

Friday, 19 July 2024

1
2 (9.45 am)
3 MR BLAKE: Good morning, sir. Can you see and hear me?
4 SIR WYN WILLIAMS: Yes, I can, thank you.
5 MR BLAKE: Thank you very much. This morning we're going to
6 hear from Ms Swinson.
7 SIR WYN WILLIAMS: Yes.
8 JOANNE KATE SWINSON (affirmed)
9 Questioned by MR BLAKE
10 MR BLAKE: Thank you very much. Can you state your full
11 name, please?
12 A. My name is Joanne Kate Swinson.
13 Q. Thank you very much. Ms Swinson, you should have in
14 front of you a witness statement?
15 A. I do.
16 Q. Is that dated 19 June 2024?
17 A. It is.
18 Q. Could I ask you, please, to turn to the final page.
19 A. Yes, I've done that.
20 Q. Can you confirm that is your signature?
21 A. Yes, that is my signature.
22 Q. Can you confirm that that statement is true to the best
23 of your knowledge and belief?
24 A. Yes, the statement is true.
25 Q. Thank you very much. That witness statement has

1

1 A. Yes, I was.
2 Q. Your post in both respects was covered by Jenny Willott
3 MP or just in respect of one of those posts?
4 A. In both of the ministerial posts, obviously not my
5 constituency work.
6 Q. Those are two very long ministerial titles. Did you
7 divide your time equally between the two?
8 A. The role at BIS -- Business, Innovation and Skills --
9 was a role that took more of my time than the Women and
10 Equalities role. There were more different elements to
11 the brief at BIS, as indeed from the title, Employment
12 Relations, Consumer Affairs and Postal Affairs, which
13 was very wide-ranging, even within those topics,
14 including competition policy and insolvency and European
15 liaison on different issues. So that had more of my
16 time but, obviously, the Women and Equalities role also
17 took time, so, across the four days that I was able to
18 spend on my ministerial commitments during the week,
19 with the other three days, obviously being spent in my
20 constituency working, I would say probably about 80 per
21 cent of my time was spent on the BIS portfolio.
22 Q. Thank you very much. I'm going to get into trouble with
23 the stenographer, I imagine, if you don't speak slightly
24 slower, if you may?
25 A. I will do my best.

3

1 a Unique Reference Number of WITN10190100 and that will
2 be uploaded to the Inquiry's website?
3 You are formally a Liberal Democrat Member of
4 Parliament?
5 A. That's right.
6 Q. You were an MP between 2005 and 2015 and then again
7 between 2017 and 2019; is that correct?
8 A. Yes.
9 Q. You have been both the Deputy Leader and then
10 subsequently Leader of the Liberal Democrat party?
11 A. Yes, I have.
12 Q. Relevant for today's purpose, you were Parliamentary
13 Under-Secretary for Employment Relations, Consumer and
14 Postal Affairs --
15 A. (The witness nodded)
16 Q. -- between 6 September 2012 and 8 May 2015; is that
17 correct?
18 A. That is correct.
19 Q. That was during the Coalition years?
20 A. Yes.
21 Q. At the same time, I think you were also Parliamentary
22 Under-Secretary of State for Women and Equalities?
23 A. Yes.
24 Q. Some of that time, I think 18 December 2013 to 30 June
25 2014, you were also on maternity leave?

2

1 Q. Thank you. Employment relations, Consumer and Postal
2 Affairs. How do you divide that 80 per cent of your
3 time up between the three?
4 A. I think in my total ministerial time, probably about 15
5 per cent might have been spent on postal affairs.
6 I think it would also be worth noting that it was not
7 static, so it would depend on what the issues were at
8 the time. So, for example, during my time as
9 a Minister, I took five different Bills through the
10 House of Commons and Bills just eat your time. Hours,
11 and hours, and hours of debates in committee report
12 stage in Parliament but all of the preparation in terms
13 of the policy development, the engagement with different
14 groups about what goes into those Bills.
15 So at the points where a Bill was being taken
16 through, then that would be eating up a huge amount of
17 my time and none of those Bills that I did were in the
18 postal services area.
19 And so that -- yeah, it varied but, probably on
20 average, about 15 per cent on Post Office and I note
21 that when I came back from maternity leave, for example,
22 and I had the deep dives in the different areas of my
23 brief, I had those on six different areas of which one
24 was postal affairs and, of course, within postal
25 affairs, there was a broad range of different issues to

4

1 be considering.

2 **Q.** Thank you. In terms of the actual post, Minister for
3 Postal Affairs, did you see your role as being
4 accountable to Parliament for the Post Office?

5 **A.** Yes, definitely Parliamentary accountability was
6 a necessary part of the role, not least because
7 Parliament is one of the places where, you know -- with
8 the exception of Select Committees -- Post Office
9 officials can't actually themselves answer any
10 questions. So if a question was to be asked in the
11 House of Commons, either written or orally, then it had
12 to be a Minister who would be answering that. So that
13 Parliamentary accountability was definitely part of the
14 role.

15 **Q.** You're accountable to Parliament for the Post Office.
16 Who is the Post Office accountable to, in your view?

17 **A.** Ultimately, the Post Office is accountable to its
18 shareholder, which the Government, and then, of course,
19 in terms of, you know, wider general accountability, as
20 a public institution, through, you know, members of the
21 media and others, there are ways in which that
22 accountability operates in other spheres too.

23 **Q.** I'd like to take you to a passage from your witness
24 statement, if we could bring up on screen WITN10190100.
25 It's paragraph 112, that is on page 47. At

5

1 certainly campaigned against Post Office closures in my
2 constituency in East Dunbartonshire, and it struck me
3 this was one of the issues that didn't matter if you
4 were Labour, Conservative, Liberal Democrat, SNP,
5 whatever, you cared about your local post offices.

6 So that was a very contentious political issue and
7 I think we heard from Pat McFadden earlier this week how
8 obviously that was a big issue in the years immediately
9 preceding the Coalition Government. So, therefore,
10 securing the future network, stabilising that network
11 was a very strategically important goal.

12 That was obviously linked to financial
13 sustainability and one of those areas was the Government
14 services, so how to make sure the Post Office could have
15 a sustainable future, contracts such as the Post Office
16 Card Account or the Driver and Vehicle Licensing Agency,
17 passport renewals, these would be contracts that
18 Government could give to Post Office and, as a minister,
19 I would be engaged in discussions with other ministers
20 in other departments about trying to make sure Post
21 Office would be a provider, and there was a long-term
22 issue of mutualisation as well.

23 **Q.** Thank you. Another term that we're going to come to is
24 "arm's length", is that something that was ever
25 explained to you as to what that meant in practice

7

1 paragraph 112 you say as follows:

2 "... I do find the accountability placed on
3 Ministers for [the Post Office] was not matched with the
4 levers available to Ministers to affect or influence
5 what [the Post Office] was doing. It was always made
6 clear to me that it was not for me as Minister to
7 interfere with operational matters, and it was only
8 feasible to engage with the most serious and
9 strategically important objective and aims of the Post
10 Office."

11 I'd like to focus on that division. Can you assist
12 us with how you saw operational matters; what were
13 operational matters for you?

14 **A.** I think the first thing would say is I was never
15 presented with, nor necessarily spent a huge amount of
16 time critiquing, what was operational and what was
17 strategic. It wasn't like there was some list of
18 criteria somewhere. It was a division which was
19 interpreted probably with a bit more fluidity than that
20 but, clearly, in terms of strategic matters, that would
21 include issues such as the size and the future
22 sustainability and health of the Post Office Network,
23 the context for this being that we had recently had very
24 significant Post Office closures, which every MP in
25 Parliament had been affected by and exercised by. I'd

6

1 between the Government and the Post Office or you and
2 the Post Office?

3 **A.** It wasn't defined in the sense of here's a criteria, but
4 it was obviously referenced -- not necessarily always
5 with that terminology but it was referenced in terms of
6 the briefings I would receive that would say, of course,
7 this is an operational matter. And it did -- I mean, to
8 me I recognised that, with the variety of things I was
9 dealing with as a minister, I wasn't in a position to
10 either have the expertise of how to run a company on
11 a day-to-day basis nor indeed would I have the time to
12 be able to do so. So that operational strategic
13 distinction seemed to make sense to me.

14 **Q.** We're going to look at correspondence and we're going to
15 look at particular events but, structurally, what did
16 you see the role of ShEx being in respect of the Post
17 Office?

18 **A.** So at this time, ShEx were part of BIS and, although
19 they were slightly separate, I think they were on
20 a different floor in the building, I also viewed them
21 really as part of the Department, and I mean when
22 I initially started, I don't think I was told that there
23 was a specific difference, that became clear to me in my
24 time as Minister. But I viewed the team of officials in
25 ShEx, who would come and brief me on Post Office, in

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1 a similar way that I would view the team who would brief
 2 me on competition policy or on employment rights, or on
 3 insolvency, that these would be teams of officials
 4 within the Department, who were there to support me in
 5 my work as Minister and to fulfil the duties of the
 6 Government Department.

7 And the differential with ShEx was not particularly
 8 clear, even when, obviously, I was aware it was
 9 a different section. I was aware there was a slightly
 10 different culture within ShEx, it was a bit more
 11 commercial. They probably, you know, held themselves
 12 a little bit more as -- maybe, dare I say, sometimes
 13 slightly superior, in that sense, you know, that they
 14 were the ones dealing with the commercial matters and it
 15 had obviously recruited a lot of people from corporate
 16 finance or consultancy backgrounds.

17 I probably wasn't aware at the time quite the extent
 18 to which that recruitment was not within the normal
 19 Civil Service pools of recruitment.

20 **Q.** We're going to see a number of ministerial submissions
 21 and briefings. In respect of the Post Office, would
 22 they all come from ShEx, or would other members of the
 23 Department --

24 **A.** I mean, I wouldn't want to be absolutely categorical but
 25 I think so. I think the main post office team was in

1 getting back up to speed on the different aspects of my
 2 portfolio and, you know -- but it will have been in the
 3 context of "Here's Richard, Will has gone somewhere
 4 else, Richard is now briefing on Post Office".

5 I did realise, and I did know that he was on the
 6 Board but I think I hadn't made the connection, until
 7 much more recently, in these preparations, that
 8 actually, yes, that was a very significant change in how
 9 that was structured, and it, as I say, isn't one that
 10 was flagged to me and I think it is one where, as I set
 11 out in my witness statement, I think there are real
 12 concerns about that role being combined because it means
 13 that there is less opportunity for kind of challenge if
 14 the other people of the Post Office team are then
 15 reporting to him, because he was the most senior person
 16 within that specific Post Office team.

17 **Q.** Specifically in terms of the Non-Executive Director, the
 18 Post Office Board member, who did you consider they were
 19 accountable to?

20 **A.** Ultimately to ministers. There would obviously also be
 21 a sort of line management responsibility through the
 22 senior officials within ShEx and then ultimately in that
 23 way through the Permanent Secretary of BIS. I believe
 24 that as part of BIS, you know, Martin Donnelly, as
 25 Permanent Secretary, would ultimately have oversight of

1 ShEx and I am trying to think if there was a kind of
 2 example of something. I mean, there would be
 3 discussions between private offices sometimes, between
 4 my private office and Vince's private office. So, yeah,
 5 but, I mean, I would say the vast, vast, vast majority
 6 would come from ShEx.

7 **Q.** Thank you. There were some structural or personnel
 8 changes over the time that you were in office. I think
 9 Susannah Storey was the Post Office Shareholder
 10 Non-Executive Director when you first started, and Will
 11 Gibson was the head of the Post Office Shareholder Team
 12 in ShEx, and then in 2014, Mr Callard held both of those
 13 roles. Is that something that you noticed, the
 14 structural change or significant change in that respect?

15 **A.** No, and it wasn't explicitly flagged to me. In fact,
 16 I'm not certain I met Susannah Storey. I may have done
 17 but I certainly did not meet with her regularly, in the
 18 way that I met with Will Gibson, in terms of the
 19 briefings that I was receiving in that period, in late
 20 2012 and in 2013.

21 I, of course, then was away for the beginning six
 22 months of 2014, and so when I came back from maternity
 23 leave, Richard Callard was there, and so I presume I got
 24 introduced to him in the catch-up days that I had
 25 towards the end of my maternity leave, when I was

1 how ShEx was operating through the Chief Executive or
 2 senior official within ShEx. So there would be both
 3 a main line of accountability through the civil service
 4 and then ultimately, obviously, for everything that goes
 5 on in the Department, ministers have ultimate
 6 responsibility.

7 **Q.** How about in respect of the Post Office?

8 **A.** So, I mean, in terms of shareholder -- could you just?

9 **Q.** Yes, in terms of that shareholder, the Non-Executive
 10 Director, you've explained that they're accountable to
 11 the Department. In respect of their accountability to
 12 the Post Office, did you see another line of
 13 accountability there?

14 **A.** I mean, I obviously they were -- that particular
 15 individual was a non-executive on that Board and that
 16 comes with specific duties as a Director, as set out in
 17 law, in terms of oversight of a Board. All directors,
 18 whether they're in this unusual situation of being
 19 a civil servant who's a Director on a Board of
 20 a Government-owned body or, indeed, any Executive or
 21 Non-Executive Director, would have those roles and
 22 responsibilities in terms of that accountability.

23 So, yeah, I mean, they would have those
 24 responsibilities and I imagine there might be occasions
 25 where they would perhaps recognise there would be

1 a conflict. I know sometimes that Non-Executive
2 Director would recuse themselves from a Post Office
3 decision, in those circumstances.

4 **Q.** Thank you. I'm going to move on now to early briefings
5 that you received on taking up your post. Could we
6 please start with UKGI00041975, please. You started on
7 6 September, this is 17 September. It is a briefing for
8 your meeting with the Chair and CEO of the Post Office.
9 It begins:

10 "Purpose

11 "This is your first meeting with Alice Perkins and
12 Paula Vennells ..."

13 It sets out there, if we scroll down, your
14 objectives and the purpose. One of your objectives
15 being:

16 "To understand Alice and Paula's priorities for the
17 business."

18 And what are their objectives? Those are set out
19 as:

20 "To set out her vision for the business, progress
21 [Post Office] is making against plan, and any key areas
22 of concern.

23 "To underline the importance of new revenue and
24 Government work in securing a viable future for the
25 network. Alice and Paula are likely to seek your

13

1 timeshares and the, you know, issues of British Summer
2 Time. I mean, there was lots of, you know, bizarre
3 things you wouldn't necessarily assume were in the
4 portfolio. So I would often find out what was in my
5 portfolio when I would receive correspondence that I was
6 being asked to answer, so clearly that was in my
7 portfolio, and then I would have these briefings but, by
8 the second week in the role, I had not had all of those
9 briefings.

10 This particular meeting, as an introductory meeting
11 with both Alice and Paula, obviously contained in the
12 annexes that was referenced in that briefing note some
13 background information about Post Office and, therefore,
14 this would have been one of the first opportunities for
15 me to really dig into what the priorities were.

16 I obviously knew that -- you know, referencing, you
17 know, my own experience as a constituency MP and the
18 wider political context, that the issues around closures
19 and security of the network were clearly going to be
20 significant but the other issues there, you know, the
21 specifics of Government contracts and mutualisation were
22 brought to me in that note, and in that half-hour
23 meeting I was able to explore that with Alice and Paula
24 to some extent.

25 **Q.** If I can stop you there, that's what is in the note.

15

1 support in this area."

2 If we scroll over the page, we can see the various
3 areas that are likely to come up in your discussion with
4 Alice Perkins and Paula Vennells. Do you recall who
5 drafted this at all?

6 **A.** I mean, I don't recall. I would imagine the first page
7 would often have a named civil servant on it, that would
8 be certainly where I would go to look at --

9 **Q.** Yes, there isn't on this one.

10 **A.** In which case, I don't know but I would imagine it would
11 have been the ShEx team. I don't know exactly who it
12 would have been.

13 **Q.** Thank you. If we scroll down, we can see the various
14 areas. There isn't an area here that refers to Horizon
15 or complaints from subpostmasters or anything along
16 those lines. When you started as Postal Affairs
17 Minister, did you have any initial briefing in respect
18 of the allegations that were being made by
19 subpostmasters -- we'll come to a specific email a bit
20 later on but when you first started?

21 **A.** So this meeting was I think in my second week in the
22 role and I -- you know, I was still at that point having
23 briefings to get up to speed on different aspects of --
24 even -- to be honest, even being aware of exactly what
25 different things fell into my portfolio. So, you know,

14

1 What's not in the note is any briefing on Horizon.

2 **A.** Yes, and --

3 **Q.** Were you in those early days briefed on issues with the
4 Horizon system?

5 **A.** No, not in a sit-down briefing. There was a piece of
6 correspondence which you say we're going to come to, but
7 no, that was not separately briefed to me.

8 **Q.** Were you aware that the Post Office prosecuted people?

9 **A.** I don't believe I was at that point. In fact, I think,
10 I probably wasn't until the following July when I was
11 preparing for the oral statement in the House.

12 **Q.** We've discussed the difference between operational
13 matters and serious or strategically important matters.
14 Where would you see the prosecution of subpostmasters
15 fit between those two distinctions?

16 **A.** I think in the normal running of the business, of any
17 business, you would expect that, if there were concerns
18 about fraud, and so on, that they would -- that would be
19 undertaken and done so through the usual channels. And
20 my assumption would have been, of course, that that
21 would have been done by handing information to the
22 police and the Crown Prosecution Service, making
23 decisions in the way that would happen for any other
24 business.

25 So the very specific and unusual nature of what the

16

1 Post Office were doing was not brought to my attention
 2 and, indeed, even very -- as late as 2015, I was kind of
 3 asking questions to be reassured or to be very clear
 4 about the exact nature of that and was being told that
 5 it was the same as any other private individual or
 6 institution that could bring prosecutions. So I don't
 7 believe that that properly reflects how unusual that
 8 situation was but I also don't think I was given that
 9 information accurately that explained that situation.

10 **Q.** When you started, whose responsibility would it have
 11 been to have given you that information?

12 **A.** I think that information should have been given to me by
 13 the relevant Civil Service officials.

14 **Q.** At that time, who would that have been?

15 **A.** Well, I mean, there was a team. I think Will Gibson was
 16 the head of that team and there was obviously number of
 17 Civil Service officials within that team.

18 **Q.** Could we please turn now to UKGI00001458 (*sic*). This is
 19 a letter from you to another Member of Parliament, if we
 20 start on the first page, please. I'm sorry, this is the
 21 wrong document. Ah, it should be 49, sorry.
 22 UKGI00001459.
 23 A letter to a Member of Parliament, and it says as
 24 follows:
 25 "Thank you for your letter of 20 August to Norman
 17

1 So that's the same day as the briefing that has been
 2 prepared that doesn't mention Horizon. Can you recall
 3 the circumstances in which this was signed, agreed by
 4 you?

5 **A.** I received a box every evening and that had a variety of
 6 maybe 15/20 different submissions for me to read,
 7 a diary pack, which would have included the briefing
 8 notes for the meeting I had the next day -- all of the
 9 meetings I had the next day -- and then also there would
 10 be any Parliamentary Question answers, and a stack of
 11 correspondence, and so this letter would have been in
 12 one of those correspondence folders. I would have
 13 reviewed this letter and signed it amongst maybe another
 14 15 or 20 letters. And, from the documents I've been
 15 shown by the Inquiry, which were only recently made
 16 available, in this perspective, then I asked for
 17 a little further information on this because I thought
 18 it was something which, you know, would require more
 19 information, I imagine.

20 I don't have a memory of the exact -- what was going
 21 through my mind in, you know, week 2 of the job, with
 22 a massive box to be doing that evening, but clearly
 23 I asked for a short note on the matter to bring me up to
 24 speed.

25 **Q.** Can you recall who drafted this letter?
 19

1 Lamb ..."
 2 That's your predecessor?

3 **A.** Mm.

4 **Q.** "... about the independent review by forensic
 5 accountants, of a number of individual cases raised by
 6 former subpostmasters, who raised concerns about the
 7 Post Office's Horizon system with their [Member of
 8 Parliament]. I am replying as this matter now falls
 9 within my portfolio.

10 "I should first note, that Post Office Limited
 11 continues to express full confidence in the robustness
 12 and integrity of its Horizon system and related
 13 accounting processes. Over the past 10 years, many
 14 millions of branch reconciliations have been carried out
 15 with transactions and balances accurately recorded on
 16 Horizon, by more than 25,000 different subpostmasters in
 17 total."

18 The next paragraph refers to the Post Office having
 19 agreed to an external review, and it says:
 20 "The external review of specific individual cases is
 21 being undertaken by a firm of forensic accountants and,
 22 to ensure impartiality, James Arbuthnot has reviewed and
 23 approved the appointment. I understand the review
 24 process is now under way and I have asked to be kept
 25 informed of developments."
 18

1 **A.** No, and I wouldn't have known who drafted the letter
 2 because, unlike the submissions that would come to me
 3 that would have typically a civil servant name at the
 4 top of them, the correspondence would just be in
 5 a folder that would have the letter that I had to sign,
 6 and often that would be clipped in front of the letter
 7 that it was responding to.

8 **Q.** So we've seen the briefing to you on the day before you
 9 meet the Chair and the CEO of the Post Office, which
 10 doesn't mention any issue to do with Horizon. We have
 11 this letter of the same date. Is it odd that there is
 12 no mention of Horizon or of the underlying issues that
 13 are referred to here in that briefing for your meeting?

14 **A.** Well, I didn't think it was odd at the time. Obviously,
 15 it was a half-hour meeting with the Post Office, and it
 16 was the first time I was meeting with the Chief
 17 Executive and the Chair. You know, there was already
 18 lots to cover in terms of that meeting and it clearly
 19 wouldn't be able to cover every single aspect of
 20 everything to do with the Post Office.

21 And, obviously, what I was being told in this
 22 letter -- often the information that you would get as
 23 a Minister, as I say, you'd find out what was in your
 24 portfolio by what letters you were being asked to sign
 25 at the beginning of your time as a Minister, and you
 20

1 would take the information that had been put down in the
2 letter as, you know, useful information for you to be
3 aware of, and this was explaining, obviously, that there
4 was an external sudden review being undertaken, so it
5 looked like there was something being done about
6 an issue that had been raised.

7 It was not clear to me, at that point, that this was
8 a wide issue in terms of the number of people affected,
9 in fact it was saying that there was not a large number
10 of people affected and, indeed, that there was action
11 being undertaken. So I don't think that would have
12 seemed odd to me at the time.

13 **Q.** Was it a topic that was raised by Paula Vennells or
14 Alice Perkins at your meeting the next day, the
15 involvement of Second Sight or --

16 **A.** No.

17 **Q.** -- complaints by subpostmasters?

18 **A.** No, it was not.

19 **Q.** Could we please turn to UKGI00001457. I think this is
20 the email you were referring to. It's an email from
21 Mike Whitehead of 4 October 2012. If we scroll down, we
22 can see that Mike Whitehead was in the Shareholder
23 Executive. Was he somebody who regularly briefed you?

24 **A.** Yes, he was. He was part of that team.

25 **Q.** He has sent this to -- if we scroll up, it's an email

21

1 issues referred to in the reply. This is now attached."

2 So it seems as though you've agreed that letter but
3 have asked for a note to summarise the position.

4 **A.** Yes.

5 **Q.** He also says:

6 "We are also currently dealing with a [Freedom of
7 Information Act] request from an investigative
8 journalist relating to our contacts with [the Post
9 Office] and meetings with/briefings for ministers in the
10 context of the integrity and performance of Horizon."

11 We will come on to have a look at that as well.

12 **A.** Sure.

13 **Q.** The briefing can be found at UKGI00018248. Sorry,
14 that's the Freedom of Information one.

15 Can we please turn to UKGI00001458. So this is the
16 attachment from the email to Mr Whitehead, I'm just
17 going to read to you a few passages from it. In the
18 second paragraph, about halfway through that second
19 paragraph, it says:

20 "Since Horizon's introduction, there has been
21 a small trickle of cases referred to Ministers from or
22 on behalf of former [subpostmasters] who have had their
23 contracts terminated by [the Post Office] for financial
24 'discrepancies or shortages' (falling within the range
25 of theft, false accounting or negligence) who have

23

1 account that we will see a number of times today,
2 Swinson MPST; is that your private office?

3 **A.** Yes, that's my private office, it was an email address
4 that went collectively to all of my private secretaries
5 and then the relevant private secretary, who was
6 covering the particular brief would respond to whichever
7 emails were in their brief.

8 **Q.** So although it has your name, that doesn't mean it's
9 an email to you personally?

10 **A.** No, indeed, I would not have seen emails to Swinson
11 MPST. I did not have email access until the very end of
12 my time as a Minister. Everything was done through
13 paper boxes.

14 **Q.** Okay, and who was Claire?

15 **A.** Claire was one of my private secretaries. At that
16 stage, she was the Private Secretary who covered Post
17 Office matters but also, if I recall rightly, some of
18 the consumer and competition matters, I think. But
19 then, later on, she took on the role as the Head of my
20 Private Office after Emily Cloke left.

21 **Q.** Thank you. Mr Whitehead says as follows:

22 "At a recent meeting with Jo, in the context of
23 having signed off the attached pdf reply to John Pugh MP
24 [and that's the letter we just looked at], she asked for
25 a short note summarising the position with the Horizon

22

1 claimed that there are systemic faults with Horizon
2 which have caused the losses rather than theft or other
3 financial malpractice by themselves or members of their
4 staff/family."

5 Scrolling down:

6 "[The Post Office] has consistently defended Horizon
7 on the basis that the system has been in place for over
8 10 years; in a typical month Horizon conducts around
9 80 million customer sessions with 230 million
10 transactions across the system. This is delivered
11 through around 35,000 counter positions in nearly 12,000
12 post offices which perform weekly and monthly accounting
13 balances. Around £175 million per day is settled to
14 over 700 client companies who use [the Post Office] --
15 a substantial flow of data to and from organisations
16 with regularly audited accounts. Over its extensive
17 period of operation the system has proved robust.

18 "[The Post Office] cites the cases identified by
19 [ex-subpostmasters] where there is some kind of
20 allegation in respect of Horizon as being a minuscule
21 proportion of the many millions of accounting events
22 that subpostmasters have undertaken since 2000. [The
23 Post Office] believes that if there were any systematic
24 integrity issues within the system they would have been
25 evident over the past 10 years. Both the [National

24

1 Federation of SubPostmasters] and the CWU that have
2 expressed full confidence in the system."

3 Pausing there, do you recall reading this briefing?

4 **A.** No, I don't recall reading it. I'm certain that I will
5 have done, having asked for it, and that looking at it
6 now, I can certainly say that this would have been
7 a reassuring note. It was saying that there was a lot
8 of subpostmasters, a lot of transactions, lots of big
9 numbers used there, making the case that there was
10 a tiny proportion, a minuscule proportion, it says, and
11 then also it explains that there is a process in place
12 to try to resolve it.

13 So it was definitely a reassuring message that was
14 being given and that it wasn't, therefore, going to be
15 something that was going to, it seemed to me, require
16 attention. As I say, it's not a memory that
17 I specifically have but I'm pretty confident from
18 reading it now that that will have been how I viewed
19 that note.

20 **Q.** Does it reflect conversations that you had at the time?

21 **A.** I mean, I imagine so. I think the other thing that's
22 worth just noting is that this note does not mention
23 prosecutions. So it is in the context of subpostmaster
24 contracts being terminated, which I appreciate will
25 still have been a massive problem and very distressing

25

1 Could we now then move on to the document that
2 I just brought up on screen, which is the submission
3 relating to the Freedom of Information Request. That's
4 UKGI00018248. So this is from Mr Whitehead. Was
5 Mr Whitehead the author of that previous document we
6 looked at? I know he sent it to you.

7 **A.** I mean, I can't confirm that. I think it's a fair
8 assumption to make but I can't be certain.

9 **Q.** Thank you. If we scroll down, we can see the summary.
10 It says there's been a Freedom of Information Request
11 from an investigative journalist:

12 "[It] covers the Department's engagement with Post
13 Office Limited with regards to concerns and criticisms
14 from a number of former subpostmasters who believe that
15 Post Office's accounting system (Horizon) is responsible
16 for their contracts being terminated by Post Office
17 Limited. The Department has always supported Post
18 Office Limited's assertion that the system is robust."

19 It then refers to Second Sight having been appointed
20 and it says:

21 "Post Office Limited is confident that the
22 independent review will support their view that the
23 system is robust and fit for purpose. However, the
24 review has sparked some interest, including this
25 [Freedom of Information Request]."

27

1 for those subpostmasters. But it also doesn't suggest
2 a criminal prosecution level of this.

3 **Q.** It goes on to say:

4 "Accordingly, [the Post Office] has consistently and
5 publicly expressed full confidence in the robustness,
6 integrity and accuracy of Horizon and long resisted
7 periodic calls from former [subpostmasters] for
8 an independent review/audit of the integrity of the
9 system. A lobbying campaign group 'Justice for
10 Subpostmasters Alliance' was established in 2009 and
11 claims a membership of around 100 members but details
12 only 14 specific [complaints]."

