1	<i>(</i> 0 <i>)</i>	Thursday 25 July 2024
2 3	·	IS am)
3 4		BEER: Good morning, sir. Can you see and hear us? BRIAN LANGSTAFF: Yes, thank you very much.
4 5		BEER: May I call Sir Vince Cable, please.
6	IVIT	THE RIGHT HONOURABLE SIRJOHN VINCENT CABLE (sworn)
7		Questioned by MR BEER
8	MR	BEER: Good morning, Sir Vince. My name is Jason Beer
9		and I ask questions on behalf of the Inquiry. Can you
10		give us your full name, please?
11	Α.	John Vincent Cable.
12	Q.	Thank you. For those listening and watching, if I'm
13		speaking in more than usually loud voice today and if
14		I'm getting closer to the microphones than is usual,
15		there is a good reason for that, which Sir Vince
16		understands?
17	Α.	Thank you very much. I appreciate it.
18	Q.	Can you look at a witness statement that you've kindly
19		prepared for the Inquiry, please, it's in front of you.
20		So it should be 53 pages long and dated 27 June 2024.
21		If you look at the last page, page 53, do you see your
22		signature?
23	Α.	Yes, I do.
24	Q.	Are the contents of that witness statement true to the
25		best of your knowledge and belief?
		1
1	Q.	During that period, is it right that there was a junior
2		minister responsible for postal affairs?
3	Α.	Yes, I think there were six or seven junior ministers
4		and one was responsible for postal affairs, amongst
5		other things, most notably, I think, labour relations,
6		consumer protection.
7	Q.	You list them in paragraph 21 of your witness
8		statement no need for it to be turned up but there
9		were a succession of junior ministers with
10		responsibility for postal affairs in that five-year
11		period; is that right?
12	Α.	Yes, there were four.
13	Q.	Was that a regular or normal number of junior ministers

13	Q.	Was that a regular or normal number of junior ministers
14		holding down a post over that kind of period?

Well, I think there was quite a high turnover generally. 15 Α. 16 The four ministers we've referred to were people from my party, the other junior ministers were Conservatives, 17

- but they had a turnover which was really directed by the 18
- Prime Minister. My group of ministers were essentially 19 20 appointed by Nick Clegg and worked with me.
- 21 Did you get any sense that there was churn, as it's Q.
- 22 sometimes referred to, in that ministerial post that may
- 23 have made it difficult for the person occupying it to
- 24 grasp/fully understand/get to grips with post Office 25
 - issues?

- 1 Δ Yes, they are true to the best of my knowledge and 2 belief.
- Q. Thank you very much. You can put that to one side now. 3 4
- All of the other documents I will show you will come up 5 on the screen.
 - I think by training and background you are
- 7 an economist; is that right?
- 8 A. Yes, that's right, yes.
- 9 Q. After university and the like, you entered the Civil 10 Service; is that correct?
- A. For a couple of years, yes, and then I was later 11
- a Special Adviser within the Department of Trade and 12 13 Industry but mostly not in the Civil Service, but I had
- 14 a stretch there.
- 15 Q. Then you worked in business before being elected to
- 16 Parliament in 1997; is that right?
- 17 A. Correct, yes.
- Q. So far as concerns this Inquiry, the most important 18
- 19 office you held was as Secretary of State for Business,
- 20 Innovation and Skills, and was that between 12 May 2010
- 21 and the 12 May 2015?
- 22 Α. Yes, that was the full length of the Coalition
- 23 Government.
- Q. So five years? 24
- 25 A. Five years, yes.
- 2
- 1 Α. I wouldn't say abnormally so. I mean, I was unusual in 2 having five years in my office. I think under the 3 government that has just passed, we had Cabinet 4 Ministers who held jobs for a few months but I was 5 unusual. I think, in Jo Swinson's case, there was 6 an interruption because of the maternity leave. That 7 was, I think, very understandable, that wasn't really 8 churn. But the others were changed because of 9 an overall mix in our ministerial portfolio: Ed Davey 10 became a Secretary of State, for example. Q. Did you get any sense in your period of office that the 11 12 brief held by the person responsible for postal affairs, 13 the minister responsible for postal affairs, was too 14 broad, ie there was too much to do? 15 Well, there was a vast amount within the Department, Α. I think we may come to this in more detail later, but in 16 17 the briefing pack, the topical briefing pack, I noticed there was a list of 100 items which came within my 18 portfolio, roughly, and Post Office was one of them, and 19 20 the portfolio had to be divided up between ministers and 21 civil servants. The Post Office was part of a junior 22 minister's portfolio and I think that was proportionate, 23 given the wide range of things that we had to do. 24 Q. Did any of the Junior Ministers in your time ever raise 25 with you a problem as to capacity, such that they 4

1		couldn't give postal affairs sufficient attention?	
2	Α.	No, I don't think so. I mean, in my judgement they were	:
3		highly conscientious and very intelligent ministers and	:
4		very capable and perfectly capable of handling the	
5		responsibility. I met them regularly as party	:
6		colleagues and ministers, we talked formally and	
7		informally and they kept me abreast of issues which they	
8		found particularly important.	
9	Q.	In paragraph 2 of your witness statement again, no	
10		need to turn it up you say:	1
11		"I am informed that a large number of documents	1
12		which should have been retained cannot be located, such	1
13		as my official diary and minutes of meetings."	1
14		Sir Ed Davey and Jo Swinson have said similar things	1
15		to the Inquiry. Do you know why such papers, including	1
16		your official diary, which is presumably an important	1
17		record of your activities, was not retained?	1
18	Α.	I have no idea why they weren't retained but there	1
19		were in my case, there were some what I call seminal	1
20		meetings which were never recorded. I had a first	2
21		courtesy call meeting with Paula Vennells and Alice	2
22		Perkins, for example. There doesn't seem to be any	2
23		record of that, though I registered with them some of my	2
24		concerns about the Post Office at that point. There was	2
25		a meeting where a Member of Parliament, Mr Bridgen, 5	2
1		which cast doubt on the safety of criminal convictions	
1		which cast doubt on the safety of criminal convictions	
2		obtained by the Post Office when acting as a private	
2 3		obtained by the Post Office when acting as a private prosecutor; the CCRC, the Criminal Cases Review	:
2 3 4		obtained by the Post Office when acting as a private prosecutor; the CCRC, the Criminal Cases Review Commission, had commenced an investigation into the	
2 3 4 5		obtained by the Post Office when acting as a private prosecutor; the CCRC, the Criminal Cases Review Commission, had commenced an investigation into the safety of some convictions; second Sight, the forensic	
2 3 4 5 6		obtained by the Post Office when acting as a private prosecutor; the CCRC, the Criminal Cases Review Commission, had commenced an investigation into the safety of some convictions; second Sight, the forensic accountants, had been instructed and had produced four	
2 3 4 5 6 7		obtained by the Post Office when acting as a private prosecutor; the CCRC, the Criminal Cases Review Commission, had commenced an investigation into the safety of some convictions; second Sight, the forensic accountants, had been instructed and had produced four reports in that five-year period; it marked the	
2 3 4 5 6 7 8		obtained by the Post Office when acting as a private prosecutor; the CCRC, the Criminal Cases Review Commission, had commenced an investigation into the safety of some convictions; second Sight, the forensic accountants, had been instructed and had produced four reports in that five-year period; it marked the beginning, middle and end of the initial Complaint and	
2 3 4 5 6 7 8 9		obtained by the Post Office when acting as a private prosecutor; the CCRC, the Criminal Cases Review Commission, had commenced an investigation into the safety of some convictions; second Sight, the forensic accountants, had been instructed and had produced four reports in that five-year period; it marked the beginning, middle and end of the initial Complaint and Mediation Scheme run by the Post Office; Deloitte,	
2 3 4 5 6 7 8		obtained by the Post Office when acting as a private prosecutor; the CCRC, the Criminal Cases Review Commission, had commenced an investigation into the safety of some convictions; second Sight, the forensic accountants, had been instructed and had produced four reports in that five-year period; it marked the beginning, middle and end of the initial Complaint and Mediation Scheme run by the Post Office; Deloitte, forensic accountants, had completed reports on the	1
2 3 4 5 6 7 8 9		obtained by the Post Office when acting as a private prosecutor; the CCRC, the Criminal Cases Review Commission, had commenced an investigation into the safety of some convictions; second Sight, the forensic accountants, had been instructed and had produced four reports in that five-year period; it marked the beginning, middle and end of the initial Complaint and Mediation Scheme run by the Post Office; Deloitte, forensic accountants, had completed reports on the Horizon system.	1
2 3 4 5 6 7 8 9 10 11		obtained by the Post Office when acting as a private prosecutor; the CCRC, the Criminal Cases Review Commission, had commenced an investigation into the safety of some convictions; second Sight, the forensic accountants, had been instructed and had produced four reports in that five-year period; it marked the beginning, middle and end of the initial Complaint and Mediation Scheme run by the Post Office; Deloitte, forensic accountants, had completed reports on the	
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2 3 4 5 6 7 8 9 10 11 12 13 14 15	A.	obtained by the Post Office when acting as a private prosecutor; the CCRC, the Criminal Cases Review Commission, had commenced an investigation into the safety of some convictions; second Sight, the forensic accountants, had been instructed and had produced four reports in that five-year period; it marked the beginning, middle and end of the initial Complaint and Mediation Scheme run by the Post Office; Deloitte, forensic accountants, had completed reports on the Horizon system. I've given you a smattering of things that happened in that five-year period where you say Horizon barely came across your desk. Looking at it in the round, how do you think it is that Horizon barely came across your	1 1 1
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2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18	А.	obtained by the Post Office when acting as a private prosecutor; the CCRC, the Criminal Cases Review Commission, had commenced an investigation into the safety of some convictions; second Sight, the forensic accountants, had been instructed and had produced four reports in that five-year period; it marked the beginning, middle and end of the initial Complaint and Mediation Scheme run by the Post Office; Deloitte, forensic accountants, had completed reports on the Horizon system. I've given you a smattering of things that happened in that five-year period where you say Horizon barely came across your desk. Looking at it in the round, how do you think it is that Horizon barely came across your desk in that five-year period? Well, I think the general reason is that the officials who were briefing me and the ministers on the subject	1 1 1 1 1 1 1
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2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20	A.	obtained by the Post Office when acting as a private prosecutor; the CCRC, the Criminal Cases Review Commission, had commenced an investigation into the safety of some convictions; second Sight, the forensic accountants, had been instructed and had produced four reports in that five-year period; it marked the beginning, middle and end of the initial Complaint and Mediation Scheme run by the Post Office; Deloitte, forensic accountants, had completed reports on the Horizon system. I've given you a smattering of things that happened in that five-year period where you say Horizon barely came across your desk. Looking at it in the round, how do you think it is that Horizon barely came across your desk in that five-year period? Well, I think the general reason is that the officials who were briefing me and the ministers on the subject hadn't seen it as a particular problem. I think, with hindsight, I should have been told at the outset about	1 1 1 1 1 1 1 1 2
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	Α.	obtained by the Post Office when acting as a private prosecutor; the CCRC, the Criminal Cases Review Commission, had commenced an investigation into the safety of some convictions; second Sight, the forensic accountants, had been instructed and had produced four reports in that five-year period; it marked the beginning, middle and end of the initial Complaint and Mediation Scheme run by the Post Office; Deloitte, forensic accountants, had completed reports on the Horizon system. I've given you a smattering of things that happened in that five-year period where you say Horizon barely came across your desk. Looking at it in the round, how do you think it is that Horizon barely came across your desk in that five-year period? Well, I think the general reason is that the officials who were briefing me and the ministers on the subject hadn't seen it as a particular problem. I think, with hindsight, I should have been told at the outset about Horizon, what it was. It was just a word. I should	1 1 1 1 1 1 1 1 2 2
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	A.	obtained by the Post Office when acting as a private prosecutor; the CCRC, the Criminal Cases Review Commission, had commenced an investigation into the safety of some convictions; second Sight, the forensic accountants, had been instructed and had produced four reports in that five-year period; it marked the beginning, middle and end of the initial Complaint and Mediation Scheme run by the Post Office; Deloitte, forensic accountants, had completed reports on the Horizon system. I've given you a smattering of things that happened in that five-year period where you say Horizon barely came across your desk. Looking at it in the round, how do you think it is that Horizon barely came across your desk in that five-year period? Well, I think the general reason is that the officials who were briefing me and the ministers on the subject hadn't seen it as a particular problem. I think, with hindsight, I should have been told at the outset about Horizon, what it was. It was just a word. I should have been told that people were querying it you know,	1 1 1 1 1 1 1 1 2 2 2 2
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	A.	obtained by the Post Office when acting as a private prosecutor; the CCRC, the Criminal Cases Review Commission, had commenced an investigation into the safety of some convictions; second Sight, the forensic accountants, had been instructed and had produced four reports in that five-year period; it marked the beginning, middle and end of the initial Complaint and Mediation Scheme run by the Post Office; Deloitte, forensic accountants, had completed reports on the Horizon system. I've given you a smattering of things that happened in that five-year period where you say Horizon barely came across your desk. Looking at it in the round, how do you think it is that Horizon barely came across your desk in that five-year period? Well, I think the general reason is that the officials who were briefing me and the ministers on the subject hadn't seen it as a particular problem. I think, with hindsight, I should have been told at the outset about Horizon, what it was. It was just a word. I should have been told that people were querying it you know, good, competent people. Computer Weekly, for example,	1 1 1 1 1 1 1 1 1 2 2 2 2 2 2

izon IT	「 Inq	uiry 25 July 2024
1		brought the Federation to tell me about some of the
2		distressing cases of subpostmasters. There appears to
3		be no record of that either.
4	Q.	Have you asked why there is no record?
5	Α.	Yes, I was told that people had searched and couldn't
6		find it. I think probably it has to do with the
7		transition which was taking place from paper to digital.
8		When I first started the job, almost everything was done
9		on paper, letters came into the Department. I think, by
10		the end of it, it was email based and, for a variety of
11	~	reasons, complete records were not kept.
12	Q.	You tell us also in paragraph 2 of your witness
13		statement that, in your five years in office, problems
14 15		with Horizon barely came across your desk; is that
16	Α.	right? That is correct and, when they did, it was usually in
17	А.	a very uncontroversial way and it was not drawn to my
18		attention as an issue I should focus on.
19	Q.	That five-year period was a significant one in relation
20	ч.	to the unfolding events concerning Horizon, including,
20		within that five-year period, because campaigning work
22		was being undertaken by the Justice for Subpostmasters
23		Alliance; there was the threat of a class action being
24		brought against the Post Office in the courts; there had
25		been the discovery of evidence in that five-year period
		6
1		I should have been told about Mr Bates and the Justice
2		group. I never heard his name until I'd been in the job
3		five years at the end, when the whole issue came to
4		a head. But, certainly, I wasn't briefed on them and
5		I think probably this came down to civil servants making
6		a judgement that, because I had a vast area of
7		responsibility and because it was being well handled at
8 9		a minister level, that I didn't need to be told about them.
10	Q.	Thank you. You tell us in paragraph 4 of your witness
11	ч.	statement that governments across the political spectrum
12		share some responsibility for the fact that the scandal
13		happened on their watches and that you accept your share
14		of responsibility.
15	Α.	Yes, I to be frank, I found it very difficult to
16		pinpoint particular events or decisions that I could
17		have done differently but, simply as a matter of formal
18		responsibility, this was a state enterprise that came
19		within the remit of my Department and I accept the fact
20		that it happened on our watch. I know that's a cliché
21		but it's something that ministers have to recognise.
22	Q.	I was about to ask you, when you say that you accept
23		your share of responsibility, what are you accepting
24		responsibility for?
25	•	Well general oversight of the Department, and this was

25 A. Well, general oversight of the Department, and this was 8

1		an area of the Department where clearly there was
2		a policy failure.
3		As far as I recall, there weren't any specific
4		interventions that I made or was asked to make that
5		would have changed any of those long list of things that
6		you described.
7	Q.	Can we get down to some specifics then and start with
8		the issue of your knowledge of key issues relating to
9		subpostmaster challenges concerning Horizon. If we just
10		turn up paragraph 33 of your witness statement, it'll
11		come up on the screen, please. It's on page 12,
12		page 33. You're here dealing with, as part of your
13		chronological account, the period of time when you took
14		up office, and you say in 33:
15		"I was not briefed by officials on, or otherwise
16		aware of, any issues to do with the Post Office's IT
17		system at this time."
18		If we go back to paragraph 13 of your witness
19		statement, which is on page 5, thank you. This is years
20		before you took up office.
21	Α.	Yes.
22	Q.	In this part of your witness statement, you're telling
23		us more generally about your knowledge of the Post
24		Office.
25	Α.	Yes.

1 involved in a separate issue, a closure issue, and that 2 had given you some insight into the way that POL middle 3 management the behaved; is that right? 4 A. That's correct. Just to elaborate a little bit, I had 5 raised a debate in Parliament, I think probably I was 6 one of the first, about the way postmasters were treated 7 by the Post Office, and there was a particular case, 8 which you haven't referred to, but there's a particular 9 case of a woman in my constituency who had invested, 10 I think, £75,000 in her post office. It was taken away 11 from her for reasons that were never clearly explained, 12 she lost all the money. Another post office opened up 13 nearby for reasons that were never explained. 14 I never got good answers for why this was happening, 15 so I called the debate and it basically chimed in with 16 other experiences I had of the Post Office. For 17 example, I'd been campaigning for months on Post Office 18 closures in my own constituency and others and I took 19 them to the Post Office and it was all sort of brushed 20 aside, I was an interfering politician, it was nothing 21 to do with me, operational matters were matters for the 22 Post Office and not for ministers or politicians. And 23 so I'd formed a very negative impression, in the case, 24 and it was reinforced in Government because, as I think 25 I mentioned a few minutes ago, that I think the one

1	Q.	You say:
2		"I became aware of allegations of fraud when
3		a constituent was charged and lost his post office.
4		[You] cannot recall exactly when this was probably
5		around 2001-2002. [You] approached the family and
6		offered help. They told me that the charges were
7		unjustified but they wanted to rely on 'justice' and not
8		involve me as MP. The family never mentioned IT."
9		Then, thirdly, in paragraph 92 of your witness
10		statement, which is on page 37, you say:
11		"Before I came into government, I think I had 8
12		closures in my constituency I organised and
13		collected numerous petitions against branch closures
14		Usually postmasters did not want to become involved,
15		because they were afraid of the consequences."
16		Then this:
17		"When we came into Government, Ed Davey and I agreed
18		based on our experience as constituency MPs that [Post
19		Office Limited] middle management were, as I described
20		[and you refer to a debate in Parliament in 1999]
21		'authoritarian'. Mr Bates has, I believe, described
22		them as 'thugs in suits' and I recognise this
23		description. [Post Office] dealt with us in an arrogant
24		way when we campaigned against closures."
25		Drawing the threads together there, you had been 10
1		occasion when I was a minister where these distressing
2		cases were brought to me was by a deputation not
2		a deputation a single man, a man from the Federation,
4		I think, about 50 to 100 cases, he brought a scrapbook
5		of photographs to illustrate it. So I knew that these
6		expulsions, fraud cases, and so on, were taking place
7		but, throughout the whole of that, in none of these
8		cases did anybody, as far as I remember, ever say
9		anything about the computers.
10		It was seen as as I saw it I had a theory
11		which may have been proved to be wrong but, essentially,
12		the Post Office had what I would call a 'one strike and
13		you're out' policy, that if a postmaster made a mistake
14		they would be punished severely not necessarily
15		anything to do with computing mistakes, that emerged
16		subsequently. And if I can just add one final point,
17		that when I was campaigning on behalf of postmasters at
18		that stage, and it was 10 years before I went into the
19		Government, I did get a lot of help from the Federation,
		, ,

Mr Baker, who was in charge at that point, and they

helped me to obtain compensation for the postmistress who had been evicted in my constituency. She was fully

12

22 23 compensated and it was with the help of the Federation.

24 So I, thereafter, tended to have a very positive 25 view about them and trusted their judgement.

20

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(3) Pages 9 - 12

1	Q.	You say here that POL middle management was	1	Δ	I wasn't aware of that at all. I knew that the
2	Ξ.	authoritarian and you recognised the description of them	2	7.1	these fraud cases because, as I've mentior
3		applied by Sir Alan as "thugs in suits"; what about your	3		delegation brought to me by Mr Bridgen, ar
4		dealings with them led you to those views?	4		the Post Minister what action we were takin
5	Α.	Well, it was the description of what happened when	5		at that point that I was told about Second S
6		well, in the particular cases I brought to Parliament,	6		forensic accountant, and I think reasonably
7		but I'd heard of others about what happened when	7		there was now a process to deal with it. Th
8		a postmaster made a mistake. I mean, in the case of my	8		only occasion on which this came to my atte
9		constituent, the only thing that we had identified was	9	Q.	When did you first become aware that Post
10		that Twickenham residents had gone into the post office	10		investigated and privately prosecuted its ov
11		and found that the person behind the counter didn't know	11		subpostmasters and mistresses?
12		that Santiago was the capital of Chile, and a complaint	12	Α.	· · · · · · · · · · · · · · · · · · ·
13		had been made and, on the basis of this complaint, she	13		differentiation. I think the kind of common v
14		had been had her franchise taken away from her.	14		looking at it was if somebody was charged
15		Certainly, when I raised that issue and closures	15		was all a matter to do with the police and th
16		with the Post Office officials who I met around	16		The distinction that you draw and subseque
17		closures, the attitude came across to me very much as it	17		was not something I was aware of.
18		was described here.	18	Q.	Not aware of at any time in your period of o
19	Q.	It was as a result of meeting them face-to-face?	19	Α.	Well, I think right at the end, when we had t
20	Α.	It was indeed and through the attitude that was revealed	20		together of Mr Arbuthnot's question in Parlia
21		in correspondence at the time.	21		the report of the Select Committee, I started
22	Q.	If we turn to the period when you took up office that	22		a lot of questions about what was going on
23		can come down from the screen, thank you when were	23		that was one of the issues which emerged
24		you first aware of individual subpostmasters challenging	24		then, the question had never arisen.
25		the Post Office's enforcement action against them? 13	25	Q.	When did you first become aware of concernation 14
1		subpostmasters had been prosecuted on the basis of	1		draft referred to above. As David Miliband
2		Horizon data, which may not be reliable?	2		Counsellor, normally I would have been asl
3	Α.	Well, I think it was then, very much at the end of the	3		response as a matter of courtesy though
4		Parliament when we had that coincidence of events, and	4		in the summer recess and [you] may not ha
5 6	•	I was brought in to the picture.	5 6		available"
7	Q.	If we turn up your witness statement, please, at page 14 and paragraph 40, you say:	0 7		Can we look at the letter, please. UKG This was the draft letter to which you were i
8		"In the course of preparing this statement, my	8		those paragraphs and it begins, you'll see,
9		attention has been drawn to an unsigned letter dated	9		Mr Miliband for his letter of the 23rd, enclose
10		'August 2012' to David Miliband MP, apparently a draft	10		a letter from Mr Carter, and continues:
11		prepared by officials on my behalf I understand this	11		"I have noted Mr Carter's experiences
12		letter to have been held by UKGI, and it is therefore	12		as subpostmaster [but] note that Post Office
13		reasonable to assume that it was drafted by officials in	13		fully confident about the robustness and int
14		the Shareholder Executive. The draft letter indicates	14		its Horizon and related accounting process
15		it is a response to a letter from Mr Miliband dated	15		Next paragraph:
16		23 July 2012, which apparently enclosed a letter from	16		" in the light of discussions with Jame
17		his constituent, Kevin Carter. I have seen neither	17		Arbuthnot and a number of other MPs with
18		David Miliband's nor Kevin Carter's letter."	18		ex-subpostmaster constituents [Post Office
19		You then quote from the letter, which I'll skip	19		agreed to an external independent review of
20		over. If we go over the page, please, and look at	20		number of individual cases that had been ra
21		paragraph 41, you say:	21		them by several MPs."
22		"I have no recollection of this correspondence at	22		If we go down, please, we'll see it's got
		all. I've not seen a signed and dated version of this	23		at the bottom but, as you say, you've not se
23					
23 24		letter, though it is fair to assume that someone in the	24		version of this letter. For letters like this, w

I	Α.	I wasn't aware of that at all. I knew that there were
2		these fraud cases because, as I've mentioned, I had this
3		delegation brought to me by Mr Bridgen, and I had asked
1		the Post Minister what action we were taking, and it was
5		at that point that I was told about Second Sight, the
3		forensic accountant, and I think reasonably assumed that
7		there was now a process to deal with it. That was the
3		only occasion on which this came to my attention.
)	Q.	When did you first become aware that Post Office both
0		investigated and privately prosecuted its own
1		subpostmasters and mistresses?
2	Α.	Well, I wasn't aware specifically about that
3		differentiation. I think the kind of common way of
4		looking at it was if somebody was charged with fraud it
5		was all a matter to do with the police and the courts.
6		The distinction that you draw and subsequently emerged
7		was not something I was aware of.
8	Q.	Not aware of at any time in your period of office?
9	Α.	Well, I think right at the end, when we had this coming
0		together of Mr Arbuthnot's question in Parliament and
1		the report of the Select Committee, I started to ask
2		a lot of questions about what was going on and I think
3		that was one of the issues which emerged but, until
4		then, the question had never arisen.
5	Q.	When did you first become aware of concerns that
0	ч.	14
1		draft referred to above. As David Miliband was a Privy
2		Counsellor, normally I would have been asked to sign the
3		response as a matter of courtesy though this was
1		in the summer recess and [you] may not have been
5		available"
5		Can we look at the letter, please. UKGI00013690.
7		This was the draft letter to which you were referring in
2		those paragraphs and it begins, you'll see, by thanking
)		Mr Miliband for his letter of the 23rd, enclosing
, 0		a letter from Mr Carter, and continues:
1		"I have noted Mr Carter's experiences and concerns
2		as subpostmaster [but] note that Post Office remains
3		fully confident about the robustness and integrity of
4		its Horizon and related accounting processes."
5		Next paragraph:
6		" in the light of discussions with James
7		Arbuthnot and a number of other MPs with
8		ex-subpostmaster constituents [Post Office] recently
o 9		
_		agreed to an external independent review of a small
0 1		number of individual cases that had been raised with
1 2		them by several MPs."
2 3		If we go down, please, we'll see it's got your name
		at the bottom but, as you say, you've not seen a signed
4		version of this letter. For letters like this, would

(4) Pages 13 - 16

1	Α.	Yes, I would, but let me just explain a little bit of
2		the background. I think the clue to this particular
3		letter is in the date. It was August. I was rarely, if
4		ever, in the Department in August because that was the
5		month I was sent on overseas visits to China, India,
6		whatever, to negotiate trade and investment agreements.
7		It was also the month I took short holidays with my
8		wife. So I almost certainly never saw the letter or the
9		incoming letter but maybe it will help answer your
10		question, I think, if I describe the process by which
11		correspondence was dealt with in my office and
12		I personally related to. The situation
13	Q.	Just before you do, we've got a very detailed account
14		from you in your witness statement as to how
15		correspondence was dealt with. I just wanted to ask you
16		a few questions about how the correspondence was managed
17		within the Department and your private office.
18	Α.	Yes, maybe I can help with that. The problem was that
19		I think there were about several hundred letters a day
20		and emails, would come addressed to me personally.
21		I never saw them they would be directed by the
22		Correspondence Unit to the relevant civil servants who
23		would prepare replies, either by other civil servants or
24		by the Post Minister and very, very occasionally to me,
25		if there was a special reason as I say, Mr Miliband
		17
1		and it would have been sent out by my office PP'd on my
2		behalf.
3	Q.	You see in the second paragraph it refers to Post Office
4	Ξ.	remaining fully confident about the robustness and
5		integrity of the Horizon system and related accounting
6		processes. What enquiries would you expect to have been
7		undertaken and by whom, whether in private office, ShEx,
8		or otherwise, in order to confirm or stand up what is
9		said there?
10	Α.	Well, I would have expected and I think I said this
11		to you earlier that when I first came into office

11 to you earlier, that when I first came into office

12 I would have expected to have been told that there were

13 questions being raised about this system, both by

- 14 Computer Weekly and by the Justice group, but I wasn't
- 15 and all I was ever told was -- and it appeared in
- 16 letters and in annexes to briefs that I was given --
- that this was an issue that wasn't controversial.
 I mean, bear in mind, I think, that, like, I think,
- 19 most politicians and most officials, I wasn't computer
- 20 literate. If somebody had said to me there was
- 21 a problem of integrity in a computer system, I wouldn't
- 22 have understood what on earth they meant. So I was very
- 23 reliant, as we all were, on the competence and integrity
- 24 of the people who were giving advice.
- 25 **Q.** My question was more what enquiries would you expect, if 19

1		was a Privy Counsellor and a letter of this kind
2		would come to me probably in a folder and it would be
3		explained by the civil servants, and my private office,
4		that this was a standard letter, that it had been agreed
5		with the Post Minister's office, it was the Departmental
6		line, and all I needed to do was sign it because there
7		was nothing controversial or difficult in it.
8	Q.	Just stopping there, Sir Vince, when you say it would
9		have been explained by officials in your private office
10		to you
11	Α.	Yes.
12	Q.	in a covering submission, covering document, or
13		explained orally to you?
14	Α.	Well, I think in a case like this there may not even
15		have been a covering document because it was seen as
16		a routine bit of correspondence, and I would sometimes
17		have put in front of me a pile of letters for signing on
18		totally different subjects, and I would be told "These
19		are standard letters, you don't need to study them in
20		the way that, you know, other controversial issues
21		needed to be studied".
22		I mean, if I'd had time and opportunity I would
23		almost certainly have spent as much time as I could
24		reading them and absorbing them but, as I say, in this
25		particular case, I almost certainly never saw the letter
		18
1		any, officials to have carried out before recommending
2		the inclusion of a line like this in a letter to be
2		signed by you?
3 4	Δ	Well I think the civil servants who dealt with it

- 4 Α. Well, I think the civil servants who dealt with it --5 I find it difficult to put myself in their minds, these 6 were people who were working full time on computer 7 related issues, I would certainly have expected them to 8 consult somebody independent, to have validated this 9 claim and probably to have taken time to interrogate the 10 people who were offering criticisms, and it appears 11 there were, at that time. But, no, I wasn't in their 12 mind. It wasn't a subject I was remotely familiar with 13 and I had to accept and trust the advice I was given 14 because, I mean, that is ultimately how Government 15 works. 16 Q. Yes. 17 Α. You have to trust advice. 18 Would you have regarded it as sufficient if officials Q. 19 had lines provided for them by Post Office and simply 20 incorporated those into letters that were to be sent out 21 in your name or junior ministers' names, without the 22 kind of testing or challenge that you've just mentioned? 23 A. Well, there should have been a testing or challenge at 24 some point but, having established, as they seemed to
- 25 have done, that there wasn't a problem, it would have 20

