

18 April 2024

Witness Name: Martin Anthony Edwards

Statement No.: WITN09760100

Dated: 18 April 2024

POST OFFICE HORIZON IT INQUIRY

FIRST WITNESS STATEMENT OF MARTIN ANTHONY EDWARDS

I, Martin Anthony Edwards, will say as follows:

INTRODUCTION

1. This witness statement is made to assist the Post Office Horizon IT Inquiry (the “**Inquiry**”) with the matters set out in the request for information pursuant to Rule 9 of the Inquiry Rules 2006, dated 12 March 2024 (the “**Request**”). My retained lawyers, Kingsley Napley LLP, have assisted me in preparing this statement, but the content is instructed by me.
2. The principal headings within the Request are referenced in capitals, with sub-headings being added to this statement to assist with answering the Request’s questions in a structured manner.

BACKGROUND

Career history

3. I have been asked to provide a summary of my career and qualifications prior to joining Post Office Limited ("**POL**"). I obtained an English Literature (MA) degree from the University of Edinburgh in 2001. Following graduation, I spent 11 years in the UK Civil Service, working at HM Treasury, UK Financial Investments, the Home Office and the Scottish Government. I worked on a broad range of policy development roles during this period, including tax and welfare reform, public spending control, the Government's response to the 2007-08 financial crisis and international police co-operation.

4. I left the Civil Service and moved to POL in September 2012, initially in the role of Chief of Staff. This was a newly-formed role which was created to assist the then Chief Executive Officer ("**CEO**") of POL, Paula Vennells ("**PV**"). At that time, POL had recently separated from Royal Mail Plc and was establishing itself as a stand-alone entity and undergoing a major transformation programme to move towards financial sustainability. The purpose of the role was broadly defined, providing support and co-ordination across a wide range of strategy projects and day-to-day issues. I was not the subject matter expert ("**SME**") on any particular issue and did not have any specific decision-making accountabilities. A major part of the role involved co-ordinating and editing numerous briefings, reports and correspondence either going to PV (for example to prepare her for meetings) or being issued from her, such as letters to external stakeholders or updates to the POL Board. The substance and technical detail for these documents would typically come from the relevant SMEs for the topic in question, and my role was to edit this information to ensure

the end product was suitably clear and succinct for the target audience.

5. The Chief of Staff role was positioned as a time-limited development role, as a precursor to other positions within the organisation.
6. In October 2014 I moved to become the Group Strategy Director at POL. This involved co-ordinating the business' Three-Year Strategic Plan, managing funding negotiations with the Government and managing a team which provided an internal consultancy function for POL across a broad range of strategy projects. As explained later in this statement, this and my subsequent roles at POL had very limited involvement with the matters being examined by the Inquiry.
7. In January 2018 I moved to become Managing Director, Identity and Government Services at POL. Within that role I had commercial responsibility for POL's portfolio of Government and identity services, including bringing new products to market and renegotiating client contracts.
8. Since October 2020 I have worked for POL as Network Strategy and Delivery Director. In this role I am responsible for setting the strategic direction for POL's branch network and developing our commercial relationship with postmasters and franchise partners.

THE HORIZON IT SYSTEM ("HORIZON")

Knowledge of Horizon IT issues

9. I have been asked to consider a Computer Weekly article dated 11 May 2009 [POL00041564]. This article was published more than three years before I joined POL. I do not recall reading this specific article before it was provided to me along with the Request. In my initial months at POL I became generally aware that Computer Weekly was investigating concerns around this article, but I was not involved in specific internal discussions around Horizon.

10. I have been asked to consider the Rod Ismay Report dated 2 August 2010 [POL00026572]. I was not involved in the production of this report, which was issued two years before I joined POL. I do not recall reading the report when I joined.

Training on Horizon

11. I had training on Horizon at some point in 2013, during my first 12 months of working for POL. This comprised a one-day standard training course held at one of POL's Counter Training Offices, providing a basic introduction on how to use Horizon as a customer-facing operative. This training was provided to Head Office staff so that we had an understanding of how Horizon worked and its user interface, but also to equip us to provide support to branches in contingency situations such as industrial action. Beyond this basic training, I did not have any knowledge of the technical workings of Horizon. I deferred to colleagues in the IT

team on any questions relating to IT issues or wider Horizon concerns, as such matters fell outside of my expertise.

Knowledge of Horizon issues

12. I understand Horizon was first used in POL in 1999, over two decades before I joined the business. As noted above, my knowledge of its technical workings was very limited.
13. I believe I first became aware of concerns raised about bugs, errors or defects (“**BEDs**”) with Horizon due to the campaigning work of Alan Bates and the Justice for Subpostmaster Alliance (“**JFSA**”). On 4 October 2012 (a couple of weeks after I joined POL) I attended a meeting with PV, James Arbuthnot and Alan Bates of JFSA in relation to the Second Sight investigation. I attended the meeting in a note-taking capacity only. During the meeting, alleged Horizon errors were raised by Alan Bates.
14. My awareness of JFSA’s concerns about BEDs and a lack of integrity in Horizon developed through time, particularly during the course of the Second Sight investigation, my involvement in which is discussed at paragraphs 33 to 44 below.

Remote alteration of Horizon data/ ARQ data

15. I believe at some point during the course of the initial Second Sight investigation a suggestion was raised by ex-SPMs that Fujitsu employees

could alter branch data in the Horizon system remotely. I note from an email from Alwen Lyons to me on 4 June 2013 [POL00029590] that the “Rudkin case” was being included in the cohort of cases which was being considered by Second Sight. This was discussed in Spot Review SP05 in the Second Sight Interim Report dated 8 July 2013 [POL00099063]. My knowledge at that stage of the background to the Rudkin case was limited to what was ultimately included in the Second Sight report.

16. I did not have any detailed understanding of the data associated with Horizon during my tenure as Chief of Staff, nor did I have any understanding of specifically what ARQ data constituted.

OPERATION OF POL AND HORIZON

POL's dealings with SPMs regarding shortfalls

17. I was not directly involved in dealings with SPMs regarding shortfalls in branch accounts. This was not part of my role.
18. In relation to how often SPMs would raise concerns about Horizon, and whether this changed over time, I was primarily aware of disputed shortfalls in branch accounts through the initial cohort of cases which were part of the Second Sight investigation and the other cases which subsequently came to light through that investigation.
19. In respect of how any reported problems with Horizon could be escalated

within POL and/or to Fujitsu, my understanding is that SPMs would normally raise issues with the Branch Support Centre or their Area Manager in the first instance, and might sometimes contact more senior managers if they were unsatisfied with the response. However, given the nature of my role I was not close to the details of the specific policy for escalating branch issues within POL.