13 Then it goes on to talk about potential legal action
14 that was going to be brought. If we scroll down over
15 the page, as you say, there's reference over the page to
16 the Post Office agreeing to commission an external
17 review of a small number of individual cases:

18 "It was agreed that this review would be conducted
19 by a firm of forensic accountants ..."

20 Then at the bottom it says:

21 "In response to any enquiries to Ministers/the
22 [Department] about individual cases being put forward
23 for review, the replies explain that any cases should be
24 referred to James Arbuthnot MP for consideration through
25 their constituency MP."

26

1 If we scroll over the page, we can see the request
2 that was made for various copies of documents that
3 pertained to the integrity and performance of the
4 Horizon and Horizon Online system. If we scroll down to
5 paragraph 9, the proposal is to release 28 items of
6 information but to withhold 10 items.

7 Can you recall any discussions with Mr Whitehead
8 about this request?

9 **A.** No, this was a submission in my box, alongside many
10 others on that evening, on whatever date that it came to
11 me, that I would have read and responded to with
12 a decision.

13 **Q.** Could we please turn to UKGI00013747. We are now in
14 November. Before we were on 23 October, so we are now
15 in the next month. This a letter to another Member of
16 Parliament in respect of their constituent and, again,
17 it starts off by saying:

18 "I have noted your constituent's concerns about his
19 experiences as a subpostmaster but should explain that
20 Post Office Limited is fully confident about the
21 robustness and integrity of its Horizon system and
22 related accounting process. Since the Horizon system
23 was introduced in 2000, many millions of branch
24 reconciliations have been carried out with transactions
25 and balances accurately recorded on Horizon by more than

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1 25,000 different subpostmasters in total.
 2 "I am also aware of a small number of incidents
 3 where subpostmasters' contracts have been terminated and
 4 in some cases court action has subsequently been taken,
 5 following the identification of financial discrepancies
 6 and shortages. Neither I, nor the Department are able
 7 to comment on, or intervene in individual cases
 8 concerning operational and contractual matters."
 9 Then it sets out enquiries that have been made with
 10 the Post Office and, if we scroll down, we can see at
 11 the bottom of the second page it says:
 12 "It is worth noting that subpostmasters are
 13 contractually responsible for all losses occurred."
 14 If we go over the page, it again says:
 15 "Whilst, as noted above, subpostmasters are
 16 contractually liable for all losses at their branch ..."
 17 It ends by saying:
 18 "Should you wish to suggest that Mr Patel's case can
 19 be examined by the forensic accountants, I recommend you
 20 contact James Arbuthnot's office to discuss its possible
 21 inclusion in the cases being reviewed by forensic
 22 accountants."
 23 Can you assist us with who would have drafted this
 24 response?
 25 A. I can't tell you a name but it would have been somebody
 29

1 servant from the Permanent Secretary's office agreed to
 2 look at my correspondence for a week before I saw it,
 3 and she concluded there was a big correspondence quality
 4 problem in the Department, and then measures were taken
 5 to deal with it. And I remember her saying to me "This
 6 is not what you should expect. What you should expect
 7 is that you get the letter, you quickly scan it and you
 8 can sign it".
 9 So that information had been given to me to
 10 recognise that, although clearly I needed to be aware
 11 and sign the correspondence, that was not something
 12 which there would be meetings held about each individual
 13 letter or indeed that it would be something where
 14 I would be expected to spend a very long amount of time
 15 on each letter, nor indeed Would that have been
 16 feasible.
 17 Q. Irrespective of the particular individual letter, the
 18 correspondence we've been looking at all carries the
 19 same kind of message --
 20 A. Yes.
 21 Q. -- a small number of cases, trickle, et cetera. What
 22 kinds of discussions at this point in time were you
 23 having within your Department about the accuracy of that
 24 information?
 25 A. As I say, I'd raised general concerns about the quality
 31

1 within that team at ShEx, would be my assumption,
 2 because the way that correspondence worked was that it
 3 came in to the Department, was processed by the
 4 Correspondence Unit, and they then sent it to the
 5 relevant policy team to get a draft response, and it was
 6 then sent to my private office for printing and putting
 7 in my box.
 8 Q. Would you have discussed it with anybody before agreeing
 9 it?
 10 A. No, routinely my correspondence, as I say, would be
 11 a stack every evening in my box, after doing all of the
 12 rest of the submissions in my box, and so the normal
 13 process would be that I would scan the letter and sign
 14 it. And I think it's important to actually just make
 15 that point. Early on in my tenure as Minister, I became
 16 very unhappy with the standard of correspondence that
 17 I was receiving. Frequently, there would be lots of
 18 typos, letters that I would have to send back, there
 19 would be sentences that were not finished and it was
 20 actually very stressful because, of course, you know, it
 21 was taking me a long time to go through my box and then
 22 that meant I was having to see letters more than once
 23 and so that just expanded the amount of time that had to
 24 be spent.
 25 And I actually escalated that. A senior civil
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1 of correspondence, this was not specifically about the
 2 Post Office team, that was in general sense to say
 3 correspondence is important, it needs to be accurate.
 4 I recall taking part in workshops for Civil Service
 5 officials where I, you know, did a little speech about
 6 how important correspondence was because this is people
 7 writing to their MP, and then writing to the Minister
 8 and this is an important part of our democracy and
 9 therefore isn't something that should be left to the
 10 last minute and come to me three months after somebody
 11 has actually written a letter.
 12 So that was, in a general sense, that message was
 13 going out there but, as I say, in terms of specific
 14 cases and specifically in terms of Horizon, at this
 15 stage, it was not the subject of particular meetings.
 16 When the correspondence came to me, it was clear
 17 that there was a process in place with the forensic
 18 accountants, Second Sight, and so it felt to me that
 19 that was the appropriate place for these specific issues
 20 to be investigated, where the expertise would lie.
 21 I clearly wasn't going to be in a situation of being
 22 able to pick through the details of individual cases and
 23 come to a sensible conclusion about them nor would that
 24 have been appropriate.
 25 Q. If we scroll up on to the first page -- scroll down --
 32

1 sorry, thank you -- to the final paragraph on that page,
2 it says:

3 "... I have made enquiries with [the Post Office]
4 with regard to [the particular case]."

5 Now, you're not expected to have made personal
6 enquiries but is it slightly odd that a Member of
7 Parliament is conveying what they're being told by Post
8 Office Limited, rather than being told to approach Post
9 Office themselves, for example?

10 **A.** So, I mean, obviously the "I" in that sentence is an "I"
11 which obviously relates to the wider Civil Service and
12 so, when I read this to sign it, I take the view that
13 the officials have gone to Post Office. And I mean
14 there's two ways of dealing with a letter like this.
15 You can have what we call our standard lines, where you
16 have some pre-agreed text on an issue, particularly for
17 those kind of postcard campaigns, where you get dozens,
18 and dozens, and dozens of the same issue, where you can
19 just give a *pro forma* standard line response that's been
20 agreed.

21 But, clearly, that doesn't feel quite appropriate
22 when you're dealing with individual cases like this and
23 so I probably would have considered that it was actually
24 helpful to get something that was more of a bespoke
25 response and, to do that, I think the way to do that

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1 terminal with some screens. It wouldn't have been --
2 the thing I remember most from that visit, I have to
3 say, is the Post & Go equipment, which was quite new at
4 that point, a little bit like the self-service areas in
5 supermarkets, and so I remember thinking that was quite
6 novel and not being sure how it was going to be received
7 in post offices. But I am sure I did, you know, get to
8 look at a Horizon terminal briefly and will have seen,
9 you know, a screen with different computer options on
10 it, probably not the most exciting part of the visit.

11 **Q.** It's meeting with the CEO. We've seen those letters,
12 we've seen a growing picture of complaints from
13 subpostmasters, issues with Horizon. Did that come up
14 in conversation at all?

15 **A.** I don't think so. At this stage, there had been some
16 correspondence but, as I've explained, that
17 correspondence is not something which is taking a huge
18 amount of time to deal with, and so the real
19 significance of this issue did not sink in for me at
20 this stage in my ministerial tenure about what was
21 happening with Horizon. I don't think the issue of
22 prosecutions had particularly been raised by this point.
23 For me, at this stage, it was definitely in the category
24 of there were some people who had some concerns, Post
25 Office being very robust that those concerns were not

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1 obviously would have been for them to go to Post Office
2 Limited. There were obviously different ways of doing
3 it. So when I was an MP and I was dealing with
4 constituency correspondence, you know, I would write to
5 agencies, you know, whether it was the Pensions Service
6 or the Department for Work and Pensions and then close
7 my constituent's correspondence and then get an answer
8 from that agency, and then send that answer with
9 a covering letter.

10 That would have been another way to do this but, in
11 this case, you know, they obviously were making the
12 enquiries directly but they've also clearly flagged that
13 they've gone to Post Office to ask about this.

14 **Q.** Thank you. Could we please turn to UKGI00001534,
15 please.

16 I'm being asked if we'd could slow down in speaking,
17 if possible. Thank you.

18 Moving now to 12 November, it appears that you
19 visited the Post Office Headquarters and had a meeting
20 with Paula Vennells and Kevin Gilliland, and that
21 included, if we see in the first paragraph,
22 a demonstration of Horizon; is that something that you
23 recall?

24 **A.** I can't say I have a vivid memory of the demonstration
25 of Horizon, beyond potentially seeing a computer

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1 well founded and that there was a forensic process to
2 look into them, which was reassuring.

3 **Q.** Thank you. I'm going to move on now to the events
4 leading up to Second Sight's Interim Report and can
5 I please take you back to your witness statement on
6 paragraph 21. It's page 8. I'm just going to read from
7 paragraph 21 of your statement. You say as follows:

8 "My clear memory of first realising the possible
9 importance of the Horizon issues was a meeting with
10 Paula Vennells and Alice Perkins in which I was told
11 about the impending publication of the Second Sight
12 Interim Report. I cannot be certain about the timing as
13 I do not have access to my Ministerial Diary but it
14 would most likely have been in June 2013. I recall the
15 genesis of the meeting being slightly mysterious. It
16 was not in the usual cycle of my regular catch-ups, and
17 unusually, I did not have a briefing note for the
18 meeting in my diary pack for that day. I would not
19 typically meet Paula Vennells and Alice Perkins
20 together. I cannot recall many details of the
21 conversation, but do have a recollection that their tone
22 was quiet and serious as they explained the background
23 to the report. I felt that they were very keen to
24 reassure me that they were taking it seriously but
25 everything was under control, and I would receive

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1 a further update from them shortly."

2 Can you assist us with the description you've used
3 there, "slightly mysterious"; what exactly do you mean
4 by that?

5 **A.** Normally I would have a diary pack prepared for me for
6 the following day and it would have each of my meetings
7 set out with a note/information about what to expect,
8 similar to the one which we saw earlier about the
9 meeting that I had -- the introductory meeting in the
10 middle of September, and this didn't have that note. So
11 in my mind, I was like, well, what is this about? And
12 it wasn't clear from it being in my diary. So fine,
13 okay, I mean, I did my box that evening but I was
14 unclear as to what the purpose of this meeting was until
15 I was in the meeting, and that was slightly unusual, and
16 therefore slightly mysterious.

17 **Q.** You say you didn't have a briefing note. Who would you
18 have expected to have produced briefing note for that
19 meeting?

20 **A.** So my understanding of the process was that policy
21 officials would produce briefing notes for any meetings
22 within their policy areas, so, in this case, it would be
23 the ShEx team, and then my Diary Secretary, who was part
24 of my private office, would each day collate, you know,
25 a front sheet with actually what my diary looked like

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1 how this came to be but my private secretaries would not
2 have been in a position to be able to give me full
3 details because they would have been asked for, you
4 know, an important meeting. They might have been told
5 a line or two as to why that was important. But -- and
6 I'm sure, had I been in the Department when I read that,
7 you know, rather than being given it to go home in my
8 box, and I'd asked them, they would have then told me,
9 that this is about the Horizon issues.

10 But, as I was not physically with my private
11 secretaries when I was reading it, because I was at
12 home, then it wasn't clear to me what it was until I got
13 there.

14 **Q.** Thank you. If we scroll down, there's nothing you'd
15 like to add to that paragraph in respect of your
16 recollection of the actual meeting itself, is there?

17 **A.** I mean, I obviously remember various conversations in
18 the run-up to the statement in early July. What's hard
19 for me is to distinguish what happened in each of those
20 conversations. So I had some briefings in my office
21 within Parliament, as well as in the Department, because
22 on the day of the statement I was in Parliament a lot,
23 and so I had a little kind of cubbyhole type office
24 within Parliament, which was so small that the officials
25 couldn't all fit in and get a seat, so people were

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1 and then all of the different pages in order in one
2 folder that would then be given to me as my diary pack
3 that, as I went about my day, my job during the day,
4 I would take with me and be able to discard each note or
5 each meeting back to my private secretaries as those
6 meetings concluded.

7 And that would just mean that I would -- and it
8 would only come to me the night before, so it would be
9 part of my box, but it would mean that I had, you know,
10 some brief awareness of what was going to be in the
11 meetings. Sometimes, depending on the size of my box,
12 I wouldn't actually get a chance to really read the
13 diary pack in detail until the morning, maybe when I was
14 on my way into the Department but, normally, I would
15 have information about the different things in my diary.

16 **Q.** So focusing again on that word "mysterious", is it
17 surprising for you that your own team didn't provide you
18 with sufficient information before that meeting or is
19 your concern about the meeting itself?

20 **A.** Well, I mean, I think, now -- you know, within the
21 meeting it became clear that it was a serious issue and
22 they were being -- yeah, as I say, very serious about
23 it. I mean, I don't know whether it was -- what they
24 were happy to have committed to paper at that point,
25 whether officials knew -- I mean, I don't know exactly

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1 sitting on kind of printer tables and somebody was being
2 sitting on an upturned bin while I was being briefed on
3 that.

4 So I have a memory of these telephone calls and
5 briefing meetings but I don't necessarily distinguish
6 what happened in each one of them.

7 **Q.** The next paragraph says:

8 "I also recall that James Arbuthnot was identified
9 as a key MP coordinating Parliamentarians on the issue,
10 and I spoke with him about the issue on 3 July 2013.
11 Following that call I asked one of my officials, Will
12 Gibson, to follow up on various issues James had raised,
13 one of which was the suggestion that they should speak
14 with Second Sight on my behalf."

15 Just to clarify, what exactly is being said in that
16 final sentence there; is it that Will Gibson would
17 liaise with Second Sight or somebody else?

18 **A.** Yeah, I think it would be that Will Gibson would do that
19 and I think there is an email that was sent between Will
20 and possibly POL that -- around about that time, I think
21 to POL, following up on that issue. I don't know what
22 the outcome of that was.

23 **Q.** So you're not aware of whether they, in fact, met or
24 whether there was an attempt to meet them that was
25 rejected, or anything along those lines?

40

1 A. I don't know. I think it's possible that there was
 2 an attempt that was rejected but I haven't seen the
 3 documents to give me confidence on what the outcome was.
 4 I don't recall Will coming back to me with outcomes of
 5 that meeting but, equally, it's possible that they did
 6 meet and he used that as part of his information for
 7 when he was briefing me on matters.

8 Q. Thank you. The Second Sight Interim Report was produced
 9 on 8 July 2013. At paragraph 23, you've described the
 10 run-up to your ministerial statement being rushed or
 11 very rushed. Can you expand on that, please?

12 A. So obviously the Second Sight Report, if you see from
 13 the document trail, there were lots of emails going back
 14 and forth around Friday, 5 July and, indeed, over that
 15 weekend and, as explained before, I was not part of that
 16 email address. I was receiving my information from the
 17 Department in paper form, and so I will have gone up to
 18 the constituency as usual, with my box, on the Thursday
 19 night but a lot of things happened after that Thursday
 20 night box that I will then not have seen until I was
 21 back in the Department on the Monday and then many of
 22 those things would have been in the Monday night box.

23 It was a very busy time because I also, on that
 24 Tuesday when I made the statement, was doing two other
 25 debates in Parliament. So I was responding to a debate

1 debate pack. I can't be certain that I received the
 2 Second Sight Report, I might have done. I think it's
 3 likely that I probably did but I can't be as categorical
 4 about that and, as I say, it was in amongst a lot
 5 briefing notes -- briefing material that I was being
 6 given and it was -- you know, as a report goes, there
 7 was lines to take given but there was, you know, all of
 8 the stuff which has been since used *ad nauseam* by Post
 9 Office about there not being any systemic problems with
 10 the Horizon but, clearly, that was, for me, the first
 11 time I was reading that and therefore that seemed
 12 reassuring.

13 Q. Do you recall reading the actual report at that stage?

14 A. No, I will -- I'm certain I would not have had time to
 15 read the full report at that stage but I think it is
 16 entirely possible that I will have scanned through it.
 17 I have a memory of doing so, whether it was at that
 18 point or whether it was perhaps after the statement,
 19 I can't be certain. But my takeaway from scanning
 20 through it was, you know, there was quite a lot that was
 21 impenetrable but there was obviously the summary that
 22 I'd received which, you know, seemed to tally up from
 23 what I saw.

24 Q. Let's look at the summary. It's UKGI00001695. Let's
 25 start on 1.4, the summary is as follows:

1 about consumer protection issues relating to gift cards,
 2 people who had been -- lost money in that issue and then
 3 there was a one-and-a-half-hour debate that I had to
 4 respond to on zero hours contracts and employment
 5 protections.

6 So there was a lot going on and I was therefore
 7 receiving the information that had accumulated over the
 8 weekend in my box on that Monday night, alongside two
 9 other debate packs and, indeed, all of the rest of the
 10 correspondence and other submissions that were coming to
 11 me as well.

12 Q. Can we please look at UKGI00001693. It's a note from
 13 Peter Batten, who is within the Shareholder Executive,
 14 5 July 2013. He is emailing your private office and he
 15 says:

16 "Please see attached a short covering note setting
 17 out the key narrative and findings of the draft Second
 18 Sight Report, [the Post Office's] proposed next steps
 19 and handling for its release on Monday, and suggested
 20 lines to take. A scanned copy of the report ... is
 21 attached."

22 Would you have received both the briefing and the
 23 Second Sight Report at that stage?

24 A. On the Monday night in my box. I think I received --
 25 but I definitely will have received the briefing in that

1 "[Second Sight] report that as part of the
 2 investigation [Post Office] voluntarily admitted to
 3 having identified two 'anomalies' that affected 77
 4 branches (0.65% of the network) and 12 branches (0.12%
 5 of the network) respectively. The report notes that
 6 [Post Office] took action to rectify these anomalies
 7 once they had been identified.

8 "On the question of the core Horizon function,
 9 [Second Sight] finds that the system achieves its
 10 intended purpose and concludes that they have 'so far
 11 found no evidence of system wide (systemic) problems
 12 with the Horizon software'. Additionally, the report
 13 notes that the Horizon system, which involves over
 14 65,000 users 'operates smoothly for most subpostmasters
 15 and their staff' all of the time."

16 Were you aware at that stage that the finding
 17 regarding system-wide problems was only an interim
 18 finding?

19 A. I think I knew it was an Interim Report and that there
 20 was -- obviously, as transpired, there was further work
 21 that Second Sight were undertaking once the Working
 22 Group was set up.

23 Q. We then have at 1.6:

24 "With regard to the wider aspect of operation,
 25 [Second Sight] is more critical citing the large number

1 of interfaces with linked systems ... the complexity of
 2 some processes ... and the perceived lack of training.
 3 "Next steps
 4 "Though [the Post Office] see the [Second Sight]
 5 Interim Report as being unsatisfactory in many respects,
 6 their current thinking is to welcome the report and to
 7 commit to work with [Second Sight], [Justice for
 8 Subpostmasters Alliance], James Arbuthnot and other MPs
 9 in implementing those changes and improvements."
 10 If we scroll over the page, we have then suggested
 11 lines to take. The "Suggested lines to take" are as
 12 follows, the first is:

13 "It is not appropriate for the [Department for
 14 Business] to comment on the details of individual
 15 operational business issues for the Post Office such as
 16 those covered in this Interim Report.

17 "However, [the Department] welcomes the interim
 18 report's conclusion that there is no evidence of
 19 systemic problems with the Horizon [system]."

20 We see in that first bullet point there, again, the
 21 reference to an "operational matter". Now, this is
 22 an independent report that's been commissioned by the
 23 Post Office. We see there that it's being addressed by
 24 the Justice for Subpostmasters Alliance, James
 25 Arbuthnot, Members of Parliament; is it odd that it's

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1 to do differently. It did not, at this stage, strike me
 2 as, you know, some massive, wide issue across the Post
 3 Office.

4 **Q.** Looking at those suggested lines to take, on reflection,
 5 do you agree with those lines?

6 **A.** Well, I mean, having seen the details provided to me by
 7 the Inquiry, I am staggered that I made my statement to
 8 the House of Commons on 9 July and, on 15 July, Post
 9 Office Limited received the memo, the Clarke memo, that
 10 said that the credibility of their key witness was
 11 fatally undermined. I mean, this to me at the time
 12 seemed very reasonable.

13 I cannot quite square in my mind how it was possible
 14 for -- as a minister, you know, as the shareholder -- us
 15 to be responding, me to be responding on these issues,
 16 being given this briefing and then that, you know,
 17 bombshell. I mean, I'm not a lawyer but when I read
 18 that document in the briefing notes, I -- you know,
 19 I couldn't believe it. I don't think any -- you do not
 20 need to be a lawyer. How could anyone read that
 21 document and not realise that this is something which
 22 demands urgent attention and yet where did that go?

23 I mean, well, we know that Paula Vennells was aware
 24 that there was problems with an unsafe witness and she
 25 never told me.

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1 still described as an "operational matter" or that you
 2 can't comment on details of individual operational
 3 business issues?
 4 **A.** It didn't strike me as odd at the time. Clearly, it was
 5 a matter which I needed to understand to the extent that
 6 I was making a statement in the House to respond to the
 7 concerns being raised by MPs. But the nature of the
 8 report was going into quite a lot of detail about issues
 9 of training and helplines, which, yeah, did strike me as
 10 largely operational matters. It felt like the role that
 11 we would play, as, you know, myself and the civil
 12 servants within the business department who were
 13 obviously acting as the shareholder, was to, you know,
 14 have confidence that it was being dealt with properly,
 15 that the concerns being expressed by MPs were being
 16 addressed, and that's why that welcoming of that
 17 collaborative approach was certainly, from my
 18 perspective, very genuine, felt like the right thing to
 19 do, you know, in speaking with James Arbuthnot, who
 20 seemed not entirely happy but, you know, nonetheless
 21 very much in a spirit of goodwill to be able to work
 22 alongside Post Office.

23 I mean, that seemed to me like the best way to try
 24 to address this issue and that Post Office had
 25 recognised that there were some things that they needed

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1 **Q.** Let's stick now to the chain of events that's happening
 2 at this particular time and let's have a look at
 3 an email from Mr Whitehead on 8 July. That's
 4 UKGI00001748. If we could start on page 2. I'll just
 5 take you to a couple of documents and then we'll take
 6 have our first morning break.

7 If we look over the page, please. Mr Whitehead
 8 emails your private secretary:

9 "Following Jo's earlier telephone call with James
 10 Arbuthnot, suggested briefing for the Whips' Office:

11 "Briefing for the Whips on James Arbuthnot tabling
 12 an Urgent Question to obtain a Ministerial statement in
 13 response to independent review by forensic accountants
 14 ... of Post Office Limited's Horizon computer system
 15 which records all transactions conducted across the
 16 entire Post Office Network.

17 "The issues covered by the review relate to a very
 18 small number of ex-subpostmasters whose contracts were
 19 terminated and were subsequently convicted by the Courts
 20 for false accounting or, in more serious cases, theft
 21 and fraud."

22 Just pausing there, by this stage you are aware of
 23 the link to criminal prosecutions?

24 **A.** Yes, I was obviously aware of that in the briefing that
 25 I was receiving for preparing to give the statement in

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1 the House of Commons, which included also briefing on
2 the disclosure requirements that Post Office Limited had
3 to conform to as well. I don't think I had yet entirely
4 understood quite how exceptional the Post Office doing
5 their own prosecutions were, but I was aware that they
6 were prosecuting.

7 **Q.** Thank you. Then the next paragraph says:

8 "The report confirms that no systemic problems with
9 the Horizon system were found but also found scope for
10 Post Office Limited to improve aspects of its support
11 and training for subpostmasters."

12 If we scroll down towards the bottom of the page, it
13 says:

14 "[James Arbuthnot] is seeking to imply that the
15 Report suggests that new evidence might be found on the
16 basis of which some false accounting verdicts could be
17 challenged/appealed."

18 What was your understanding of that at that
19 particular stage?

20 **A.** I mean, very little. I mean, there was -- obviously
21 James Arbuthnot was keen to make sure that the case of
22 his constituent could be included in what would be
23 agreed in terms of going forward, the looking at the
24 issues, and, ultimately, there was agreement that those
25 cases would be included. So I wouldn't -- I wouldn't

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1 subpostmasters as Mr Arbuthnot appeared to suggest."

2 Was that a view that you had, that you shared?

3 **A.** So I think there's two different elements of that
4 sentence and I strongly agreed with one of those at the
5 time, and I think that's the one that really stuck in my
6 mind at the time, which was that it was not for
7 Government to intervene. And I appreciate this is not
8 an easy thing to hear but it was -- for those people
9 whose lives have been ruined -- but it was something
10 which I did feel very strongly when I stood up in the
11 House of Commons to make a statement that there is
12 a responsibility for there to be a separation between
13 the judicial process and the Government and it was
14 absolutely right for MPs to be advocating the case of
15 their constituents. It was the type of thing which, you
16 know, I would have done, for from my constituents too,
17 that was absolutely the right thing for them to be
18 doing.

19 But I felt, as a minister, I was in a different
20 position of responsibility, *vis à vis* the court process
21 and its independence, and that it would be very
22 dangerous territory to have a minister standing at the
23 despatch box in the House of Commons second-guessing or
24 throwing doubt on the decisions that the courts had
25 made.

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1 profess, you know, a strong, detailed understanding but
2 the issue that there were some subpostmasters that had
3 experienced convictions that also wanted to be involved
4 in challenging those was something which was brought my
5 attention in that note.

6 **Q.** There's then a further version of the briefing and that
7 can be found at UKGI00001749 and it looks as though the
8 briefing has been updated. We can see there, there's
9 still the reference on the third paragraph down that
10 "The report confirms that no systemic problems with the
11 Horizon system were found", but then if we scroll down
12 it says:

13 "During his conversation with Jo Swinson this
14 morning James Arbuthnot agreed that the report was
15 better than expected and acknowledged that it did not
16 point to any wide-scale problems with the Horizon
17 system.

18 "However he believes that the report provides
19 evidence that some of the convictions of subpostmasters
20 who plead guilty to false accounting were unsafe and he
21 would like the Government to intervene to offer some
22 form of redress or to reopen these verdicts.

23 "We would strongly reject the suggestion that it is
24 the role of either [the Post Office] or Government to
25 intervene to reopen the cases of individual

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1 In this -- looking at this sentence now, I can see
2 that the POL is also included in that and I think,
3 looking at this now, I wouldn't necessarily agree that
4 it was not the role of POL to intervene to reopen the
5 cases. I think that, clearly, the disclosure duty is
6 clear that, if evidence is found, then POL should be
7 proactively giving that information to anybody who has
8 been convicted and their defence teams. So I didn't
9 clock that at the time. I did strongly agree with the
10 advice that I was being given about ministers being
11 careful, and I -- that weighed on me quite strongly.

12 I recall in the statement that, you know, I wanted to be
13 constructive and helpful but there was a line that
14 I felt it was important that I didn't cross.

15 **MR BLAKE:** Thank you.

16 Sir, that might be an appropriate moment to take our
17 first morning break.

18 **SIR WYN WILLIAMS:** Yes, by all means, Mr Blake.

19 **MR BLAKE:** Can we come back at 11.10, please?

20 **SIR WYN WILLIAMS:** Fine.

21 (10.57 am)

(A short break)

22 (11.10 am)

23 **MR BLAKE:** Thank you, sir. Can you see and hear me?

24 **SIR WYN WILLIAMS:** Yes.

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1 **MR BLAKE:** Ms Swinson, I'd like to turn to your witness
 2 statement. I'm going to look at page 12, paragraph 25.
 3 It says:
 4 "The Inquiry has shown me an email chain between
 5 Paula Vennells and other [Post Office] executives dated
 6 6-8 July, in which Paula Vennells comments that: 'I have
 7 also spoken to Jo Swinson again today ... who remains
 8 supportive about our actions and relatively relaxed
 9 about the situation'. I cannot recall details of the
 10 specific conversation on this date and confidently
 11 distinguish it from others I had with Ms Vennells on
 12 these issues. I think it was a telephone call. On
 13 another occasion I recall Ms Vennells explaining to me
 14 in a tone of taking me into her confidence, with
 15 something of a pained expression, that while it was
 16 a sad situation, the reality was that some
 17 subpostmasters 'had their fingers in the till' or
 18 something to that effect. From the context of the
 19 concerns being raised by James Arbuthnot and other MPs
 20 I did recognise that there was a real need for [Post
 21 Office] to deal with and resolve the issues especially
 22 around training and support", et cetera.
 23 Now, it is very important for the Inquiry for you to
 24 be as specific as you can on this. What is your best
 25 recollection of precisely what was said?