1		been reasonable then to have accepted the Post Office	1	an imbalance in the relationship between the Post Office
2	~	wording.	2 3 A	and subpostmasters?
3 4	Q.	So you would have expected at some point a moment of challenge or deep investigation to	3 4	. Well, it was based on largely on my own personal
4 5	٨	Yes	4 5	experience, which I've already described to you that
6		have occurred	5 6	I had called a debate in Parliament 10 years earlier, expressing my unhappiness with the way that postmasters
-			7	
7		I think that's reasonable.		were dealt with. And there was actually a broader
8 9	Q.	in order to start up the use of the lines provided by	8 9	policy issue which engaged me, in the sense that I was
9 10		Post Office about Horizon, even if, thereafter, the line	9 10	responsible, overall, for competition policy and there
10	Α.	was perpetuated without further investigation? Yes, I would have expected an interrogation of the	10	are, in the country, a whole set of cases where you have a what you might call a monopoly the technical word
12	А.	issue, of course.	12	is monopsony but, sorry, I don't want to get into
13	Q.		12	complex economics here but where you had a powerful
14	ω.	that up, please it's on page 11 you say:	13	organisation with large numbers of suppliers, and we had
15		"Upon my appointment I set three objectives for the	14	that situation with, say, farmers and supermarkets, we
16		Department and Ministers"	15	brought in legislation to protect the farmers.
17		Then if we go over the page, please, and the third	10	We did the same with publicans and pub-goers, which
18		of them it hasn't got a (c) next to it but I think it	18	took a great deal of time and Jo Swinson's time, and
19		is the third of them is:	10	I was aware there was a similar problem with the Post
20		"To address the imbalance in the relationship	20	Office, and I had thought, at the outset, we needed to
21		between the Post Office and subpostmasters, giving	20	change this situation.
22		postmasters a greater say in the running of the network,	22	And the idea came up, I think it was Ed Davey in his
23		and to advance, in partnership with the Federation, the	23	discussions with the Federation, that the best way to
24		idea of mutualisation."	24	deal with this problem was to create a mutual structure
25		What lay behind your understanding that there was	25	which would effectively put the postmasters in charge of
		21		22
1		the post office.		. Well, I never saw any of this kind of letter for the
2		It was an ambitious idea and, unlike the other two	2	reasons I described. Because of the way the
2 3		It was an ambitious idea and, unlike the other two objectives, this didn't come to fruition unfortunately	2 3	reasons I described. Because of the way the Correspondence Unit operated, there would be very large
2 3 4		It was an ambitious idea and, unlike the other two objectives, this didn't come to fruition unfortunately but that was where the idea came from.	2 3 4	reasons I described. Because of the way the Correspondence Unit operated, there would be very large numbers of incoming letters, they were immediately sent
2 3 4 5	Q.	It was an ambitious idea and, unlike the other two objectives, this didn't come to fruition unfortunately but that was where the idea came from. Can we look, please, at POL00059303, and look at page 2,	2 3 4 5	reasons I described. Because of the way the Correspondence Unit operated, there would be very large numbers of incoming letters, they were immediately sent to the relevant part of the Department to prepare
2 3 4 5 6	Q.	It was an ambitious idea and, unlike the other two objectives, this didn't come to fruition unfortunately but that was where the idea came from. Can we look, please, at POL00059303, and look at page 2, please, and scroll down a little further. You'll see	2 3 4 5 6	reasons I described. Because of the way the Correspondence Unit operated, there would be very large numbers of incoming letters, they were immediately sent to the relevant part of the Department to prepare an answer and the answer would come back through either
2 3 4 5 6 7	Q.	It was an ambitious idea and, unlike the other two objectives, this didn't come to fruition unfortunately but that was where the idea came from. Can we look, please, at POL00059303, and look at page 2, please, and scroll down a little further. You'll see this is a letter from Yasmin Qureshi, the then MP for	2 3 4 5 6 7	reasons I described. Because of the way the Correspondence Unit operated, there would be very large numbers of incoming letters, they were immediately sent to the relevant part of the Department to prepare an answer and the answer would come back through either a civil servant or through the Post Minister. In this
2 3 4 5 6 7 8	Q.	It was an ambitious idea and, unlike the other two objectives, this didn't come to fruition unfortunately but that was where the idea came from. Can we look, please, at POL00059303, and look at page 2, please, and scroll down a little further. You'll see this is a letter from Yasmin Qureshi, the then MP for Bolton South East. Then if we go back to page 1,	2 3 4 5 6 7 8	reasons I described. Because of the way the Correspondence Unit operated, there would be very large numbers of incoming letters, they were immediately sent to the relevant part of the Department to prepare an answer and the answer would come back through either a civil servant or through the Post Minister. In this case, it was judged that I didn't need to be involved
2 3 4 5 6 7 8 9	Q.	It was an ambitious idea and, unlike the other two objectives, this didn't come to fruition unfortunately but that was where the idea came from. Can we look, please, at POL00059303, and look at page 2, please, and scroll down a little further. You'll see this is a letter from Yasmin Qureshi, the then MP for Bolton South East. Then if we go back to page 1, please, you'll see it's dated 25 October 2012, and it's	2 3 4 5 6 7 8 9	reasons I described. Because of the way the Correspondence Unit operated, there would be very large numbers of incoming letters, they were immediately sent to the relevant part of the Department to prepare an answer and the answer would come back through either a civil servant or through the Post Minister. In this case, it was judged that I didn't need to be involved and, certainly, I never saw the letter. But the content
2 3 4 5 6 7 8 9 10	Q.	It was an ambitious idea and, unlike the other two objectives, this didn't come to fruition unfortunately but that was where the idea came from. Can we look, please, at POL00059303, and look at page 2, please, and scroll down a little further. You'll see this is a letter from Yasmin Qureshi, the then MP for Bolton South East. Then if we go back to page 1, please, you'll see it's dated 25 October 2012, and it's addressed directly to you. It concerns Chirag Patel.	2 3 4 5 6 7 8 9 10	reasons I described. Because of the way the Correspondence Unit operated, there would be very large numbers of incoming letters, they were immediately sent to the relevant part of the Department to prepare an answer and the answer would come back through either a civil servant or through the Post Minister. In this case, it was judged that I didn't need to be involved and, certainly, I never saw the letter. But the content of it is familiar, because of the case I was familiar
2 3 4 5 6 7 8 9 10	Q.	It was an ambitious idea and, unlike the other two objectives, this didn't come to fruition unfortunately but that was where the idea came from. Can we look, please, at POL00059303, and look at page 2, please, and scroll down a little further. You'll see this is a letter from Yasmin Qureshi, the then MP for Bolton South East. Then if we go back to page 1, please, you'll see it's dated 25 October 2012, and it's addressed directly to you. It concerns Chirag Patel. If we scroll down, please, if you just read to yourself	2 3 4 5 6 7 8 9 10 11	reasons I described. Because of the way the Correspondence Unit operated, there would be very large numbers of incoming letters, they were immediately sent to the relevant part of the Department to prepare an answer and the answer would come back through either a civil servant or through the Post Minister. In this case, it was judged that I didn't need to be involved and, certainly, I never saw the letter. But the content of it is familiar, because of the case I was familiar with in Twickenham, it sounded very similar to this,
2 3 4 5 6 7 8 9 10 11 12	~	It was an ambitious idea and, unlike the other two objectives, this didn't come to fruition unfortunately but that was where the idea came from. Can we look, please, at POL00059303, and look at page 2, please, and scroll down a little further. You'll see this is a letter from Yasmin Qureshi, the then MP for Bolton South East. Then if we go back to page 1, please, you'll see it's dated 25 October 2012, and it's addressed directly to you. It concerns Chirag Patel. If we scroll down, please, if you just read to yourself what is said in the first six paragraphs.	2 3 4 5 6 7 8 9 10 11 12	reasons I described. Because of the way the Correspondence Unit operated, there would be very large numbers of incoming letters, they were immediately sent to the relevant part of the Department to prepare an answer and the answer would come back through either a civil servant or through the Post Minister. In this case, it was judged that I didn't need to be involved and, certainly, I never saw the letter. But the content of it is familiar, because of the case I was familiar with in Twickenham, it sounded very similar to this, except that the IT dimension wasn't in evidence there,
2 3 4 5 6 7 8 9 10 11 12 13	А.	It was an ambitious idea and, unlike the other two objectives, this didn't come to fruition unfortunately but that was where the idea came from. Can we look, please, at POL00059303, and look at page 2, please, and scroll down a little further. You'll see this is a letter from Yasmin Qureshi, the then MP for Bolton South East. Then if we go back to page 1, please, you'll see it's dated 25 October 2012, and it's addressed directly to you. It concerns Chirag Patel. If we scroll down, please, if you just read to yourself what is said in the first six paragraphs. Yes.	2 3 4 5 6 7 8 9 10 11 12 13	reasons I described. Because of the way the Correspondence Unit operated, there would be very large numbers of incoming letters, they were immediately sent to the relevant part of the Department to prepare an answer and the answer would come back through either a civil servant or through the Post Minister. In this case, it was judged that I didn't need to be involved and, certainly, I never saw the letter. But the content of it is familiar, because of the case I was familiar with in Twickenham, it sounded very similar to this, except that the IT dimension wasn't in evidence there, and it was the same kind of issue which was presented to
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2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	A. Q.	It was an ambitious idea and, unlike the other two objectives, this didn't come to fruition unfortunately but that was where the idea came from. Can we look, please, at POL00059303, and look at page 2, please, and scroll down a little further. You'll see this is a letter from Yasmin Qureshi, the then MP for Bolton South East. Then if we go back to page 1, please, you'll see it's dated 25 October 2012, and it's addressed directly to you. It concerns Chirag Patel. If we scroll down, please, if you just read to yourself what is said in the first six paragraphs. Yes. You'll see in the seventh paragraph it says: "The person who did the audit even said there was a problem with the computer because all the money in the post office was accounted for and it was not Mr Patel." Scrolling on, he had to pay £12,500 and then, over the page, if you just read what's on that page. Yes. If we just go back to page 1, looking at the letter, is this the kind of letter that you would have seen yourself?	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 7 17 18 19 20 4 21 22	 reasons I described. Because of the way the Correspondence Unit operated, there would be very large numbers of incoming letters, they were immediately sent to the relevant part of the Department to prepare an answer and the answer would come back through either a civil servant or through the Post Minister. In this case, it was judged that I didn't need to be involved and, certainly, I never saw the letter. But the content of it is familiar, because of the case I was familiar with in Twickenham, it sounded very similar to this, except that the IT dimension wasn't in evidence there, and it was the same kind of issue which was presented to me by the Federation when the representative met me with Mr Bridgen. One of your objectives was addressing the imbalance in the relationship between Post Office and its subpostmasters and this kind of complaint speaks to that very issue, doesn't it? Yes, I thought a lot about how you dealt with this question of imbalance but the proposal I had made to Parliament 10 years earlier was that we did need to set

23

(6) Pages 21 - 24

1	Vennells, I had suggested that this is what the Post	1		So, yo
2	Office should do. But when I came into Government and	2		perfec
3	discussed this matter with Ed Davey, and I think	3		to cop
4	separately the Federation, we thought a more radical	4	Q.	Can w
5	solution was required and that's how the idea of	5		minist
6	mutualisation came up.	6		Т
7	In retrospect, probably we should have been more	7		page
8	modest and perhaps insisted that postmasters should be	8		it from
9	on the Board of the Post Office. I believe this has now	9		sent o
10	happened but, at the time, they weren't directly	10		Lamb
11	represented. But that would have achieved some of the	11		a Pos
12	objectives of mutualisation, without the full process	12		to in h
13	which took an inordinately long time.	13		replyir
14 Q	Given that one of your three key objectives for Post	14		Lamb
15	Office was to address the imbalance in the relationship	15		setting
16	between Post Office and subpostmasters, do you know why	16		proce
17	correspondence of this kind, which speaks to that very	17		subpo
18	issue, was not flagged to you?	18		"
19 A		19		S
20	reason I gave in my earlier answers: that I had a vast	20		we ha
21	portfolio, the civil servants in my private office and	21		expec
22	in the Department knew that this was I don't know,	22		you fr
23	1 or 2 per cent of my workload, and clearly judged that	23	_	Affairs
24	they didn't need to deal with me, if necessary, there	24	Α.	Yes, I
25	was a Post Minister who would deal with it on my behalf. 25	25		l have
1	a lot of complaints that MPs weren't getting answers, so	1		Crowr
2	I asked for more resources to beef up the Correspondence	2		Then
3	Unit. So the fact that proper letters were going out	3		".
4	was, in itself, an advance on where we'd been before.	4		any pi
5	But, yes, I recognised the letter, and there are several	5		Mrs H
6	messages in it, which were, I think, fairly consistent	6		Т
7	and consistent with what I'd heard.	7		were i
8	For example when I'd held my debate in Parliament in	8		false.
9	1999, the first thing that the Labour minister told me	9		proce
10	was, "I can't deal with this because this is	10		docun
11	an operational matter, and operational matters are the	11		the IT
12	responsibility of the Post Office"; and the second issue	12		F
13	which was pointed out to me is that, you know, there are	13		inquir
14	legal issues involved, there are court cases, ministers	14 15	•	includ
	cannot get involved in matters relating to the criminal law. So, ministers replying to letters were probably,	15	Α.	Well, a diffe
15 16		10	_	It is.
16		17	\mathbf{n}	
16 17	at each stage, having to explain that.	17	Q.	
16 17 18 Q	at each stage, having to explain that. You'll see that, as you say, in the second paragraph, it	18	Q. A.	whie
16 17 18 Q 19	at each stage, having to explain that. You'll see that, as you say, in the second paragraph, it says:	18 19		which have
16 17 18 Q 19 20	at each stage, having to explain that. You'll see that, as you say, in the second paragraph, it says: "The issues raised in your [Norman Lamb's] letter	18 19 20		which have l Office
16 17 18 Q 19 20 21	at each stage, having to explain that. You'll see that, as you say, in the second paragraph, it says: "The issues raised in your [Norman Lamb's] letter are operational and contractual matters between Post	18 19 20 21		which have the Office satisfi
16 17 18 Q 19 20 21 22	at each stage, having to explain that. You'll see that, as you say, in the second paragraph, it says: "The issues raised in your [Norman Lamb's] letter are operational and contractual matters between Post Office and [the postmistress] Mrs Henderson neither	18 19 20 21 22		which have b Office satisfi perfect
16 17 18 Q 19 20 21 22 23	at each stage, having to explain that. You'll see that, as you say, in the second paragraph, it says: "The issues raised in your [Norman Lamb's] letter are operational and contractual matters between Post Office and [the postmistress] Mrs Henderson neither I nor the Department can intervene in cases which are	18 19 20 21 22 23	Α.	which have b Office satisfi perfect in an o
16 17 18 Q 19 20 21 22	at each stage, having to explain that. You'll see that, as you say, in the second paragraph, it says: "The issues raised in your [Norman Lamb's] letter are operational and contractual matters between Post Office and [the postmistress] Mrs Henderson neither	18 19 20 21 22		which have I Office satisfic perfect

1		So, you know, it was a judgement on their part, it was
2		perfectly fair, that I simply would not have been able
3		to cope with the volume of correspondence.
4	Q.	Can we look at some of the responses that junior
5		ministers sent out. UKGI00013863, please.
6		Thank you. If we go to the bottom of the second
7		page and the top of the third page. In fact, we can see
8		it from that first page. We can see this is a letter
9		sent out by Ed Davey MP. You can see it's to Norman
10		Lamb who, ironically enough, was subsequently to be
11		a Postal Affairs Minister but here he is being written
12		to in his capacity as a backbench MP. Here, Ed Davey is
13		replying to a letter that had been sent to you by Norman
14		Lamb on behalf of his constituent, Allison Henderson,
15		setting out her concerns about Post Office audit
16		procedures and accusations levelled against
17		subpostmasters:
18		"I am replying as Minister for Postal Affairs."
19		So there are number of these. Just looking at what
20		we have seen this so far, is this what you would have
20 21		expected to have happened, namely a letter coming in to
21		you from a backbench MP, being passed to the Postal
22 23		
		Affairs Minister to respond to?
24 25	Α.	Yes, I would have expected that that was the process.
25		I have to say when I first came into Government, I got 26
1		Crown Court. She pleaded guilty to false accounting.
2		Then it is said:
3		" I understand, at no time during the case were
4		any problems with Horizon IT system raised by
5		Mrs Henderson or separately identified."
6		That line there, that no problems with the IT system
7		were raised by Mrs Henderson at any time, we know to be
8		false. She had raised in the course of the court
9		proceedings, on two occasions, including in formal
10		documents, her suggestion that the losses were caused by
11		the IT system.
12		For this kind of correspondence, what kind of
13		inquiry would you expect officials to make before
14		including in a letter information such as that?
15	A.	Well, in a way this is your earlier question in
16		
17		a different form
18	Q.	
	Q. A.	It is.
	Q. A.	It is. which is basically, at the outset, there did need to
19		It is. which is basically, at the outset, there did need to have been an interrogation of the claim by the Post
19 20		It is. which is basically, at the outset, there did need to have been an interrogation of the claim by the Post Office that there wasn't a problem but that, having been
19 20 21		It is. which is basically, at the outset, there did need to have been an interrogation of the claim by the Post Office that there wasn't a problem but that, having been satisfied, as apparently the civil servants were, it was
19 20 21 22		It is. which is basically, at the outset, there did need to have been an interrogation of the claim by the Post Office that there wasn't a problem but that, having been satisfied, as apparently the civil servants were, it was perfectly reasonable to incorporate that kind of comment
19 20 21 22 23	Α.	It is. which is basically, at the outset, there did need to have been an interrogation of the claim by the Post Office that there wasn't a problem but that, having been satisfied, as apparently the civil servants were, it was perfectly reasonable to incorporate that kind of comment in an outgoing letter.
19 20 21 22 23 24		It is. which is basically, at the outset, there did need to have been an interrogation of the claim by the Post Office that there wasn't a problem but that, having been satisfied, as apparently the civil servants were, it was perfectly reasonable to incorporate that kind of comment in an outgoing letter. This goes slightly further. It has a bit of a dig at
19 20 21 22 23	Α.	It is. which is basically, at the outset, there did need to have been an interrogation of the claim by the Post Office that there wasn't a problem but that, having been satisfied, as apparently the civil servants were, it was perfectly reasonable to incorporate that kind of comment in an outgoing letter.

were given that line by the Post Office, simply to cut

Well, it is a little odd, now you mention it but I don't really have anything add. I mean, this is a very high level of detail and I wasn't involved in drafting letters of this kind, so I can't really make any

No, I know you weren't involved; I'm just trying to explore with you whether, before you or your ministers put their names to letters, you had an understanding of what had gone on in the back office. If somebody had asked me to sign something, I'd either want to know if what's in it is true from my own personal knowledge or a little bit about the process which has gone into finding out the information and testing it?

Yes, well, I'd imagine that what happened was that the civil servants in BIS spoke to their opposite number on -- in the Post Office, and said, you know, "Can you give me the background to this case because I need to be able to give a full reply, and will you please tell me

what happened in the case of Mrs Henderson?", and would,

Thank you. Can we look, please, at UKGI00014038, March 2011, a letter out from Ed Davey to Glenda Jackson. The 30

I think, simply on matters of fact, have had to trust

And certainly when I, I think, first met Paula Vennells, the first courtesy meeting, I'd explained my history and I think she reminded me that this is exactly the way in which the relationship between me as a minister and her as a Chief Executive, must operate. You mentioned the '69 Act there, are you referring to

What did you understand that to say, by the time of the years 2010 to 2015, as to operational independence? Well, my understanding, which framed the way I dealt with issues, was that I had responsibility for the general kind of strategic direction of the Post Office and its financing, and that the Post Office were responsible for their relationships with individual

postmasters and operational decisions about the opening and closing of post offices. That was how I saw the

We've got in our pack a series of letters -- I'm just going to list them -- from MPs or constituents. I'll list them, one in October 2013, POL00195964 at page 3; one, December 2014, POL00218852, pages 1 to 4; and one where the date isn't clear, POL003454283. So letters in to you raising matters concerning the operation of the

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it into a letter?

intelligent comment on it.

the reply they were given.

the Post Office Act 1969?

Yes, yes.

distinction.

responsibility for operational matters.

1		now, she didn't complain when she had the opportunity to	1	
2		do so, namely in the court proceedings.	2	
3	Α.	Yes.	3	Α.
4	Q.	What would you expect officials to do, if anything,	4	
5		before including that kind of line in a letter?	5	
6	Α.	Well, this is a level of detail I'd never got involved	6	
7		in, drafting and preparing letters of this kind. So how	7	~
8		much detail I think there is a serious point, though,	8	Q.
9		which is that this issue about commenting on court	9	
10	~	cases. Throughout	10	
11	Q.	Put that to one side for the moment. I am asking you,	11	
12		as the Secretary of State, what you would expect	12	
13		officials to do before including this kind of content in	13	
14		a letter? If you say you don't know, and are not in	14	
15		a position to judge	15	
16	Α.	Well, this is in a level of detail that I really can't	16	Α.
17		make any useful comment on. As I said, I think it was	17	
18		incumbent on the officials in the Department to have	18	
19		established, in general terms, that the Post Office were	19	
20		acting correctly but, having established that, it was	20	
21		not unreasonable for them to reproduce versions of	21	
22	~	events that they were given.	22	
23	Q.	le given by Post Office?	23	~
24	A. Q.	Yes.	24	Q.
25	Q.	So you wouldn't see anything objectionable in, if they 29	25	
1		first paragraph thanking her for her letter of	1	
2		22 February 2011 to you on behalf of her constituent,	2	
3		Bhavisha Parekh, whose father was prosecuted for cash	3	
4		losses. It records that the constituent suggests that	4	
5		the Horizon computer system caused these losses?	5	
6		So, again, similar to what we see before in the	6	
7		terms of the architecture of the thing: letter in to you	7	Q.
8		but letter out from Ed Davey.	8	ч.
9	Α.	Yes.	9	A.
10	Q.	That would be the system operating as it should?	10	Q.
11	A.	Yes. That was how it worked.	11	
12	Q.	There are quite number of these letters but just to see	12	Α.
13	-4-	this is a repetition, in the second paragraph:	13	
14		"The issues raised in your letter are	14	
15		operational and contractual matters between Post	15	
16		, Office", et cetera.	16	
17		Was that a line that you were familiar with, a line	17	
18		to take?	18	
19	Α.	Yes, I was very familiar with that because that was	19	
20		exactly what I was told when I had raised cases in	20	Q.
21		Parliament on behalf of the postmaster, that they had	21	
22		I think I had a 15-minute reply from the then Labour	22	
23		Minister and the first five minutes were explaining the	23	
24		legislation under which the Post Office operated, '69	24	
25		Act, which made it very clear that they had	25	
		31	_0	

	Horizon system and action taken against subpostmasters.	1	
	Would you expect anyone, in your office or	2	
	otherwise, to draw together correspondence which was of	3	
	the same or substantially the same nature, ie was	4	
	complaining about the same thing?	5	
Α.	Well, I would have expected the operational civil	6	
	servants, not necessarily my private office, to have	7	
	been alert to a systemic problem if there was one. But	8	
	perhaps if I can just add another note, because the	9	
	letters you're drawing to my attention are letters from	10	
	MPs. I was very conscious from the outset that I didn't	11	
	want to be caught in what you might call a Sir Humphrey	12	Q
	situation, of being blindsided by officials who had,	13	
	say, a biased view. So I set up in Parliament, through	14	
	my so-called PPS, a system of surgeries so that MPs	15	
	could come and talk to me on a Monday evening with or	16	Α.
	without officials present, if there were any problems	17	
	they had.	18	Q
Q.	Just stopping you there, you explained some of this in	19	
	your witness statement.	20	Α.
Α.	Yes.	21	
Q.	Can you explain to those watching and listening what you	22	
	mean by a "Sir Humphrey situation"?	23	
Α.	Well, the fact that civil servants may have had a view	24	
	of the world which was different to mine and I needed to	25	
	33		
	I mean, they did on other issues.	1	
Q.	I mean, they did on other issues. Sorry, Sir Vince, are you saying it there that James	2	Q
Q.	I mean, they did on other issues. Sorry, Sir Vince, are you saying it there that James Arbuthnot was not concerned because he didn't raise the	2 3	Q
_	I mean, they did on other issues. Sorry, Sir Vince, are you saying it there that James Arbuthnot was not concerned because he didn't raise the matter with you?	2 3 4	_
Q. A.	I mean, they did on other issues. Sorry, Sir Vince, are you saying it there that James Arbuthnot was not concerned because he didn't raise the matter with you? No, I have read about his work and it was monumental,	2 3 4 5	Q. A.
_	I mean, they did on other issues. Sorry, Sir Vince, are you saying it there that James Arbuthnot was not concerned because he didn't raise the matter with you? No, I have read about his work and it was monumental, and he did enormous amount of good work. But, for	2 3 4 5 6	_
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A. Q. A. Q. A.	I mean, they did on other issues. Sorry, Sir Vince, are you saying it there that James Arbuthnot was not concerned because he didn't raise the matter with you? No, I have read about his work and it was monumental, and he did enormous amount of good work. But, for whatever reason, the MPs who were concerned about this issue never raised it with me in Parliament. They had abundant opportunities to do so. You're not being critical of them for failing to do so? No, not at all You're simply saying they took a different route? No, they took a different route and different MPs operate in different ways. No, I'm not remotely critical, particularly Lord Arbuthnot, as he is now, did a heroic job. I wouldn't dare to criticise him. Were you aware that, essentially, a boilerplate reply was being sent out in response to each and every one of these letters in from MPs that were being sent to you? Well, I wasn't aware of the letters as coming in or	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20	A. Q

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- 24 a line on issues and, having established it, reproduced
- it and it would have caused chaos if there'd been 25

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- be aware of that, and that's why I set up this system
- and people came to see me every week, MPs, on Post
- Office issues, not related to postmasters, but on Post
- Office issues. And I'm very surprised that, in the
- whole of the five-year period, with the single exception
- of Mr Bridgen, who brought the Federation, who didn't
- raise the IT issue, why none of the MPs who were

concerned about this ever came to talk to me about it.