20. Additionally, during my tenure I am aware that POL encouraged SPMs to come forward with concerns for the purposes of the Second Sight investigation and mediation scheme.

21. I have been asked whether I considered the advice and assistance available to SPMs to have been adequate. I did not have any first-hand knowledge of this, as interactions with SPMs was not part of my role. However, as a result of being briefed on and reading the Interim Second Sight report in July 2013, I formed the view that the training and support provided by POL to SPMs on the use of Horizon had historically been poor and this could have been one of the root causes of reported problems using the system. It was apparent that Horizon was not especially user-friendly, particularly in light of the diverse levels of prior IT experience of those running Post Office branches. It appeared to be the case that the POL training was not comprehensive and detailed enough for the users to be able to consistently use Horizon without errors arising.

POL's prosecutorial function

22. I have been asked to set out my knowledge of POL's prosecutorial function, in particular, its use of Horizon data to pursue prosecutions against SPMs for fraud, theft and/or false accounting. In so doing, I have been referred to an email from Lesley Sewell to me on 28 June 2013 **[POL00098778]** and the witness statement attached to this email **[POL00130356]**.
23. I was not directly involved in POL's prosecutorial function. Any knowledge I gained was through briefings on the Second Sight investigation and being briefed on later reports in relation to POL prosecutions. The reports I refer to included the Cartwright King review and the Brian Altman KC report, in which I understand it was concluded that POL's prosecution process had been "fundamentally sound". I do not specifically recall reading the email referenced in paragraph 22 above or its attachment when it was sent and, upon reading it now, it appears to corroborate the view held at the time that whilst there were some horizon bugs, they were not systemic or used as the principal evidence for previous prosecutions.

POL's handling of complaints by SPMs

24. I did not have any detailed involvement in POL's handling of complaints made by or litigation involving SPMs in which the integrity of Horizon was raised. My high-level involvement was to brief PV on reports by SMEs or to prepare her for meetings with, for example, James Arbuthnot and

members of JFSA on a small number of occasions, as explained in the following section. I was not involved in any of the procedural detail of the handling of complaints by POL.

ENGAGEMENT WITH MPs IN 2012

25. In respect of my involvement with preparing POL's response to MPs or journalists who raised concerns about the Horizon IT system *prior* to 2012, I can confirm that I had no such involvement. I was not employed by POL at that time.

26. I did, however, have a minor involvement in the preparation of POL's response to MPs who raised concerns about the integrity of Horizon towards the end of 2012, examples of which are explained below.

27. The first involvement I had in the briefing of MPs on behalf of PV was on 24 September 2012, which was approximately one week after I commenced my role as Chief of Staff. This is demonstrated by an email from me to Theresa Iles, Alwen Lyons and Simon Baker on 24 September 2012 [**POL00115748**]. This email circulated a copy of a response to James Arbuthnot, originally drafted by Simon Baker, which was to be signed by PV. Simon Baker's letter was sent to me in draft by Theresa Iles, who was PV's Executive Assistant. My role was to review the letter and to ensure it was clear and succinct before sending it as a final draft for PV's approval. I was not, at this stage, versed in the detail of the JFSA issues and James Arbuthnot's involvement.

28. As shown in an email from Theresa Isles to Janet Walker dated 28 September 2012 **[POL00107793]**, I attended a meeting with James Arbuthnot, PV and Alan Bates on 4 October 2012 (which is discussed at paragraph 13 above). This was around two weeks after I had started in post as Chief of Staff. I was there in an observation/ note-taking capacity rather than to contribute my views to the discussion.
29. I followed up with a summary (described as a “read out”) of the meeting by email on 4 October 2012 at 11.45pm to Simon Baker, Alwen Lyons and Susan Crichton **[POL00097030]**. POL's perspective at the time was that the Horizon IT system was operationally sound, but, notwithstanding this, the business wished to work with Alan Bates and the JFSA to assuage their concerns. A number of action points were agreed at the meeting as recorded in my email. In particular, Mr Bates was to be invited to POL Head Office to provide wider feedback to the network support teams. I note that I later contacted Alan Bates to provide him with an update on progress following our meeting (email chain between Theresa Isles, PV and me on 18 October 2012 **[POL00097058]**).

Briefings on the integrity of Horizon (including remote access)

30. I have been asked to describe my involvement in briefing PV, Alice Perkins and other senior managers or Board members on the integrity of

the Horizon IT System (including remote access), and how I determined what information to give to them.

31. There were two principal categories of briefs I would help to co-ordinate: (1) background briefings to prepare PV (or occasionally Alice Perkins) for meetings with external stakeholders; and (2) internal briefing papers, for example CEO reports for the Board. Typically, the content and detail of a briefing would come from the relevant SME in POL. My role as part of PV's office was to: a) ensure the briefing was provided on time to inform the engagement; b) edit the document to ensure that it covered an appropriate amount of detail, taking into account the target audience's time constraints; and c) make sure that it was clear and succinct. When the topic was not entirely familiar to me, I would prepare the draft briefing paper then send it to the SME to check that the important messages had been captured correctly and comprehensively in my summary.

32. I recall one occasion when I collated a briefing paper for the full Board, which was an update on the work programme following the publication of Second Sight's first report dated 26 July 2013 [POL00298004]. This was a consolidation of inputs from various SMEs across the business. My role was to ensure that the salient matters were addressed in a comprehensive, yet succinct, manner.

INSTRUCTION OF SECOND SIGHT

Appointment of Second Sight and relationship with Second Sight post-appointment

33. I was not personally involved in POL's decision-making process in respect of the appointment of Second Sight. My understanding is that Second Sight was instructed in the period of June to July 2012, which was around two to three months before the commencement of my role as Chief of Staff in September 2012.
34. Following the commencement of my Chief of Staff role, I was aware that Susan Crichton, as POL General Counsel, was the senior executive member with lead responsibility for the appointment and management of Second Sight. To my understanding, such responsibility would have included determining the ambit of Second Sight's investigation, as well as the methodology of any such investigation (including, for example, the sample of cases which were to be reviewed, as well as the information and documentation to be accessed).
35. I have been referred to an email dated 6 June 2012 from Susan Crichton to Alice Perkins and PV, copying in Lesley Sewell, Alwen Lyons, Simon Baker and Angela Van-Den-Bogerd **[POL00113791]**. Attached to this email were two documents, namely the Terms of Reference for the Horizon investigation, as well as Second Sight's own proposal in respect of the investigation. The Terms of Reference document is dated 6 June 2012 and is authored by Susan Crichton. It set outs the background to POL's proposal for an independent review of past cases, the objectives

and scope of such a review, information regarding Second Sight suitability and qualifications, as well as the estimated timescales and costs. The ambit and methodology of Second Sight's proposed investigation is covered in the "Objectives and Scope" section of the same, namely:

