1 Tuesday, 23 July 2024

2 (9.45 am)

- 3 MR BEER: Good morning, sir. Can you see and hear us?
- 4 SIR WYN WILLIAMS: Yes, thank you very much.
- 5 **MR BEER:** Thank you. May I call Baroness Neville-Rolfe

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with it?

7 SIR WYN WILLIAMS: Of course.

BARONESS LUCY NEVILLE-ROLFE (sworn)

Questioned by MR BEER

MR BEER: Good morning, my name is Jason Beer and I askquestions on behalf of the Inquiry. Can you tell us

12 your full name, please?

- 13 A. Baroness Lucy Neville-Rolfe.
- 14 Q. Thank you. You've kindly made a witness statement.
- 15 It's 72 pages long and is dated 26 June 2024. Can we
- look at that, please. It's WITN10200100. Can you turn
- to page 72, please; is that your signature?
- 18 A. It is indeed, yes.
- 19 Q. Are the contents of your witness statement true to the20 best of your knowledge and belief?
- 21 A. The contents are true. It was signed on 26 June when
- 22 I was a Government Minister in the Cabinet Office. I'm
- 23 now an opposition Member of the House of Lords.
- 24 **Q.** Yes, thank you. By way of background, I think you were
- a civil servant for 24 years between 1973 and 1997; is

Q. I'm going to address matters chronologically, if I may, as you've done in the first part of your witness statement, rather than thematically, because hopefully, in this way, we will explore all of the themes as they arise across the 14-month period.

Can I start, however, with a high-level summary of the entirety of your time in office. It's my summary and I want to know from you whether I've got it right. I'm going to split it into four stages or four periods. That may be somewhat artificial, as there was, I think, no neat dividing line in the four stages, no "lightbulb moments", as you say in your witness statement, and the issues appear to have been evolving or developing for you.

But is this right: the first period of time, stage one, lasted from appointment in mid-May 2015, until a meeting with MPs and the Post Office in mid-July 2015, and this period, would this be right, would be marked by you being provided with information, principally by ShEx, which information suggested that it was established Government policy that Government maintained an arm's-length approach to the Post Office, that Horizon had been independently and extensively investigated and that no systemic faults had been found

1 that right?

2 A. Yes.

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- 3 Q. Holding positions, amongst others, as a private
 - secretary, a member of the Prime Minister's Policy Unit
- 5 in Number 10, and then as a director in the Deregulation
- 6 Unit in the then DTI.
- 7 **A.** Yes.
- 8 Q. You then worked in the second stage of your career in
- 9 the private sector, holding positions as a company
- 10 secretary, a board member and as a NED, a Non-Executive
- 11 Director, including in FTSE-listed companies; is that
- 12 right?
- 13 A. That's correct. I was an Executive Director at Tesco
- for 15 and a half years and then I also had
- 15 non-executive roles, at various times.
- 16 Q. Then, thirdly, you were made a Member of the House of
- 17 Lords in 2013, and from 2014 until 2017, you were
- a Government minister in variously the Business, Culture
- 19 and Treasury Departments?
- 20 A. Correct.
- 21 Q. You held ministerial responsibility for postal affairs,
- 22 is this right, between 12 May 2015 and 13 July 2016?
- 23 A. Correct.
- 24 Q. So a period of 14 months?
- 25 A. Correct.

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- 1 A. I think that's a fair summary. I mean there was also
- 2 Criminal Cases Review Commission work into cases that
- 3 people were worried about.
- 4 Q. This first stage was marked by you finding that
 - information, reassuring and acting in reliance on it?
- 6 A. I think that's largely true, yes.
- 7 Q. Accordingly, at this early stage, you followed the
 - orthodox line that you had essentially inherited as part
- 9 of Government policy?
- 10 A. Yes, to the extent I was writing letters to MPs, for
- 11 example. But, obviously, I was aware that there were
- 12 murmurings, especially amongst a few MPs who had
- 13 particularly troublesome cases, like Mrs Hamilton --
- I think the Ms Hamilton case and that was one of the
 reasons I was very pleased that I was going to have
- a meeting with MPs to discuss some of that.
- 17 **Q.** Thank you. Then stage two, as I am going to call it, from mid-July 2015, your faith in ShEx's advice was
- from mid-July 2015, your faith in ShEx's advice was beginning to wane and this led to a desire in you to
- beginning to wane and this led to a desire in you to
 hear from different voices and for more independent
- 21 scrutiny of the Horizon issues to be undertaken than had
- 22 been offered by ShEx to date; is that fair?
- 23 A. That is fair, and I was also in receipt of advice --
- 24 there was this Second Sight Report that was sent to me
- by one of the MPs and I was in receipt of advice from

- 1 ShEx on that, which I was troubled by because it seemed 2 to be a very cursory summary of what looked like a very
- 3 long, complicated report, which I obviously had
- 4 difficulty in understanding the ins and outs of.
- 5 Then stage three, from about September onwards, you took
- 6 the view that ShEx were failing to carry into effect
- 7 your wishes and, to an extent, seemed to be working
- 8 against you?
- 9 A. I think that came a bit earlier, to be honest. I was
- 10 worried in August that I wasn't getting broad enough
- 11 advice, I tried to get in officials, without success,
- 12 from the Department more broadly, and I also then asked
- 13 the new chair, Tim Parker, of the -- of POL, to take
- 14 a fresh look and undertake an independent review of all
- 15 of this. So that was actually in the August period.
- 16 But, obviously, it was carried through later. I mean,
- 17 in Government things take more time than in the private
- 18 sector.
- 19 Q. Lastly, you determined that the only way forwards was to
- 20 secure some form of independent investigation into the
- 21 Horizon issues?
- 22 A. That's correct, yes, and the question was how could one
- 23 get this extra work done, recognising that there were
- 24 arguments on both sides, of course, because I was being
- 25 told in all directions that, actually, there wasn't
- 1 particularly on individual cases, but I was looking to
 - them for, obviously, the kind of independent, objective
- 3 advice that, as a former civil servant, I knew was the
- 4 job of civil servants.

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- 5 Q. Thank you. With that overview in mind, can we start
- 6 with your appointment and initial briefing. I think
- 7 it's right that you were aware, even before you took up
- 8 the postal affairs brief, that concerns had been raised
- 9 by some MPs about the Horizon issue and that that issue
 - had been raised in Parliament; is that right?
- 11 A. That is right and there'd been a debate, and I'd --
- 12 there'd been a piece of correspondence I had, which
- 13 I had got in my bundle originally, about making
- 14 a statement about mediation, which I'm not sure was
- 15 whether it was eventually made, but the convention is
- 16 that, if a statement is made by a Minister in the House
- 17 of Commons, it's then repeated routinely in the House of
- 18 Lords. Although one doesn't have any influence over the
- 19 content, obviously one's name is put to it. So, out of
- 20 courtesy, it's sent to you to have a look at. So I was
- 21 aware of that.
- 22 Q. So that prior knowledge led you, I think, upon receipt
- 23 of information from the Secretary of State as to the
- 24 range of your portfolio and the fact that it would
- 25 include postal affairs, to seek an early meeting about

- 1 really an issue, there was no systemic problem with
- 2 Horizon, and so on. So I was trying to find a way
- 3 through to get some further work done because I just
- 4 couldn't believe that these people, who would be
- 5 seemingly sort of honest, respectable people, were, you
- 6 know -- so many of them had been prosecuted and that's
- 7 what the MPs had been telling me.
- 8 Q. You were engaged, in relation to the Post Office, for
- 9 a relatively short period of time, 14 months, whilst you
- 10 held this ministerial brief but, would this be right,
- 11 you were concerned by the apparent approach of ShEx
- 12 officials to align their position very closely with that
- 13 of the Post Office, rather than exercising
- 14 an independent function?
- 15 A. Yeah, I think I came to that view gradually because they
- 16 were obviously departmental officials, albeit slightly
- 17 separate because they were in this thing called the
- 18 Shareholder Executive, and I -- in fact, Laura Thompson,
- 19 who was my main official advice, she seemed, you know,
- 20 quite like the other officials who worked for me,
- 21 sounded very satisfactory in other areas, and, you know,
- 22 she advised me in the classic way.

I didn't really realise until later how coordinated that was with the Post Office. Obviously, they needed

to go to the Post Office to find out the facts,

- 1 the problems with the Horizon IT System; is that right?
- 2 A. That's correct, yes.
- 3 Q. Can we look at that, please. It will come up on the
- 4 screen for you. You can probably put that witness
- 5 statement to one side now because I won't be referring
- 6 to it very often. It will come up on the screen,
- 7 WITN10200101.
- 8 If we can go to page 2, please, and scroll down,
- 9 an email to -- and can you help us -- the email address
- 10 is "Neville-Rolfe MPST-OLD". An email sent to that
- 11 email address, where would that go to in relation to
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- 13 A. I mean, that's the private office address so all your
- 14 private secretaries have access to that.
- 15 Q. So we shouldn't take any email that's to "Neville-Rolfe
- 16 MPST" as being an email that went directly and
- 17 personally to you?
- A. Correct. 18
- 19 Is it right that you would see some of these emails if
- 20 private office chose to forward them to you or to print
- 21 them and put them in front of you?
- 22 A. Exactly.
- 23 Q. Hannah Wiskin, the PPS to the Secretary of State says:
- 24 "The Secretary of State has considered carefully the 25
 - [portfolios] across BIS and has decided on the policy

areas [that are] contained in the attached."

If we go to page 1, please, a reply from your private office, if we just scroll down, we can see it's from Harriet Smith. Did you have more than one private secretary?

A. She was the main one but there's a guy called Andrew who also features, who was the sort of number 2.

Q. Okay, so from your private secretary:

Hannah.

"The Minister is broadly content -- she has commented as follows", and then about the fifth paragraph down:

"The Post Office brief is troubling and I would like an early meeting on the problems with the Horizon System ..."

Just stopping there, does this look, therefore, like text that has been cut into the email by your private secretary Harriet, through the use of the word "I"?

A. Yes, it does. Most likely, I've written that in manuscript on a document that she'd sent me. One of the problems about this particular Inquiry is that there isn't any proper paperwork on the private office. This has been preserved, no doubt, because it came from the Secretary of State's office but I don't think most of the notes of my meetings and the submissions that came

would sit as between the Commons and the Lords, ie who will actually be speaking in the Commons, or was it a deeper issue you were raising than that?

A. I think there were couple of things happening here.

I think there were couple of things happening here. First of all, I'm being allocated my portfolios, some of which I was already doing, which were quite busy, and obviously the Bills that I had to do, I don't think, are mentioned here, perhaps maybe they're in an annexe. Secondly, I knew that taking the Post Office portfolio wasn't without difficulty. I've recorded that. And then for good order, I needed to know who would be answering if there were a commons debate, for example.

It turned out to be Minister Freeman, in due course. I was always on to this point because I had to answer in the Lords for all my other colleagues, that's one of the sort of challenges of being a Lords minister, just the sheer scale of work you have to do, which is not in areas that you're responsible for.

19 Q. I think at the end of the month, at the end of May, you
 20 had an introductory meeting with members of ShEx --

21 A. Yeah.

22 Q. -- and that was ahead of a meeting specifically about
 23 the Post Office on the 2 June 2015. I think you've got
 24 a background briefing. Can we turn that up, please.
 25 Firstly, the covering email -- UKGI0004415 -- 29 May

and what I wrote on them, none of that seems to be available.

It must have all got thrown away at some point but this looks very much like what I said and then I made this point that obviously I know that Post Office closures were a worry because we dealt with those when I -- when some of the post offices -- as part of transition, some of the post offices were coming into our neighbourhood stores, which, I mean, was a positive, to be honest.

11 Q. So you say:

"The Post Office brief is troubling and I would like an early meeting on the problems with the Horizon IT system and the losses people are complaining about. This will be a Parliamentary issue and it would be good to know who will answer on postal matters in the Commons. I dealt with Post Office closures a few years ago at Tesco and it was very problematic with local MPs including David Cameron -- whom luckily we were able to help!"

So this is 18 May, within six days of you taking up office; is that right?

23 A. That's right, yes.

Q. The purpose of this part of the email here, was itsimply to work out where the Parliamentary business

from Laura Thompson and, as you've said already, she was your principal contact, is this right, within ShEx?

3 A. Yes

Q. To your private office, with the subject of "Briefing
 for Baroness Neville-Rolfe" again, "ahead of
 introductory meeting on Post Office":

"... please find attached some background briefing for [you] ahead of [your] introductory meeting on Tuesday of next week."

Can we turn to the briefing itself, UKGl00004416.

This is page 1 of the attachment. It's a 28-page document and we can't do it justice by going through all 28 pages here. I think you say in your witness statement that, overall, you found this to be a well prepared, clear and helpful briefing?

16 A. Correct.

17 Q. Can we look, please, at page 2. This is the first
18 substantive page and is essentially an executive
19 summary. If we look at the last paragraph on that page,
20 it says:

"A small but vocal number of mostly former subpostmasters have raised concerns about [Post Office's] Horizon IT System, which they claim has caused their businesses losses. Over two years' worth of independent investigation has found no systemic faults

1 in Horizon and there is a mediation scheme to consider 2 individual cases, but campaigning and media interest 3 persists and BBC's Panorama is due to broadcast 4 a programme on this on 22 June. See slide 13." 5 If we, just before we go to slide 13, look at 6

page 3, please. Do you see in the bottom left-hand side of that slide, in bold italics the last entry:

"Government does not seek to influence [Post Office's] day-to-day operations."

Have you got that?

That's it.

- A. Yeah, thanks. 12
- 13 Maybe, if we can just look at that in context we can see 14 it's essentially a running summary.
- 15 Α. Yeah.

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- 16 Q. Was that the orthodoxy that ShEx told you was the 17 essential operating position?
- 18 A. I think they explained, as I probably already knew, that 19 it was at arm's length, and we tried not to interfere
- 20 because we were trying to make them behave commercially 21 and that was how the model worked, and it followed from
- 22 that that we weren't influencing day-to-day operations.
- 23 I mean, that didn't rule out them asking many -- if you
- 24 look further on in the document, there's a sort of
- 25 programme of things that I should do as a new minister 13

former) subpostmasters about the ... system, in 2012 the Post Office commissioned an independent firm, Second Sight, to examine the system for systemic laws that could cause accounting discrepancies.

"Second Sight's Interim Report, published in July 2013, and the final report published in April 2015, both make clear that there is [and this is underlined] no evidence of system-wide problems with Horizon."

At this time, did you have a copy of either the Interim Report or the final report that are mentioned here?

- 12 A. I don't think so.
- 13 **Q.** Therefore, did you rely on what was said; in particular, 14 did you rely on what we know to be a false statement 15 that the final report makes it clear that there was no 16 evidence of system-wide problems in Horizon?
- 17 A. Yeah, obviously, I believed that and that was -- that 18 line was -- continued to be taken for some months by ShEx and, no doubt, the Post Office. 19
- 20 Q. At this point you had no information or material to know
- 22 to the final report?
- 23 A. No, and if you look at the pack, you know, it looks 24 considered, they've gone through the various things that 25

that that was a false statement, insofar as it applied

are going on. I mean, it looks orderly and well 15

for the Post Office and I think that included --1

2 certainly I made, you know, visits to post offices on

3 visibility. So but the day-to-day operations, how

4 things run, what the IT system did, you know, which post

5 offices you closed, how rapidly we transformed from the

6 old model to the new model, they regard that as a matter

for the Post Office. And I mean I supported that, as 7

8 I think I've said in my statement, that there can be

9 a lot of merit in allowing, you know, people to get on

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11 Q. I think you say in your witness statement that the model 12 of an arm's-length body operation with Government is not 13 inherently defective but it depends on the honesty and 14 reliability and competency of the people operating it?

15 A. It does, people on both sides, yeah.

16 Q. Can we go to slide 13, which is on page 14, please. 17 This is the slide concerning the Horizon system and the

18 Mediation Scheme. On the left-hand side, it records 19

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"There has been over two years of independent scrutiny of [the] system and no evidence of systemic flaws has been found."

Then in the body of the text, if we look at the first paragraph:

"Following complaints from a small number of (mostly

1 organised.

- 2 Q. The rest of the slide concerns the Mediation Scheme?
- 3 A.
- 4 Q. I am going to take that as read.

5 I think you asked for a further briefing 6 specifically concerning Horizon; is that right?

7 A. Yes.

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8 Q. Why was that?

A. I think it probably dated back to that original exchange 9 that we looked at, you remember, that I had known on 10 11 appointment that Horizon was a problem area and so I --

12 and I think it was -- I felt that it was a slightly

13 different subject to the sort of commercial and

14 transformational issues that are looked at, at the rest

15 of the pack. So it made sense to have a separate

session and I wanted a bit more information. I think

17 they sent me a longer submission.

18 Q. We're going to look at that now, UKGI00004453. This is 19 the longer submission, dated 2 June 2015. It is

20 a six-odd page document. So the fuller briefing about

21 the Post Office generally was dated 29 May. We're now

on 2 June. The "Purpose" of this document is recorded 22

23 to be a "Further briefing on the Post Office Horizon IT

24 System and associated Mediation Scheme, and seeking your

25 views on handling this matter in future", with

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(4) Pages 13 - 16

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a recommendation that you firstly note the briefing; secondly, that you agree that Government should maintain distance from this matter and resist calls for further independent investigation; and, thirdly, that you agree that officials, rather than ministers, should respond to future correspondence from the JFSA.

Do you, as well as obviously noting the briefing, agree those two recommendations, essentially? A. I mean, I think certainly the third one, a letter went off to Sir Alan Bates from an official. So, implicitly, it's clear that I did agree that, and I think it would fit in with my general approach. You have to look at it in the context of how many portfolios I've got and therefore how much correspondence and requests -- it was a request for a meeting, I think, and I -- my general approach was to see -- if MPs asked to see me, then I would try and have an MP or a fellow peer, and if the Department recommended a meeting, particularly if it was from somebody like a trade union, then I would try and

I was advised, I think -- you'd have to go elsewhere in this document -- that Justice for Subpostmasters weren't sort of the equivalent of an accredited trade association/state trade union, that they were individuals and, therefore, I agreed that it made sense,

1 within the spirit of how we organised correspondence, 2 for that to go from officials.

Q. Can we look at the substance of the briefing, then, paragraph 2:

> "[Post Office] commissioned an independent firm of forensic accountants, Second Sight, to examine the system for evidence of systemic laws which could cause accounting discrepancies. Their initial report (in June 2013) found no evidence of systemic flaws that could cause the issues raised. The report did find that in some cases [Post Office] could have provided more training and support to subpostmasters, and [Post Office] have since made changes to address these. [Post Office] also established a mediation scheme and invited current and former subpostmasters to come forward ..."

Then, in paragraph 3, there's some numbers given --136 applicants versus an estimated 68,000 users in 11,700 branches -- and:

"The vast majority of subpostmasters are using Horizon effectively every day."

Was that a series of statements that ShEx officials made regularly to you: a comparison of the number of people who had come forwards, either to JFSA or through the Mediation Scheme, against the balance of users who were operating the system, it was said, effectively

1 every day.

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- A. Yes, certainly, they'd put the numbers in context, but of course the Mediation Scheme was set up because there were sort of acute problems in a few cases. So it's important context but not definitive.
- Q. Paragraph 4:

"... Second Sight began their investigations in 2012, producing their initial report in June 2013 and their final report in April 2015. They've also undertaken separate investigations into each of the 136 cases in the scheme. There has therefore been over two years of independent scrutiny and in that time no evidence of systemic flaws in Horizon has been found."

Then, if we go forwards to paragraph 7:

"Despite JFSA's complaints and calls for a new investigation, it is our strong recommendation that Government should maintain the position that this is not a matter for Government, and increase our distance from the matter ... attempts to prolong this matter do damage to [Post Office's] brand and cost [Post Office] significant amounts of money in funding Second Sight and operating the Mediation Scheme. We also recommend that Government should resist any calls for further investigation -- the matter has been comprehensively investigated over several years and the complaints of

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JFSA have borne no fruit. Reinvestigation would be neither value for money nor in the public interest ..."

Then it's repeated, I think, for the third time: "There is no evidence of systemic flaws in Horizon ..." Second bullet point:

"There is no evidence that any of [Post Office's] prosecutions against subpostmasters for either false accounting or theft are unsafe. [Post Office] has got a duty to disclose any new material that comes to light that could support a subpostmaster's defence, and none has emerged."

suggested to you that that was a false statement? A. No, I mean, I knew there were sort of enduring concerns, but I found this reassuring, in that the Criminal Cases Review Commission are looking at applications for review from subpostmasters and that POL has a duty, which obviously I was aware of from my corporate background, to disclose material that comes to light. I mean, that's a very important principle of British justice.