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1 diary, I don't know exactly the date -- and that there
 2 was clearly telephone calls. It could have been in that
 3 June meeting, I would have been asking questions about
 4 this, you know, querying it because, of course, MPs are
 5 raising concerns on behalf of their constituents, and so
 6 this was Paula Vennells saying to me that, yeah,
 7 basically just some of these subpostmasters are guilty.
 8 **Q.** What role did that have in the thinking that you had at
 9 that time?
 10 **A.** At that time, the related context is around the numbers
 11 that I was being told, so -- and all of the briefings
 12 were about the millions of transactions, the -- you
 13 know, not just the 11,500 branch subpostmasters but also
 14 all of their staff, so the tens of thousands of Horizon
 15 users, and that this is a minuscule, tiny proportion
 16 and, of course, the figures I was being told of how many
 17 cases at that point, you know, there was, I think, 14 in
 18 the one of the briefings around this point. I think
 19 later on, even in 2015, when I asked about which
 20 criminal cases remained that would not then be mediated,
 21 it was 37.

22 So those numbers were, you know, a smallish
 23 proportion of a very large number and it didn't seem to
 24 me to be impossible that there would be some fraud
 25 within the Post Office but I would have thought it would

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1 **A.** Just to be clear, are you asking about the telephone
 2 call that Paula Vennells is commenting on or the second
 3 element that was a different occasion?
 4 **Q.** The second --
 5 **A.** I'll be really straightforward, I'm not going to be able
 6 to give you the exact words that Paula used, it was more
 7 than a decade ago and so what remains in my memory is
 8 the impression that it made, not exactly the words that
 9 she said.
 10 But what she was trying to clearly reassure -- well,
 11 reassure me, but explain to me, was sort of saying that,
 12 you know, although -- and as say, these are not words,
 13 these are my impression of what she was saying -- that,
 14 although these might seem to be lovely people, clearly
 15 some of them are actually just at it, is what she was
 16 trying to convey. And it was, as I say, that tone of
 17 "We have looked into this and, you know, it is very sad
 18 but that is just the reality, and so we have to act".
 19 So that's what I recall from that, as I say, with the
 20 caveat that I don't know the exact words.
 21 **Q.** Can you assist us with the timing: is it in a similar
 22 period to 6 to 8 July?
 23 **A.** I'm pretty sure it will have been because this was
 24 a point where I had the briefing meeting in June,
 25 I think, June at some point -- without access to the

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1 have been a small amount and that the numbers that were
 2 being given to me seemed to be small amounts.
 3 I did ask for specific statistics. I think this was
 4 in response to reading the briefing pack because, having
 5 seen the emails that my private office sent on the
 6 morning of the statement of 9 July, I think I asked for,
 7 you know, a breakdown of how many of the subpostmasters
 8 had been convicted of fraud or theft or false
 9 accounting, how many cases had actually gone to court
 10 and the subpostmaster been found not guilty.

11 I asked for that breakdown as was detailed in that
 12 email but I don't think it was actually provided. And,
 13 I have to say, one of the things that I regret is that
 14 I didn't specifically chase that. I mean, the context
 15 of, you know, the number of questions I would ask in any
 16 individual ministerial box, we'd be talking dozens
 17 because, on each submission, I might be making four or
 18 five questions so, you know, I do recall early on with
 19 my private office sort of saying to them, you know,
 20 probably in September or October, "Look I keep asking
 21 you all these questions and responding to things, how
 22 are we keeping track of this? Am I supposed to, you
 23 know, keep a note of what I've asked?" And I remember
 24 my Private Secretary, Head of Private Office, Emily,
 25 saying to me, "Look, you just have to trust us that we

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1 follow these things up, that's our job, and you can't
2 possibly know all of it".

3 So, I do --

4 **Q.** I'll take you --

5 **A.** -- think I asked for that data, which probably would
6 have been quite instructive to help me understand the
7 context of the balance of the numbers.

8 **Q.** I'll take you to that email correspondence shortly.

9 Could we, before we get to that, please, turn to
10 FUJ00174749. This is an internal Fujitsu email, so it's
11 not a document or email you will have seen at the time,
12 but it refers to a meeting you had and I'd just like to
13 see if you recall anything from that. It's FUJ00174749.

14 We can see at the bottom half of that page, please,
15 it's an email within Fujitsu and it's referring to
16 a conversation with Paula Vennells:

17 "A very good conversation -- headlines are:

18 "Paula is very appreciative of our support (and
19 recognises how much we have been supporting them).

20 "[The Post Office Account] have made a choice not to
21 engage publicly in response to the story as it hasn't
22 taken off that much.

23 "Paula described herself as being 'mildly troubled'
24 by it -- which is a change from this being a top
25 priority a week ago.

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1 answer. So the way Parliament works, which as I explain
2 in my statement was not necessarily well understood,
3 even by the BIS Parliamentary Office, let alone by --
4 I think you said this was an email from Fujitsu.

5 If James Arbuthnot wanted to raise a question in
6 Parliament as an urgent question, that would be up to
7 the speaker to decide whether or not that should be
8 an urgent question and that would be answered in person
9 at the despatch box and the only choice the Government
10 would have would be whether to answer it as an urgent
11 question or potentially, which is what we did, was to
12 pre-empt that by making a ministerial statement, which
13 in many ways is a bit more respectful to the issue
14 because it is the Government coming forward and also
15 actually was easier from logistical perspective when
16 I had three debates that day, to do, to have some degree
17 more of control about the timing because, obviously, not
18 turning up for the debate on zero hours contracts would
19 also have been disrespectful to Parliament.

20 So that needed to be managed. So yeah, it always
21 needed to be answered in person and this was just the
22 difference about whether we would wait for James
23 Arbuthnot to lay an urgent question or whether we would
24 make a ministerial statement.

25 **Q.** In respect of the second part, "Lesley has been over

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1 "[Post Office Account] are now looking at what they
2 need to do in response to the report eg increase
3 postmaster training -- this is a work in progress for
4 them."

5 Then it's this paragraph:

6 "A question is going to be asked in Parliament about
7 the report. Jo Swinson has chosen to answer it
8 personally rather than have a written answer (because
9 she believes she can kill it more easily by being there
10 in person). Lesley has been over at Parliament this
11 morning briefing Jo (not sure if Paula was also there)."

12 I'm going to break that final one down into two: the
13 first is the reference to you being able to kill it more
14 easily by being there in person.

15 **A.** Mr Blake, you showed me this for the first time this
16 morning and we had a discussion about whether the word
17 I used on seeing this was appropriate to repeat in the
18 Inquiry. Let's just say this is rubbish because that's
19 probably more appropriate language for the Inquiry
20 transcript.

21 I mean, it's -- that was not the case. I mean, it's
22 wrong on various levels. I mean, the most important
23 being that this was not about "killing it" but also it
24 just is -- it just doesn't actually make sense because
25 it wasn't my choice ever to be able to give a written

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1 Parliament this morning briefing Jo (not sure if Paula
2 was there)", do you recall meeting Lesley Sewell at
3 Parliament?

4 **A.** Ooh. I know there were various officials there.

5 I mean, I mentioned my small Parliamentary office and it
6 was a bit cramped but it was a small office, there was
7 probably at least five or six different people in there.
8 I would have known in particular who the ones were from
9 the ShEx team, who I was familiar with from being
10 briefed by them regularly. It's entirely feasible and,
11 indeed probably likely, that there were one or two
12 people from POL there, in terms of giving me information
13 to make sure that any questions that I was asking in
14 advance of the statement -- to make sure that I knew
15 what answers to give because I knew that I would be
16 asked lots of questions by MPs at that point. Clearly
17 having a to and fro to Post Office where we had to send
18 emails was not going to work with the urgency of the
19 situation.

20 **Q.** Do you recall if Paula Vennells was there?

21 **A.** I'm pretty sure she wasn't there that day. I do recall
22 speaking to her on the telephone and so, yeah, I mean
23 I probably couldn't be 100 per cent on that but I would
24 be 95 per cent sure she wasn't there on that day.

25 **Q.** We have an email from Paula Vennells about what occurred

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1 on that day. Can we please have a look at that, that's
2 POL00099156. That's the top email, an internal email
3 but she says as follows:

4 "I will also send over a summary of Jo Swinson's
5 statement in the [House of Commons]. She was good and
6 fielded difficult questions well for us."

7 Now, at that stage, did you consider it your job to
8 be fielding questions on behalf of the Post Office?

9 **A.** When those questions were being posed in Parliament,
10 yes, because there was no alternative. Paula Vennells
11 could not stand up at the despatch box in the House of
12 Commons so any questions about the Post Office would
13 need to be fielded by me, in the same way if there were
14 questions about the Competition and Markets Authority or
15 the Equality and Human Rights Commission, or any of
16 these other bodies that fell within my portfolio;
17 Parliamentary Questions needed to be responded to by
18 a minister.

19 **Q.** Can we now turn to UKGI00001852. This is the email
20 I think you were referring to earlier. If we turn to
21 page 2, we see at the bottom of page 2, we see an email
22 from Peter Batten at ShEx to Rodric Williams at the Post
23 Office and that's on 9 July at 9.39 in the morning:

24 "I left a voicemail about the Second Sight Report.
25 We are likely to have to make a statement to Parliament

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1 either of you on this? (I know POL often drop me off
2 their copy lists -- I try not to take it personally)."

3 If we scroll up the page, a response from
4 Mr Whitehead says:

5 "Sadly they have a habit of dropping everybody off
6 when we seek 'awkward' data. I have not seen anything
7 and my guess is that without a chaser, they'll
8 unilaterally decide we don't need it!"

9 Can you explain your understanding, at that
10 particular time, of difficulties getting information
11 from the Post Office?

12 **A.** It's not something I was aware of. This issue that Mike
13 is expressing in the email, which I think does speak
14 volumes, given what we know now, was not something that
15 was brought my attention at the time and, as I said,
16 I did rely on my private office and my officials to
17 chase the many questions that I asked. But I, you know,
18 do think this is pretty shocking and I think it's -- on
19 two levels. I mean, just on one level that I was
20 answering questions in Parliament and needed information
21 and, you know, needed it to be able to give good answers
22 to the people who were asking me questions, you know,
23 who, let's remember, are speaking there on behalf of
24 their constituents who have been affected by these
25 issues, right?

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1 this lunch time. Jo Swinson's office has urgently
2 requested information about the number of convictions.
3 Will spoke to you at the end of the meeting on Friday
4 about this, and it would be great if you could send over
5 your findings as soon as possible."

6 If we then scroll up on the page, it sets out the
7 information that you were requesting:

8 "How many of the [subpostmasters] have had their
9 contracts terminated?

10 "How many of the [subpostmasters] were convicted of
11 respectively fraud, theft and false accounting?

12 "In each category, how many of those convicted pled
13 [sic] guilty?"

14 "How many (if any) were prosecuted but found not
15 guilty?"

16 If we scroll over the page to page 1, Susan Crichton
17 responds internally and says, "On to it", or in fact
18 still to the same chain. She responds to Will Gibson
19 and says:

20 "Will -- we are working on this, will get it through
21 to you [as soon as possible]."

22 That's 9 July. We're now at 10.36.

23 There's then an email on 16 July, so a considerable
24 time after, from Peter Batten at ShEx, and he says:

25 "Did Susan, Rodric or Martin ever come back to

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1 So that, you know, that has an importance attached
2 to it. So if I'm asking for that information, it should
3 be provided in a timely way and it certainly shouldn't
4 be something that needs to be chased.

5 But then it's also problematic because, if this is
6 the experience that ShEx are having, that, I think,
7 points to potential deeper problems with what Post
8 Office is willing to provide and that would raise some
9 alarm bells, but it's not something that was raised with
10 me at the time.

11 **Q.** In terms of timing, 8 August was then the first meeting
12 of the Working Group and I'd like now to take you to
13 September. Can we look at POL00196410. Could we please
14 turn to page 4. There's an email, if we scroll down,
15 from Alan Bates, to a number of people: Paula Vennells,
16 Susan Crichton, Angela van den Bogerd. You were copied
17 in, "swinsonmpstcorrespondence", is that your
18 constituency email account?

19 **A.** No, "mpstcorrespondence" -- so like the "Swinson MPST"
20 address was my private office, this would be the
21 correspondence office for my portfolio?

22 **Q.** Thank you. This is the correspondence that the Inquiry
23 has seen number of times regarding Mr Griffiths:

24 "This afternoon I received the following email, it
25 is a prime example of the thuggery being exerted on the

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1 defenceless subpostmasters."

2 If we scroll up we can see on page 3, at the bottom
3 of page 3, Stephen Mosley MP says that he will forward
4 it to you. If we keep on scrolling up, Mr Bates
5 responds, and he says:

6 "I did send a copy of my email to Jo Swinson who
7 I have been in contact with over subpostmaster issues
8 since she was appointed. I have also met with her two
9 predecessors ..."

10 Then if we go to page 1, we have Mr Mosely's letter
11 to you, which says:

12 "Dear Jo

13 "Please find attached a copy of correspondence
14 recently received from Mr Alan Bates ... regarding his
15 concerns relating to the suicide attempt of my
16 constituent Mr Martin Griffiths, subpostmaster ..."

17 I think you said in your statement you don't recall
18 seeing this correspondence; is that correct?

19 **A.** I don't recall seeing it and I'm very sorry about that
20 and it's clearly describing incredibly tragic events.

21 **Q.** Who would have been responsible for bringing this to
22 your attention?

23 **A.** Well, in the normal course of events, correspondence
24 would come to me through the correspondence office in my
25 stack of nightly correspondence, and so that would be

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1 **A.** No, not to my knowledge. I suppose it's possible
2 I could have been introduced to him just as I was
3 leaving if it had already been confirmed that he was
4 taking over from Will but I think it's unlikely.

5 **Q.** Can we turn to UKGI00042677. This a Shareholder
6 Executive presentation from February 2014, so you would
7 have been on maternity leave at the time of this
8 presentation. It's a presentation the Inquiry has seen
9 before. If we could turn to page 6, please. It says,
10 on the left-hand side:

11 "There is a general feeling that Paula is not the
12 optimal person to lead [the Post Office] to deliver its
13 commercial strategy.

14 "Paula has not been able to establish good working
15 relationships with Jo Swinson.

16 "She has been unable to retain key staff."

17 Just pausing there, was that an accurate reflection
18 of your relationship?

19 **A.** I don't think it was. I'm not going to say there were
20 never any frustrations with the Post Office. I, you
21 know, was asking for more information on the speed of
22 Network Transformation to make sure that the future of
23 the network would be secure but, you know, I engaged
24 with Paula regularly and I felt we did have quite a good
25 working relationship, so I don't really know where that

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1 the normal way in which correspondence would make its
2 way to me. In some cases -- I think this is one that
3 would certainly qualify -- there would be an argument
4 for raising it maybe in a submission and bringing it to
5 my attention in a way that was more significant than one
6 letter among many in correspondence.

7 **Q.** So is it your evidence it's likely that you would have
8 received it in a pack because it's correspondence from
9 a fellow Parliamentarian --

10 **A.** I mean --

11 **Q.** -- or you don't recall?

12 **A.** I think that is likely but I do not recall it and, of
13 course, the content is such that I think I -- you know,
14 I mean, my instinct is that it's the kind of thing that
15 you would recall. But I'm sorry, I can't give any more
16 detail than that because I don't have a memory of
17 receiving it.

18 **Q.** Thank you. That can come down. Thank you. Now, in
19 terms of timing, 18 December 2013 to 30 June 2014 was
20 your period of maternity leave. As we discussed
21 earlier, in the meantime Mr Callard became the Head of
22 the Post Office Shareholder Team in January 2014 and he
23 became the Non-Executive Director on the Post Office
24 Board in March 2014. Had you met Mr Callard at all
25 before your maternity leave?

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1 particular sentence has come from, and it was a big
2 surprise to me when I saw it come forward in the pack
3 and, indeed, when it was, I think, put to Alice Perkins.

4 **Q.** "Performance as CEO and deliver of strategy plan:

5 "[Post Office] failed to deliver its 2010 strategic
6 plan ... She has shown a worrying lack of knowledge
7 about the detail of the new plan.

8 "Paula's people management has caused concern as she
9 appears unable to work with personalities and
10 approximate that differ from hers, and has failed to
11 build relationships with key Directors.

12 "Paula's performance as CEO has been questioned by
13 the [Post Office] Chair and by members of the Board.

14 "Engagement with Ministers and stakeholders

15 "Paula has not developed strong relationships with
16 stakeholders. The scale of change envisaged under the
17 strategic plan requires a visible, dynamic and
18 charismatic leader able to re-engage and energise the
19 relationship with stakeholders.

20 "This includes engaging with BIS Ministers. Over
21 the past year, Paula has repeatedly overpromised and
22 underdelivered."

23 You said in your statement that this wasn't
24 something you were aware of?

25 **A.** No, I mean, this is quite a shocking document to see,

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1 right? When you talk about what might be operational
2 matters and what might be strategic matters, I recognise
3 and I know this Inquiry has interrogated that
4 distinction, and sometimes there might be a degree of
5 grey area, whether something is operational or
6 strategic.

7 But "Is the Chief Executive fit to do the job?"
8 Really, pretty clearly, strategic, right? Right up
9 there with something that is strategic. And, therefore,
10 I just can't understand how, you know, the Department of
11 which I was a minister, has a slide deck which is
12 talking about the removal of the Chief Executive of Post
13 Office Limited without actually talking to ministers
14 about that. I mean, it just stuns me that that can be
15 happening.

16 I appreciate, you know, as I think Richard Callard
17 said later, there's an issue about at what stage you
18 might raise concerns with ministers and it probably
19 wouldn't be the first time you had an inkling that there
20 might be an issue but, at the point at which you're
21 creating a whole, like, PowerPoint deck about it,
22 clearly the time has come that ministers need to be
23 engaged in this discussion and I would argue not
24 actually just the person who was in my role as the
25 Parliamentary Under-Secretary of State, but this is

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1 "We are starting to brief Jo more regularly on some
2 of the developments since her maternity leave. We will
3 begin this in May through catch-ups between Jo and
4 Jenny, as well as with private office.

5 "We then propose to do some high level one-hour
6 briefing sessions between Jo and each of her main
7 directorates in early June", one of those being Post
8 Office.

9 If we scroll up, please, there's an email from
10 Mr Callard to Peter Batten. He says as follows:

11 "See below, please can you start putting some
12 thought into this. Clearly we will have our priorities
13 to discuss, but you will have a better idea of what her
14 priorities might be than I will, as we will have to
15 address those as well. We might want to also think
16 about how many sessions we might need -- eg I want to
17 get her in the right place on Sparrow!"

18 Looking back at those early briefings, what do you
19 understand that to have meant? I know it's not you
20 that's writing it but if you reflect on the briefing
21 that you did ultimately receive.

22 A. I mean, I think the contrast is very illustrative here.
23 So we've got an email where Richard Callard is saying,
24 "I want to get her in the right place on Sparrow" -- and
25 I didn't know what Sparrow was but obviously do now --

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1 something that which, at the Secretary of State level,
2 should have been discussed.

3 So I'm pretty shocked and obviously I was on
4 maternity leave, so I wouldn't have expected personally
5 to know this at this point and, just for context, about
6 November '13, a few weeks before I went off on maternity
7 leave, I received a submission about Paula Vennells'
8 remuneration, advising me that "We wish to retain her as
9 a Director and we don't think any downward pressure on
10 pay is appropriate at this point".

11 So just a matter of weeks after that, we've got to
12 this situation. I think that feels very strange and,
13 although I wouldn't have expected to know about this at
14 the time because I was on maternity leave, Jenny
15 Willott, who was covering for me, should have been
16 appraised, as should Vince Cable.

17 Q. Let's move on to when you're going to be returning. Can
18 we please look at UKGI00002288, please. If we look at
19 the bottom email:

20 "An update on some plans in train to support Jo
21 Swinson's return from maternity leave. We expect Jo to
22 return to BIS/GEO around the end of June -- but will
23 confirm this once definitive. Jenny will continue as
24 Minister, taking all decisions, until Jo's return.

25 "Briefing Jo

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1 and, if you contrast that with the note that I actually
2 received when coming back from maternity leave about
3 Post Office Limited, there is, I think, one sentence on
4 Horizon, which is incredibly bland. It is buried in
5 a paragraph called "Exceptional items", it isn't even
6 highlighted as a risk, and it basically says that "The
7 Working Group is set up, progress is a bit slower than
8 we would have hope and Post Office is seeking assurance
9 on its position".

10 And, you know, that's a very kind of 'nothing to see
11 here' sort of sentence and so I just think that's
12 a really interesting contrast, right? You know, that he
13 was not actually giving me information about what was
14 happening in Sparrow, and we know he wasn't because now
15 when we look at the minutes of the Sparrow meetings,
16 it's actually the opposite of what I was being told.

17 So the Sparrow meetings were talking about reducing
18 the role of Second Sight, which was never mentioned to
19 me, even in the final conversations that we had nearly
20 a year later, "What about the closure of the Working
21 Group", right? It was never mentioned in any of the
22 subsequent points when, you know, knowing that Second
23 Sight were important to me, when I came back from
24 maternity leave, when I was asking questions about
25 Horizon in September, when I was preparing for the

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1 Westminster Hall debate.

2 I mean, if a civil servant knew that Second Sight's
3 investigation was important to me and that Post Office
4 were thinking of reducing their role, I mean that's
5 something he should have been warning me about that was
6 a problem, rather than hiding from me. And then we had
7 what they were planning to do with the Working Group.
8 Again, looking at the Sparrow minutes from that time,
9 around about this April 2014 period, where they were
10 basically saying that they were going to reinterpret how
11 they engaged with the Mediation Scheme within that
12 existing terms of reference and I mean, in a sense, when
13 you see that, it's no wonder that trust broke down and
14 that that all ground to a halt later that year. But
15 when that trust was breaking down, I was being briefed
16 by them, that this was because other people were trying
17 to extend the scope of the scheme.

18 I mean, it's Orwellian, frankly. They were saying
19 themselves that they were basically going to change the
20 way they engaged with the scheme and then told me that
21 other people were reinterpreting it or extending the
22 scope. So, I mean, to me, I just cannot understand how
23 a civil servant could operate in that way and I just
24 want to say, because I obviously have in my witness
25 statement been critical of Richard Callard, it is

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1 general gist of our arguments.

2 "If you do have a word with Jo prior to the meeting
3 I would be grateful for any readout if you get chance."

4 So this seems to be a document that has been seen by
5 Alice Perkins at the Post Office, and it's not
6 a speaking note but it is some thoughts. We'll come and
7 look at the content but what is your general view of the
8 appropriateness of that being sent to your private
9 office for their comments before being seen or being
10 discussed with you?

11 A. So just to put this in context, this is about the issue
12 of the remuneration of a potential new Chief Finance
13 Officer and an amount of money that then would need to
14 be paid to the existing Chief Finance Officer to
15 encourage his exit.

16 And I referred just now to a submission that
17 I received in November 2013 which said we wish to retain
18 Paula Vennells, it also said we wish to retain Chris Day
19 as the Chief Finance Officer and we don't want any
20 downward pressure on their remuneration at this time
21 because they are both in place, and doing well.

22 That was just before I went on maternity leave and
23 then literally days after I returned from maternity
24 leave, having had the kind of briefing meetings where
25 I was brought back up to speed and no concerns raised

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1 totally not the experience that I had dealing with
2 dozens of civil servants across so many different areas
3 of my brief.

4 My general experience of dealing with civil servants
5 was that they were diligent, they were thoughtful, they
6 were respectful of Parliament, they cared about the
7 issues and how they affected members of the public --

8 Q. Dealing with this particular individual --

9 A. -- and this was totally contrary to that.

10 Q. Thank you. Could we please turn to UKGI00002439,
11 please. We're now in August 2014. Six months have
12 passed since that presentation regarding the performance
13 of Ms Vennells. It's an email from Mr Callard to your
14 private office. He says:

15 "Claire

16 "Thanks for the discussion today -- very helpful.

17 I have attached the notes that I mentioned -- Alice saw
18 the first iteration, I have just sent this second
19 iteration to her and thought it might be expedient that
20 you see it sooner rather than later. I would be
21 grateful if you could flag any potential 'red rags' in
22 here.

23 "Just to be clear, this is not a speaking note as
24 such, it's too long for that. It's something just to
25 get thoughts in some sort of order but it gives you the

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1 about the performance of the senior executives of the
2 Post Office, beyond a note in the briefing that said
3 they'd made some changes around HR, and so on, I then
4 received this note that says, "We would like you to
5 write to Danny Alexander to ask for exceptional
6 permission to appoint a new Chief Finance Officer for
7 Post Office Limited", on a salary which was more than
8 £500, and also to spend hundreds of thousands of pounds
9 on an exit payment for the existing Chief Finance
10 Officer, to which I, perhaps quite understandably, was
11 rather shocked because I'd never heard of a suggestion
12 that we needed to replace the Chief Finance Officer and
13 thought that would have been something that I perhaps
14 should have known about if that was the case, before the
15 point at which they were asking me to approach Danny
16 Alexander, who was the Chief Secretary of the Treasury,
17 for permission.

18 And the permission would have been needed because
19 the sums involved were of a level that needed approval
20 because they were exceptional in terms of the levels of
21 pay and, in the context, of course, at the time, we're
22 in incredibly difficult financial circumstances, the
23 Government making all sorts of really heartrending
24 decisions about budgets.

25 So my instinct was, you know, if I'm going to ask

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1 Danny Alexander for money it's probably not going to be
 2 for hundreds of thousands of pounds for Post Office
 3 Executives, when you've just told me the current Chief
 4 Finance Officer is doing a perfectly good job.

5 **Q.** If I could just pause you there, we're both going to get
 6 in trouble with the Stenographer?

7 **A.** Okay.

8 **Q.** Can I ask you to ideally keep your answers relatively
 9 short and relatively slow, if possible.

10 **A.** Okay, so that was the context and I then had some back
 11 and forth, when I responded to that submission, and
 12 I said no, I'm not happy to send this letter to Danny
 13 Alexander, and there was pushback and I think there were
 14 some meetings with officials, I think that this was in
 15 advance of a call that Alice Perkins was planning to
 16 have with me that Friday.

17 **Q.** Shall we look at the document itself?

18 **A.** Yes.

19 **Q.** Let's look at it, UKGI00002440. So this is the
 20 attachment to the email. I think your evidence is that
 21 you didn't see this attachment?

22 **A.** No.

23 **Q.** It in fact wasn't intended to be seen by you, it was
 24 your understanding?

25 **A.** That's right and, indeed, they were asking my private

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1 has been growing for some time, and has only recently
 2 got to the point where it feels it needs to act in due
 3 course.

4 "But this leaves the Board in a difficult place --
 5 removing a CEO without a confident CFO capable of
 6 holding the fort is a big risk. This makes replacing
 7 the CFO all the more important, which explains the
 8 Board's heightened concern and why Alice wants to talk
 9 to you and Vince in person."

10 So very briefly, just to summarise, the proposal is
 11 a new CFO because we want to replace the CEO and we
 12 can't do that until we have a good CFO in place; is that
 13 correct?

14 **A.** Yes, and that -- I mean, that is not what I was told but
 15 that's what this note is arguing and this is clearly
 16 after a period of time where they have done a full
 17 recruitment process. So this is clearly at the end of
 18 probably at least two to three months of them taking
 19 action on this in terms of recruiting headhunters to be
 20 able to search the field, conducting interviews, going
 21 through all of those steps while not briefing me on it
 22 and, even then, not telling me that they had these
 23 concerns about the Chief Executive.

24 **Q.** I mean, if you scroll down, he seems to posit
 25 a question:

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1 office to sort of give them a bit of intelligence about
 2 whether this would be a "red rag", presumably meaning to
 3 a bull. And, you know -- I mean, given that it was the
 4 Government's policy to have pay restraint in difficult
 5 financial circumstances, you know, reading this now, you
 6 know, it's very shocking that, you know, that this is
 7 what they were trying to do.

8 And, indeed, that they hadn't been straightforward
 9 in the note that they clearly sent me in July about why
 10 they wanted a new Chief Finance Officer.

11 **Q.** So let's have a read. It says:

12 "As you know, ShEx and the Board *are clear* the
 13 current CFO is not the right person to take the company
 14 forward given the challenges it faces."

15 If we skip down, it says:

16 "You know all that and on reflection we should have
 17 approached you earlier. However, we want to explain to
 18 you why we need to come and see you on this, and why
 19 Alice and the chair of the RemCo want to meet you and
 20 Vince.

21 "The difficulties on the CFO front have brought
 22 forward the concerns the Board (and ShEx) has about the
 23 CEO, which you need to be aware of, and which puts the
 24 appointment of a new CFO in a wider context.

25 "The Board's concern over the performance of the CEO

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1 "Why haven't you told me about the CEO before? Why
 2 didn't it form part of the CFO advice?"

3 The bullet points there say:

4 "Removing the CEO is a very dangerous and
 5 destabilising thing to do -- it's not something the
 6 Board takes lightly so it needed to be certain before
 7 coming to you.