"Objectives & Scope

The Post Office has instructed an independent third party organisation, 2nd Sight Limited [to] provide a proposal to conduct a review which would include the following tasks:

Select a representative sample of cases that have led to prosecutions/court-appointed restitution. The sample needs to cover cases:

- where defendants claim they didn't take any cash*
- where assertions have been made that 'The System' (i.e. Horizon) caused the shortage (include the old and new versions of Horizon if possible)*
- which have been taken up by MPs*

Carefully review all company-held documentation focussing heavily on probable reasons why shortfalls occurred or built up

Interview company investigators to gain insights and verify fairness of findings

*Review defence submissions focussing on evidence of innocence
(consider separately False Accounting and Theft)*

*Try to establish why the shortages arose (assign each case to a
Probability Category such as: Skill shortfall; Diversion to Failing
Business; Straightforward Theft (by whom?); Mysterious
Disappearance; etc.)*

*Review all materials from the viewpoint of the Defence (seek Proof of
Innocence and test evidence indicative of guilt)*

*Study and selectively test, the 'Horizon' system in order to find any
'Black Hole', Program Bug; etc. that might have caused mysterious
shortages*

*Reach conclusions on each case and identify any system
issues/concerns"*

36. I am asked to describe how senior managers within POL viewed Second Sight and the purpose of its investigation. As I was not personally involved in the Second Sight appointment process, I did not have direct knowledge of senior managers' views upon the instruction of Second Sight. My understanding is, however, that POL senior managers' views of Second Sight at the time of appointment would have been consistent with the "Objectives and Scope" section in the Terms of Reference referenced

at paragraph 35 above. In addition, I believe that the purpose of the appointment would have been born out of a desire by senior managers to clarify and further investigate the matters set out in the “Background” section of the same document, as set out below:

“Background

Post Office Limited has decided to conduct an independent review of a number of closed, and possibly some open fraud and theft cases. The background is that the Post Office has, in accordance with its statutorily-authorized powers, pursued cases involving fraud, theft and false accounting principally in the criminal courts. This has resulted in a large number of prosecutions and restitution of stolen funds. In recent years, a number of defendants have asserted that there are issues with the Post Office’s National Computer System, ‘Horizon’. The defendants claim that the system has been throwing up mysterious differences (shortages) for which they have taken have taken the blame. Some of these cases have been taken up by Members of Parliament and this has resulted in heightened publicity attaching to individual cases and to the issue as a whole. This involvement and publicity has also lent support to assertions that Horizon really is the root cause of the problem and that some of those convicted only made false accounting entries because there seemed at the time to be no other viable course of action. They claim, in effect, that they have been unfairly convicted and financially ruined.”

37. It became clear to me that the views of POL senior management on the capacity of Second Sight to handle the investigation in a timely and objective fashion evolved over time. In particular, by mid-2013 there were growing concerns by senior managers regarding the progress of the Second Sight investigation. These included the following matters:

- a) There was a desire to bring the Second Sight investigation to a timely conclusion, preferably before the Parliamentary summer recess. By that stage in mid-2013, the number of cases to be reviewed had significantly increased. This materially contributed to Second Sight being unable to deliver its conclusions by the end of 2012 as originally envisaged. Such delays led to questions regarding when Second Sight's investigation would, in fact, be ultimately concluded, and whether there was potential for even further slippage of timescales.

- b) Relatedly, there were concerns regarding budget overruns and the amount of public money being expended on an investigative process which had no foreseeable conclusion. As noted above, while POL senior managers were fully supportive of the Second Sight investigation, they were also anxious to ensure that public funds were expended responsibly. I understood that POL itself did not enforce any explicit budgetary or time constraints on the Second Sight investigation, as it wished to ensure that the integrity and independence of the investigation was maintained throughout.

However, this approach meant that the investigation risked continued delays, costs overruns, and potential deviation from its original scope.

- c) By this stage, there were queries regarding whether Second Sight itself had both sufficient capacity and objectivity to produce a comprehensive and objective report beneficial to all stakeholders. In terms of capacity, Second Sight was a firm comprising essentially two directors. Queries were therefore raised regarding whether the firm was, in fact, adequately resourced to undertake an investigation that was now significantly more expansive than originally envisaged. In terms of objectivity, POL senior managers had some concerns regarding the extent to which Second Sight had adopted subjective (and sometimes emotional) views of the evidence presented to them, instead of taking a more neutral and evidence-based stance ordinarily consistent with an independent investigation.

38. Such concerns continued to be voiced throughout 2013.

39. I have been asked to explain the management of POL's response to Second Sight information requests and investigations into Horizon. It was clear from a letter from Alice Perkins to James Arbuthnot which was drafted on 21 March 2013 [**POL00097781**] that POL wished to cooperate fully with the Second Sight investigation and Second Sight's requests for evidence. As noted above, in my role as Chief of Staff, I did not have first-hand awareness or knowledge of how POL responded to specific Second Sight information requests. I was aware, however, that there were some

practical challenges experienced in retrieving certain information which had been sought (for example some information was stored on archived IT systems or paper-based repositories).

40. I have also been asked to explain the contents of my email to PV on 27 June 2013 at 20:55 [POL00098777] regarding POL's relationship with Second Sight, in particular:

a) why I stated that "*we need to be careful not to overplay our hand with SS [Second Sight] – they could turn out to be quite dangerous if we threaten them with legal action or attempt to replace them with another firm*"; and

b) why I stated that POL should explain "*to JA [James Arbuthnot] calmly but firmly why he cannot allow SS to disseminate a misleading interim report.*"

41. By way of background, my email was a response to a previous email on the same day from PV at 20:02, inquiring whether I had any "*further thoughts*" following an earlier meeting that day to discuss the Second Sight investigation and a forthcoming update to MPs. It is also set against the growing concerns in relation to the progress of the Second Sight report, as set out at paragraphs 37 to 38 above.

42. Accordingly, in the email referenced above, when asked by PV whether I

had any further thoughts following the meeting with James Arbuthnot, I replied with my personal opinion regarding the various courses of action presented. While I did not have a decision-making role, I set out what I considered to be the repercussions of those various courses of action.