At this time, had you got any material that

20 21 Q. But, in particular, my question was slightly imprecise, 22 the statement that no material -- none -- no material 23 has emerged that could support a subpostmaster's 24 defence. I mean, you now know that, by this time, June

25 2015, much material had emerged within Post Office that

might support a subpostmaster's defence, in particular, you now know, I think, the advice that had been written about the principal expert witness, Gareth Jenkins, that the Post Office had relied on and the Post Office's own conclusion that he had given evidence that was materially misleading and in breach of his duties to the court. At this time, did you know any of that? A. Obviously, I didn't know any of this at this time, This is very strong advice, you know, it's not "on the

Obviously, I didn't know any of this at this time, although I would have pursued, you know, more detail. This is very strong advice, you know, it's not "on the one hand ... on the other". ShEx haven't sought to go, you know, into the detail of the individual cases and explain, you know, what the concerns are. I did ask for material on that, but that was later on in August. We'll come to that in due course. As far as I can see here, there's a very strong advice that there isn't a problem, they looked into it all, there is no evidence, and even if there is and some material comes up, then that's going to be shipped straight off to the Criminal Cases Review Commission.

I mean, that would have been the way I would have read that. Obviously, we're looking back at hindsight at the moment and I was getting this unending and, you know -- you know, always the same advice on all of these points from ShEx.

the process have maintained the confidentiality of all members of the scheme, even where individuals have waived their own anonymity and spoken to the press or where documents have been leaked by [Justice for Subpostmasters Alliance]. There has been some attention on this matter, mostly BBC's The One Show and local news programmes. Subject to taking legal advice [Post Office] are now in favour of taking a more robust approach to handling JFSA, given that it is clear JFSA wish to derail the Mediation Scheme and prevent the final cases from being mediated."

Then lastly paragraph 13, please -- sorry, I should have read paragraph 9:

"We consider that a more robust and proactive approach from [Post Office], together with a more detached stance from Government, would be the right approach to minimise negative press and ensure the scheme can complete its work and close as swiftly as possible ... Are you content with this approach?"

I think you indicated that, in the light of what you were told, you would have been content with that approach?

A. I think there was a -- I mean, obviously I may have read
 this afterwards but the Mediation Scheme had been
 subject to a sift, originally and then I think, as part

Q. Is the point you're making that this, even as a piece of advice, contains no shades of grey: it's very black and white?

4 A. Very black and white yes.

5 Q. No evidence, no evidence, no evidence?

A. Correct, and, you know, these were civil servants. I'd
been a civil servant. You know, you have a duty to be
objective and truthful as a civil servant, so obviously,
you know, Government can't cope if, you know, the civil
servants aren't looking at things, you know, honestly,
which of course they may have been. You know, this is
maybe what -- this is presumably what they believed.

13 Q. Over the page, please. The top bullet point, which
picks up a point you made earlier, Baroness
Neville-Rolfe:

"It is important to note that the [Federation], which is the recognised representative organisation for subpostmasters, does <u>not</u> support JFSA's arguments. The ... General Secretary, George Thomson, has publicly said that he considers JFSA members to be 'trying it on' and there are their complaints are doing damage to subpostmasters' businesses."

Then if we go on to paragraph 8, please:
"To date, [Post Office] have generally sought to
address JFSA's concerns where possible, and throughout

of the closing it all down, anybody who wanted to have mediation could have mediation. So, you know, that looks like an improvement to me.

And on the trying on, which we passed over rapidly,

when I was preparing for today, I discovered that Thomson had actually told the Committee and the Commons that he thought that I think, was it Mr Ridkin (sic) had been trying it on. So there was quite recent evidence, if you like, that no doubt officials were looking at, to say that perhaps, you know, there was some issue. So that's the background to that is.

But, for me, sitting and looking at all of this, coming, I suppose, as you saw when I first got the role, with a little bit of concern, this seemed to be very, as you said, you know, very strong advice.

However, you know, I was a new Minister. I didn't really decide anything definitively. We'd got BBC Panorama coming up and also a debate, perhaps more important, in the House of Commons.

20 Q. If we go over the page, please, to paragraph 13:

"ShEx recommended that correspondence from JFSA is handled at an official level, on the basis that they are not a recognised organisation and that continued direct engagement with ministers will serve to prolong their campaign. We propose to send the response [and there's

a draft letter at annexe C] from our team. If you would prefer to reply personally we can adapt the response to come from you, or (preferably) we can prepare a short response from you politely declining the offer ... Are you content for officials to respond from Mr Bates?"

I think you indicated that, in the light of the draft letter and in the letter out that you've seen, the answer is that you were, at this stage, content for officials to respond?

- 10 A. I felt officials should deal with it. Obviously, 11 I hadn't been given all the background to Mr Bates 12 because, actually -- Sir Alan, as he now is -- had had 13 various sort of interactions with ministers over the 14 years. It would perhaps have been helpful to have known 15 a bit more about that but that isn't in any of the 16 paperwork.
- 17 Q. No. In your --

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- 18 So I obviously wasn't aware of it at that time.
- 19 Thank you. In you witness statement, you rely on, 20 I think, five points to stand up the reasonableness of 21 you relying on the advice given in this submission to 22 you. Can I summarise them and see whether I've got it 23 right.

First, ministers are, as a matter of principle, entitled to rely on the advice of officials and do so on

things, you know, for the post offices, both commercially and for the postmasters --

3 Q. And --

- 4 A. -- and for society because the Post Office -- this is 5 the thing you've got to remember: the Post Office is so 6 important in almost every village in the land.
- 7 Q. Lastly, on the substance, you were informed that there 8 were no systemic problems with the system, despite years 9 of investigation and that the recognised union supported 10 the Post Office and didn't support the subpostmasters?
- 11 A. Correct.
- 12 Q. In the course of the briefing, it's mentioned that the 13 Post Office prosecuted its own subpostmasters and that 14 the CCRC was reviewing some cases. You tell us in your 15 witness statement that you took comfort from the fact 16 that the CCRC was considering some convictions and that 17 Post Office had agreed to preserve documents 18 accordingly. When were you first aware that the Post 19 Office conducted its own prosecutions? 20 A. I think I would have been aware of that probably even
- 21 before I took over because there are various bits of 22 Government -- I mean, private prosecutions can be done 23 by organisations and the Post Office did their own in 24 the same way as something like the DVLA or the RSPCA, 25 which isn't even a Government body.

1 the basis that the advice they are receiving is itself 2 objective and thorough; is that right?

3 A. That's certainly my understanding, my approach, my 4 assumption in dealings with the Civil Service and the 5 Government, yes.

6 **Q.** Secondly, in this case, the author of this document, 7 Laura Thompson, appeared to you to be both competent and 8

A. True. 9

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10 Q. Thirdly, you were new in post and what you were being 11 asked to do was essentially continue what you were 12 advised was an established Government line?

13 True, and that, you know, tends to happen, that you have 14 these established lines which, you know, have gone --15 a lot of work goes into and, as a new junior minister,

16 you know, you inherit those.

17 Q. Fourthly, the very structure that was embedded was one 18 of an arm's-length body which could operate free from 19 political interference and, therefore, the approach

20 suggested was consistent with had embedded position?

21 A. Correct. I mean, I'm not so sure whether that's --22 that's not particularly to do with whether you write to 23 Mr Bates or not but it's my whole approach to the 24 subject, which is to try and allow the Post Office, as 25 well led as we can make it, to get on and improve

1 So you were aware, even before you took up this post, as 2 to the Post Office's private prosecutorial function?

3 A. It isn't something I queried. I mean, I did, in my 4 statement at the end, question it should have continued 5 in quite the way it did once you've moved from a public 6 sector organisation to a more private sector one, but 7 that's a completely different point and perhaps for 8 later. Obviously I knew that they were doing that.

But, obviously, they had a large Legal Department, no doubt inherited from the conglomerate that was originally Royal Mail plus the Post Office, and indeed, I think we'd discovered elsewhere, that they'd recently put in charge a new general counsel, which sounded like a good idea at the time.

15 Q. Did you have any concerns, therefore, that the Post 16 Office that a private prosecution function?

17 A. No, I don't think I'd have concerns in particular at the 18 private prosecution function. Although, with the 19 benefit of hindsight and knowing what I now know, 20 I think it's important that institutions like that --

21 you know, the thing about the -- I'm perhaps

22 anticipating -- but the thing about the CPS when they 23 took over from the police is that the CPS can look in

24 the round at all these cases and say "Is this sensible?"

25 Now, there's no reason why the Post Office couldn't have

done that themselves and you have -- obviously, if you're a prosecutor you have to abide by various codes and behave properly and look at evidence and worry about disclosure. So all of that can be done by the Post Office. But, as I've said elsewhere, once you're a private operation, the incentives are slightly different and so that would be the -- that would be the worry.

But you're asking me, at that time, the fact that they did private prosecutions I noted, I think I knew about it and, in any event, they have got audit committees and all the rest of it to look at, you know, at the progress of legal cases and prosecutions, which I obviously knew about from having been a Non-Executive Director and indeed an Executive Director in lots of companies. The Prosecution Policy is something, you know, that you would routinely take a look at, make sure it was being done properly.

- 19 Q. You're referring to your time in --
- A. At Tesco but also in other companies, where I've sat onthe audit committee.
- 22 Q. Did Tesco have a Prosecution Policy?
- A. We certainly prosecuted quite a low of shoplifters, and
 so on, and we would have -- the Compliance Committee
 would have -- obviously, from time to time, would look
- Q. You mentioned that the -- I think did you say the
 Security Director would come and report to you?
- 3 A. Yes.

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- 4 Q. What would he or she report?
- A. Well, they'd write a paper on these are the things that
 had happened over the last year or six months, or
 whatever the period was, and, you know, we've had X
 prosecutions and successful or unsuccessful, and we've
 nagged away at the Home Office to help a bit more and
 all that sort of stuff.
- 11 Q. Thank you. You tell us -- and you mentioned it a moment
 12 ago -- at paragraph 290 of your witness statement, that
 13 the arrangements allowing the Post Office to pursue
 14 their own prosecutions should have been ended at
 15 privatisation when they ceased to be part of Government:

"Prosecution decisions should be made independently and impartially whereas here there were financial incentives for prosecuting."

Firstly, I take it that's a view that's emerged after your time in office --

21 A. Correct

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- 22 Q. -- in the light of the events which have happened --
- 23 A. Correct.
- Q. -- and been revealed. But, secondly, why do you draw
 the link between the ending of the prosecution function

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at the number of cases and the Security Officer would come and talk to us about that sort of thing.

- Q. Was that a function of Audit and Compliance or Audit andRisk Committee?
- A. We didn't have a Risk Committee, we had an Audit
 Committee, which was made up of Non-Executive Directors,
 but I attended in my capacity as Company Secretary. And
 then we also an Executive Compliance Committee, which
 during the period I was Company Secretary, I used to
 chair. So, you know, I was knowledgeable about that
 sort of thing.
- 12 Q. Just help us, the document can come down from the screen, it may be an interesting point of comparison, what level of scrutiny in a fully private company,
 15 Tesco, was given in that committee to prosecution?
 16 A. I think it would tend to look at numbers but, if you had
- 17 a sort of difficult case and arguably what we're talking 18 about here were quite a lot of difficult cases with 19 publicity, then they would have been looked at by the, 20 you know, by Non-Executive committees, as well as 21 Executive committees, and we'd have a sort of legal 22 annexe and, I mean, I've had that in other companies 23 which I've chaired or sat on as a Board. You would know 24 what was going on in the legal area and that would be 25 a combination of tribunals, prosecutions, et cetera.

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1 and the event of privatisation?

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Well, I think, obviously, if you're a governmental body it's fair enough that, if there is fraud or harassment or whatever, that, you know, you would have a Legal Department and that could bring prosecutions or you could take them to the CPS if you wanted them to do it. I think once, you know, you've privatised a whole thing, you know, you've got to set up -- you've got to have a proper Legal Department and, as I said, I think it must have been split between the two bodies and, in a commercial operation, especially where there seemed to be some sort of benefit to the Post Office from the prosecutions in that, you know, the money -- they were recovering money which then goes into their bottom line, or it was sitting in an account, then that -- the, you know, the -- there's a slight -- a sort of slight inherent conflict of interest would be my concern.

So either you could stop prosecuting and I think they did stop prosecuting all the Horizon related one I even took over. I may have to check that. So it's important that either you don't prosecute and you get the CPS to do it or you set up a proper system of kind of reviewing the cases to make sure that you're learning from mistakes. And, in a commercial company like the ones I was used to, you know, learning from mistakes was

one of the big features that a Compliance Committee would always look at, you know, have we done it this right way? You lost a case, you know, why was that? Or there seems to be an awful lot of these different things

I remember, for example, on slips and trips in stores, we actually changed the whole system because we discovered we were having a great many cases on that, and people perhaps slipping over, hurting their foot, and then coming back and taking a legal case against us, which took ages.

So we changed the whole system so that remedies could actually be addressed straight away in the store, that you would apologise to the person, take them home, send them flowers, if necessary give them some sort of minor element of compensation. And that stopped -- that stopped -- it's an example of learning from mistakes -- it stopped us having so many cases and, you know, customers getting a remedy much more quickly. You mentioned that, by the time that you were in office,

- Q. You mentioned that, by the time that you were in office,
 the Post Office had stopped prosecuting cases based on
 Horizon.
- 23 A. Mm.

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- 24 Q. Did you know that at the time?
- 25 A. I mean, I'm not sure when I learnt it but I did find

A. The individual detail of who exactly did it. There
weren't as many prosecutions as I know many store
managers wanted, which perhaps suggests to me we were
using CPS rather than doing it ourselves but perhaps
I could come back to you on that point, if that's
permitted?

7 SIR WYN WILLIAMS: Yes, of course it is. Thank you.

8 MR BEER: Thank you.

We saw very briefly that the second annexe to the briefing note of the 2 June 2015 was the draft letter to Alan Bates declining a meeting with you and you accepted the advice that you should decline the meeting and therefore didn't meet him. You had, however, been asked to meet Paula Vennells, by this time the CEO of the Post Office; is that right?

- A. Yes, the original briefing had a sort of table of things
 that I should do as Minister, and that included meeting
 the CEO, which seemed very sensible.
- Q. That meeting occurred relatively early in your period in office; it was 11 June, I think, 2015, and you received a briefing for it two days beforehand on 9 June. Can we look at that, please. It is UKGI00001074. 9 June.
 Again, it's from Laura Thompson to you, for a meeting on 11 June. You'll see the proposed attendees additionally

11 June. You'll see the proposed attendees additionall included Al Cameron, Kevin Gilliland and Mark Davies.

that out. So, given there was an uncertainty, whichbecame more and more apparent as we went through the

3 year, that was obviously good news that they weren't

4 continuing when you've got these outstanding cases which

5 were before the Criminal Cases Review Board. So that

6 was extreme -- obviously a sensible thing to do.

Q. Was it revealed to you that the reason that the Post
Office stopped prosecuting, or the reasons included,
that the Post Office could not find any expert witness
who would testify as to the integrity of Horizon or the
data that it produced?

- 12 A. No, I wasn't aware of that until this Inquiry.
- 13 Q. We saw that the --

SIR WYN WILLIAMS: Before we leave prosecutions, Mr Beer,
can I just -- it's a very minor point but I wanted to be
clear about it. When you were talking about your time
at Tesco, Baroness, you said, "We prosecuted
shoplifters". Just so that I'm clear, do you mean by

that that Tesco took out private prosecutions or do you
 mean you reported them to the police, who then

21 instigated a prosecution via the CPS?

A. It's a very good question, Sir Wyn, which I'd like to
 come back to you on because I wouldn't want to mislead
 you. I mean, obviously prosecutions were taking place.

25 **SIR WYN WILLIAMS:** Sure.

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Tim McInnes from ShEx would also attend.

Under "Background":

"This is your first meeting with Paula Vennells since you became the Minister for the Post Office. Paula has tended to meet with ministers 2-3 times per year."

It says:

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"[She] will want to give you an overview ...

"... will also want to discuss the [away day]."

Then over the page, please. "Main issues to discuss", I'm going to speed through these: long-term strategy; financial performance; Network Transformation; banking; then over the page, Horizon:

"Paula may want to reassure you that [Post Office]

"Paula may want to reassure you that [Post Office] are handling the issues relating to the Mediation Scheme set up in connection with their IT system, particularly the forthcoming BBC Panorama programme ...

"It remains the case that there is no evidence of systemic fault within the IT system. We ... have communicated to [Post Office] that the Government maintains that the Mediation Scheme and cases within it are independent of Government. [Post Office] are supportive of that approach."

So essentially a repetition of the briefing we saw in the 2 June 2015 pack?

Now, there is no surviving minute of this meeting, we are told. Have you any reason to believe that the meeting didn't track the briefing and, therefore, firstly, Horizon formed only a small part of your discussion; and, secondly, that you weren't told anything other than is set out here? A. Yeah, I mean, on Horizon, this would be my recollection of what I was told by Paula and others from POL at that time and the meeting will have -- I think was more wide-ranging and I was interested in the transformation, the commerce, how they were going to retail and more general issues and the Premium Bonds were at some stage -- I remember agreeing to go and see the Treasury Minister, very unsuccessfully, to get the Treasury to continue to use post offices for their -- for selling some of their products. Q. Thank you. Can we move forwards in the chronology then to the BBC Panorama programme, the Adjournment Debate, which eventually led to a meeting between MPs and the Post Office. Can I use your witness statement to track this part of the chronology please, page 12, paragraph 46.

Paragraph 46 is at the foot of the page and you say:
"On 24 June 2015, Laura Thompson sent a submission
to both me and George Freeman ... regarding a BBC
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the problems with Horizon and that 'the past three years have underlined the confidence we have always had in Horizon — it has been found to work as it should'. Ms Vennells set out in her letter that [Post Office] had found nothing to suggest that any conviction was unsafe, and that [Post Office] took 'great care' regarding its continuing duty of disclosure on all matters including full cooperation with the CCRC … This was of a piece with the information I was being provided by ShEx. We now know, of course, that it was seriously misleading."

Moving on, you tell us in paragraph 51 that on the 29th Andrew Bridgen called an Adjournment Debate:

"... a number of MPs called constituents' complaints. Mr Bridgen stated that he and a number of colleagues had 'lost all faith and trust in the Post Office's willingness to investigate the issue ...' criticised the Mediation Scheme, and called for a public inquiry. George Freeman ... referred to the striking degree of concerning expressed by Parliamentarians at and in the lead-up to the debate, and offered to convene a meeting between MPs and [Post Office] executives in which the issues could be discussed."

Then moving on, please, to paragraph 52. You say:
"I understood that at least some subpostmasters were losing, or had lost, trust and confidence in the

Panorama programme ... which was due to be broadcast on 29 June (though it did not in fact air until 17 August) ... This was in timed to coincide with an Adjournment Debate called by Andrew Bridgen MP, and the submission indicated that both Mr Bridgen and James Arbuthnot were understood to be involved in its making. It stated that the programme was expected to be 'highly critical' of [Post Office]. Ms Thompson again advised that Horizon 'is a matter for Post Office and subpostmasters and it would be inappropriate for Government to intervene'."

Then over the page, please, paragraph 47:

"The Post Office had fallen within my portfolio for around seven weeks by this time and I could see a pattern emerging: it was the consistent advice of ShEx that these matters were independent of Government, that [Post Office] was dealing with the various matters appropriately, and on Horizon that there was no evidence of any systemic problem despite rigorous independent testing, and that I should not be interfering."

Then if we go further down the page to paragraph 50 you say, although you didn't see it at the time:

"... I have since been provided with a letter dated 26 June from Paula Vennells to George Freeman in advance of the Adjournment Debate, in which she stated that [Post Office] had gone to 'great lengths' to investigate

Mediation Scheme, whilst at this time ShEx officials were telling me that 'Post Office have put a great deal of effort to be helpful and transparent here, yet are constantly denounced for their approach and their apparent 'contempt' for MPs without any real evidence to demonstrate why. They accepted the seriousness of the situation and are committed to resolving it but are becoming increasingly frustrated by the attacks ..."

"I was keen to preserve the Mediation Scheme, see the CCRC reach conclusions and encourage engagement between the subpostmasters and Post Office. I agree with George Freeman that the way forward was to bring the interested parties together and at least provide a forum for open, frank and sensible discussion [that] would not have happened had [you followed] ShEx's advice."

Can I look at the exchange in which you agreed with Mr Freeman's approach. WITN10200103, please.

Can we start with page 3, please. There's an email from 1 July from Laura Thompson to your private office and Mr Freeman's private office, amongst others; can we see that? Ms Thompson says:

"Andrew ..."

He was one of those that worked in your private 40

(10) Pages 37 - 40

pparent 'contempt' for MPs without any real evidence emonstrate why. They accepted the seriousness of ituation and are committed to resolving it but are ecoming increasingly frustrated by the attacks ..."