8 "We are also conscious that the moment we tell you
 9 about Paula, your relationship with her is irrevocably
 10 changed.

11 "The Board has been monitoring the situation for
 12 some time but until recently have felt that the balance
 13 of risk pointed towards keeping Paula in place, given
 14 the uncertainty and difficulty of appointing a successor
 15 ...

16 "There are a number of reasons why this balance has
 17 now changed:

18 "Efforts to improve her performance have failed.
 19 "The Board is increasingly frustrate with the lack
 20 of progress ..."

21 Reference there to specific business areas like
 22 Horizon and the strategy in general:

23 "This crystallised for the Board at the June away
 24 day, where Paula very much sat back and let her team
 25 lead -- she acts more like a [Non-Executive Director]

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1 than someone who leads from the front."
 2 If we go over the page, please. There's a section
 3 there on "What is wrong with the CEO?", and we see
 4 there, for example:

5 "Issues like the Horizon Mediation Scheme and
 6 Financial Services have required significantly more
 7 oversight by the Board than one might expect as things
 8 haven't been gripped ..."

9 Then there's a section on why a new CEO would
 10 require higher remuneration and then, "What have you
 11 done to put measures in place to improve her
 12 performance?":

13 "Alice has spent an enormous amount of time
 14 coaching, mentoring and monitoring Paula.

15 "Important to note that Alice has significant
 16 [Non-Executive Director] experience ... huge amount of
 17 experience in knowing what can and can't be done with
 18 both Paula and Chris.

19 "Paula responded to initial efforts to improve
 20 performance ... but this has levelled off and is
 21 ultimately about character and aptitude."

22 Mr Callard's evidence to this Inquiry was that he
 23 probably presented his case to you in accordance with
 24 this note; is that your recollection?

25 A. Absolutely not, and it's something which I think I would
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1 letter to the Treasury. So I don't know the chronology
 2 of what conversations were then had with Vince.
 3 Q. Can we please then turn to UKGI00002472. We're moving
 4 on a few weeks later now and this is a briefing for you
 5 on Second Sight's thematic report, which has been
 6 leaked.

7 I'll just read to you a few paragraphs from that:

8 "A report leaked yesterday is critical of [Post
 9 Office's] Horizon accounting system ..."

10 In italics below that it says:

11 "It is important to stress that despite a year's
 12 worth of investigation [the Post Office] and independent
 13 investigators Second Sight, no systemic or technical
 14 deficiencies have been found with the Horizon system."

15 If we scroll down, the same form of words is in bold
 16 there, and it says:

17 "... and the flavour of the report reflects [the
 18 Post Office's] general concern that Second Sight has not
 19 been as objective or forensic as they might otherwise
 20 have been given their role."

21 It sets out "Further detail":

22 "The Mediation Scheme has been a significant concern
 23 to [the Post Office] for some time. Whilst no
 24 substantial issues with the Horizon system have been
 25 found, their concerns include the following:
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1 have recalled because one point I would agree with from
 2 that to note is that it's the kind of information that
 3 would irrevocably change my relationship with Paula, and
 4 the way in which I interpreted what she was telling me
 5 and the assurances that she was giving me, and that, you
 6 know, I obviously did engage with Paula on a regular
 7 basis, and the assurances that she gave me, you know,
 8 personal assurances, as well as in writing, on Horizon
 9 actually were very important.

10 They were not received with the knowledge that she
 11 was somebody who lacked "grip and pace" on the issue of
 12 Horizon and, I mean, if this was the view of the BIS
 13 civil servants, I mean, arguably probably fairly, given
 14 what we now know, then it also I think raises questions
 15 about how they were probing the information that they
 16 were getting from Post Office Limited about Horizon in
 17 general terms, if they felt that that had not been
 18 properly gripped.

19 But this -- these concerns were not put to me.
 20 I mean, I don't know exactly the chronology of what
 21 happened. There were -- I do recall having a meeting
 22 but I think it may have been in July shortly after the
 23 submission. Ultimately, I was not happy to approve the
 24 extra money but I do know that it went to the Secretary
 25 of State, Vince Cable, who ultimately did write the
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1 "They consider that independent investigators Second
 2 Sight have 'gone native' and are unduly taking the side
 3 of JFSA. This is supported by the fact that [Second
 4 Sight] have admitted privately that they find it
 5 emotionally difficult to opine against [subpostmasters],
 6 regardless of the circumstances ...

7 "[Second] Claims in the thematic report (and the
 8 individual reports on each case prepared by [Second
 9 Sight]) have generally been unsubstantiated. For
 10 example, [Second Sight] claim that power loss can lead
 11 to data loss for the [subpostmaster], creating
 12 discrepancies between cash accounted for in Horizon and
 13 cash in the safe or till. There is no evidence to
 14 support these claims.

15 "[Second Sight] do not sufficiently acknowledge that
 16 the relationship between [Post Office] and
 17 [subpostmaster] is one of principal and subcontractor
 18 ..."

19 In the final bullet point on that page:

20 "A number of the reports written by [Second Sight]
 21 in relation to individual cases have been rejected by
 22 Tony Hooper, on the basis that the claims are
 23 unsubstantiated. In such cases he has tasked [Second
 24 Sight] with rewriting the report. It is not clear why
 25 he has not treated this report similarly."
 84

1 If we go over the page, please.
 2 "[Justice for Subpostmasters Alliance] has had
 3 difficulty in accepting that some cases will not warrant
 4 mediation, because the SPM was clearly at fault or was
 5 victim of fraud by their own staff.
 6 "Second Sight has continued to widen the scope of
 7 the investigation rather than focus on the Horizon
 8 system, prolonging the investigations and increasing
 9 costs ...
 10 "Meanwhile, whilst the Mediation Scheme continues,
 11 expectations around possible compensation have grown to
 12 potentially unrealistic levels."
 13 We will see that this was sent by Mr Callard.
 14 Perhaps we could turn to UKGI00007352, and if we start
 15 on page 2. This was from your private office to
 16 Mr Callard, and it says:
 17 "The minister was grateful for this briefing and
 18 commented that she found it very useful. I would like
 19 to add my thanks for the quick turnaround!
 20 "She had one question with regards to the following
 21 paragraph: 'A number of the reports written by [Second
 22 Sight] in relation to individual cases have been
 23 rejected by Tony Hooper ..."
 24 That's the passage I just took you to:
 25 "She'd like to know if we can ask him for more
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1 reports. I'd previously been told that Second Sight's
 2 Report's quality had been questioned by Sir Anthony
 3 Hooper and, clearly, I think that was intended to reduce
 4 my view of Second Sight's credibility. But I obviously
 5 was picking up on the fact that he hadn't made any kind
 6 of rejection of this report and, therefore, that might
 7 suggest that he found it credible and I thought he was
 8 a particularly important person to listen to on this
 9 matter because he was somebody who had a great, you
 10 know, career as a Court of Appeal judge and as somebody
 11 who would be able to be objective, and also used to
 12 dealing with events and cases that were complex, where
 13 different issues were being put forward.
 14 So I was being very questioning about that matter.
 15 I would be keen, if it's possible, to just point to
 16 one other thing in that briefing note, which at the
 17 time, you know, if anything, I probably found reassuring
 18 but, with the benefit of the subsequent information I've
 19 seen by the Inquiry, is deeply troubling to me, which
 20 was the point on the previous page that sets out some of
 21 the cases that had been settled and mediated. So that
 22 was in the note itself.
 23 Q. Shall we go back?
 24 A. Yes, that would be really helpful.
 25 Q. That's UKGI00002472.
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1 details and wondered if the fact that he hadn't asked
 2 the report to be rewritten meant that he had found the
 3 report credible? She'd been keen for further
 4 clarification on this. She commented that she found it
 5 difficult to just accept [the Post Office's] analysis of
 6 the report without evidence.
 7 "For the future, please keep private office copied
 8 in on any newsworthy developments. I think we were
 9 fairly lucky that this story didn't gain much traction
 10 and Jo wasn't asked to comment. It is really important
 11 that we are aware of these kinds of events so that Jo
 12 feels prepared and sighted on issues within her
 13 portfolio."
 14 So we've highlighted two paragraphs there. Let's
 15 start with the first of those paragraphs. Can you
 16 assist us with what your concern was?
 17 A. Well, I mean, this is one of the submissions where
 18 I really so wish that my handwritten notes had been
 19 preserved because, reading between the lines of the
 20 private office email, I was not best pleased to see this
 21 particular thing. I mean, obviously we've got the nice,
 22 diplomatic private office bit at the beginning, saying
 23 "It was very useful but here's the real question and
 24 you've got to keep us informed in the future".
 25 So, you know, there was that paragraph about the
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1 A. It was on the second page. So this paragraph that
 2 starts:
 3 "In those cases that have been mediated or settled,
 4 POL considers it should have conducted itself better
 5 operationally, but it is important to stress that these
 6 are not system related."
 7 I think I would have taken some comfort from that
 8 fact, that the Mediation Scheme was, you know, finding
 9 that there were issues but they were not systemic or
 10 showing wider problems.
 11 But when I look at the Sparrow minutes from April,
 12 where it is minuted that they should accelerate the
 13 specific cases that are not thematic because it might be
 14 used to well to show the Minister, I mean, I consider
 15 that that is, you know, a premeditated manipulation of
 16 the Working Group process, specifically designed to
 17 reassure me that there isn't a problem, by presenting
 18 cases which are not representative, as one imagines in
 19 anything like this, there might be some simpler cases,
 20 by presenting those as representative of the vast number
 21 of subpostmaster cases.
 22 And -- I mean, to me, that just feels duplicitous to
 23 actually set out to prioritise those cases so that they
 24 can then pretend me that those are representative. And,
 25 I mean, there maybe was a case for, you know, making the
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1 simple cases go first, to build everyone's confidence in
2 the scheme and, you know, get some cases done, but to
3 show them to me as if they are representative, as has
4 been presented in this note, I mean, as I say, again,
5 just feels to me the opposite of what civil servants
6 should be doing and the opposite of what my general
7 experience was of dealing with civil servants.

8 **Q.** Thank you. If we turn back to the email chain, then.
9 That's UKGI00007352. I'm going to ask you about the
10 second of those bullet points that we looked at --
11 sorry, the second of the highlights that we looked at.
12 So that's page 2 at the bottom of that email:

13 "For the future, please keep private office copied
14 in ..."

15 Was there a concern at that stage about the level of
16 information that you were being given?

17 **A.** Yes, I think that the genesis of this note, and the
18 reason why my private office is thanking them for the
19 quick turnaround, was that it was one that didn't come
20 from them to us, as would often be the case and, indeed,
21 you know, from the earlier letters I signed, that
22 I would be regularly updated on progress with the
23 scheme, we would have anticipated. But, instead,
24 I think this was in response to some media reports of
25 the leak of the second -- Part Two of the Second Sight

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1 ask for the thematic report to be rewritten does not
2 suggest that he found it credible.

3 "Given the high number of objections that the Post
4 Office has flagged about Second Sight's thematic report
5 ... it is perhaps unlikely that any report will satisfy
6 all parties."

7 Then it's the final sentence there:

8 "It is not, at this point in time, appropriate to
9 ask Tony Hooper for more details about his views on
10 a report that is still confidential from the perspective
11 of the Working Group."

12 Were you told this at the time?

13 **A.** I'm sure this will have been relayed to me, not
14 necessarily with this full email but possibly in a cover
15 note from my private office. And I think -- obviously,
16 there was a confidentiality issue, I could appreciate
17 that, but I had thought it would be very helpful at this
18 point to get the views of Sir Anthony Hooper because of
19 his objective and independent position. Clearly there
20 was strong pushback against that at this point from
21 ShEx.

22 **Q.** You described it as pushback, looking at that final
23 sentence, to be told that it's not appropriate to ask
24 Sir Anthony Hooper for more details. Would you have
25 understood that formulation of words to have itself been

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1 Report, that went to the Working Group members and so,
2 you know, in response to that, myself or my private
3 office have then asked for a note.

4 So yeah, that did raise a concern and, very firmly,
5 officials were being told by my private office that they
6 needed to be more on it, in terms of making sure that
7 I was abreast of what was going on.

8 **Q.** Thank you. If we turn to the response from Mr Batten on
9 the first page, from the Shareholder Executive, he
10 address the point about why hasn't Sir Anthony Hooper
11 rejected this. He distinguishes between what were the
12 case reports and what is the Second Sight thematic
13 report. If we scroll down it says as follows:

14 "The report that Richards email referred to has
15 become known as the 'thematic report' and the intention
16 had been that it was produced as a generic reference
17 document for use during the mediation process. To be
18 clear, although the Working Group can recommend a case
19 for mediation, it plays no role in that mediation, which
20 is between the applicant and the Post Office as the two
21 involved parties. There is no role for Tony Hooper in
22 the mediation process either. ShEx officials understand
23 that the mediation process does not involve the Working
24 Group, Tony Hooper has taken the view that Thematic
25 Report is outside of his remit. The fact that he didn't

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1 appropriate?

2 **A.** I think, in the normal scheme of business, then that
3 would not usually be used, but I think the difference
4 with the Mediation Scheme is that you were dealing with,
5 you know, a very formal process, the CEDR have
6 guidelines about how it operates, it therefore was not
7 something that was totally familiar to me and I could
8 totally appreciate that there might be some boundaries
9 about at what point, you know, it would be appropriate
10 to speak to, you know, the former Court of Appeal judge.

11 I mean, I would note I did ask to meet Sir Anthony
12 Hooper a couple of months after this particular point,
13 and he declined to meet with me. And, in a sense, that
14 decision that he made rather reinforced the point that
15 I was being told about what was appropriate and where
16 that ministerial intervention could be, you know, to
17 what extent that was possible.

18 I obviously put a lot of store in Sir Anthony
19 Hooper's view of what was appropriate, as somebody very
20 esteemed with a lot of experience to be able to navigate
21 those boundaries.

22 **MR BLAKE:** Thank you.

23 Sir, that might be an appropriate moment to take our
24 second morning break.

25 **SIR WYN WILLIAMS:** Certainly.

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1 **MR BLAKE:** Can we come back just after 12.15, so shall we
2 say 12.17? Thank you very much.

3 **SIR WYN WILLIAMS:** By all means, yes.

4 **MR BLAKE:** Thank you very much.

5 (12.07 pm)

6 (A short break)

7 (12.17 pm)

8 **MR BLAKE:** Thank you, sir. I'm going to now turn to
9 preparation for the Westminster Hall debate. Can we
10 start with UKGI00002764. Thank you. This is a briefing
11 that has been prepared, and we'll come on to a question
12 that you ask about this briefing.

13 One of the questions that is put forward there --
14 sorry, it's zoomed out on my screen, I don't know if it
15 has on yours as well?

16 **A.** Yes, it has. My eyesight is not quite that good.

17 **SIR WYN WILLIAMS:** I haven't got it on screen at all,
18 Mr Blake.

19 **MR BLAKE:** It's just coming, sir.

20 **SIR WYN WILLIAMS:** Fine.

21 **MR BLAKE:** Sir, the second those questions, if we scroll
22 down, please:

23 "If it's not a Horizon issue that is causing the
24 problem, what is, 140 subpostmasters can't be wrong?"

25 The proposed responses are:

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1 session. I put the submission, speech, [question and
2 answer] ..."

3 I think that's the question and answer document we
4 have just seen.

5 **A.** Yes.

6 **Q.** "... and Hooper letter to Jo overnight and she had some
7 comments/questions."

8 If we look at the Q&A, the question that's
9 highlighted is one of those that I've just taken you to,
10 which is "Why did the Post Office agree to incorporate
11 convicted cases", and it's the reference there to
12 disclosure duty. It says as follows:

13 "Jo feels like she needs a bit of clarity on this
14 element of the legal process, another one to chat about
15 today."

16 Can you assist us, did you get that clarity?

17 **A.** Yes, I definitely got more clarity. I think I now have
18 severe questions about the accuracy of that but I felt
19 when I read this Q&A document that the phrase "There is
20 no doubt in my mind that it is being particularly
21 vigilant in this regard" was a strong phrase and,
22 therefore, it stood out to me as potentially reassuring
23 but I felt that, you know, in order to have confidence
24 in that phrase, as I was being encouraged to say this --
25 because the Q&A document, just so that people can

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1 "140 subpostmasters is less than 0.03% of the total
2 users of Horizon -- there are thousands of other
3 subpostmasters who have not made a complaint."

4 Reference there to:

5 "... investigations so far show that a large number
6 of the problems were caused by how the subpostmasters
7 themselves were using Horizon."

8 Over the page, please. If we scroll down to the
9 second of those questions, there's a further question:

10 "Why did Post Office agree to incorporate convicted
11 cases into the scheme if it knew it wasn't going to
12 mediate?"

13 One of the proposed answers there, bullet point 4:

14 "Post Office is, however, under an absolute duty to
15 immediately disclose any information which might
16 undermine the prosecution's case or support the case of
17 the defendant and Post Office has done so where
18 appropriate. There is no doubt in my mind that it is
19 being particularly vigilant in this regard as it carries
20 out its investigations."

21 If I could now take you to the covering email,
22 that's UKGI00000916. Thank you. It's an email from
23 your private office to Mr Callard and it says:

24 "Hi Richard,

25 "To be aware ahead of this morning's briefing

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1 understand, is, you know, in a Westminster Hall Debate
2 that is an hour and a half long, you don't know exactly
3 what's going to come up and you have to respond to all
4 of the issues or as many as you possibly can that are
5 raised in the debate. And so the Q&A is to help you be
6 able to then have your answers ready to be able to, if
7 you like, you know, pick and mix from the different
8 questions that come up, in addition to any speaking
9 notes.

10 So it was drafted with a view that I would be able
11 to say those words and I felt that if I was potentially
12 going to say those words, I needed to have a little bit
13 more confidence in "particularly vigilant". On a basic
14 level that the Post Office Limited had this legal duty
15 to immediately disclose information and was complying
16 with that duty felt uncontroversial, because that's what
17 you would expect of any institution or public body, that
18 they would comply with their legal duties, but
19 "particularly vigilant", I thought, yeah, well, that's
20 good, but what is this particular vigilance?

21 Now, I had a face-to-face briefing, as would be
22 common with any of these debate preparations, where
23 I would sit down with officials in advance of the
24 debate, and that was having read the debate pack and
25 then, rather than going through everything, we could

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1 just focus on the parts that I felt I needed to
 2 understand better, and this was one of those.
 3 **Q.** Just pausing you there, who was that meeting with?
 4 **A.** Definitely would have included Richard Callard, I think
 5 it's likely it would have also included one or two other
 6 officials from that team. I don't think anybody from
 7 Post Office Limited would have been there, that wouldn't
 8 have been my expectation, but I can't be categorical on
 9 that part.
 10 **Q.** What was said in relation to that passage that you had
 11 concerns about?
 12 **A.** So my memory is of being reassured. Now, I cannot tell
 13 you exactly which words were used but I know obviously
 14 that there had been the Altman Review, so I think it is
 15 likely that I was reassured by being told that a QC had
 16 examined the cases and looked at them, and there also
 17 had been -- although I don't think I was briefed about
 18 it specifically -- the Deloitte review.
 19 So my memory is of being reassured that independent
 20 reviews had been done that sounded very impressive and
 21 thorough and comprehensive. While I can't recall
 22 exactly which words were used, I expect that those would
 23 have been the ones that had been referred to, if not by
 24 name, then description of what they had done.
 25 **Q.** Thank you. Could we please now turn to UKGI00002837 and
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1 "Not surprising re decision not to share the
 2 speech."
 3 Just looking at the distribution list, at this stage
 4 we have Belinda Crowe and Patrick Bourke, both from the
 5 Post Office, copied in to this distribution list. He
 6 says, for example, at number 4:
 7 "[Second Sight] probably need permission from the
 8 Working Group. They have gone native but I think Jo
 9 could possibly commit to asking Tony about it at the
 10 risk of putting Tony in a difficult place.
 11 Belinda/Patrick, could we have a view and a line
 12 please?"
 13 Number 5:
 14 "Pass, over to POL. I know they are, or were,
 15 a prosecuting authority but if there has been a theft or
 16 fraud and it's in the public interest they have no real
 17 choice. Otherwise what's the deterrent? Anyone could
 18 put theft down to 'the system'. Belinda, could you do
 19 a line please?"
 20 Is it odd that two employees of the Post Office are
 21 in this distribution list and asked to comment within
 22 a distribution list that includes a minister's private
 23 office?
 24 **A.** I think, in the first line there, it says, "[Copy]
 25 Belinda and Patrick for expediency", so I suspect
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1 start at the bottom of the first page and into the
 2 second page.
 3 We have an email here from your private office to
 4 Mr Callard, 16 December, and it says:
 5 "So James [I think that's James Arbuthnot] no longer
 6 plans to share his speech with us ahead of time as
 7 apparently it is very inflammatory and he is worried
 8 about putting in an email ..."
 9 It says:
 10 "Him and Jo had a quick catch-up in which he
 11 outlined his main 'asks'. I understand you've got
 12 a packed day tomorrow but grateful if you could ask [the
 13 Post Office] about some of those as Jo will need to
 14 respond in her speech and would be good to know how warm
 15 she should be to those asks."
 16 We see there, for example, number 4 is:
 17 "He'd like Second Sight to do a briefing for
 18 [Members of Parliament] on the scheme and its progress.
 19 Jo would like to commit to asking Tony Hooper about
 20 this. What do you think?"
 21 At number 5:
 22 "He would like us to ask [the Post Office] to stop
 23 acting as a prosecutor on these cases."
 24 If we turn to page 1, we have response from
 25 Mr Callard:
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1 that -- I mean, I do think it's slightly unusual.
 2 I think the thinking, it looks like, was the debate is
 3 on Wednesday, the 17th, this is the Tuesday morning,
 4 therefore there is some quick turnaround required and so
 5 it's for that reason. So, I mean, I'm less -- looking
 6 at that now, I'm less, you know, appalled about that
 7 particular aspect than accepting what POL say without
 8 question, particularly in the context of what we know
 9 was being said about whether or not there was grip on
 10 the Horizon issue at the senior levels within POL.
 11 So asking POL for their view, you know, on some
 12 issues where they might only have the information, maybe
 13 this isn't the best way for it to be done but the really
 14 important thing should be civil servants, you know,
 15 probing and, you know, making themselves confident that
 16 they have all of the information that they need, and
 17 that they are doing so with a degree of, you know,
 18 critical assessment of analysis of what they're being
 19 told.
 20 **Q.** Does this email reflect that?
 21 **A.** No, I think this reflects a very cosy relationship.
 22 **Q.** Thank you. The Westminster Hall Debate was on
 23 17 December, so the day after this email. We don't need
 24 to go into what was said at the debate but do you think
 25 you were appropriately briefed for that debate?
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1 **A.** At the time I felt like I had the information I needed.
 2 I would have much preferred to have been able to meet
 3 with Sir Anthony Hooper; I was very disappointed that
 4 that could not happen. I did receive a letter from him
 5 which I was able to refer to in the debate with some
 6 basic numerical information but that was
 7 a disappointment.
 8 But knowing what I know now, I was absolutely not
 9 properly briefed for the debate. You know, at that
 10 point, Richard Callard knew from his presence on Project
 11 Sparrow that there had been moves afoot for eight
 12 months, by that point, to reduce the role of Second
 13 Sight, which had never been mentioned to me. I mean, it
 14 should have been mentioned when I returned from
 15 maternity leave, it should have been mentioned to me in
 16 the autumn when I was being briefed on this but, you
 17 know, even if it hadn't been mentioned then, it
 18 absolutely should have been mentioned to me when I was
 19 preparing for a Westminster Hall Debate on this issue,
 20 whereas, you will see from my comments, you know, I was
 21 still, and remained, and was of the view that Second
 22 Sight's Report on that process was incredibly important,
 23 and I referred to that in my remarks in the debate.
 24 **Q.** Can we turn to UKGI00002896. By the 22 December, you
 25 have received a letter from Alan Bates, and he raises

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1 on it, despite the run-up to Christmas. Immediately
 2 after the debate, I had had a -- as would normally be
 3 the case -- a huddle, if you like, with my officials to
 4 try to agree some next steps and one of the particular
 5 issues that I had -- or ideas that I had suggested was
 6 that we should extend an offer to MPs who had just been
 7 questioning me and making their points forcefully in
 8 a debate, that we should offer it to them to be able to
 9 be involved in being privy to the information in the
 10 Working Group and the mediation process, obviously for
 11 their specific constituents and obviously only if that
 12 specific constituent was happy with that situation.
 13 And, you know, my understanding from that huddle
 14 after the debate was that this would be taken forward by
 15 Post Office Limited, in terms of them writing to each MP
 16 about the issues raised and making that offer.
 17 I mean, I remember that I had chased it in early
 18 January, I think on 7 January --
 19 **Q.** Let's me take you to January.
 20 **A.** Sure.
 21 **Q.** Let's move to 7 January, UKGI00002920. The bottom
 22 email, I think, might be the one you're referring to and
 23 it's an email from your private office to Richard
 24 Callard:
 25 "Jo was asking me what the timeline for getting

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1 concerns in the first paragraph. He says:
 2 "Following that debate I thought I should write to
 3 you once more to offer to meet with you to discuss the
 4 issues involved with this matter from the perspective of
 5 those it has affected, rather than those who seem to be
 6 so desperately trying to keep the truth from you."
 7 Can you assist us with those who advised you, what
 8 their general approach was towards letters from Alan
 9 Bates?
 10 **A.** Well, their general approach was to draft a response.
 11 I would often only see the letter when a draft response
 12 had been put together, and those draft responses --
 13 I mean at different times during my tenure as Minister,
 14 you know, would be either more or less sort of helpful.
 15 So in the early part of my ministerial role, there was,
 16 you know, the Second Sight Report underway and then we
 17 had the Working Group recently having been set up, so
 18 there was some positive sort of engagement happening.
 19 And I think, by this point, it was much less
 20 positive in terms of the drafted reply and, indeed, that
 21 was delayed in being sent because the follow-up from the
 22 debate did not happen, in my view, in anything like the
 23 way that it should have done.
 24 We had a debate on 17 December, you know, Sir Alan
 25 Bates wrote a letter on 22 December. You know, he was

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1 advice from [the Post Office] on the next steps
 2 following the Horizon debate would be."
 3 The response is above.
 4 "... things are in train, for example:
 5 "[Post Office] are preparing a line-by-line rebuttal
 6 ...
 7 "We are liaising with [the Post Office] to write
 8 a letter to MPs who attended the debate ...
 9 "We are also seeking to prepare a 'mythbusters' type
 10 document ..."
 11 Then:
 12 "There is a Horizon Board subcommittee at Post
 13 Office on Monday which I am going to, which will plot
 14 out the way forward ... and we will update Jo next week
 15 when we see here."
 16 Can we please turn to UKGI00003007. We're now on
 17 15 January, so another week has passed. This is
 18 an email from Mark Davies, who is the Head of
 19 Communications at Post Office, emailing your private
 20 office, and he says:
 21 "I am writing to send you a note, attached, setting
 22 out the Post Office's detailed response to the
 23 allegations made by a number of MPs in Parliament during
 24 the Westminster Hall Debate on the Mediation Scheme in
 25 December. You may of course wish to table this in

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1 Parliament. Subject to your view we will also publish
2 this response on our website."
3 Now, I asked you earlier about an email where
4 members of the Post Office were copied into
5 a distribution list with your private office. Is it
6 usual for a Head of Communications from a company like
7 the Post Office to be emailing your private secretary
8 and to suggest that you may wish to table something in
9 Parliament?
10 **A.** I think sometimes people from Post Office Limited would
11 contact my office if they were sending a briefing note
12 or information. I can see that they might do that. The
13 Director of Communications, perhaps more unusual. But
14 I think this is probably in the context of me knowing
15 that a note was being created by Post Office, you know,
16 in response to the debate. So I mean that's not
17 particularly concerning to me. It's a formal email.
18 What was concerning to me at the time, I mean
19 I was -- I was actually pretty furious, that -- I mean
20 this is 15 January. The debate was on 17 December,
21 right? And, you know, like most of us, okay, yeah, took
22 Christmas Day off and had some time with the family but
23 we're working hard. Sir Alan Bates was working hard
24 sending a letter on 22 December, and the fact that Post
25 Office hadn't, you know, pulled their finger out to get
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1 were right and they had a very strong case against the
2 subpostmasters, that that information being presented to
3 those MPs, some of those MPs would say fair enough,
4 actually, I see your case; or that would not be the case
5 and so the MPs would be able to respond with even more
6 confidence that, having objectively looked at it, that
7 that wasn't, you know, what Post Office was saying was
8 wrong. So that was why I thought that was
9 a particularly important intervention.
10 **Q.** Let's turn to your response to Mr Bates, and that is
11 UKGI00003111. So we're now on 28 January.
12 If I could read just from the first big paragraph on
13 the first page, it ends:
14 "The system processes 6 million transactions nearly
15 every working day ..."
16 The same lines that we've seen previously: 500,000
17 users, et cetera. At the bottom:
18 "With regard to your point about Post Office 'taking
19 control of the scheme' and withholding information, it
20 would seem to me that Second Sight have spent more than
21 two years investigating these cases."
22 It's rather dismissive in tone, would you agree with
23 that?
24 **A.** It clearly has, quite a lot of information but you're
25 right that quite a chunk of that is information that was
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1 this response sorted quicker than, basically, four weeks
2 after the debate felt to me to be, you know, ridiculous.
3 And I was -- I remember actually I think it was couple
4 of days before this, you know, I vividly remember a kind
5 of conversation where I was basically told that the
6 letter still hadn't been sent and I couldn't really
7 understand it.
8 I just want to explain also why I was so interested
9 in the concept of MPs being able to see the details that
10 were --
11 **Q.** If you could explain quite briefly because we are
12 slightly out of time.
13 **A.** Okay. So one of the challenges here was trying to work
14 out where the truth lay. So I just had a Westminster
15 Hall Debate, where MPs were forcefully putting forward
16 points on behalf of their constituents, and receiving
17 an entirely different story from the Post Office. And
18 that was very difficult for me. I couldn't go into each
19 case and start looking through spreadsheets and try to
20 work out -- you know, I didn't have the skillset to do
21 that -- and try to work out who was right and who was
22 wrong but it was clear that they couldn't both be right.
23 And I did think that MPs being in a position where
24 they could at least be privy to that information would
25 result in one of two things: either, if the Post Office
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1 used in previous circumstances and it's definitely not
2 taking the letter as seriously as I think required, now,
3 looking at it from what I know.
4 **Q.** Are you aware of who drafted that letter?
5 **A.** I mean, I don't know exactly. I would imagine that it
6 would have had final sign-off by Richard Callard. It
7 may well be that one of his team produced an earlier
8 draft.
9 **Q.** Knowing what you knew by that stage, do you consider
10 that this was an appropriate response to have sent?
11 **A.** Well, knowing at the time, you know, what I should have
12 done, is agree to the meeting with Sir Alan Bates.
13 I really regret that I did not do that, and I'm sorry
14 about that.
15 **Q.** Why did you not do that, very briefly?
16 **A.** I was being advised not to, from the perspective of the
17 Working Group, you know, confidentiality and different
18 participants and, as I say, the -- Sir Anthony Hooper
19 declining to meet with me reinforced that perspective
20 somewhat. And just, you know, on a personal note, I'd
21 recently come back from maternity leave. The same
22 number of waking hours -- previously, I spent almost
23 every waking hour working, either in the ministerial
24 brief or in the constituency, and I now had some
25 additional responsibilities in my waking hours that
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1 needed to be fitted in, so additional meetings were not,
 2 you know -- pushing back on taking more meetings than
 3 I was being advised to do was not really top of my
 4 agenda but I should have done so and I do regret that.