43. As the email indicates, there were suggestions being made by some colleagues to replace Second Sight with another investigation firm which might have possessed the requisite capacity. My personal view, insofar as I recall, was that doing so might be portrayed as POL seeking to suppress Second Sight's report as POL did not like its findings, which would have been inappropriate and incorrect. I noted that it would be "*quite dangerous*" if Second Sight was replaced or dismissed, in that they would likely (and understandably) feel aggrieved and possibly escalate matters further by briefing the media and/or MPs directly. I believed that a more moderate and balanced approach would be to maintain a good working relationship with Second Sight to ultimately ensure that their findings were sufficiently objective and robust. I considered that this would be in the best interests of both POL and all other stakeholders concerned.
44. Given, in my view, that replacing Second Sight was not the preferred course of action, the alternative approach was to adopt the "*softer option*" of explaining "*to JA [James Arbuthnot] calmly but firmly why he cannot allow SS to disseminate a misleading interim report*". Practically speaking, this alternative approach meant either "*delay[ing] or reposition[ing]*" the interim report as a "*very neutral status update*". Against the backdrop of

concerns regarding Second Sight's capacity and objectivity, I considered that it would be inadvisable for a report to be published which, as we perceived it at the time, only represented a partial (and not entirely objective) picture. Such a course of action could be construed as "*misleading*". Accordingly, I suggested that it may need to be explained to James Arbuthnot that the manner in which the interim report was presented should be amended in order to manage expectations and ensure that its contents were accurately portrayed.

POL's response to MPs and journalists on the integrity of Horizon in 2013 and 2014

45. I am asked about the extent to which, from 2012, I was involved with POL's response to MPs and journalists who raised concerns as to the integrity of the Horizon IT System. My role did not involve briefing or dealing with journalists directly; this was handled by POL's separate Communications Team.
46. In relation to my involvement in responding to queries raised by MPs, my role was principally to prepare briefing notes or written communications on behalf of PV (or, on occasion, Alice Perkins) in respect of their meetings with James Arbuthnot, or to provide an opinion on the tone or content of the communications with him. Examples of my involvement in preparing briefing notes for meetings with James Arbuthnot in 2013 can be seen in an email from me to Alice Perkins on 21 March 2013, copying PV and others **[POL00097781]**; and in a further email from me on 3 July 2013 to PV and

Alice Perkins, copying others regarding a James Arbuthnot briefing **[POL00098898]**. Examples of my involvement in preparing communications with James Arbuthnot and Jenny Wilmott MP in 2014 can be seen in an email chain between me, PV, Belinda Crowe, Chris Aujard, David Oliver and Mark Davies on 12 and 13 May 2014 **[POL00116554, POL00116557 and POL00116562]**. I also sent an email on PV's behalf to James Arbuthnot on 10 May 2014 **[POL00101018]**.

THE HELEN ROSE REPORT

47. I have been asked to set out the nature and extent of my understanding of the creation of the Helen Rose report and POL's response to the same. In doing so, I am asked to consider document **[FUJ00086811]** ("the **Helen Rose report**"). I was not involved in the creation of the Helen Rose report and I do not recall being involved in POL's response to it when I was in post.

48. I did not personally share the Helen Rose report with, or provide a brief on the Helen Rose report to more senior managers, board members, SPMs or MPs. It would not be within my role to unilaterally share any information with SPMs or MPs. I believe I first became aware of the Helen Rose report when it was mentioned in an email from Rodric Williams to me on 23 October 2013 **[POL00108163]**, in which he provided his contribution to the CEO Report for the Board. I took the view at that time that it was not sufficiently material to include reference to the Helen Rose report in the CEO report for the Board

which I was compiling on that date, as set out in the email chain with Rodric Williams. I did, however, arrange for a brief on the report (and other matters) to be prepared for PV prior to the November 2013 Board (email from me to Belinda Crowe, Chris Aujard, Rodric Williams and Sarah Paddison on 28 October 2013) [POL00196705]. I did not engage in this brief myself due to my being on leave.

49. I am asked to what extent, if at all, did the matters concerning ARQ raised in the Helen Rose report make me or anyone else at POL concerned that past convictions may have been unsafe. I cannot speak for the view taken by the legal team or any others who reviewed the Helen Rose report. From my perspective, I did not review the report in detail and was reassured by email communications in which I was informed Brian Altman KC was of the view that it “added very little” and it was unlikely to become an important document in the future.

THE INTERIM REPORT AND THE MEDIATION SCHEME

Involvement in response to Second Sight reports and the Mediation Scheme

50. My involvement with POL’s preparation for, and response to the Second Sight Interim report was consistent with the responsibilities of my Chief of Staff role. As noted above, my role was primarily one of a conduit: to collate information from the relevant business leads and SMEs, then to synthesise such information into an accessible format for PV, the Board or other audiences. For example, in terms of POL’s preparation for the

Second Sight report, I produced the internal briefing note for the James Arbuthnot meeting on 3 July 2013 ahead of the publication of Second Sight's Interim Report. This was attached to my email to Alice Perkins and PV of the same date [POL00098898]. The information contained in the briefing note was provided by various business leads, including Susan Crichton, Alwen Lyons and Mark Davies.

51. In relation to the Initial Complaint Review and Mediation Scheme ("**the Mediation Scheme**") and the Working Group established to monitor the Mediation Scheme ("**the Working Group**"), I did not have any substantive role or responsibilities in either entity. I do not recall passing any information to the Mediation Scheme or the Working Group.

Project Sparrow

52. Project Sparrow was the internal name given to POL's follow-up of the Second Sight Interim Report, its engagement with JFSA, the operation of the Mediation Scheme, and matters connected to the same. A subcommittee of the Board, chaired by Alice Perkins, and including PV and at least one non-executive director, was established to provide oversight of this programme of work. As described in the email chain between Alice Perkins, PV, and Chris Aujard dated 10 March 2014 [POL00116321], it was considered that a smaller group of individuals would help provide dedicated and more efficient governance for this work.

POL's treatment of complaints regarding Horizon

53. I have been asked to describe policies and strategies adopted by POL in responding to complaints made about Horizon as part of the Mediation Scheme (and more widely). As noted above, I had limited involvement in the operation of the Mediation Scheme, and was not involved in the process to determine which complaints/cases might be accepted as part of the Mediation Scheme.
54. In terms of POL's wider policies and strategies to respond to complaints made about Horizon, I was aware of the following primary workstreams during my tenure as Chief of Staff, as set out in the Board report dated 26 July 2013 [**POL00298004**]:
- a) Completion of the review of the remaining 47 cases which had been referred to Second Sight for investigation by JFSA and MPs, with the aim of seeking some form of resolution in each case. This formed the basis of the Mediation Scheme.
 - b) POL had instructed Cartwright King to undertake a review of its past and present prosecutions to identify any cases where the Second Sight report ought to be disclosed. It had also been consulting with Brian Altman KC to provide additional advice and independent oversight over this process. Further details of these reviews are set out at paragraph 75 below.

c) Significant improvements to training and support for SPMs was proposed, to be led by Angela van den Bogerd, and supported by a programme board. This workstream related to the Branch Support Programme and the Branch User Forum, further discussed at paragraphs 61 to 65 below.

d) It was also anticipated that similar, historical complaints about Horizon may be made following media and Parliamentary attention arising from the Second Sight interim report. My understanding is that the Mediation Scheme was intended to be extended to such new cases, with a filtering (or application process) to be implemented for those new, additional complaints prior to their acceptance in the Mediation Scheme.