You say:

"I was keen to preserve the Mediation Scheme, so the CCRC reach conclusions and encourage engages etween the subpostmasters and Post Office. I agree with George Freeman that the way forward was to bring the properties of the subpostmasters.

1	office, the person you referred to earlier; is that
2	right?

3 A. Yes.

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4 Q. "Please see attached submission [sent to the pair of 5 you]. It follows up on Monday's Adjournment Debate in 6 the Commons on the Post Office Horizon system, which is 7 Baroness Neville-Rolfe's policy lead but the debate was 8 taken by George Freeman.

> "The submission recommends how we meet the commitment made by Government (and repeated at [Prime Minister's Questions] today) to convene a meeting on this matter. There are draft letters for [you] to send to Andrew Bridgen (who called the debate) and Paula Vennells, Post Office CEO."

Then if we go to the bottom of page 2, please -thank you -- can you explain who the email is from and

18 A. So that's to me, myself, from my private secretary --

19 Q. So --

20 A. -- attaching a submission, yes.

21 Q. -- Andrew Smith, your private secretary, using your 22 private office email address, sending it to you, in 23 a personal email; is that right?

24 Α. In a personal email, probably my Parliamentary account 25 but obviously it's not clear from there, yes.

1 invited to the meeting. So officials, in this context, 2 would that be from ShEx?

3 A.

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4 Q. So, so far we've got Mr Freeman and his antennae maybe 5 twitching a little by him saying, "I think it's 6 important, I strongly believe that Second Sight should 7 attend this meeting"; ShEx recommending strongly that 8 they're not, to your private office; and then you reply 9 about an hour later, we can see it at the top there:

> "I am uneasy about overruling George Freeman and am not sure about excluding others."

So, at this point, officials were trying to persuade you to exclude Second Sight from the proposed meeting; your ministerial colleague and you disagreed?

15 A. I disagreed, although in the end I think I agreed to 16 a meeting without Second Sight, but we'll --

Q. But we will develop. 17

A. -- come on to that, because they went on nagging away at 18 it and I was keen to get the meeting to happen. Anyway, 19 20 perhaps we can -- but that's right, I was uneasy, you 21 know but then they had reasons, which presumably we'll 22 come on to

23 Q. If we scroll up, please. Your private secretary sends 24 your reply back to ShEx, in particular Laura Thompson. 25 Then scroll up, please, and then a little further, about

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Q. Yes.

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"Minister,

"Please find attached a submission on the Horizon Adjournment Debate outlining next steps. Officials are keen for the draft letters to issue [ASAP]."

Skipping a paragraph:

"George Freeman's comments as relayed by his private office are 'The Minister considered your advice and he is somewhat content. However, he feels strongly that Second Sight and George Thomson (NFSP) should be invited. He commented that the MPs focused on Second Sight and it would not be a satisfactory meeting without them. He agrees that JFSA should not attend'."

So here you're being told that there's a submission, including draft letters, to go out to Paula Vennells and Andrew Bridgen, who called the debate, that this has been run past your colleague in the Commons, George Freeman, and he said that he felt strongly that Second Sight should be invited to attend the proposed meeting,

21 A. Correct.

22 Q. Then, if we scroll up, please.

> Mr Smith writing to you, about half an hour later on the same day, saying that he had just had a call from officials who recommend strongly that Second are not

an hour later, a long email from Laura Thompson. So she's called in, or somebody from ShEx has called in, saying, "We think it's a bad idea that Second Sight are invited to this meeting", and then this is followed up by a long email we'll see, taking the same point.

Laura Thompson says:

"I understand the Minister's concerns about excluding people, and that George Freeman is in favour of inviting Second Sight because MPs focused on them. However, I would still recommend strongly that they are not invited to the meeting. The legal risk to Post Office (and, potentially, Government) is significant if this meeting prejudices the work of the [CCRC]."

So, at this point, ShEx had had an attempt to exclude Second Sight by calling your private office, and they're trying again in this email, and raise a point that there's said to be a significant risk to the Post Office, legal risk to the Post Office, and indeed to Government, by prejudicing the work of the CCRC by meeting Second Sight; did you or do you understand the logic of that position?

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22 **A**. I mean, I don't know what I thought at the time but what I would say is, if I'm told that something prejudices the work of the Criminal Cases Review Commission, I take that seriously and, clearly, officials, who at that time

I had no reason to believe were not doing anything that was not in my own interest, were saying that we shouldn't have Second Sight and it seemed to me that the key thing was to see the MPs and hear what they'd got to say and to get them to actually talk to the Post Office, because there seemed to be something of a stand-off between these MPs and the Post Office, which was why I was keen to have a meeting and hoped that it would be constructive. Perhaps over-optimistic at the time, but that was my approach.

Q. Ms Thompson continues:

"... we have very grave concerns that, based on Second Sight's conduct to date, they will not respect confidentiality or the terms of their engagement either during the meeting or afterwards. We understand (although cannot confirm) that they have links in to JFSA and strongly believe their presence in the meeting will do more harm than good."

Then she adds a second point that:

"... the Post Office are extremely worried about the risk to their business from this meeting, particularly around legal issues like the CCRC. I'd be concerned that inviting Second Sight could be a red line for them -- we would have to consider what would happen if this were the case, but I think it is important to

meet the MPs and talk to them about their concerns and,
you know, not actually having Second Sight present.

I mean, that didn't seem to me to be a killer point.

The key point was to get on and have the meeting. We could always have another meeting with Second Sight on another occasion, if that's what turned out to be necessary.

8 Q. Thank you.

A. But, I mean, I have to say, in a busy day, this is going backwards and forwards, it was probably, you know, a snap judgement, "Let's get on, let's have the meeting and let's invited the Post Office to come", although they didn't in fact send the CEO, which was a disappointment to me, as you'll see from later documents.

Q. We're going to come to that after the break.

Before we do, can we see what happened by looking at your witness statement, page 16, paragraph 58, please. Much as you told us, you say:

"The key thing, from my perspective, was to get the MPs together in a room with Paula Vennells and [Post Office] executives and hear what they had to say. I was aware that the relationship between [Post Office] and Second Sight was not healthy, and thought it would be easier to get Ms Vennells to attend if they were not

remember that Post Office have put in a great deal of effort to be helpful and transparent here, yet are constantly denounced for their approach and their apparent 'contempt' for MPs without any real evidence to demonstrate why. They accept the seriousness of the situation and are committed to resolving it, but are becoming increasingly frustrate by the attacks against them and it is not clear what more they can do -- remembering, as we mentioned to the Minister, that [Post Office] are effectively fighting with one hand behind their back because they are respecting confidentiality when others are not."

So this is taking a separate point: never mind the merits of the situation, the Post Office might consider this a red line and this is another reason to exclude Second Sight?

A. Yeah, I think the main point is about prejudicing criminal work somewhere else or civil work somewhere else. Obviously, this is perhaps the first example of Post Office -- of ShEx very much taking strongly a Post Office line and bringing that through, which is interesting.

But I took the view that we'd promised a meeting, a meeting promise had then been repeated by the then Prime Minister, David Cameron, and that I was keen to

there. I also took at face value the concern that Second Sight presented a risk of leaking what was said at the meeting, and also thought it was important to avoid the meeting descending into a discussion of individual cases. The point was to have a productive discussion between MPs and [Post Office] senior management as part of a process to 'get to the bottom of the matter', and it seemed most likely that that would happen without Second Sight at this stage."

Then you tell us you did later subsequently meet with Messrs Warmington and Henderson. So some letters went out, can we look at those, please, UKGI00004820, a letter of 2 July to Andrew Bridgen. Scrolling down, thank you -- just a little bit further -- sorry, no, further up:

"I am writing as the Minister responsible ... further to your Adjournment Debate ... I would like to follow up on the offer [of George Freeman] by inviting you to attend a meeting at the Department to discuss this matter."

You mention in the next paragraph the Mediation Scheme, and confidentiality and the importance of maintaining it.

In the third paragraph, the fact that the CCRC has received applications from individuals in the scheme.

1 Paragraph 4, you say: 2 "The Government acknowledges the concerns that [MPs] 3 raised during the Adjournment Debate." 4 Paragraph 5: 5 "The Government wants to ensure that MPs take the 6 opportunity to raise their concerns directly with Post 7 Office. At the same time, the Government would like to 8 allow the Post Office a further opportunity to address 9 the very serious accusations that have been made against 10 it. The meeting will provide an opportunity for both 11 MPs and Post Office to understand each other's views 12 better, while maintaining the confidentiality of 13 individual cases and respecting the work of the CCRC." 14 Then over the page: 15 "This will be a private meeting and I will be 16 writing in similar terms to the Post Office to invite 17 them to attend." 18 Then can we look at POL00027164, a letter on the 19 same day to Paula Vennells, the CEO of the Post Office. 20 If we just scroll down, you'll see it's in very similar 21 terms, so an equivalent letter. Both letters were, in 22 fact, silent, I think, on the issue of Second Sight 23 attendance. 24 A. I think they did say we might have another meeting or 25 something, on a future -- I mean, there's 49 1 attend", and that you found some time to speak on 2 Tuesday morning in advance of the meeting. 3 Ms Vennells continues: 4 "As you know, we have been open and transparent with 5 MPs throughout this important process and have met 6 Mr Bridgen previously with some of his fellow MPs. 7 "Regrettably, it is clear our engagement has done 8 little to address his concerns. Since our last meeting, 9 Mr Bridgen has on he occasions refused our offer of 10 a further meeting, most recently last week. We have also offered every MP with a constituent in the Scheme 11 12 the opportunity to discuss with us, subject to 13 [consent]. Just three MPs have taken up this [offer]. 14 "... over the last three years, the Post Office has 15 been trying to address a small number of individual, 16 private, complaints brought to it by (mostly) former 17 subpostmasters about problems they experienced whilst 18 working in their post offices. Despite the finding of 19 an initial investigation that our computer system did 20 not suffer from systemic flaws, we established a scheme 21 22 "... all cases have been comprehensively 23 reinvestigated and independently reviewed and all of 24 this work has been shared with individual applicants ...

It is worth reiterating that in none of the cases has

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a possibility -- silent, if you go over -- keep going. 1 2 Q. So if we scroll down a little further. 3 A. Yes: 4 "Following this meeting we will consider whether any 5 additional further action or meetings required." 6 I think I kind of might have put that in to --I can't remember but that --7 8 Q. But it doesn't explicitly say --9 A. It doesn't explicitly --10 Q. -- Second Sight will or will not --11 A. It doesn't say Second Sight are being invited, it 12 doesn't say Second Sight aren't being invited, but it's 13 trying to set up a constructive conversation, try and 14 get two sides a little bit closer together. 15 Q. Can we look at the reply from Paula Vennells. 16 UKGI00000026, her reply of 10 July to you. 17 "Thank you for your letter of [the 2nd]. 18 "Post Office is, of course, willing to attend 19 a meeting to discuss these matters and I note that it 20 has been set up for Wednesday. Unfortunately, this 21 coincides with a Post Office Board meeting; therefore 22 I hope you will accept my apologies. My colleagues, 23 Mark Davies, our Communications and Corporate Affairs 24 Director, and Patrick Bourke, who leads the Post Office 25 team dealing with the Scheme, will be pleased to

our computer system been shown to have caused the losses complained of and in none of the cases has any evidence medicine to suggest that convictions are unsafe."

Then over the page.

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"Instead, in a majority of cases, it is clear from the evidence that errors made in branch are responsible for the problems that arose. In some other cases, the Post Office acknowledges it might have done more to support individual subpostmasters ... In a last group of cases (thankfully a minority), regrettably, subpostmasters have committed criminal offences, either by dishonestly covering up losses, or by stealing money, or both."

Skipping a paragraph:

"In cases involving a criminal conviction, our investigations reveal that the facts on which the convictions were based cannot be distinguished from the says raised by applicants to the scheme. Therefore, mediation is not appropriate as it is not capable of producing the principal outcome sought ... because only the courts can overturn a conviction."

Skipping a paragraph:

"As you note, a number of these applicants have asked the [CCRC] to look into their cases and it would be highly inappropriate to do anything which might

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interfere in its work ... "In short ... applicants to the Scheme have a choice to sit down and mediate their case with the Post Office, litigate the civil courts or pursue any claim of miscarriage of justice through the established processes. Given these clear choices ... it is not immediately clear what the Post Office could offer beyond restating the choices ... However, we will try to address as many of the concerns expressed by MPs as we

"Finally, and while you do not mention them in your letter, there have been suggestions that Second Sight should attend a meeting. As Second Sight has no standing in the disputes between the Post Office and applicants ... we do not consider their involvement to be necessary or appropriate."

So Ms Vennells seems emphatic that you and the MPs should not meet Second Sight, yes?

- 19 A. Certainly she doesn't want Second Sight at that meeting.
- 20 We know that, by this time, Post Office knew there were 21 bugs, errors and defects within the Horizon system and 22 that Second Sight had discovered some of those bugs. We 23 know that the Post Office, by this time, knew that forms 24 of remote access by Fujitsu to the system were possible,

25 including a form of remote access by which financial

you're describing him -- I think later he's described as the Government Affairs Director --

3 Q. Yes.

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4 A. -- whereas obviously my hope would have been that Paula 5 Vennells herself would have turned up, so that one could 6 have made some progress, rather than people who were, as 7 it were, managing the MPs and managing -- you know, even 8 tying to manage the ministers. So that -- so that was, 9 I think, regrettable.

10 Q. We have seen the reason that Paula Vennells gave for not 11 being able to attend was a diary clash?

That's what that says and that's what I took at face 12 Α.

13 value --

14 Q. Yes.

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15 A. -- although --

16 Q. Have you seen information since then?

17 A. Well, I think somebody mentioned to me, but I can't give 18 you chapter and verse, that, actually, there was advice 19 that she shouldn't attend the meeting, which is 20 a slightly different point, clearly. I understand the 21 importance of Board meetings. I don't know what the

22 exact timing clash was. Q. Let's just look at that, please, POL00388295.

24 And look at page 2 first, please. If we scroll 25 down, please:

data at branch level could be amended by the insertion of transactions into an account, without the subpostmaster's knowledge, and that Second Sight, on the basis of some whistleblower evidence, had discovered some of this

We know that, by this time, the Post Office knew that its principal expert witness in criminal prosecutions was said to have breached his duties to the court and to have given misleading evidence to the court, but the Post Office had decided not to reveal that information either to Second Sight or to convicted defendants.

Did you know any of those things? A. I didn't know any of those things, no, but I'd also note that Paula Vennells didn't come to the meeting. I suppose if she knew -- and she's written this letter, which, certainly, if that was known to her, is odd that there's absolutely no suggestion of any hesitation or

concern on any of those points at that point in time. 20 She didn't come, she sent the -- Mr Davies who was 21 communications person.

22 Q. And Mr Bourke, the Corporate Affairs Director?

23 A. And Mr Bourke. At that time, I remember that, I asked 24 who was this person, and I was told, well, he was the 25 person in charge of the Mediation Scheme but, actually,

"Please see attached that has just arrived."

2 That's your letter.

"I assume we should seek to respond quickly.

"It is still my view that Paula should not attend but should perhaps speak to [Baroness Neville-Rolfe] beforehand? I am very open to contrary views."

That's Tom Wechsler, Ms Vennells' then Chief of Staff.

Then scroll up, please, to see what the Communications Director said.

"I agree re Paula point and this was also her view when we spoke this morning. And I also agree that she should speak to her in advance."

I think that means "I agree that Paula Vennells should speak to Baroness Neville-Rolfe in advance":

"I suggest we reply as warmly as possible, especially as the letter is from [you]."

Then scroll up, please.

"I share that view re Paula", says Patrick Bourke.

Then scrolling up, please, Tom Wechsler then agrees re attendees and I think that's the end of it.

So, at the time, you wouldn't be aware, presumably, that various Post Office PR and communications people were providing advice behind the scenes to Paula Vennells that she should not attend the meeting with

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you? You took at face value what was said in her letter, that she had a diary clash. A. I took it entirely at face value and, of course, it's a Board meeting and you do try to respect -- if you're a Director, you do tie to make sure you do go to Board meetings. So it was a perfectly valid excuse but I was somewhat perturbed when I subsequently saw this, that actually it was strategic rather than a diary clash. Because I think, having her there would have been good, because she would have had to listen to the MPs' concerns and answer them herself. MR BEER: Thank you. Sir, that is an appropriate moment for the morning back. Could we break until 11.25, please? SIR WYN WILLIAMS: Yes, certainly. MR BEER: Thank you, sir. (11.11 am) (A short break) (11.25 am) MR BEER: Good morning, sir. Can you continue to see and hear us? SIR WYN WILLIAMS: Yes, thank you. MR BEER: Thank you.

legal representatives. I believe they also raised concerns about document destruction.

"63. I recall thinking that the concerns expressed by Andrew Bridgen and Kevan Jones needed to be taken extremely seriously."

Baroness Neville-Rolfe, can we turn briefly to what

happened at the meeting between Post Office and the MPs.

You say, skipping a paragraph:

"This meeting, which took place within 2 months of my taking up the postal affairs role, was an important step. Amongst other things, it brought home that the processes in place -- including mediation and the CCRC process -- were not working satisfactorily. More generally I was from the start surprised that so many people from normally reliable sections of the community were being convicted of dishonesty. This was troubling."

On that last sentence there, can you explain more generally what you meant, please?

A. As I got into the individual cases, which earlier on I'd been discouraged from thinking about, it became apparent that these were honest citizens who perhaps had, on retirement, bought a -- I think if you buy a Post Office -- I'm not quite sure what the arrangements are -- people like Lord Arbuthnot's constituency, I think is in Hampshire, you know, leafy, middle-class people, who suddenly, out of the blue, with no even

1 Is it right that you essentially chaired or facilitated2 the meeting?

3 A. Yes, I chaired it, as would be normal with a ministerial4 meeting.

Q. Can we turn to page 17 of your witness statement,
 please, and look at the foot of page 17. At
 paragraph 62 you say:

"The meeting between MPs and [Post Office] was attended by Andrew Bridgen, Kevan Jones [they're the MPs] Mark Davies ... Patrick Bourke ... Laura Thompson ... and [you]. A note was drafted by Ms Thompson ..."

You give the reference to it, I was going to give your witness statement instead to address what happens. You say:

"The note records that Messrs Bridgen and Jones outlined their concerns relating to some individuals.

The concerns focused on the length of time the issue had been ongoing and the view of the MPs that [Post Office] had acted with a lack of transparency in dealing with the claims that there had been problems with Horizon; the way in which [Post Office] had used its powers of prosecution; the length of time it took for cases to progress through the Mediation Scheme; concerns about miscarriages of justice where individuals had been advised to plead guilty to false accounting by their

suggestion that they had either themselves or any of their friends and relations been involved in anything dishonest, was suddenly ending up in court and being convicted, mainly, I think, on grounds of false accounting but in some cases of theft, and that just -- I'd got all this evidence that everything was fine, that there was nothing wrong, that there'd been an independent inquiry which actually told us that the Post Office was right, and yet the people who were, as it were, going down were terribly honest citizens.

I have to say this is the thing that worried me.
You know, I have come from business and I'd also come from the Civil Service and, you know, it's not -- it's not only keeping the business going, it's having an element of common sense and thinking about your staff. So that -- so that was what worried me, but I didn't actually have any information to support my case until I had this meeting and Andrew Bridgen and Kevan started to, you know, list some of these points.

That was my sort of road to Damascus, if you like, beginning to realise that there were quite small numbers -- we were talking about I think about three or four MPs at that time -- who'd had these very unsatisfactory experiences with what I call Middle Britain.