- That was the way in which I could have challenged
- the officials but I was never given the ammunition to do SO.
- Q. Did you know that groups of MPs, quite a large number of
- MPs, were seeking to progress, during your period of
- office, the complaints of their constituents, led
- essentially by James Arbuthnot?
- Well, I discovered this in March 2015. Before that, ٩.
- I wasn't aware of it, no.
- Q. This may sound an awkward question: do you know why you weren't aware of it?
- Well, I -- optimistically, I would say it was because
- they had complete trust that the Post Minister was
- dealing with it properly. But the way Parliament worked
- was that I walked past Mr Arbuthnot and the other MPs
- several times a day and, if they were concerned, they
- would surely have stopped and said something to me. 34
 - a different response to every individual.
- Q. The alternative view might be that having a boilerplate response and sticking to it means that there's never any real investigation of the issues?
- A. Well, as I said several times already, I think, you know, there should have been at some point a careful interrogation of the issues but, having established
- a clear line of argument, it was entirely appropriate to be consistent in dealing with everybody who wrote in about it.
- Q. Can I turn to the second issue, then: the Second Sight investigations and the Mediation Scheme. Can we turn to paragraph 46 of your witness statement, which is on
- page 17. You say:
- "I am told that on 8 July 2013 the Second Sight Interim Report was published; I was not aware of this
- report or its contents at the time ..." When did you first hear about the Second Sight investigation and its Interim Report?
- Well, I don't think I did, except I did meet, you know, ٩.
- the ministers on a very regular basis. They may well
- have said in the course of reporting to me on what they
- were doing that this forensic investigation was taking
- 24 place and was proceeding normally. But I certainly was
- 25 never given a formal, detailed report on the work of

1		Second Sight. I only heard about it when I had this
2		visit from Mr Bridgen and the Federation, and I wanted
3		to follow it up and ask the postmaster the Post
4		Minister what was going on, and they told me that the
5		Second Sight investigation was taking place.
6		I didn't realise, incidentally, that it was an IT
7		investigation. I thought it was just a general
8		investigation into why so many postmasters were being
9		charged with fraud and losing their post offices.
10	Q.	When were you first aware that Second Sight were
11		undertaking an investigation?
12	Α.	Well, when I told the Post Minister that I'd had this
13		delegation and I was very worried about it and the
14		numbers of people and the distress of some of the cases,
15		and I said, "What are we doing about this?" And she
16		said I think it was Jo Swinson at that time "We
17		have just launched this forensic audit and investigation
18		and I'm sure that all your cases will have been dealt
19		with properly".
20	Q.	Would that be in the course of her first period of
21		office, 6 September 2012 onwards?
22	Α.	Yes, I'm sure it was. It may not even have been Jo; it
23		may have been, I think, Norman Lamb, briefly. But no,
24		from memory, I think it was Jo's time.
25	Q.	If we look, please, at UKGI00013690, we can see the
		37
1	Q.	To the private office of Jo Swinson and others within
1 2	Q.	To the private office of Jo Swinson and others within ShEx. The subject is "Subpostmasters News Story", can
	Q.	•
2	Q. A.	ShEx. The subject is "Subpostmasters News Story", can
2 3		ShEx. The subject is "Subpostmasters News Story", can you see that?
2 3 4	А.	ShEx. The subject is "Subpostmasters News Story", can you see that? Yes.
2 3 4 5	А.	ShEx. The subject is "Subpostmasters News Story", can you see that? Yes. It says: "Hi all
2 3 4 5 6	А.	ShEx. The subject is "Subpostmasters News Story", can you see that? Yes. It says:
2 3 4 5 6 7	А.	ShEx. The subject is "Subpostmasters News Story", can you see that? Yes. It says: "Hi all "Vince has seen this news article and thought it was
2 3 4 5 6 7 8	А.	ShEx. The subject is "Subpostmasters News Story", can you see that? Yes. It says: "Hi all "Vince has seen this news article and thought it was a good news story for the Post Office and good link to
2 3 4 5 6 7 8 9	А.	ShEx. The subject is "Subpostmasters News Story", can you see that? Yes. It says: "Hi all "Vince has seen this news article and thought it was a good news story for the Post Office and good link to the Trust and Transparency work. Any suggestions on
2 3 4 5 6 7 8 9	А.	ShEx. The subject is "Subpostmasters News Story", can you see that? Yes. It says: "Hi all "Vince has seen this news article and thought it was a good news story for the Post Office and good link to the Trust and Transparency work. Any suggestions on what we can do to take this forward?
2 3 4 5 6 7 8 9 10 11	А.	ShEx. The subject is "Subpostmasters News Story", can you see that? Yes. It says: "Hi all "Vince has seen this news article and thought it was a good news story for the Post Office and good link to the Trust and Transparency work. Any suggestions on what we can do to take this forward? "Thanks
2 3 4 5 6 7 8 9 10 11 12	А.	ShEx. The subject is "Subpostmasters News Story", can you see that? Yes. It says: "Hi all "Vince has seen this news article and thought it was a good news story for the Post Office and good link to the Trust and Transparency work. Any suggestions on what we can do to take this forward? "Thanks "Anna."
2 3 4 5 6 7 8 9 10 11 12 13 14	A. Q.	ShEx. The subject is "Subpostmasters News Story", can you see that? Yes. It says: "Hi all "Vince has seen this news article and thought it was a good news story for the Post Office and good link to the Trust and Transparency work. Any suggestions on what we can do to take this forward? "Thanks "Anna." Was she one of your private secretaries?
2 3 4 5 6 7 8 9 10 11 12 13	A. Q.	ShEx. The subject is "Subpostmasters News Story", can you see that? Yes. It says: "Hi all "Vince has seen this news article and thought it was a good news story for the Post Office and good link to the Trust and Transparency work. Any suggestions on what we can do to take this forward? "Thanks "Anna." Was she one of your private secretaries? I don't remember there were a lot of private
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2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17	A. Q.	ShEx. The subject is "Subpostmasters News Story", can you see that? Yes. It says: "Hi all "Vince has seen this news article and thought it was a good news story for the Post Office and good link to the Trust and Transparency work. Any suggestions on what we can do to take this forward? "Thanks "Anna." Was she one of your private secretaries? I don't remember there were a lot of private secretaries. I don't remember an Anna but I'm sure it was, yes.
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2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19	A. Q.	ShEx. The subject is "Subpostmasters News Story", can you see that? Yes. It says: "Hi all "Vince has seen this news article and thought it was a good news story for the Post Office and good link to the Trust and Transparency work. Any suggestions on what we can do to take this forward? "Thanks "Anna." Was she one of your private secretaries? I don't remember there were a lot of private secretaries. I don't remember an Anna but I'm sure it was, yes. We can see the second highlight is the attachment, "Subpostmasters news story.pdf". Can we look at that, please. UKGI00019390.
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20	A. Q.	ShEx. The subject is "Subpostmasters News Story", can you see that? Yes. It says: "Hi all "Vince has seen this news article and thought it was a good news story for the Post Office and good link to the Trust and Transparency work. Any suggestions on what we can do to take this forward? "Thanks "Anna." Was she one of your private secretaries? I don't remember there were a lot of private secretaries. I don't remember an Anna but I'm sure it was, yes. We can see the second highlight is the attachment, "Subpostmasters news story.pdf". Can we look at that, please. UKGI00019390. You may recognise the style and font and text. It's
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	A. Q. A. Q.	ShEx. The subject is "Subpostmasters News Story", can you see that? Yes. It says: "Hi all "Vince has seen this news article and thought it was a good news story for the Post Office and good link to the Trust and Transparency work. Any suggestions on what we can do to take this forward? "Thanks "Anna." Was she one of your private secretaries? I don't remember there were a lot of private secretaries. I don't remember an Anna but I'm sure it was, yes. We can see the second highlight is the attachment, "Subpostmasters news story.pdf". Can we look at that, please. UKGI00019390. You may recognise the style and font and text. It's an extract from Private Eye.
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	A. Q. A. Q.	ShEx. The subject is "Subpostmasters News Story", can you see that? Yes. It says: "Hi all "Vince has seen this news article and thought it was a good news story for the Post Office and good link to the Trust and Transparency work. Any suggestions on what we can do to take this forward? "Thanks "Anna." Was she one of your private secretaries? I don't remember there were a lot of private secretaries. I don't remember an Anna but I'm sure it was, yes. We can see the second highlight is the attachment, "Subpostmasters news story.pdf". Can we look at that, please. UKGI00019390. You may recognise the style and font and text. It's an extract from Private Eye. Yes.
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1		letter from you to David Miliband and, if we just look
2		in the third paragraph:
3		"Nevertheless, in the light of discussions with
4		James Arbuthnot and number of MPs [Post Office]
5		recently agreed to an external independent review of
6		a small number of individual cases that had been raised
7		by them"
8		That's, I think, a reference, would you agree, to
9		the Second Sight investigation.
10	Α.	Yes.
11	Q.	So you signing this letter off in August 20
12	Α.	'12. As I said, I didn't sign it off.
13	Q.	No, so you simply would never have seen this?
14	Α.	Almost certainly.
15	Q.	Didn't see the letter in; didn't see the letter out?
16	Α.	Almost certainly not.
17	Q.	So we can't take this as knowledge by you of Second
18		Sight at this time?
19	Α.	No, absolutely not.
20	Q.	Can we look, please, then, at UKGI00019389, and look at
21		the bottom of the page, please, and over to the second
22		page. Can you see an email dated 22 July 2013 from
23		"Cable MPST"; is that your private office's email
24		address?
25	Α.	Yes, it is, yes.
25	Α.	Yes, it is, yes. 38
25	Α.	
25 1	Α.	38 shortfalls that hoe up on the Post Office's [Horizon
1 2	Α.	38 shortfalls that hoe up on the Post Office's [Horizon system].
1 2 3	Α.	38 shortfalls that hoe up on the Post Office's [Horizon system]. "The Interim Report of a review of the IT system,
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1 2 3	Α.	38 shortfalls that hoe up on the Post Office's [Horizon system]. "The Interim Report of a review of the IT system, following a campaign by Tory MP James Arbuthnot, sets out a raft of failings. These include the brutal way
1 2 3 4 5 6	Α.	38 shortfalls that hoe up on the Post Office's [Horizon system]. "The Interim Report of a review of the IT system, following a campaign by Tory MP James Arbuthnot, sets out a raft of failings. These include the brutal way the Post Office investigated financial errors;
1 2 3 4 5 6 7	Α.	38 shortfalls that hoe up on the Post Office's [Horizon system]. "The Interim Report of a review of the IT system, following a campaign by Tory MP James Arbuthnot, sets out a raft of failings. These include the brutal way the Post Office investigated financial errors; unreliable hardware; the absence of training or support
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1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20	Α.	38 shortfalls that hoe up on the Post Office's [Horizon system]. "The Interim Report of a review of the IT system, following a campaign by Tory MP James Arbuthnot, sets out a raft of failings. These include the brutal way the Post Office investigated financial errors; unreliable hardware; the absence of training or support for subpostmasters on a system said to be more complex than that at a high street bank; and an unfair business model which automatically makes subpostmasters responsible for any discrepancy. "These failings have led to false accounting prosecutions as inexperienced individuals with unexplained discrepancies have been faced with either reporting false figures or losing their business, with nowhere else to turn. "Arbuthnot has applauded the Post Office on the open way in which, through the review, it has allowed the flaws to be exposed. But the next big test is whether scores of people who have lost their livelihoods and
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24 A. Well, I had seen it, yes.
25 Q. What's the difference between seeing and reading? 40

23

the article?

The Post Office Ho

1	Α.	Well, the difference is I was given every morning a pack
2		of 30 or 40 press cuttings, everything relating to the
3		Department, and I would normally judge from the gist of
4		it, the headlines, whether this was something we in the
5		Department needed to react to in some way. Part of my
6		was job to be conscious of the public impact of what we
7		were doing, and I just glanced and this one and it did
8		refer to the brutal way the Post Office investigate, and
9		I thought you know, "Well, this chimes with what
10		I know", and I
11	Q.	Do you recall now only glancing at it?
12	Α.	Yes, I'm sure I only glanced at it. I only glanced at
13		almost all of the press cuttings. It wasn't
14		an important part of the day's routine; it was just
15		picking up important issues. I just noticed that I'd
16		been lecturing businesses on how they needed to be much
17		more transparent about how they dealt with consumers and
18		workers, and so on, and here was somebody who had been
19		a critic of the Government saying that, actually,
20		a Government agency under our remit was doing a good
21		job. So I thought "Oh, yeah, why don't we make more of
22		this?"
23		And, as you see from the private office response,
24		they were at pains to dampen my enthusiasm because they
25		realised that this was a complex issue, so I think we
		41
1		reply. So again, it's from Anna Bartholomew, a private
2		secretary in your office, so she's essentially replying
3		to her own email with the same distribution list. She
4		says:
5		"I have spoken to officials working on [Post Office]
6		and compiled the following advice for [you] this will
7		go in the box tonight with the article.
8		"Officials recommend not following up on the
9		article it presents a very skewed picture and does
10		not cover all the facts.
11		"The Interim Report clearly said that there was no
12		evidence of systemic failures or flaws, whereas the
13		report suggests [Post Office] has admitted to system
14		errors. There were 2 minor discrepancies which [Post
15		Office] identified and rectified independently of the
16		report. This affected a very small [proportion] of the
17		network no subpostmasters lost money
18		"Arbuthnot is closely involved in the investigation,
19		and provided a chance for the submission of individual
20		cases Although the article correctly refers to [him]
21		applauding the Post Office on the open way it responded
22		to allegations, there remain significant differences in
23		opinion. Following publication on the Interim Report
24		[he's] tabled an Urgent Question requiring a Government
25		statement despite conversations with Jo Swinson to
		43

orizon	IT Inq	uiry 25 July 2024
1		simply moved on and I didn't take it any further.
2	Q.	We'll come to all of those steps in a moment. You'll
3		see the article says that the Interim Report, which is
4		a reference to the 8 July 2013 Second Sight Report, sets
5		out a raft of failings: the brutal way Post Office
6		investigated errors; unreliable hardware; the absence of
7		training or support; an unfair business model leading to
8		false accounting prosecutions, leading to people losing
9		their business with nowhere else to turn. Why did you
10)	think this was a good news story?
11	Α.	Well, I thought it was a good news story because I'd
12	2	simply picked up the fact that, I think it says
13	5	Mr Arbuthnot applauded the Post Office on the open way
14		in which it allows these flaws to be exposed. I mean,
15	5	as I say, I didn't read it carefully. It wasn't
16	5	a policy document; it was just one of 30 press cuttings
17	,	that I'd glanced at, but I'd picked up that somebody was
18	5	saying something positive about the Department and the
19)	agencies we're responsible for.
20)	Most of the press coverage was negative. I mean,
21		that's the way you know, the way of Government and
22	2	here, at a quick glance, was something positive. So
23	5	I suggested to the Press Office maybe they should take
24		this a bit further.
25	6 Q.	Looking back at the email, please, UKGI00019389, see the 42
1		explain the operational nature of the issue.
2		"With regards to the possibility of redress, it must
3		be remembered that prosecutions were subject to the
4		judicial process. There is no automatic redress and
5		nothing the Government should or could intervene on.
6		Additionally, number of the subpostmasters pleaded
7		guilty.
8		" this is only an interim report."
9		So, essentially, pouring cold water of a different
10		kind or a different variety in a number of ways on your
11		idea to take forwards what you had read?
12		Yes, it was. Obviously.
13		Are you able to recall whether that's what happened?
14		No, I don't recall this episode at all but it we'd
15		had this kind of discussion constantly about the kind of
16	i	public relations/communications issue, about how to deal

- 17 with them, and I had got the point fairly quickly that
- 18 this was something the Press Office and the officials
- 19 didn't want to make something of. So I'd deferred to
- 20 their judgement on public relations grounds.
- I certainly didn't study the content of this minute in 21 22 any detail.
- 23 **Q.** What about studying the reports, "Can I see the report, 24 there's obviously a difference of view here"?
- 25 A. Well, I could have done but I think it didn't ring 44

1	a bell at the time that this was an issue. As I say, it
0	was bush . I was forward an a different supplier

- was just -- I was focusing on a different question, 2
- 3 which is the fact that the Government and Government
- 4 agencies were being more transparent, and I thought that
- 5 was the theme of the issue, rather than getting into
- 6 a debate about what the Government was actually doing in
- 7 relation to Second Sight. So I saw it entirely as
- 8 a rather simple one-line PR issue, and I was warned off
- 9 it and -- as I often was, and took no further action on it.
- 10

1

- Would you expect to have been provided with a copy of 11 Q. the report by your officials? 12
- 13 Not necessarily. Independently of this press issue, it Α.
- 14 was proceeding under the overall oversight of the Post
- 15 Minister. I'd no reason to believe that it wasn't being
- 16 well handled by her and, indeed, it was being well
- 17 handled. So I didn't need to see the report and nobody 18 suggested that I read it.
- 19 Q. Would you expect to be provided with an impartial and 20 objective summary of the report?
- 21 Not necessarily, depending on whether it was potentially Α. 22 controversial and might lead to difficult decisions but
- 23 this was -- I think it goes back to the earlier part of
- 24 our exchange, that this was a very small part of my
- 25 portfolio, I left it to the discretion of my private

45

(A short break)

- 2 (11.11 am) 3 MR BEER: Good morning, sir, can you continue to see and 4 hear us? 5 SIR WYN WILLIAMS: Yes, thank you. 6 MR BEER: Thank you. 7 Sir Vince in your witness statement you tell us in 8 paragraphs 61, 68, 69, 76 and 77 about some letters that 9 you received from James Arbuthnot MP and Adrian Bailey MP --10 **A.** Mm. 11 Q. -- on 11 and 17 March 2015. I'd like to just look at 12 13 those, please, and see what happened in relation to 14 them? A. Sure, yeah. 15 Q. These are about the Second Sight investigations and the 16 Mediation Scheme and a report that they were publishing 17 or providing. Can we look, please, at the first letter 18 19 in, UKGI00003781. Can we see this is from James Arbuthnot, it is dated 11 March 2015, to you. Scroll 20 21 down, please, he says: 22 "In [PMQs] today the Prime Minister told me that he 23 would ask you to write to me about the Post Office 24 Mediation Scheme. While there are many things that are 25 very worrying about it, what particularly concerns me is
 - 47

- 1 office and my ministerial colleagues to decide what was
- 2 sufficiently important to bring to me, and they clearly
- 3 judged that this wasn't necessary.
- 4 Q. You had, it seems, seen or read the Private Eye article
- and realised that it raised an issue of substance? 5
- 6 Α. Well, I'd seen the Private Eye article. I didn't 7
 - realise that it had raised an issue of substance, no.
- 8 Q. Why did you not realise that it raised an issue of 9 substance?
- 10 A. Well, because I'd probably glanced at it in two or three 11 seconds. That was the way we -- you know, I had to deal
- with press cuttings. As I say, it was a very rapid 12
- 13 exercise, took ten minutes in the morning and I would
- 14 just pick up, usually from headlines, what were the
- 15 issues in the news that I needed to be abreast of.
- 16 Q. Is that why you focused on it being a good news story,
- 17 rather than all of the parts of the article --
- 18 Yes, exactly right. Α.
- 19 Q. -- which point in the other direction?
- 20 A. Yes, exactly.
- 21 MR BEER: Sir, it's 11.00 now. I wonder if we might take 22 the first morning break until 11.10.
- 23 SIR WYN WILLIAMS: Yes, of course.
- 24 MR BEER: Thank you very much.
- 25 (11.00 am)

1	that the Post Office has recently been refusing to give
2	to Second Sight the documents and information that
3	Second Sight feel they need in order to determine
4	whether a miscarriage of justice has occurred.
5	I believe that the only legal folder, for example, that
6	Second Sight has seen is that relating to my constituent
7	Jo Hamilton but that folder did show that there was
8	no evidence (as the Post Office knew at the time) of
9	theft. Yet the Post Office charged her with theft. And
10	as a result she then pleaded guilty to false accounting,
11	having untruthfully been told that she was the only
12	person going through these difficulties.
13	"That suggests to me that there is more disclosure
14	of documents that needs to take place and that our
15	constituents will never believe that the truth has been
16	reached without that disclosure. Equally, that
17	disclosure needs to be made to Second Sight, who have
18	now built up the expertise to deal with it."
19	If we look at the letter in from Mr Bailey,
20	POL00176637, page 3 and 4, please. If we just pan out,
21	17 March 2015, to you.
22	"Dear Secretary of State,
23	"As you will be aware, on 3 February the [BIS]
24	Committee heard evidence on the Post Office Mediation
25	Scheme. During this session, we were concerned to hear 48

deferential, respectful, to the senior gentleman, but I think more a substance that I'd read the letter and I realised that it entirely hinged on accepting the view

And I said "Well, are the postmasters happy with this? I mean, that whole Mediation Scheme was for their benefit, so do they accept it?" And so I said "I want you to go" -- I asked the officials, who clearly wanted me to sign this in a hurry, because we were almost at the end of the Parliament, I said, "Look, I want to be satisfied that the postmasters share the view of the

So I declined to sign the letter until I had been

Just on that point, you said that the reason for you not following your advice was that the draft that had been supplied to you depended on the accuracy entirely of

A number of the earlier letters that had gone out also depended entirely upon the accuracy of what the Post Office was saying. What differentiated this occasion for you to say, "Hold on, I'm not signing that draft"? Well, the difference -- I'm not sure that I did commit myself in quite the same way earlier but, anyway, what's 50

Prime Minister regarding the Post Office Mediation Scheme on Wednesday last week, and your subsequent

"I appreciate you raising your concerns about the Mediation Scheme in general, but particularly regarding your constituent Mrs Jo Hamilton, who I understand has a case in the scheme. I must first of all reiterate

that the Mediation Scheme is independent of Government, and decisions relating to the scheme or its operation are matters for the parties involved and not for the

Then if we go over the page, please, if you look at the penultimate paragraph at the foot of the page, you

"... I note, through Second Sight's Report and the subsequent investigations, there is no evidence of system-wide problems with Horizon and that conclusion

investigation. As such, the priority must be to ensure that those applicants remaining in the scheme can have their cases considered swiftly and fairly, and I am hopeful that all parties will continue to work constructively to ensure this can happen."

52

That sentence, "there is no evidence of system-wide problems with Horizon and that conclusion has stood term

has stood firm through nearly two years of

of the Post Office.

Post Office about this question".

that which the Post Office was saying.

given evidence on that point.

Yes. and I --

letter

Government."

conclude by saying:

1		that the Mediation Scheme was not operating in the	1
2		matter envisaged when it was established.	2
3		"I was pleased to hear that since our evidence	3
4		session Post Office has agreed to take most cases	4
5		forward to mediation. However, I have a number of	5
6		specific concerns regarding Post Office's approach to	6
7		the mediation process, which I expect the Government to	7
8		be actively involved in addressing in order to ensure	8
9		they do not cause further issues in the future."	9
10		Then Mr Bailey lists them. I'm not going to go	10
11		through them.	11
12		You tell us in your witness statement that you	12
13		replied to both letters, indicating that you had read	13
14		both letters, and that your response is in detail, and	14
15		that you did not accept your private office's advice	15 Q .
16		that you should approve the revised draft of the letters	16
17		out without reading them. Correct?	17
18	Α.	Yes, that's correct. I only became aware of these when	18
19		I was asked to sign an outgoing letter and, of course,	19 A .
20		they are different sources one is Mr Arbuthnot and	20 Q .
21		the other is the Select Committee but, in my mind,	21
22		they were dealing essentially with the same set of	22
23		issues. And I got a draft letter from officials, and	23
24		I wasn't happy with it. It was partly, I think,	24 A .
25		stylistic. I thought we should be a little bit more	25
		49	
1		happened here was that I realised that there's something	1
2		really rather important and bad going on because it	2
3		isn't just a campaigning MP, this is the Select	3
4		Committee, who were there to have oversight of what	4
5		I did, being very critical of the Department.	5
6		So I needed to really concentrate on the issue and	6
7		think about it, and I think it was only in March 2015	7
8		I realised there was some really something really	8
9		seriously bad going on. It was actually quite	9
10		difficult. I mean, I remember this period quite clearly	10
11		because I was in the middle of a crisis, the last big	11
12		crisis of my period in office, when I was having to	12
13		decide about the export of weapons to Saudi Arabia that	13
14		were being used to bomb civilians, and I was keeping	14
15		awake at night because either I'd have blood on my hands	15
16		or I'd make a decision that would put large numbers of	16
17		British workers out of work, so I was totally	17
18		preoccupied with that problem.	18
19		And in the middle of it, I was being asked to sign	19
20		letters about this Mediation Scheme. So I needed time	20
21		to think about it and I refused to sign the first draft,	21
22		for the reasons I've just given you.	22
23	Q.	Can we look at the draft you did sign, UKGI00003910.	23
24		This the letter back to James Arbuthnot, dated 17 March:	24
25		"I am writing to you further to your question to the	25

(13) Pages 49 - 52

	through nearly two years of investigation", was that	1	Α.	My second interaction had been when a representative	
	a suggestion put to you by officials?	2		I'm not sure who it was, whether it was Mr Thomson or	
Α.		3		a regional head had come to see me about individual	
	really for the first time, I wanted reassurance from the	4		cases, and I had met Mr Thomson. I think on couple of	
	postmasters that that was indeed the case, and I had	5		occasions he had come to talk about the progress of the	
	asked the officials to check with the Federation whether	6		Transformation Programme and the progress we were making	
	this was indeed their understanding, and I was told that	7		on mutualisation. So that was my extent of my dealings	
	it was and that the General Secretary or the head of the	8		with the union	
	union had appeared before the Select Committee and has	9	Q.	That he, in your dealings with him, ever struck you as	
	said he was satisfied that there was no problem.	10		a tool meaning a tool of the Post Office?	
	So I was now being told by the officials, the Post	11	Α.	Absolutely not. All my dealings with the Federation and	
	Office and the union that there wasn't a problem, so it	12		him personally, they'd struck me as people of high	
	seemed to me perfectly reasonable for me to accept that	13		integrity, who believed in what they were doing, as	
	collective view.	14		trade union officials do. I had no reason to doubt	
Q.	Was that, in your mind, the critical turning point: the	15		their integrity whatever.	
	views expressed by, I think, the General Secretary of	16	Q.	Do you not need to see Second Sight's Report in order to	
	the NFSP?	17		include a sentence or sentences such as these in the	
Α.	Yes, it was. I had dealt with them before	18		letter?	
Q.	Had you dealt with him?	19	Α.	Well, I think, given time, I probably would have done	
Α.	Not with him. Well, he'd met me, I think, on a couple	20		and should have done but I think the context was that	
	of courtesy calls	21		we, within a day or so of the end of Parliament, I was	
Q.	Sorry, just to make clear, who are you referring to?	22		being pressed by the officials to get this letter out,	
Α.	Sorry, my first dealings with the Federation, 15 years	23		I think even when I was given the reassurance about the	
	earlier, had been with Mr Baker.	24		Federation's view, I declined still to sign it, because	
Q.	Colin Baker, yes.	25		I had the I was beginning to smell a rat. I mean,	
	53			54	
	there was something going on here and had I had	1		do, to influence outcomes?	
	there was something going on here and had I had Parliament continued or had I been returned to office,	1 2	А.	do, to influence outcomes? No, I think that wasn't the part of the letter that	
			A.	-	
	Parliament continued or had I been returned to office,	2	A.	No, I think that wasn't the part of the letter that	
	Parliament continued or had I been returned to office, I would have got all these people around the table	2 3	A.	No, I think that wasn't the part of the letter that I was focusing on. It was the implication that the	
	Parliament continued or had I been returned to office, I would have got all these people around the table the Select Committee, Mr Arbuthnot, the Post Office	2 3 4	A.	No, I think that wasn't the part of the letter that I was focusing on. It was the implication that the Horizon scheme was or wasn't functioning properly.	
	Parliament continued or had I been returned to office, I would have got all these people around the table the Select Committee, Mr Arbuthnot, the Post Office people and, for the first time, Mr Bates, I'd not heard	2 3 4 5	А.	No, I think that wasn't the part of the letter that I was focusing on. It was the implication that the Horizon scheme was or wasn't functioning properly. I wasn't as explained to you before the break,	
	Parliament continued or had I been returned to office, I would have got all these people around the table the Select Committee, Mr Arbuthnot, the Post Office people and, for the first time, Mr Bates, I'd not heard of him until this point and I'd have got them all	2 3 4 5 6	Α.	No, I think that wasn't the part of the letter that I was focusing on. It was the implication that the Horizon scheme was or wasn't functioning properly. I wasn't as explained to you before the break, I hadn't been given any briefing about the Second Sight	
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(14) Pages 53 - 56

1		every working day."	1	Α.	Of course it matters, it matters immensely, and enormous
2		Is that a line, a comparison, of the said to be	2		harm was done. I think the problem, as I was just
3		small number of cases where individuals were raising a problem versus the number of users and the number of	3 4		trying to explain, for policymakers, is who who don't understand anything about computers and computer
4 5		transactions that was put to you by officials as	4 5		
6		an important point?	5 6		systems, is how it is that they seem to work almost all the time but not all the time.
7	۸	Yes, it almost certainly was. I mean, I it's	7		It's a concept here that I still struggle to get my
8	А.	an issue that troubles me, and I'm sure the Inquiry to	8		head around, why this was the case.
9		this day, about those of us who don't really	9	Q.	We've received a lot of evidence on precisely that issue
10		understand computers and computer system, is why it	10	ч.	and the Inquiry understand how that occurs, concerning
11		works almost all the time, but in some cases not, with	10		code regression and the combination of a set or a series
12		disastrous consequences. I mean, it needed somebody,	12		of circumstances which, when they interact with each
13		I think, to explain why	13		other, can lead to undesirable outcomes?
14	Q.	Did anyone ever explore that with you or	14	Α.	Well, indeed, and I've read about that. But it would
15	<u>а</u> .	No, I wish they had. I wish they had	15	7.1	have been helpful, when I was in Government, for
16		and suggest that it doesn't really matter if there's	16		somebody to have explained how that was possible.
17		a large number of okay transactions because if	17		I believe the Computer Weekly people had some insight
18	Α.	No, clearly	18		into it but I went aware of their existence. And
19	Q.	-	19		Mr Bates too, it was only then, March 2015, I was aware
20	Α.	-	20		of his existence and he may have been able to explain
21	Q.	If you're the person that has been sent to prison whilst	21		that.
22		pregnant, if you're the person who has committed	22	Q.	Can we turn, please, to POL00153177, and page 15,
23		suicide, if you're the person who has been made	23		please. It's the top two paragraphs. We don't actually
24		bankrupt, it doesn't matter that quite a few other	24		have the Computer Weekly article that's here quoted and
25		people have been getting on fine with the computer?	25		so I'm using this as a source of the information. This
		57			58
1		briefing note says, in the top paragraph, that:	1		the whole point of what I was telling you: I only agreed
2		"James Arbuthnot has been the most vocal of	2		to support the official line on this when I was
3		a group of 140 MPs campaigning for redress	3		reassured that the people who represented the
4		"Speaking to Computer Weekly this week, [he]	4		postmasters were content. It wasn't based on
5		expressed disappointment that a written answer to his	5		an acceptance of the Post Office view at all. I would
6		question during Prime Minister's Questions on 11 March,	6		never have signed it if that was all I was asked to do.
7		which subsequently came from [you], followed the Post	7		And I would just add a point, which I think we did
8		Office's line closely.	8		discuss briefly before, that what is strange about this
9		"In response to the written answer to his question,	9		whole episode is that none of these 140 MPs ever came to
10		written by [you], Arbuthnot told Computer Weekly: 'The	10		talk to me about it. I had some of them coming to talk
11		Secretary of State has chosen to listen carefully to his	11		to me in my the privacy of my House of Commons office
12		advisers and the Post Office on this matter rather than	12		about Post Office issues, like the last bank in town,
13		seeking to understand why over 140 of his fellow MPs	13		where the Post Office were not being very proactive.
14 15		have outstanding cases and unresolved concerns about the	14 15		Nobody came to talk to me about the Post Office and, for
15 16		matter. This is a shame. I remain quietly confident that the truth will be revealed in due course and	15 16		example, the Chairman of the Select Committee, who
17		I intend to pursue this matter until that happens."	10		I knew very well and respected, he was a very good Parliamentarian, had actually come to see me a few weeks
18			17		-
19		Do you agree that 140 outstanding cases or 140 MPs	18		before this episode and all he wanted to talk to me
20		having outstanding cases represented a significant number?	19 20		about was about the pub legislation, and never raised
20	۸		20		the issue about postmasters. So I think I could be
21	A. Q.	Yes, it is. It's appalling. Was Mr Arbuthnot's statement that you had listened to	21		forgiven for not understanding the weight of this 140 MP campaign because none of them ever talked to me about
22	ω.	the Post Office and had not sought to understand why 140	22		it.
23 24		of fellow MPs have outstanding cases accurate?	23 24	Q.	He wrote you a detailed letter setting out his and the
24 25	Α.	No, I hadn't just listened to the Post Office. That's	24 25	ч х .	committee's concerns
20	д.	59	20		60

	that.
Q.	Can we turn, please, to POL00153177, and page 15, please. It's the top two paragraphs. We don't actually have the Computer Weekly article that's here quoted and so I'm using this as a source of the information. This 58
	the whole point of what I was telling you: I only agreed to support the official line on this when I was reassured that the people who represented the postmasters were content. It wasn't based on an acceptance of the Post Office view at all. I would never have signed it if that was all I was asked to do. And I would just add a point, which I think we did discuss briefly before, that what is strange about this whole episode is that none of these 140 MPs ever came to talk to me about it. I had some of them coming to talk to me in my the privacy of my House of Commons office about Post Office issues, like the last bank in town, where the Post Office were not being very proactive. Nobody came to talk to me about the Post Office and, for example, the Chairman of the Select Committee, who I knew very well and respected, he was a very good Parliamentarian, had actually come to see me a few weeks before this episode and all he wanted to talk to me about was about the pub legislation, and never raised the issue about postmasters. So I think I could be forgiven for not understanding the weight of this 140 MP campaign because none of them ever talked to me about
_	it.
Q.	He wrote you a detailed letter setting out his and the committee's concerns

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decisions."

- 1 A. Yes, but I think --
- 2 Q. Was that not enough?
- 3 A. It certainly wasn't, no. I think all MPs realised that
- 4 writing polite letters to departments isn't necessarily
- 5 the way to get through to people at the top of
- 6 Government. You have to talk to them face-to-face.
- 7 Q. So you do blame them for failing to come and see you?
- 8 A. No, I'm not blaming them. As I say, different people
- 9 have different styles. Some people operated through the
- 10 formal processes of Parliament, others didn't. No, it's
- 11 not a question of blame. As I say I had a great --
- 12 having seen the mountain of work that they did, have
- 13 enormous respect for them but it was -- let's just say
- it was unfortunate that I never had any personal contactwith the MPs about this matter.
- 16 Q. Would the outcome have been different; is that what17 you're saying, Sir Vince?
- 18 A. Yes, I think it probably would have been.
- 19 Q. In what way?
- 20 A. Well, because I would have realised much earlier than
- 21 March 2015 that there were serious problems that were
- 22 not being properly addressed by the Post Office and the
- 23 Department, and I would have started to interrogate it
- 24 much more aggressively, as I did long quite a lot of
- 25 other issues where MPs came to see me.