55. I have also been asked to describe my involvement in liaising with MPs and government in respect of complaints made about Horizon in the Mediation Scheme (and more widely). I did not have a role in briefing MPs directly; such a responsibility would have been led by the POL Communications team. As noted above, my role was limited to ensuring that PV was well-prepared for any meetings with MPs. In terms of communications with the government, I had an informal role in keeping the Shareholder Executive (“**ShEx**”) team updated with matters across POL. For instance, this included providing updates to POL’s ShEx team regarding progress of the Working Group (see, for example, the email correspondence from myself to Will Gibson (ShEx) attaching a last draft

of the Horizon statement dated 8 July 2013) **[UKGI00001730]**). It also included liaising with the ShEx team regarding the progression of the Mediation Scheme (see, for example, the update provided in the email to Will Gibson and Peter Batten (ShEx) dated 24 October 2013) **[UKGI00002119]**. This complemented the more formal engagement mechanisms between ShEx and POL, for example, PV's monthly meetings with the relevant ShEx director, and ShEx's representation on the Board.

Branch Support Programme

56. I have been asked to explain the purpose of the Branch Support Programme (“**the Programme**”), how it was implemented, and my involvement in it. The Programme was primarily established, as a result of the findings in the Second Sight Interim Report, to improve the effectiveness of POL's processes regarding the training and support offered to subpostmasters across the network.
57. I have been referred to the Terms of Reference of the Programme (dated 19 July 2013) **[POL00089711]**. The purpose of the Programme, as set out in its Terms of Reference, was as follows:

The purpose of this Programme is to understand the current business processes, operational procedures and ways of working which are in place to support branches, identify the gaps and produce

recommendations to rectify the issues.

58. The Terms of Reference also set out how the Programme was to be implemented. The approach was to follow “*normal project management principles*”, with a governance structure established, key stakeholders identified, and a project plan with key milestones and deliverables developed. In terms of governance, the Programme was requested to be established by Alice Perkins and PV. Angela Van-Den-Bogerd was to lead the Programme, with Gayle Peacock and Amanda Stevens accountable for running the Programme at an operational level.
59. In terms of key stakeholders, the Terms of Reference set out each business area, together with the respective individuals responsible at both the Programme Board level and the Working Group level. The key deliverables of the Programme, as well as the key performance indicators and how the Programme’s success would be measured, were also set out. This included, for example, agent and colleague engagement/satisfaction, the quality of training and support provided, the value of branch losses and debt, costs, the structure, as well as the robustness of the system.
60. I have been asked to describe my involvement in the Programme. I did not have any substantive involvement in the establishment of the Programme, nor did I have direct responsibilities at any level in relation to the Programme itself. However, I may have received ad hoc updates on

the Programme, and other Project Sparrow workstreams, through the course of collating updates for PV or the Board.

Branch User Forum

61. I have been asked to explain the purpose of the Branch User Forum (“**the Forum**”), how it was implemented, and my involvement in it. The Forum was established as a mechanism through which subpostmasters, JFSA, and other key stakeholders could raise any concerns regarding POL processes, training and support.
62. I have been referred to the draft Terms of Reference for the Forum (dated 19 August 2013) [POL00027664]. My understanding of the purpose of the Forum is consistent with that described in its Terms of Reference, as follows:

The purpose of the Branch User Forum is to provide a way for sub-postmasters and others to raise issues and insights around business processes, training and support directly feeding into the organisation’s thinking at the highest level. The forum is a forward looking mechanism to ensure the business processes and approaches are fit for purpose for users and are in keeping with Post Office behaviours and values.

63. The Forum's Terms of Reference also set out its specific objectives, namely:

- To assess issues raised from with[in] the Post Office network; identify appropriate solutions and recommend improvements to rectify the root cause and prevent recurrence of the issue.
- To assess issues raised from Post Office support/central functions; identify appropriate solutions and recommend improvements to rectify the root cause and prevent recurrence of the issue.
- To input into the design of the end to end process for new products and services before launch to the Post Office Network.
- To assess improvement suggestions from the Post Office network and support/central function i.e. "would this work?"

64. Membership of the Forum consisted of either those responsible for the design and delivery of POL policies, processes, training and support, or were the end users of the same. The Forum comprised a core POL senior manager population, who was entitled to refer to a subgroup of POL experts to assess the operational implications of issues and improvement opportunities. The Chair of the Forum was Angela Van Den Bogerd, and membership consisted of representatives from the POL IT & Change team, POL Network team, POL Commercial team, representatives of

subpostmasters, and representatives of the Crown (Directly Managed) Branches.

65. I have been asked to describe my involvement in the Forum. I did not have any substantive involvement in the establishment of the Forum, nor did I have responsibilities at any level in relation to the Forum itself.

Involvement with Mediation Scheme and Working Group

66. I have been asked to describe my involvement in briefing POL senior managers in respect of the Mediation Scheme. The briefings to PV and Alice Perkins (as well as other senior managers) generally originated from the dedicated project team established to implement and run the Mediation Scheme from around October 2013. Accordingly, once the dedicated project team had been onboarded, I did not have a major role in preparing briefings or directly passing on information in respect of the Mediation Scheme and Working Group to POL senior managers. My main ongoing involvement was limited to incorporating updates on the Mediation Scheme, Working Group and other 'Project Sparrow' workstreams into the CEO's Report to the Board.

67. Prior to the establishment and onboarding of the full dedicated project team however, there may have been occasions, albeit limited, when I prepared briefings for PV and the Board. I would do so in a manner consistent with the briefings I prepared on other matters, namely by

collating relevant information from the respective business leads and synthesising the information into a readable format. Examples of such occasions included the following:

- a) An update to the Board, which I prepared on 26 July 2013 regarding the key workstreams arising in response to the Second Sight report, and which also included an update on the establishment of the Mediation Scheme **[POL00298004]**. The update provided further details in relation to the likely profile of the proposed mediator, the possible outcomes of the mediation process, discussions with James Arbuthnot, Second Sight and JFSA regarding the process, as well as alternatives to mediation.

- b) A briefing to PV, which I prepared in advance of her meeting with Sir Anthony Hooper on 24 September 2013. The briefing was to prepare PV for her initial meeting with Sir Anthony Hooper to discuss his potential role as Chair of the Working Group (which was tasked with running the Mediation Scheme). The briefing was attached to my email of the same date, and sent to PV, copying in Susan Crichton, Alwen Lyons, and Theresa Iles **[POL00116131]**.