Then this:

Q. Thank you. Can I check with you whether a couple of

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2		issues were addressed at the meeting, by firstly looking	2		"Having 'Dickensian' contract arrangements with
3		at POL00027729, which is an email you wouldn't have	3		postmasters, 'suspicious' suspense account procedure and
4		seen this at the time, it's internal to the Post	4		an inadequate helpline."
5		Office from Mark Davies on 15 July, at 8.17 in the	5		Have you any recollection that the contract itself,
6		evening, to, amongst others, Jane MacLeod, Paula	6		said to be Dickensian, which was rather prophetic
7		Vennells, Angela van den Bogerd and he says, if we	7		because that's how the Court of Appeal was subsequently
8		scroll down:	8		to describe it in similar terms many years later,
9		"All	9		whether that was raised?
10		"Patrick and I met with Andrew Bridgen and Kevan	10	A.	Well, I have no reason to believe that it wasn't. After
11		Jones today, at a meeting chaired by [you].	11		all, it's on a memo from POL saying what came up, which
12		"The meeting was held up as Mr Jones was late.	12		disturbed them and, clearly I probably knew at the
13		Mr Bridgen then ran through his central points.	13		time that the way it works is that a subpostmaster is
14		"This included no new allegations and was broadly	14		almost like is a kind of agent responsible for all
15		a repeat of his Adjournment Debate script. He raised	15		their you know, for everything that they do and that
16		some new unnamed cases	16		was no doubt incorporated into the contract. It's
17		"He accused the Post Office of:	17		a very one-sided arrangement but then, I think, to be
		"Abusing its prosecution powers and using plea	18		,
18					fair, post offices entered into that knowing that it was
19		bargaining to 'cajole' people into accepting guilty	19		a one-sided arrangement and thinking that they would be
20		pleas.	20		able to cope with that because, you know, often they had
21		"Curtailing Second Sight's work and the Mediation	21		a lot of experience of running small businesses and
22		Scheme.	22		things when they took over post offices.
23		"Reducing scope of [Second Sight's] work and forcing	23		You weren't didn't become a subpostmaster
24		[Second Sight] to moderate its reports.	24		overnight. You know, there was some sort of, I assume
25		"Not cooperating with [Second Sight]." 61	25		there was some sort of vetting procedure before you 62
1		actually got given the keys to Horizon.	1		"He accused Patrick and I of lying to him and
2	Q.		2		Mr Bridgen in the meeting. We did not.
3		contract at the time?	3		"The MPs asked the Minister:
4	A.	I think I knew after this meeting. It wasn't referred	4		"To call an independent inquiry.
5		to in any of the briefing that I'd had prior to that	5		"To meet with Second Sight.
6		from ShEx, that I've noticed. But I mean, obviously	6		"They asked us:
7		it's difficult for me to remember 10 years hence when	7		"To provide details of how much we paid out to
8		I learnt what I learnt. But it was a sort of I was	8		settle claims.
9		gradually learning, from listening to these outsiders,	9		"We agreed:
10		what their problems were, and one of the problems, it	10		"To write to both MPs reiterating our offer to meet
11		seemed, was the contract arrangements. And, of course,	11		•
12		I know now because I have been given information about	12		"It was a very unpleasant meeting at which Patrick
		ū			and I were robust but respectful in making our case in
13		what eventually happened that was that the contract was	13		· · · · · · · · · · · · · · · · · · ·
14	_	a key issue in the Fraser judgment.	14		[the] face of an approach which was volatile and at
15	Q.	Lastly, Mr Bridgen accused the Post Office of:	15		times aggressive."
16		"Using Bracknell and remote access to target and	16		Do you remember these two MPs being volatile and
17		implicate postmasters of wrongdoing."	17		aggressive?
18		Then:	18	A.	To be honest, this isn't my note of the meeting and
19		"[Kevan] Jones endorsed the above and accused the	19		I didn't see it at the time and, if I had, I think that
20		Post Office of:	20		was probably a little bit unfair on them. They were
21		"Using the Mediation Scheme as a smokescreen to pass	21		actually explaining clearly what their concerns were in
22		the Statute of Limitations.	22		detail, which frankly was exactly what I wanted in
23		"A deliberate and planned cover-up.	23		having the meeting.
24		"Leaning' on [Second Sight].	24	Q.	•
25		"'Gagging' Panorama.	25		"This was a very difficult meeting. We now need to

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ensure that the Minister [that's you] understands the position. While she was supportive, there is a risk that the complexity of the issue, plus MP interpretation of that complexity, causes the search for simple 'solutions' which we know do not exist."

Then, at the foot of the page, second paragraph up:

"The Minister did appear to agree that it would be rather difficult to make progress if the MPs refused to engage with the rest of the story."

Can you recall which commitments you made, if any, at the conclusion of the meeting?

A. I'm sure I will have said that I would reflect further because that would have been standard practice and I think I encouraged the MPs to talk to the Post Office, because there'd been the stand-off between them and it looks from this as though there was some acceptance by Mr Bridgen. There was also a point about documents. There seemed to be concern that documents were being shredded, which would be helpful to the unfortunate people who'd been prosecuted, and I do recall -- I don't know -- probably as a result of this meeting -- that took some steps to do something about that, because obviously, given my commercial background, I was very aware of the importance of not shredding documents, even very old documents, and of your legal duty, particularly

important and pivotal he was. So I was obviously keen to talk to him, and I did later meet him, and, you know, he's played a crusading role in all of this.

Q. Can we see what ShEx's follow-up was to the meeting by looking at UKGI00015226. This is 17 July, so two days later. The "Purpose", says Ms Thompson, is the:

"Next steps following your meeting on Wednesday, with MPs [with a recommendation] That you:

"Note that the Post Office will write to [Messrs Bridgen and Jones] to reiterate the offer of a meeting and provide information relating to some of their concerns.

"Agree that you would like to meet James Arbuthnot, as discussed in the meeting and confirm whether [or not] you would like officials and/or Post Office to attend.

"Decide whether you would like to write to Sir Anthony Hooper ...

"Agree that you should write to the Prime Minister following your meeting with James Arbuthnot ..."

I just want to explore the last of those, please, by looking at paragraph 9 of the note, which is over the page. Ms Thompson says:

"Following your meeting with Mr Arbuthnot and, if appropriate, Sir Anthony, we recommend that you should write to the Prime Minister, to set out your assessment

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if you were an actual trained lawyer, you know, a barrister or solicitor, not to shred documents.

So I think I recall that coming out of it and, obviously, I went away and, you know, wanted further meetings to discuss what might be done.

Q. Thank you. That can come down.

> You tell us in your witness statement that at about this time -- it's paragraph 65, no need to turn it up:

"All of the advice I was receiving regarding Horizon was from ShEx. This was supposed to be impartial and balanced. However, my faith in that advice was beginning to wane. I now wanted to hear different views and wanted to apply some more independent scrutiny to the issue than had been offered to date by ShEx and, at that meeting, I agreed with Andrew Bridgen that I should meet with James Arbuthnot MP."

Because this meeting therefore one of the turning points in the unfolding picture?

A. Definitely. I think the MPs played an important role, you know, in articulating the issues and articulating the problems in a way that perhaps the experts, Second Sight and things, were not able to do, and I think James Arbuthnot was probably -- may have been invited to the original meeting and hadn't been able to come, I don't know. But it became apparent from that meeting how

of the situation and the Government's position, having 'got to the bottom of the matter', to use his words."

I think they're the words that he used in PMQs.

4 A. Yes.

> Q. "We strongly recommend that the Government comes to an agreed position, and ideally should communicate whether it will take any action. We advise that the priority should be to put this issue to bed -- continued uncertainty and allegation does damage to Post Office's business and prevents those individuals with cases from reaching a resolution. We will provide further advice on this [and] propose your office sends a short note of the meeting ... to the Private Secretary at Number 10."

What did you think to this suggestion that you should write to the Prime Minister to set out your assessment of the situation, having got to the bottom of the matter?

A. Well, I think I had two concerns about this. One was 18 19 I wasn't sure I'd yet got to the bottom of the matter, 20 and the second is, it's not really appropriate for 21 a Parliamentary Under-Secretary of State to write to the 22 Prime Minister. I'm not sure that's -- perhaps

23 Ms Thompson didn't really know that. That is something 24 that would go through the Secretary of State or the

25 Secretary of State's office.

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2		suggestion?
3	A.	So I said I'm sure I didn't agree to it although it
4		comes back because they then produce draft and it goes,
5		takes days on end to go round through lots of different
6		people and then comes back to me to sign off, to look at
7		anyway, but it's not my note. So clearly the Prime
8		Minister had been involved at PMQs, so it's not
9		unreasonable that there should be feedback to Number 10
10		but certainly I wasn't in a position to write saying I'd
11		got to the bottom of it and, more important, it would
12		have been a first time that somebody, you know,
13		a Parliamentary Under-Secretary, had kind of written to
14		a Prime Minister on a business issue from their
15		Department because that seemed to me to be not what
16		normally happens.
17	Q.	So there a protocol or convention issue but then there

So for those two reasons, did you ignore the

17 Q. So there a protocol or convention issue but then there18 was an issue of substance as well?

A. There was substance and protocol which came together,
which means I, in your words, probably for that time
ignored paragraph 9.

22 Q. Thank you.

I think it's right that the next step in the chronology -- that can come down, thank you -- is essentially the provision of the Second Sight Part Two

itself (ie 'Horizon' and ... 'Horizon Online'), and even more narrowly on the software, rather than the entirety of the platform used by its subpostmasters. It follows that even if there had never been any systemic flaws in either version of the system (that being a contention with which we do not agree), that would not mean that the operational platform as a whole was always fit for purpose for all of the tens of thousands of users. As we have stated in our Report, it was not.

"I have attached here a copy of our Briefing Report -- Part Two."

Then scroll down:

"I am available at any time."

So he is attaching the Part Two Briefing Report, he is drawing specific attention to some paragraphs within it. If we go back to page 3, please, thank you. In the middle of the page, we can see an email from Andrew Bridgen MP to Andrew Smith, your private secretary; is that right?

A. Yes.

Q. "... please see that the email below reaches the
 Minister as it contradicts statements [made] by the Post
 Office."

Then if we scroll up, please. He, Mr Smith, forwards the chain to Laura Thompson. You'll see that

Report to you, towards the end of July. Can we look at some material that relates to that.

UKGI00005133. Can we start by looking at page 3, please. If we scroll down, please. Thank you. We'll see Mr Warmington's email in his familiar font, of 22 July 2015, to George Freeman. You're not copied in at this time. The subject is "Second Sight's Briefing Report -- Part Two", and he says, Mr Warmington:

"I am puzzled, and not a little distressed, by your summarisation in your recent email to Ian Warren [no need to look at that], and more importantly to Parliament [we're not going to look at that either], of my firm's Interim and Part Two Reports (there were, in fact, three reports). You have summarised our Reports with the following words: 'Second Sight have produced two independent reports, in 2013 and 2015, both of which demonstrate that there is no evidence of systemic flaws within the Horizon system which could cause the issues reported'. That is NOT a correct statement. I respectfully draw your attention to paragraphs [then he lists some] of our Report, and to the following additional paragraphs [then he lists some].

"You may have noted from reading our Reports, and also from Post Office's Rebuttal Documents, that Post Office has continually focused attention on the system

it CCs the same email address as he is sending it from.
Is there something that we are missing there, as to why
that would be done?
A. No. I think it might be to do with, if you've got
an attachment, if you copy it, does it -- is it
retained, or something. That's still the private office
address. It's not an address I've got access to.

8 Q. No. Then scroll up, please. We can see that9 Ms Thompson replies to Mr Smith:

"1. Ron Warmington ... has emailed George Freeman regarding Second Sight's Reports ... Mr Warmington states that he disagrees with the summary that Second Sight's reports demonstrates no evidence of systemic flaws within the Horizon system which could cause the issues reported by applicants to [the] Mediation Scheme. [He] directs the Minister to several paragraphs in the final report which he feels demonstrates that Horizon, in the totality of the user experience, is flawed."

Then if we scroll down:

"3. ... I would emphasise that our position is not arbitrate in this matter -- it is a commercial matter for the Post Office. As shareholder, we expect the Post Office to operate commercially and to handle operational and legal matters such as this one without Government intervention ...

"4. Following [the] email, we have looked again at the paragraphs he has highlighted ... The statement that 'there is no evidence of systemic flaws within the Horizon system' remains correct."

That does appear to be arbitrating:

"This is a position we have stated repeatedly, including in Parliament, so it is unclear why Second Sight are choosing to raise this now. We are happy to provide further detail on the ... points raised if Ministers require."

So how would you have read this kind of commentary from Laura Thompson on the Second Sight Report that was being sent through to you?

A. Well, I'm not sure whether I saw it at that time although I certainly saw if it later in the month and had a look at those paragraph numbers. I'd got concerned by that time, which is why I wanted to have a policy meeting to discuss what we should do about all of this and that's what happened on 4 August. I'm not sure I've got a lot to add. I mean, we can talk about the Second Sight Report if you want, here or later.

I mean, they refer to all these paragraphs. If you go through those particular paragraphs, it doesn't bring out nearly as clearly as the session I had with MPs what the issues were, particularly if you're not technical,

is the key points need to be in the covering memo. So Warmington's covering memo was helpful because a couple of the key points came out but I don't think I actually read the full report until later in the month, and you will recall that I then -- Mr McInnes sent me a memo saying "Well, there's nothing new here", and I asked for further advice, hoping that I would get further advice on the detailed allegations in the Second Sight Report, which at the time I didn't get. I got another note from the Post Office.

Q. So just dealing with the extent of your reading of the second Second Sight Report, can we look, please, at UKG100005504. We are skipping ahead in the chronology a little here but it is because of what is said in the body of the email. If we scroll down to the second email down, there's an email from your office to Mr Warmington of 14 August. You say in the second line, last two words:

"I have read with interest your 'Part Two Briefing Report' as well as the response from Post Office Limited."

Was that correct: that, by this time, 14 August, you had read the Second Sight Report and Post Office's 83-page rebuttal?

A. I had certainly looked through it and, later on, I think

you read through and you look at all those different
 paragraphs and then you look at the POL response, which
 is even longer --

4 Q. The 83-page rebuttal?

A. -- and comes back on it and, to be honest, for somebody who is not expert and not meant to be expert, it's actually quite confusing. And it was that -- you know, so I've got this milling about. Obviously, you've got somebody writing in saying that what Freeman had been advised to say looked -- I think they're actually saying was misleading, which is obviously a serious matter. So, for me, I wanted to try and find a way through but obviously the advice that I'm getting here is "Stay at arm's length, you know, we haven't got any reason to think that our advice is wrong, that the Second Sight Report demonstrated no evidence of systemic flaws within the Horizon system".

When did you receive the second Second Sight Report? I'm not convinced I saw it before that meeting of the 4th -- I mean, I may have been aware of it. What normally happens with a box is you read the top papers and, if you've got time or reason, you might read some of the annexes. It's one of the things that you that to explain to civil servants, actually, I've found, because I've had these different jobs, both inside and outside,

I say I've kind of looked through it. It's convention that if somebody writes to you as a Minister and they send you a report -- it happens all the time, they send you a report on accidents, statistics or procurement -- then you write back saying, "I've read with interest" -- this is a standard reply "I've read with interest your report" and, in this case, I have mentioned the two reports. That will have been drafted for me by officials of some kind and I have no reason not to quote it in a conventional way.

So it's not that I wasn't aware of the Second Sight Report and was aware that it had got important things in it but the idea -- it's perhaps slightly misleading, the idea that I would have been on top of all of it, but what I have said is they've committed to addressing them and making improvements, on training, which of course I think they had done but, obviously, I've stuck to the line of the parties involved.

But behind the scenes, you will know that I'd asked Tim Parker to, you know, do some sort of independent investigation of all of this, of which Second Sight would be at the heart.

Q. So just focusing at the moment then on the extent to which you read Second Sight's Part Two Briefing Report. In your witness statement, you tell us that you would

- have read the report or at least the passages whichMr Warmington had listed?
- 3 A. Yeah, yeah.

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- Q. I don't suppose you can remember which is the case?
- A. Well, I certainly read the passages which were listed
 and those were the ones I was commenting on: that, if
 you go through them, you don't get quite the same
 tonality as if you read the whole report from beginning
 to end. And then, of course, you turn to the POL
- response, and you're actually confused as to what you know, what you need. So, I mean, to some extent,
- 12 I think you have to understand, I was concerned about
- this. There wasn't that much I could personally do, in
- terms of getting on top of this. I therefore wanted to
- make sure that a proper piece of work was done on this,
- which is what eventually became the Swift Report.
- 17 Q. The Second Sight Part Two Briefing Report in summary
 18 finds that some form of unauthorised remote access may
 19 have occurred; that amounts in excess of £100,000 had
 20 been taken into Post Office's profit and loss accounts;
 21 that the Post Office operated contracts to the detriment
- 21 that the Post Office operated contracts to the detriment 22 of subpostmasters; and provided them with no automatic 23 entitlement to data upon which properly to judge whether
- or not they were liable for the losses alleged against
- 25 them; and that some prosecutions appear to have been
- 1 A. I think -- unfortunately I haven't got it with me but 2 I think there is a reference somewhere, because what was 3 done by POL, and perhaps by ShEx, was to pick up from 4 the work that Second Sight had done this sort of magic 5 sentence that there wasn't a systemic flaw. But, 6 actually, there were lots of other things in the report, 7 like the fact that obviously they'd had a really crummy 8 foreign currency scheme, which ended up losing money, 9 either for the unfortunate postmaster or indeed for the 10 Post Office itself, it's not too clear.

So there were these various different points in those reports, which I didn't have the time or expertise to really look at properly. And what they seemed to be just doing was repeating this mantra that Second Sight was fine and they'd gone native, and we should just ignore that report. And I was -- I didn't really like that approach to things. But I have to say, I think perhaps Second Sight -- you know, they weren't experienced, they weren't lobbyists, they hadn't brought out into the front of the report, in a way that might have helped them a bit more, you know, the key things that you have now summarised so beautifully and -- you know, as Counsel to the Inquiry. They didn't do that.

But the MPs had talked to them and they did bring out strongly exactly these points that you're -- that 79

focused more on debt recovery than in the interests of justice.

3 A. That comes out very well from the Swift Report, which 4 summarises -- which I only saw when I was preparing for 5 this hearing, summarises it very well. But, at that 6 time, I had asked ShEx for advice on this, you may 7 recall. So I'd said, "I'd like some advice, please", 8 and I had then been sent a memo by Mr McInnes which 9 repeated the usual mantra and didn't go into the 10 details. I never actually got proper briefing on that 11 report, and I don't think it's unreasonable for 12 a Minister to ask officials to look at and summarise 13 something of that importance, particularly as it turns 14 out they'd had it for about a year, so presumably they 15 could and should have read it in great detail, and when 16 I asked for an analysis of it, I actually should have

- had an analysis of it. But I didn't get that, and so
 I then moved on, and accelerated the work being done by
 the new Chair of Post Office.
- Q. Do I take it from that, Baroness Neville-Rolfe, that
 your reading of either the report or the identified
 paragraphs in the report didn't highlight to you that
 what you had been consistently told by Laura Thompson
 and others, that that second report had revealed no
 systemic problems with Horizon, was untrue?

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were actually quite well summarised in the note from POL
 of the meeting that I had, which obviously wasn't
 an official note.

Q. You tell us in your witness statement -- it's
 paragraph 88 -- that you received a briefing note from
 Laura Thompson. Can we look at that, please.
 UKGI00001067. Going back a little bit to 31 July, but
 it's a passage that I want to pick up, and if we scroll
 down, please -- and again -- yes, (6).

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"Individuals who have a criminal conviction already have a suitable independent route of appeal through the courts or the [CCRC]. That is the appropriate course of action for those individuals to take if they feel their convictions are unsafe."

Then over the page. Yes, nothing else on that. The briefing note appears to be advising you not to interfere in cases where there had been criminal convictions because that was a matter for the CCRC and the courts. What was your view on that aspect of the advice that you were receiving?

A. Well, obviously the line that I should respect the CCRC, who, at that -- you know, were well -- I think were well viewed at that time, seemed to me to be a reasonable one, especially as I'd been told by -- with -- including a letter from their General Counsel, that they weren't

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holding any papers, which actually turned out to be untrue. When you eventually read the Swift Report, you find there were sort of Deloitte papers and things, which I was completely unaware of, which other people hadn't had, and so the CCRC should be allowed to get on with it seemed to be not an unreasonable point.

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Having said that, I was -- and obviously, they were the particular population I was worried about, but, equally, there were these points by Second Sight that had been raised about how -- I mean, what seems to have been happening was the Post Office had an awful lot of lines for a poor subpostmaster in a small rural post office and so it was really, really important that Horizon worked properly when they, you know, had to deal with all of these things. And the Second Sight Report is quite good, and it takes you through all these different lines and explains the difficulties.

Now, if you've got a really good IT system and really good IT support, you can bring online new products and people who are selling them, you know, can be ushered in to making it work. But the Second Sight Report suggested that there were some wider problems, and we kept being told there weren't systemic problems but there were obviously, you know, bugs and the odd problems, as you can see from what the MPs were telling

recall feeling the pressure of the consistent advice from ShEx that these were not matters for Government and to hold that official line, but based on what I now knew, that was no longer a tenable position."

Had this happened in either your Civil Service or

political career to date, ie by mid-August 2015, the officials that were advising you were fighting you, they had lost objectivity, they seemed closed minded? A. I mean, the answer is no. I mean, I did deal with the Green Investment Bank -- and, funnily enough, that was ShEx as well, although a different cast list -- where we had a problem of trying to reassure people that green credentials would not be sort of completely lost, and the advice there was it was privatisation, so that was tough, eventually, we found a solution, which was to been trustees who were slightly outside the structure, and, you know, could be turned to, in the event of, I think, an onward sale or whatever.

