of the legislation, debates and oral questions on which I led or responded for the Government in the House of Commons.

A. Legislation

1. City of Westminster Bill
2. Canterbury City Council Bill
3. Lawful Industrial Action (Minor Errors) Bill
4. Postal Services Bill
5. Daylight Saving Bill
6. Gangmasters Licensing (Extension to Construction Industry) Bill

B. Debates

1. Higher education funding
2. Postal services in Scotland
3. Marine training and employment
4. Post Office network
5. Employment law
6. Unscrupulous lenders
7. Consumer credit and debt management
8. Unscrupulous builders
9. Citizens Advice bureaux
10. Economic development in the North East

11. False self-employment status
12. Promotion of women in business
13. Special Representative for International Trade and Investment
14. Country of origin marking
15. Workplace drug testing
16. Dental bleaching
17. International Labour Organisation convention on domestic workers
18. Co-operatives and mutuality
19. Debt management plans
20. Opportunities for the next generation
21. Effect of late payments on small and medium-sized enterprises
22. Consumer Focus Wales
23. Loft conversions
24. Debt advice and debt management services
25. Reform of the pub industry

C. Oral questions

1. Flexible working
2. Use of Royal Mail by public bodies
3. Pubs and the beer tie
4. Financial viability of the Post Office network
5. EU free trade agreement with Peru and Columbia
6. Health and safety regulations
7. Citizens Advice

8. Companies Investigation Branch
9. Groceries Supply Code of Practice
10. Royal Mail sorting offices
11. Business regulation
12. Operating and Financial Review
13. Future of the Post Office network
14. Bank lending to social enterprises
15. Flexible working and shared parental leave
16. Employment law
17. Post Office collection charges for small businesses
18. Daylight saving time
19. Private investment in Royal Mail
20. Royal Mail deliveries
21. Pre-packaged administrations
22. Fossil fuel subsidies
23. Post boxes
24. Small business recruitment
25. Groceries Code Adjudicator
26. Big Society
27. Unfair dismissal
28. Farepak Christmas savings club
29. Office of Fair Trading
30. Payday lending
31. Transparency in company profits reporting

32. Corporate social responsibility
33. Debt advice agencies
34. Phoenix companies
35. Tata plant in Scunthorpe
36. High-cost credit
37. EU directives
38. Outward investment to Azerbaijan
39. Representation of women on company boards
40. Payment card surcharges
41. Public data corporation
42. Liquidation of Bank of Credit and Commerce International
43. Employment law in Northern Ireland
44. Transfer of Undertakings (Protection of Employment) regulations
45. Royal Mail postcode database
46. Public interest declarations

ANNEX 4: Overseas travel as BIS minister

DBT was unable to provide me with my ministerial diary, but I have been able to put together this list of my overseas travel from the transparency data published online by BIS.

30 June 2010

European Business Summit, meeting with Trade Commissioner and Employment Commissioner

Brussels, Belgium

14 July 2010

Informal Competitiveness Council meeting and informal meeting with CEO of Belgium Post

Brussels, Belgium

10 September 2010

Trade Foreign Affairs Council. Meeting with Minister of State for Foreign Trade in France

Brussels, Belgium

5-6 October 2010

Meetings with Ministers and officials

Berlin, Germany

7-8 January 2011

Visit to discuss priorities ahead of Polish EU Presidency

Warsaw, Poland

13-18 January 2011

Informal EPSCO Council meeting and bilateral meetings

Budapest, Hungary

2 March 2011

Accompanying the DPM at trade talks

Brussels, Belgium

12-13 May 2011

Foreign Affairs Council (Trade) and bilateral meeting with Commissioner for Trade and
Polish Minister for Economic Affairs

Brussels, Belgium

30 May 2011

EU Competitiveness Council

Brussels, Belgium

4 July 2011

To develop relations with Germany and help to drive forward the EU growth agenda

Berlin, Germany

7-8 July 2011

Employment, Social Policy, Health and Consumer Affairs EPSCO Council

Sopot, Poland

13 July 2011

Joint visit with the Secretary of State for Health to discuss employment issues

Brussels, Belgium

25-26 September 2011

Trade Foreign Affairs Council

Brussels, Belgium

28-29 September 2011

Competitiveness Council

Brussels, Belgium

20-21 October 2011

European Ministers' meeting on employment relations

Krakow, Poland

13-15 November 2011

European Ministers' meeting on EU Growth

Stockholm, Sweden

17 November 2011

Meeting with a UK delegation, the European Commission and Members of the European Parliament to discuss better regulation

Brussels, Belgium

28 November 2011

Meetings with UK and German ministers on EU growth and employment relations

Berlin, Germany

14-15 December 2011

European Trade Foreign Affairs Council meeting

Geneva, Switzerland

It is not included in the list published by BIS, but I also represented the UK at the World Trade Organisation's eighth ministerial conference in Geneva, 15-17 December 2011.