68. In terms of the Mediation Scheme and Working Group more generally, I did not have any substantive involvement in the determination of the scope of either entity. While I may have been involved in preliminary discussions regarding the establishment of the Working Group itself (see for example

my email to Mark Davies dated 6 July 2013, copying in Alwen Lyons, PV, Lesley Sewell, Susan Crichton and Theresa Iles **[POL00099050]**, I do not recall being involved in producing the Working Group's Terms of Reference.

69. I have been asked to describe the extent to which I was involved in any decision-making relating to the ambit of Second Sight's investigation or its access to relevant information and documents. As noted at paragraph 42 above, I did not have any substantive decision-making role in respect of Second Sight's investigation. Such a role would have been undertaken by the dedicated project team established to implement and run the Mediation Scheme, reporting to the General Counsel and PV. Notwithstanding this, on several occasions, in the course of preparing briefing notes for PV, I had limited input to dialogue regarding Second Sight's involvement (see for example my email to Belinda Crowe, Chris Aujard and David Oliver dated 5 February 2014 and the corresponding attachment regarding the pros and cons of the three options in respect of Second Sight's continued involvement **[POL00116250]** and **[POL00116251]**, and my email to PV and Theresa Iles dated 13 February 2014 regarding the meeting with Sir Anthony Hooper, including how to engage with Second Sight going forward **[POL00108257]**). As discussed in paragraphs 40 to 44 above, at an earlier stage in the process, prior to publication of the Interim Report and establishment of a dedicated project team, I did set out my concerns should the ambit of Second Sight's investigation be changed ahead of the publication of the Interim Report

[POL00098777].

70. As I was not required to personally attend the meetings of the Working Group, I did not have a first-hand view into the operation of the Working Group. My understanding of what had occurred in Working Group meetings would generally be the result of reviewing summaries of those who had attended such meetings. I therefore cannot recall forming any personal views on how the Working Group operated.

POL's strategy in responding to Second Sight Report

71. I am asked to describe the nature and extent of my involvement in POL's response to Second Sight investigations and/or applications made to the Mediation Scheme. I do not recall being directly involved in POL's response to applications made to the Mediation Scheme. I was, however, involved in POL's response to the Second Sight Interim Report, albeit not in any decision-making capacity. I have discussed the nature and extent of my involvement in POL's response to the Second Sight Interim Report at paragraph 50 above.
72. I am also asked to describe POL's strategy in preparing responses to applications to the Mediation Scheme and/or Second Sight reports. In relation to POL's strategy regarding its response to the Second Sight reports, my substantive involvement related to POL's response to the Second Sight interim report (dated 8 July 2013), and I am therefore responding to this question on that basis only. My understanding of POL's

general strategy in responding to the Second Sight interim report was to emphasise the seriousness with which POL was taking the Second Sight investigation process, ensuring that the relevant lessons would be learned from the findings where appropriate. It was important that the Second Sight report was understood to be rigorous, independent, and grounded in the facts. However, it was also important that confidence in POL was not to be undermined unfairly, given Second Sight's findings in the interim report were that there was no evidence to support any suggestion of systemic failures with Horizon. At the same time, POL acknowledged that there may have been potential deficiencies with historical processes regarding Horizon user experience for SPMs, and therefore improved training and support for SPMs was required. POL also wanted to reaffirm its commitment to completing the review of the remainder of cases yet to be considered by Second Sight, which were put forward by JFSA and MPs. POL's strategy is encapsulated in detail in the briefing note for the James Arbuthnot meeting on 3 July 2013 [POL00098898], as discussed at paragraph 50 above. In relation to POL's strategy in response to Mediation Scheme applications, as I did not have any substantive involvement in such applications, I do not have any personal insight of POL's strategy in respect of the same. I refer to paragraphs 53 to 54 above in relation to my understanding of POL's strategy at the time.

73. Additionally, I have been asked to describe POL's approach to disclosing documentation to Second Sight. I did not have any role in Second Sight's access to relevant information and documents or POL's approach to

disclosure of the same.

POL relationship with Fujitsu

74. I have been asked to describe my views on the nature and extent of Fujitsu's assistance in POL's response to applicants of the Mediation Scheme. I was not involved in dialogue between Fujitsu and POL in relation to Mediation Scheme applicants. At a general level, I do not recall any matters of concern raised by the project team regarding Fujitsu's assistance in the Mediation Scheme.

POL review of past convictions based on Horizon data

75. I have been asked to explain my involvement in POL's review of past convictions obtained in reliance on Horizon data. I was not directly involved in this review. However, I was made aware of the fact of the review when collating information for the completion of CEO and/or Board reports. In the course of drafting the Board report dated 26 July 2013, which provided an update on progress following publication of the Second Sight interim report [POL00298004], I was supplied with information from SMEs regarding (inter alia) the Cartwright King review. This included the fact that Cartwright King was reviewing past and present POL prosecutions to identify any cases where the Second Sight report ought to have been disclosed, and that it was then for the defendant to decide whether to apply to the Court of Appeal for permission to appeal a conviction based on additional information. I was made aware of the fact

that, as of 22 July 2013, Cartwright King had reviewed 124 cases, with the following outcomes:

- The prosecution was discontinued in three cases as not being in the public interest;
- Disclosure to the defence had been provided in six cases;
- In all cases, the recommendation is that POL should oppose any attempted appeal; and
- It was not believed that any of the cases would satisfy the test for compensation from the government for a miscarriage of justice under the Criminal Justice Act.

76. I was also made aware of the fact that POL was consulting Brian Altman KC to provide additional advice and independent oversight on this case review process, as well as any wider criminal law questions that might arise. Counsel's scope of work was also to include recommendations regarding POL's future prosecutions strategy.

Investigation of POL's suspense account

77. I have been asked to comment on my knowledge and involvement with the investigation of POL's suspense account. I do not recall having any knowledge or involvement in this aspect of the investigation.

Criticisms of POL in JFSA letter to Sir Anthony Hooper (dated 10 November 2014)

78. I have been asked for my views in relation to the criticisms made of POL by Alan Bates in his letter to Sir Anthony Hooper dated 10 November 2014 [POL00107151]. This letter was sent to Sir Anthony Hooper after I had left my role as Chief of Staff in October 2014. I do not recall reviewing this letter at the time.

POL's internal communications regarding challenges to Horizon

79. I have been asked about my involvement in POL's internal communications regarding challenges to Horizon, and what POL's policy was in respect of such communications.

80. My personal involvement in POL's internal communications regarding challenges to Horizon did not extend beyond my Chief of Staff responsibilities, which have already been discussed above. The POL Communications team led on internal communications and I had limited involvement in this in my role as Chief of Staff.