But to start with, I'd found ShEx quite difficult on that subject, although we did get a resolution to that in the end. But, on the whole, you know, if you're clear you want something --

I mean, the other thing the officials do is go to the Permanent Secretary or go to the Secretary of State and, to some extent, obviously, there was this

me and, indeed, from the Second Sight Report. If you 2 could find the right bits.

- 3 Q. Can we turn back to your witness statement --
 - A. I'm sorry, does that answer your question?
 - Q. Yes, it does. Can we turn back to your witness statement, please, and page 34. In fact, if we start at page 30, and paragraph 110, you say:

"I did feel at this stage [that's mid-August 2015] that I was fighting ShEx."

Then if we go forwards, please, to page 34, you say: "By this time I had lost confidence in the quality of ShEx's advice. We were going round in circles, and they were unwilling to engage with the issues in the way I felt they needed to. In my view ShEx had lost objectivity, and its officials were unable or unwilling to scrutinise [Post Office] properly -- even though that was an essential part of their role. The advice they gave seemed close minded, deaf to the issues and constantly repeating the same mantra. As time went by I felt as though they were trying to obstruct, or shut down, my efforts to get to grips with the issues. This may have been connected in some way to a dogmatic belief that [arm's-length bodies] should be entirely free of Government interference; and certainly I was repeatedly advised that [Post Office] should be left alone. I do

understanding that there was operational separation, and that certainly had the endorsement of the Secretary of State, but I probably would have mentioned by frustrations, but the way I dealt with the frustration rightly or wrongly, I wanted to do something, was I moved forward and I got the new Chairman to take a look at this, I explained that it was, you know, reputationally and organisationally important for the

Post Office, and I encouraged him.

My recollection is I encouraged him actually to use lawyer, a QC, because that's what -- the sort of thing that I had experience of in the private sector. Where you've got a really big problem, if you bring an independent leading member of your profession, they provide clarity, they make sure you know what the facts are, and then that enables you to move forward and do the right thing.

But if what you're asking me about was had I lost confidence in ShEx advice, the honest truth I had, I tried at an earlier junction to get some Business Department officials to come along to a meeting and they sent along a lawyer. So I had a lawyer and I had two Special Advisers at the meeting but I didn't have, you know, a senior Business Department Official who I felt might be a little bit more understanding of the fact

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that you've got MPs -- I mean, MPs are really important in our democracy because they sometimes bring, you know -- they bring unwelcome bits of information to you. I wasn't an MP, but I was at a major retailer. We had the same system. You've got these letters coming in to the CEO, which were an excellent source of stones in the shoe, and that's what we were getting from these MPs, and I didn't feel that ShEx really wanted to listen to that

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They wanted to make sure that the line that they took prevailed, and they worked with POL to try and make sure that that's, you know, what I was being told. And then I bought in Oliver Letwin -- see paragraph 125 -which was obviously helpful.

15 Q. Yes. If we skip forwards to paragraph 239 on page 61, please, you say: 16

> "My relationship was mainly with Laura Thompson who was, for the most part hardworking, helpful and effective. However, she followed party lines decided above her by Richard Callard, the [Post Office] Board member, and others. In retrospect, ShEx was too close to [Post Office] for effective scrutiny and I was at times frustrated by their unwillingness to question the status quo."

Who within ShEx did you have concerns about, by

copies of all the exchanges I was having with Laura Thompson, who knew of my concerns. I mean, one difficulty we've got -- and I now know why -- is that we haven't got any notes of my meetings by my private secretaries, except where they ended up somewhere else and one of the documents you've just flashed up says it's not the responsibility of a private office to keep any copies; it's the responsible of the divisions.

So that's the problem we've got. Sorry, I'm not really answering the question, but those were the concerns I had. I think I had one meeting with Mr Russell, who was the top honcho, and that was later on -- I think he came to I see me to ask about how I'd found ShEx

15 Q. Given the concerns that you have mentioned in the 16 passages of your witness statement that I've shown to 17 you, in particular that ShEx was being obstructive, that 18 you had lost confidence in it, that it lacked 19 objectivity, what steps did you take to address those 20 issues?

21 A. Well, the main step I took was to ask the new Chairman 22 of Post Office to bring an independent person to have 23 a good look at the whole thing and provide us with 24 advice and then I pushed back on ShEx in the normal way, 25 where they gave me advice that I didn't like. But, you

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1 reference to the words "and others"?

2 Well, I had -- I didn't see much of Richard Callard but, 3 to the extent, I did have a little bit concern about 4 him, and clearly we've got -- we've had evidence 5 separately that he was working very closely to POL, 6 which I mean is understandable, he was on their Board. 7 And then I had this exchange with Mr McInnes, who 8 I think was -- I don't know where he slotted in but 9 maybe above Callard, and I'd asked him specifically for 10 a proper submission on Second Sight, and I ended up not

11 getting a reply from him at all, but getting a reply 12 from Laura Thompson, saying the same thing and

13 forwarding a piece of paper from POL, annexe B, which 14 was missing when I saw all these papers initially.

15 Q. What was the nature of your interactions with 16 Mr Callard?

17 A. I think he came to the meeting at the beginning of 18 August. I met him when I went on the away day in June, 19 because he was the Board member.

20 Q. Did you communicate your concerns directly to 21 Mr Callard?

22 A. Well, certainly on 4 August I communicated my concerns, 23 and he saw -- the thing about the Civil Service is 24 there's a lot of reading of paper, and civil servants 25 are very good at reading paper, and he was receiving

1 know, they were the officials. I had a go, at the 2 beginning of August, at bringing in officials from 3 elsewhere, but I was told that -- and remember, I was 4 a relatively junior minister, I was told that that 5 wasn't appropriate. 6 I mean, I did have updates with -- guite short 7

updates, always -- with the Secretary of State and I'm sure I will have -- I know I explained to him that I was planning this review by Parker, obviously, who he was 10 partly responsible for bringing in, which my 11 recollection was he supported.

Q. Was that Sajid Javid? 12

13 A. Yeah.

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14 Q. Did you ever consider -- escalating might not be the 15 right word -- but raising the problems that you were 16 encountering with the Permanent Secretary?

A. The honest truth is I can't remember but if I had had a meeting with the Permanent Secretary, which I did occasionally have at that time, I'm sure I would have said "Well, it's all very frustrating but what we're going to do is get -- we've got these two or three avenues, we're going to add the extra avenue of having an independent look at it by Parker, and he would have probably agreed that was a good idea".

You have to remember that I tried to be

constructive. I tried to actually do something, which was why I got this extra piece of work done, which I think, if it had become public, would have been extremely transformational.

- Q. Given your concern that the party line was being decided
 by individuals, including Mr Callard, did you consider
 it was appropriate for Mr Callard to have been the
 Government's representative on the Board?
- 9 A. I mean, that was not a decision for me. My 10 understanding of the structure was that I was 11 responsible for postal affairs, but who -- you know, how 12 the Shareholder Executive worked -- and, you know, the 13 Permanent Secretary sat -- the permanent secretaries, 14 I think, sit on the TopCo in the Shareholder Executive 15 and it is for them to decide who the individuals are. 16 It is important who the individuals are but it is not 17 part of the constitution that we, as ministers, you 18 know, decide which civil servants have which jobs. And
- Q. Which Permanent Secretary had functional responsible forShEx?

when that works well, that's fine.

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A. Well, that will have been the Business Permanent
 Secretary, who I think -- it was first Martin Donnelly,
 and then it became Alex Chisholm, but I think that
 was -- Alex came in with the climate change and energy

minutes over the phone tomorrow if there is time -- I appreciate it's her first day back but ... if we could find a slot, it's worth her being aware of [Lady Neville-Rolfe's] mood and position (not that there is too much to worry about)."

Can we look, please, at your witness statement at paragraph 102, which is on page 27. At the foot of the page, you say, "I have also been shown a copy of a chain of emails", that's the one I've just shown you. Then fourth line:

"Of course I did not see these emails at the time."

Then you start quoting from the email and, if we go over the page, please. You say:

"I find this troubling. This seems to me to be clear evidence that ShEx -- whose role it was to provide me and other ministers with objective and impartial advice, to scrutinise POL's actions and to hold it to account -- was taking steps to provide advance warning to [Post Office] about my concerns and intended direction of travel. I cannot see any good reason for them to have done so. I am sadly driven to the conclusion that ShEx and [Post Office], perhaps inadvertently, were in effect working together to try to deflect me, and that ShEx were not giving me the independent and impartial advice that I needed."

work, which was the time I was moved, so I think Martin
 Donnelly would have been the Perm Sec at that time.

3 Q. Thank you.

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4 A. I did have meetings with him on European issues quite a lot because one of the points I haven't made is 5 6 obviously, although the Post Office was very important 7 to me, I was quite heavily occupied on other matters, 8 notably going to Brussels, probably once or twice 9 a month. I think I was in Asia in this summer period on 10 intellectual property and, you know, that was the most 11 important -- those were the -- those, plus the Bills, 12 were the most important part of my portfolio, important 13 though this obviously is.

14 You've referred to having a meeting at the beginning of 15 August with Paula Vennells. Can we look, please, at 16 UKGI00005261. If we scroll to the foot of the page, 17 please. This is an email exchange not including you, 18 and is in the run-up to the meeting. The subject 19 heading is "Sparrow catch-up", it's dated 4 August 2015, 20 from Mr Callard to Avene O'Farrell, who is or was Paula 21 Vennells', essentially, personal assistant:

"... we had a catch up with Lady Neville-Rolfe today about Sparrow. Paula is seeing her on Thursday morning [that will be the 6th] first thing(ish) and I thought it might be worthwhile me having a chat with Paula for five

What was it about the communication between Richard Callard and Paula Vennells' office that led you to that conclusion?

A. I think he and Laura knew that, by that time, I was getting frustrated and wanted more done than the classic Post Office line and so he seems to be ringing them up, to say "Well, there's a meeting coming up", and, as it were, telling them in advance where I was going to come from so that they could prepare for that. That took the element of kind of surprise away from my meeting with Vennells, so instead of being able to take on Vennells, they would obviously pre-brief Vennells, the Communications Director, who was an ex-special Adviser, who will have obviously explained everything that she should do and I didn't really think, given there was a difference between us at the Post Office at that time, that that was a very sensible or wise thing to do. I mean, it is true, sort of Prime Minister's have Sherpas that talk to each other before meetings but, you know, that's where things are, you know, more -- there's more agreement coming along, whereas, actually, you know, this was a slightly rocky patch, and I think that

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aligned with the Post Office than was appropriate. But

showed a lack of judgement and a wish to be perhaps more

1 was trying to be a good NED to the Post Office, and he 2 was also trying to advise me. So I, you know, well, 3 I can perhaps understand it from that point of view. 4 But I think it was misjudged and it made me feel 5 slightly that those who were advising me have had a foot 6 in the Post Office camp, and it was one of the reasons 7 why, as I alluded to earlier, I wondered if we shouldn't 8 have some more classic Civil Service officials because 9 you remember that ShEx is very much made up of 10 commercial people -- Richard came from Deloitte. You know, they're all a series of people who have come in 11 12 from the private sector, which of course I do 13 understand, but it does mean that they're not so au fait 14 with these political difficulties which were obviously 15 facing at this time.

16 Q. Why did you consider that ShEx and the Post Office
 17 working together to try to deflect you was perhaps
 18 inadvertent?

A. Well, I was trying to -- obviously, I don't have -I don't have evidence except the evidence that you have
given me in those pieces of paper and, you know, they're
civil servants, they try to act with objectivity.
That's why I put "perhaps inadvertently". As it is,

I think, during the course to your inquiry, this thing
 that I wrote some weeks ago has become a little more
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Then under 1:

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"Since we spoke to you earlier this week, we have been exploring options to address the concerns you raised."

Then this:

"We have also been engaging with Post Office at a senior level to ensure [that] they are aware of your views."

Reading that sentence, "engaging at a senior level to ensure they are aware of your views", would you understand that that's a reference to the forewarning of Paula Vennells of your mood and position in the way that we saw in the email that we looked at before the break? Well, I think it's a completely fair point, that they

14 A. Well, I think it's a completely fair point, that they 15 did say that. I don't recall that at the time and it 16 says "aware of your views", so I suppose that's fair 17 enough. It doesn't resolve -- obviously it depends what 18 the exchanges were. It doesn't quite resolve the 19 problem that I was looking for independent advice, and 20 they knew that because my private office had been on to 21 them, saying that I wanted somebody outside ShEx to come 22 to the meeting.

Q. But the point that we take from this, would this be
right, is at least ShEx were being open with you --

25 **A.** Yeah.

1 believable.

MR BEER: Sir, thank you we're about to move to a separate
 topic. Can we break until 12.35, please.

4 SIR WYN WILLIAMS: Yes.

5 MR BEER: Thank you.

6 (12.23 pm)

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(A short break)

8 (12.35 pm)

9 **MR BEER:** Good afternoon, Baroness Neville-Rolfe. Can we 10 just go back --

11 Assuming, sir, you can see and hear us?

12 **SIR WYN WILLIAMS:** That is a correct assumption.

13 MR BEER: Thank you very much.

Can we go back, please, to the tipping off or priming of Paula Vennells and her staff about your concerns, your mood and your position in advance of the meeting. We looked at that email before the break and you expressed your concerns about it. Can we look, please, at UKGl00001067. We have looked at this note before but I want to ask you a couple of questions about a different issue. It's from Laura Thompson to you of 31 July, and you'll see that it refers, under "Purpose" to "ahead of our discussion with you and Nick King on Tuesday (4 August)", and "Timing: To see ahead of our meeting on Tuesday, 4 August".

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Q. -- about the fact of communication over "your views"
 with Post Office at senior level; it wasn't
 surreptitious?

4 A. That's true. From that note, yeah.

Q. But do I detect that you retain a residual concern,
 having read the email exchange between Richard Callard
 and Paula Vennells' --

8 A. I retain --

9 Q. -- staff?

10 A. I retain a residual concern, yes.

11 Q. Can we turn to the separate issue -- that can come down,
12 thank you -- you've mentioned it a number of times
13 already: the wish to have separate or independent
14 advice, ie separate from ShEx. Can we turn to your
15 witness statement, please. It's paragraph 99, which is
16 on page 26. Page 26, 99 is at the foot of the page.

17 You say: 18 "... I

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"... I had agreed to a meeting with Paula Vennells and Jane MacLeod on 6 August. As explained ... by this stage I was dissatisfied with the advice I was receiving from ShEx, and I wanted a senior official outside ShEx to provide support. On 3 August, my private secretary communicated to Laura Thompson my request for support from a senior official from outside [of] ShEx at this meeting."

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So here you appear to be saying that the request was for a senior official outside of ShEx to provide you with support at the meeting with Paula Vennells and Jane MacLeod on 6 August, correct?

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- A. My recollection was the main occasion on which I wanted someone from outside was on the 4 August meeting because we were looking -- we were trying to look forward at options, but I think the private office, perhaps rightly -- it was a long time ago -- took that as meaning that it would be good to have somebody there on the 6 August meeting. I mean, I think that might be the conflation of the two meetings. I'm not sure that that detail matters. It was more that I was hoping to have a different pair of eyes on the issues.
- Can I just persist with the detail modestly for Q. a moment, by looking at the email, because I think you may be right in what you're saying, that the independent assistance was for the purposes of the meeting on the 4th, not the 6th, UKGI00005195. This is the correspondence that you cited in paragraph 99 of your witness statement and if we look at page 2 first, please and scroll down, an email from Laura Thompson to your private office:

"Please see attached a short note to the Minister ahead of our meeting with her on Tuesday."

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"Just spoke to Harriet. She thinks [Baroness Neville-Rolfe] still wants a senior official outside of ShEx and not including whoever we get from Legal but is going to go back with the proposal of just three plus Legal and see what the Minister says. I asked Harriet to emphasis that we are taking the policy view not just the shareholder view."

So it would appear from your private secretary's email that the request from you was to have somebody from outside of ShEx present at the meeting on the 4th, ie the internal meeting on the 4th; is that right?

- 12 A. That's right but --
- 13 **Q.** Rather than the meeting with Post Office on the 6th?
- 14 A. But I only got half a loaf. I got a Legal Department 15 person and I got a more senior person from ShEx, and 16 I got Special Adviser.
- 17 Q. So leaving aside the detail point and getting back to 18 the point of substance, why did you request the support 19 of a senior official outside of ShEx for your meeting on 20 4 August?
- 21 A. Because, as I explained in my statement, by then, I was 22 beginning to worry about the advice that I was getting 23 from ShEx, which is very much a single track "everything 24 is fine", and I was seriously concerned about the sort 25 of points that the MPs who I met had been making, and 99

So Tuesday would have been 4 August.

Then if we scroll up, please, revised note sent through.

First page, please, at the foot of the page. And scroll a bit more, please. Thank you. Your private secretary replies to Laura Thompson:

"Thank you for the note, which [you had] seen. [You were] looking forward to the discussion at Tuesday's meeting. To ensure this meeting was as valuable as possible, she commented that:

"It was very helpful [to have] Nick King ...

"A lawyer would need to be involved ...

"... keen to have a list of the senior officials that would attend.

"Grateful if you could advise on who should be invited from legal. On point (c) ... I understand that Richard Callard and Anthony Odgers will attend. The Minister is still keen that a senior official outside of ShEx be involved given that part of this discussion is a policy one that may go beyond BIS's shareholder role. I would be grateful for your steer on how we can address this. I would like to go back to the Minister on this point this afternoon ..."

Then at the top of the page, an email from Laura to Richard:

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1 I felt that something extra needed to be done so that 2 the line that the things we got, which were the CCRC, 3 the mediation, the SS report, were not enough and that 4 we needed to do something extra. And I thought that 5 somebody from outside ShEx would be more open to that. 6

Q. Do you know why your request was denied?

A. I suspect it might be partly to do with the fact that it was August and probably nobody was around, you know, the cock-up theory of history, but also they obviously felt strongly they were going to do the policy view as well as the shareholder view and, you know, when you're a Government Minister, you know, you have to fight the battles you have to fight and we were nearly at the time of the meeting, and it was important that the meeting should go ahead, rather than wait to -- you know, sort of going round the office politics was not what I wanted to do. What I wanted to do was to actually get something done.

19 **Q**. So you attended the meeting in the end without the --

20 Yeah, I had --

21 Q. -- independent advice --

22 A. I had called the meeting. I wanted that meeting to 23 happen before the August break. I wanted to get on with 24 it and make sure that something was done.

25 Q. Can we turn to the meeting on 6 August with Paula

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Vennells, by looking at your witness statement, please, page 27, paragraph 100. You tell us that, in advance of the meeting, ShEx provided you with a briefing note and lines to take, which they drafted and which didn't reflect your concerns at the time nor your intended direction of travel. You say:

"I did not want to be told yet again about [Post Office's] side of the story; what I wanted to ensure was that there would be a fresh and independent review to see if issues with Horizon had been missed."

101, you say:

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"Regrettably, I understand that DBT has been unable to locate any minutes or other record of the meeting of 6 August."

Skipping a few lines, you say:

"Whilst I cannot recall whether I said [in the meeting] that I thought a QC-led (or similar) independent review should be commissioned, [you] might not have done as [you] had not yet spoken to Tim Parker

Referring to a letter four lines from the bottom, vou sav:

"... this does seem to suggest that I highlighted at the meeting the concerns by MPs previously, including that postmasters felt insulted by [Post Office's]

I mean, they sent me a big -- there was a big PowerPoint pack of stuff, some of which was extremely helpful, you know, like the detail on mediation, and things. So it wasn't all negative. But there was just this memory and I was encouraged to put this in, that I'd kind of felt slightly threatened at the meeting.

- 7 Q. From the Post Office side, what is your recollection as 8 to who led for them: was it Ms Vennells or somebody 9 else?
- 10 A. Well, Ms Vennells led but she kept -- she got 11 interrupted by other people when questions were asked. 12 You know often, if you're the leader at a meeting, you 13 make the points, you have a speaking note, and then you 14 bring your people in as and when you feel that that 15 would be helpful. It didn't feel like that. It felt 16 the other way round.
 - Q. Thank you. Can we turn to paragraph 103 of your witness statement, please, which is just over the page. You say you recall speaking to Tim Parker, probably later on that same day, 6 August, and you impressed on him that he needed to ensure that the Horizon issues were looked at again and taken seriously:

"I just wanted this sorted out properly and believed that he would realise that he and the other Board members had a duty to just that. I recall asking him to 103

approach to mediation. I do recall finding one of the [Post Office] attendees to be particularly overbearing and dismissive of my concerns."

Who was that?