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1		Can we look at that exchange, please, UKGI00004225,
2		and go to page 4, please. Email, 15 April, Laura
3		Thompson to, amongst others, your private office. Can
4		you see that?
5	Α.	Yes. Yes, I can.
6	Q.	"Hannah, Ashley
7		" we expect the next development in the Post
8		Office Horizon issue to happen tomorrow or possibly
9		Friday.
10		"Second Sight have completed their final report
11		into the matter. This report will be issued to all
12		remaining applicants later today
13		"Post Office advise that the report is poor,
14		containing unsubstantiated allegations and
15		misrepresentations they are issuing their own
16		response to the report alongside it.
17		"The report is designed to inform those applicants
18		in the scheme awaiting mediation. It is not designed to
19		be published once it is received by applicants
20		it will be leaked. Post Office anticipate this will
21		happen and are prepared to release the report in full,
22		alongside [its] response, to journalists on request
23		"[Post Office] will send a copy of the report and
24		their response to BIS later today This is in line
25		with the commitment that [you] made in [your] letter to 63

- Q. Don't you think you would have been provided with
- exactly the same Post Office lines by officials, and
- 3 they would have been sent out in the same way as we've4 seen?
- 5 A. I might well have been and it might well have led to the
 6 same conclusion but I would have been more alert to the
 7 challenge that was being made in Parliament.
- 8 Q. Can we go towards the end of this episode and look at
 9 paragraph 79 of your witness statement on page 33.
 10 Page 33, paragraph 79:
 - "On 15 April 2015, my Private Office was copied into
- 12 an email from Laura Thompson [a ShEx official] to the
- 13 BIS Communications Team concerning the imminent
- 14 publication of the Second Sight second report ... It
- 15 essentially said that the report was about to be
- published, [Post Office] considered it to be of poorquality and had prepared a response, that the report
- would be provided to BIS in line with my response to the
- 19 BIS Select Committee and that there may be some media
- 20 interest. My Private Office responded to say that [you]
- 21 had noted the [concerns] of the email and was grateful
- 22 for the update. By this time, Parliament had dissolved
- 23 and preparations were under way for the general
- 24 election. [You] were unable to take non-urgent

62

1 the BIS Select Committee last month. 2 "I understand from [Post Office] that, while the 3 report does not make any particularly new accusations, 4 it still contains criticism of [Post Office] and these 5 could be picked up by interested parties (probably Nick 6 Wallis from the One Show). However, it is important to 7 note that the report maintains the conclusion that there 8 are no systemic flaws in Horizon capable of causing the 9 issues that have been claimed." 10 Your office, I think, was told to direct all calls to Post Office and seek Post Office lines: is that 11 12 right? 13 Α. It appears so, yes. 14 Q. Would you have seen this email chain? A. I doubt it. It's possible. There was a great flurry of 15 activity, in the last few days of Parliament. I think 16 17 the judgement would have been that my sending those 18 letters to Mr Arbuthnot and the Select Committee was the end of my involvement but it's possible I was shown. 19 20 Q. So this being the last days of Parliament, or 21 a Parliament, it affected the extent of your 22 involvement? 23 A. Yes, and, indeed, the issue I referred to earlier around 24 Saudi Arabia was absorbing more and more of my time and I think my officials understood I had to focus on that. 25 64

1	Q.	Would anything be done in those circumstances to alert
2		the new Secretary of State, if there was going to be
3		a new Secretary of State, as to the issues that weren't
4		being addressed because of the ending of this
5		Parliament?
6	Α.	Well, I guess I was hoping I would be the new Secretary
7		of State and I would have an opportunity to deal with
8		this issue properly. I mean, I'd realised, as I'd just
9		said to you, that there was something bad happening.
10		I tried to respond to it as best I could. I think the
11		rational approach of an incoming Secretary of State who
12		I hoped would be me would be to get the various parties
13		together, including Mr Bates, who I'd heard of for the
14		first time, the critics of the Post Office in
15		Parliament, in order to thrash out why these
16		discrepancies in interpreting the work of the computer
17		and the mediation system had arisen.
18		I mean, it would part of my role as Secretary was
19		convening, and I think what I should have done and would
20		have done, had there been time, would have been to have
21		dealt with the matter in that way.
22	Q.	Thank you, that can come down.
23		You tell us in your witness statement, it's
24		paragraph 140, that the Post Office Board was, in
25		retrospect, clearly a failure:
		65
1		though it's fair to ask whether it's really for
1 2		though it's fair to ask whether it's really for a Secretary of State to be surfacing these issues or for
2		a Secretary of State to be surfacing these issues or for
2 3		a Secretary of State to be surfacing these issues or for the officials in ShEx, whose focus was the Post Office."
2 3 4		a Secretary of State to be surfacing these issues or for the officials in ShEx, whose focus was the Post Office." Firstly, can you tell us what the something wrong
2 3 4 5	А.	a Secretary of State to be surfacing these issues or for the officials in ShEx, whose focus was the Post Office." Firstly, can you tell us what the something wrong might be about two individuals, one the Chairman and the
2 3 4 5 6	А.	a Secretary of State to be surfacing these issues or for the officials in ShEx, whose focus was the Post Office." Firstly, can you tell us what the something wrong might be about two individuals, one the Chairman and the second a CEO, attending a meeting at the same time?
2 3 4 5 6 7	Α.	a Secretary of State to be surfacing these issues or for the officials in ShEx, whose focus was the Post Office." Firstly, can you tell us what the something wrong might be about two individuals, one the Chairman and the second a CEO, attending a meeting at the same time? Well, I suppose it's observations that have come from
2 3 4 5 6 7 8	А.	a Secretary of State to be surfacing these issues or for the officials in ShEx, whose focus was the Post Office." Firstly, can you tell us what the something wrong might be about two individuals, one the Chairman and the second a CEO, attending a meeting at the same time? Well, I suppose it's observations that have come from later years and now, since I've left politics, I'm
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2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20	A.	a Secretary of State to be surfacing these issues or for the officials in ShEx, whose focus was the Post Office." Firstly, can you tell us what the something wrong might be about two individuals, one the Chairman and the second a CEO, attending a meeting at the same time? Well, I suppose it's observations that have come from later years and now, since I've left politics, I'm involved in a Non-Executive Director role in companies and I'm directly confronted with this whole issue of Cadbury principles in business and the separation of roles of Chairs and Chief Executives. I probably hadn't appreciated at the time why that was important. The Chair and the Chief Executive, when they came to see me and I think it was only on two or three occasions on courtesy calls were a double act and, you know, in one sense, it's, you know, understandable that the Chair would want to give encouragement to the Chief Executive in delivering our big programme of transformation. That's understandable, but I think
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	Α.	a Secretary of State to be surfacing these issues or for the officials in ShEx, whose focus was the Post Office." Firstly, can you tell us what the something wrong might be about two individuals, one the Chairman and the second a CEO, attending a meeting at the same time? Well, I suppose it's observations that have come from later years and now, since I've left politics, I'm involved in a Non-Executive Director role in companies and I'm directly confronted with this whole issue of Cadbury principles in business and the separation of roles of Chairs and Chief Executives. I probably hadn't appreciated at the time why that was important. The Chair and the Chief Executive, when they came to see me and I think it was only on two or three occasions on courtesy calls were a double act and, you know, in one sense, it's, you know, understandable that the Chair would want to give encouragement to the Chief Executive in delivering our big programme of transformation. That's understandable, but I think I now appreciated, having had personal responsibility
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	A.	a Secretary of State to be surfacing these issues or for the officials in ShEx, whose focus was the Post Office." Firstly, can you tell us what the something wrong might be about two individuals, one the Chairman and the second a CEO, attending a meeting at the same time? Well, I suppose it's observations that have come from later years and now, since I've left politics, I'm involved in a Non-Executive Director role in companies and I'm directly confronted with this whole issue of Cadbury principles in business and the separation of roles of Chairs and Chief Executives. I probably hadn't appreciated at the time why that was important. The Chair and the Chief Executive, when they came to see me and I think it was only on two or three occasions on courtesy calls were a double act and, you know, in one sense, it's, you know, understandable that the Chair would want to give encouragement to the Chief Executive in delivering our big programme of transformation. That's understandable, but I think I now appreciated, having had personal responsibility for corporate governance, that there is a separation of

1		"I wish I had spent more time thinking about the
2		role and constitution of the Board and whether it was
3		doing its job properly."
4		Can you tell us in greater detail, please, what you
5		think you should have spent more time doing, concerning
6		the role and constitution of the Post Office Board?
7	Α.	Well, in retrospect we know that bad things were
, 8		happening in the Post Office and that the Board were the
9		people who would have surfaced any disquiet and reported
10		it back to ministers and, if necessary, me, and so there
11		was a failure at that level. As to what I could have
12		done about it, I think, as I said earlier, I was wanting
13		to change the institutional arrangement so that the
14		postmasters had a bigger voice and an easy way of doing
15		it would have been to have insisted that postmasters and
16		their representatives were put on the Board.
17		At the time, it hadn't occurred to me to do that but
18		I know it's now been done.
19	Q.	You tell us in paragraphs 141 and 142 of your witness
20		statement that:
21		"I should have also noticed that there was something
22		wrong about Paula Vennells and Alice Perkins attending
23		meetings together, where Alice Perkins was supposed to
24		be supervising and independently scrutinising the Post
25		Office's Executive Team's performance. On these issues,
		66
1		Post Office's senior management?
2	Α.	No, I didn't. I as I think I mentioned earlier,
3		I think at my first ever meeting with Paula Vennells,
4		I'd told her I didn't think much about Post Office
5		Management. I'd had very negative views about them and
6		I'd recommended, I think, that she should read my
7		Hansard report and think about it. But she had nothing
8		to do with that, she came much later and I certainly had
9		no reason to believe that she and her senior colleagues
10		were a problem.
11	Q.	Was it ever escalated to you that members of the Board,
12		individuals within ShEx, and some ministers, had
13		concerns about her competence and abilities?
14	Α.	No, it was never communicated to me.
15	Q.	Did the consistent complaints from subpostmasters that
16		were addressed to your Department not cause you to have
17		concerns about Post Office's management?
18	Α.	Well, I didn't know about the volume of them. As I say,
19		the one occasion I when an MP brought the Federation
		C C
20		to me, concerned, I think, 100 postmasters, which was
20 21		to me, concerned, I think, 100 postmasters, which was 1 per cent of the total, I think, something of that
20 21 22		to me, concerned, I think, 100 postmasters, which was 1 per cent of the total, I think, something of that order of magnitude. Indeed, I asked the question at the
20 21 22 23		to me, concerned, I think, 100 postmasters, which was 1 per cent of the total, I think, something of that order of magnitude. Indeed, I asked the question at the time, of my officials would they do some research, as to
20 21 22 23 24		to me, concerned, I think, 100 postmasters, which was 1 per cent of the total, I think, something of that order of magnitude. Indeed, I asked the question at the time, of my officials would they do some research, as to into whether a 1 per cent prosecution rate was abnormal
20 21 22 23		to me, concerned, I think, 100 postmasters, which was 1 per cent of the total, I think, something of that order of magnitude. Indeed, I asked the question at the time, of my officials would they do some research, as to

(17) Pages 65 - 68

1		so on, and ask if this is normal. And the message came
2		back to me that it was normal and there was nothing
3		worrisome about it.
4		So the fact is that my limited knowledge of
5		complaints didn't suggest to me that at that point, that
6		there was a failing at the top management.
7	Q.	Can we turn, lastly, to some reflections you make at the
8		ending of your witness statement it's page 51 and
9		paragraph 144. You say:
10		"[You] have naturally reflected on what lessons can
11		be learnt from the Post Office scandal. A few
12		thoughts", and you set out five of them:
13		"[First] The relationship between the Post Office
14		and postmasters was, and is, highly unequal. In
15		comparable situations [you] promoted legislation
16		establishing independent regulators to protect the
17		weaker [parties]."
18		You've mentioned that already:
19		"In the case of the Post Office, a different
20		approach was tried but for a variety of reasons it
21		did not work. In future an independent
22		regulator/arbitrator should be appointed."
23		Can you expand, please, on what you mean by
24		an independent regulator and arbitrator?
25	Α.	Well, I can't expand a great deal because it was a sort 69
		09
1		you: that I'd one of the things I'd done as
2		a minister was to set up these regulatory bodies for
3		industries where this was a common problem, which was
4		agriculture and supermarkets, and pubs and pubcos. In
5		introducing the legislation, it proved to be a lot more
6		complicated than I'd realised when I was putting the
7		idea out in general terms. But I think we should be
8		looking at those models and applying drawing on those
9 10	~	lessons to apply it in the case of the Post Office.
10 11	Q.	Over the page, please. WYN WILLIAMS: Before we go on, Mr Beer, can I just ask
12	SIR	WYN WILLIAMS: Before we go on, Mr Beer, can I just ask one question about the first subparagraph, just to clear
13		my mind.
13		Sir Vince, as you probably are aware, the Mediation
14		Scheme in 2013 to 2015 was just that, in the sense that
16		the parties, in effect, were free to choose whether to
17		accept what the mediator was trying to achieve. Does
18		your phrase "independent regulator/arbitrator" convey to
19		me that you think that there should be some kind of
20		scheme which, in effect, imposes a solution on the
21		postmasters and the Post Office, whether they like it or
22		not?

- 22 not?
- 23 A. No, that's exactly what I envisaged.
- 24 SIR WYN WILLIAMS: Fine. All right. Thank you. Yes.
- 25 **MR BEER:** Thank you, sir.

1		of concept and we actually, as we now know, the Second
2		Sight project led to a form of arbitration or dispute
3		settlement, which didn't work, once because the
4		details were wrong. So the concept was tried and didn't
5		work brilliantly well. But I think in the other cases
6		I had taken action, in respect of pubs and supermarkets,
7		a set-up had worked. The difference being that we were
8		dealing here with a state agency, and to have introduced
9		that kind of arrangement, I would have been asking to
10		set up an arrangement where the Government would have to
11		investigate complaints into Government, which would have
12		been a rather circular process. But I think the concept
13		of having an entirely independent arbitration process is
14		right, though, of course, the details also need to be
15		right.
16	Q.	You say, secondly:
17		"A related point is that UK competition law is
18		forced on distortion of competition resulting in
19		detrimental impacts on consumers. It does not address
20		market imbalances between large corporations and smaller
21		subcontractors or [franchises]. Consideration should be
22		given to addressing this."
23		Can you expand, please, on what you have in mind
24		there?
25	Α.	Well, I think the answer is the one I've just given to
		70
1		Over the page to 3, please. You say:
2		"The experience of Horizon has been that Post Office
2		Management, government officials and ministers did not
4		understand the workings and limitations of complex,
4 5		advanced computer systems. There have been many other
J		auvanceu computer systems. There have been hidly olher

- failures (as in the NHS). There is a case for
- Government Departments and entities like the Post Office
- to have a Board-level Technology Officer who is legally
- responsible for validating the integrity of technology
- 10 systems in the same way that the Permanent Secretary is
- 11 Accounting Officer and company Chief Finance Officers
- 12 are responsible for accounts."

6

7

8 9

16

- 13 "Legally responsible", do you mean through14 legislation?
- 15 A. Yes. Not that the individual would be subject to
 - prosecution, no; indeed, through legislation. I mean,
 - I was just attracted to this idea because of the
- 18 experience I had with the Permanent Secretary, who was
- 19 the Accounting Officer for BIS, and, if there was
- 20 something wrong in the accounts of the Department, he
- 21 would be hauled up before the Parliamentary Public
- 22 Accounts Committee. So there was a real accountability
- 23 here. There is analogous behaviour in the private
- 24 sector, obviously, with due diligence, and I thought,
- 25 since very few people in public life have any 72

1	understanding of computers and systems, there needed to	1	A
2	be somebody who was properly qualified/knowledgeable,	2	
3	who would take that level of responsibility, because,	3	Q
4	I mean, some companies and Government departments, stand	4	Α
5	or fall by whether their technology is working, and so	5	
6	having a specific line of accountability would, in my	6	
7	view, be useful.	7	
3 C	5	8	
9	"There appears to have been a failure of governance	9	
0	in as much as the Board failed to identify a serious	10	
1	failure and alert ministers to it When government	11	
2	appoints members of supervisory boards of this kind it	12	
3	is important that members are aware that their primary	13	
4	duty is to protect the wider public interest. This may	14	
5	involve creating a bespoke corporate structure with	15	_
6	specific legislative underpinning."	16	Q
7	A couple of questions on that: you say that when the	17	
8	government appoints members to a board it is important	18	
9	that that member is aware that their primary duty is to	19	Α
20	protect the wider public interest?	20	
1 A		21	_
2 C		22	Q
3	was the members' duty?	23	
4 A	•	24	
5 C	. Implicit how? I'm so sorry. 73	25	
		4	
1 A 2	. Well, because he was there to represent the Government	1	~
	and the Government represents the public interest. As	2	Q
3 1	I say, we can debate the different components of public	3	
	interest but he was the Government the Government was	4	
	the shareholder, he was there to represent the	5	
	Government and the Government, if it in a democracy,	6	
	is there to represent the wider public interest.	7	
		8 9	
A 0		9 10	
	in this note, we should have been, and should be thinking a little bit more about the composition of the	10	
1	board.	11	
2 3 C		12	
3 G 4	" involve creating a bespoke corporate structure.	13	•
5	5 1 1 2	14	A
6	with specific legislative underpinning." Do you have this idea in mind in relation to the	15	
7	-	10	
	whole range of public corporations in which the		
8	Government is a shareholder?	18	
9 A		19	
0	from the private sector, sometimes you have two-tier	20	
21	boards, which is necessary to capture the variety of	21	
	stakeholder interest. I mean, when we talk about public	22	
22		23	
22 23	corporations, we're talking about some very	~ 4	
22 23 24 25	corporations, we re taiking about some very controversial bodies, like the BBC, and so the word "bespoke" is to take account of the fact that these are	24 25	

A 1	۱.	In this case,	of course,	the there	e was a	Government
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- representative on the Board --
- 3 **Q.** Yes.
- A. -- but he or she was, I think, probably looking in terms
- of the public interest, in terms of spending £2 billion
- 6 of taxpayer's money and making sure it was properly and
- 7 effectively spent, but there were other public
- 3 obligations, the welfare of postmasters being one of
- 9 them, and it was quite difficult for, you know, one
- 0 shareholder representative to carry out different,
- 1 possibly on occasions conflicting, aspects of public
- interest.
- 13So I think we probably hadn't thought through how14these different aspects of public interest were best
- 15 captured in the composition of the Board.
- 16 **Q.** So the first question, your answer to the first question
- 17 is you think it was established that Mr Callard's
- 18 primary duty was to protect the wider public interest?
- A. Yes, I think so. We can debate, you know, academically
 about what public interest was but, yes, I think that
 was clearly the case.
- Q. Why do you think that was clearly established, that hisduty was to protect the wider public interest, rather
- than to be -- to hold and discharge the duties that any
 - other Board member held? 74

1		very different animals and require different treatment.
2	Q.	Fifth, lastly:
3		"There will need to be a review of the precise role
4		of Government in relation to [ALBs] as in the status of
5		Public Corporation under the 1969 Act. There is no
6		appetite at any level for politicians to be micro
7		managing organisations, like the Post Office (or
8		hospitals, colleges and government laboratories). But
9		an explicit mandate to deal with failing organisations
10		(as with schools, NHS Trusts and police forces) might be
11		helpful."
12		Can you explain what you mean by an "explicit
13		mandate"?
14	Α.	Well, the question I'm addressing here is one that runs,
15		I think, through the heart of this Inquiry: which is
16		this whole question of the distinction between
17		operational questions and strategic questions and where
18		you draw the line. And I think, in general, it is
19		sensible policy that agencies of Government should not
20		be micromanaged from the centre, whether they're schools
21		or public corporations.
22		But that does require some mechanism to ensure that,
23		when they go very badly wrong, there is an opportunity
24		for Government, the Minister sitting behind them, to
25		interfere, and I think this has been thought through in

The Post Office Horizon

1	the case of schools and hospitals. It is clear that in	1
2	this case there wasn't a kind of emergency mechanism,	2
3	where probably my successors would have been able to	3
4	move in very quickly and take over the organisation,	4
5	appoint new management and start from scratch.	5
6 7	Q. In colloquial language, special measures	6
7	A. Special measures.	7
8 9	Q type enterprises?A. Yes.	8 9
9 10		9 10
10	MR BEER: Sir Vince, those are my questions. Thank you for answering them.	10
12	A. Thank you.	12
13	MR BEER: There will be some questions from Core	12
14	Participants. May I suggest we have our second break	13
15	now until 12.10. There are about 45 minutes' of	15
6	questions, sir, which will take us to the lunch break.	16
7	SIR WYN WILLIAMS: All right. Thank you very much. 12.10.	10
18	MR BEER: Thank you very much.	18
9	THE WITNESS: Thank you.	19
20	(11.57 am)	20
21	(A short break)	21
22	(12.10 pm)	22
23	MR BEER: Sir, before the Core Participants ask their	23
24	questions, there's one matter that I'd omitted to ask on	24
5	behalf of a Core Participant, so I ought to do that	25
	77	
1	the assertion that any officials in ShEx were lied to by	1
2	their counterparts in the Post Office?	2
3	A. No, nothing specific. I've been trying to follow the	3
4	Inquiry at some distance and that is the kind of	4
5	language and interpretation that I've heard, and you've	5
6	given you've taken evidence from Ed Davey, who	6
7	certainly felt very strongly that he had been very	7
8	seriously misinformed or lied to, he wasn't clear which,	8
9	and that matters might have been addressed if that	9
0	information had been given to him.	10
1	Q. Are you able to assist the Inquiry from your own	11
12	knowledge, rather than having watched the Inquiry	12
13	proceedings, as to the identity of any individual within	13
4	ShEx who was lied to by their counterpart	14
15	A. No, I certainly can't do that. ShEx were one of many	15
6	departments within the BIS. As far as I was concerned,	16
17	they were just part of the BIS Civil Service. We had,	17
8	I think, 3,000 to 4,000 civil servants and I had no	18
9	particular reason to reflect on who ShEx were in this	19
20	context and who the individual civil servants were or,	20
21	indeed, their relationships with the Post Office.	21
22	MR BEER: Thank you very much.	22
23	Sir, those are the supplemental questions. I think	23
24	it's Ms Patrick first and then Ms Page and then	24
25	Mr Jacobs.	25
	79	

דו ו	Inq	uiry 25 July 2024
1		first. It'll only take a couple of minutes.
2		WYN WILLIAMS: Certainly.
3	MR	BEER: Thank you, sir. Can we turn up paragraph 90 of
4		your witness statement, please. It's on page 36. About
5		five lines from the bottom, you say:
6		"It was clear that in my period in office the
7		operational failures were sufficiently widespread and
В		serious as to justify Government intervention. But
9		these were not identified or recognised within the
0		Government. The reason, so far as I can tell, was that
1		officials in ShEx were misinformed or lied to by their
2		counterparts in the Post Office."
3		Then similarly page 41, at the foot of the page,
4		paragraph 110, two lines from the bottom:
5		"It is clear that in my period in office the
6		operational failures were not identified or recognised
7		as systemic, or engaging strategy. The reason, so far
8		as I can tell, was that officials in ShEx were
9		misinformed or lied to by their counterparts in the Post
0		Office."
1		Firstly, would you agree that there is a distinction
2		between ShEx misinforming, on the one hand, or lying to,
3		on the other, their counterparts in the Post Office?
4	Α.	Yes, indeed. There is an important distinction, yes.
5	Q.	Are you able to assist the Inquiry as to the basis for
		78
1		Questioned by MS PATRICK
2	MS	PATRICK: Sir Vince, good afternoon. My name is Angela
3		Patrick and I represent, together with Mr Moloney KC and
4		Hudgells Solicitors, a number of subpostmasters who were
5		convicted and have since had their convictions quashed,
6		including Mrs Hamilton, who I'm sure you can see sitting
7		to my right.
В	Α.	Yes.
9	Q.	You'll be glad to hear I've got one issue I want to
0		cover with you in questions and it's looking back at
1		your witness statement. At paragraphs 117 to 118 you
2		deal with your knowledge and experience on the
3		backbenches before you came to Government, and you've
4		dealt win that a little with Mr Beer this morning.
5		I just want to look again at paragraph 118, if we could,
6		and if that could be brought up for you, I'd be

grateful. It's WITN10830100, and it's page 44 at the

"From 1999 until 2003, I was the Liberal Democrat

You make clear you've never been the Shadow Secretary of State and you say you are extensively

80

Can you see that, Sir Vince?

Trade and Industry spokesman ..."

top.

Q. It says:

A. (No audible answer)

(20) Pages 77 - 80

1		
		involved in issues related to Post Office closures and
2		you remembered Alan Johnson introducing Horizon as
3		a system. You've dealt with that a little this morning
4		with Mr Beer.
5		It's the second part I want to look at particularly
6		and if you see that there:
7		"When I was a backbencher, there were continuing
8		debates about government IT systems (the NHS and Inland
9		Revenue systems were complete disasters) so there was
10		a certain amount of scepticism about this new IT system
11		[Horizon], but we had no information indicating that
12		this one didn't or wouldn't work."
13		I just want to ask you a few questions about that.
14 15		So before you took up your ministerial role, you were
15 16		aware of continuing debates about Government IT systems being problematic?
17	A.	Mm.
18	д. Q.	Those debates were about IT failures in multiple public
19	પ્લ.	IT projects?
20	Α.	Mm.
21	Q.	You're nodding, Sir Vince. For the transcript,
22		unfortunately, you have to either say "yes" or "no"?
23	Α.	Sorry, I was I didn't quite hear your question.
24	Q.	Sorry. You were aware, looking at your evidence, that
25		there had been IT failures in multiple different
		81
1		expected that kind of scepticism that you held about
2		public IT systems, and Horizon itself, to have been
2		adopted by others, including in the Post Office, in the
4		Civil Service and in other public agencies, contracting
5		
5 6	Α.	for IT or managing IT systems?
5 6 7	A.	for IT or managing IT systems? Yes, I would have expected people to be in inherently
6 7	Α.	for IT or managing IT systems? Yes, I would have expected people to be in inherently sceptical. I think, in the case of the Post Office,
6	A.	for IT or managing IT systems? Yes, I would have expected people to be in inherently sceptical. I think, in the case of the Post Office, I remember this was this flurry of concern when Alan
6 7 8	Α.	for IT or managing IT systems? Yes, I would have expected people to be in inherently sceptical. I think, in the case of the Post Office,
6 7 8 9	Α.	for IT or managing IT systems? Yes, I would have expected people to be in inherently sceptical. I think, in the case of the Post Office, I remember this was this flurry of concern when Alan Johnson was the Minister, and quite a lot questions were
6 7 8 9 10	Α.	for IT or managing IT systems? Yes, I would have expected people to be in inherently sceptical. I think, in the case of the Post Office, I remember this was this flurry of concern when Alan Johnson was the Minister, and quite a lot questions were asked, including by me, but, by the time I had been in
6 7 8 9 10 11	Α.	for IT or managing IT systems? Yes, I would have expected people to be in inherently sceptical. I think, in the case of the Post Office, I remember this was this flurry of concern when Alan Johnson was the Minister, and quite a lot questions were asked, including by me, but, by the time I had been in Government, that was 10 years later and they'd had
6 7 8 9 10 11 12	Α.	for IT or managing IT systems? Yes, I would have expected people to be in inherently sceptical. I think, in the case of the Post Office, I remember this was this flurry of concern when Alan Johnson was the Minister, and quite a lot questions were asked, including by me, but, by the time I had been in Government, that was 10 years later and they'd had 10 years to get their system organised and iron out any
6 7 8 9 10 11 12 13	A. Q.	for IT or managing IT systems? Yes, I would have expected people to be in inherently sceptical. I think, in the case of the Post Office, I remember this was this flurry of concern when Alan Johnson was the Minister, and quite a lot questions were asked, including by me, but, by the time I had been in Government, that was 10 years later and they'd had 10 years to get their system organised and iron out any problems and as I I had no reason to assume that it
6 7 8 9 10 11 12 13 14		for IT or managing IT systems? Yes, I would have expected people to be in inherently sceptical. I think, in the case of the Post Office, I remember this was this flurry of concern when Alan Johnson was the Minister, and quite a lot questions were asked, including by me, but, by the time I had been in Government, that was 10 years later and they'd had 10 years to get their system organised and iron out any problems and as I I had no reason to assume that it wasn't the working properly.
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6 7 8 9 10 11 12 13 14 15 16 17 18 19 20	Q. A.	for IT or managing IT systems? Yes, I would have expected people to be in inherently sceptical. I think, in the case of the Post Office, I remember this was this flurry of concern when Alan Johnson was the Minister, and quite a lot questions were asked, including by me, but, by the time I had been in Government, that was 10 years later and they'd had 10 years to get their system organised and iron out any problems and as I I had no reason to assume that it wasn't the working properly. Putting Horizon to one side just for a minute, you were aware of continuing reporting of problems in these kind of IT projects, including in the public sector, at the time you became Secretary of State? Yes, that's fair. I mean, just to be really obvious, from 2010 on, the
6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	Q. A.	for IT or managing IT systems? Yes, I would have expected people to be in inherently sceptical. I think, in the case of the Post Office, I remember this was this flurry of concern when Alan Johnson was the Minister, and quite a lot questions were asked, including by me, but, by the time I had been in Government, that was 10 years later and they'd had 10 years to get their system organised and iron out any problems and as I I had no reason to assume that it wasn't the working properly. Putting Horizon to one side just for a minute, you were aware of continuing reporting of problems in these kind of IT projects, including in the public sector, at the time you became Secretary of State? Yes, that's fair. I mean, just to be really obvious, from 2010 on, the historic risk about IT, public or private, didn't go
6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	Q. A. Q.	for IT or managing IT systems? Yes, I would have expected people to be in inherently sceptical. I think, in the case of the Post Office, I remember this was this flurry of concern when Alan Johnson was the Minister, and quite a lot questions were asked, including by me, but, by the time I had been in Government, that was 10 years later and they'd had 10 years to get their system organised and iron out any problems and as I I had no reason to assume that it wasn't the working properly. Putting Horizon to one side just for a minute, you were aware of continuing reporting of problems in these kind of IT projects, including in the public sector, at the time you became Secretary of State? Yes, that's fair. I mean, just to be really obvious, from 2010 on, the historic risk about IT, public or private, didn't go away with the forming of the Coalition, did it?

spark your memory a little. If I mention Libra,

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25

1 A. Yes.

3

- 2 Q. -- public projects?
 - A. The answer is, yes, yes.
- 4 Q. You give examples of the NHS and the Inland Revenue but
 - there had been others, hadn't there?
- 6 A. Yes, indeed.
- 7 Q. This had informed the public narrative that Government
- 8 and other public bodies, when it came to IT, came with
- 9 a particular known susceptibility to a degree of risk;10 is that fair?
- 11 A. I'm not sure this was necessarily just public bodies.
- 12 I think probably private companies had the same problem.
- 13 Q. Okay. But there had been disasters which had been
- 14 particularly costly to the public purse, hadn't there?
- 15 A. Yes, there had. In fact, I -- shortly before I went
- 16 into Government, I remember taking Gordon Brown to task
- 17 because of the problems with the Inland Revenue and
- 18 large amounts of loss of money.
- 19 $\,$ Q. $\,$ Yes, and there had been projects that were just, as you
- put it, simply complete disasters in the sense that theyjust simply didn't do what they were intended to do; is
- 22 that fair?
- 23 A. Yes, I think it is fair, yes.
- 24 $\,$ Q. You refer there in your witness statement to a certain
- 25 amount of scepticism about Horizon. Would you have 82

1		a system that was running in the Magistrates Court and
2		another system that had been developed by ICL Fujitsu
3		and it having been criticised in the mainstream media,
4		following what if it is work by the NAO in 2011, would
5		that have been something you'd have been aware of?
6	Α.	Not that specific case, I don't think so.
7	Q.	Again, stepping away from Horizon for a second, if there
8		were allegations and concerns about a third-party
9		contractor who was contracting across Government and
10		different public IT platforms, were there systems in
11		place for information sharing across Government
12		departments or public agencies where there were
13		different commercial contracts with different
14		departments or different public bodies?
15	Α.	I certainly knew nothing about that. The only trying
16		to help answer your question, that I think in the middle
17		of my period of Secretary of State, the computer systems
18		actually broke down in my Department and I tried to find
19		out why that was, and it was being blamed on me because
20		I had given instructions that contracts should be
21		awarded to small companies, rather than big
22		multinationals, where there was a choice. And it turned
23		out that the small guys hadn't been able to operate the
24		system properly. And unfortunately, the decision had to
25		be reversed. So I was aware that there had been systems 84

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with.