81. I was not aware of any formal POL policy in respect of internal communications on this matter. However, if media reports on a certain topic intensified, then it would be normal practice for the Communications team to circulate an update together with the business' views on that topic to POL staff members.

Treatment of applications made to Mediation Scheme

82. I have been asked whether I had concerns that I (or those responding to Mediation Scheme applications) were not receiving accurate and/or complete information regarding BEDs, remote access, or integrity of the Horizon system. As noted above, I did not have any personal involvement in the Mediation Scheme, including POL's responses to Mediation Scheme applications. I am therefore unable to provide an informed view on whether those responding to applications to the Mediation Scheme were receiving accurate/complete information regarding BEDs, remote access, or the integrity of the Horizon system. I do not recall any specific concerns which were flagged to me by the dedicated project team in relation to the same.

83. I have also been asked why I consider POL's investigation of allegations made by SPMs as part of the Mediation Scheme did not identify new BEDs, a lack of integrity in Horizon, or the extent of remote access. I have discussed above, at paragraphs 13 to 16, the extent of my general awareness of those three matters. On the basis that I am not speaking with the benefit of hindsight, I recall being made aware of the general progress of the Mediation Scheme as part of assembling the relevant briefing documentation and updates for senior managers. However, I had limited direct knowledge of the manner in which cases submitted to the Mediation Scheme were assessed and investigated, and accordingly am unable to express a personal view.

84. I have been asked to describe my views on the reasons/motives for subpostmasters making applications to the Mediation Scheme or campaigning in respect of Horizon. I kept an open mind about the varying circumstances and motivations of the many SPMs that were coming forward by this point in time, but in essence my understanding is that overwhelmingly they were motivated by a desire to address what they (rightly) viewed as inappropriate treatment by POL and clear their names of injustices.
85. Relatedly, I have been asked to what extent I believe the Mediation Scheme fulfilled POL's intended purpose in establishing it. My understanding of the intended purpose of the Mediation Scheme, when it was originally established, was to ensure that the existing cases submitted to the Second Sight process would be properly reviewed and resolved. This was to be done by assisting the specific SPM and POL to find common ground in resolving the SPM's complaint, via an independent and neutral mediator. It was also envisaged that additional historical cases might be submitted for mediation as a result of the media and Parliamentary attention arising from the Second Sight Interim Report. Such cases would be assessed for suitability prior to inclusion in the Mediation Scheme.
86. On the basis of my limited direct knowledge of the Mediation Scheme and its processes, I believe that POL entered into mediation discussions with

positive intent. While I understand some cases were successfully resolved in advance of mediation, in light of how events subsequently unfolded and with the benefit of hindsight, it is clear that the Mediation Scheme did not fulfil its intended purpose, given the fact that a large number of SPMs remained of the view that their concerns were not addressed.

Termination of Working Group

87. I have been asked to explain why POL terminated the Working Group. It appears that the Working Group was terminated in early 2015. This occurred after I left my role as Chief of Staff in October 2014. I was not party to any discussions or decisions regarding its termination, or the communication of that termination to any stakeholders.

Deloitte and Project Zebra

88. I have been asked to what extent I was involved or aware of the instruction of Deloitte on Project Zebra. While I was aware of the appointment and copied into emails regarding Deloitte's instruction in early 2014 (see for example the email from Belinda Crowe to me on 12 May 2014, [POL00116554]), I was not involved in the instruction of Deloitte on Project Zebra.

THE DEATH OF MR MARTIN GRIFFITHS

89. I am asked to describe the nature and extent of my involvement in POL's response to the tragic news that Mr Griffiths had taken his own life. I first became aware that Mr Griffiths had been involved in an incident on or around 23 or 24 September 2013. I note that I was copied into an email from Mark Davies to PV on 24 September 2013 in relation to Mr Griffiths. **[POL00116133]**. I believe that I may have been informed of this before the email was sent, perhaps verbally. I was not expected to brief PV on this matter. Given its importance and very sad circumstances, members of POL senior management had briefed PV directly. I was not expected to take any action in relation to this email; I had been copied for information only.
90. I provided an update to Alice Perkins by email on 2 October 2013 at 1.10pm **[POL00116145]**. In particular, I note that Alice had asked whether James Arbuthnot had been spoken with, given that Alan Bates had copied him into an email in respect of Mr Griffiths' accident. My involvement at this stage was to provide an update to Alice Perkins about PV's communication with James Arbuthnot to explain the steps that POL was taking to support Mr Griffiths' family, and more generally. I believe I may have obtained an update on the date of Mr Griffiths' funeral at the request of PV, but I had no substantive involvement beyond being copied into emails and providing isolated pieces of information, when requested.

91. I am asked to set out the nature and extent of my involvement in POL's decision making in offering Gina Griffiths a discretionary payment. Although I may have been copied into some emails on this topic, I was not part of the decision-making process. This sensitive matter was dealt with at a senior level in POL, without any substantive involvement from me.

POL'S RESPONSE TO COMPLAINTS FOLLOWING THE MEDIATION SCHEME

Involvement in POL's response to concerns raised by SPMs, MPs and journalists regarding Horizon

92. I am asked to summarise the extent to which I was involved in POL's response to concerns raised by MPs and journalists regarding Horizon. Given the heading of the section in the Request I assume this relates to the period following the closure of the Working Group to the letter of claim in the group litigation. My involvement in POL's response to concerns raised by SPMs, MPs and journalists regarding Horizon was limited to preparing some briefing notes in for meetings with MP James Arbuthnot when I was in my role of Chief of Staff (between September 2012 and October 2014). I was not involved in POL's response to concerns raised by SPMs MPs and journalists after that date.
93. I am further asked about my role in briefing the POL Board/ senior management on Horizon following the closure of the Working Group. I was not involved in any activities following the closure of the Working Group as I

moved on from my role as Chief of Staff in October 2014 and was no longer involved in the Mediation Scheme or its aftermath in any way.

POL's response to journalists in 2015

94. I am asked to describe the nature and extent of my involvement in POL's response to journalists running, or proposing to run, stories on the Horizon IT system, including Panorama. I am referred to a number of emails relating to communications within POL in respect of the Panorama documentary. Although I may have received the general update emails from the communications team, as they were sent throughout the business, I was not involved in POL's response to journalists at this stage. That was not part of my remit in my new role as Group Strategy Director at POL, which I commenced in October 2014. For this reason, I was not involved in any discussions on, or contact with, Richard Roll following his appearance on Panorama.