A. I think it was either Mr Davies or Mr Bourke. I don't -- I haven't got photos of them but what I found

was that when I made points and made them to Paula Vennells, there was quite a lot of interrupting by them, 9 giving their view of things and, obviously, I was trying 10 to have a meeting with Paula Vennells to hear her views, 11 and not have the sort of insistent line of these people 12 who were kind of supporting her in this matter. You 13 know, I don't know whether it was -- whether it was the 14 General Counsel, she was obviously there as well. 15 I mean, she might have intervened.

> Just my memory of that meeting was that it was, you know, sort of almost -- there was a sort of threatening feel that I was trying to do the wrong thing and, you know, I should watch out. It was just, as I said, overbearing and dismissive of my concerns. I was passing on concerns that had been registered by people, you know, the democratic representatives, and I didn't feel -- I felt that they wanted to tell me what they thought the thing was, rather than, you know, explain why the detail of some of these points wasn't right.

bring in an independent QC or equivalent to head a review when he took up office, and he moved to do so soon after he took office."

You understand that the Department doesn't hold a record of that call.

So, by this time, you knew, ie early August, that Mr Parker was to take up the chairmanship of the Post Office.

9 A. Yes.

10 Q. You spoke to him and impressed on him the things that 11 you set out there. Why did you think that Mr Parker was 12 the solution or a solution to the outstanding issue or 13 issues?

Α. Because he was the new Chairman of the Post Office, he had a background which combined business experience, I think Clarks, Samsonite, various things. I mean, he was a strong candidate for this job -- and National Trust, which is more public sector kind of thing, and I think he was a Treasury official when he started in this life because I had briefly interviewed him early on in my time as a minister because when new appointments were being made to Boards it's classic that the people who come through the system, through the panel, then sort of have a cup of tea with the Minister, before the final appointment is made. And I was quite -- I have to

say I was quite impressed by him. I thought he had a sort of strength and dynamism and he seemed, when I spoke to him, to very much want to get to the heart of all of this

And I knew from my experience of running Boards that if you have a running sore like this, bring in somebody from outside, like a QC, or it can be a senior civil servant or I think somebody had suggested a captain of industry, which I think probably would work less well, then that was the thing to do. It was also a route to actually getting something done.

12 Q. Can we look, please, at POL00102551. This is your
 13 letter to Mr Parker of 10 September 2015, so about month
 14 later. You say:

"I am writing to you ahead of your taking up the role of Post Office Chairman to confirm our conversation last month regarding [Horizon]. The issues surrounding the Horizon IT system have not been resolved. Indeed, some of the MPs concerned have written to me again following the Panorama programme pressing the case for an independent investigation.

"The Government takes seriously the concerns raised by individuals and MPs regarding the ... Horizon system and the suggestions there may have been miscarriages of justice [and] also recognises the commitment that Post

the issues, whether it was to be conducted by him or somebody else and, if by somebody else, the nature or qualifications of that person?

4 A. I agree that it leaves it open. The letter was, of
 5 course, drafted by ShEx for me.

6 Q. Yes.

A. And I do recall the circumstances. A whole package came up. I think they'd all been cleared through the Secretary of State by the time they got to me, or anyway certainly by the time I was signing this. I think the letter could have added in something about deadlines, something about publicity, one or two other things, but -- and it's very much written from a ShEx perspective, respecting the ALB character. And I think that, actually, that balance is probably quite sensible, because, you know, if they were concerned, which they always were, about the commercial, you know, operation being separate.

But I had a lot of faith in a new chair coming in, who I thought, you know, would take a really good and strong look at this, talk to those concerned, do the sort of forensic work that wasn't appropriate for a minister to do and I wouldn't even have had time for it and the letter, you know, confirmed that that is what I'd asked him to through.

Office have demonstrated to resolving those issues, including through creating a mediation scheme and appointing independent investigators to scrutinise the system.

"As you will be aware, there have been some three years of scrutiny of Horizon and the [CCRC] is considering a number of cases which have been brought to it by individuals, and the Government cannot intervene in that independent process.

"As the sole shareholder ... the Government wants to make sure that the Post Office Network is successful and sustainable across the country. We recognise [it] is a commercial business and we allow it to operate as such but, of course, we expect it to behave fairly and responsibly in doing so. I am therefore requesting that, on assuming your role as Chair, you give this matter your earliest attention and if you determine that any further action is necessary, will take steps to ensure that happens."

Over the page:

"I look forward to hearing your conclusions and to working with you to secure the future of the Post Office Network."

Would you agree this letter did not specify how Tim
Parker should carry out any review or investigation into
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Q. Can we look, please, at POL00233179. This is an email exchange that you weren't party to, if we scroll down,
 that's the email from Rodric Williams, a lawyer in Post
 Office, to Patrick Bourke and Mark Underwood in Post
 Office, and he says:

"... see ... my starter for ten on Jane's speaking notes for her meeting with [Tim Parker]."

So this is ahead of a proposed meeting between Jane MacLeod, then General Counsel for Post Office, and Tim Parker, who would by then be Post Office Chairman. If you just look at number 3:

"The review will however be creditable if it is:

"Undertaken independently from the existing Post
Office team;

"logical in its approach; AND

"delivered against stated objective/s."

What would you say to the suggestion that the idea of independence, namely a review undertaken by Queen's Counsel or similar, came from Post Office and not you?

A. I mean, I think, when I suggested the thing, I was most keen on having some independence. I don't think I laid down specifically that it should be a QC because there were other options, such as a senior civil servant or, as I say, a captain of industry. But the key thing was to bring somebody in so that there was, you know,

an independence from existing PO teams. So I agree, to be honest, that seems to me a very fair point, and without, you know, sparing your brushes, if you bring a QC you know they will do a thorough job and that it will be objective and that the facts will be correct, and that they're quite good at marshalling lots of different pieces of paper and summarising things in a way that's understandable and, actually, I would say that the Swift Review, when I eventually saw it, did a lot of those things.

So I was entirely in agreement with Tim Parker, and delighted when he wrote to me very soon after his start date, saying that was what he was going to do. And Sir Jonathan Swift, who is now, I think, a High Court judge, seemed up and coming and a very talented person to do exactly what I felt needed to be done, and could be done, you know, at reasonable speed and then we could get on and do something which wouldn't take many years.

Q. If we just look over the page, please, at paragraph 6.

"Given the volume of material, [Tim Parker] is likely to need 'independent professional assistance' ...

"Subject to any procedural requirements, this could be:

"a solicitor:

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"with good document management and summarising

of 10 September. UKGI00006138:

"Dear Lucy

"Thank you for your letter of 10 September.

"Having had my first ... days of induction ... just last week, I am considering how to fulfil the commitment I gave you to take a fresh look at the Post Office's handling of the complaints raised ... in connection with Horizon ...

"To this end, and to promote the independence of the exercise, I propose to instruct a QC to advise me as to the appropriate scope of my investigation, how I might best conduct the necessary enquiries, and to assist me in considering how to present and, as necessary, act on my findings."

That refers to a slightly different role of the QC, doesn't it? The QC is going to advise on scope, the conduct and presentation of his, Mr Parker's, findings, rather than conducting the investigation him or herself?

Well, that might be so but, equally, when we eventually A. had the summary letter later on, explaining what he'd covered, it seemed to me to cover the right area. You have to put a certain amount of trust in a highly paid chairman to a Government ALB and, you know, bringing in a QC to advise seemed a good idea, and there's no suggestion that he's sort of just -- just leaving it to

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2 "from a firm which has not been instructed by the 3 Post Office ...

4 "which is on the Government Services Panel if we 5 want preferential rates ...

6 "or completely off panel if we want total 7 independence ...

"a barrister:

9 "likely to have a high level of independence 10 "BUT tend to be focused on forensics and outcomes 11 rather than process ...

12 "a management consultant:

13 "likely to be good at understanding the process ... 14 "BUT may not be able to opine on the suitability of 15 the process, or may focus on whether there is a 'better' 16 one

"a former civil servant ..."

18 Again, did the idea of independent professional 19 assistance come from you to Tim Parker way back on that 20 conversation in early August?

21 A. That was very much my recollection, that was exactly 22 what I wanted, as I say, and I reference that because of 23 my commercial experience at knowing how helpful that can 24 be to a Board.

25 Q. Can we look, then, at Tim Parker's reply to your letter 110

the QC, actually he's to assist me in considering both how to present and as necessary react on my findings. I mean, actually, I require -- I think that's a positive, rather than a negative, if I'm honest. I didn't have a concern at the time. I felt a certain weight off my shoulders that we were going to actually

And, of course, you have to remember that we're now -- we have an inquiry with hindsight. We did not know at the time that there had been these unsafe prosecutions. Everybody was telling me that Horizon was fine, that it was all fine. I was having to tell officials, who didn't like the idea that we were opening up, you know, possible criticisms of them -- they didn't like the idea that the things might have gone wrong. I had to remind them that we, as Government, you know, had to try to make sure the right thing was done.

So looking at the episode as a whole, you thought that 18 19 this was positive, in that he wasn't simply outsourcing 20 this, farming it out to a silk. The references to his 21 involvement in it were a good thing?

bring in somebody different.

22 A. They were. It's a balance. You've got the independent 23 QC coming along and doing a proper forensic job and then

24 you've got the Chairman following through and actually,

25 you know, doing what was necessary. That seemed to me

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2	MR	BEER: Thank you.
3		Sir, that will be an appropriate moment for the
4		lunch break.
5	SIR	WYN WILLIAMS: Yes.
6	MR	BEER: We will turn next to Baroness Neville-Rolfe's
7		meeting with Second Sight on 19 October 2015. Could we
8		do that at 1.55, please?
9	SIR	WYN WILLIAMS: Sure.
10	MR	BEER: Thank you very much.
11	(1.0	6 pm)
12	•	(The Short Adjournment)
13	(1.5	5 pm)
14		BEER: Good afternoon, sir, can you see and hear us.
15	SIR	WYN WILLIAMS: Yes, thank you very much.
16		BEER: Good afternoon, Baroness Neville-Rolfe.
17		Can we turn then to the meeting of 19 October 2015
18		with Second Sight and start with a bit of a run into it
19		by looking at some correspondence beforehand, beginning
20		with UKGI00005300. If we turn to the bottom of page 2
21		and on to page 3 thank you we can see there the
22		Ron Warmington email of 22 July to George Freeman that
23		we looked at earlier, the one that says, "Please look at
24		the following paragraphs of our second report, and the
25		statement that Second Sight in 2015 found no evidence of
		113
4		II amakhan ana fan mananana ahasild aina ka
1		" another one for response we should aim to
2		send a short response on Friday on the back of the
3 4		response to Ron Warmington."
-		Do you think you got personally to see this
5		exchange?
6 7	Α.	, ,
		during that August period that Warmington was disputing what Freeman had said.
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9	Q.	Can you recall what your reach was to Mr Warmington saying that Second Sight's Report had been
10 11		misrepresented in Parliament?
12	Α.	I think I probably sought advice, that's what I normally
13	Α.	did if I got something from outside like that. But
14		I think it also came in from the MP, it did, from Andrew
15		Bridgen, who obviously I had a lot of respect for. And
16		so, you know, that meant there was more work to do. It
17		confirmed my view that we should have somebody else look
18		at this.
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20	Q.	Had you by this time read the Second Sight second report to see for yourself whether what had been represented on
20 21		to see for yourself whether what had been represented on the basis of briefings to Parliament was correct or
21		incorrect?
23	Α.	I mean, at or around this time I will have got that.
23 24	Α.	I don't recall exactly when the full report was put in
— T		. Goli Cioodii Ondodiy Wiloli dio Idii Iopoli Wao put iii

my box, if I'm honest. And, remember, this was

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what that letter said.

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systemic flaws with Horizon is incorrect". If we scroll up, please, we can see that he, Mr Warmington, sends that on to David Cameron, on 28 July. Then scroll up, please. Then on 4 August, he sends it to you. "Dear Baroness, "Further to the article written by Tim Ross in this weekend's Sunday Telegraph [and he provides the hyperlink], I have as yet received no acknowledgement 10 from Westminster in regard to my 22 and 28 July emails 12 13 inaccurately briefed on the results of our firm's

"The possibility seems to exist that Mr Freeman was investigation. As stated below, we have concluded that there were, and probably still are, systemic flaws in Horizon."

Then if we go to page 1 and stop there, thank you. Andrew Bridgen says, in an email to your private office, of 5 August:

"Dear Lucy,

"I have been forwarding this email ... perhaps you could advise given the seriousness of this allegation that Parliament may have been misled by the Post Office."

Your private office send that to ShEx:

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1 a holiday period, we were travelling about, et cetera, 2 et cetera, but I had taken on board the seriousness of 3 it and we had spoken earlier about how, actually, quite 4 difficult it is. You look at the individual paragraphs 5 and it is quite confusing as to exactly what, but 6 there's certainly a problem there and that I was well 7 aware of.

- 8 Q. Did that problem being raised by Second Sight constitute a separate and independent reason for an independent 9 investigation being a priority? 10
- A. I think it certainly helped to stiffen my resolve. But, 11 12 as I've said, I thought the key things were well 13 articulated by the MPs that I'd seen and, indeed, by the 14 debate, which we haven't looked at in the House, there 15 was an Adjournment Debate a few weeks earlier, bringing 16 all of these things together. And then you've got the
- 17 Second Sight Report as well.
- Q. Thank you. That can come down. 18
- A. Although the Second Sight Report had been around for 19 20 a very long time and, as yet, I've still not had 21 a summary of it from the system.
- 22 Q. Can you recall what the system's attitude was to your 23 proposal to meet with Second Sight?
- 24 Well, basically, they always advised me not to meet with 25 Second Sight on the basis they were unreliable, they

didn't abide by confidentiality and their report that -they seemed to cling on to this key thing that they had
found that there was no systematic fault with the
system, but they then said that other things that they
were doing, you know, that they were not straight with,
which was a bit confusing, to me. And, as I said,
a little bit earlier, I actually really -- I found it
difficult to know what the key points in the Second
Sight Report were, particularly when I'd seen the
counter stuff from POL.

But what I would say is I think Second Sight were amazing in the way that they kept going. You know, year after year, they produced these reports, they thought that they were on to something. They got, you know, not much sympathy from the powers that be and yet they kept on trying and, obviously, they did engage MPs, which was the right thing to do.

Q. Can we move to closer to the October meeting by looking at UKGI00006142. At the foot of the page or the bottom half of the page, an email from Laura Thompson to Andrew Smith of your private office of 9 October 2015, and she says:

"Andrew

"I noted down for the team here the non-Horizon points from the meeting with the Minister, which I have

objections to your meeting with Second Sight, on the basis that meeting with Second Sight would risk undermining your independence and distance from the situation?

- A. I didn't really think that that was the case. I thought it was quite possible to have a meeting to hear what they'd got to say and encourage them to help Tim Parker with his review. So, you know, I'd said I'd see Second Sight as early as July. I'd reiterated that, I think, to James Arbuthnot when I saw him. They all felt Second Sight was very important and I didn't think that they should stop me -- that Post Office should stop me seeing them and, in fact, I think even ShEx agreed, perhaps warn down by my assistance, that I should see Second Sight, so I had a meeting with them.
- Q. We are going to look at ShEx's note in a moment where
 they, to an extent, in fact, echo the position taken by
 Post Office, at least initially.

Did it occur to you that Post Office's resistance might be motivated by a desire to avoid scrutiny from Government?

A. Well, certainly they were always trying to defend their
 line. That seemed to be their approach externally, and
 they seemed very paranoid about external matters.
 Indeed, I remember them being very paranoid about

attached ...

"On the Horizon discussion, the main points I took away were [as follows]."

So it seemed like you had a meeting at which Horizon and non-Horizon issues were discussed and this is Ms Thompson noting down, in the body of the email, the main Horizon points that she took away. Bullet point 1:

"[Post Office] wanted to flag their concerns around the Minister meeting Second Sight. They felt that doing so would risk undermining her independence and distance from the situation, and were also concerned that if news of the meeting were to leak to the media, it could risk individuals withdrawing from the mediation process (after considerable efforts by [Post Office] to get these in the diary). Paula was also concerned that the Minister's meeting might conflict with any meeting Tim Parker decided to have with [Second Sight].

"[You] noted Paula Vennells' views but felt it important to make the offer of a meeting to Second Sight and inform [James Arbuthnot] that [you] were doing so. [You also] suggested that the offer should be of a private meeting, and should happen quite soon, so that it would take place before Tim Parker invites them to meet."

Can you recall what you thought of Post Office's

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Panorama. Obviously, I'd worked in the private sector, I worked for Tesco, which was a company that, at that time, was very high profile and successful and we'd had Panoramas about ourselves, and all the rest of it, about you had to engage and, you know, the fact -- I mean actually, I agree that it should be a private meeting, probably, you know, to try and assuage Paula Vennells' concerns, but I did think the right thing was for me to see Second Sight, since they'd been, you know, making a lot of these points over a prolonged period and I couldn't really see why I shouldn't do that.

Q. You said there that that step might assuage Paula
 Vennells' concerns. Do I take it that you understood
 that Post Office's approach in this regard was being led
 by or taken with the approval of Paula Vennells?

A. Yeah, I think -- didn't I have a conversation with her about it?

Q. Yes --

A. Yeah, sorry. So she felt strongly about it herself -20 enough about it herself, not just her PR people, to
21 actually want to talk to me about it. So she obviously
22 felt strongly, presumably on the advice of lawyers, you
23 know, that this could somehow get in the way of some
24 legal arrangements, mediation, et cetera, to talk to me
25 about it and explain her concerns. I listened to those

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ot ... covering [his] ask that you meet Second Sight and Sir Anthony Hooper."

"Recommendation" is:

15 "That you:

"Decide whether you would like to meet Second Sight

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If we go down to paragraph 3:

"Mr Arbuthnot argued that, since you had received a briefing from Post Office on this matter, it was only fair that you should meet Second Sight and hear their side of the story. He invited you to judge for yourself as to whether Second Sight were as 'biased and unprofessional' as he felt they had been depicted by the Post Office.

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Second Sight?

A. I did. I suspect I had already decided before this memo came up. It's one of the things in Government that quite often submissions sort of come along to formalise a view, you know, on the one hand, on the other, and they've given me a reasonable, you know, run down and accepting that I should see Second Sight. So I'm seeing them -- I'm not saying I saw them -- the sort of implication is we're just seeing them to show it was 10 a good thing. I was actually interested in seeing them to hear from them what their view of Horizon was. 11

- You tell us in your witness statement that when Post 12 Q. 13 Office's objections came in, you "did not allow Post 14 Office's objections to deflect me"?
- 15 A. Exactly.
- Q. Is that how you saw the Post Office's intervention, 16 17 namely an occasion on which they were seeking to deflect 18
- 19 A. I think that's fair, yes.
- 20 Q. Can we turn to what happened at the meeting itself and 21 the sources for that are unfortunately quite sparse. 22 Look at your witness statement, please, page 39, 23 paragraph 143. Page 39, paragraph 143. It's at the

24 foot of the page. You say: 25

"I met [Messrs Warmington and Henderson] on 123

"4. The advantages of agreeing to meet Second Sight would be", and then they're set out: demonstrate the Government is listening; agreeing to maintain a positive relationship with James Arbuthnot; assuaging a concern that Second Sight believed that their findings are being misrepresented; and the position that no Government action is necessary since the CCRC is considering cases, mediation is ongoing and Tim Parker is considering the matter with a fresh pair of eyes would be stronger if you can say you have met Mr Bridgen, Mr Arbuthnot and Second Sight.

But then there are significant risks, it was said: the operational matter point in (a); more stakeholders in (b) "might have a reasonable expectation that Government will opine on the merits"; (c) a risk of briefing it out.

Over the page, 6, clearly a difficult judgement: "Our view is that on balance you should offer a meeting to Second Sight. The risks of doing so are significant, but we believe they can be handled if we are careful and robust in our messaging ...

"8. If you do decide to meet Second Sight we suggest a low-key approach with an email from your office to Mr Warmington ..."

Did you decide, therefore, that you should meet with

19 October 2015. I understand that, regrettably, [the Department] has been unable to locate any minutes or other record of the meeting. I recall listening sympathetically to the issues raised, but I do not remember much of the substance of the meeting: the meeting was certainly not a 'lightbulb moment'. I am confident I would have informed them of the Parker Review and that I had asked Tim Parker to meet them and that I encouraged them to raise these issues with Mr Tim Parker as part of that review."

Is that the limit of your recollection of the meeting of 19 October?

Α. Yes, the specific memory of that meeting, I can kind of remember the room I was in, and so on, but unfortunately there is no note of the meeting which makes it difficult. But what I do remember was, you know, they went through some of their points. Obviously, those were becoming to become familiar to me because there was a point about contracts, wasn't there, there was a point of Bracknell remote being able to fiddle about without a footprint, the thing that Mr McInnes had told me wasn't possible. You know, there were various things which they repeatedly said but their communication was not of a kind -- very decent people, quite right to keep going, but the communication was not of a kind that

created a lightbulb moment and that's my recollection.