1		failures, yes.
2	Q.	I think we are at slight cross purposes, Sir Vince. I'm
3		suggesting I'm just asking if you can help the
4		Inquiry understand, where you have different commercial
5		contracts with a third-party contractor, in different
6		Government departments or different public agencies, is
7		there a system across Government for sharing
8		intelligence about concerns that might arise in respect
9		of one contractor, albeit that there are different
10		contracts with different bodies or different public
11		departments?
12	Α.	Well, the answer is I don't know but I think that the
13		Cabinet Office were the people in Government whose job
14		it was to ensure that that kind of coordination took
15		place.
16	Q.	Okay. I think you've told Mr Beer this morning that
17		Horizon wasn't on your radar until fairly late in your
18		ministerial appointment. Whether in 2013, at the time
19		of the Private Eye article being circulated to you, or
20		later in March 2015, when you were dealing with the
21		correspondence around the Select Committee and James
22		Arbuthnot, if you had been aware either of difficulties
23		in the early development of Horizon and, separately, if
24		there were other difficulties arising in projects
25		developed or managed by ICL Fujitsu, would either of 85

1	Q.	Indeed, and the Inquiry has heard evidence about the
2		development and the management of Horizon throughout the
3		years and I'm not asking you questions about that
4		evidence.
5		But one final question: we've talked about issues
6		arising, can you recall whether there was any discussion
7		about the performance of Fujitsu as a repeat Government
8		contractor across departmental lines at any time when
9		you were Secretary of State?
10	Α.	No, I can't recall them. My dealings with Fujitsu were
11		in a totally different context because we had
12		an industrial strategy designed to develop manufacturing
13		industry and I think they were partners or part of the
14		ICT arm of the industrial strategy, and they contributed
15		to thinking about Government training, and so on. But
16		I certainly was never involved, to my recollection, in
17		any discussions about Fujitsu as a contractor.
18	Q.	Just to raise you having said that, and their role in
19		the wider industrial strategy, we know that the campaign
20		run by subpostmasters, including Mrs Hamilton, was
21		running well before you became Secretary of State in
22		2010. At any time when you were talking to civil
23		servants or other officials around the strategy and any
24		role played by Fujitsu, did anyone mention that they
25		were involved in these concerns around Horizon issues?

1	those matters have increased or decreased your
2	scepticism?

- 3 A. Well, as I explained to Mr Beer, I think the 2013 case,
 - I just saw as a public relations issue. I didn't
 - realise it was anything to do with policy. Perhaps
- 6 I should have read it more carefully but I didn't
- 7 realise at the time. And the 2015 case, yes indeed, all
- of these issues came together, and I did realise there 8
 - was a systemic problem here because a lot of serious
- 10 people were questioning it. I don't remember the name
- 11 of the contractor to ever have been mentioned in this
- context, but I'm -- as your question suggests, there was 12 13 an issue with them.
- 14 Q. Separately, would you have expected, if anyone in the Post Office or in ShEx, or in any role responsible for 15
- 16 representing the interests of the shareholder, if they'd
- 17 had information about difficulties in the early
- development of Horizon or difficulties arising in other 18
- 19 projects run by the contractor, would you have expected
- 20 them to have similarly increased scepticism?
- 21 A. Yes, I would but I think your phrase about the early 22 stages -- I mean, I think it was introduced in, was it
- 23 1999? So I think 10 years later, I would have expected
- 24 that, if there were any problems, they'd been dealt

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1 Α. Not that I recall, no. 2 Would you have expected that ought to have been Q. 3 something that was raised with you? 4 A. Well, as I said, and in response to Mr Beer's question, 5 I did expect to have been briefed at the beginning of my 6 term of office, that questions were being raised about 7 the computer system by serious people, which they were. 8 But I was not briefed about it, no. MS PATRICK: Thank you very much, Sir Vince. Those are all 9 10 the questions that we have. THE WITNESS: Thank you. 11 12 Questioned by MS PAGE 13 MS PAGE: Over to me now, I think, Sir Vince. 14 I'd like to ask you about your strategic objectives. 15 A. Yes. Q. No need to bring it up but in paragraph 31 of your 16 17 witness statement you set out three strategic objectives. The first was to secure funding for the 18 network and Network Transformation specifically, with 19 20 a view to stopping closures, yes? 21 Α. Yes 22 Q. Then your second was to separate the Post Office from 23 Royal Mail Group with a view to then privatising Royal 24 Mail Group? 25 A. Correct. 88

- Then, finally, you hoped to mutualised the Post Office? Q. 1
- 2 Α. Correct
- 3 Q. How did you come up with those three strategic 4 objectives?
- 5 Well, it was -- I was responsible for the Department, Α. 6 I'd had a background in Post Office issues, to a limited
- 7 extent. I think the overriding one of those three was 8 getting of funding for Network Transformation. It was
- 9 difficult because this was a time of austerity, most
- 10 Government services were being cut. I could see from my
- 11 having dealt with the Post Office Network that it was in
- 12 a state of collapse, it had fallen from, I think, 17,000
- 13 to 11,000 branches in the decade since I first raised it
- 14 and, unless something dramatic was done, there wasn't
- 15 going to be a network, although it mattered enormously 16 to millions of people.
- 17 So it needed an injection of cash and commitment to 18 turn it round and, certainly, whenever I met Post Office
- 19 officials -- I didn't very often but, when I did, the
- 20
- issue that was at the top of my mind was were they doing
- 21 this effectively, was it working? And it was, actually,
- 22 because I think, to my recollection, there haven't been
- 23 any more post office closures net since that time.
- 24 So that objective was your pre-eminent one. Your second Q. 25
 - strategic objective, was that interlinked to it? 89
- 1 it, in at least this sense: that when all shares were
- 2 sold in Royal Mail Group, that brought in 3.3 billion
- 3 for the Treasury, didn't it?
- 4 A. Yes, there was a big dispute as to whether we could have 5 got more but, in retrospect, actually, the Royal Mail is
- 6 worth less now than when we sold it. So yes, I think
- 7 that was considered a success. I mean, the issue was
- 8 not actually simply a question of raising money; the
- 9 main reason we did it was to enable the Royal Mail to
- 10 survive. Its business was dying because --
- 11 Q. To bring in private injections?
- 12 A. Yes, so the Treasury would not allow the Post Office to
- 13 raise -- would not allow it to borrow when it was under
- 14 public ownership. So if it was to finance its -- you
- 15 know, modernise, it could only happen in the private 16 sector.
- 17 Q. But I asked you whether the two were interlinked and you
- 18 have suggested not. Are you saying that George
- 19 Osborne's Treasury would have given out £2 billion for
- 20 the network if there hadn't have been the promise of
- 21 £3.3 billion coming in from the sale of --
- 22 A. No, I think they were completely separate issues. We 23 had no idea at the time that the sale was launched how 24 much would be realised, and there was no connection.
- 25 Even though, as you said yourself, this was a time of Q. 91

- I don't think they were necessarily linked. The issues 1 Δ
- 2 around the separation of the Post Office and the Royal
- 3 Mail were essentially sort of technical and legal, and 4
 - I think they were handled very effectively by Ed Davey,
- who did a lot of the preparations for that and the 5
 - legislation around it. I didn't get involved in that.
 - The third one, which I did care about, goes back to
- 8 when I was campaigning for the postmasters. You know,
- 9 we felt as a matter of principle that this was a very
- 10 unequal and unfair relationship, it needed to be
- 11 addressed and it needed radical change and we had
- 12 support for that idea from the Federation. So that was
- 13 how that originated. It wasn't -- it was quite
- 14 disconnected from the others.
- 15 Q. Well, the second one, of course, was pre-existing in the
- 16 sense that the previous Labour administration had made
- 17 moves in the direction of separation and privatisation;
- 18 that's right, isn't it?
- 19 A. Yes, that's correct, yes.
- 20 Q. Obviously, your first objective of securing the
- 21 £2 billion funding for the network, that did happen and
- 22 there was then a period of time over which that funding
- 23 was released.
- 24 Α. Yes
- 25 Q. Your second objective was also a success though, wasn't 90
- 1 cutting back, a time of the launch of austerity, and the 2 Treasury was very reluctant to give out money?
- 3 A. Yes. No, actually, the big cost to the Treasury was the 4 cost of the pension fund. It swamped all the other 5 financial consideration.
- 6 Q. That's certainly another factor, isn't it, because there 7 was some --
- 8 A. If I could just finish my answer. The reason we pressed 9 for it was for political reasons. It was -- certainly
- 10 I believed and my party colleagues believed, that the
- 11 Post Office Network was a major national priority and it
- 12 needed funding, and we, in the negotiations with the
- 13 Treasury, identified certain key issues -- and that was
- 14 one, and Catapult Network was another, I could list half
- 15 a dozen -- where we wanted more money, even at a time 16 frame when cuts were having to be made.
- 17 Q. But you couldn't sell Royal Mail Group with the problems
- 18 that it had with the pension pot, could you? There was
- 19 a £28 billion pension pot there that needed to cover
- 20 £37.5 million of liabilities, didn't it?
- 21 A. Yes. It had to be dealt with before a sale could take
- 22 place. No shareholders would have taken it on 23 otherwise.
- 24 Q. Although that was a problem in the sense that the
- 25 liabilities were greater than the sum of money there, in 92

1		the short-term, for the Treasury, that was $\pounds 28$ billion	1		I wanted them to do and the Post Ministers were aware
2		straight in the door, wasn't it?	2		that those were our priorities and very aware of them
3	Α.	Yes, indeed.	3		and carried them out.
4	Q.	Albeit that there was then, for future administrations,	4	Q.	Can I just then turn to some of the specifics about how
5		a long-term problem of £37.5 billion that needed to be	5		they may have related to what happened within Post
6		paid out in the future?	6		Office. In July 2013, you were making an announcement
7	Α.	Yes, well, as you know, there has been a big argument	7		in Parliament about privatisation and, shortly before
8		about the measurement of the liabilities of pension	8		that, Jo Swinson had to give a short reaction in
9		funds, depending on the interest rate and the discount	9		Parliament to the Second Sight Interim Report. What I'd
10		rate. So, I mean, we could have a long debate about the	10		like to be brought up, first of all, is her statement.
11		privatisation of Royal Mail but I'm trying to see the	11		It's POL00141558. If we just zoom in to the middle of
12		connection with the Post Office	12		the second paragraph, there is just a one-liner and it
13	Q.	Well, the simple point is this: those issues were	13		says this sorry, this is the second paragraph as we
14		interrelated, weren't they? There was no way there was	14		see it on the page:
15		going to be funding for the Post Office unless the	15		"It is important to note that the issues in the
16		Treasury was going to get in both the £28 billion	16		report [that's the Second Sight Interim Report] have no
17		pension pot and what was ultimately, although not known	17		impact on Royal Mail, which is an entirely separate
18		at the time, £3.3 billion in shares?	18		business."
19	Α.	I didn't see them as interlinked. I saw them as	19		If we also go to a Whip's briefing that lies behind
20		separate problems.	20		that statement from Ms Swinson, if we could go, please,
21	Q.	How did the people within Post Office and Royal Mail	21		to UKGI00001679, and we go to page 2, please, and under
22		Group know about your three strategic objectives?	22		a heading of "Wider impacts". As I say, this is the
23	Α.	Almost certainly because I told them. I had a courtesy	23		Whip's briefing that sits behind the statement that Jo
24		meeting with the Chief Executive and the Chair, shortly	24		Swinson made on 9 July:
25		after the Post Office was separated and I spelt out what 93	25		"The timing of Arbuthnot's intended statement 94
1		[that's his intended statement about the Second Sight	1		factor was around the trade union, the CWU, who were
2		Interim Report] should be considered in the context of	2		threatening to go on strike. That was a big risk factor
3		the Royal Mail privatisation	3		for the investors, and that was the one the only one
4		"Vince Cable and Michael Fallon are making	4		that I recall being discussed with any seriousness.
5		a statement to Parliament on Wednesday, 10 July [that's	5	Q.	So this going on in the background, we can take it that
6		one day after Ms Swinson's statement], setting out the	6		it wasn't something that was coming directly from you
7		steps towards a Royal Mail transaction. In the eyes of	7		but, nevertheless, this was, because you had
8		many MPs, the media and the public at large, Royal Mail	8		communicated your three strategic objectives, something
9		and the Post Office are the same entity. Although not	9		which people knew you needed to have happen. Right?
10		related, the adverse coverage that Arbuthnot is seeking	10	Α.	Yes, that's correct.
11		to attract is likely to have a significant and	11	Q.	So whilst you may not have become involved in what
12		diversionary impact on the messaging of the Royal Mail	12		people at Post Office and, indeed, in Government
13		statement."	13		supporting Ms Swinson were getting up to, they were
14		So those can come down. So here's the point, isn't	14		helping, because they thought it was necessary, to get
15		it, Sir Vince: that it was seen as essential not to let	15	_	the privatisation over the line?
16		problems with the Second Sight Interim Report get in the	16	Α.	Yes, well getting the privatisation over the line
17		way of a statement that you were about to make that	17		depended on managing a group of risk factors. I don't
18		related to privatisation?	18		recall this being one of them. As I say, the risk
19	Α.		19		factors overwhelmingly centred on industrial relations
20		that's correct, actually. I mean, I became involved in	20		issues. It may be, as you say, that there were people
21		the Royal Mail privatisation because it was highly	21		in the who were involved in the Post Office who were
22		controversial and I had to lead from the front. It was	22		worried that they might be creating a problem. The
23		being led by a Minister of State but I got sufficiently	23		people who had identified risk factors were the brokers
24 25		involved to be aware of some of the risk factors,	24		and the investment managers, and they would have said,
		I don't recall this ever being mentioned. The big risk	25		"This is worrying us". I don't recall they ever did.

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(24) Pages 93 - 96

1	^	You may not have seen some of the ovidence in the	1		"I cought up with Sucon this ovening after we
1	Q.	You may not have seen some of the evidence in the	1		"I caught up with Susan this evening after we
2	•	Inquiry about Ms Vennells' work on the prospectus?	2		finished. She had finished her meeting with [Second
3	A. Q.	-	3		Sight]"
4	Q.		4		She says "wade" but I think we can take it that she "was":
5		taken out that was going to be about the Horizon	5		
6	Α.	problems.	6		" of the view that they do now understand the
7			7		risk of being caught up in something bigger and more
8	Q.		8		sensitive. She is hoping their report should be more
9 10		keep on that one. So that may have been an example, may	9		balanced, should say they have found no evidence of
10		it not, Sir Vince, where you didn't know but the people	10		systemic Horizon (computer) issues but will confirm
11 12		acting within the Post Office knew that there was a risk	11 12		shortcomings in support processes and systems, and that
		factor that they wanted to take out of the picture in	12		Post Office has already identified and corrected a number of these."
13	•	order to help your strategic direction?			
14	А.	Yes, what you say seems to be perfectly fair. All I can	14		Then she talks about James Arbuthnot:
15		say is that I didn't I wasn't aware of it as a risk	15		"I hope when they speak to James tomorrow that they
16		factor, and I was involved in the privatisation, so	16		will confirm all this. They will also want to say their work is not finished and therefore still not
17	~	l would have, I think, known.	17		
18	Q.	Yes. Well, let me just give you another example,	18		conclusive."
19		perhaps, of what may have been going on behind the	19		Now, something bigger and more sensitive, this email
20		scenes. If I could bring up POL00296944, please. This is an email between the Chief Executive and the Chair.	20		is on 1 July 2013. Ms Swinson was to make the statement
21 22			21 22		about the Interim Report in Parliament on 9 July, and
22		and it's about finessing the Second Sight Interim			your statement about privatisation was on 10 July. This
23 24		Report. In that second paragraph, she's referring to conversations that she had with her General Counsel,	23 24		again, rather looks as if this is people within the Post
24 25		Susan Crichton. She said:	24 25		Office worrying about Second Sight tying into something
25		97	25		bigger and more sensitive, ie the privatisation; does 98
1		that make sense to you?	1		Now, you've been asked a number of questions by
1 2	А.	that make sense to you? Yes, it does make sense.	1 2		Now, you've been asked a number of questions by Mr Beer about the correspondence that either was or
		Yes, it does make sense.			Now, you've been asked a number of questions by Mr Beer about the correspondence that either was or wasn't sent through to your office, when you were
2		Yes, it does make sense. Yes. So this appears to be an attempt to have the	2		Mr Beer about the correspondence that either was or wasn't sent through to your office, when you were
2 3		Yes, it does make sense. Yes. So this appears to be an attempt to have the Interim Report's findings managed in a way so as not to	2 3		Mr Beer about the correspondence that either was or wasn't sent through to your office, when you were Secretary of State for BIS, and what happened to that.
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2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	Q. A.	Yes, it does make sense. Yes. So this appears to be an attempt to have the Interim Report's findings managed in a way so as not to disrupt your strategic plans. Are you confident that there was no one in Government putting any pressure on Post Office to do that sort of thing? Well, I simply I don't know. The ShEx, who were the unit responsible for Post Office, were also the people who were managing the privatisation from the BIS point of view, so it was the same group of people. Whether they acted the way you describe, I have absolutely no way of knowing but I can see that, if you're looking for no, conspiracy is too hard a word but, if you're looking for attempts to manage the issue then what you say makes sense. PAGE: Thank you. Those are my questions. Questioned by MR STEIN STEIN: Sir Vince, my name is Sam Stein, I appear on behalf of a very large group of subpostmasters and staff that worked in branches.	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	Q. A.	Mr Beer about the correspondence that either was or wasn't sent through to your office, when you were Secretary of State for BIS, and what happened to that. I am just going to quote from paragraph 37 of your statement. We don't need it on the screen. Sir Vince, you say there this: "Whilst Horizon was on a few occasions raised in correspondence addressed to me, with very few exceptions, my correspondence were dealt with by officials at the level of the responsible junior minister, none of whom flagged these issues to me as needing my engagement." That's what you've been said in your statement. You've been asked a large number of questions about that by Mr Beer. Okay. Mm. I'm not going to repeat those questions. I'm going to go to a different type of information that BIS was aware of. Mm.
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	Q. A.	Yes, it does make sense. Yes. So this appears to be an attempt to have the Interim Report's findings managed in a way so as not to disrupt your strategic plans. Are you confident that there was no one in Government putting any pressure on Post Office to do that sort of thing? Well, I simply I don't know. The ShEx, who were the unit responsible for Post Office, were also the people who were managing the privatisation from the BIS point of view, so it was the same group of people. Whether they acted the way you describe, I have absolutely no way of knowing but I can see that, if you're looking for no, conspiracy is too hard a word but, if you're looking for attempts to manage the issue then what you say makes sense. PAGE: Thank you. Those are my questions. Questioned by MR STEIN STEIN: Sir Vince, my name is Sam Stein, I appear on behalf of a very large group of subpostmasters and staff that worked in branches. I work with Mr Jacobs, who appears on my left, and	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	Q. A.	Mr Beer about the correspondence that either was or wasn't sent through to your office, when you were Secretary of State for BIS, and what happened to that. I am just going to quote from paragraph 37 of your statement. We don't need it on the screen. Sir Vince, you say there this: "Whilst Horizon was on a few occasions raised in correspondence addressed to me, with very few exceptions, my correspondence were dealt with by officials at the level of the responsible junior minister, none of whom flagged these issues to me as needing my engagement." That's what you've been said in your statement. You've been asked a large number of questions about that by Mr Beer. Okay. Mm. I'm not going to repeat those questions. I'm going to go to a different type of information that BIS was aware of. Mm. Can we go, please, to a document which is POL00141382.
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	Q. A.	Yes, it does make sense. Yes. So this appears to be an attempt to have the Interim Report's findings managed in a way so as not to disrupt your strategic plans. Are you confident that there was no one in Government putting any pressure on Post Office to do that sort of thing? Well, I simply I don't know. The ShEx, who were the unit responsible for Post Office, were also the people who were managing the privatisation from the BIS point of view, so it was the same group of people. Whether they acted the way you describe, I have absolutely no way of knowing but I can see that, if you're looking for no, conspiracy is too hard a word but, if you're looking for attempts to manage the issue then what you say makes sense. PAGE: Thank you. Those are my questions. Questioned by MR STEIN STEIN: Sir Vince, my name is Sam Stein, I appear on behalf of a very large group of subpostmasters and staff that worked in branches. I work with Mr Jacobs, who appears on my left, and we are instructed by a firm of solicitors who have long	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	Q. A.	Mr Beer about the correspondence that either was or wasn't sent through to your office, when you were Secretary of State for BIS, and what happened to that. I am just going to quote from paragraph 37 of your statement. We don't need it on the screen. Sir Vince, you say there this: "Whilst Horizon was on a few occasions raised in correspondence addressed to me, with very few exceptions, my correspondence were dealt with by officials at the level of the responsible junior minister, none of whom flagged these issues to me as needing my engagement." That's what you've been said in your statement. You've been asked a large number of questions about that by Mr Beer. Okay. Mm. I'm not going to repeat those questions. I'm going to go to a different type of information that BIS was aware of. Mm. Can we go, please, to a document which is POL00141382. The date of this document is May 2012. If you'll take

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25 July 2024

1		so this is pretty much two years into your time as
2		Secretary of State dealing with these matters.
3		You've just been asked a few questions that touched
4		upon Post Office Network Transformation. You're
5		familiar with the discussions about that and you'll
6		recall, I hope, that there was a BIS Select Committee
7		that was set up to consider issues that related to
8		Network Transformation at around the same time in 2012?
9	Α.	No, I don't actually recall that but I appeared before
10		the Select Committee every year and they interrogated me
11		about the things that they thought I should know.
12	Q.	Right. Now, this is the written evidence, as you'll
13		see, submitted by Shoosmiths solicitors, and you can see
14		there that, if we go to just a few of these paragraphs,
15		paragraph 2:
16		"Access Legal from Shoosmiths, a national law firm,
17		have been contacted by almost 100 SPMs [subpostmasters]
18		who have suffered losses they cannot explain and have
19		been subject to disciplinary measures by POL. All are
20		adamant that they or their staff have not stolen any
21		money. They claim that the Horizon system
22		an Electronic Point of Sale and accounting system POL
23		require them to use, has caused the errors or not
24		enabled them to work out why the errors have appeared in
25		the first place."
		101
1		The reasons they do this vary, but are typically related
2		to an inability to pay (often due to have made various
3		repayments previously) and a desire to keep the post
4		office open for their community. When doing the above
5		an SPM is committing false accounting, albeit not to
6		enrich themselves, or to deny POL what is rightfully
7		theirs."
8		So by the time we get to paragraph 8 we've got
9		a description, by a national law firm, representing 100
10		subpostmasters in May 2012, setting out real fundamental
4.4		difficulties with the lineway systems, people being words

11 difficulties with the Horizon system, people being made 12 to do things within their branches that they shouldn't 13 have to. So these are complicated, cogent submissions 14 being made by this law firm, Shoosmiths; do you agree? 15 A. Absolutely. Yes. Now, did this information, this submission, get through 16 Q. 17 to you? 18 Α. No. Right. Help the rest of us understand why not. This is 19 Q. 20 a public consultation by a Select Committee in

- 21 Parliament, where these issues, which are serious, are
- 22 being raised in relation to Network Transformation,
- which is meant to be informative for the Post Office.
- 24 "Get this thing up and running, get it back on its
- 25 feet", but the Shoosmiths solicitors are saying, "Hang 103

They go on to say there: 1 2 "They claim there has been no real investigation by 3 POL as to the cause of the losses that have appeared --4 SPMs are expected to pay it back regardless of how it 5 was caused." 6 Go to paragraph 3: 7 "POL are adamant that the Horizon system has no 8 faults." q Go down to paragraph 7, please. What is being said 10 here is about: 11 "If the SPM ever faced with a loss when balancing, the SPM is presented with two options on the Horizon 12 13 system: 'Settle Centrally' or 'Make Good Loss'. Settle 14 centrally means that, according to POL, the loss can be 15 investigated. However the description of this from SPMs 16 means that it just means the loss will be taken from the 17 SPM's remuneration either as a lump payment or in 18 stages. If 'make good loss' is selected the SPM must 19 make good the loss there and then out of their own 20 pocket. One of these options must be selected otherwise 21 an SPM will not be able to trade the following day." 22 I'm just then going to touch on paragraph -- I think 23 it is 8. Yes: 24 "Some of the SPMs have told Horizon that they have 25 made good the losses when in actual fact they haven't. 102 1 on, there's a real problem here"; how come that didn't 2 get through to you as the Secretary of State for BIS? 3 **A.** I don't know why it didn't get through to me. My own 4 perceptions, as I tried to describe earlier, were based 5 on the contacts I had with individual postmasters, and 6 I was aware, as I've described, that there were some 7 terrible things happening, and the one that I cared most 8 about was in my constituency, and I'd contacted the

- family and I said, you know, "What's happened? We've
- 10 lost our post office, you're being charged with fraud.
- 11 What happened?" And the explanation from the family --
- I didn't speak directly to the postmaster -- was "We
 think that we made a mistake, and we're being punished
- 14 in a ridiculously excessive way".