THE SWIFT REVIEW

95. I was not involved in any aspect of the Swift Review as it post-dated my time as Chief of Staff. I note that the Swift Review report is dated 8 February 2016 which is significantly after I transitioned to my new role in October 2014.
96. I do not recall being given the Swift Review to read or receiving a brief in relation to its contents.

GROUP LITIGATION AND POL'S RESPONSE

97. I was not involved at all in the group litigation as this process was instigated after I had left my Chief of Staff role in October 2014 and it did not fall to be part of my subsequent roles at POL.

GENERAL

Reflections

98. I have been I have been asked to comment on whether there is anything I would have handled differently, with hindsight, in relation to the Horizon IT System and its associated issues. I have given considerable thought to this question, and reflected, at length, on my responsibilities as Chief of Staff from September 2012 to October 2014.
99. As I have set out in this statement, my role as Chief of Staff primarily comprised supporting PV on a day-to-day basis, and in particular co-ordinating and preparing briefing documentation to or on behalf of PV. I was not the SME on any particular issue, nor did I have any substantive decision-making accountabilities. At the time, I was reassured that POL was establishing what I believed to be a rigorous and appropriate approach to investigate and resolve the emerging concerns of SPMs, namely setting up the Mediation Scheme overseen by an independently-chaired Working Group involving both Second Sight and the JFSA. While the collapse of this process

post-dated my role as Chief of Staff, it is evident, with hindsight, that those arrangements were wholly inadequate to deal with what we know now to be the scale of past injustices. Given the parameters of my role, it is difficult to identify specific examples of what I might have done differently at the time, as my awareness of circumstances now is markedly different to my understanding then. Notwithstanding this, I wish to express my sincere sympathies to the SPMs that have been so profoundly impacted by the matters considered by this Inquiry.

100. Should there be any additional documents relating to the matters being considered by the Inquiry, I would be very willing to review such documents and assist the Inquiry further.

Statement of Truth

I believe the content of this statement to be true.

Signed: **GRO**

Dated: 18 April 2024 | 12:57 PM BST

Index to First Witness Statement of Martin Edwards

<u>No.</u>	<u>URN</u>	<u>Document Description</u>	<u>Control Number</u>
1.	POL00041564	Computer Weekly article dated 11 May 2009	POL-0038046
2.	POL00026572	Rod Ismay Report dated 2 August 2010	POL-0023213
3.	POL00029590	Email from Alwen Lyons to Martin Edwards dated 4 June 2013	POL-0026072
4.	POL00099063	Second Sight Interim Report dated 8 July 2013	POL-0098646
5.	POL00098778	Email from Lesley Sewell to Martin Edwards dated 28 June 2013	POL-0098361
6.	POL00130356	Witness Statement of Gareth Idris Jenkins	POL-0120540
7.	POL00115748	Email from Martin Edwards to Theresa Iles, Alwen Lyons and Simon Baker dated 24 September 2012	POL-0114919
8.	POL00107793	Email from Theresa Iles to Janet Walker dated 28 September 2012	POL-0110840
9.	POL00097030	Email from Martin Edwards to Simon Baker, Alwen Lyons and Susan Crichton dated 4 October 2012	POL-0096613
10.	POL00097058	Email chain between Theresa Isles, Paula Vennells and Martin Edwards dated 18 October 2012	POL-0096641
11.	POL00298004	Briefing paper for the Board 'Update on the work programme arising from the Horizon report' dated 26 July 2013	POL-BSFF-0136054
12.	POL00113791	Email from Susan Crichton to Alice Perkins and Paula Vennells dated 6 June 2012	POL-0112899

13.	POL00097781	Email from Martin Edwards to Alice Perkins, Paula Vennells and others re: Draft letter for James Arbuthnot dated 21 March 2013	POL-0097364
14.	POL00098777	Email from Martin Edwards to Paula Vennells dated 27 June 2013	POL-0098360
15.	POL00098898	Email from Martin Edwards to Paula Vennells and Alice Perkins, copying others regarding James Arbuthnot briefing dated 3 July 2013	POL-0098481
16.	POL00116554	Email from Belinda Crowe to Martin Edwards dated 12 May 2014	POL-0117482
17.	POL00116557	Emails between Martin Edwards, Paula Vennells, Belinda Crowe and others dated 12 May 2014	POL-0117485
18.	POL00116562	Email from Martin Edwards to Belinda Crowe, Mark R Davies, Chris Aujard and others dated 13 May 2014	POL-0117490
19.	POL00101018	Email from Martin Edwards on behalf of Paula Vennells to James Arbuthnot dated 10 July 2014	POL-0100601
20.	FUJ00086811	The Helen Rose Report (last edit date of 12 June 2013)	POINQ009298 2F
21.	POL00108163	Email from Rodric Williams to Martin Edwards dated 23 October 2013	POL-0110958
22.	POL00196705	Email from Martin Edwards to Belinda Crowe, Chris Aujard, Rodric Williams and Sarah Paddison dated 28 October 2013	POL-BSFF- 0034768
23.	POL00116321	Email chain between Alice Perkins, Paula Vennells, and Chris Aujard dated 10 March 2014	POL-0117314
24.	UKGI00001730	Email from Martin Edwards to Will Gibson dated 8 July 2013	UKGI012544- 001
25.	UKGI00002119	Email from Martin Edwards to Will Gibson and Peter Batten dated 24 October 2013	UKGI012933- 001

26.	POL00089711	Branch Support Programme – Terms of Reference v.2 dated 19 July 2013	POL-0086686
27.	POL00027664	Post Office Branch User Forum (The Forum) – draft Terms of Reference dated 19 August 2013	POL-0024305
28.	POL00116131	Email from Martin Edwards to Paula Vennells, copying in Susan Crichton, Alwen Lyons, and Theresa Iles dated 24 September 2013	POL-0117130
29.	POL00099050	Email from Martin Edwards to Mark Davies copying in Alwen Lyons, Paula Vennells, Lesley Sewell, Susan Crichton and Theresa Iles dated 6 July 2013	POL-0098633
30.	POL00116250	Email from Martin Edwards to Belinda Crowe, Chris Aujard and David Oliver dated 5 February 2014	POL-0117244
31.	POL00116251	Note from David Oliver to Paula Vennells copying in Chris Aujard, Belinda Crowe and Martin Edwards dated 5 February 2014	POL-0117245
32.	POL00108257	Email from Martin Edwards to Paula Vennells and Theresa Iles dated 13 February 2014	POL-0110963
33.	POL00107151	Letter from Alan Bates to Sir Anthony Hooper dated 10 November 2014	POL-0105459
34.	POL00116133	Email from Mark Davies to Paula Vennells dated 24 September 2013	POL-0117132
35.	POL00116145	Email from Martin Edwards to Alice Perkins dated 2 October 2013	POL-0117144