However, by then, I felt that we were moving towards a solution and I encouraged them to talk to Tim Parker and to Sir Jonathan Swift about, you know, what their views were. I felt that this was the right way to get those concerns looked at and in play and understand whether the Post Office's long defence was correct or whether the Second Sight Report was correct.

- 9 Q. We gleaned something from what happened at that meeting 10 from paragraph 145 of the statement.
- Yeah. 11 Α.

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- 12 Because you cross-refer to a letter that you later wrote Q. 13 to Oliver Letwin MP?
- 14 Α. Yes
- You say of the meeting of 19 October: 15 Q.

"It was a helpful meeting and they raised a number of important points. I suggested they contact Tim Parker ... to follow [them] up. [He's] currently conducting a review ... and has appointed a QC to advise him. He is currently setting up meetings with the key parties and [you are] expecting him to update [you] with findings in the New Year."

I think that's all we know about the meeting of 19 October. Did you receive any periodic updates from Mr Parker about the conduct of his review?

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1 Obviously, I'd had that from him, which I noted. 2 I mean, the meeting in January, we had quite a lot of 3 issues to discuss, is my recollection. They probably 4 crowded out any discussion of Horizon.

Q. If we turn then to Mr Parker's letter to you of 4 March, POL00024913. We can see this is Mr Parker's letter to you of 4 March 2016. He cross-refers to your meeting on 26 January and says he had provided you with an update on the work he had undertaken with the assistance of Messrs Swift and Knight, to review the Post Office's handling of complaints made by subpostmasters about the operation of the Horizon software system, and sets out in the letter further information about the approach to the review, scope of work undertaken so far, and his initial findings, and outlines his plans to bring the work to a conclusion?

This is a long letter and we haven't got the space to go through it in detail, but on pages 1 and 2, under the heading of "Scope of the Review", you'll see that he sets out his objections to review the Post Office's handling of complaints made by subpostmasters regarding the alleged flaws in Horizon, and to determine whether the processes designed and implemented by Post Office to understand, investigate and resolve those complaints, were reasonable and appropriate. Do those terms of

I think during the next three or four months I had 1 2 meetings with him. I don't recall any letters or 3 anything from him but, from time to time, when I was 4 having a meeting on the Post Office, then Laura Thompson would send me a background brief as to what was 5 6 happening and I think I asked for a meeting in January 7 because I think somewhere -- at some stage or other 8 I was told that he was hoping to have some findings in 9 the New Year, so I had sort of pencilled that into my 10 mind as the time to take up the story again. Q. We can see that from paragraph 150, if we go over the

- 11 12 page.
- 13 Yeah, there we are, 26th January. Yeah. A.
- 14 Q. You had a meeting with Mr Parker, you cross-refer to 15 your own offices or ShEx's note. There were some 16 unrelated Horizon issues discussed, or issues unrelated 17 to Horizon, and he told you on Horizon that Jonathan 18 Swift "was about to report. He had found no systemic 19 problem".

20 Was the first communication in writing that you 21 received from Mr Parker about the Swift Report, or his, 22 Mr Parker's, review, a letter of 4 March 2016?

23 A. As far as I know, that was the first that I had anything 24 of substance, other than this it's all slightly --25 "about to report", and he found no systemic problem.

1 reference, or does that stated objective, accord with 2 your intention?

3 A. I think broadly. I mean, understand, investigate and 4 resolve -- the "resolve" is important too, and then if 5 you go down the letter, there are four areas which seem 6 quite reasonable ones to me. I mean, if you're 7 a minister you're not General Counsel for the 8 Department, you're not kind of fiddling about at the 9 margins -- what you want is to make sure that somebody 10 sensible is taking things forward. I thought the scope 11 looked all right to me, rightly or wrongly.

12 Q. Over the page, he says that he decided that the 13 particular focus should be on four matters: criminal 14 prosecutions; the Horizon system, ie the software; 15 support provided through training and helplines; and 16 investigations in the circumstances of specific cases.

17 Can you assist as to whether or not that looked 18 broadly satisfactory to you?

- 19 That looked like the right headings to me.
- 20 Q. He says, skipping a paragraph:

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21 "... that [his] advisers requested and were given 22 unrestricted access to documentation."

I'll skip over whether that's accurate or not:

"Numerous meetings were held between them and a range of Post Office staff and employees of Fujitsu",

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and he sets out the meetings that he had.

Then he sets out, for the rest of this page and on to page 3, the principal findings and recommendations. Did you understand that there existed separately from this document a written report.

6 A. Certainly not a final report. I mean, I think they 7 might even talk about a draft at some point. The way 8 I read this was that they were -- they'd made quite 9 a lot of progress and that they'd found these areas 10 where they needed further investigation, which actually, 11 to my mind, matched some of the things I was concerned 12 about and so were the MPs. So I thought it was work in 13 progress, and I was -- I think I asked for advice from 14 officials and they sort of said "You don't have to do 15 anything at this moment in time", so I was glad that 16 those various areas of further work were being carried 17

Obviously, what I didn't know but you're probably going to come on to ask me about, was this was a slightly rosy summary of the Swift Report --

21 Q. Yeah, I --

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- 22 A. -- in my view.
- Q. Yes, I may choose words differently than "slightly rosy". Can we go to page 4, please. "Next steps":
 "I have commissioned independent persons to

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1 kind of work in progress, that they'd got these extra 2 pieces of work to do, and that I would get a report from 3 the Chairman once that work was complete. He'd 4 mentioned May -- there was a Board meeting in May, 5 I think somebody told me, and clearly it's the sort of 6 thing that I would have expected the Post Office Board 7 to have a look at. But I was also aware that there were 8 some threads to follow up.

- Q. We know that, by this time, Jonathan Swift had provided
 Mr Parker with a copy of his final report. Do you know
 why Mr Parker did not state so in his letter?
- 12 A. I've no idea.
- 13 Q. Did you discuss -- did he mention that there was a final14 review report when you spoke with him?
- 15 A. I spoke to him in April, I think. I asked for advice 16 from officials, the officials said do nothing. I was 17 having a meeting with him anyway in April, one of my 18 quarterly meetings with him, and I don't recall him 19 saying that "I've got a final report", or anything of 20 the sort that I might have asked for. I recall him 21 saying that the work was ongoing in these two or three 22 important areas, some of which turned out to be actually 23 quite relevant to the court cases that eventually came 24
- 25 **Q.** Do you know why he did not, without request, provide you 131

undertake the necessary work ...

2 "I ... share your aim that matters should be drawn
3 to a conclusion as soon as possible ... I anticipate
4 I will be in a position to report back on the outcome of
5 the further work during May.

"I firmly believe that the focus and scope of my review to date, together with further work which I have now commissioned, will allow me to confirm that the processes designing and implemented by Post Office to understand, investigate and resolve those complaints were reasonable and appropriate, and that there are no further enquiries ... to be undertaken ..."

Two other matters:

"... as I have noted ... a number of subpostmasters
have made applications to the [CCRC]. That work is
ongoing ... Second the Justice for Subpostmasters
Alliance is reported to have received funding [and] no
claim has [yet] been issued."

Lastly, the last sentence:

"If you would like to discuss the review report with
 me, I would be happy to do so."

22 Given the context of the letter as a whole and that 23 last sentence, did you understand there to exist some 24 freestanding review report?

25 **A.** No, to be honest, I didn't. I assumed that this was 130

1 with a copy of the report?

- A. I've no idea but I think he's separately said it was
 something to do with legal privilege.
- Q. Was that the discussion -- was that a discussion that
 you had at the time, ie whether he could or could not
 provide you with a report --
- 7 A. No, not that --
- 8 Q. -- and, if not, why not?
- A. Not that I recall. The letter is after all -- at the
 beginning it says "This is legal privilege", and he sent
 to me under its legal privilege. So what's the
 difference between a letter which is legally privileged
- and a document that is legally privileged? I'm not
- sure. But, obviously, the fact that the two didn't
- 15 match was an issue that I don't know if Tim Parker
- 16 himself was aware of. He may not have been but, you
- 17 know, you have to read the longer report to see whether
- 18 the summary is -- it's not that the summary is wrong
- 19 it's more sins of omission.
- 20 Q. Did you actively seek a copy of the report?
- A. No, because I didn't have anything to do with the matter
 after I'd had the advice from Laura Thompson not to do
- 23 anything until April, and then we had a meeting in
- 24 April. Is there a note of the meeting in April?
- 25 **Q**. Um --

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- A. I don't think there is. 1
- 2 Q. I don't think there is, no.
- 3 A. No, sadly. But what I will have wanted, you know, I'd
- 4 asked him to do a review. I would have wanted the
- 5 conclusions of that review. I don't think it's
- 6 appropriate for ministers to suddenly see drafts of --
- 7 I mean, I'm thinking about other things that I've done
- 8 as a minister since, you know, you ask for a report and
- 9 you get the report in due course. You don't sort of
- 10 have iterations. That sort of undermines the
- 11 independence of the report almost, if it's being sent to
 - the minister in between.

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- 13 Q. If can we see a little of what was going on internally
- 14 POL00110382, and start with page 2, please. There's
- 15 an email of 19 February from Jane MacLeod to Tim Parker,
- 16 under the heading "Chairman's Enquiry":
- 17 "As discussed last week, we have considered the best 18 way for you to brief the Minister on the outcome of your
- 19 enquiry ... I expressed concerns that were we to provide
- 20 the Minister with a copy of the legal advice you
- 21 received from Jonathan Swift, there was a risk that
- 22 privilege could be lost and that the report could become
- 23 disclosable by BIS through FOI requests or similar. We
- 24 have also received a call from the Minister's office in
- 25 which they sought to understand how the reporting would
- 1 Q. The rest of the chain deals with the drafting of the
- 2 letter, which eventually became the 4 March 2016 letter.
- 3 Were you ever made aware, prior to Mr Parker sending the
- 4 letter on 4 March 2016 that Post Office had discussed
 - either with ShEx or your office their intended approach
- 6 of sending a letter that was claimed to be a summary of
- 7 the review's findings?
- 8 A. No.

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- 9 Q. Were you ever made aware that the full review report was
- 10 not to be provided, it was said, in order to preserve
- 11 privilege over it?
- 12 A. Well, certainly not at that stage. I think probably
- 13 never. I mean when I stopped doing it -- we'll come on
- 14 to this no doubt -- I thought the sort of follow-up work
- 15 was continuing because there was one or two quite
- 16 important bits of work by Deloitte and others, but then
- 17 it all got muddled up with the general court case by the
- 18 subpostmasters group but, you know, at this stage
- 19 I would have assumed that I would have -- would get the
- 20 full report in due course with recommendations as to
- 21 what to do, and recommendations on how we communicated
- that to Arbuthnot and others and how we communicated it 22
- 23 to the world at large.
- 24 After all, you know, my concern came from the points 25
 - that they'd raised with me a few months earlier, which
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- be undertaken. During that call it became apparent that BIS officials are also concerned as to the legal status
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- and positioning of any report received from you." 4 Those last two sentences suggest that people in your
- 5 private office were seeking to understand how the report
- 6 or reporting of the outcome of the review would be
- 7 undertaken and they said that BIS officials were
- 8 concerned about the status and positioning of the
- 9 report. Was that something in which you had any
- 10 involvement?
- A. Well, (a) I had no involvement and (b) having --11
 - obviously I was very concerned to read this at the time,
- 13 when the Inquiry sent me all these papers because it was
- 14 suggested that my private office were working behind my
- 15 back and not giving me full information. But I don't
- 16 think that the Minister's office reference is correct.
- 17 I think in the Minister's office, they mean --
- 18 Q. ShEx --
- 19 A. -- Ms Thompson. They were thinking she -- they're
- 20 getting muddled up between my private secretaries and
- 21 Ms Thompson, who didn't work for me; she worked for
 - 22 ShEx, and they may -- you'd have to ask them, you know,
 - 23 what they felt about all of that. This is just the time
- 24 when we got the referendum starting, isn't it so a busy
- 25 time for ministers.

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- 1 I'd -- was -- I was -- you know, I'd obviously continued
- 2 to be worried about.
- 3 Q. In his witness statement -- I'm not going to display it
- 4 now and that document can come down from the screen -
 - the cross-reference is WITN00690100, and it's
- 6 paragraph 93 -- Tim Parker says:
 - "Baroness Neville-Rolfe and her office was made aware of the approach being taken to the distribution of
- 9 the Swift Review to seek to maintain legal privilege."
- 10 A. Do you know what date that was?
- 11 Q. He doesn't cross-reference it. He simply says you and
- 12 your office were made aware of the approach being taken
- 13 to the distribution of the Swift Review to seek to
- 14 maintain legal privilege; is that correct?
- 15 A. Well, as I said when I looked at this earlier, I wasn't
- 16 convinced it was my office and I don't recall my office
- 17 coming in to say to me "You can't have this document".
- So either that's a mistake in the email, which refers to 19 your office and it's meant to mean ShEx --
- 20 **A**. Yeah.

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- 21 Q. -- or your office had kept something from you?
- 22 A. Correct. Why I said when was it, it was -- obviously by
- 23 the time you get to sort of July, it's then unclear
- 24 who's going to be Minister because we'd had a big
- 25 change, change of Secretary of State, and I lost the

- 1 Post Office brief in that carve-up, and they seemed to 2 think, even before I lost it, that I might lose it, if
- 3 you read the paperwork.
- 4 Q. Okay. You tell us in your witness statement that the 5 first time you saw the Swift Report was earlier this
- 6 year as a result of the --
- 7 A. Yes, it was during the Inquiry when the documents came
- 8 through and, obviously, I was very interested to see it.
- 9 Obviously the letter I'd seen but not the Swift Report.
- 10 Q. Did you compare the report with the letter?
- A. In preparing for this Inquiry I did. 11
- Q. What view did you take in comparing --12
- 13 A. Well, I took the view that it was a bit, you know, it
- put a positive gloss --14

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- Q. I think it's paragraph 166? 15
- 16 A. I think I've dealt with it in my inquiry -- so there was
 - two -- there was a generality that it seemed to be
- 18 saying there wasn't too much of a problem in spite of
- 19 the fact that there was all these extra areas to be
- 20 explored, and then there was stuff that particularly
- 21 concerned me about how prosecutors had tried to do deals
- 22 with people who were being prosecuted by getting them to
- 23 accept false accounting, you know, as a quid pro quo for
- 24 dropping theft charges, and that came out -- I think
- 25 that's 100 to 109 of the Swift Review.

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charging theft and false accounting, it did not refer to the important and strongly critical findings in paragraphs 100-109 ...

"These specific findings should have been brought to my attention.

"I was surprised and disappointed to discover, years later, that Mr Swift's findings were not disclosed as part of any criminal or civil proceedings. I do think this is nothing short of scandalous."

What action would you have taken if you had been provided with the raw material, ie the Swift Report

Α. Well, I would have read the report, I would have seen those paragraphs and other paragraphs, and I would have wanted to take steps to make sure that this duty of disclosure was implemented. I mean, when I came in, I asked about documents. I was told by the MPs that people were destroying files. I tried to make sure that that didn't happen, and yet here we've got an instance where things are not being disclosed. And I think you've found, Mr Beer, as part of your other hearings with Fujitsu and others, that there was material. In fact, the -- some of the Deloitte stuff was referred to in Mr Swift's report, but not in the covering letter, as

Q. If you look at -- if we display it on the screen,

2 because there's a quite neat summary -- your witness

3 statement at page 45, paragraph 166.

4 A. Yeah.

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Q. Page 45, paragraph 166. You say:

"Even more importantly I now see having had access to the Swift Report, that Mr Parker's reassuring summary of the report was materially misleading. Specifically, it failed to make any reference to the important points made [by Mr Swift (sic)] in paragraphs 145-147 ... which concern remote access and directly undermine the information provided to ministers and, in turn, Parliament, and indicate serious historic and ongoing concerns as to [Post Office's] compliance with its disclosure obligations in relation to criminal prosecutions and convictions. This contradicts the assurances given in the second paragraph of the Criminal Prosecutions section of Mr Parker's letter, 'I am satisfied that Post Office has adopted a proper approach to disclosure such that it satisfies its duty of disclosure as [a] prosecutor'. All this touches on my key concern which was that postmasters should be able to secure justice through the CCRC process.

"Similarly, whilst it refers to further work commissioned in relation to [Post Office's] tactic of 138

1 So what you've got is some really quite explosive 2 material in that detailed report which should have been 3 referred to in the letter to me, in my opinion.

4 Q. Well, in particular, would you agree, since the relevant 5 Deloitte report was then two years old in the tooth, and 6 that report had itself been provided to a number of 7 senior executives and a summary of it had been provided 8 to the Board?

9 A. Absolutely, and there was almost a suggestion that that 10 was new material, I think, that Swift had got hold of.

11 Sorry, we hadn't got up the Swift Report but, for those

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involved in the Inquiry, I think it makes extremely good

13 reading because it summarises a lot of the background 14

very well and, frankly, it would have been good, you

15 know, for everybody to have had that summary made

16 available much more broadly, including, I would suggest,

17 to the Board of the Post Office.

Q. To what extent did you have any dealings with Jane 18 19 MacLeod?

20 A. Well, I think she came to the meeting on 6 August with 21 Paula Vennells. I think that's my only dealing with her

22 that I'm aware of

23 Q. Therefore, would that be an insufficient basis to form

24 a view or impression of her?

25 **A**. It would and I know she hasn't given you evidence, which 140

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far as I can recall.

1 is a pity because obviously a lot of the work she did 2 touched on these issues that are so important to the 3 subpostmasters --

4 Q. Exactly --

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- 5 A. -- who are in the firing line on all of this.
- 6 Q. -- and Mr Parker said it was Jane MacLeod who told him 7 that he couldn't disclose the Swift Report to you.
- 8 A. Well, there you are.
- 9 Q. Can we move forwards, please, to a draft letter, as 10 I think it rightly is called, of 21 June 2016, and turn 11 up paragraphs 180 to 181 of your witness statement, 12 which are on page 48. You tell us that you have had 13 sight of an unsigned draft letter of 21 June from Tim 14 Parker to you. In it, Mr Parker says that Post Office:

"... 'has received very strong advice from Leading Counsel that the work being undertaken under the aegis of my review should come to an immediate end, and instead address the issues through equivalent work taken forward in the litigation ... I have therefore instructed that the work being undertaken pursuant to my review should now be stopped'."

You say the first time you saw this draft letter was in preparation for the Inquiry. A FOIA request said that they couldn't locate any information that the letter was in fact sent to the Department. You are told

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So I was -- I mean, I thought -- I described it as scandalous but I also think it's very surprising and I don't know -- obviously you'd have to ask the counsel that was involved in that litigation, you know, why it wasn't made available to anybody.

Q. Thank you. That can come down.

You make a number of observations in your statement by way of reflections. You say that Government cannot function if ministers are unable to trust the information that they are provided with by officials. You say that you were, by mid-August, fighting ShEx, that you had lost confidence in the quality of ShEx advice, that they were trying to obstruct or shut down your efforts to get to grips with the issues, that you had lost the confidence in your civil servants on matters relating to Post Office and Horizon.

Did you ever escalate any of those matters to the Secretary of State?

19 A. I think I told the Secretary of State in August that I was unhappy and that, therefore, I was calling for 20 21 a review by Tim Parker, and that my recollection is that 22 he supported that, that it could get to the bottom of 23 things, you know, in a reasonable way. You know, so --24 sorry, so -- and then -- I mean, I think, at updates, 25 which are unrecorded because of the problem of lack of

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1 by the Department that it has no record of receiving it 2 and you're confident you didn't see it at the time; is 3 that right?

- 4 A. That's right. I was amazed when I saw it, to be honest.
- 5 Q. How, therefore, in the absence of that letter, was the 6 work that was outstanding from the Swift Review, that 7 was summarised in the 4 March letter, rounded off for 8
- 9 A. Well, it wasn't really rounded off. There was, in the 10 briefing that I got in July, they said well, they were 11 looking at how the Swift Review stuff fitted in with the 12 civil litigation, which I think was perfectly reasonable 13 to look at the two alongside each other. But obviously, 14 I never had any advice on what then happened as a result 15 of that. What I discovered, you know, a couple of years 16 ago or whenever -- partly when looking, I think, for the 17 Inquiry, and partly I discovered that, you know, the 18 Swift Review had basically been buried, which I was 19 quite surprised by, because when you have legal cases, 20 there's huge processes of discovery -- I mean, I know 21 this from my background at Tesco -- there are huge 22 processes of discovery for documents, and you have to, 23 as a -- your lawyers have to make sure that things are 24 made available that may help, you know, the people

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1 records, I might well have mentioned my concerns and, 2 you know, getting stuff done on this issue. And I think 3 I had an update with Mr Russell at some point, who was 4 the CEO, and I think you showed me a piece of paper just 5 before I came in this afternoon which actually is quite 6 helpful because, for the first time, I can see I did 7 raise it with the Permanent Secretary, as an issue. 8 Perhaps you're going to show me that.