- So that's how I started thinking about this problem
 and, as I also said, I think around about 2012/13, I was
 visited by the Federation -- a regional head or
 a national figure, I don't know -- but I was visited by
 the Federation, who had this scrap book full of
- 20 photographs of some of these postmasters who were in
- terrible situations -- I mean, you know all about them,
- 22 they've been in the Inquiry -- and clearly very
- 23 emotional about it, and we sat in a meeting trying to
- 24 understand why this had happened.
- 25 And the theory they had, and I agreed with, was that 104

1		what was happening was that mistakes were being made,
2		you know, obvious mistakes but, you know, postmasters
3		are handling vast sums of money and large numbers of
4		transactions, you know, perfectly honest, understandable
5		mistakes we all make in every aspect of live, and they
6		were being brutally punished for it. And that was my
7		understanding, it was this kind of 'one strike and
8		you're out' policy which the way I interpreted it,
9		and the Federation, when they came to see me, confirmed
10		that view.
11		I don't ever recall this being discussed in terms of
12		Horizon problems. I mean, it may have been mentioned,
13		but it didn't register with me because other people were
14		giving a very clear explanation about why this was
15		happening. It reflected very badly on the Post Office
16		but it wasn't about computers.
17	Q.	Well, let's have a look at what is being said in a very
18		clear explanation a little bit further. Paragraph 8,
19		the description there of what is happening by SPMs that
20		are having to make good the losses, when they haven't,
21		and related to an inability to pay, desire to keep the
22		Post Office open for their community. When doing that,
23		the Shoosmiths submissions say this:
24		"When doing the above an SPM is committing false
25		accounting, albeit not to enrich themselves or deny POL 105
1		that right?
1	•	that right?
2	A.	That's correct.
2 3	A. Q.	That's correct. Well, let's deal with the NFSP, paragraph 17:
2 3 4		That's correct. Well, let's deal with the NFSP, paragraph 17: "National Federation of SubPostmasters the NFSP
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1		what is rightfully theirs."
2		Paragraph 9, last sentence, losses that have been
3		discussed by Shoosmiths Solicitors, losses between
4		£6,000 and £150,000.
5		Paragraph 10:
6		"The SPM then has, according to POL, an opportunity
7		to explain the losses [and so on]. Typically the SPM's
8		contract will be terminated and POL will request any
9		losses that are repaid under the contract."
10		Paragraph 12 we'll touch on and then I'll move on to
11		something that may assist in relation to the NFSP:
12		"If the loss is not repaid POL will prosecute the
13		SPM for false accounting. SPMs are typically advised by
14		their legal advisers to plead guilty to false
15		accounting, as in the above circumstances they will have
16		committed it. Many will be charged with theft or fraud
17		but these charges are typically dropped in these
18		circumstances. SPMs have been imprisoned as a result of
19		convictions for false accounting."
20		So, Sir Vince, my point, on behalf of the group of
21		people I represent, the subpostmasters, people working
22		in branches, is that these were all matters that could
23		have been investigated, that could have been looked into
24		by BIS, essentially the Department in control over the
25		Post Office, but this was never taken to your level; is
25		Post Office, but this was never taken to your level; is 106
25		-
		106
25 1		106 explained, in answers to Mr Beer, my dealings with them
		106
1		106 explained, in answers to Mr Beer, my dealings with them
1 2		106 explained, in answers to Mr Beer, my dealings with them were very limited but positive. I first brought to
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1 2 3 4		106 explained, in answers to Mr Beer, my dealings with them were very limited but positive. I first brought to Parliament the case of a postmistress who had lost her post office, lost upwards of £100,000, and I asked for
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1 2 3 4 5 6 7		106 explained, in answers to Mr Beer, my dealings with them were very limited but positive. I first brought to Parliament the case of a postmistress who had lost her post office, lost upwards of £100,000, and I asked for help from the Federation to advise me, and they succeeded in getting full compensation. So why would I not think of this as an effective trade union?
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1 2 3 4 5 6 7 8 9 10 11 12 13	Q.	106 explained, in answers to Mr Beer, my dealings with them were very limited but positive. I first brought to Parliament the case of a postmistress who had lost her post office, lost upwards of £100,000, and I asked for help from the Federation to advise me, and they succeeded in getting full compensation. So why would I not think of this as an effective trade union? And, similarly, in the other cases that were brought to me, which I've already described, it was clear that they cared passionately about the hardship that postmasters were experiencing. I had no reason whatever to doubt their integrity or their competence. Let's move on through the chronology. This is 2012, two
1 2 3 4 5 6 7 8 9 10 11 12 13 14	Q.	106 explained, in answers to Mr Beer, my dealings with them were very limited but positive. I first brought to Parliament the case of a postmistress who had lost her post office, lost upwards of £100,000, and I asked for help from the Federation to advise me, and they succeeded in getting full compensation. So why would I not think of this as an effective trade union? And, similarly, in the other cases that were brought to me, which I've already described, it was clear that they cared passionately about the hardship that postmasters were experiencing. I had no reason whatever to doubt their integrity or their competence. Let's move on through the chronology. This is 2012, two years into your time as Secretary of State for BIS,
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1 2 3 4 5 6 7 8 9 10 11 2 3 14 15 16 17 18 19	A.	106 explained, in answers to Mr Beer, my dealings with them were very limited but positive. I first brought to Parliament the case of a postmistress who had lost her post office, lost upwards of £100,000, and I asked for help from the Federation to advise me, and they succeeded in getting full compensation. So why would I not think of this as an effective trade union? And, similarly, in the other cases that were brought to me, which I've already described, it was clear that they cared passionately about the hardship that postmasters were experiencing. I had no reason whatever to doubt their integrity or their competence. Let's move on through the chronology. This is 2012, two years into your time as Secretary of State for BIS, okay? Now, you've said this in your evidence: that by the time we get to 2015, you'd realised something bad was happening Mm. and you say, and you've said to this Inquiry that

- 22 essentially, that you'd been able to stay on so that you
- 23 could do something about this. So your words were you
- 24 realised something bad was happening. Well, you're
- 25 right. Jacqueline Falcon was prosecuted in 2015 by the 108

1		CPS for fraud. She was prosecuted for her work at the
2		Hadston post office, she'd worked there for eight and
3		a half years, in total she had worked in branches for
4		15 years, from the year 2000, Hadston branch for eight
5		and a half years, and losses below £1,000, a shortfall,
6		was discovered in that particular branch. The end of
7		2014, that was discovered. In 2015, early 2015, she by
8		that point, based upon advice, pleaded guilty to fraud,
9		into a suspended sentence for three months.
10		In 2015, Jacqueline Falcon was pregnant, going
11		through all of that, she was prescribed antidepressants.
12		So you're right, Sir Vince: something bad was happening.
13		Now when we try and understand what happened at that
14		point, when you hand over to the next person to take on
15		the job of ignoring the problems with the Post Office,
16		at that particular point, what did you do to say to the
17		next person, "Hang on, there's a real problem here.
18		Something bad is happening"?
19	Α.	Well, the answer is I was unemployed after the election
20		for two years, until I got my job back. But it appears
21		to be the case, and I was frankly shocked by this,
22		nothing to do with the Post Office but that when a new
23		Government comes in, they start with a completely blank
24		sheet of paper. I was never when I became Secretary
25		of State, the Civil Service would not tell me what my
		109
1	SIR	WYN WILLIAMS: Didn't we have evidence from the
2		Conservative minister who succeeded the Conservative
3		minister, I forget the precise dates, that that's
4		exactly what happened?
5	MR	STEIN: Yes, well, I think we're establishing that, sir.
6		The question is whether it relates to

- 7 SIR WYN WILLIAMS: I think Ms James said she didn't have8 a briefing from Baroness Neville-Rolfe.
- 9 MR STEIN: My question related to whether, even if it's the
- same minister, whether, essentially, they're not allowedbackground to their own papers, if they carry on.
- SIR WYN WILLIAMS: Sorry, that's a variation on it. Sorry,Mr Stein.
- MR STEIN: Now, we're going through time. As you say, you
 spent two years outside of Parliament, then you come
 back into Parliament. Yes?
- 17 **A.** Yes.
- 18 Q. So the timing we're now getting to, 2017/2018, you're
 aware by that point that there are then, in 2019, the
 judgments in the High Court.
- 21 A. No, I wasn't aware. No.
- 22 **Q.** Well, when were you first aware of the judgments by
- 23 Mr Justice Fraser, now Lord Justice Fraser, in the High24 Court?
- 25 A. Well, I wasn't aware, I think, until this whole Inquiry 111

- 1 predecessors had been advised on a whole range of 2 issues. It was thought to be improper, that we start 3 again with a new Parliament and we have to reinvent the wheel. That unfortunately is the way government 4 5 operates 6 But, certainly, if I'd met Sajid Javid, who was my successor, and this issue had come up, I would have 7 certainly passed on that advice. But the way Government 8 9 works, there isn't a transition, there is no carryover. 10 It's entirely reliant on the Civil Service to maintain 11 continuity. Sir Vince, we understand that that happens certainly 12 Q. 13 between the transition of one government from one party 14 to another, so recently, as we understand it, the position is that the Labour Government will not have 15 16 access to Conservative Government papers. Does that 17 also happen, to your knowledge, in relation to the next 18 administration, even though it may be the same 19 individuals involved? 20 A. Well, it wasn't the same individuals. 21 Q. No. It could be, though? 22 Α. It could be.
- 23 Q. Yes. Does that happen in the same way?
- A. I don't know but I -- it's common sense to suggest thatit should.
 - 110
- process started and journalists started asking me about
 it and what I knew, and following the evidence.
- 3 I certainly had lost all contact with this issue after2015.
- 5 **Q.** Okay. So when you came back into Parliament, and we know that there were issues that were in relation to the
- 7 Post Office going through the High Court, you're saying
- 8 you were aware of that later, and you know that there
- 9 are issues being raised in relation to the criminal
- 10 appeals, did you look into any aspect of those matters?
- 11 A. No, I would have looked into aspects of those matters if
- 12 any of my constituents had become involved. I'd
- 13 reverted to being a backbencher -- I happened to be
- 14 leader of the party but that was a separate matter --
- but in relation to Parliamentary business, I would only
- 16 have encountered them if postmasters in Twickenham had
- been in this situation. I don't think there were any.
- 18 **Q.** You see that represented an opportunity for you to do
- 19 what you've criticised other MPs for. So if you had
- 20 engaged with these issues, if you had read the judgments
- 21 from the High Court, had paid attention to what was
- 22 going on, you would have been able to say to the
- 23 Government at that time, in 2019, "Hang on, there's been
- 24 a problem here. When I was looking at matters such as
- 25 this, nobody brought this to my attention".

2

1	Α.	Well, had I known about it, I could possibly have
2		intervened in the way you describe but, when I came back
3		into Parliament in 2017, Government and opposition were
4		completely overwhelmed by the big new issue, which is
5		called Brexit and, as the leader of my party at the
6		time, I was having to devote 100 per cent of my time to
7		focusing on that, apart from the time I spent on the
8		constituency issues, and I raised issues for
9		constituents in Parliament in debate and questions.
10		I didn't range outside that well, there were many
11		outstanding issues. One of the things which followed me
12		was this Saudi arms deal, for example, and there were
13		half a dozen issues like that, that I dealt with in
14		Parliament, and I realised were still hanging around two
15		years later and I was being asked about them, and but
16		for the reasons I have given, I wasn't then in the
17		business of dealing with Post Office issues.
18	Q.	Last question. Let's turn it round the other way. Did
19		anyone in Government go to you and say, "Sir Vince I've
20		got these issues at the High Court. You may not or may
21		not know about them but let me tell you about them.
22		They've raised serious, deep rooted problem within the
23		Post Office about the Horizon system. It's a mess.
24		Total debacle. People being sent to prison under
25		horrendous circumstances, lives being ruined".
		113

1		Questioned by MR BLAKE				
2	MR	BLAKE: Thank you very much. Can you give your full				
3		name, please?				
4	Α.	My name is Gregory David Clark.				
5	Q.	Thank you. You should have in front of you a witness				
6		statement.				
7	Α.	Indeed.				
8	Q.	Is that dated 28 June this year?				
9	Α.	It is.				
10	Q.	Could I can you to turn to the final substantive page,				
11		that's page 47.				
12	Α.	Yes.				
13	Q.	Can you confirm that that is your signature?				
14	Α.	It is.				
15	Q.	Is that statement true to the best of your knowledge and				
16		belief?				
17	Α.	It is.				
18	Q.	Thank you very much, that has a Unique Reference Number				
19		of WITN10900100 and that will be uploaded onto the				
20		Inquiry's website.				
21		Mr Clark, you were a Member of Parliament between				
22		2005 and this year; is that correct?				
23	Α.	That's correct.				
24	Q.	You've held a number of different ministerial posts, you				
25		served as Minister of State in the Department for 115				

- Did anybody come to you and say, "Sir Vince, what
- were you told about this during your time at BIS"?
- 3 A. Nobody came to me and asked that question. I wish they
- 4 had --MR STEIN: Yes, thank you Sir Vince. 5
- 6 A. -- but they didn't. 7
- SIR WYN WILLIAMS: Thanks, Mr Stein.
- Is that it, Mr Beer? 8
- MR BEER: Yes, it is, sir. 9
- 10 SIR WYN WILLIAMS: Well, thank you very much, Sir Vince, for
- 11 making your witness statement and for coming to the
- Inquiry this morning and answering questions from number 12
- 13 of people. I'm very grateful to you.
- THE WITNESS: Thank you very much, Sir Wyn. 14
- MR BEER: Sir, could we reconvene at 2.00 pm, please? 15
- 16 SIR WYN WILLIAMS: Yes.
- 17 MR BEER: Thank you very much.
- 18 (1.03 pm)

19

(The Short Adjournment)

- 20 (2.00 pm)
- 21 MR BLAKE: Good afternoon, sir. Can you see and hear me?
- 22 SIR WYN WILLIAMS: I can, thank you.
- 23 MR BLAKE: Thank you, sir. This afternoon we're going to
- 24 hear from Mr Clark.
- 25 THE RIGHT HONOURABLEGREGORY DAVID CLARK (sworn) 114
- 1 Communities and Local Government; is that right?
- That's right. 2 Α.
- You were Financial Secretary to the Treasury? 3 Q.
- 4 I was. Α.
- Q. Minister in the Cabinet Office? 5
- 6 Δ Yes

- Q. Minister for Universities and Science?
- 8 A. Correct.
- Q. Secretary of State for Communities and Local Government? 9
- That's right. 10 Α.
- Q. And, relevant to today, you were Secretary of State for 11 12 Business, Energy and Industrial Strategy, and that was
- between 14 July 2016 and 24 July 2019. 13
- 14 A. That's correct.
- Q. That was during the premiership of Theresa May? 15
- A. That's right. 16
- 17 Q. I'm just going to begin with a little bit of background
- 18 before your time as Secretary of State and if I can ask
- to be brought up on screen POL00097393, please. I'm 19
- 20 going to take you to some correspondence relating to
- 21 a constituent of yours, and this is a letter from
- 22 yourself to the Right Honourable James Arbuthnot, and
- 23 you're in conduct with him regarding your constituent,
- 24 Mrs Pauline Thomson, who the Inquiry has heard from in
- 25 an earlier phase, who wished you to refer her case

1		against the Post Office on to Second Sight.	1	
2		"Mrs Thomson has now stated that she is happy for	2	
3		Second Sight to proceed with an investigation of her	3	_
4		case and she has confirmed that she understand her	4	Α.
5		details will be seen by the Post Office."	5	Q.
6		Did you have a number of different cases around this	6	
7		period from subpostmasters, as a constituency MP?	7	
8	Α.	This was the only one in my constituency that I was	8	
9	_	aware of at the time.	9	
10	Q.	Thank you very much. You were corresponding with Lord	10	
11		Arbuthnot in relation to	11	
12		Correct.	12	
13	Q.	the Second Sight investigation into her case?	13	
14	A.	That's right.	14	
15	Q.	Could we please turn to POL00232847. We're now moving	15 16	
16 17		on from January 2013 to March 2015, so quite	10	
18		a considerable time has elapsed and it relates again to the same constituent, Mrs Thomson. In this letter,	17	
10			10	
20		you're corresponding with Paula Vennells about a letter that Mrs Thomson received only a couple of days after	19 20	
20		being told that her case would proceed to mediation?	20	A.
22	۵	Correct.	21	<u>д</u> .
23	Q.	If we turn over the page, we can see the letter that you	23	α.
24	ч.	have enclosed. The letter is marked as "Confidential	20	
25		Not to be disclosed outside of the Scheme and	25	
		117		
1		particular case for the reasons I set out below.	1	
2		"Responsibility for Losses	2	
3		"Post Office considers that the question of	3	
4		responsibility for the losses suffered in your branch	4	
5		was appropriately addressed at the time of the	5	
6 7		suspension of your contract with Post Office on 12 September 2008 and your subsequent prosecution and	6 7	
7 8		conviction. It remains Post Office's view that the	8	
8 9		conclusions drawn at the time were correct and nothing	8 9	
9 10		in our own reinvestigation, nor in the review of your	9 10	
11		case by Second Sight, represents a challenge to that	10	
12		position."	11	
13		So a refusal to mediate the case on behalf of the	13	
14		Post Office.	14	
15	Α.	That's right.	15	
16	Q.	Did you meet with this particular constituent at the	16	
17		time?	17	
18	Α.	I can't remember. I certainly met with her on several	18	
19		occasions during the long period in which I've been	19	
20		trying to help her resolve the case.	20	
21	Q.	We'll come on to talk about the particular case in	21	
			22	
22		a moment but, before I do, I will just take you to	22	
22 23	-	a moment but, before I do, I will just take you to a response that was received to your correspondence,	22	
				А.
23	_	a response that was received to your correspondence,	23	Α.

1		mediation", dated 5 February 2015, so it's during
2		a period where we know that the Working Group is being
3		shut down.
4	Α.	Yes.
5	Q.	I'll just read to you a couple of passages from the
6		letter that was sent to Mrs Thomson. It says:
7		"You will be aware that your case has been looked at
8		afresh and thoroughly reinvestigated by Post Office.
9		Your case has also has been considered by the Scheme's
10		independent forensic accountants, Second Sight Support
11		Services Limited. The reports of both of these
12		investigations have been shared with you.
13		"As you will know, Second Sight recommended that the
14		question of responsibility for losses incurred in your
15		branch should be mediated. In the event, the Scheme's
16		Working Group considered that the issue was suitable for
17		mediation on a deferred basis."
18		So it seems as though Second Sight and the Working
19		Group both considered that Mrs Thomson's case was
20		suitable for mediation.
21	Α.	Indeed.
22	Q.	Then the letter continues:
23		"I regret to inform you that, after careful
24		consideration, Post Office takes a different view and
25		has decided against proceeding to mediation in your 118
		110
1		you and, if we scroll down, she says:
2		"There is, in fact, no inconsistency in the two
2		communications she received.
4		"The first communication she received enclosed
5		Second Sight's final independent review of her case,
6		including Post Office's investigation into the matters
7		it raised. In these reviews, Second Sight offer their
8		view as to whether a case might be suitable for
9		mediation. However, while this is their view, all
10		mediations are entirely voluntary. The final decision
11		on whether or not to mediate a case ultimately rests
12		with the parties involved. It follows that either party
13		can decline to take part.
14		"Mrs Thomson's case has been thoroughly
15		reinvestigated through the Scheme and, after careful
16		consideration of all relevant facts (including Second
17		Sight's final report), the Post Office has concluded
18		that mediation does not offer any realistic prospect of
19		resolving your constituent's complaint for the reasons
20		set out in our letter to her."
21		Prior to becoming Secretary of State, so in this
22		period, what was your understanding of the issues
23		relating to Horizon and Second Sight?
24	Α.	My principal understanding, I think, in fact all of my
25		understanding, came from dealing with Mrs Thomson, and
		120

1 it conditioned my view of certainly the management of 2 Post Office Limited. I mean, on the documents that 3 you've just put up -- I don't know whether we can have 4 that second one again -- that reply from Angela van den 5 Bogerd, I think she was called, I thought was 6 an impudent reply. She didn't answer the question as to 7 why Mrs Thomson was being refused the ability to 8 arbitrate. 9 Indeed, if we look at it, I think they even get her 10 name wrong. I've just noticed that --That's going to be brought up on to the screen. 11 Q. 12 -- now. "Mrs Paula Thomson"; she's called Pauline Α. 13 Thomson. It doesn't say why, it merely asserts that, 14 despite the fact that Second Sight and this panel had 15 recommended it, they say that "We simply decided that we 16 don't want to"; either party can decline to take part 17 and so they've done so. I thought it was an impudent 18 letter to receive in reply to mine to the Chief 19 Executive and it conditioned, as I say, my view of the 20 management of Post Office Limited. 21 Q. Thank you very much. That can come down now. You took 22 office in July 2016. 23 A. Yeah. 24 Q. I'd like to take you to the introductory brief that was 25 provided to you. That can be found at WITN10900103. At 121 1 Q. Thank you. If we scroll down, we can see it begins by 2 outlining some key facts about the Post Office. It then 3 addresses the Department's role, and I'd just like to 4 read to you the first paragraph from the next page. It 5 says: 6 "The BEIS Secretary of State is the sole shareholder 7 of [Post Office], and UKGI manage that shareholding for 8 BEIS, representing Government as [the Post Office's] 9 shareholder and with a position on the Board. UKGI also 10 acts as a voice/guide for [the Post Office] within 11 Government and it maintains relationships with key 12 Department's such as HMT, Cabinet Office and DWP." 13 So it seems as though UKGI represent Government as 14 POL's shareholder but, at the same time, act as 15 a voice/guide for the Post Office within Government. 16 How does that work? 17 A. Well, how it worked then, before there was a team in 18 BEIS, was that regular meetings and briefings and 19 communications to do with the Post Office would come 20 from UKGI, principally, actually, to the Post Office 21 Minister at the time, rather than me directly as 22 Secretary of State. But, as I say in my witness 23 statement, one of the things that I instituted right at 24 the beginning of my tenure was to require each of the 25 Directors General, which is to say the layer below the 123

1		paragraph 33 of your witness statement, you have said
2		that you received introductory briefs from each of the
3		40 or so directorates in your Department; is that right?
4	Α.	Correct, as a standard, yes.
5	Q.	So is this kind of a brief that we're going to see, is
6		this typical of the kinds of briefs you would receive in
7		relation to the areas for which you had responsibility?
8	Α.	Fairly typical. I mean, some were more substantial than
9		others, for example at the time that I took office, one
10		of the first decisions I had to make was whether to
11		approve the Hinkley Point, the nuclear power station,
12		which was and is the biggest construction project in
13		Europe, I think, at the time. So, obviously, the
14		briefing for that was necessarily more substantial but
15		this was not untypical of many briefs that I received.
16	Q.	Are you able to assist us with who might have been
17		responsible for drafting this?
18	Α.	I infer from knowing, I think, with the benefit of
19		hindsight, the structure of things now, that this would
20		have been from UKGI someone in UKGI, perhaps Mark
21		Russell, who was the CEO, who we may come on to discuss,
22		regularly briefed me, because I think I'm right in
23		saying that there was not a Post Office team within the
24		Department at that point, and so I assume that came from
25		them.
		122
1		Permanent Secretary, to give me a weekly report, just to
2		me, of anything on their mind, and one of them came from
3		Mark Russell, who was the Chief Executive and,
4		therefore, the equivalent of the DG of UKGI.
5		And so, each week, I would get what was on his mind
6		through that directly, but most of the detailed
7		submissions and contact would have been with the Post
8		Office Minister.
9	Q.	Irrespective of individual personalities, is there
10		a tension between representing Government at the Post
11		Office and also acting as a voice/guide for the Post

- 11 Office and also acting as a voice/guide for the Post
- 12 Office within Government?
- 13 **A.** I think there is a tension in many respects that we may
- 14 come on to talk about in more detail. I actually think
- 15 there is a structural tension and, arguably, at least in
- 16 the view of the Department, something of a legal
- 17 tension, in that, in a fiduciary board, the
- 18 responsibility of a director, and the UKGI director was,
- 19 as it were, a fully fledged the director of the
- 20 organisation, there is a kind of unitary responsibility
- 21 to the company and, in particular, my understanding, and
- 22 certainly it's consistent with advice during this
- 23 period, was that, in terms of the Department, and indeed
- 24 the Government, directing or influencing the Board
- 25 through that director, that that was a perilous thing to 124

1		do, that it was something known as the shadow director
2		risk, in which if you if, from the outside, whether
3		collectively or through an individual, you directed the
4		Board's decision, then you could be counted as
5		a director yourself.
6		In my view I'm sure we'll come on to talk about
7		this rather than seek to dance around that I think it
8		would have been better for it to be perfectly legitimate
9		for ministers and officials in the Department to input
10		directly without any of these this kind of tiptoeing
11		around, to the decision making of the Board. But no, it
12		was constituted that way, and that's how it was at the
13		time.
14	Q.	Moving down to policy areas, it says:
15		"Government's policy on the Post Office is to set
16		the parameters within which we expect it to operate
17		(reach of network, types of services it should seek to
18		offer) and then allow the business to operate
19		commercially, at arm's length from Government. [Post
20		Office] is a public corporation with a fiduciary Board
21		Operational decisions are made by the CEO, Paula
22		Vennells, and her team, supported by the Board. CFO
23		Al Cameron, who are meeting, is the other Executive on
24		the Board."
25		That's another thing that we've heard quite a bit
		125
		125
1	Q.	125 Thank you. It seems there that you were going to be
1 2	Q.	
	Q.	Thank you. It seems there that you were going to be
2	Q. A.	Thank you. It seems there that you were going to be meeting with the CFO, Al Cameron; do you recall
2 3		Thank you. It seems there that you were going to be meeting with the CFO, Al Cameron; do you recall a meeting with Mr Cameron?
2 3 4		Thank you. It seems there that you were going to be meeting with the CFO, Al Cameron; do you recall a meeting with Mr Cameron? I do recall meeting with Mr Cameron and, indeed, other
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2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	A. Q.	Thank you. It seems there that you were going to be meeting with the CFO, Al Cameron; do you recall a meeting with Mr Cameron? I do recall meeting with Mr Cameron and, indeed, other executives throughout my period in office. What has been a bit frustrating, and I think other witnesses including Sir Vince this morning have said, is that, for reasons I don't understand, the Department don't have access to whether they don't have at all ministerial diaries and minutes of meetings. That is that surprises me and disappoints me. So, in a three-year tenure, meeting literally thousands of people a year, I'm unable to say how often and when, but certainly I met Mr Cameron and I probably, from this, I met him shortly after this note was sent. If we scroll down, we can see various headings, we have "Ownership", "Services and Long-Term strategy", "Network" if we keep on scrolling at the bottom of the next page, "Pensions", "Cash supply chain", "Industrial relations", then we come to "Other issues". Yes.

subpostmasters regarding the [Post Office's] Horizon II
 (point of sale) system, an investigation was undertaken

127

- 1 about: operational decisions.
- 2 A. Yes.

3

25

- Q. Was that something that could be easily separated out,
- when it came to, for example, matters relating tosubpostmasters?
- 6 A. Well, I think -- as other witnesses have said, I think
- 7 there is no bright line, certainly there is no
- 8 definition that sets this out. The view of the
- 9 Department -- the inherited view across different
- 10 administrations of different parties -- was that
- 11 certainly what counted as operational included matters
- 12 like IT systems and the relationship with the
- 13 subpostmasters and, therefore, that was definitely in
- 14 that category. Things that were strategic, or obviously
- 15 was Government requirement on how many post offices were
- 16 to be there. But, clearly, and no doubt we'll come on
- 17 to talk about this, within the middle, there are
- 18 questions as to when operational matters become
- 19 strategic or certainly kind of proper for ministers, and
- 20 my view, as set out in my witness statement, is that
- 21 I think in certain government-owned organisations, of
- 22 which Post Office Limited is one, I think there is
- a greater likelihood of that to happen than in some
- 24 others, for example Lloyds Bank, when it was owned by --

at least in part by the taxpayer. 126

- 1 by an independent firm, Second Sight, over two years. 2 Whilst this received relatively high profile press 3 attention no systemic issue with Horizon has been found. 4 However, affected subpostmasters continue to put 5 pressure on [the Post Office], the Criminal Cases Review 6 Commission are considering some cases where individuals 7 have received criminal convictions, and group civil 8 litigation is being launched against [the Post Office] 9 in the High Court." 10 It seems as though that is the only mention of Horizon related issues within this brief; is that right? 11 12 Α. It is, yes. 13 Q. Do you consider that brief to be sufficient? 14 Α. Well, it contains, in my view, the crucial information 15 which is in that last sentence, I think it is, that the Criminal Cases Review Commission are considering some 16 17 cases, by implication the safety of the convictions, and that litigation is about to begin in the High Court. 18 That was -- that communicated what I thought was the 19 20 essential information on that. 21 Q. Did it give you, for example, an idea of the scale of 22 the Group Litigation? 23 A. No, it didn't, clearly. 24 Q. It begins by saying that there were complaints from
- 25 a small number of subpostmasters --

¹²⁸

A.

before or after.

4		Vez
1 2		Yes.
2	Q.	regarding Horizon IT systems. Now, looking at it, do
3 4		you consider this summary to be an accurate and fair summary?
4 5	A.	
6	А.	Well, certainly it wasn't a small number. I think, if
7		I were to be fair to the authors, I think the number of
, 8		subpostmasters that were part of the group civil litigation increased. I think it started off not small
9		but, you know, smaller than it ended up and that grew
9 10		over time. But, in some ways, the number was not the
10		most important point. It is an important point,
12		certainly, but I didn't think it was the most important
13		point because the most important point is that people
14		are talking about criminal convictions that are in front
15		of the CCRC.
16		My view is, and bearing in mind that I was working
17		with a constituent who was absolutely sort of an example
18		of this, if she'd been the only one, that would be
19		enough.
20	Q.	It refers there to Second Sight investigation and no
21	_ .	systemic issue with Horizon has been found. Were you
22		aware, for example, that Second Sight had produced
23		a report which identified two bugs that they went into
24		detail on, and a further bug?
25	Α.	I wasn't aware of that.
		129
1		determination, the discovery of the truth about this,
1 2		determination, the discovery of the truth about this, was taking place through that process.
2		was taking place through that process.
2 3		was taking place through that process. So, in that sense, I think it was proper that the
2 3 4		was taking place through that process. So, in that sense, I think it was proper that the court was, you know, sitting, in some cases daily, to
2 3 4 5	Q.	was taking place through that process. So, in that sense, I think it was proper that the court was, you know, sitting, in some cases daily, to examine that, and so the updates, when it came to
2 3 4 5 6	Q. A.	was taking place through that process. So, in that sense, I think it was proper that the court was, you know, sitting, in some cases daily, to examine that, and so the updates, when it came to Horizon, were on the progress of the litigation.
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2 3 4 5 6 7 8 9	A. Q. A.	 was taking place through that process. So, in that sense, I think it was proper that the court was, you know, sitting, in some cases daily, to examine that, and so the updates, when it came to Horizon, were on the progress of the litigation. So the courts had charge of the matter? Yes You were being updated about and the CCRC.
2 3 4 5 6 7 8 9 10 11	А. Q. А. Q.	 was taking place through that process. So, in that sense, I think it was proper that the court was, you know, sitting, in some cases daily, to examine that, and so the updates, when it came to Horizon, were on the progress of the litigation. So the courts had charge of the matter? Yes You were being updated about and the CCRC. and you were being updated about their progress.
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2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	A. Q. Q. A. Q.	 was taking place through that process. So, in that sense, I think it was proper that the court was, you know, sitting, in some cases daily, to examine that, and so the updates, when it came to Horizon, were on the progress of the litigation. So the courts had charge of the matter? Yes You were being updated about and the CCRC. and you were being updated about their progress. Yes. But looking at this, this one paragraph, plus the weekly briefings you've looked at, do you think that was sufficient in relation to the overall picture of problems with the Horizon system? Well, I describe in my witness statement as "this period" being a period, I think as I described it, between two times and what I mean by that is that up until, I think, 2015 prosecutions were being made of subpostmasters. They had come to an end. The legal processes had commenced both the CCRC, I think, had commenced the year before, and the Group Litigation had

1	Q.	Were you aware at this stage of any concerns about
2		an expert witness who had appeared in a criminal case or
3		criminal cases?
4	Α.	I certainly was not.
5	Q.	You, in your witness statement it's paragraph 36, you
6		say that you've re-read all 150 or so weekly updates
7	Α.	Yes.
8	Q.	that were provided to you while you were Secretary of
9		State and there's minimal reference in there to issues
10		relating to Horizon.
11	Α.	Referring to the lit to Horizon, yes, and it was
12		through the lens of the litigation, essentially, it was
13		an update on that.
14	Q.	We'll come to examples and to detail but do you think
15		you were sufficiently briefed in relation to matters
16		relating to Horizon?
17	Α.	Well, were it not for the fact that these cases were
18		before the courts, what I say in my witness statement is
19		that view of the Department, and you may ask me about,
20		as it were, my own view of this, the view of the deposit
21		were that these matters were, essentially, sub judice

and were perhaps not technically so, but they were being

one with the Criminal Cases Review Commission and the

So this was a time of limbo, in some sense, between the entered of the Post Office making -- taking forward

prosecutions but before the opinion of the courts, High

So the role of the Government, I would say, in

resolving those problems, was -- and certainly sort of

mounting prosecutions -- was not the same as it was

Q. Could we please turn to POL00117715, please. On becoming Secretary of State you received a letter from

Paula Vennells. That's 25 July 2016. If we scroll

scroll down, we can see the significant strides in

over the page, please, it says:

down, she congratulates you on your appointment. If we

modernising the network that she refers to and, if we go

"We are therefore developing a new strategy to

2020/21 designed to strengthen our market position,

improve our digital capabilities and radically reduce our operating costs. While this will require investment

complete the commercial turnaround of the Post Office

to execute, it provides an historic opportunity to

and put the network on a self-sustaining footing."