5 **Q.** I'm going to move on now to the termination of Second
 6 Sight. At paragraph 74 of your witness statement --
 7 I don't think we'd need to bring it up on screen -- you
 8 reference to a table being shown to you by Mr Callard by
 9 that. If we could bring onto screen POL00102169, in
 10 your statement you said you hadn't seen a copy of that
 11 table. This is a document that would have been provided
 12 to you subsequently to your statement; is this the
 13 document that you were referring to?

14 **A.** I can't be certain but not least because it was waved in
 15 front of my face, rather than something that I had to
 16 look at overnight in a box, but I think it's certainly
 17 quite possible that it could have been.

18 **Q.** So I think in your statement you said you had no idea of
 19 the risks involved in relation to ending the Mediation
 20 Scheme. This is a document that addresses risks but
 21 you've described it as something that was waved in front
 22 of your face. Can you briefly assist us on what you
 23 mean by "waved in front of [your] face"?

24 **A.** That we were in a meeting, a verbal discussion meeting,
 25 and I think, as I say in my statement, Richard Callard

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1 systemic issues with the Horizon system that could cause
 2 these discrepancies. Rather, in most cases, that have
 3 been investigated, the discrepancies appear to have been
 4 caused by human error."

5 If we go over the page, please. We can see here,
 6 this is the hidden contents, so these are the comments
 7 in comment boxes on the draft, and it's in relation to
 8 that first part that I took you to, the part about
 9 seeking your agreement. The comment there is "Are we
 10 seeking her agreement?", and Mr Callard says:
 11 "Probably not at this stage. Think this is more of
 12 a sighting submission, and if she objects she would no
 13 doubt say. And it's not her scheme."
 14 What is your view on that?

15 **A.** They should have sought my agreement. It was a very
 16 significant issue and a very significant change, and
 17 this draft document on 25 February, which was ultimately
 18 sent to me on 4 March, was markedly different from what
 19 finally was sent to me. So --

20 **Q.** Perhaps we could scroll down over to the next page. We
 21 can see some passages that don't ultimately appear.
 22 Paragraph 9, I think you've highlighted in your
 23 statement where it says:
 24 "The advantages of this approach [that is mediating
 25 all cases remaining in the scheme and releasing Second

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1 said that he shouldn't be showing me this but he briefly
 2 did show me a document and he was -- yeah, giving the
 3 impression that he was being extra helpful by showing
 4 me, you know, additional information.

5 It doesn't, having looked at it now, it doesn't talk
 6 about the risks of removing Second Sight. That was not
 7 the way in which it was presented to me in that meeting
 8 or subsequently in the documentation that I received.

9 **Q.** Thank you. Let's look at the draft submission and
 10 a later submission. Can we turn to UKGI00003390.

11 This should be a document that allows us to see some
 12 tracked changes or some comments, and I will scroll down
 13 in a second. Let's just read. So this is a submission
 14 to you from Laura Thompson; was she a member of the ShEx
 15 team?

16 **A.** Yes, she was.

17 **Q.** "Purpose: To update you on the current state of the Post
 18 Office's Mediation Scheme dealing with complaints about
 19 the Horizon system, and seek your agreement to [Post
 20 Office's] proposed approach in light of likely steps."

21 Then there's a recommendation that you note the
 22 current steps and agree to the Post Office's approach.
 23 If we scroll down we can see there there's reference
 24 to Second Sight:

25 "It remains the case that there is no evidence of

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1 Sight from their engagement with the Post Office] are
 2 that it renders the whole of the Working Group redundant
 3 ... and reduces the scope for Second Sight or the
 4 [Justice for Subpostmasters Alliance] to continue to
 5 broaden the scope of the agreements. However, it will
 6 need careful handling with both participants and the
 7 media to avoid the implementation that [the Post Office]
 8 are seeking to 'hide the truth' or 'gag' Second Sight."

9 If we scroll down to the bottom of the page, there
 10 is another part that ultimately comes out, which is:

11 "We therefore recommend supporting [the Post
 12 Office's] proposed approach but it might get choppy."

13 If we scroll over the page, paragraph 14. It says
 14 there:

15 "Whether leaked or not, the Second Sight final
 16 report will give [the Post Office] a hook to determine
 17 that it's time to meant the terms of Second Sight's
 18 engagement and limit their involvement to reviewing the
 19 specific individual cases remaining in the scheme."

20 "Post Office are considering optimal timing,
 21 including a pre-emptive strike."

22 Can we please turn now to UKGI00000032. This the
 23 final version of that submission. We also have it --
 24 I don't need to bring it up -- at UKGI00014168.

25 Can you assist us with how the final version causes

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1 you concerns?
 2 **A.** So the initial version was going to ask for my agreement
 3 for the changes that were being made by POL to close the
 4 Working Group and mediate all cases. But the version
 5 that I received does not ask me to agree it. It asked
 6 me to note those changes. Then, it directs me to agree
 7 about not telling Parliament about this by written
 8 ministerial statement but that this is a finely balanced
 9 decision and, you know, that sort of screams "This is
 10 the bit you need to look at, worry about whether or not
 11 to lay a written ministerial statement".

12 The reference to Second Sight in the initial
 13 version, talks about limiting their involvement,
 14 discusses about it getting choppy, that they might be
 15 considered to have been gagged, and the version that
 16 I received does mention very briefly that their
 17 engagement would be terminated but in the context of
 18 that being a kind of natural consequence of the ending
 19 of the Working Group, and that their ongoing engagement
 20 would be there, in terms of being funded to investigate
 21 individual cases and also to complete their report.
 22 There is nothing that is mentioned about them being
 23 asked to destroy documents.

24 And, you know, then, I mean, the comments -- there
 25 is also a comment where one of the civil servants

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1 POL00132580 and it is a letter to you from Paula
 2 Vennells dated 9 March 2015. You've said in your
 3 statement this was something you requested; is that
 4 correct?
 5 **A.** Yes, so I did agree to make the written ministerial
 6 statement that I was advised not to make and that the
 7 best way to do that would be to be making a ministerial
 8 statement including a letter from Paula Vennells, and
 9 that was a common way of making a ministerial statement
 10 to be able to bring information into the official
 11 records of Parliament.

12 **Q.** The letter says as follows:

13 "I am pleased to say that Post Office Limited has
 14 now completed investigations into all the individual
 15 cases put forward for consideration in the Scheme.
 16 Furthermore, again I am pleased to confirm that no
 17 evidence has been found through these investigations of
 18 any system wide issues with Horizon.

19 "As a result, Post Office has now decided to put
 20 forward for mediation all cases remaining in the Scheme
 21 except those that have been subject to a previous Court
 22 ruling ... This will accelerate the conclusion of the
 23 Scheme in the interests of the applicants and ensure
 24 that we fulfil the commitments we made to them at the
 25 outset."

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1 speculates whether or not we should just ask me to
 2 consider whether my commitments to Parliament have been
 3 met because it would free us from having to worry about
 4 it, which I thought was rather disrespectful to
 5 Parliament and to, therefore, the constituents of the
 6 Members of Parliament, you know. Obviously, civil
 7 servants should be taking very seriously commitments
 8 that ministers have made to Parliament. Now, in the end
 9 they did produce that information.

10 I mean, it's a total changing of this submission.
 11 So, from reading this, did I know that Post Office were
 12 going to end the Working Group, mediate all cases, apart
 13 from criminal cases, that would then be referred to the
 14 Criminal Cases Review Commission? Yes, I knew that.
 15 But did they tell me that they were going to sack Second
 16 Sight and make them destroy documents? No. Did they
 17 tell me that, actually, they'd been discussing limiting
 18 and reducing the role of Second Sight for the previous,
 19 you know, ten months or so? No. If they had said that,
 20 would I have responded differently? Yes. And do they
 21 think that's why I didn't put that information in the
 22 submission? Also, yes.

23 **Q.** Thank you. There's one final document that I'm going to
 24 ask you about and I'll show you a couple of emails that
 25 relate to the way that it became drafted. It's

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1 It says:

2 "The Post Office will also continue to seek to make
 3 an independent review by forensic accountants Second
 4 Sight available to applicants where that has not already
 5 been provided."

6 Over the page, please. This one of the key
 7 paragraphs that I'm going to briefly be asking you
 8 about:

9 "For those applicants who have been subject of court
 10 rulings, two important points need to be drawn out.
 11 Firstly, we will continue to consider each of these
 12 cases carefully, on a case-by-case basis, even though
 13 mediation cannot overturn a court's ruling. Secondly,
 14 as prosecutor Post Office has a continuing duty after
 15 a prosecution has concluded to disclose immediately any
 16 information that subsequently comes to light which might
 17 undermine its prosecution case or support the case of
 18 the defendant. Having now completed its reinvestigation
 19 of each of the cases, Post Office has found no reason to
 20 conclude that any original prosecution was unsafe.
 21 Applicants remain able to pursue the normal legal
 22 avenues open to them to appeal court rulings with any
 23 further material disclosed to them, including that
 24 produced through the Scheme."

25 If we scroll down towards the end, it says:

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1 "The approach set out above will help bring the
2 mediation process to a conclusion earlier than envisaged

3 ...

4 "One of the consequences of our presumption in
5 favour of mediating in as many cases as possible is that
6 it brings to an end the role of the Working Group ..."

7 I'd just like to take you through the process by
8 which that was drafted. If we look at POL00386985, we
9 can see there that Mr Davies, the Communications and
10 Corporate Affairs Director at the Post Office,
11 circulates internally a draft.

12 We then see, at POL00223650, an amendment to the
13 draft. Thank you. If we scroll down, we can see, from
14 Mr Williams, he makes two points:

15 "The fourth paragraph, final sentence [change it]
16 to:

17 "'The Post Office will also continue to seek to make
18 an independent review available [et cetera]' (we may not
19 be able to actually deliver the independent review once
20 [Second Sight] are terminated; and

21 "Fifth paragraph, final sentence: 'Having now
22 completed its reinvestigation of each of the cases, Post
23 Office has found no reason to conclude that any original
24 prosecution was unsafe' (we should avoid talking about
25 appeals which have not yet been made)."

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1 assurances that were given to me in writing; these were
2 assurances that Paula Vennells delivered to me in
3 person, you know, across the table, looking me in the
4 eye and telling me that there was no problem, that they
5 had investigated, that they had not found anything that
6 would cause concern, which I cannot square with that
7 email I have now seen that she sent in October 2013,
8 that says that she is -- you know, her concern is about
9 an unsafe witness and their obligations of disclosure.

10 So she knew about the Clarke Advice and the lack of
11 credibility of the key witness that they had relied on
12 for so many prosecutions. I mean, I consider that she
13 did not tell me that at the time in the summer and
14 autumn of 2013 to be massively problematic, nor at any
15 point in the subsequent 18 months in any of our
16 catch-ups in any of the submissions that I received, and
17 that she would sit and look me in the eye and give me
18 those assurances and then put that in writing, you know,
19 it just beggars belief because she knew that there were
20 problems with convictions, and the safety thereof
21 because she had been told that in the Clarke memo.

22 And I got this letter and I did take it at face
23 value, I believed the assurances and, you know, in that
24 first briefing note where I met with Alice Perkins and
25 Paula Vennells in 2012, one of the bullet points --

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1 We can actually see in tracked changes that change.
2 Can we please turn to POL00223651. This is the amended
3 draft and, if we turn to the second page, please, the
4 end of the first paragraph, we can see that tracked
5 change, so it originally said:

6 "However, Post Office has not seen any evidence that
7 it believes would lead to a successful appeal."

8 That is now amended to:

9 "Having now completed its reinvestigation of each of
10 the cases, Post Office has found no reason to conclude
11 that any original prosecution was unsafe."

12 We saw that form of words in the letter that was
13 tabled before Parliament.

14 Can you assist us with what your understanding of
15 that was at the time?

16 **A.** So, having received this letter, which, without having
17 seen the tracked changes, is a very specific, confident,
18 robust letter that says, you know, "We've investigated,
19 we've looked at this, we've got this duty to disclose
20 immediately, any information that comes to light would
21 be disclosed, and, of course, there's all these avenues
22 for appeal, and, you know, there's no reason to conclude
23 that any original prosecution was unsafe".

24 That, to me, felt very reassuring and I just want to
25 be clear, as well, that this was not only a set of

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1 which I remember because it was unusual -- was that
2 Paula Vennells is also an ordained vicar, right? And so
3 she was sitting there, yes, as a Chief Exec of
4 a national organisation, national company, but she was
5 also sitting there with the moral authority of somebody
6 who was a minister of the cloth, right, not of some kind
7 of slick Chief Executive who seemed to care only about
8 profit. I believed her. I believed her.

9 **Q.** I did say that was the final document but just one more
10 document, it's UKGI00004006.

11 We can deal with this quite quickly, if we start on
12 page 3, we see, on page 3, on 20 March 2015 now, there
13 is a request from you in respect of you had been told,
14 I think, that it wasn't appropriate to receive a copy of
15 Second Sight's report. I think, if we turn to page 2,
16 we can see that you had challenged that and --

17 **A.** Multiple times.

18 **Q.** -- at the bottom of that page, that email from Laura
19 Thompson, she says:

20 "Our advice remains that Government should not
21 receive a copy of the report. The revised drafting
22 emphasises two points:

23 "[It'll] be sent to the Post Office ...

24 "... does not relate to the operation of the Horizon
25 system ... but rather, relates to issues which will be

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1 operational matters for Post Office."
 2 Now, we started today on distinguishing between
 3 operational matters and what were not operational
 4 matters. Do you think that the Second Sight Report that
 5 isn't being provided to you here, do you think that's
 6 an operational matter or something else?

7 **A.** Well, I mean, I think -- it's hard to know, having not
 8 received it, obviously, but I think clearly this is
 9 an issue where there was significant concern in
 10 Parliament and, more broadly, in the public, many
 11 subpostmasters and the Select Committee in Parliament
 12 has recommended that Government receive a copy.

13 I remember an earlier piece of correspondence,
 14 I think to Sir Alan Bates, where I was asked to sign off
 15 that the Government cannot compel its publication nor
 16 would we do so, and I remember challenging that and
 17 saying, "Well, hang on, if we could compel it, I think
 18 I would compel it to be published. Can we compel it?"

19 And I was told no, we can't. And then they said,
 20 because of the confidentiality which, you know,
 21 I accepted, but the confidentiality argument falls apart
 22 with the provision of it to Government, as the
 23 shareholder. So I felt like that was an important
 24 report that should be received by Government.

25 **Q.** Thank you. Finally, it might be suggested that
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1 **MR BLAKE:** Thank you, sir. It's 1.00, there are unlikely to
 2 be many significant questions from anybody. I'm just
 3 looking around the room to see if there -- yes.

4 There is one question from Paula Vennells' Legal
 5 Team and also from Mr Jacobs. I anticipate it will be
 6 around ten minutes in total.

7 It's a matter for you, sir, whether we --

8 **SIR WYN WILLIAMS:** I think if it is ten minutes, obviously
 9 it's sensible to complete it, subject to the transcriber
 10 being happy to do that and then subject to having
 11 reasonable break for lunch.

12 **MR BLAKE:** Yes. Sir, looking around the room, I think it
 13 may actually be sensible if we take lunch. Might it be
 14 possible perhaps to come back at 1.50?

15 **SIR WYN WILLIAMS:** Yes.

16 Before we take lunch, Ms Swinson, there are
 17 references in your witness statement to you being aware
 18 that the Criminal Cases Review Commission became
 19 involved but, unless I've missed it, I can't actually
 20 discern an approximate time when you first knew that.
 21 Can you help me with that?

22 **A.** Of course, Sir Wyn. My understanding of the CCRC's
 23 involvement was around the point where I was being told
 24 that they were going to close the Working Group and that
 25 POL had decided to do that and --
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1 politicians are coming to this Inquiry, finding it very
 2 easy to blame the Post Office, very easy to blame civil
 3 servants but don't look enough at their own roles. What
 4 do you think you did to contribute to the scandal?

5 **A.** There's various things that I wish I had done
 6 differently, as I set out in my witness statement.
 7 I should have met with Sir Alan Bates. I wished I'd
 8 asked to meet with Second Sight directly. I wish, on
 9 a couple of occasions, I had pushed more and probed
 10 more, and one of those was when I was told that the Post
 11 Office was changing their Prosecution Policy, and
 12 I wasn't told that in a formal briefing, it was off the
 13 cuff, and I think my response at the time was kind of
 14 relief and "About time!" but, actually, I wish I'd asked
 15 more questions at that point because I suspect that
 16 there were reasons for that.

17 And, ultimately, if Post Office, had been frank
 18 about that advice that they'd received, which I'm sure
 19 must be why they changed their Prosecution Policy, about
 20 the unsafe witness, I mean, years of anguish could have
 21 been saved for subpostmasters. Justice could have been
 22 years earlier, if that Clarke memo had been properly
 23 acted upon at the time. And I didn't know about it, and
 24 I wish I had, and I am just really sorry that -- I asked
 25 lots of questions and it wasn't enough.
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1 **SIR WYN WILLIAMS:** But this is 2015, basically?

2 **A.** Yes. I now know there was separate CCRC correspondence
 3 but I don't recall knowing that at the time and
 4 I don't -- haven't seen anything to suggest that I was
 5 briefed on that. It did seem to me, in the discussions
 6 about the Working Group, understandable that, if
 7 a criminal conviction has been reached and that that
 8 needs to be overturned, that that needs to go through
 9 a proper judicial process, which is why the CCRC
 10 involvement to me seemed reasonable, as a mechanism to
 11 deliver that element of the redress that was being
 12 sought by people who felt that they had been wronged.

13 **SIR WYN WILLIAMS:** Fine. Thank you.

14 So I have taken up a minute, Mr Blake. What time
 15 shall we resume?

16 **MR BLAKE:** If we could come back at 1.50 because we do
 17 finish early today.

18 **SIR WYN WILLIAMS:** Fine, yeah. That's fine.

19 (1.03 pm)

(The Short Adjournment)

21 (1.50 pm)

22 **MR BLAKE:** Thank you, sir. Ms Leek is going to ask the
 23 first question.

24 **SIR WYN WILLIAMS:** Yes. Pause.

Questioned by MS LEEK

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1 **MS LEEK:** Good afternoon, Ms Swinson. Just one issue,
 2 I represent Paula Vennells.
 3 You said this morning that Ms Vennells, and I quote,
 4 "knew about the Clarke Advices". Just one point arising
 5 from that: are you aware that there is no evidence to
 6 suggest that Ms Vennells was ever shown either of the
 7 Simon Clarke Advices by Susan Crichton or any other Post
 8 Office lawyer before she left the Post Office?
 9 **A.** In preparing for the Inquiry, I have been shown an email
 10 from October 2013 where Paula Vennells emails Alice
 11 Perkins, I think before going on leave and --
 12 **Q.** We have seen --
 13 **A.** I don't have --
 14 **Q.** Yes.
 15 **A.** -- the specific wording, so I may not remember
 16 precisely, but it basically says along the lines of "My
 17 concern about Horizon or Sparrow is our obligations of
 18 disclosure regarding an unsafe witness", which to me
 19 says that she knows that there was an unsafe witness and
 20 therefore is referring to the Clarke Advice. Now if
 21 she --
 22 **Q.** Let me stop you there, is it right to say then that the
 23 extent of your knowledge about what Paul Vennells was
 24 told is based on that particular email?
 25 **A.** She certainly didn't tell me about it and I wish she had

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1 email you're referring to?
 2 **A.** Yes, and I think that email speaks for itself.
 3 **MS LEEK:** Right, thank you.
 4 **SIR WYN WILLIAMS:** Right, thank you.
 5 **MR BLAKE:** Mr Jacobs.
 6 **Questioned by MR JACOBS**
 7 **MR JACOBS:** Good afternoon. I represent a large number of
 8 subpostmasters and mistresses who were ill treated by
 9 the Post Office in this scandal.
 10 At paragraph 131 of your witness statement you say
 11 you felt, instead of being provided with the important
 12 information on Post Office's motivations and plans in
 13 a timely way -- there's no need to turn it's up:
 14 "... I was being kept at arm's length and was being
 15 managed."
 16 Does that sum up your general experience in the way
 17 that you were briefed on the Horizon issue, being kept
 18 at arm's length and managed?
 19 **A.** Yes, I think that is what was happening, that's what
 20 they were attempting to do. I did ask and probe on lots
 21 of different elements of this, but the advice was, as
 22 you will see from the documents, very clear always to
 23 encourage me that this was an operational matter and
 24 then reassurance was provided in various ways.
 25 **Q.** Thank you, and you've given two examples of cases where

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1 and she should have done.
 2 **Q.** Yes, but I'm --
 3 **A.** Yes, it's that email.
 4 **Q.** -- trying to explore with you what you knew about what
 5 she had been told about the Simon Clarke Advices and
 6 I want to establish: is that based solely on that email?
 7 **A.** From that email --
 8 **Q.** Yes?
 9 **A.** -- to me it's clear she knew of at least the existence
 10 of the Clarke Advice and I would have thought that any
 11 Chief Executive being given information of that level
 12 would have asked to then see the document on which that
 13 came from.
 14 **Q.** Are you aware she was --
 15 **A.** But I don't know if she did or didn't.
 16 **Q.** Right. So you don't know that she was not given a copy
 17 of the Simon Clarke Advices. The entirety of your
 18 knowledge is based on that email between Paula Vennells
 19 and Alice Perkins?
 20 **A.** I don't know if she asked for the Clarke Advice. I know
 21 that she must have known about it's existence because
 22 where else would she have got that information about
 23 that unsafe witness?
 24 **Q.** I just want to establish -- it's not a difficult
 25 question -- the extent of your knowledge is based on the

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1 you weren't properly informed. You say that you weren't
 2 told that Second Sight were to be sacked, bound by
 3 confidentiality and records destroyed, and you would
 4 have objected strongly if you'd known. You also talk
 5 about you weren't told that the Chief Executive was
 6 considered to be unfit to do the job.
 7 In relation to that last point, you've described the
 8 manoeuvrings of the Shareholder Executive this morning
 9 as Orwellian; is that right?
 10 **A.** I think in the specific case that I used that language,
 11 it was about them knowing that the Post Office was
 12 changing its position on how it engaged with the
 13 Mediation Scheme and then telling me that other people
 14 were trying to reinterpret the terms of reference. And
 15 I think another example would be there was a Select
 16 Committee on 3 February, you know, I asked about the
 17 outcome of that Select Committee. You know, what
 18 happened, could I be, you know, given information about
 19 that and I was basically told there was nothing
 20 unexpected.
 21 I think that would be another example when Second
 22 Sight actually said they were concerned about unsafe
 23 prosecutions, where I should have been given information
 24 having asked for a readout of the Select Committee.
 25 **Q.** That's very helpful, thank you.

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1 In your evidence, you've confirmed, I think, that
2 Richard Callard was one of the people who kept you out
3 of the loop and you have given examples and we have
4 heard him writing "I want to get her in the right place
5 on Sparrow". I don't want to ask you about him.

6 Those clients that we have are interested to which
7 of the senior individuals within the Shareholder
8 Executive you blame, in addition to Mr Callard, for the
9 state of affairs that led to you being kept at arm's
10 length and managed in this way, and I'm going to give
11 you some names: Will Gibson, Mike Whitehead, Peter
12 Batten, Laura Thompson and Tim McInnes.

13 I've given you those names because those are the
14 names that feature in the documents we've been referred
15 to in your evidence. There may be some other
16 individuals. Do you think those individuals are to
17 blame and to what extent?

18 **A.** So I have been specific in my criticism of Mr Callard
19 and part of the reason for that, rather than generally
20 naming lots of civil servants, is that, from the
21 documents I've seen, I can now know that he was on that
22 Sparrow Subcommittee and so I have good reason to
23 believe he knew things that he wasn't telling me. What
24 I don't know about those other officials is how much of
25 their information was therefore reliant on what Richard

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1 Executive that you want to tell the Inquiry about today?

2 **A.** To be clear, I don't think a cultural solution is
3 sufficient but I also am supportive of the suggestions
4 that have come out, for example, about the Duty of
5 Candour. But I would also say that any official duty
6 like that being put in will also not be sufficient
7 without the right culture in place. And I do think
8 there was a different culture in ShEx that was not of
9 the usual Civil Service culture, which, as I say,
10 I found was generally a very helpful one that was
11 focused on the public good, and I think, while there is
12 a need obviously, to have, you know, relevant commercial
13 experience when you're dealing with companies, actually,
14 that mindset of public service is an incredibly
15 important part of what needs to be present in all civil
16 servants, even when dealing on commercial matters, and
17 I think that's the culture -- cultural element that is
18 important to instil.

19 **MR JACOBS:** Thank you. I don't have any more questions for
20 you.

21 **A.** Thank you.

22 **Questioned by SIR WYN WILLIAMS**

23 **SIR WYN WILLIAMS:** Ms Swinson, I just have a hypothetical
24 for you.

25 Let's assume we are back in 2014 and the documents

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1 Callard was telling them or, indeed, questions they were
2 asking of Post Office Limited, which is why would be
3 reluctant to go into a more, you know, detailed kind of
4 naming. But because of that specific role on the Board,
5 you know, I have information that Richard Callard knew
6 about things and I would just reiterate what I said
7 earlier on, that my general experience of dealing with
8 civil servants is that they were public spirited, they
9 were diligent in doing their jobs. You know, I think
10 this seems to me to have been exceptional.

11 That's one of the reasons why I find it so shocking.
12 This is an issue that affected so many people and the
13 only way ministerial oversight could operate properly on
14 that is with, you know, frank and full advice, and
15 that's why I'm angry that that was not provided because
16 it had so many impacts on real lives.

17 **Q.** I think you've said at the conclusion of your evidence
18 in your statement -- no need to turn it up -- at
19 paragraphs 146 to 148, that there are number of
20 recommendations that you make. One of the things that
21 you say is that the solution to the way arm's-length,
22 government-owned bodies are viewed and looked at and
23 checked by the Government might be a cultural solution.

24 My final question for you is, from your experiences,
25 were there any cultural problems within the Shareholder

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1 which related to the appraisal of Paula Vennells'
2 ability to carry on as Chief Executive had, in fact,
3 been drawn to your attention, all right, and let us
4 assume that you had been persuaded of the validity of
5 some of those criticisms.

6 Would it actually have been your decision as to
7 whether she would have been invited to leave the
8 organisation or, if not, how would the decision have
9 been made?

10 **A.** I certainly don't think it would have solely rested with
11 me --

12 **SIR WYN WILLIAMS:** Right.