9 Q. In fact, somebody else is going to show you that and 10 they ask that you be shown the piece of paper, so --

11 A. Oh, thank you. Let them ask me.

bringing the case.

12 Q. -- I'll let them do it.

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13 Were they the alternative possibilities, of raising 14 your concerns with the Permanent Secretary, Martin 15 Donnelly; the Chief Executive of ShEx, Mark Russell; or 16 the Chair of the ShEx Advisory Board, Robert Swannell?

17 A. Well, if you look at a lot of the papers, they're copied 18 to the Permanent Secretary, they're copied to the 19 Minister's office, they're copied to Mr Russell. And in 20 the Civil Service, that's, you know, I was -- used to be 21 a civil servant -- that's the way senior civil servants 22 like Permanent Secretaries get an eye on things. They 23 get a lot of paper that they sift through and, as it 24 happens, I did recall having a bit of a moan to Martin 25 Donnelly and, actually, he did something about it, as

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this document we're going to come on to discuss shows.

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Obviously I felt happier once Tim Parker had taken on the mantle of bringing in an independent adviser to look at the complications, and, you know, although we've focused on the negative from ShEx, you have to bear in mind that, in my Post Office brief, I was looking at lots of different things, transformation, the accounts, visiting post offices, you know, how -- what was their strategy going to be go forwards? So they didn't have to have so much of the taxpayers' money but kept the network which was so vital to local communities going.

So, you know, it wasn't all negative but, clearly, on this Horizon thing, they seemed to be particularly narrow and, as I've said several times when I asked for detailed advice on the Second Sight Report towards the end of August, I didn't get a submission as I should have done outlining the various accusations and what we as the Department thought about those. I got a defence document from the Post Office.

MR BEER: Baroness Neville-Rolfe, thank you very much for answering my questions. That's all of the questions that I propose to ask.

There are, I think, a number of Core Participants that wish to ask questions. I know that Mr Henry has 15 minutes or so, maybe if we start with those, that 145

1 appears to be endemic within the UKGI on this subject? 2 Do you regard this as something which has hampered you?

A. I certainly do. I think it's very unfortunate and, if you look at one or two of the documents, it says at the bottom: "It isn't the private office's responsibility to keep documents; it's your responsibility as the advising division", which I found quite surprising.

I mean, latterly, I've been a Cabinet Office Minister and I asked my staff what they did about records and they explained that, every three months, they send off a pile of papers to the archives.

12 Q. Right. So this appears to be unusual?

A. So it may be that it's unusual. I mean, it's not something that I can really comment on. It's more for the civil servants in charge of records. But it has certainly been very unhelpful for me and, I think, for other Ministers, that they haven't been able to see the contemporaneous notes. You know, has one forgotten important things? We've all tried our hardest, I'm

20 sure, but it's quite difficult. 21 Q. Right. I now want to go to a document which is UKGI00019859. While it's being put up on the screens, 22 23 one of the themes that has dominated the Inquiry has 24 been the constant refrain, "We had every reason to believe Horizon was robust. We were told this by the 25

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will take us to the break at 3.00.

Questioned by MR HENRY

MR HENRY: Good afternoon, Baroness Neville-Rolfe.

4 It is often said that openness is the first casualty of a project that is in serious trouble, and you 6 wouldn't disagree with that observation, would you, given your experience with the Post Office?

- 8 A. No, and generally -- obviously, I come from a background 9 in business where your working assumption has to be 10 that, you know, that things do become public and it's 11 better to --
- 12 Q. Exactly. One paragraph among many, but early on in your 13 statement, was striking, and it was your paragraph 5, 14 which reads:

"I would like to emphasise that a large number of documents which would have been helpful in preparing this statement, such as the minutes of several meetings in my Ministerial Diary, have not been made available to me. This is perhaps because, in 2016, the Shareholder Executive and its staff and records were transferred out of BIS to become part of the newly formed UKGI and, in the same year, BIS was merged into a new department."

This is a refrain at paragraphs 31, 42, 101, 143 and 177 of your witness statement. Given your experience in Government, how disturbing is this loss of data which 146

Post Office. We were told this by ShEx".

You, however, did not believe that, did you, Baroness Neville-Rolfe, because in this document you expressed the view that it was probably one of HM Government's IT debacles, and we can scroll down. We have Richard Callard at the top, but then it's from Tim McInnes. Do you see the second bullet point:

"As she's [that's you, Baroness Neville-Rolfe] mentioned before, she thought Horizon was another example of a Government IT debacle and that innocent subpostmasters were the victims."

Then Mr McInnes says, and this is 12 June 2015: "Clearly this is wholly untrue in two respects,

probably untrue in a third."

The general tone of this -- I don't want to distract you -- is slightly derisory or slightly mocking but I don't want to distract you with that. But what I want to explore with you is why you thought that; why you harboured the suspicion that Horizon was another Government IT debacle. Would I be right in suspecting that part of your scepticism no doubt came from your personal experience in business?

A. I think so but also my experience of Government IT systems. You know, there'd been police computers, various different IT things, and Government do seem to

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- 1 find -- or did -- perhaps did seem to find -- you know, 2 getting IT systems right very difficult.
- 3 Q. Very difficult.
- 4 A. And, you know, a key to having good systems -- it's been
- 5 my experience, partly as a non-exec in other companies,
- 6 but also a little bit when I was at Tesco -- is you've
- 7 got to have really good induction, training, helplines
- 8 and learn from mistakes as you go along, because it is
- 9 inherently difficult, bringing in IT systems and I have
- 10 to say that the Horizon system, if you look at the
- 11 Second Sight Report, had to do an awful lot of stuff.
- 12 **Q**. Yes.
- 13 A. And I'm sure that the IT providers will have known that.
- 14 They were obviously experienced IT providers in lots of
- 15 areas. But, you know, I came -- I suppose it's fair to
- 16 say this was very early on and it probably irritated
- 17 officials -- but I came in with a certain questioning --
- 18 questioning of IT and I would have wanted to hear why
- 19 there weren't the sort of problems that we'd seen in
- 20 some of these other areas, from my recollection of when
- 21 I worked in Government and --
- 22 Yes, and, of course, you'd served in Government in the
- 23 1990s and you'd served in Government --
- 24 Α. Exactly.
- 25 -- from, I think it's right, 2015 onwards?

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- 1 bugs and things to start with, and so you've got to have
- 2 really good support and training and helplines, and help
- 3 people.
- 4 Q. And an openness and a commitment --
- 5 A. Exactly.
- 6 Q. -- to get it right, as opposed to covering it up?
- 7 A. Absolutely.
- 8 Q. I mean this, of course -- notoriously, Horizon grew out
- 9 of the problems that the DSS had had with it, had it
- 10 not?
- 11 A. I don't think I know the background to the -- the early
- 12 background to Horizon but that sounds quite likely
- 13 because, after all, they were -- you know, there was
- 14 this question of making payments to individual benefit
- 15 claimants, ves.
- Q. So to this refrain, where we were being told that it was 16
- 17 robust, you certainly weren't gulled by that, and the
- 18 wool wasn't pulled over your eyes by that, hence your
- 19 scepticism and the fact you were probing?
- 20 A. I tried to probe but I also tried to take advice because
- 21 the Civil Service has to work on the basis that
- 22 officials set things out in a cool and sensible way for
- 23 the attention of Ministers, offering them options, you
- 24 know, considering what needs to be done in the public
- 25 interest. I know that because obviously, to some

Well, until I went to Tesco in '97, I worked in

2 Government latterly in the Cabinet Office, and in the

3 Business Department, and in Number 10. Then I had

15 and a half years in business. Then I joined the

Lords and I became a Minister in 2014. And then I was 5

6 a Minister for about three years and then, after the 7

referendum, I went on the backbenches, and then I've 8 been back being a minister.

9 So I'm quite unique in having had such a lot of

10 different experience: business, Civil Service and

11 several ministerial departments. So I suppose I thought 12

it was a fair comment to talk about IT debacles, even if 13 the Shareholder Executive obviously found that

14 exceptional.

15 Q. So, therefore, it's within your direct knowledge that

16 Government had suffered notorious problems with IT

17 systems for decades?

- 18 A. Yeah.
- 19 You mentioned the police. There was also. I think it's
- 20 right, the Inland Revenue had difficulties with IT
- 21 problems?

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- 22 A. They did, and especially moving to self-assessment,
- 23 although, actually, in time, they sorted them out. So
- 24 it was very bad to start with and then gradually it got
- 25 better. I think that's the problem. You get a lot of

1 extent, I had residual Civil Service values in my DNA.

- 2 O. Could I now move to the role of the Civil Service,
 - because you once said in the House of Lords:

"My Lords, having had previous responsibility for

5 the Post Office, I am very well aware that ministers are advised to stand firm on seemingly solid grounds, only

6 7 for it to become clear in the long term that that is not

defensible."

9 Now, you may have heard the Right Honourable Pat

10 McFadden's suggestion regarding a new body to

11 investigate potentially rogue arm's-length businesses.

12 What would you suggest, however, be done about

13 potentially reckless advisers and officials who seemed

14 to have lost their objectivity and upon whom you relied?

15 Right, well, that's quite a big question. I mean, off

16 the cuff, a couple of points. One, I think it's

17 incredibly important to have the right people in jobs.

18 So you need good performance culture. You need to hire

19 the right people. You need to give them feedback when

20 they're not there. I think, as an ex-civil servant,

I mean, the role of the Permanent Secretary is also 22 important. So, if you think about financial matters, if

23 ministers ask civil servants to spend money that they

24 think is poor value for money, then the Perm Sec can

25 object and they send a memo that -- you know there has

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to be an instruction from the Permanent Secretary to the -- from the Minister to the Permanent Secretary saying, "I, the Minister, think it's right to do this, even though you've expressed some reservations".

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Q.

I mean, rather than setting up a whole new department to do this sort of thing on the off-chance that there might be -- I hope never -- repeats of this sort of thing, my only thought is: is there some way that you could, you know, bring that kind of thing into play and people would then know that, if their work was a problem -- I mean, obviously, you can always go to the Secretary of State. That is the sum role of the Permanent Secretary. I don't know exactly what Pat McFadden said. I'm sure he was trying to be helpful. So is there anyone you could have depended upon independently, at the time, to validate the truth and honesty of important ministerial statements before you made them, to prevent the mischief that you were speaking of in the House of Lords, that ultimately those

20 statements had become untenable? 21 A. I mean, the truth is that, as a politician, you are 22 extraordinarily aware that anything you say on the 23 public record in the House, whether it's the Lords or 24 the Commons, has to be accurate. And there are 25 well-established processes for correcting the record, if 153

Q. Can I come to that because, of course, one such recruit was Mr Callard, and the final document for you, 3 Baroness, is UKGI00017443. This is an email that Mr Callard sent on 18 November 2015. Could we go to 5 Mr Callard's email, which is, I think, on page 2. It's 6 18 November 2015 at 18.25. Yes, thank you very much.

This is in response to you expressing some dismay with the way you had been informed of matters, and this is Mr Callard stating that he believed that you'd been a bit harsh:

"The problem is we cannot deliver what she [that's you, Baroness] wants (a green-locked GIB, and a Post Office without a perceived but non-existent IT problem). Bit harsh from my perspective, we've kept a lid on the latter", he says.

So in other words, "We've kept a lid on the Post Office".

Baroness, given everything that you instituted, did you want Richard Callard to keep a lid on the subpostmasters' dispute with the Post Office?

- 21 A. No, I wanted to get to the bottom of the matter and the 22 truth of the matter.
- 23 Exactly. So what he's done there is precisely the Q. 24 opposite of what you wanted, isn't it?
- 25 It does seem to be. Obviously I hadn't seen this at the Α. 155

you have to do that. I mean, that arose during Covid, of course, didn't it?

So, I mean, the answer is you have to try and find a way of getting at the truth and, if you find out that the truth hasn't been communicated, then you have to correct the record. I think, if Sir Wyn is thinking about what might be done for the future -- and I think you've got a further sort of whole module on this -- you need to just have a think about how this would work in practice and whether there would be perverse effects to bringing in a whole new sort of tier.

I mean, the key thing, in organisations where you've got people who aren't very good, what happens is you move them. You move them on. In the Civil Service, the Civil Service -- the appointments are rightly for the Civil Service, rather than for the Ministers, to avoid, you know, inappropriate -- or, you know, people having their friends in the wrong places, and I think that is valuable, that independence of the Civil Service.

So I think you need to look at this particularly in the light of ShEx, where you were bringing in a lot of people from outside the Civil Service, and it might be that you could do more to help them, to induct them, to make sure that their sort of -- their reports are looking properly at what might go wrong.

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1 time, and I had taken steps to say that I would like 2 more political handling, as you can see from the 3 subsequent memo in this area and in the Green Investment 4 Bank -- which also, as I said earlier, involves, you 5 know, people from outside who come in, and that's great

6 that they come in and bring their expertise, but it's

7 also important that you follow the values of --

Q. Government? 8

9 A. -- of transparency, truth, and Government.

MR HENRY: Yes. 10

11 Thank you very much, Baroness.

SIR WYN WILLIAMS: Thank you, Mr Henry. 12

So we'll have our break now, Mr Beer?

14 MR BEER: Sir, can I just check with the Core Participants

15 how long they will be?

SIR WYN WILLIAMS: Yes, of course. 16

17 MR BEER: If it's a short period of time, then it might be

18 that we can survive without a break.

SIR WYN WILLIAMS: Yes, sure. 19

20 MR BEER: One Core Participant, five minutes.

SIR WYN WILLIAMS: Then we will have our five minutes. 21

22 MR BEER: Thank you.

Questioned by MR JACOBS

24 MR JACOBS: Good afternoon.

25 A. Good afternoon.

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Q. I don't know if you can hear me. I represent a large number of Core Participants, subpostmasters and subpostmistresses, who were affected by this scandal. Mr Beer asked you about your reflections. Mr Henry took you to some correspondence involving Mr Callard. I have a couple of very brief further questions.

You've said in your evidence that you believed that you were being misled. You've also said that you believe that ShEx and Post Office were working together to try to deflect you. We have that email where Mr Callard was trying to arrange a meeting with Post Office officials to talk about a forthcoming meeting with you and the Chief Executive, and to gauge your mood and what it is that you wanted to do. So they were colluding and talking about you behind your back, effectively.

It's right, isn't it, that your experience is that ShEx were far too close to the Post Office?

- 19 A. I think they weren't taking in alternative sources of 20 information. I mean, clearly, they were going to have 21 to be close to the Post Office because the Post Office 22 had all the facts on individual cases.
- 23 Q. But they lost their objectivity?

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24 My worry was that they'd lost their objectivity in all 25 of that. That was at the heart of the problem, I think. 157

meeting just to say hello to people.

Because it's very different, and what you have to do in the public sector is a bit different, I think it's very, very important that they should understand that, and that, obviously, was an understanding by Mr Callard. He felt that it was important to keep the lid on but, obviously, as a civil servant, it's not only keeping the lid on; it's also making sure that you're doing the right thing.

- 10 Q. In terms of public duties and serving the public, did 11 you perceive there to be any ethical difference between 12 ShEx officials and the rest of the civil servants who 13 you worked with?
- 14 A. I don't think we discussed ethics but they obviously 15 took a very narrow, focused view, linked to their duties 16 in terms of the commercial and strategic vision for the 17 POL, and didn't seem to focus so much on classic 18 governance issues like, you know, the risk from these 19 prosecutions, which would be something that, as a civil 20 servant, you're always looking at the downside, as well 21 as the commercial opportunity.

I mean, having said that, they were trying to move forward. Paula Vennells, to give her credit, reduced the deficits in the Post Office. So the Post Office must have been doing something right at that time. 159

Q. I just want to clarify a point, it may have already been 1 2

made, but it just seems to be quite an important point.

3 You made a distinction, at 12.20 this afternoon, that

ShEx was made up of commercial people and not classic

5 civil servants/Civil Service Officials. Do you think

6 things would have been different, from what you

experienced, had the body charged with oversight of the

8 Post Office been composed of classic Civil Service

Officials? 9

10 A. I'm not sure that they would have had the expertise to 11 hold shareholdings in things like the banks and the Post 12 Office, and things, without commercial expertise. I'm 13 not against commercial expertise. I think what I was

14 saying is that that's not necessarily sufficient. 15 I mean, having said that, there were some -- I mean,

16 Susannah Storey, who I think you're seeing later, whom 17 I know from DCMS, I mean she was a civil servant of the 18 classic kind. So there was a mixture. But they --

19 I think that -- I think -- I'm not sure the Civil

20 Service is as good -- I remember when I went to work in

21 the private sector, the whole of my first month was

22 induction, and I had three-hour meetings with all of the

23 key directors -- three-hour meetings, which I couldn't

24 understand. The difference, when you go to work in

25 Civil Service, is you're lucky to get a 15-minute

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- 1 Q. Finally, Baroness, this narrow view, this lack of focus on more public interest-type problems, such as 2
- 3 prosecution, is that, on your evidence, the fault in the
- 4 system which prevented you from being able to carry out
 - your ministerial duties in terms of receiving the right
- 6 information?

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- 7 I think it was also to do with the particular
- 8 individuals because I gave them lots of openings,
- saying, you know, "What's in the Second Sight Report?" 9
- 10 If I had been, my previous self, sitting in that seat,
- 11 I would have gone away and I would have read the whole
- 12 of the Second Sight Report and I would have gone through
- 13 all of the negative findings and I would have then
- 14 wanted to do my own job, understanding what was right
- 15 and what was wrong. That wasn't done.

What they did was take advice from the Post Office because they felt the Post Office could give the answers and that isn't what you do. As a good civil servant, you bring -- you look at different -- you know, you look at different sources.

21 MR JACOBS: I think that's answered my question. I haven't 22 other questions for you. Thank you.

23 THE WITNESS: Thank you.

Questioned by SIR WYN WILLIAMS

25 SIR WYN WILLIAMS: Baroness, are you a supporter of

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1 2 3 4	A. A	rm's-length bodies? s I think I said in my statement, I think they do have alue. If you think about Government owning things like anks, the Post Office, it's not really possible for	1 2 3 4		have things like, for example, the social value of keeping post offices open in their head. So I'm just wondering how easy or not, as the may be, it is to find this person who is able to perform			
5	m	ninisters to be responsible on a day-to-day basis.	5		these, as I would see it, extremely difficult tasks?			
6	T	herefore, the arm's-length system was set up. However,	6	A.	I think it is difficult but I think if you have clear			
7	as	s I said, I think, in my statement, it's extremely	7		objectives that all understand and those are kind of	f		
8	in	nportant it's almost even more important that you	8		trained in at the beginning through induction, and r	ny		
9	h	ave really good people engaged, and I think people need	9		experience, which is quite limited of private equity,	is		
10			10		that the people they put on boards to represent the	m,		
11	aı	n ALB representing the Government, you have a very	11		you know, have sort of central if you like, central			
12		nportant duty and, actually, it's quite similar,	12		training, they're selected to be able both to sit on			
13	рі	rivate equity, where they own a big stake in a company,	13		boards and to take an independent view, and it may be			
14		hich I've had experience of, they put a director on the	14		that the cadre of people that we have in ShEx, whi	ch is		
15		oard, and that director, I can tell you, is always	15		now UKGI, you know, have to have that kind of su			
16		sking questions and thinking about, as it were, the	16		I have to say, you know, I'm obviously not up t			
17		wners' needs, both financial and non-financial. So	17		date on what they do do, but it is a very interesting			
18		oes that answer my question, Sir Wyn?	18		important area because you've got to get the mixtu			
19		YN WILLIAMS: Well, it does. I'm just wondering how	19		these operations moving forward commercially, bu			
20		asy it is, actually, to find this super-charged person	20		reflecting the public sector value, sometimes the se			
21		ho is able to always distinguish between his or her	21		value, sometimes obviously value for money, whic			
22		uties as a member of the Board, ie his or her duties to	22		matters as well, and which the external people can			
23		ne company, and, at the same time, represent	23		really help with. It's difficult. I don't envy them			
24			24		their task, Sir Wyn.			
		shareholder who is not necessarily aligned with all	25	CID	• •	\A/all		
25	u	ne objects of the company because the shareholder will 161	25	Sir	NYN WILLIAMS: All right. Thank you very much. 162	vveii,		
1	l'r	m very grateful to you for making a very detailed			INDEX			
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