Do you recall receiving this letter?

I don't recall it but I'm sure I did.

Court, and the Court of Appeal had been issued.

tested in two judicial forums, if I can put it that way:

other in the High Court and, therefore, the 130

Q. There's no mention in this letter of Horizon issues?

(33) Pages 129 - 132

1	Α.	Indeed.
2	Q.	Do you recall, in your early time as Secretary of State,
3		or even thereafter, discussing Horizon issues with Paula
4		Vennells?
5	Α.	I don't have any recollection of that.
6	Q.	How about Al Cameron, who you met perhaps more
7		regularly?
8	Α.	I can't remember that but, again, I would say that the
9		litigation and the Court of Appeal, the CCRC, they were
10		the most important parts of that. And as I say, the
11		view was that these were effectively being determined in
12		court, rather than between ministers and the Post Office
13		at that stage.
14	Q.	You say the view, that was of those who advised you; was
15		that your view as well?
16	Α.	Well, so, going back to your first questions to me,
17		Mr Blake, I had an insight into this through one
18		particular constituent and it led me, I think, that
19		correspondence and there's others we might have
20		looked at that I didn't trust the management of the
21		Post Office, to be frank. So take that unilateral
22		refusal of to Mrs Thomson to have her case
23		arbitrated, despite the fact that the panel, whatever it
24		was, recommended it that led me to suspect that the
25		current management of the Post Office were not to be
		133
1		a person of sort of blameless character, had been
2		treated in this way, not just charged and convicted, but
2 3		treated in this way, not just charged and convicted, but subsequently been treated in this predatory way by the
2 3 4		treated in this way, not just charged and convicted, but subsequently been treated in this predatory way by the Post Office. There are letters about demanding
2 3 4 5		treated in this way, not just charged and convicted, but subsequently been treated in this predatory way by the Post Office. There are letters about demanding repayment of funds even after she was sentenced.
2 3 4 5 6		treated in this way, not just charged and convicted, but subsequently been treated in this predatory way by the Post Office. There are letters about demanding repayment of funds even after she was sentenced. I was very keen that the courts would determine the
2 3 4 5 6 7		treated in this way, not just charged and convicted, but subsequently been treated in this predatory way by the Post Office. There are letters about demanding repayment of funds even after she was sentenced. I was very keen that the courts would determine the truth here, rather than relying on the Post Office.
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1		trusted to resolve some of these questions.
2		So the view of the Department, as I say, the
3		inherited view that Horizon IT systems, contracts with
4		subpostmasters, et cetera, were kind of operational, and
5		therefore, litigation around it was for the Post Office
6		itself. My view was to welcome the fact that court was
7		going to look at this, the High Court in particular.
8		I thought the authority of a High Court judge, and the
9		requirements of disclosure and all the rest of the
10		things, was a better way of resolving this than, as it
11		were, a process that involved the Post Office any
12		kind of arbitration with the management of the Post
12		Office.
13	~	
	Q.	So pausing there at, say, 2016, who, if anybody, did you think should have been providing you with more
15		1 07
16		information about the Horizon system, or is it your
17		evidence that, in fact, you are satisfied with the level
18		of information you were being given at that time?
19	Α.	I would say that what I was I was relieved that the
20		High Court and the CCRC were, with the powers available
21		to them, going to determine the truth about what went
22		on. I had no evidence to think that the or to know
23		that the Post Office were behaving improperly but,
24		certainly, the experience of a constituent, who I should
25		any was a wall respected person in the community was
		say was a well-respected person in the community, was
		134 134
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		134
1		134 including its geographic reach and the key services it
1 2		134 including its geographic reach and the key services it offers and then allows the Post Office to operate as
1 2 3		134 including its geographic reach and the key services it offers and then allows the Post Office to operate as an independent commercial organisation within those parameters. As such, we do not play a direct role in the day-to-day responsibilities of the company, and this
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which they have to take disciplinary action against

24

25 either an employee or, in this case, someone that it has 136

1		a contractual relationship with, whether that's, you
2		know, a retail group, whether it's a corporation. So
3		leaving aside whether they should have the power to
4		prosecute themselves, the fact of people being
5		prosecuted, I don't think is necessarily a strategic
6		thing.
7		Whether I mean, what clearly does make it
8		strategic is whether those prosecutions were mounted in
9		a way that was, I'm afraid, corrupt and we now know,
10		from what has been disclosed, that the Post Office was
11		in receipt of information that at least one of its
12		witnesses, during those trials, was unreliable and,
13		certainly, I'm not sure of the timing, whether people,
14		once they knew it, were continuing to be prosecuted,
15		despite the knowledge of that. But, certainly, the case
16		that people that had been prosecuted had to live their
17		lives as convicted people because of it.
18		Now, that not only raises it to the level of
19		strategic, it raises it to the level of being totally
20		unconscionable. So from the spectrum of, you know, one
21		or two people in a large organisation being prosecuted
22		for misdemeanours from time to time, to what seems to be
23		the case, that at least in some parts of the management
24		of the Post Office, people were prosecuted, in some
25		cases jailed, in some cases people lost their lives, on 137
		137
1		response to Ms Shaikh, this time February 2018. It
2		says:
3		"Thank you for your email of 13 January 2018 to Greg
4		Clark MP about Farncombe Post Office."
5		If we scroll down, very similar terms towards the
6		bottom."
7	Α.	Yes.
8	Q.	Again, same number referred to there, it's used over
9		11,600 branches, et cetera, and this one was sent by
10		Stephen Clarke of UKGI. Was he somebody that you worked
11		with?
12	Α.	I can't remember, I mostly dealt with Mark Russell who
13		was the head of the organisation but he may well have
14	_	been in meetings accompanying Mr Russell.
15	Q.	I want to turn now to the Common Issues judgment.
16	Α.	Can I just make a comment on that
17	Q.	Absolutely.
18	Α.	since you put it up? I think, looking back does
19	_	it say what date of the letter
20	Q.	If we scroll up, 13 January was the letter to you?
21	Α.	2018. Beginning of 2018. I think, if I look back, what
22		it would have been better to have said is what I've just
23		said to you: that actually these matters are being
24		tested by the High Court and we and will be
25		determined shortly.
		1.17

1		the basis of information that we now know, and was known
2		to them, to be wrong, is of a whole different order.
3	Q.	If we look at the final paragraph there, it says:
4		"The Post Office have also assured me that they are
5		confident that their Horizon system is robust and
6		reliable. It is used by over 11,600 branches for
7		numerous services every day and has been for a number of
8		years. It is right that the Post Office should
9		investigate these sorts of instances thoroughly given it
10		is charged with overseeing substantial amounts of public
11		and third party funds."
12		Were you aware of these kinds of stock lines being
13		sent out to people who wrote to either yourself or to
14		your ministers?
15	Α.	I can't remember but it wouldn't surprise me. They
16		were, as you say, standard lines that had, I think,
17		prevailed for many years under different
18		administrations.
19		I if I saw this, I would have regard it as, in
20		effect, a holding line. It says, "The Post Office have
21		also assured me". It comes from Margot James but it
22		says "The Post Office have assured me". I wanted to see
23		the Post Office's assurances tested rigorously in court,
24		and that's what was going on during this time.
25	Q.	Can we turn, please, to UKGI00007733. This another
20	.	138
1	Q.	Thank you. I'm going to move to the Common Issues
2	Q.	judgment, the judgment itself was 5 March 2019.
2		It seems, certainly from the paperwork that we have,
4		that Horizon didn't really feature very much in your
5		briefings between 2016 and March 2019; is that a fair
6 7	•	summary?
7	Α.	Well, only to the extent that it was before the High
8 9		Court, it was obviously until the judgment was issued.
		That was where, as it were, the action was, and there
10		were updates on that. The Post Office Minister at the
11		time, I think, got a regular update. I say in my
12		witness statement that there was some reluctance even to
13		give those factual updates of what was going on, but
14		that's not to say that I didn't regard that court
15		process, as I hope is evident, as being very important,
16		and the respective judgment as being important, because,
17		before we get to that judgment, you will see from my
18		witness statement that I took steps to, as it were, to
19		prepare for the receipt of that judgment, even to the
20		point of asking whether the Government Business
21		Department could have early sight of that judgment.
22		I was advised that this was not possible because we

weren't a party to the litigation.

I was advised that this was not possible because we

I asked the Permanent Secretary, outside the UKGI process, to advise me and the then Post Office Minister

1		in anticipation of the judgment as to what his	1		"Yo
2		assessment of how we should handle it was. So this	2		permiss
3		throughout it I'd regarded this court process as being	- 3		sight of
4		extremely important and, therefore, the judgment I had	4	Α.	Yeah.
5		no idea what it was going to say, but I was looking	5	Q.	If we sc
6		forward to it, shall we say.	6		We can
7	Q.	Can we turn to the advice in relation to the draft	7		"Re
8		judgment. That can be found at UKGI00009076. This is	8		expect
9		a ministerial submission to you of 1 March 2019, and we	9		aspects
10		see there you are noted there "To Note".	10		treatme
11	Α.	Yes.	11		relate to
12	Q.	Do you know who drafted this? There are a number of	12		[the Pos
13		names there?	13		operatio
14	Α.	I assume from deciphering the norms on these things,	14		Did
15		that Tom Aldred, who was marked as the Lead Official,	15		current
16		I assume that he would have drafted it, but that it	16	Α.	Yes, I
17		would have been approved by Mark Russell. In fact	17		l don't k
18		I required that Directors General approve statements	18		constitu
19		like this.	19		that the
20	Q.	Thank you. It is headed "Judgment in Post Office Common	20		to and o
21		Issues Trial", and it says:	21		subpos
22		"A judgment in the Common Issues trial will be sent	22	Q.	Paragra
23		to the parties next week"	23		"W
24		If we scroll down, there's some advice. It says on	24		by [Her
25		paragraph 5:	25		an inde
		141			
1		relationship with its subpostmasters and the management	1		a partic
2		of its IT systems are operational matters for Post	2	Α.	Well, it
3		Office Limited."	3		over ma
4		So again, reference to operational matters:	4		was the
5		"The legal defence and the costs involved are being	5		and sub
6		handled by them."	6		therefor
7		If we scroll down and over to page 3, please.	7		My
8		Paragraph 14 says:	8		judgme
9		"[Your Department's] Legal and UKGI legal advisers	9		did, tha
10		have consulted relevant [Government Legal Department]	10		it had, t
11		litigation advisers and advise that such an application	11		So he is
12		is highly unlikely to be successful."	12		In my o
13		So it's unlikely to be successful if you did apply	13		judgme
14		to see the judgment in advance.	14		operatio
15		Then at paragraph 15:	15	Q.	Then at
16		"As well as being unlikely to receive permission,	16		"Th
17		the application for permission and the judge's response	17		seek pe
18		will be made public. An application would run counter	18		UKGI w
19		to the position the Department has taken thus far	19		ensure
20		regarding this litigation (including in Parliamentary	20		the judg
20			21		Ca
20		Questions), namely that it is an operational matter for	21		ou
		Questions), namely that it is an operational matter for [the Post Office]."	22		this is a
21					this is a now. T
21 22		[the Post Office]."	22		this is a

1		"You have asked for advice on whether we should seek
2		permission from the judge for ministers to have advanced
3		sight of the judgment."
4	Α.	Yeah.
5	Q.	If we scroll down and over the page to page 2, please.
6		We can see at paragraph 10, it says:
7		"Regardless of the legal findings, Post Office
8		expect the judge to continue to be critical of some
9		aspects of Post Office's handling of the case and its
10		treatment of claimants. We expect these largely to
11		relate to historic behaviour and do not believe that
12		[the Post Office] currently has problems with its
13		operational culture."
14		Did you have at this stage any views as to the
15		current operational culture at the Post Office?
16	Α.	Yes, I my views of the well, whether it's current,
17		I don't know. Drawing from my experience with my
18		constituent, I am minded to think, inclined to think
19		that the management of the Post Office was insensitive
20		to and dismissive to the point of abject rudeness to
21		subpostmasters.
22	Q.	Paragraph 11:
23		"While [Post Office Limited] is 100 per cent owned
24		by [Her Majesty's Government], it operates as
25		an independent, commercial business. As such, the
		142
1		a particular position?
2	Α.	Well, it was the longstanding position of the Department
3		over many years, over different administrations, that it
4		was the case that the contract between the Post Office
5		and subpostmasters and IT systems were operational and,
6		therefore, litigation around it was also operational.
7		My view was that that was entirely dependent on the
8		judgment of the court and, were the court to find, as it
9		did, that the Post Office had behaved as disreputably as
10		it had, then that marked it very firmly as strategic.
11		So he is reporting or repeating the inherited line.
12		In my own mind, I was very clear that the this
13		judgment was going to determine whether this was
14		operational or strategic.
15	Q.	Then at paragraph 16:
16		"Therefore, we advise that the Minister does not
17		seek permission to have early sight of the judgment.
18		UKGI will work with BEIS communications and with POL to
19		ensure that appropriate responses are made as soon as
20		the judgment is out."
21		Can we please turn to UKGI00009137, please. And
22		this is a further submission a few days later, 5 March,
23		now. This is a submission from Alex Chisholm, the
24		Permanent Secretary, to you.
05		

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1	Q.	He says:	1		Kelly Tolhurst, who was then the Post Office Minister.
2		"You asked me yesterday to look into some issues	2	Q.	It says:
3		relating to the Post Office and to advise both you and	3		"The two most pressing issues relate to the court
4		Kelly on the way ahead."	4		case and the appointment of an interim Chief Executive
5		Do you recall the conversation that you had with	5		"
6		Mr Chisholm at	6		Then in relation to litigation, he says:
7	Α.	Not in detail but I recall enough about it to be able to	7		"I agree with the legal and policy advice that we
8		make some observations, if I may?	8		should not seek permission to see the judgment in
9	Q.	Yes, please.	9		advance of it being made public, and not comment when it
10	Α.	So the timings you say, I think it was shortly after	10		is published. To obtain an advance copy we would need
11		that submission that we've just looked at. My view was	11		to satisfy the judge that there was a clear public
12		that the result of this court case, which I regard as	12		interest in such. This is difficult in any case but
13		important, was about to come out. I had a notion that	13		especially in one such as this where there are no
14		this would be significant, and I didn't entirely	14		immediate consequences, and we have presented the trial
15		trust is the wrong word. I wanted a different view to	15		as being an operational matter for the Post Office."
16		the UKGI view, which we saw in the last submission. So	16		That comes up back to the same point I was making
17		in the weekly meeting I had a meeting one to one with	17		before as to the use of the word "operational" to
18		the Permanent Secretary every week, normally every	18		perhaps distance the Department from it.
19		Monday morning, and I said, "You give me, Alex, your own	19	Α.	Yeah.
20		view of this, write to me separately", and it's why	20	Q.	Is that something you would agree with, that it was, to
21		I think he describes it as a kind of personal minute or	21		some extent used, for purposes?
22		something like that.	22	Α.	Well, it's hard to know what was in the Permanent
23		It's not a submission, which tend to be kind of	23		Secretary's mind when he wrote that. My own view was
24		agreed across the Department by sort of multiple people.	24		that the court case and the judgment would determine
25		This was direct from the Permanent Secretary to me and	25		whether this was an arm's-length matter or something
		145			146
1		that was directly for the Department. It may be that he	1		paragraph 1 about the early sight of the judgment and
2		took that view, it may not be. So I think it would be	2		suchlike, that was a kind of second opinion that I'd
3		unfair for me to read into his mind on that.	3		sought on the UKGI advice. That's just in summary.
4	Q.	Thank you. It then says:	4	Q.	That was broadly consistent
5		"This is only the first of four trials scheduled to	5	A.	He was effectively supporting the advice of UKGI on
6		continue until at least March 2020, and the final	6		that.
7		outcome will not be clear until they have all completed.	7	Q.	
8		Ministers will want to keep an appropriate distance from	8	_ .	proceedings uncovered some faults on both sides"
9		the trial and not comment directly while it is <i>sub</i>	9	Α.	
10		<i>judice</i> ", which is the point that you made.	10		also that we shouldn't seek the key issue to hand was
11	Α.	Indeed.	11		whether the Department, rather than UKGI, who were
12	Q.	"([The Post Office] may wish to appeal if the judgment	12		getting it anyway, should try to obtain the judgment in
13	-	goes against them). Personally I would not be surprised	13		advance, and UKGI said you shouldn't because there's no
14		if the proceedings uncovered some faults on both sides	14		precedent for this ever happening for a shareholder, and
15		of the litigation. Hence it would be especially	15		the Permanent Secretary agreed. So, on that basis,
16		advisable to stay above the fray for now, leaving you	16		I think we didn't apply.
17		free to speak and act as necessary and in the public	17	Q.	At this point, was there a difference in view that you
18		interest once the matter is decided."	18	-	could sense between the Permanent Secretary and UKGI in
19		He then addresses the position of the interim CEO,	19		relation to where the fault may lie?
20		and is satisfied that Al Cameron is the right person for	20	Α.	-
21		that particular job.	21		difference at that stage, not to say that there wasn't
	Α.	Yeah.	22		any, but I don't recall it. Although I think the fact
22		Moving now to the judgment, so the judgment was	23		that I went to the Permanent Secretary and asked him to
22 23	Q.				
23	Q.	15 March			
	Q. A.		24 25		give advice, as it were, on UKGI's advice, I'm sure, in my mind, was that the Permanent Secretary was not, as it

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1	were, wholly on the same page in general as UKGI.	1		Chairman, commissioned by a silk and his assistant on
2	If I'd known him to have the identical view, there'd	2		that. There'd been all sorts of things done internally
3	have been no point going to him in the first place but	3		but this was the first time, since those convictions
4	I didn't, and it was direct and personal to him.	4		were made, that a court had opined on it.
5 Q .	Thank you. That can come down.	5		It was so that was, as it were, it was seminal in
6	The judgment was 15 March, paragraph 51 of your	6		anticipation. It was seminal in terms of its content,
7	witness statement, you described it as seminal.	7		because the judge was very clear the subpostmasters and
8 A .	Yes.	8		mistresses were right, and that the Post Office had
9 Q .	Can you briefly assist us with why you considered it to	9		behaved disreputably, as I think I describe it, and to
10	be seminal?	10		the considerable detriment of the claimants.
11 A .	Well, it was seminal, as I set out in my witness	11	Q.	Can we please turn to UKGI00009213. There was a meeting
12	statement for in a number of respects. I mean, first	12		on 16 March. If we could scroll down on this page,
13	is that this was a long-awaited verdict, after a long	13		please, at the bottom of the page we can see is this
14	period of litigation, perhaps too long, and the parties	14		is an email from your private office?
15	to it, the subpostmasters and mistresses, wanted to see	15	Α.	Yes, "Clark MPST" is my private office.
16	it. So but that's probably the most trivial sense in	16	Q.	"All,
17	which it was seminal.	17		"Thanks for joining the call this morning. A quick
18	It was seminal in another sense, in which it is the	18		readout below with actions."
19	first time, in my recollection or in my view, that	19		So it seems as though there was a call with a number
20	a court, a court of the land, had opined on this	20		of participants, if we scroll down we can see who
21	question of justice for subpostmasters and mistresses	21		attended.
22	since the individual court that had handed down criminal	22	Α.	Can I just describe the context of that?
23	convictions. There'd been, you know, arbitrations that	23	Q.	Absolutely, please do.
24	had gone nowhere, there'd been, by now discovered but	24	Α.	So the judgment was handed down on a Friday afternoon a
25	didn't know at the time, a review by the Post Office	25		a time when I was in my constituency with engagements,
1	and, that evening I had an important commitment,	1		that the judgment was close to the worst-case scenario."
2	an irrevocable commitment in my constituency, but	2		There's some detail there from Tom Cooper.
3	I wanted to have a meeting to discuss the judgment, so	3		It then says:
4	we did, at the first opportunity, which in this minutes,	4		"[Secretary of State] asked about the prospect of
5	this readout, is 9.45 in the morning, so I assume it	5		an appeal by [the Post Office]. Tom Cooper discussed
6	would have been 8.30 or something like that on the	6		the legal advice received by the Post Office. This
7	Saturday morning.	7		advice will require careful consideration. Tom
8 Q .		8		indicated that there are both legal and tactical reasons
9	who these participants are?	9		for the Post Office to appeal and that it is most likely
	Yes, SoS, obviously me, Secretary of State; Kelly	10		they will do so. Appealing may be [unhelpful] in
11	Tolhurst was Post Office Minister at the time; Will	11		reaching a settlement."
12	Holloway and Jacob Willmer were my inter-department	12	Α.	"May be helpful".
13	Special Advisers; Gavin Lambert was, by then, the	13	Q.	I was going to say, just pausing there, can you assist
14	Director General, that's to say one below the Permanent	14		us with the discussion regarding legal and tactical
15	Secretary with responsibility for this area of policy;	15		reasons?
16	Tom Cooper was the UKGI representative on the Board of	16	Α.	So I was incensed by that remark. It seemed to me that
17	the Post Office; Tom Cartlidge was one of my private	17		this was a very important judgment that was strongly
18	secretaries, the duty private secretary it wasn't, as	18		critical of the postmaster of the post office, and
19	I recall, his specialism but it was Saturday morning,	19		supportive of the subpostmasters, and it was instantly
20	and he obviously had drawn the short straw to be on duty	20		evident that that needed to be accepted and acted upon.
21	that weekend; and Hibaq Said, I assume it says "PS"	21		And what really stung me was the use of the word
22	on there, it must be Kelly Tolhurst's private secretary.	22		"tactical" in this:
23 Q .	If we scroll down to the detail, it says as follows:	23		" there are tactical reasons to appeal
24	"Kelly brought [the Secretary of State] up to date	24		and that it is most likely that they will do so."
25	on the judgment against [the Post Office], indicating 151	25		That suggested to me that this wasn't because there 152

1		was something unclear in the judgment. It wasn't that
2		there was some kind of area of law that needed to be
3		clarified or some material fact that was wrong. But
4		that it was, I could well, at least I inferred that
5		this was, in effect, to disadvantage to the
6		subpostmasters and their litigation, which should not
7		have been in anyone's mind.
8	Q.	There aren't speech marks around the word "tactical", is
9		that something you actually remember from this meeting
10		being mentioned?
11	Α.	Well, tactical, I assume, was mentioned because it's
12		a very specific word, and it's I mean, the fact that
13		it says I mean the private secretary is was a very
14		experienced private secretary. He captures two aspects,
15		both legal and tactical. So it was clearly pointing to
16		something other than the legal. And I mean, I say in
17		my witness statement that my reaction may have been
18		unfair, it might have done an injustice and perhaps it
19		wasn't intended in the way that I interpreted it.
20		But all I can tell you, and what I recall, is that
21		I took that as meaning that they there was
22		an intention to play it was a pretty appalling
23		thought a kind of legal game with this rather than to
24		respect the judgment.
25	Q.	It then says:
		153
1		angry about it and, in terms of making clear, I don't
2		think I would have said, you know, "Let me tell you my
2 3		
3		primary objective is to see justice done". I think

- primary objective is to see justice done". I think
 I would have said -- did say, "my only objective" and
- 5 that's how it should be read.
- 6 **Q.** It then continues:

-		
7		"Where postmasters and mistresses have been treated
8		improperly they should be treated justly. It will be
9		necessary to consider the legal advice carefully to
10		ensure no activity by [your Department] will prejudice
11		any appeal.
12		"[The Secretary of State] and Kelly discussed the
13		possibility of making a statement. [Secretary of State]
14		resolved not to make a proactive statement. He asked
15		that an [Urgent Question] rebuttal be prepared for
16		Monday morning. He also asked that the Department put
17		at a statement making the point that we are aligned with
18		the interests of the postmasters but that we are still
19		going through the legal process."
20		Do you recall if that statement went out or not?
21	Α.	Yes, it was a I think in the evidence that was
22		disclosed, there was a written ministerial statement
23		that I think was issued on the Monday morning.
24	Q.	So that's a written ministerial statement
25	Α.	Yes.
		165

	•	
1		"[The Secretary of State] made clear his primary
2		objective is to see justice done."
3		I think in your witness statement you've said that
4		that is a diplomatic way of putting it.
5	A.	So, for those that are not have the good fortune not
6		to be connoisseurs of kind of ministerial minutes and
7		readouts, there is a general understatement to what is
, 8		kind of recorded in this. But there is a kind of code
9		that I think people understand if they read it, and
10		whenever it says something like "Secretary of State made
11		clear", that means that I intervened with some force on
12		the issue. It's not "Secretary of State said" or
13		"Secretary of State observed" or "Secretary of State
14		suggested". "SOS made clear" is, if you take evidence
15		from other civil servants, I'm sure they will confirm,
16		that means something. That means that this was a pretty
17		emphatic.
18	Q.	Is that one level below "full and frank"?
19	A.	I think it's probably a level above. I think it
20		probably implies that I was pretty direct about it.
21	Q.	It then continues:
22		"Where postmasters"
23	Α.	Before you go on, can I have a quibble with this?
24	Q.	Yes.
25	Α.	I think I recall my demeanour on that call. I was quite
		154
1	Q.	when it refers to a statement?
2	Α.	Correct.
3	Q.	Yes. "We should also"
4	Α.	It was probably a press statement as well. Actually
5		I think I suspect it was both.
6	Q.	"We should also do a Dear Colleague letter promising to
7		revert to the House when the legal matters are
8		completed. It should be robust in tone and making clear
9		that the litigation is ongoing and that [Her Majesty's
10		Government] will keep the House updated.
11		"[The Secretary of State] made clear that where [the
12		Post Office] can fix problems internally before the
13		conclusion of the legal process, it should do so."
14		It then says:
15		"He agreed with Tom Cooper's assertion that caution
16		would be required to ensure that justice is done for
17		legitimate claimants, but that restitution may not be
18		appropriate in all circumstances."
19		Now, I think you've said in your witness statement
20		that the reference to "your agreement" is, again, the
21	_	Civil Service speak of
22	Α.	So I think both of these are a little opaque. The first
23		sentence of that paragraph, "[Secretary of State] made

- 23 sentence of that paragraph, "[Secretary of State] made
- clear that where POL can fix problems internally beforethe conclusion of the legal process", my recollection is

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clearly isn't entitled to it, they shouldn't get it.

it is a Board decision we think that if [the Post

open the possibility that the Minister, after her discussion with Tim tomorrow, would want to say the

Office] decides to make the application it should leave

This is talking now about the recusal application.

So this is 19 March and it's a discussion about whether or not the Minister should have a say in the

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not controlling the case -- that is properly a matter

If we just scroll down, I will just read a few passages from the bottom of that email, it goes on to

Office] stands accused. But it is not obviously

"The Board will want to reflect carefully on all these matters. For my part I am satisfied that [the Post Office] Board is the right body to do this; and

and detached position, so that it is free and credible for dealing with the consequences as they unfold.

criticisms and may express a desire for [the Post Office] to act appropriately but should not comment substantively in ongoing litigation in which the department has a clear interest but no direct

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"The Department should maintain its clearly distinct

Ministers may want to show appropriate concern about the

If we scroll up, we can see that Mr Watson, Richard

mistaken or otherwise inappropriate.

that it has been properly advised.

involvement."

Watson, says:

"Proceeding with the appeal and recusal attempt, risks identifying the organisation's leadership today with the negative historic behaviours of which [the Post

for the Post Office and their advisers."

Q. "Legally the shareholder cannot force the Board not to make the application and our advice to the Minister is not to get involved but if she is adamant she does not want it made that may be a matter the Board will want to

on that aspect.

and he says:

A. It is.

consider."

A. That's right.

say:

decision to recuse

shareholder disagrees."