13 **A.** -- because I think Vince Cable would have rightly been
14 involved in that decision. I do not know if it would
15 have been -- I mean, I -- something like that would not
16 have been on, you know, the whim of the Secretary of
17 State, so I imagine that would have been in discussion
18 with the Board. But, had those concerns been drawn to
19 my attention when I returned from maternity leave, then
20 that would have been a conversation with Vince, it would
21 have presumably been conversations with other -- you
22 know, with the officials from ShEx and then potentially
23 with the rest of the Post Office Board.

24 It would have totally changed the view on whether it
25 made sense, you know, appoint somebody else in terms of,

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1 you know, a strong CFO. There would have been a lot of
 2 things that were different and, of course, you know,
 3 assurances given by Paula Vennells about Horizon, in
 4 that context, would have been viewed very differently.

5 **SIR WYN WILLIAMS:** Yes, I'm not actually seeking to enquire
 6 into Ms Vennells herself; I was really concerned about
 7 the process. So if I summarised it in this way: that it
 8 would have come to you in the first instance but,
 9 ultimately, it would also have gone to the Secretary of
 10 State, there would have been wide consultation and would
 11 I be right in then adding that, ultimately, it would
 12 have been a decision of the Secretary of State?

13 **A.** That's my understanding.

14 **SIR WYN WILLIAMS:** Fine. Yes, that's fine. Thanks very
 15 much.

16 **MR BLAKE:** Thank you, sir.

17 **SIR WYN WILLIAMS:** Anything else, Mr Blake?

18 **MR BLAKE:** We do have some keep questions from Ms Patrick
 19 and Ms Watt.

20 **SIR WYN WILLIAMS:** Ah, sorry. Sorry to have jumped in.
 21 I assumed that was it. I apologise.

22 **MS PATRICK:** If Ms Watt wants to go first that's fine.
 23 Oh, there we go.

24 **Questioned by MS PATRICK**

25 **MS PATRICK:** Ms Swinson, my name is Angela Patrick. I also

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1 **A.** I'm afraid I don't know.

2 **Q.** You've given us your reaction about finding out about
 3 information that was communicated in the Clarke Advice
 4 but I just want to ask, if anyone in that room or
 5 elsewhere in Post Office, knew about bugs, the unsafe
 6 witness issue or that Fujitsu had remote access to Post
 7 Office branches, was any of that information, that ought
 8 to have been, briefed up to you before you took to your
 9 feet on 9 July?

10 **A.** Just to be clear, you said bugs, the remote access issue
 11 and you said one other thing?

12 **Q.** The unsafe witness issue.

13 **A.** The unsafe witness issue. Certainly not on the unsafe
 14 witness issue and certainly not on remote access.

15 **Q.** No, I think we're at cross purposes. I'm not saying was
 16 it briefed up to you.

17 **A.** Oh, right.

18 **Q.** If they knew, should it have been briefed up to you?

19 **A.** Yes, I believe so. The remote access issue would have
 20 been quite a technical element but, given how important
 21 it was, then, yes, I think the significance of that
 22 should have been. The issue of bugs, I would -- just to
 23 be clear, within the Second Sight Report, obviously, in
 24 July 2013, it was recognised that there were some
 25 anomalies and indeed in my statement to the House

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1 act for a number of subpostmasters. You can see
 2 Mrs Hamilton to my left and Mr Brentnall to my right.
 3 I apologise, I got one of my clients names wrong there!

4 Ms Swinson, I apologise for the break there with the
 5 technical difficulty. I only want to look at one
 6 document and it's the document Mr Blake spoke to you
 7 about this morning, the Fujitsu document, where you said
 8 you prompted yourself to reframe your decision and your
 9 reaction in more Parliamentary language.

10 I don't think we need to bring it up but I'll give
 11 the reference so we can have it in case we need to look
 12 at it, it's FUJ00174179, and we don't really need to
 13 look at it, I don't think.

14 You said and you've admitted that you wished you'd
 15 spoken to Second Sight, you wished you'd spoken to
 16 Mr Bates. Just to be absolutely clear, you didn't speak
 17 to Second Sight before the ministerial statement on
 18 2 July 2013?

19 **A.** No, I did not.

20 **Q.** You said you couldn't recall Lesley Sewell being in the
 21 room but there were many officials. I want to ask you
 22 about a few other names to see if it might jog your
 23 memory: Rodric Williams?

24 **A.** I'm not sure.

25 **Q.** Susan Crichton?

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1 I mentioned that no IT system is entirely bug free but
 2 what's important is that if something like that is
 3 identified, that it is rectified, and my understanding
 4 was that that had been what had had happened. Obviously
 5 that was my understanding, based on what I'd been told,
 6 but that turned out not to be the case.

7 **Q.** Indeed, in your recollection of that group that was
 8 huddled in your room, you're being briefed in a hurry
 9 for the debate and the conduct of the Post Office may
 10 have been criticised by MPs, was it a briefing, in your
 11 recollection, where both the Post Office and ShEx
 12 officials were present?

13 **A.** In my recollection is not that clear but I think it's
 14 entirely possible and, having seen the email, perhaps
 15 there was somebody from POL there. As I say, given the
 16 urgency of timing, if there was going to be any points
 17 that we needed POL to confirm or, you know, explain,
 18 that's possible. But I'm sorry, I can't be more
 19 categorical because it was a long time ago and a lot of
 20 people in a room.

21 **Q.** In a circumstance where you've got an arm's-length body
 22 that might be subject to criticism by MPs, is there any
 23 prospect that that would be a cause for concern for you,
 24 that you're being briefed by both the body that might be
 25 criticised and the individual officials?

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1 A. I mean, in order for me to be able to answer the
2 questions from MPs, I would need to understand what
3 POL's response would be and, obviously, I can only
4 really get that from POL directly. Obviously, that
5 could come via officials and, in the normal mode of
6 written submissions, that's how I would expect it to
7 work. But in a very time-limited scenario where
8 a debate is happening. If I've got a question, I'd say
9 "Well, hang on, what's happened here? What's the
10 position on this particular area?" My officials might
11 not know and so, yes, I wouldn't find it very unusual in
12 that scenario to necessarily have somebody from POL
13 there.

14 Q. Who would you rely on to give you an independent view in
15 those kinds of circumstances where an arm's-length body
16 might be criticised in a debate?

17 A. Well, I mean, obviously the officials, you would hope,
18 would have some ability to, you know, have a probing and
19 indeed, if I was, you know, in a conversation with
20 somebody from POL, I was doing that myself, right?
21 I wasn't just saying "Oh, right you say that". I would
22 then potentially be able to ask a follow-up question to
23 them to get the understanding. I think in the case of
24 POL -- you know, I had a number of arm's-length bodies
25 that I was engaging with as a minister.

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1 A. I mean, I can see that -- it probably wouldn't have been
2 my expectation at the time. The content of the
3 conversation that I would have had with officials, which
4 I would have expected was a kind of a private
5 conversation to understand the issues -- so I wouldn't
6 necessarily have expected that to be reported back to
7 somebody else.

8 Q. Just to be absolutely clear, were you told that Fujitsu
9 were going to be briefed on your briefing?

10 A. No, no.

11 MS PATRICK: Okay. Thank you very much, Ms Swinson. I have
12 no other questions for you.

13 A. Thank you.

14 **Questioned by MS WATT**

15 MS WATT: Good afternoon, Ms Swinson. I appear for the
16 National Federation of SubPostmasters.
17 Just getting into each other's view. Thank you.
18 Throughout your witness statement, you referenced
19 the briefings that you got and the meetings that you had
20 with George Thomson, who at the material time of
21 Horizon, was the General Secretary of the NFSP and the
22 Inquiry has heard what he has to say about it all.
23 We also saw a document this morning which said both
24 the NFSP and the Communication Workers Union had
25 expressed confidence in Horizon, so doubtless you took

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1 In the case of POL, I suppose I felt we almost had
2 a better opportunity to make sure we got really good
3 information because there was a NED on the Board who was
4 actually a civil servant, so we should have more
5 information.

6 Q. Can I stop you there a minute. You would have asked
7 questions but, on this occasion, you hadn't read the
8 Second Sight Report, had you?

9 A. But I cannot categorically say that I had read it in
10 full. I may have scanned it at that point. I'd had
11 a debate pack -- well, three debate packs in my box the
12 previous evening and I'd been reading as much as I could
13 for all of those debates.

14 Q. Were you relying on the officials in those circumstances
15 to ensure that you were getting an independent view?

16 A. Yes, the officials would be providing policy advice and
17 there would be a very strong view that what I was being
18 told by officials was factually accurate and --

19 Q. If we can look at that message back to the context
20 there, rightly or wrongly, looking at that conversation
21 within Fujitsu that you wouldn't have seen, would you
22 expect a ministerial briefing being given in the context
23 where an arm's-length body was possibly going to be
24 criticised in Parliament to be fed back to a third-party
25 contractor who themselves might be subject to criticism?

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1 reassurance from these positions.
2 You're nodding. I think --

3 A. Yes, sorry. I did and my experience of dealing with
4 both the NFSP and the CWU during my time as minister was
5 that neither organisation was shy about being critical
6 where they didn't agree with some things so, yes, I did
7 take some reassurance from the fact that they were
8 positive about Horizon.

9 Q. So I just want to ask you a couple of questions, then,
10 around the Crown post offices and the Post Office's own
11 employees. So thinking about this, last month the
12 Inquiry heard evidence from Tony Kearns of the CWU that
13 there were approximately 9,000 Post Office employees
14 working at Crown post offices and using Horizon, through
15 that relevant period, and likely they would have been
16 union members, so roughly the same as the membership of
17 the NFSP at the time.
18 He didn't have figures for Crown Office employee
19 prosecutions, except that there was some increase and
20 thought that some employees probably simply left
21 employment when faced with shortfalls. So perhaps a bit
22 of a different picture, as compared to the
23 subpostmasters.
24 So you sort of anticipated some of what I'm going to
25 ask. Can you say what sort of engagement you had with

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1 the CWU and if they ever raised Horizon with you?
 2 **A.** I met with CWU regularly but not as frequently as with
 3 the NFSP. I would -- maybe couple of times a year, but
 4 I can't be certain without access to those diary
 5 records, and I don't recall Horizon being raised by CWU,
 6 but it's hard to be absolutely categorical. But most of
 7 the discussions with CWU focused around some of the
 8 transformation in the Crown estate and the network
 9 transformation plans there and some of their concerns
 10 about that.
 11 **Q.** So thinking about what you were coming to know and had,
 12 in fact, you know, been put before you in relation to
 13 the issues about Horizon, although focused on
 14 subpostmasters, did you ever ask them about the Crown
 15 Office employees and were you not concerned about
 16 Horizon and how it might be affecting, effectively,
 17 civil servants, the state's own employees?
 18 **A.** I don't think I proactively asked the CWU about it.
 19 I do remember one conversation with George Thomson from
 20 NFSP but I can't tell you exactly when that was. And
 21 it's interesting in noting the figures that you set out
 22 because, in terms of -- you're right it's probably
 23 a similar number but, actually, at the time, that wasn't
 24 the way that I conceived of it, because I probably would
 25 have considered the NFSP that the vast majority of
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1 and also thank you for the detailed witness statement
 2 that you have provided. I want to go to that first, it
 3 should be in front of you. For the purpose of the
 4 record, it's WITN10310100.
 5 Now, before I ask you to look at your signature,
 6 there's two minor clarification points to make. Could
 7 we please have page 21, paragraph 59 of the statement on
 8 screen. It's the last sentence, you say:
 9 "The formal separation agreement was signed on
 10 1 April 2012."
 11 I understand you wish to clarify that to the fact
 12 that the formal separation agreement was signed in
 13 January 2012 and formal separation itself took place on
 14 1 April 2012 with further services between the companies
 15 ceasing thereafter.
 16 **A.** That's correct.
 17 **Q.** On the same theme, can we turn to page 40, please.
 18 Paragraph 119, you say:
 19 "A few months later on 3 April 2012, two days after
 20 the signing of the formal Separation Agreement ..."
 21 I understand that should read, "two days after
 22 formal separation"?
 23 **A.** That's correct.
 24 **Q.** Thank you. That document can come down for the time
 25 being. Dame Moya, can I ask you please to turn to
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1 branches and then there was a much smaller number of
 2 Crown Offices, though obviously larger branches.
 3 So they weren't raising it, and it wasn't something
 4 which I proactively raised with them, to my memory.
 5 **MS WATT:** Thanks very much.
 6 **MR BLAKE:** Thank you, sir. Those are all our questions.
 7 Our plan is to all stay in the room while there is
 8 a change of witness.
 9 **SIR WYN WILLIAMS:** Right, that's fine.
 10 So thank you very much, Ms Swinson, for making
 11 a detailed witness statement and for answering a good
 12 many questions today, this morning and into this
 13 afternoon. I'm very grateful to you.
 14 **THE WITNESS:** Thank you very much and for all of your work.
 15 Thank you.
 16 *(Pause)*
 17 **MR STEVENS:** Good afternoon, sir. Can you hear and see us?
 18 **SIR WYN WILLIAMS:** Yes, I can. Thank you very much.
 19 **MR STEVENS:** Thank you, sir. We're about to hear from Dame
 20 Moya Greene.
 21 **DAME MOYA MARGUERITE GREENE (sworn)**
 22 **Questioned by MR STEVENS**
 23 **MR STEVENS:** Please could you state your full name?
 24 **A.** Moya Marguerite Greene.
 25 **Q.** Thank you for attending the Inquiry today give evidence
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1 page 54 of your statement; do you see a signature?
 2 **A.** Yes.
 3 **Q.** Is that your signature?
 4 **A.** Yes.
 5 **Q.** Are the facts in that witness statement true to the best
 6 of your knowledge and belief?
 7 **A.** Yes.
 8 **Q.** That stands as your evidence to the Inquiry. It will be
 9 published on the Inquiry's website shortly. I am going
 10 to ask you some questions about it. I'm not going to
 11 ask you questions on everything but just a few of the
 12 key points.
 13 I'll start with your background. You spent the
 14 first part your career in the Canadian Civil Service,
 15 rising to work in the Privy Council Office?
 16 **A.** That is correct.
 17 **Q.** You then served as Assistant Deputy Minister at
 18 Transport Canada between 1991 and 1996?
 19 **A.** That is correct.
 20 **Q.** Following that, you held various roles in the private
 21 sector, including being President and CEO of Canada Post
 22 Corporation between 2005 and 2010?
 23 **A.** That is correct.
 24 **Q.** In 2010, you became Chief Executive of Royal Mail?
 25 **A.** Correct.
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1 Q. That's what I'm going to focus my questions on now.
 2 First, a few very broad questions on your responsibility
 3 as a CEO. Would you accept that ultimate responsibility
 4 for the operation of Royal Mail, the Group, rested with
 5 you?
 6 A. Yes.
 7 Q. Would you agree that identifying, analysing and managing
 8 risk is an important part of the executive running of
 9 a company?
 10 A. Yes.
 11 Q. In fact, it goes to the heart of the company executive,
 12 would you agree with that?
 13 A. *(The witness nodded)* Yes.
 14 Q. When running a group of companies, considering risk also
 15 means considering risk to the subsidiaries?
 16 A. Yes.
 17 Q. Can we please bring up your statement, page 10,
 18 paragraph 28. Thank you. Here we see from the title,
 19 talking about subsidiaries and group companies, you say:
 20 "The risks associated with a subsidiary entity such
 21 as [Post Office], whether these were legal, IT or
 22 finance related, would be reported to ..."
 23 It says ARC, that's Audit and Risk Committee:
 24 "... and updates provided to the Royal Mail Boards
 25 where significant risks were identified or were

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1 registers that they used and, on those risk registers,
 2 they included some reputational risks. Would
 3 reputational risks be something that a subsidiary should
 4 report to its parent company?
 5 A. Yes. The only hesitation I have is that, at that time,
 6 2010 to 2012, we were just actual starting to bear down
 7 on the establishment of risk management frameworks but,
 8 yes, generally I would agree, if there is a very big
 9 reputational risk, it should be reported.
 10 Q. What about the risk that a subsidiary has pursued
 11 a prosecution that has potentially resulted in an unsafe
 12 conviction?
 13 A. I think it depends on the scale, if that would be
 14 considered a material risk.
 15 Q. Pausing there, when you say "scale", is that referring
 16 to numbers or type of conviction?
 17 A. Numbers, type of conviction, what steps the company is
 18 taking to make sure that it doesn't happen again. It
 19 just depends. It's only a reputational risk if, you
 20 know, if it bears on how people view the organisation
 21 going forward.
 22 Q. So when we had, as I say, the significant risk and the
 23 sufficiently material risk to impact the Board's
 24 financials, I think what you're saying is, when you are
 25 referred to significant risk, it still has to be

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1 sufficiently material to impact the financials of the
 2 Group."
 3 You're distinguishing there significant risks and
 4 risks that were sufficiently material to impact the
 5 financials of the group. What types of significant
 6 risks there did you have in mind? Can you give any
 7 examples?
 8 A. Yes. We had a very big pension deficit, we had a very
 9 large pension programme and the deficit ranged between
 10 £4 billion and £12 billion, depending upon assumptions
 11 and time, so that was a very significant risk. We had
 12 cash risks in the Royal Mail. There were times when,
 13 you know, there were genuine worries that we just did
 14 not have enough cash for the operation. We had major
 15 risks in the operation. Having had a very good
 16 modernisation plan, it was difficult to implement it.
 17 That was a very big risk for the Royal Mail Group.
 18 You know, those were sort of three major risks. We
 19 had a regulatory framework that was archaic and out of
 20 date and we needed a new approach entirely. That was
 21 another major risk for Royal Mail going forward, given
 22 a very different competitive environment. So those
 23 would be four examples.
 24 Q. We heard from some witnesses from UKGI and the
 25 Shareholder Executive last week and we saw risk

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1 material to the group itself, to be reported up from the
 2 subsidiary?
 3 A. I wouldn't be categoric about that, Mr Stevens. As
 4 I said, we were just getting started on the
 5 establishment of risk registers and the processes that
 6 you put in place -- bottom-up, top-down -- to try to
 7 identify where the risks were, sifting through to
 8 understand what was the scale of the risk. But by and
 9 large, an Audit and Risk Committee would focus on the
 10 big risks and these would be the material risks.
 11 Q. As part of forming the risk register, as you say, do you
 12 recollect, did you ever see, on the risk register for
 13 Royal Mail or any of its subsidiaries, risks relating to
 14 the prosecution of subpostmasters?
 15 A. No, I don't recall seeing that.
 16 Q. I want to now look at some of the issues relating to IT
 17 without were funnelled through, or potentially funnelled
 18 through, the ARC. Please could we start with
 19 POL00030217. So this is an Ernst & Young document, it's
 20 a management letter for the year ending 27 March 2011.
 21 Do you recall seeing this document whilst in post at
 22 Royal Mail?
 23 A. No. It has been provided to the -- from the Inquiry to
 24 me.
 25 Q. When the Inquiry provided it to you, did you read it?

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1 **A.** Yes.

2 **Q.** Broadly, would you have expected to be made aware of
3 a letter such as this in your position as Chief
4 Executive of Royal Mail?

5 **A.** Not in detail. The relationship with our external
6 auditors was really primarily with our Chief Financial
7 Officer, Matthew Lester. He and I had a very close
8 working relationship, so any big issues that our outside
9 auditors, E&Y, would have said, he would have told me
10 about but I wouldn't expect to be told in detail about
11 the management letter for the Post Office.

12 **Q.** Can we look, please, at page 3. It's the "Executive
13 summary", and it says:
14 "The main area we would encourage management focus
15 on in the current year is improving the IT governance
16 and controlled environment.
17 "Within the IT environment our audit work identified
18 weaknesses mainly relating to the control environment
19 operated by [Post Office's] third party IT suppliers.
20 Our key recommendations can be summarised into the
21 following four areas:
22 "Improve governance of outsourcing application
23 management
24 "Improve segregation of duties within of the manage
25 change process

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1 at Royal Mail Board minutes that you provided a couple
2 of times but I, of course, now know what HNG-X means:
3 Horizon Online.

4 **Q.** Presumably you were aware at the time that Post Office
5 was rolling out a new front-end accounting software
6 system?

7 **A.** Yes, generally.

8 **Q.** So this risk or this point says:
9 "There are inappropriate system privileges assigned
10 to the APPSUP role and SYSTEM_MANAGER role at the Oracle
11 database level on the branch database server (BDB)
12 supporting HNG-X."
13 It goes on to describe some more of what it
14 describes as "inappropriate privileged access".
15 We've heard a lot about APPSUP at the Inquiry and
16 generally about remote access. At this point in time,
17 2011/2012, that period, were you made aware in any
18 detail of Fujitsu's ability remotely to access branch
19 accounts in the Horizon IT System?

20 **A.** No, I was not. However, in the minutes of the Audit and
21 Risk Committee, it was raised, and it was raised,
22 I think, at the initiative of our Chairman, Donald
23 Brydon, but it was raised in a way that was put in the
24 context of Fujitsu not really being prepared for the
25 audit in the previous year. And a lot of work had to be

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1 "Strengthen the change management process
2 "Strengthen the review of privileged access.
3 "We also encourage management to continue to enhance
4 the Legal and Compliance review framework to manage
5 risks in relation to regulatory compliance associated
6 with financial services activities."
7 Now, in a moment, we're going to look at some ARC
8 meetings and I'll ask you about how this was discussed.
9 Before I move on to that, though, I want to ask about
10 one specific part of the matters that were identified.
11 Could we turn to page 23, please. This is just to
12 orientate ourselves. We can see the title is "Current
13 Year Recommendations -- IT Specific", and it gives
14 a series of recommendations, which I don't need to take
15 you through. Could we please go to page 31.
16 In the table at the bottom, the bottom line, we see
17 it talking about review of privileged access to IT
18 functions; do you see that?

19 **A.** Yes.

20 **Q.** If we go over the page, it starts with POLSAP, which is
21 a back-end system that I'm not going to ask you about
22 but, if we go forward, please, HNG-X, which we now know
23 as Horizon Online. HNG-X, at the time, presumably would
24 have been a phrase of which you were aware?

25 **A.** Actually, I don't recall it and it has only been raised

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1 done by our outside auditor to make up for that. So it
2 was raised in a slightly different context and it
3 certainly was not emphasised.

4 **Q.** With hindsight, looking back now, is it the type of
5 detail that you would have expected to be raised at the
6 ARC committee at Group level?

7 **A.** That's hard to say. We had so many very big technology
8 risks. As I mention in my statement, the Royal Mail
9 technology estate was archaic, complex. We could not
10 really go forward with the modernisation programme as
11 planned without the ability to improve it. So I am not
12 sure, Mr Stevens, that this access issue that came up in
13 the context -- in a much larger context of the audit
14 work that had been done for the '10/'11 year would have
15 received that kind of emphasis. The technology estate
16 in the Royal Mail Group needed to be completely
17 revamped. So I don't know how much emphasis this
18 particular, and what we see now, very important point,
19 would have been given.

20 **Q.** Can we look, please, at RMG00000083.
21 So this is Royal Mail Group paper -- we see "Date of
22 ARC" -- so it's for the Audit and Risk Committee on the
23 8 December 2011. The author and sponsor is Chris Day,
24 the Chief Financial Officer of Post Office.
25 Contributors include Lesley Sewell and Rod Ismay. It's

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1 title is "Update on Post Office Limited, Horizon
2 controls and relationship with Fujitsu".

3 If we could turn the page, please, in fact, sorry,
4 to page 3., it says, "IT controls and SAS70 assurance".
5 Earlier, when you were referring to audit and
6 a discussion at the ARC, were you referring to that
7 SAS70 assurance?

8 **A.** That is correct.

9 **Q.** It also says this, in the middle:

10 "A number of IT control issues were identified
11 during the 2010/11 year-end audit, which were largely
12 centred on Fujitsu. Overall [Ernst & Young] that the
13 control systems were reliable, but they made certain
14 recommendations in the management letter following the
15 audit for improvements which have been implemented. The
16 IT control issues identified during the audit did not
17 relate to the integrity of accounting data in the
18 system. Rather, [Ernst & Young] made recommendations
19 about the documentation and authorisation of changes to
20 systems and about opportunities for streamlined
21 assurance."

22 If we go to page 6, please -- we don't need to cover
23 the whole of the paper -- at the bottom of the page,
24 please. It talks about the annual audit by Ernst &
25 Young. It says:

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1 needed to be corrected, but that it was not problematic
2 in terms of the integrity of the data that had been used
3 in the audit for the purpose of financial reporting.

4 And if I, you know, had focused on it, that's what
5 I would have drawn from it.

6 **Q.** I want to come to the meeting at which this was
7 discussed shortly but can we also look at another point
8 raised on page 7. We see it talks about challenges to
9 Horizon, and we know, by this point, Post Office had
10 received at least five letters of claim in the Access
11 Law/Shoosmiths related matter.

12 **A.** I only read four.

13 **Q.** We don't need to worry --

14 **A.** Okay.

15 **Q.** You received some letters?

16 **A.** We did not -- but, again, vastly understated, relative
17 to what was the scale of the issue. But yes.

18 **Q.** "[Post Office Limited] has, over the years, had to
19 dismiss and prosecute a number of subpostmasters and
20 Crown staff, following financial losses in branches."

21 Presumably by this time, December 2011, you were
22 already aware of Post Office's involvement in
23 prosecuting subpostmasters?

24 **A.** You know, Mr Stevens, I don't remember that but I have
25 read the documents, and I don't know how much I would

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1 "However, after additional control testing, [Ernst &
2 Young] confirmed that they were able to plates reliance
3 on the existing systems controls. Nevertheless, they
4 suggested certain improvements which could be made,
5 mainly relating to access."

6 Do you have any recollection of reading this paper
7 at the time?

8 **A.** I don't have any recollection of reading it and -- but
9 what I would say is that it's a very reassuring paper
10 and so, in previous minutes -- and again I don't have
11 any specific recollection of it -- the minutes report
12 that our outside auditor was annoyed that they had to do
13 a lot of extra work on their own initiative because
14 Fujitsu did not seem to be ready to do the kind of work
15 that was expected in a year-end audit and, as a result
16 e&Y did the work. They tested the systems and they
17 tested the control environment. They made a lot of
18 recommendations for improvement but they were able to
19 reassure the Board and the Audit and Risk Committee that
20 they were satisfied that there was integrity in the data
21 that was being used for the purposes of financial
22 reporting.

23 So it's in a context where, what anyone would draw
24 from it was that there was a problem with the audit
25 readiness of Fujitsu but -- and these things definitely

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1 have focused on that issue at that time because, as
2 I mentioned to you, when it came to our Audit Committee,
3 it came at the initiative of our Chairman, who had read
4 Private Eye's article and activated the Audit and Risk
5 oversight of this matter. And, from the reading of the
6 documents that you've provided, it just -- it doesn't
7 come across as an issue anywhere near the scale of what
8 the issue was. So, in answer to your question, I don't
9 know if I would have focused on that.

10 **Q.** My question was slightly different. My question was: if
11 you knew of Post Office's involvement in prosecuting
12 subpostmasters. I'm going to come to that in more
13 detail later, so park it there.

14 **A.** Okay.

15 **Q.** Looking at paragraph 26, this refers to four broad
16 strands of challenge, it says:

17 "Prosecution and civil debt recovery actions by POL
18 where the defence claim Horizon is flawed -- these have
19 consistently been won on the facts of Horizon
20 transaction logs. Judges have spoken supportively of
21 Horizon."

22 Then it goes on to discuss threatened civil claims
23 for damages, and it says:

24 "... 4 letters of claim have been received -- of
25 those, one is now time-barred", et cetera.

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1 So that's the papers that went there.
 2 Let's look at the minutes of the meeting itself
 3 please. It's RMG00000003. So we see it's the Royal
 4 Mail Holdings Audit and Risk Committee meeting on
 5 8 December 2011. If we can go down slightly, please.
 6 We see you are there listed second in attendance, and we
 7 also have further down, Chris Day, Lesley Sewell and Rod
 8 Ismay who were the three sponsors on that paper. Yes?
 9 **A.** Yes.
 10 **Q.** If we can go in the paper, please, to -- if we could
 11 turn the page, please, and again. Sorry, over the page,
 12 please, and down, please, to (f). Pausing there. So
 13 "Challenges to Horizon". It says:
 14 "[Post Office Limited] has, over the years, had to
 15 dismiss and prosecute number of subpostmasters and Crown
 16 staff, following financial losses in branches."
 17 So it's very similar wording to what was in the
 18 paper. It says:
 19 "The Committee noted the update on this matter."
 20 Would the paper have been supplemented by anyone
 21 speaking to it or would it simply have been read?
 22 **A.** I don't remember but, usually, if our corporate
 23 secretary used the word "noted", it was not discussed
 24 and, as you can see from the minutes, there are a lot of
 25 things on that agenda.