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No.	URN	Document Description	<u>Control Number</u>
1.	WITN10610101	Liberal Democrats Party - Manifesto 2010 - fair taxes, fair chance, fair future and fair deal document	WITN10610101
2.	WITN10610102	List of Ministerial Responsibilities - Including Executive Agencies and Non-Ministerial Departments, prepared by the Cabinet Office - July 2010 edition	WITN10610102
3.	WITN10610103	Coalition Agreement for stability and reform between the Conservative and Liberal Democrat Parliamentary Parties	WITN10610103
4.	WITN10610104	The Coalition: our programme for government by David Cameron and Nick Clegg	WITN10610104
5.	WITN10610105	The Co-Operative UK Mutual Options for Post Office Ltd	WITN10610105
6.	WITN10610106	BIS Building a mutual Post Office - The Government's Response	WITN10610106
7.	WITN10610107	News Article on Constructive talks held over transfer of Post Office Ownership to Operators, by Mark Sweney	WITN10610107
8.	UKGI00016119	Letter from Alan Bates on behalf of Justice For Subpostmasters Alliance	UKGI026912-001
9.	ABAT00000001	Letter from Edward Davey MP to Alan Bates re answer to his request from a meeting.	ABAT00000001
10.	UKGI00016099	Letter from Alan Bates to Edward Davey MP, re Justice for Subpostmasters Alliance	UKGI026892-001
11.	UKGI00000062	Briefing/Update for Edward Davey ahead of meeting with Alan Bates (JFSA)	VIS00001023
12.	POL00417098	Email Tracy Abberstein on behalf of David Y Smith to Mike Granville, Martin Humphreys, Lesley J Sewell cc Mike Young re FE Justice for SPMS	POL-BSFF-0237249
13.	POL00107182	Justice for Subpostmasters Alliance Response Issues - suspension and termination numbers, case updates and follow-up from 04/11/2010 meeting.	POL-0105490
14.	POL00120478	Email thread from Mike Granville to Mike Whitehead RE: JFSA - audit files and clearance processes	POL-0126170
15.	POL00089001	Note re: JFSA response issues - paper for BIS	POL-0080962
16.	POL00186759	Letter from Edward Davey to Alan Bates RE: Response to Letters Dated 14 and 21 October 2010.	POL-BSFF-0024822

17.	UKGI00014068	Letter from Edward Davey MP to Mary Glendon MP re: Mr Peter Holmes' problems with Post Office Ltd	UKGI024861-001
18.	UKGI00013913	Draft Letter from Edward Davey MP to Karen Lumley MP re: concerns raised by constituents about Post Office Horizon system	UKGI024706-001
19.	WITN10610110	Parliamentary Question raised by Priti Patel (Witham) to Edward Davey, Department for Business, Innovation & Skills Re: representations received by JSFA	WITN10610110
20.	WITN10610111	Parliamentary Question raised by Priti Patel (Witham) to Edward Davey, Department for Business, Innovation & Skills Re: cost estimate to SPMs of errors in Horizon and if he will make a statement	WITN10610111
21.	WITN10610112	Parliamentary Question raised by Nicholas Brown (Newcastle Upon Tyne East) to Edward Davey, Department for Business, Innovation & Skills Re: recent assessments of Horizon's performance and whether errors were reported	WITN10610112
22.	WITN10610113	Parliamentary Question raised by Michael Weir (Angus) to Edward Davey, Department for Business, Innovation & Skills Re: figures of prosecutions and investigations of SPMs by Post Office, complaints, operational faults reported and Horizon's cost	WITN10610113
23.	WITN10610114	UK Parliament Motion for Judge-led public inquiry into the Horizon Scandal - signed by 151 Members	WITN10610114
24.	WITN10610116	BBC Surrey Post Office Investigation News Article, produced by Nick Wallis	WITN10610116