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1 it's noting matters to be covered in the report.
 2 In your witness statement, you say that the minutes
 3 do not disclose Rod Ismay, who was at this meeting,
 4 having made any statement to the committee about
 5 Horizon, and you make the point he'd done what we now
 6 know as the Ismay Report a year earlier.
 7 Now, you say the minutes do not disclose it. Do you
 8 have a positive recollection on whether Mr Ismay said or
 9 didn't say anything at the meeting?
 10 **A.** I don't.
 11 **Q.** What about Lesley Sewell?
 12 **A.** No, I don't have any recollection. I don't have any
 13 recollection of a discussion on this matter.
 14 **Q.** Shall we take, then, that your evidence on this is that
 15 the ARC were effectively reassured by the paper which we
 16 went to earlier?
 17 **A.** I would think so.
 18 **Q.** Can we look, please, at POL00029114. This was
 19 a document sent to you by the Inquiry. As you say in
 20 your witness statement, you're listed in the
 21 distribution list; do you have any recollection of ever
 22 receiving this or a document like it?
 23 **A.** No, I don't have personal recollection but I believe
 24 that this would have been done by the Royal Mail
 25 Internal Audit Group, led by Derek Foster with whom, you

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1 **Q.** By that, what sort of elements of that, sorry?
 2 **A.** Well, there were a lot of things to get through, and
 3 some of them would have been perceived, as at that time
 4 and on the basis of what was known and said to us at
 5 that time, some of the other items would have been
 6 perceived to be requiring greater allocation of time and
 7 discussion.
 8 **Q.** Can you recall, either at this meeting or at any other
 9 point, ever being told that Post Office had pursued
 10 a prosecution where a subpostmaster had raised Horizon
 11 as a defence and that subpostmaster had then been
 12 acquitted?
 13 **A.** I don't specifically recall that but, certainly, the
 14 documentation that you have provided allows me to see
 15 an email trail where, as I said, our Chairman,
 16 Sir Donald Brydon who was also, up until the time of
 17 Ms Perkins' appointment, was also the Chairman of Post
 18 Office Board, he having seen a document -- having seen
 19 it an article in Private Eye, activated the Audit and
 20 Risk framework inside Royal Mail. So I don't personally
 21 recall but I can see that -- from the documents you've
 22 provided, I have a reasonable picture of what happened.
 23 **Q.** If we go up, please, on this document, we see
 24 a discussion of the "Update on Horizon controls and
 25 relationship with Fujitsu". If we scroll down, we see

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1 know, we had a highly positive professional
 2 relationship, to the point that, if there had been
 3 anything, especially in this period of time, because
 4 remember we're almost through all of the discussions on
 5 separating all of the various points of intersection
 6 between Post Office and Royal Mail. If he, Derek, had
 7 any concern about anything not being attended to
 8 properly, the kind of relationship we had is that he
 9 would have spoken to me and I have no recollection of
 10 such a conversation.
 11 **Q.** So we see it's "Review of key system controls in
 12 Horizon", it's a draft report dated February 2012. If
 13 we turn to page 3, please. It talks about "Master data"
 14 at the top:
 15 "No audit trail exists for change requests received
 16 by Fujitsu from the Network Business Support Centre."
 17 It says at the bottom "Implication":
 18 "It is difficult to detect and prevent inappropriate
 19 changes being made to master data."
 20 Then "[Ernst & Young] Management Letter", at the
 21 bottom. It refers to the matters identified by the
 22 letter, and it says this:
 23 "Progress has been made in completing the actions
 24 arising from the [Ernst & Young] management letter. The
 25 [Ernst & Young] recommendations that require most

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1 additional work relate to", and then it lists out what
2 those were.

3 Did anyone tell you at this point, contrary to what
4 had been said before, the recommendations in the
5 management letter remained outstanding and to be
6 completed?

7 **A.** I don't recall that and, in other documents that have
8 been provided, it seems like we were being informed as
9 a Board that good progress was being made.

10 **Q.** Do you know, why has there been a breakdown in
11 communication? Can you help us with why the Board has
12 been given a different story?

13 **A.** I really can't because I don't have any personal
14 recollection of it and I'm trying to piece it together
15 from the documentation that the Inquiry has provided.
16 There was a lot going on, as there always was in Royal
17 Mail, around that time and, you know, I just -- I wish
18 I could help more.

19 **Q.** Is potentially a problem that there was a disconnect at
20 this point between -- or lack of communication between
21 Post Office and the Royal Mail Board because of the
22 impending separation?

23 **A.** I don't think so because, if you look at the whole
24 architecture around how the separation was going to take
25 place, it was very well thought out. All of the various

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1 **SIR WYN WILLIAMS:** I can.

2 **MR STEVENS:** Thank you, I'll continue.

3 Dame Moya, I now want to look at oversight of
4 criminal and civil proceedings. Please could we have
5 your witness statement at page 5, paragraph 13. You
6 say:

7 "The policy decision relating to Post Office
8 separation was taken long before I arrived at Royal
9 Mail. The Post Office operated in a fairly autonomous
10 way and had clearly done so for some time. It had its
11 own corporate functions including: Finance; IT; HR;
12 Government Relations; Company Secretary; Marketing; and
13 Legal."

14 Pausing there, what do you mean by Post Office
15 having its own legal function?

16 **A.** This was just an impression that I formed that in the
17 general corporate function areas, they had people who
18 specialised in those areas for the Post Office and the
19 impression was formed because, when we were doing all of
20 the work underpinning the separation, you know, we had
21 to think about people and the tasks that they did and
22 which ones of them would, under the transfer of
23 undertakings, go to one organisation or go to the other.

24 It seemed to me that, in these corporate areas --
25 and this, again, is just an impression that I formed --

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1 points of intersection had team leaders from Royal Mail
2 and from Post Office working together to try to assess
3 what would be the impact if we had to become separated,
4 what would be the service impact and how did we make
5 sure that we didn't drop the ball anywhere?

6 That was a very big framework that underpinned all
7 of the discussion that took place, quite across all --
8 both companies in every department. So it's hard for me
9 to understand, because there would have been a huge
10 amount of communication taking place in the context of
11 just trying to articulate what were the implications of
12 the separation in almost every single aspect, from
13 facilities to technology to finance to, you know, the
14 corporate secretariat. So it's hard for me to
15 understand how certain things like this did not get
16 flagged up more.

17 **MR STEVENS:** Sir, that's probably a good time to take the
18 afternoon break, as I'm coming on to a new topic. Can
19 I ask that we break until 3.00?

20 **SIR WYN WILLIAMS:** Yes, of course.

21 **MR STEVENS:** Thank you.

22 (2.50 pm)

(A short break)

24 (3.00 pm)

25 **MR STEVENS:** Sir, can you continue to see and hear us?

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1 in these corporate areas, it was very clear that there
2 were some people in the legal area whose work was almost
3 exclusively for the Post Office, and so they would go to
4 the Post Office.

5 **Q.** Just continuing on, it may become relevant later, you
6 also say:

7 "The two companies operated from different
8 headquarters (Royal Mail at Blackfriars, London and the
9 Post Office at Old Street, London)."

10 You refer to there being almost no overlap between
11 staff at the two organisations.

12 **A.** That is my recollection.

13 **Q.** Can we jump forward, please, to page 35, paragraph 103.
14 Thank you. You're here speaking about the Ismay Report
15 and you refer to David Smith, the Managing Director of
16 Post Office, not raising it with him, and you say:

17 "I would have expected David Smith and Post Office
18 Limited's Head of Criminal Law, Rob Wilson, to conclude
19 that an independent review was necessary."

20 Pausing there, was your understanding that Rob
21 Wilson was the Head of Criminal Law for Post Office
22 Limited?

23 **A.** Yes, but I don't remember him. I have learned that
24 through this Inquiry, and I apologise to Mr Wilson if
25 I have met him but I don't remember him.

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1 Q. If we can bring that document down, please, and bring up
 2 POL00046235. This is a letter I think you were given
 3 this morning by the Inquiry and you see it's on Royal
 4 Mail headed paper. It says "Legal Services, 3rd Floor,
 5 6a Eccleston Street", that looks like an address in
 6 Victoria, London. Do you recall that being an address
 7 operated by Royal Mail?
 8 A. I don't, I'm sorry. We had a lot of sites, hundreds of
 9 them.
 10 Q. You see it's sent to Maureen Moors, National Security
 11 Team, Post Office Limited and, if we look down, please,
 12 we see it concerns the case of Post Office Limited v
 13 Ishaq. Now, Mr Ishaq was convicted of theft on 7 March
 14 2013 and sentenced to 54 weeks' imprisonment. His
 15 conviction was quashed by the Court of Appeal in
 16 Hamilton & Others v Post Office. You'll have read from
 17 this document that Mr Wilson gives advice and comments
 18 on the charging decision.
 19 A. *(The witness nodded)*
 20 Q. You're nodding your head.
 21 A. Yes, yes, I'm sorry.
 22 Q. If we go to the end of the document, please, at the
 23 second page. It's Rob G Wilson, Head of Criminal Law,
 24 Criminal Law Division, and it's a Royal Mail email
 25 address, and at the bottom we have "Royal Mail is

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1 thinking there was a Criminal Law Team within the Post
 2 Office?
 3 A. Because I don't remember ever being briefed on
 4 subpostmaster issues except, you know, very
 5 tangentially. I remember that, from time to time,
 6 perhaps every half year, the Board would get an overview
 7 of security matters in Royal Mail, and everything from,
 8 you know, whether or not we were controlling our sites
 9 well enough, whether or not we had appropriate revenue
 10 protection in place, whether our products were properly
 11 designed to minimise, you know, any loss of mail because
 12 we were regulated on, you know, the safety of the mail,
 13 the security of the mail.
 14 So I remember that and, in that context, I remember
 15 hearing about offences that had been committed and,
 16 I mean, I'm sure that it would have included an overview
 17 for the whole group but I don't specifically remember
 18 offences against subpostmasters.
 19 The first occasion -- if I may, just to clarify --
 20 the first occasion when it really registered with me
 21 that, you know, there was the potential for wrongful
 22 prosecutions of subpostmasters was when I received the
 23 letter to me personally. I couldn't remember who --
 24 from whom it came and it turns out, on the basis of the
 25 evidence, on the documentation that you've provided me,

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1 a trading name of Royal Mail Group Limited".
 2 Were you aware, when you were CEO, that Rob Wilson
 3 worked within Royal Mail itself?
 4 A. I don't remember Rob Wilson but I suppose I should do.
 5 I mean, the evidence here is that he did.
 6 Q. Let's go wider. Were you aware of the Criminal Law Team
 7 in the Legal Department of Royal Mail?
 8 A. I was aware of a criminal law team, yes, because we, in
 9 Royal Mail, had offences as well as the Post Office did
 10 so, yes, I was aware of a criminal law team.
 11 Q. So when you say you had offences as well, are you
 12 talking about there where someone, maybe an employee of
 13 Royal Mail, was accused of, say, opening envelopes or
 14 stealing mail?
 15 A. Yes, of stealing Special Delivery. You know, there are
 16 a range of offences.
 17 Q. So you knew that the Criminal Law Team within Royal Mail
 18 dealt with those types of offences or allegations?
 19 A. Yes.
 20 Q. Were you aware that the Criminal Law Team within Royal
 21 Mail also dealt with prosecutions against
 22 subpostmasters?
 23 A. I wasn't. I thought that was dealt with by the Criminal
 24 Law Team in the Post Office.
 25 Q. Let's explore that. What basis did you have for

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1 it was Lord Arbuthnot. I am just trying to explain to
 2 you that I don't remember subpostmasters.
 3 Q. If I can pause you there because we'll look at when you
 4 received that letter shortly. Given the Royal Mail
 5 Criminal Law Team, which was within your company, was
 6 advising and was involved in the prosecution of
 7 subpostmasters, do you accept you should have known that
 8 as Chief Executive?
 9 A. Yes, I guess I should have known but I didn't.
 10 Q. Who briefed you on the extent of the role of the
 11 Criminal Law Team within Royal Mail when you joined the
 12 company?
 13 A. When I joined the company, the senior team was in
 14 a state of flux and I don't remember getting briefed on
 15 this. We had -- at that point, the General Counsel was
 16 a gentleman named Mr Evans. He wasn't there for very
 17 long. We appointed, then, on an interim basis, Jeff
 18 Triggs. I see from the documentation that has been
 19 provided to me from the Inquiry that Jeff Triggs did
 20 include some information to our audit committees on
 21 subpostmaster prosecutions but I don't personally recall
 22 being briefed on that.
 23 Q. Can we look, please, at POL00432053. So this the Master
 24 Services Agreement relating to the separation of Royal
 25 Mail Group and Post Office Limited. Can we turn to

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1 page 4, please. We can see in the recitals -- the
2 second recital refers to it -- that there's going to be
3 a separation of the current corporate structure, so they
4 will be separate companies, and at (C) it says:

5 "This agreement sets out the terms on which the
6 Provider shall provide the Services to the Recipient and
7 makes provision for the transition of termination of the
8 Services."

9 So, in essence, what this is saying is, before
10 separation, Royal Mail provided services to Post Office
11 Limited. After separation, we need to transition off
12 those services and this provides how that will happen.

13 **A.** Correct.

14 **Q.** I think you were involved in, I think, reviewing and
15 determining what services needed to go from Royal Mail
16 to Post Office?

17 **A.** Correct.

18 **Q.** Can we look, please, at page 147, which is part of the
19 first schedule to the agreement. You see "Section M",
20 it says, "Services to Cease", and this sets out the
21 services that were to cease on separation itself. So,
22 effectively, these services come to a stop on -- I think
23 it's 31 March, but ready for separation in April.

24 Correct?

25 **A.** Correct.

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1 ironically.

2 Can I ask you, sir, if you don't mind staying on
3 screen and we'll see if it can be fixed in a short
4 period?

5 **SIR WYN WILLIAMS:** Yes, that's fine. I'll just stay here,
6 quietly minding my own business until you tell me to pay
7 attention again.

8 **MR STEVENS:** Thank you, sir.

9 Dame Moya, I apologise. We'll try to sort this out.

10 (3.17 pm)

11 (A short break)

12 (3.21 pm)

13 **MR STEVENS:** Sir, can you continue and see and hear us?

14 **SIR WYN WILLIAMS:** Yes, I can.

15 **MR STEVENS:** We have hopefully resolved that matter now.

16 I'm going to go to a different document, actually.
17 Can we please bring up POL00030800.

18 So this a Royal Mail Group policy and we see at the
19 top it's Royal Mail Group, and then the business units:
20 Post Office, Royal Mail and Parcelforce. Yes?

21 **A.** Correct.

22 **Q.** We see the owner is Rob Wilson, Head of Criminal Law
23 Team?

24 **A.** Correct.

25 **Q.** If we can go over the page, please, the "Purpose" of the

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1 **Q.** We see "Workstream" on the middle column and then
2 "Description of services to cease". Can we please turn
3 to page 150. Is it possible to rotate that, please.

4 44 -- it appears we might be having some difficulty
5 with that. I hope you'll take it from me --

6 **A.** I will.

7 **Q.** -- 44, it says, "Legal" in the middle column and then on
8 the right it says, "POL Legal", and then, over the page,
9 it says 49 "Legal", in the middle column, and then in
10 the right column it says, "Criminal Law". Then the page
11 after, the Service End Date is 31 March 2012.

12 So this document shows that it was a part of the
13 negotiations and agreement about the criminal law
14 services from Royal Mail to Post Office stopping. Is
15 your evidence that you weren't aware that Royal Mail was
16 providing criminal law services to Post Office Limited?

17 **A.** I guess I didn't think -- it didn't register with me.

18 I suppose, if I, you know, think about it, maybe it was
19 all part of one team, but inside that team, certain
20 individuals worked exclusively on POL criminal legal
21 work and other individuals worked on Royal Mail criminal
22 work. I'm just not sure.

23 **MR STEVENS:** Can we bring up, please, POL00031004.

24 Sorry, sir. I think we're going to have to take
25 a five-minute break because the system has crashed,

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1 policy includes, 1.1.3:

2 "Applies equally to employees at every level,
3 whether frontline, management or executive, and to
4 non-employees equally, whether contractors, customers or
5 having no formal relationship with the Royal Mail
6 Group."

7 So would you accept this is a Group policy --

8 **A.** Yes.

9 **Q.** -- and within its remit would be prosecutions against
10 subpostmasters?

11 **A.** Yes. Well, I -- yes. If it -- yes.

12 **Q.** If we go to page 3, please.

13 **A.** The only hesitation I have, Mr Stevens, is the date of
14 this policy, because it was I believe in 2012, was it
15 not?

16 **Q.** Well, if we go back to page 1, please -- I should have
17 taken you to the date, for which I apologise -- it's
18 dated created September 2008, it's Version 3, effective
19 from April 2011.

20 **A.** The only reason why I think the date is important is
21 because, as part of the separation process and, indeed,
22 in preparation for a hoped-for listing of Royal Mail,
23 every policy in the company was updated. Every
24 employment policy, every facilities management policy
25 and, of course, this policy would have been part of

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1 that. So I think some of them went back to 2008 but
2 some of them were much older, and so I am -- the reason
3 why I am asking about the date is that, when you asked
4 me does it apply to subpostmasters, I guess it does, in
5 2011; in 2012, it probably would not.

6 **Q.** No, indeed. We don't need to turn it up but there is
7 a Post Office Prosecution Policy Version 1 that is from
8 1 April 2012. The reference for that, sir, for your
9 benefit, is POL00031034.

10 If we can turn, then, back to page 3, paragraph 4.5,
11 it describes about the requirements of the Group Code of
12 Conduct, and says:

13 "In the event of any disagreement with prosecution
14 advice in England and Wales, or inconsistency between
15 prosecution and conduct decisions anywhere in the United
16 Kingdom, the Head of the Criminal Law Team and the Head
17 of the Investigation Team will consider the case and
18 provide guidance and advice to ensure that the Royal
19 Mail Group maintains a consistent prosecution policy."

20 So the purpose of this document was, at group level,
21 to ensure the two amounts you used earlier, that
22 someone, a Royal Mail employee accused of stealing
23 letters, and a subpostmaster were prosecuted in
24 accordance with the same policy?

25 **A.** Yes.

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1 now, but I expect I would have.

2 **Q.** Would you agree that it's unusual for a business to
3 bring private prosecutions?

4 **A.** It has been a thematic strand in this Inquiry but,
5 I have to say, I am not as surprised as some people are
6 because, you know, I had a very senior position in
7 Canada when I was in the Civil Service, in the
8 Department of Transportation, and there were specialised
9 police forces with investigation powers and I believe,
10 in some cases, prosecution powers. So I was not as
11 surprised about that as some people have been.

12 **Q.** This is a private company. It may be owned by the
13 Government but it's a company; would you accept that
14 it's unusual for a company to pursue private
15 prosecutions?

16 **A.** I would accept that but, historically, you know, this
17 company has unusual roots. Historically, it started off
18 as a Government Department. So this may be a holdover
19 from its historical background.

20 **Q.** Would you agree that a business exposes itself to
21 various risks if it brings prosecutions?

22 **A.** Yes, and it exposes itself to risks if it ignores
23 offences against it as well.

24 **Q.** So, in bringing the prosecution, it could be criticised
25 in how it took the decision to prosecute; would you

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1 **Q.** That can come down, thank you.

2 In your witness statement, paragraph 12, page 5, you
3 say:

4 "When I joined, my immediate priority was to resolve
5 these issues in a way that would allow Royal Mail to
6 satisfy the Financial Conduct Authority's eligibility
7 requirements for admission of shares to the premium
8 listing segment of the Official List so that the
9 company's shares could be traded on the London Stock
10 Exchange and attract investor interest."

11 You go on to say:

12 "They necessitated a programme which involved
13 a complete review of: Royal Mail's policies, procedures
14 and practices (to enable Royal Mail to comply with its
15 ongoing listing obligations); the finance and operations
16 of the company; ongoing liabilities and risks; and
17 competencies of the Executive Team."

18 Would you, as part of that and in your role as CEO,
19 have reviewed policies such as the prosecution policy
20 I just took you to?

21 **A.** I remember reviewing a major thick book of policies but
22 I cannot tell you for certain if I focused on this
23 particular one. But I do remember being prepared for me
24 a very large book of policies. So I expect that I would
25 have read this but I don't have a recollection of it

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1 agree?

2 **A.** It could be.

3 **Q.** It could be criticised for the conduct of the
4 prosecution?

5 **A.** It could be. However, if the prosecution and the
6 decision to prosecute is a good one and a fair one,
7 backed by the kind of impartiality that would be
8 expected, then I don't think that it necessarily
9 presents a big risk.

10 **Q.** Is what you've done there: identified a risk, analysed
11 it and then suggested a mitigation for the risk?

12 **A.** Yes, but I would say, Mr Stevens, in that -- in that
13 framework, probably anything could be identified as
14 a risk if it's not thought of properly.

15 **Q.** There were clear and obvious risks arising from if
16 prosecutions aren't pursued fairly, would you agree with
17 that: for example, there's a risk of unsafe convictions?

18 **A.** Yes.

19 **Q.** Would you agree that bringing private prosecutions calls
20 for thorough oversight by the executive of the company
21 that is pursuing those prosecutions?

22 **A.** Not necessarily on a case-by-case basis, no. I think if
23 you have competent people and if they are exercising
24 their duties properly, you know -- and the Executive
25 Team of a company cannot do every job in the company, so

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1 I think it depends.

2 **Q.** You said there, if you had competent people, I think the
3 other one was if they were doing their job properly;
4 would you accept the Executive Team has to have a system
5 in place to check both of those things, to satisfy
6 itself that both of those things are being done?

7 **A.** Yes.

8 **Q.** Do you think extra care needs to be taken on those
9 matters where the business is investigating and
10 prosecuting alleged crimes where it itself is the
11 alleged victim?

12 **A.** I think, arguably, yes.

13 **Q.** What did the Royal Mail Board do in your time there to
14 oversee or mitigate the risk of prosecutions against
15 subpostmasters?

16 **A.** I think the most important thing that our Board and our
17 Audit and Risk Committee did, under the aegis of the
18 Chairman, who was, until Ms Perkins was appointed, also
19 Chairman of Post Office, when he read about -- in
20 Private Eye, he activated the risk management process of
21 Royal Mail, to make sure that they were apprised, that
22 there was an evolving situation that could indeed become
23 a larger risk than it was being presented at that time.

24 **Q.** Can I just pause you there. That's, I think you're
25 referring to where a Private Eye article was raised and

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1 subpostmasters being on the risk registers?

2 **A.** I don't recall it, no, but that doesn't mean that it
3 wasn't and that doesn't mean that it wasn't discussed.
4 It was a long time ago. I don't recall it.

5 **Q.** Is the answer that the Royal Mail Board took no steps to
6 oversee how prosecutions against subpostmasters were
7 being conducted?

8 **A.** I would not say that from the evidence that you have
9 provided me with. As I say, the -- we had -- it was
10 very clear where the management of risks in subsidiaries
11 lay and the management of, I think, this particular set
12 of risks probably started in Post Office but, from
13 a group perspective and getting your arms around the
14 risks of all subsidiaries in the organisation,
15 I certainly remember that being a preoccupation.
16 I can't give you the exact date.

17 And I think our Board members were alert to emerging
18 risks and, in that context, called for information, so
19 that it could be assessed by the Board. So I am sorry,
20 but I think you are being perhaps more categorical than
21 I would be on that.

22 **Q.** I want to move to a different topic and look at some of
23 your discussions with Paula Vennells, please. Can we
24 bring up POL --

25 **SIR WYN WILLIAMS:** Before you do that, Mr Stevens, can

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1 then queries were raised as to the integrity of the
2 Horizon IT system and the --

3 **A.** And the potential for --

4 **Q.** -- potential for civil claim. That's slightly different
5 from a proactive risk management approach and asking
6 what the Board did to satisfy itself that prosecutions
7 against subpostmasters were being carried out fairly.

8 **A.** All I can help the Inquiry with is the information that
9 has been provided to me because I don't have a personal
10 recollection but I will say that as we put in place the
11 risk management framework and developed the risk
12 register system, it was a process that cut across the
13 company entirely, including the subsidiaries. And so we
14 had a bottom-up and a top-down approach to the
15 identification of risks and, even though I cannot
16 personally recall this, but in the Legal Department,
17 they would have certainly flagged this up and decided
18 what kind of a rating to give it on the risk register.
19 So that's the first thing. And I think it was our Audit
20 and Risk Committee, under -- I think Matthew Lester was
21 the senior executive in charge of putting that process
22 in place. But this was a framework that was only just
23 beginning, in the 2010/2012 period.

24 **Q.** Can I just clarify: I think earlier in your evidence you
25 said you don't recall seeing prosecutions against

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1 I just ask, because it's been wandering around in my
2 mind as this discussion has been going on, following
3 separation, Dame Moya, Post Office, in about 2013,
4 either reduced very dramatically, or ceased prosecuting
5 subpostmasters. It doesn't matter the reasons why, for
6 the purpose of my question. What about Royal Mail? In
7 the period that you were Chief Executive, between 2012
8 and 2018 when you ceased to be, did Royal Mail continue
9 to prosecute its employees if they thought that
10 appropriate?

11 **A.** Yes, from the information, sir, that has been provided
12 to me, prosecutions reduced over time, as we took other
13 strategies to protect the mail and to protect our
14 revenue, but there were prosecutions.

15 **SIR WYN WILLIAMS:** All right. Thank you.
16 Sorry, Mr Stevens.

17 **MR STEVENS:** Not at all, sir. Thank you.
18 Could we bring up the letter from Lord Arbuthnot to
19 you. It's POL00105483. I think you were referring to
20 this letter earlier?

21 **A.** Yes, correct, sir.

22 **Q.** Can we go down, there's a -- there are two complaints in
23 this email. One is about the closure of a Post Office,
24 the second is in the second paragraph, and it says:
25 "I am concerned on a number of fronts. First, my

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1 constituents tell me that this case appears to be
2 a continuation of the problems that Post Office
3 employees have been having with the software system that
4 reconciled takings. I am aware of 34 individual
5 employees throughout the country who feel they have been
6 wrongly accused of fraud due to faults in this
7 particular system ..."

8 It goes on to discuss a meeting.

9 In your witness statement -- we don't need to bring
10 it up, but, sir, for you it's paragraph 112 -- you say
11 you have a positive recollection of this letter; is this
12 right?

13 **A.** I do. I didn't remember that it was Lord Arbuthnot but
14 I remembered getting a letter around this time which
15 registered with me, and it registered with me because it
16 was different from the way in which the issue had been
17 described in our Audit and Risk Committee.

18 **Q.** I think in your statement you refer to the fact that the
19 number, the 34 similar complaints, is that something
20 that triggered --

21 **A.** It did, yeah.

22 **Q.** Were you concerned that there may possibly be an issue
23 with the prosecutions that Post Office pursued at this
24 point?

25 **A.** I didn't know about that. I was concerned that there

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1 **Q.** That document can come down. Thank you.

2 In your statement you refer to a conversation that
3 you remember having with Paula Vennells thereafter. Did
4 you express those concerns to her?

5 **A.** Yes.

6 **Q.** What did she say in response?

7 **A.** Well, I had suggested to Mrs Vennells that we really
8 needed to do a complete drains-up, root and branch
9 review of that system, taking into account, you know,
10 what people were saying about it. You know, this was
11 not any longer just a handful; I mean, this is
12 a significant group of people. And she said that the
13 system had been reviewed, it had been reviewed on
14 multiple times -- at -- you know, multiple occasions,
15 that there was no problem with the system, that there
16 could be issues around keying errors but she had --
17 there, certainly, what I recall from the conversation --
18 she didn't think we needed to do the sort of independent
19 review that I was suggesting.

20 **Q.** Why didn't you go ahead with an independent review
21 within Royal Mail?

22 **A.** That's a good question. I think I was somehow given
23 reassurance that it had been tested, it had been
24 reviewed but also, at that time, you know, all of the
25 issues, the substantive issues around separation, had

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1 was something wrong with the system and it -- that the
2 fault in the system was causing people to be falsely
3 charged and horribly falsely convicted. So I didn't
4 know that the process for the prosecutions was also the
5 subject of such, you know, disquieting and, you know --
6 **Q.** But you had a concern about the convictions because of
7 the system?

8 **A.** I did. I thought, because what we were being told at
9 the audit committee -- and it's borne out in the
10 minutes -- we were told that there's no problem with the
11 system, and that we were also told that there were
12 a handful, a few people who were blaming the system but
13 the fault was not with the system. This caused me to
14 think about it in a different way.

15 **Q.** Were you concerned that there may be claims against
16 Royal Mail Group?

17 **A.** No, not at all. I mean, it's hard for people to imagine
18 but, you know, we had the biggest fleet in the country.
19 We had thousands and thousands of suppliers. We had
20 lots of claims against Royal Mail. And so, you know,
21 I'm not -- I was not worried about claims about Royal
22 Mail. What I was worried about was that there might be
23 people who are being wrongfully convicted on the basis
24 of a false belief on our part that the system is, you
25 know, faultless.

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1 been resolved. We had -- in the Post Office Board and
2 in the Royal Mail Board, our Executive Teams had been
3 given the go-ahead to sign the agreement, so the
4 practices and conventions and protocols that were in
5 place for companies that were entirely separate, those
6 were live and, for those two reasons, I didn't press it
7 further at that time.

8 **Q.** Did you think, at that point, that that is an issue, the
9 allegation of potentially unsafe convictions; did you
10 see that as being something that totally transferred to
11 Post Office on separation?

12 **A.** Yes, because, you know, I thought that the prosecutorial
13 function, even if it may have come under the heading of
14 Royal Mail Group, I thought it was a team inside the
15 Royal Mail Group that carried out all of those tasks.

16 **Q.** What do you mean by that when you say you thought it was
17 a team inside the Royal Mail Group --

18 **A.** I thought that -- well, let me try to put it in context.
19 When we did all of the work on the separation, in all
20 areas of the company, we had teams working at all levels
21 and there was an escalation process if there was any
22 issues or, you know, you couldn't get to resolution as
23 to how that particular area was going to be dealt with.
24 Nobody raised to me, in the context of that, that there
25 was any issue with respect to legal or criminal law, and

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1 my assumption, perhaps wrong, was that this was a pretty
 2 easy group of employees to move to the Post Office, my
 3 assumption was because they had spent most of their
 4 daily working time on Post Office matters.

5 **Q.** So at this time, you did know there was a team in Royal
 6 Mail working on the criminal law aspects which was to
 7 transfer over, that's what I'm trying to --

8 **A.** Well, I'm just saying to you it wasn't raised to me as
 9 an issue. I knew that there was a Royal Mail Criminal
 10 Law Team but, perhaps wrongly, I thought, inside that
 11 team, there were dedicated resources that were working
 12 on criminal law matters for Post Office. That was my
 13 assumption.

14 So in my conversations with Mrs Vennells, first,
 15 I didn't know at that time that there was any issue
 16 about the oppressive and harsh nature in which the
 17 prosecutions were being conducted, but, secondly -- and
 18 I think more importantly -- I thought these -- there was
 19 a separation between prosecutorial matters inside the
 20 Post Office versus prosecutorial matters inside the
 21 Royal Mail.

22 **Q.** I'm going to jump forward quite significantly in the
 23 timeline now. Can we bring up PVEN00000500 and page 2,
 24 please. These were documents provided by Paula Vennells
 25 to the Inquiry to suggest that they are messages on
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1 person that she has been portrayed.

2 **Q.** So this is effectively supportive, saying you wouldn't
 3 accuse anyone of doing anything wrong without a basis,
 4 or something along those lines?

5 **A.** Well, I think it speaks for itself.

6 **Q.** Can we please bring up PVEN00000533. It's another
 7 message, it says:

8 "Dear Paula
 9 "What a terrible time.
 10 "Just tell the truth.
 11 "I know you are a good person and friends will be
 12 hard to find now.
 13 "What has happened is a terrible, horrible thing.
 14 So many lives ruined.
 15 "Yours too.
 16 "Just tell the truth.
 17 "What you knew. What you thought at the time.
 18 "What they told you!
 19 "Any mistakes you made."
 20 Do you recall roughly when you sent this text
 21 message and what prompted you to send it?

22 **A.** I think I had been travelling and I had come back into
 23 the country after an extended trip, and I think my
 24 YouTube artificial intelligence was sending up things
 25 for me to watch but I can't remember exactly.
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1 9 May 2022; do you accept these are text messages
 2 between you and Paula Vennells?

3 **A.** Yes.

4 **Q.** Can we go down, please, to the one at 8.41, and you say
 5 at the bottom:

6 "Horizon is the real villain here and thank god we
 7 finally learnt about the frailty in the system. We
 8 think it is computerised, it is untamperable, infallible
 9 ...
 10 "Not so.
 11 "Stand tall.
 12 "I know you are a good person and would never never
 13 accuse anyone in the wrong."
 14 Can I ask what you meant by that last line:
 15 "I know you are a good person and would never never
 16 accuse anyone in the wrong."

17 **A.** Well, the first thing I want to say is that I thought
 18 this would be a private communication and I want to just
 19 say there's a context to this. Mrs Vennells was being
 20 vilified in the press, and we didn't know, at that time,
 21 in 2022, what we know now, as a result of the evidence
 22 that has emerged in this Inquiry. And so, at that time,
 23 I could only say what I saw, and what I saw when
 24 I worked with Mrs Vennells was a hard working executive
 25 who was a problem solver, and not at all the kind of
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1 **Q.** We see, over the page, there's a reply, and then the
 2 message starts:

3 "Paula,
 4 "Am just back in the UK."
 5 If we could then bring up PVEN00000532. We see that
 6 message picking up there:

7 "Paula,
 8 "Am just back in the UK.
 9 "What I have learned from inquiry/Parliamentary
 10 committee questions is very damaging.
 11 "Nick was a poor witness."
 12 Is that Nick Read?

13 **A.** Yes.

14 **Q.** "Chairman gone. He will be next.
 15 "When it was clear the system was at fault, the
 16 [Post Office] should have raising a red flag, stopped
 17 all proceedings, given people back their money and then
 18 tried to compensate them for the ruin this caused in
 19 their lives."
 20 Go over the page, this is the reply:
 21 "Yes, I agree. This has/is taking too long Moya.
 22 The toll on everyone affected is dreadful.
 23 "I hope you have a good break and are well."
 24 You then say:
 25 "I don't know what to say. I think you knew."
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1 What did you think Paula Vennells knew?
 2 **A.** Oh, gosh. I think she knew, on the basis of the
 3 evidence that has emerged in this Inquiry, that there
 4 were faults in the system. I think that Post Office
 5 Executives, including Mrs Vennells, continued to
 6 slavishly, in my opinion, adhere to the position that
 7 was not tenable, on the basis of the evidence presented
 8 here, that there were no faults or, you know, if you
 9 look at the evidence that has been given in my bundle
 10 and has been presented to the Inquiry, going back to
 11 2008, Fujitsu told Post Office employees, I don't know
 12 who, that there was the ability to manipulate branch
 13 accounts remotely.
 14 And then, in 2010, it was -- that information went
 15 beyond that individual exchange between Fujitsu and Post
 16 Office. It went now into Post Office, 2011 --
 17 **Q.** Sorry, I don't mean to interrupt, can I pause you there?
 18 One thing I wanted to ask here is, there's a change from
 19 the message I took you to first to here and you're now
 20 saying "I think you knew". The change and the points
 21 you're making there, what is the basis of the knowledge?
 22 Is it things that have come out in this Inquiry?
 23 **A.** Yes.
 24 **Q.** Is there anything else that you're basing that on?
 25 **A.** No.

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1 I understand there may be questions from Core
 2 Participants. If I may just take a moment to get time
 3 estimates, we had a slight break with the document.
 4 *(Pause)*
 5 Sir, we do have requests. Mr Henry has asked for
 6 I think 10 to 12 minutes, and -- it's just Mr Henry,
 7 sir.
 8 **SIR WYN WILLIAMS:** Right. Well, I am sure that Mr Henry
 9 will adhere to his time estimate.
 10 Over to you, Mr Henry.
 11 **Questioned by MR HENRY**
 12 **MR HENRY:** Absolutely, sir.
 13 Dame Moya, you're a strong leader, would you agree?
 14 **A.** I don't think it's for me to say, Mr Henry.
 15 **Q.** But you have clear objectives which you communicate
 16 clearly to the people who work with you?
 17 **A.** I have tried to do that, yes.
 18 **Q.** Yes. You set the tone about what had to be done and how
 19 it was to be accomplished, so far as the separation, the
 20 investibility and the ultimate flotation, together of
 21 course, with Sir Donald?
 22 **A.** Yes, and a very strong Executive Team.
 23 **Q.** Now, if it had become apparent that unpredictable
 24 intermittent bugs, errors and defects in Horizon had led
 25 to the prosecution, conviction and imprisonment of

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1 **Q.** Has anything that's come out in this Inquiry made you
 2 reflect on past events, conversations with others, when
 3 you were in post in Royal Mail, in a different way?
 4 **A.** Well, the only conversations I had were with people who
 5 would probably be as shocked as I am that all of the
 6 assertions and undertakings that had been given to all
 7 of us, the Executive Team of Royal Mail, the Audit and
 8 Risk Committee of Royal Mail, these were just not so.
 9 So I don't think that those conversations would have
 10 helped me. It was really -- what changed my mind was
 11 the evidence that has come out of this Inquiry.
 12 **Q.** I perhaps didn't ask, my question is slightly different:
 13 when you have seen something in this Inquiry and what
 14 you've learned through the Inquiry, has any of that,
 15 when you're looking back on conversations you may have
 16 had with Paula Vennells in 2015, 2011, has any of that
 17 information given you a different reflection on that
 18 conversation, or do you see it in a different light?
 19 **A.** I do see it in a different light. Because I do think
 20 that we were misled. I think that it was grossly
 21 understated, the gravity of the situation, and it has
 22 had calamitous, calamitous results for people. So
 23 I think we were misled, and this assertion continued,
 24 you know, for a very long time.
 25 **MR STEVENS:** Sir, those are all the questions I have.

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1 innocent people, that would have threatened your
 2 objectives, would it not?
 3 **A.** No.
 4 **Q.** Why not?
 5 **A.** Well, my objectives were to modernise the company, to
 6 establish better relationships with our employees,
 7 better relationships with our unions, to modernise the
 8 technology, to try to create a company that had
 9 a customer focus --
 10 **Q.** Can I stop you there --
 11 **A.** Those were my objectives, and so, you know, if we were
 12 doing something wrong, I would not shy away from it.
 13 **Q.** So let's, then, proceed with that clear and unambiguous
 14 statement. You wouldn't have shied away from it. But
 15 it would have had a massive setback to the separation
 16 and the investibility of the entity, would it not,
 17 because you would have had this grotesque and appalling
 18 scandal, wouldn't you, unfolding on your watch?
 19 **A.** Well, I would say, if I knew then what I know now,
 20 I would certainly not have managed this horrible,
 21 grotesque -- to use your word -- in the way in which it
 22 was managed. My view is that, when you find out that
 23 something has been done in gross error, like this, you
 24 put your hand up and you try to set it right as fast as
 25 you can. And, you know, if you do that, as

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1 an organisation, you're far better off than if you just
 2 let things drift and get bigger and cause more ruination
 3 to people.
 4 **Q.** Everybody would agree with what you've just said, so why
 5 didn't you surface the risk?
 6 **A.** Well, I go back. I think we did. You know, if I look
 7 at --
 8 **Q.** I'm sorry, you think you surfaced the risk?
 9 **A.** Well, we didn't understand the risk because we were
 10 deliberately, in my opinion, misled.
 11 **Q.** Part of it, though, you surely must accept, is that
 12 significant risks which are contained in papers were
 13 merely marked for noting -- so, for example, litigation
 14 reports were marked for noting on your watch; you accept
 15 that?
 16 **A.** Yes, but that is not, in my opinion, Mr Henry -- and
 17 I don't want to, you know, seem in any way
 18 argumentative -- we knew where we had claims. We knew
 19 what the value of those claims were, we knew how much
 20 cash we had to reserve against those claims. We didn't
 21 shy away from that. What we were told is that this is
 22 a small number of claims, the likelihood of success --
 23 I think the word that was used was "remote". This was
 24 a gathering, gathering storm, I would say. And when we
 25 activated the risk management system to at least surface
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1 to claims. We had lots of claims. In fact, I think
 2 £75 million was assigned to -- in one report that I saw.
 3 So I think this was a complete mischaracterisation
 4 of this horrible, horrible situation. And, of course,
 5 the longer that situations like this go on, you know,
 6 the worse it is for the poor people whose lives are
 7 being ruined and also for the corporation who's, you
 8 know, needing to be able to turn the page and -- I'll
 9 stop there.
 10 **Q.** Can we go to the Ismay Report. You've got no
 11 recollection of the Ismay Report?
 12 **A.** No.
 13 **Q.** If it had become apparent that the Ismay Report was
 14 a complete whitewash, that presumably, again, would have
 15 been something that would have disrupted the separation
 16 and flotation?
 17 **A.** No, I don't think so, because if -- you know, as I said,
 18 we had lots of claims. We had lots of technology risk.
 19 The entire technology estate of the Royal Mail Group was
 20 needing a complete revamping. So -- and our whole
 21 approach was we will just start --
 22 **Q.** You'll just deal with it?
 23 **A.** We'll deal with it.
 24 **Q.** But you were, again, misled? Now, are you sure that you
 25 have absolutely nothing to do with the commission of the
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1 it, the way in which it was described was a gross
 2 understatement of what it was.
 3 **Q.** I'm going to come to that but, now that you have raised
 4 it, paragraph 137 of your statement -- no need to take
 5 you to it -- but you said:
 6 "Prior to separation, as I have explained above, the
 7 narrative had focused on the audit preparedness of
 8 Fujitsu, the small number of threatened claims by
 9 subpostmasters and the insistence that Horizon was not
 10 at fault. All of this now appeared to me an entirely
 11 incorrect characterisation of the issues."
 12 Now this was your point of view, however, in
 13 2015/2016. Why didn't you get to grips with it before
 14 separation; you say that you were misled?
 15 **A.** I think we were misled. It certainly wasn't -- it was
 16 the sort of mischaracterisation of a terrible situation,
 17 of a gathering storm. It was a mischaracterisation that
 18 was so great as to be incomprehensible.
 19 **Q.** So how did Mr Triggs mislead you because the reports
 20 that you did not read and the reports notes that were
 21 noted, that he prepared, characterised it in that way?
 22 **A.** But he also said that the likelihood of the Post Office
 23 being liable in these matters was not great, and he had
 24 the advice of a very respected barrister, and so, as
 25 I said, we -- and we didn't shy away from assigning cash
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1 Ismay Report, because the Ismay Report occurred, or
 2 rather it was commissioned -- we have heard from
 3 evidence, and it can be provided to you -- six days
 4 after you assumed your post as CEO of RMG, and that
 5 Mr David Smith commissioned it on 21 July of the year
 6 that you took over, 2010.
 7 Mr Ismay in evidence said that he had about two
 8 weeks to prepare it. Did it have absolutely nothing to
 9 do with your revamping and, as it were, stress testing
 10 of all the systems that had to be dealt with in order to
 11 meet the FCA eligibility requirements?
 12 **A.** Absolutely nothing.
 13 **Q.** Thank you.
 14 **A.** I only learned about how bad was our technology state
 15 much later.
 16 **Q.** Now, can I go to one final thing before I close, and
 17 this is a document that Mr Stevens took you to. It's
 18 POL00030217.
 19 You'll remember this is dealing with the Ernst &
 20 Young report from 27 March 2011, and you were saying to
 21 Mr Stevens that, essentially, the complexion was that
 22 Fujitsu weren't prepared for the audit. In other words,
 23 somehow or other, the message about remote access got
 24 spun or laundered to be about Fujitsu's audit
 25 preparedness, rather than this red flag which exists in
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1 the report.
 2 It's your paragraph 73, in your witness statement,
 3 where you say that, even if you had read it, you
 4 wouldn't have regarded it as creating a problem with
 5 Horizon, because you just thought that it was to do
 6 with, as it were, hygiene concerning access.
 7 Mr Stevens took you to page 33 of the report. Can
 8 we go to the internal pagination, page 34. Could we go,
 9 top left-hand -- yes -- and top box:
 10 "Admin access parameter ADM", et cetera, et cetera,
 11 et cetera.
 12 I'm going to omit words and go down to the last six
 13 lines:
 14 "Unrestricted access to privileged IT functions
 15 increases the risk of unauthorised/inappropriate access
 16 which may lead to the processing or unauthorised or
 17 erroneous transactions."
 18 For prosecutions that were predicated on the
 19 integrity of the Horizon system, that was clearly a risk
 20 that ought to have been drawn to your attention there
 21 and then; do you agree?
 22 **A.** I guess so, if it had been put together the way you just
 23 have done.
 24 **Q.** But it's there in black and white.
 25 **A.** Well, it is. It's part of a much larger document,
 197

1 **Q.** I'm going to stop you there because you have referred to
 2 them -- it's POL00029114, POL00030482 -- again, neither
 3 of which you claim to have seen or read, even though
 4 you're on the circulation list, the Internal Audit
 5 Review of Horizon.
 6 **A.** But -- that is true, Mr Henry.
 7 **Q.** I mean, the fact is this was never bottomed out or
 8 resolved under your leadership before separation, was
 9 it?
 10 **A.** I don't think that's correct. If you look at the work
 11 that had been done, the follow-up work that had been
 12 done by Derek Foster in the Internal Audit Group, it's
 13 a very detailed piece of work. He set in place, in the
 14 Post Office, a group that was charged with managing
 15 every single item that had been raised in that
 16 management letter, and progress was reported on
 17 a regular basis. So I must say, I cannot agree with you
 18 there. Even -- I did not have the primary
 19 responsibility with the External Audit Group. That was,
 20 of course, our Chief Financial Officer, but that does
 21 not mean that -- the work that had been identified here.
 22 And in fact, if you go to the audit plan of E&Y for
 23 the following year, where they talk about how they are
 24 going to approach a very extensive piece of work,
 25 because now they have to present financials for the two
 199

1 Mr Henry. But yes, I think it should have been drawn to
 2 our attention.
 3 **Q.** It's actually in the executive summary on page 3, one of
 4 the opening lines of the document. You had to
 5 strengthen the review of privileged access; do you see?
 6 It's four lines from the bottom of the page:
 7 "Strengthen the review of privileged access."
 8 I mean, it ought to have been staring you, Dame
 9 Moya, in the face, and you ought to have got a grip on
 10 it.
 11 **A.** I must say, I can understand why you would take that
 12 point of view. I would only ask you to consider the
 13 following: it was in the context of our outside auditor
 14 telling us that they had themselves -- despite the
 15 failures of Fujitsu in getting themselves properly
 16 prepared to do a financial year-end close-up, that they
 17 had themselves tested the systems and that they had
 18 found that the systems were reliable and that there was
 19 no integrity of data problem.
 20 Secondly, in response to what had happened in the
 21 2010/2011 audit, where they had had to do more work and
 22 they were very put out about that, and it had cost more
 23 money and had been inefficient -- in addition to that,
 24 in response, we had set in place with Post Office
 25 Limited a whole follow-up piece of work.
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1 companies, you will see that they have put in place
 2 measures where they would use their own software to test
 3 every single aspect of the systems that would relate to
 4 the reporting of data, whether in the Post Office or in
 5 Royal Mail.
 6 So I can understand how you would take the position
 7 that you have taken but I would ask you to consider
 8 those matters.
 9 **MR HENRY:** Dame Moya, I have nothing further to ask you.
 10 Thank you for answering my questions.
 11 **MR STEVENS:** Sir, Ms Patrick has actually asked, as well,
 12 for five minutes. I said before to her about asking
 13 this question and I think it's my error,
 14 misunderstanding.
 15 **SIR WYN WILLIAMS:** Well, Ms Patrick, I don't want to stop
 16 you, obviously, but is it something that's going to the
 17 heart of the problems that I have or is it peripheral,
 18 do you think?
 19 **MS PATRICK:** Sir, it's simply something that Dame Moya has
 20 raised herself about her reaction to Mr Arbuthnot's
 21 letter.
 22 I'd like to pick up some correspondence on behalf of
 23 Mr Julian Wilson that was sent shortly thereafter.
 24 **SIR WYN WILLIAMS:** Yes, all right.
 25 **Questioned by MS PATRICK**
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1 **MS PATRICK:** Dame Moya, I'm going to take this as quickly as
2 I possibly can.

3 I represent some other subpostmasters who were
4 convicted and had their convictions overturned,
5 including Mr Trousdale, who sits on my right, and
6 Ms Hamilton, on my left.

7 Before I go on with the question I have, Mr Stevens
8 raised with you the involvement of Royal Mail Group and
9 Royal Mail Group Legal in prosecutions pre-separation.
10 Can you help us: who was responsible, at Executive level
11 or Board level, for oversight of the Legal Team in Royal
12 Mail Group?

13 **A.** The General Counsel.

14 **Q.** Who did the General Counsel report to?

15 **A.** Me.

16 **Q.** Thank you. Turning to the questions that I wanted to
17 address, the Inquiry is very familiar with Mr Wilson,
18 Mr Julian Wilson. His wife, Mrs Karen Wilson, is a Core
19 Participant. Mr Wilson died before his conviction could
20 be overturned in 2021 and she gave very powerful
21 evidence in Phase 1 as to the human impact on him of his
22 conviction. He'd been actively, very actively, involved
23 in the Justice for Subpostmasters Group before his
24 death.

25 Now, I don't want to take this too slowly. A number
201

1 you see that there?

2 **A.** I can.

3 **Q.** He is raising three questions about the appointment:
4 whether it's independent; whether they're going to look
5 first at the computer because he's saying he thinks
6 that's the problem; and, finally, he raises a specific
7 point about whether the independent review is going to
8 raise a particular issue about transaction management.
9 Can you see that there, Dame Moya?

10 **A.** Yes.

11 **Q.** So they're all questions about the independent review.
12 I think you've said that, by this time, you were all for
13 a drains-up, root-and-branch review. Dame Moya, you're
14 nodding. I have to say, you have to say for the --

15 **A.** I beg your pardon. Yes.

16 **Q.** So you were all for, by this point, root-and-branch
17 independent review, and that's what you were suggesting
18 to Mrs Vennells?

19 **A.** Yes.

20 **Q.** Now, can we look at the reply very quickly. The reply
21 you can see at POL00143463 and it doesn't come from you.
22 In your witness statement you say you can't recall if
23 you saw a reply --

24 **A.** No.

25 **Q.** -- is that right?

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1 of our clients were prosecuted pre-separation and the
2 Inquiry has the documents. Mr Wilson's investigation
3 and trial documents appear under a Royal Mail Group
4 banner.

5 Now, you've talked about the correspondence with
6 Mr Arbuthnot and that changing your perception, and the
7 34 cases being particularly relevant to you. Now, in
8 your witness statement, you also deal with a letter
9 being received from Mrs Karen Lumley MP, on behalf of
10 Mr Julian Wilson -- and we won't turn it up; it's
11 paragraphs 127 and 128 of your witness statement. You
12 have said you can't recall seeing that correspondence.

13 If we turn it up very quickly, it's POL00058098.
14 It'll come up. While it's coming up, the date on it, if
15 you recall, was July 2012, so, after you've seen the
16 letter from Mr Arbuthnot; is that fair, Dame Moya?

17 **A.** Yes. I think the letter -- the date there was December
18 2011; was that correct?

19 **Q.** Yes, so after your perception might have changed about
20 these repeated claims.

21 Now, if we turn to page 2, we'll see Mr Wilson's
22 original message, and I know you've had a chance to look
23 at this in preparation for today. You can read it
24 yourself very briefly but he's reacting to the
25 appointment of an independent forensic accountant; can
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1 Now, it's very similar -- if we scroll through the
2 reply when it comes up -- to a lot of correspondence the
3 Inquiry has seen in reply to subpostmaster messages.
4 It's POL00143463. Thank you very much.

5 We can take it very quickly, I think. If we scan
6 through, you can see the first few paragraphs. It's
7 responding to the MP's message. You'll be aware the
8 email deals with the independent review. Third
9 paragraph: has been appointed, the scope of the
10 investigation is yet to be finalised:

11 "To ensure impartiality, Mr Arbuthnot has reviewed
12 and approved the appointment."

13 Then, I won't look at the detail, but if we can
14 scroll through the next four paragraphs, it's dealing
15 with the specific thing he asked the independent
16 reviewer to consider and, if we scroll to the last of
17 the three paragraphs there, it ends with:

18 "Interruptions to service connections do not create
19 an issue for the Horizon system.

20 "Over the past ten years, many millions of branch
21 reconciliations have been carried out by 25,000
22 subpostmasters and their staff in Post Office branches
23 and transactions and balances accurately recorded. We
24 continue to have absolute confidence in the robustness
25 and integrity of the Horizon system, and our branch
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1 accounting processes."
 2 Dame Moya, if you had seen this reply, it's going
 3 out to bat for the Post Office again, isn't it?
 4 **A.** Sorry? I didn't catch that.
 5 **Q.** It's going out to bat for the system again, isn't it;
 6 it's saying the system is fine?
 7 **A.** I agree.
 8 **Q.** If you had seen this, after your perception had changed,
 9 having seen the James Arbuthnot letter, would you have
 10 been happy with this response going out in reply to
 11 a letter to you?
 12 **A.** No.
 13 **Q.** Now, this is after you've seen the Arbuthnot letter.
 14 You know this correspondence, I assume, had come in. Do
 15 you see correspondence that comes to you?
 16 **A.** Not necessarily. Oftentimes, it is handled by the
 17 Executive Correspondence Teams in Royal Mail and in Post
 18 Office.
 19 **Q.** Well, let's put that to one side. He's writing to you
 20 as the Chief -- well, he's written to his MP and his MP
 21 has directed to you as the parent, at the time he was
 22 investigated.
 23 Now, Mr Wilson aside, having had your perception
 24 changed by the James Arbuthnot letter and knowing that
 25 Royal Mail Group had been the Post Office parent for
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1 **A.** No.
 2 **MS PATRICK:** Thank you.
 3 Sorry, sir, there was no implication --
 4 **SIR WYN WILLIAMS:** I just wanted to be clear, that's all,
 5 about the sequence. I am now. Thank you.
 6 **MS PATRICK:** Thank you, sir.
 7 Thank you, Dame Moya. I have no other questions.
 8 **MR STEVENS:** Sir, we have also received a request from Dame
 9 Moya's recognised legal representative to take a point
 10 of clarification in re-examination. It's a short point.
 11 **MR BENWELL:** I'm aware we are under pressure of time. It's
 12 just a very short point.
 13 **SIR WYN WILLIAMS:** Yes.
 14 **Questioned by MR BENWELL**
 15 **MR BENWELL:** Could we bring up Rob Wilson's witness
 16 statement, please, which is WITN04210100, and if we
 17 could go to page 2 of that document, please.
 18 While that comes up, Dame Moya, you'll remember that
 19 Mr Stevens raised the question as to the entity which
 20 employed Rob Wilson and his role, and that that point
 21 has been come back to on a number of occasions.
 22 Perhaps I could just take you to paragraph 3 of his
 23 statement, the first sentence. He says:
 24 "In May 2002 I was appointed head of the POL CLT",
 25 which I think is the Criminal Law Team.
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1 a very long time, did you ever look back and think "What
 2 were we doing; did we have any role in this"?
 3 **A.** I never asked that question, but I did ask questions,
 4 going forward. But at that point, you know, we were
 5 brushed aside, and I think the evidence that has been
 6 provided to me in my bundles show that.
 7 **Q.** Dame Moya, you asked questions but today, in response to
 8 questions from Mr Stevens, you didn't know that Royal
 9 Mail Group Legal had been in the thick of these
 10 prosecutions?
 11 **A.** I thought it was the Post Office Legal Team.
 12 **MS PATRICK:** Okay. Dame Moya --
 13 **SIR WYN WILLIAMS:** Who signed that letter? I can't see on
 14 the screen.
 15 **MS PATRICK:** Sir, it's not Dame Moya. It's executive
 16 correspondence.
 17 **SIR WYN WILLIAMS:** Well, I appreciate that.
 18 **MS PATRICK:** Donna Gilhooly, sir.
 19 **SIR WYN WILLIAMS:** Yes, so it is an answer by Royal Mail
 20 because, by now, of course, separation has occurred,
 21 hasn't it?
 22 **A.** Yes. No, this is not Royal Mail, I don't think. I'm
 23 not sure. It might be the Post Office.
 24 **MS PATRICK:** That's why I suggested, Dame Moya, if you had
 25 seen it, would you have agreed with it?
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1 Then, about five lines down in that same paragraph,
 2 he says:
 3 "My main role was the responsibility for all
 4 criminal prosecutions brought on behalf of [Post Office
 5 Limited]."
 6 Then perhaps we could scroll on to paragraph 4 of
 7 that same statement, please, on the next page, where
 8 Mr Wilson says:
 9 "On 1 April 2012 [so at separation] I left [Post
 10 Office Limited] and moved into Royal Mail."
 11 So obviously we don't have his employment contract
 12 but we do have his statement which says that, and
 13 I wanted to draw that to the Inquiry's attention.
 14 Obviously, Dame Moya may want to comment on that but
 15 that may not be necessary.
 16 **A.** No, I --
 17 **SIR WYN WILLIAMS:** Well, I think I was aware of Mr Wilson's
 18 statement and I am also aware that, during the course of
 19 the Inquiry, there has been a degree of looseness -- if
 20 I can put it in that way -- about precisely who worked
 21 for whom, when.
 22 **MR BENWELL:** Thank you.
 23 **SIR WYN WILLIAMS:** Right, Mr Stevens. Is that it?
 24 **MR STEVENS:** Yes. That's all the questions, yes.
 25 **SIR WYN WILLIAMS:** I'm very grateful to you, Dame Moya, for
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1 making your witness statement and for giving evidence
 2 before me orally and answering a great many questions.
 3 Thank you again.

4 **THE WITNESS:** Thank you, sir.

5 **SIR WYN WILLIAMS:** Right. We will resume on Tuesday,
 6 Mr Stevens?

7 **MR STEVENS:** Yes, sir, thank you.

8 (4.23 pm)

9 (The hearing adjourned until 9.45 am
 10 On Tuesday, 23 July 2024)

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