But I -- there's not much emphasis I would have placed

"Tom, I spoke again to BEIS Legal. While they agree

Q. Thank you. I'm going to turn to two related documents. Can we please turn to UKGI00009296, please. This is internal UKGI correspondence. If we scroll down, we can see an email there from Richard Watson to Tom Cooper,

1	I told them to get on with giving restitution to	1
2	postmasters and mistresses. There was enough in the	2
3	Common Issues judgment to for that to be any	3
4	initiated.	4
5	They'd waited long enough and they shouldn't, as it	5
6	were, wait for the conclusion of the process. They	6
7	should get on with it.	7
8	To this last point, so Tom Cooper so and	8
9	I think I infer from the last sentence that, in the	9
10	sentence before, that they should give restitution to	10
11	the postmasters and mistresses, I think I said	11
12	comprehensive restitution. They should all be put in	12
13	financially, at least, in the kind of position that they	13
14	should have been in, had this not taken place, to which	14
15	Tom Cooper clearly made an observation that I think has	15
16	been familiar from other evidence that the Inquiry has	16
17	taken, that, well, you know, there may be some people	17
18	that actually were convicted and were genuinely guilty	18
19	of criminal deeds, and it would be an abuse of public	19
20	money if they were compensated when they shouldn't be.	20
21	To be frank, I didn't have much patience with that.	21
22	I didn't think that was the import of the judgment.	22
23	I don't recall Mr Justice Fraser as having made a kind	23
24	of great play of that. But, you know, it's hard to	24
25	dissent from noting that, yes, of course, if someone	25
1	Q. If we scroll up, Mr Cooper responds:	1
2	"Really?"	2
3	Then Mr Watson said:	3
4	"Are you free to speak?"	4
5	There is a further correspondence on the same point,	5
6	if we turn the last document before the break to	6
7	UKGI00009308. Perhaps if we could start with the bottom	5 7
8	of page 3. We have, if we scroll up, Mr Chisholm's	8
9	view, as expressed to Mr Cooper, regarding recusal. He	9
10	says:	10
11	"I have now read all this legal advice.	11
12	"Personally I find Justice Fraser in this case (as	12
13	in the Magnox case) to be opinionated, exacting, and	13
14	rather inclined to personalise matters. But not (to my	14
15	layman's mind) obviously wrong or biased.	15
16	"I also share the concern that a recusal attempt	16
17	risks further antagonising him (if unsuccessful) and	17
18	also positioning [the Post Office] in public as	18
19	aggressive and in denial about its shortcomings (which	19
20	impression would be consistent with the judge's findings	20
21	to date).	21
22	, "However my personal view of the case formed from	22
23	a rapid perusal of the judgment and all the legal	23
24	commentary you've kindly provided does not matter as	24
25	(a) I am not a lawyer and, anyway (b) the Department is	25

¹⁵⁹

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1	"Thanks. Alex sums up my view perfectly."	1
2	If we scroll up, we have a further email, from	2
3	Mr Watson, that says:	3
4	"All	4
5	"Are we agreed that we should not try to engineer	5
6	a position today whereby if the Board decides to proceed	6
7	with recusal the Minister is given a chance to object,	7
8	ie some sort of conditional Board approval. As	8
9	shareholder, I don't consider she has the legal power to	9
10	prevent this even if it was an appropriate thing for her	10
11	to express a view on, which I think we agree it isn't	11
12	but instead is properly a matter for the Board.	12
13	"It is of course proper for the Minister to	13
14	understand [the Post Office's] decision and why their	14
15	position might have changed since her call with the	15
16	chair on the weekend. I understand that might be	16
17	subject of a call with the Minister later today."	17
18	Then Tom Cooper responds and he says:	18
19	"I have no intention of engineering such an outcome	19
20	of the Board meeting."	20
21	Finally, if we scroll on to the first page,	21
22	Mr Evans, who was Deputy Director, in BEIS Legal	22
23	Advisers, he says:	23
24	"Clearly the Minister should be given an opportunity	24
25	to understand [the Post Office's] decision but it is for	25
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1	the same as that. They were going to do it I think the	1
2	next morning.	2
3	From memory, I think I was either out of Parliament	3
4	or the Department, I suspect it was an evening, I was	4
5	probably speaking at some industry dinner somewhere. So	5
6	I don't have access to these things, unfortunately, from	6
7	my private office but I think that I called the	7
8	Permanent Secretary and asked him to get to the bottom	8
9	of this and to advise Kelly and the Board as to what we	9
10	could do about it, and I think that is why his advice	10
11	I note this email is 9.23 on the Tuesday evening, so it	11
12	to suggests that it's late at night.	12
13	If I may make a couple of observations on the	13
14	handling of this.	14
15	So the first is to say that I thought it was	15
16	outrageous that UKGI contrived to keep the unambiguous	16
17	view of ministers from the Post Office Board in making	17
18	the consideration of this. It was my view, it was Kelly	18
19	Tolhurst's view, even to the point and you had it in	19
20	the email that was up about looking for	20
21	an opportunity even for the Minister, once they'd made	21
22	their decision, and the strong legal advice from two	22
23	sets of legal advisers was that it had to be made by the	23
24	Board but, even after they'd made it, should it be for	24
25	recusal, we were minded to want to disassociate 163	25

1		the Board to decide whether to apply for a recusal (or
2		the variant described by Tom) guided by their officials
3		and counsel and there should not be a situation where
4		the Board takes a decision subject to endorsement or
5		otherwise by the Minister. This should be a decision
6		that is taken by the Board, on the merits of the
7		litigation advice."
8		Can you assist us with what your view was on the
9		recusal application at that point in time?
10	Α.	Yes. I think it's a very important episode because it
11		indicates that, notwithstanding the strength, and
12		I would say unambiguous nature of the view that I and
13		Kelly Tolhurst I should say, throughout this, the
14		Post Office Minister's view, from whom you heard earlier
15		this week, was identical to mine in this in every
16		conceivable respect, that the Post Office needed now to
17		accept the judgment, give restitution to subpostmasters,
18		and change their whole approach.
19		And yet, we discovered I only discovered, I think
20		it was on the Tuesday evening so that call was on the
21		Saturday morning on the Tuesday evening, I got a message
22		from Kelly Tolhurst asking to speak to me to say,
23		"You'll never guess what, they're now tying to recuse
24		the judge and I'm completely against it, as being
25		incompatible with what we said". My view, again, was
		162
1		aurachica from it at the time. And that evolution a chaut
1 2		ourselves from it at the time. And that exchange about,
2		you know, I'm not going to I can't remember what the
3 4		words were "I'm not going to engineer a situation that was possible"
4 5	Q.	"I have no intention of engineering such an outcome at
6	ч.	the Board meeting."
7	۸	I thought that was wrong and appalling.
, 8		In terms of the discussion at the Board, I haven't
9		seen perhaps the Inquiry has seen any kind of
10		verbatim account of what was discussed at the Board, but
11		the advice that Alex Chisholm as Permanent Secretary
12		gave on my request, it went to Tom Cooper, as to what he
13		could do and what he could say. Even though it was, to
14		my taste, a bit to on the one hand and on the other,
15		I would have preferred a more robust piece of advice,
16		saying ministers are strongly opposed.
17		Actually what he does say and you highlighted it
18		when you called up the document:
19		"Proceeding with the appeal and recusal attempt,
20		risks identifying the organisation's leadership today
21		with the negative historic behaviours of which POL
22		stands accused."
23		Then he says:
24		"The Board will want to reflect carefully on these
25		matters."
-		164

1	Now, in my view, that aspect of the Permanent	
2	Secretary's advice should have been put to the Board so	2
3	that they could consider that not only were ministers	3
4	strongly opposed to this, even accepting that it was	2
5	a decision for the Board but that the Permanent	Ę
6	Secretary had some apposite things to say on what they	6
7	should have in mind.	7
8	I'm not certain but it was the impression that	8
9	I've formed, is that there was a discussion in which	ę
10	forgive me, it's not clear to me whether Tom Cooper said	1
11	anything. He recused himself from the vote but whether	1
12	he did what was advised by the Permanent Secretary and	1
13	set these concerns out, in my view, he should have done.	1
14	MR BLAKE: Thank you.	1
15	Sir, that might be an appropriate moment to take our	1
16	mid-afternoon break.	1
17	SIR WYN WILLIAMS: Yes, certainly.	1
18	MS PRICE: Can we come back at 3.30, please?	1
19	SIR WYN WILLIAMS: By all means, fine.	1
20	(3.17 pm)	2
21	(A short break)	2
22 23	(3.30 pm) MR BLAKE: Thank you, sir. Can you see and hear me?	2
23 24	MR BLAKE: Thank you, sir. Can you see and hear me? SIR WYN WILLIAMS: Yes, thank you.	2 2
24 25	MR BLAKE: Can we turn to BEIS0000070. Sticking with the	2
25	165	Z
4	Talkunst sallad maa oo tha Turaaday ayanian I think it	
1	Tolhurst called me on the Tuesday evening, I think it	
2 3	was. But I note I think, this thing into which I was copied would be the first I knew.	4
3 4	Q. We	· ·
5	A. The confirmation of it. That wasn't the first I knew	-
6	but this was the first kind of official submission.	é
7	Q. Thank you. If we scroll down, we can see it says:	-
8	"On 20 March, [the Post Office's] Board met to hear	8
9	legal opinion on the recusal application, and to take	ç
10	a decision on whether to proceed. Tom Cooper attended	1
11	as the shareholder's representative to the Board, but	1
12	following advice from UKGI Legal, he took no part in the	1
13	decision making."	1
14	Your Department ultimately would have been funding	1
15	this application; is that fair?	1
16	A. No, I don't think that's strictly right. So the Post	1
17	Office were funding the application. Now, of course,	1
18	the Government stood behind the Post Office and there's	1
19	a perfectly legitimate question you might go on to, is	1
20	again, how arm's length can that be? But, certainly,	2
21	throughout it, the Post Office, were and I think	2
22	the there's some evidence that the Permanent	2
23	Secretary reiterated that this had to come from the Post	2
24	Office's own resources.	2
25	So this wasn't, as it were, sort of coming to the	2
	167	

1		recusal application, this is a submission of 21 March
2		2019. The summary is that:
3		"Following independent legal advice, [the Post
4		Office] Board has approved an application to recuse the
5		judge. We expect this to be tabled today."
6		If we scroll down, please, it says:
7		"[Over] the weekend you spoke to the Secretary of
8		State and separately with the [Post Office Limited's]
9		Chair Tim Parker", so this isn't a ministerial
10		submission to yourself, although you are
11	Α.	It was to the Post Office Minister, I assume, is it?
12	Q.	Yes.
13		" and interim CEO-designate Al Cameron. [The
14		Post Office] informed you that they were taking
15		independent advice on whether to seek an application for
16		the judge to recuse himself from hearing the rest of the
17		litigation. At that stage, Tim thought if it unlikely
18		that an application would be taken forward. Following
19		these calls, on Monday, 18 March, you sent a Dear
20		Colleague letter to update MPs on events."
21		Were you aware that it was originally Tim Parker's
22		understanding that it was unlikely that there was going
23		to be an application for recusal?
24	Α.	Only from this, I didn't know that there was any thought
25		given whatsoever to a recusal application until Kelly
		given whatsoever to a recusal application until reliv
		166
1		
1 2		166
	Q.	166 Department to fund that, not that it makes it any more
2	Q.	166 Department to fund that, not that it makes it any more acceptable, in my view.
2 3	Q.	166 Department to fund that, not that it makes it any more acceptable, in my view. Is it right for the UKGI member of the Board not to
2 3 4	Q.	166 Department to fund that, not that it makes it any more acceptable, in my view. Is it right for the UKGI member of the Board not to vote, not to be part of that decision-making process, in
2 3 4 5	Q. A.	166 Department to fund that, not that it makes it any more acceptable, in my view. Is it right for the UKGI member of the Board not to vote, not to be part of that decision-making process, in light of the reasons you've already set out about the
2 3 4 5 6		166 Department to fund that, not that it makes it any more acceptable, in my view. Is it right for the UKGI member of the Board not to vote, not to be part of that decision-making process, in light of the reasons you've already set out about the relationship between Government and the Post Office?
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2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21		166 Department to fund that, not that it makes it any more acceptable, in my view. Is it right for the UKGI member of the Board not to vote, not to be part of that decision-making process, in light of the reasons you've already set out about the relationship between Government and the Post Office? Well, I've discovered quite a bit about this through this Inquiry and its disclosures. At the time, it was an evening call from the Post Office Minister and then a later night call to the Permanent Secretary. But what I understood and I recollect I'm sure accurately from my conversation with Kelly was that she was being essentially told, given strong legal advice, which is to say that, you know, you can't intervene in this, you can't make this decision yourself, and I discovered ex <i>jost</i> that it applied to Tom Cooper as well. Now, there is a very interesting thing here in the evidence that's been disclosed. Some of that advice, it seems to me from reading the to and fro, was advice from UKGI Legal, that's to say from lawyers, but it was essentially presentational advice, not a requirement of the law, shall we say, and, since that was summarised, I think possibly well, certainly in other
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22		166 Department to fund that, not that it makes it any more acceptable, in my view. Is it right for the UKGI member of the Board not to vote, not to be part of that decision-making process, in light of the reasons you've already set out about the relationship between Government and the Post Office? Well, I've discovered quite a bit about this through this Inquiry and its disclosures. At the time, it was an evening call from the Post Office Minister and then a later night call to the Permanent Secretary. But what I understood and I recollect I'm sure accurately from my conversation with Kelly was that she was being essentially told, given strong legal advice, which is to say that, you know, you can't intervene in this, you can't make this decision yourself, and I discovered ex <i>post</i> that it applied to Tom Cooper as well. Now, there is a very interesting thing here in the evidence that's been disclosed. Some of that advice, it seems to me from reading the to and fro, was advice from UKGI Legal, that's to say from lawyers, but it was essentially presentational advice, not a requirement of the law, shall we say, and, since that was summarised,

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1		You know, I'm not sure that it's the right thing for	1
2		presentational advice which, in any case, frankly,	2
3		should be a matter for others and the ministers for	3
4		that to be passed off as legal advice. And if there	4
5		were no legal bar on Mr Cooper taking part in that	5
6		decision, I was clearly I was certainly of the view	6
7		that he should have participated and should have spoken	7
8		against it.	8
9		As it happens, I could understand a genuine sort of	9
10		legal objection to, as it were, the Executive being	10
11		involved in a criticism of the judiciary, but that would	11
12		more apply, it seemed to me, if the Department, UKGI and	12
13		Mr Cooper were wanting the judge to be recused, which	13
14		whereas certainly the ministerial view, and I think	14
15		consistent with the reading between the lines of the	15
16		Permanent Secretary's view is: we didn't want that. We	16
17		wanted the opposite.	17
18	Q.	Thank you. Could we please turn to UKGI00009464.	18
19		So the submission I just took you to was 21 March.	19
20		A few days later now, 25 March, and you have received	20
21		correspondence from another member of the Department,	21
22		Anne-Marie Trevelyan, writing on behalf of	22
23		a constituent, Peter Holloway, and she discloses, if we	23
24		scroll over to page 3, please, an email from her	24
25		constituent. He says:	25
		169	
1		Joint Action and many have been forced into bankruptcy,	1
2		some sent to prison, all severely disadvantaged.	2
3		AND the Post Office has been, and is still, spending	3
4		millions of pounds of public money to defend its	4
5		entrenched position and the reputations of	5
6		an incompetent Executive and a Board that either doesn't	6
7		care or doesn't understand what is going on.	7
8		"Over the last ten years there have been three	8
9		enquiries all of which the Post Office refused to accept	9
10		their findings, an attempt at mediation, at which the	10
11		Post Office refused to mediate. It's time for the Post	11
12		Office to accept the true position and agree to settle	12
13		with us who have been so badly treated."	13
14		Is this correspondence you recall receiving; was it	14
15		sent directly to you?	15
16	Α.	It isn't and I don't expect I would have seen it for	16
17		reasons that Vince Cable, I think, set out today.	17
18		I think it would have been directed by the Department	18
19		straight to the Post Office Minister.	19
20	Q.	Were they sentiments that you were aware of more	20
21		broadly?	21
22	Α.	Well, I'm not sure I was aware of them more broadly but	22
23		I couldn't have written it better myself. It basically	23
24		reflects my views on the judgment.	24
25	Q.	Were they your views at the time?	25
		171	

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1 "I am sure you're aware that judgment in the first 2 part of the trial came down very strongly for the 3 subpostmasters, with strong criticism of the management of Post Office. We are currently in the second phase of 4 5 the trial looking at the Horizon system operated by the 6 Post Office. We are confident often a similar outcome. "The Post Office are fighting the case vigorously 8 and are already considering appealing the first 9 judgment. However, two of their Senior Managers have 0 been found lying understanding oath in the court whilst giving their evidence with the severe adverse comments 1 2 by the judge. 3 "I respectively request that you raise questions 4 with the Minister responsible for Post Office, as to 5 whether they have seen the judgment of the court and 6 what is the Minister proposing to do about it. The 7 Government is the single shareholder of the Post Office 8 and that Government, in its own words 'has an arm's 9 length' approach to managing the Post Office, and it is 0 this very 'arm's length' approach that has created this 1 position whereby Post Office is in the middle of a train 2 crash and refuses to see it. Meanwhile people like me 23 have been fighting for 'justice' for over ten years 4 having lost many hundreds of thousands of pounds at the 5 hands of the Post Office. There are 550 of us in this 170 1 A. Certainly. From might Saturday -- from the Friday night 2 when I first saw the judgment in my box to the 3 conversation on the Saturday morning when I, in effect, 4 directed that it needed to be respected and, to the point here about the financial detriment that had been 5 6 longstanding, my clear instruction was that needed to 7 end and there needed to be a restitution. 8 Q. Could we turn, please, to BEIS0000071. This is 9 a ministerial submission of 12 April. If we could 0 scroll down, it updates you on developments, since the 1 submission of the recusal application. It says in the 2 first paragraph: 3 "The judge dismissed the application on 9 April and 4 refused permission to appeal, but [Post Office] will now 5 seek the Court of Appeal's permission directly. In 6 parallel, [the Post Office] is preparing an appeal of 7 the Common Issues judgment." 8 The "Recommendation" is: 9 "To note the contents of this advice and indicate if you wish [the Post Office] to give you an oral briefing 0

- to supplement this, as well as to outline its appeal strategy once the Board has decided."
 - If we scroll down, please, over the page to
- 24 paragraph 8, we can see a section entitled "Legal Team",
- 25 and it says as follows:

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1		"[The Post Office] has decided to boost the Legal	1	
2		Team and has provisionally appointed Herbert Smith	2	
3		Freehills to oversee the litigation with a direct	3	
4		mandate from the Board rather than through the	4	
5		company legal counsel. Their mandate will be to revisit	5	
6		the approach to the litigation (both substance and	6	
7		tone), which in the short-term means looking at the	7	
8		appeal relating to the Common Issues trial, the	8	
9		currently adjourned Horizon Issues trial, and the	9	
10		strategy for reaching resolution."	10	
11		What did you understand by the reference to	11	
12		substance and tone?	12	
13	Α.	Well, I think the Common Issues judgment I described	13	
14		it as seminal and it was. It was finding, it was in	14	
15		effect directing that the Post Office needed to accept	15	
16		the unfairness of its treatment of subpostmasters and	16	
17		mistresses, and that it needed to the tone thing is	17	
18	~	to conduct itself in a more respectful way.	18	
19 20	Q.	It continues:	19	
20 21		"[The Post Office] is open to making other changes depending on the advice received from the new firm.	20 21	
21		Given the unexpected outcome of the Common Issues trial	21	
22		we have been pressing [the Post Office] to ensure that	22	
24		their litigation strategy is considered with a fresh set	23	
25		of eyes, so this is a good outcome and we expect it to	25	4
20		173		
1	Q.	Were you aware by this stage of any changes to the	1	
2		substance and tone as proposed at earlier submissions	2	
3	Α.	That first submission that you put up did indicate that	3	
4		they were taking the direction that had been given by me	4	
5		and Kelly Tolhurst immediately after the Common Issues	5	
6		judgment. I don't know whether you can put it back up,	6	
7		the end of that first of the two that you have just	7	
8		shown. They were appointing this new team to review the	8	
9		strategy, to report direct to the Board and to change	9	
10		the substance and the tone. So that was encouraging.	10	
11		What was very disappointing in this, I should just	11	A
12		say for completeness, I've seen this in what was	12	
13		disclosed to me but I don't think this submission was	13	
14		sent to me, it was to the Permanent Secretary and to the	14	
15		Post Office Minister.	15	
16	Q.	That's correct.	16	
17	Α.	But through conversations, I would be aware would	17	
18		have become aware of it, you know, I was, I suppose,	18	
19		looking forward, you know, with some anticipation to	19	
20		seeing the outcome of this review by a fresh pair of	20	
21		eyes, and then to find that it, in effect, is taking the	21	
22	-	same approach, was bitterly disappointing.	22	
23	Q.	Could we please turn to BEIS0000075. This is the final	23	
24		significant ministerial submission that I'm going to	24	
25		take you to today, and it's from 11 June. So this is 175	25	
		110		

have a significant bearing on the way the litigation is conducted." We then have a further ministerial submission in May. That's at BEIS0000073, 10 May. By this stage, Herbert Smith Freehills has reviewed the legal strategy. If we scroll down we can see paragraph 5: "Following the appointment of [Herbert Smith Freehills] to oversee the litigation with a direct mandate from the Board, [they have] reviewed [the Post Office's] legal strategy. [They] presented their advice on the proposed approach to the Common Issues [trial]. This approach was endorsed by the Board's Group Litigation Subcommittee ... In broad summary [they] will be appealing ..." Then it sets out (a), (b), (c) and (d), the points they will be appealing. Then it says below, in relation to recusal application: "[The Post Office] applied on 11 April directly to the Court of Appeal for permission to appeal the judge's decision and for the second 'Horizon Issues' trial to be stayed in the meantime." It doesn't seem at this stage as though the litigation strategy has actually changed very much, does it? A. No, to coin a phase, nothing has changed. 174 a ministerial submission to you, to approve and it says, as follows: "At the industry meeting on 4 June, you [Secretary of State] asked for advice on how the ongoing Post Office Limited litigation could be brought to a swift and satisfactory conclusion, ensuring subpostmasters who had been treated unfairly were appropriately compensated." So starting at the beginning there, what was the industry meeting of 4 June, do you recall? A. So I describe in my witness statement that my pattern, as well as having every Director General give to me their thoughts every week, direct to me, I had a series of what I regard as important internal meetings in which we would discuss with the relevant minister present, in this case the Post Office Minister, usually the Permanent Secretary and senior officials, things that were on my mind, or a decision that one of the junior ministers was going to take, that they wanted or I felt that they should have some collective discussion. So this was a weekly meeting of these things, and senior officials were present. I would observe that it says at the industry meeting on 4 June, and we will certainly have had a discussion resulting in this commission.

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25 July 2024

1		My recollection is that there were discussions	1		an attempt to deal with that.
2		before that as well, from around the time of the two	2		There are various references, you'll probably see
2		submissions that you put up, in other words the weeks	2		later in this submission, to, you know, kind of worrying
4		ahead. They quite probably were or quite possibly were	4		about the costs of this. If there's one thing I would
5		at one of the other industry meetings. Unfortunately,	5		communicate very clearly, is that there was no way that
6		the Department doesn't have minutes of those meetings	6		I was going to see the compensation, the entitlement to
7		and, certainly, I would have, in my weekly discussions	7		the subpostmasters, see them sort of bilked to protect
8		with the Permanent Secretary and with the Post Office	8		the for the convenience of the Post Office or even
9		Minister, have been, essentially, kind of preparing the	9		the Treasury and the Government. They needed to get
10		ground for a major intervention in the Post Office to	10		what were their desserts.
11		cause them to do what manifestly I'd hope that they	11	Q.	
12		would do, from that Saturday after the Common Issues	12		"Recommendations" are:
13		judgment, in other words to settle, to set up	13		"That you note the advice and our recommendation
14		a restitution scheme, to change their whole legal	14		that you choose from the following options (which are
15		approach. I hoped that they would do that, as it were	15		not mutually exclusive):
16		voluntarily.	16		"1. Challenge [the Post Office] Chair and Board to
17		By this stage, I had essentially given up on them	17		review their litigation strategy
18		and concluded that they needed to be forced to do it.	18		"2. Commission [the Post Office] to carry out
19	Q.	There's reference there to appropriate compensation. At	19		a project on how to structure and operate a settlement
20		that point in time, what did you have in mind?	20		
21	Α.	Oh, the full detriment. I mean, the detriment can never	21		"3. BEIS Ministers to state publicly that they want
22		be overcome. I mean, the the loss of reputation, you	22		to see justice resulting from litigation for claimants
23		know, the disruption of people's lives can never be	23		with valid claims.
24		properly compensated. But certainly financial	24		"4. Challenge Post Office to announce that it is
25		compensation, and something that was, you know,	25		taking on board some of the legitimate criticisms of the
		177			178
1		judgments and is taking action	1		including dismissing the Board, taking over the
2		"5. Put UKGI lead legal counsel (or other legal	2		litigation by the Department.
		"5. Put UKGI lead legal counsel (or other legal adviser) on [the Post Office] Litigation Subcommittee as	2 3	Q.	litigation by the Department. Thank you. If we scroll down over the page on to
2 3 4		"5. Put UKGI lead legal counsel (or other legal adviser) on [the Post Office] Litigation Subcommittee as director or observer	2 3 4	Q.	litigation by the Department. Thank you. If we scroll down over the page on to paragraph 6, it says there:
2 3 4 5		 "5. Put UKGI lead legal counsel (or other legal adviser) on [the Post Office] Litigation Subcommittee as director or observer "6. Invite Nigel Boardman, Chair of the BEIS Audit 	2 3 4 5	Q.	litigation by the Department. Thank you. If we scroll down over the page on to paragraph 6, it says there: "The current status of the litigation is that at
2 3 4 5 6		 "5. Put UKGI lead legal counsel (or other legal adviser) on [the Post Office] Litigation Subcommittee as director or observer "6. Invite Nigel Boardman, Chair of the BEIS Audit and Risk Committee, to carry out some independent due 	2 3 4 5 6	Q.	litigation by the Department. Thank you. If we scroll down over the page on to paragraph 6, it says there: "The current status of the litigation is that at a hearing on 23 May the judge denied [the Post Office]
2 3 4 5 6 7		 "5. Put UKGI lead legal counsel (or other legal adviser) on [the Post Office] Litigation Subcommittee as director or observer "6. Invite Nigel Boardman, Chair of the BEIS Audit and Risk Committee, to carry out some independent due diligence on [their] litigation strategy 	2 3 4 5 6 7	Q.	litigation by the Department. Thank you. If we scroll down over the page on to paragraph 6, it says there: "The current status of the litigation is that at a hearing on 23 May the judge denied [the Post Office] permission to appeal his judgment in the first 'Common
2 3 4 5 6 7 8		 "5. Put UKGI lead legal counsel (or other legal adviser) on [the Post Office] Litigation Subcommittee as director or observer "6. Invite Nigel Boardman, Chair of the BEIS Audit and Risk Committee, to carry out some independent due diligence on [their] litigation strategy "7. Put in place clear information-sharing 	2 3 4 5 6 7 8	Q.	litigation by the Department. Thank you. If we scroll down over the page on to paragraph 6, it says there: "The current status of the litigation is that at a hearing on 23 May the judge denied [the Post Office] permission to appeal his judgment in the first 'Common Issues' trial and awarded the claimants their costs of
2 3 4 5 6 7 8 9		 "5. Put UKGI lead legal counsel (or other legal adviser) on [the Post Office] Litigation Subcommittee as director or observer "6. Invite Nigel Boardman, Chair of the BEIS Audit and Risk Committee, to carry out some independent due diligence on [their] litigation strategy "7. Put in place clear information-sharing arrangements via the proposed Framework Agreement for 	2 3 4 5 6 7 8 9	Q.	litigation by the Department. Thank you. If we scroll down over the page on to paragraph 6, it says there: "The current status of the litigation is that at a hearing on 23 May the judge denied [the Post Office] permission to appeal his judgment in the first 'Common Issues' trial and awarded the claimants their costs of the Common Issues trial rather than reserving this
2 3 4 5 6 7 8 9 10		 "5. Put UKGI lead legal counsel (or other legal adviser) on [the Post Office] Litigation Subcommittee as director or observer "6. Invite Nigel Boardman, Chair of the BEIS Audit and Risk Committee, to carry out some independent due diligence on [their] litigation strategy "7. Put in place clear information-sharing arrangements via the proposed Framework Agreement for [the Post Office]." 	2 3 4 5 6 7 8 9 10	Q.	litigation by the Department. Thank you. If we scroll down over the page on to paragraph 6, it says there: "The current status of the litigation is that at a hearing on 23 May the judge denied [the Post Office] permission to appeal his judgment in the first 'Common Issues' trial and awarded the claimants their costs of the Common Issues trial rather than reserving this judgment until later in the litigation. Setting out his
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2 3 4 5 6 7 8 9 10 11 12 13 14 15 16	Q.	 "5. Put UKGI lead legal counsel (or other legal adviser) on [the Post Office] Litigation Subcommittee as director or observer "6. Invite Nigel Boardman, Chair of the BEIS Audit and Risk Committee, to carry out some independent due diligence on [their] litigation strategy "7. Put in place clear information-sharing arrangements via the proposed Framework Agreement for [the Post Office]." Then it says: "More radical steps are presented in options 8-10; we recommend these are not pursued at this stage." I think, did you ask for I did. what was called "nuclear options"? 	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16	Q.	litigation by the Department. Thank you. If we scroll down over the page on to paragraph 6, it says there: "The current status of the litigation is that at a hearing on 23 May the judge denied [the Post Office] permission to appeal his judgment in the first 'Common Issues' trial and awarded the claimants their costs of the Common Issues trial rather than reserving this judgment until later in the litigation. Setting out his reasons in a written judgment of 4 June, the judge criticised [the Post Office's] conduct again, namely [the Post Office's] 'veiled or implied threat that mirrors the approach adopted by Post Office on the recusal application, namely that in adopting a course of action in the face of opposition by the Post Office
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2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20	Q. A. Q.	 "5. Put UKGI lead legal counsel (or other legal adviser) on [the Post Office] Litigation Subcommittee as director or observer "6. Invite Nigel Boardman, Chair of the BEIS Audit and Risk Committee, to carry out some independent due diligence on [their] litigation strategy "7. Put in place clear information-sharing arrangements via the proposed Framework Agreement for [the Post Office]." Then it says: "More radical steps are presented in options 8-10; we recommend these are not pursued at this stage." I think, did you ask for I did what was called "nuclear options"? My purpose in requesting and requiring this package of advice, which I think took some time to put together, so 	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20	Q.	litigation by the Department. Thank you. If we scroll down over the page on to paragraph 6, it says there: "The current status of the litigation is that at a hearing on 23 May the judge denied [the Post Office] permission to appeal his judgment in the first 'Common Issues' trial and awarded the claimants their costs of the Common Issues trial rather than reserving this judgment until later in the litigation. Setting out his reasons in a written judgment of 4 June, the judge criticised [the Post Office's] conduct again, namely [the Post Office's] 'veiled or implied threat that mirrors the approach adopted by Post Office on the recusal application, namely that in adopting a course of action in the face of opposition by the Post Office runs the risk that the Post Office will say that the overall outcome of the litigation has already been decided'. The Judge also expressed concern about the escalating costs of the litigation"
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2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	Q. A. Q.	 "5. Put UKGI lead legal counsel (or other legal adviser) on [the Post Office] Litigation Subcommittee as director or observer "6. Invite Nigel Boardman, Chair of the BEIS Audit and Risk Committee, to carry out some independent due diligence on [their] litigation strategy "7. Put in place clear information-sharing arrangements via the proposed Framework Agreement for [the Post Office]." Then it says: "More radical steps are presented in options 8-10; we recommend these are not pursued at this stage." I think, did you ask for I did. or what you called "nuclear options"? My purpose in requesting and requiring this package of advice, which I think took some time to put together, so that the interval between the industry meeting and this submission, I think, is slightly misleading, 	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	Q.	litigation by the Department. Thank you. If we scroll down over the page on to paragraph 6, it says there: "The current status of the litigation is that at a hearing on 23 May the judge denied [the Post Office] permission to appeal his judgment in the first 'Common Issues' trial and awarded the claimants their costs of the Common Issues trial rather than reserving this judgment until later in the litigation. Setting out his reasons in a written judgment of 4 June, the judge criticised [the Post Office's] conduct again, namely [the Post Office's] 'veiled or implied threat that mirrors the approach adopted by Post Office on the recusal application, namely that in adopting a course of action in the face of opposition by the Post Office runs the risk that the Post Office will say that the overall outcome of the litigation has already been decided'. The Judge also expressed concern about the escalating costs of the litigation" In your witness statement at paragraph 96, you have said that the Post Office had not accepted the
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2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24	Q. A. Q.	 "5. Put UKGI lead legal counsel (or other legal adviser) on [the Post Office] Litigation Subcommittee as director or observer "6. Invite Nigel Boardman, Chair of the BEIS Audit and Risk Committee, to carry out some independent due diligence on [their] litigation strategy "7. Put in place clear information-sharing arrangements via the proposed Framework Agreement for [the Post Office]." Then it says: "More radical steps are presented in options 8-10; we recommend these are not pursued at this stage." I think, did you ask for I did. what was called "nuclear options"? I did. or what you called "nuclear options"? My purpose in requesting and requiring this package of advice, which I think took some time to put together, so that the interval between the industry meeting and this submission, I think, is slightly misleading, I think this was in train before that was essentially that I wanted the direction that I'd in effect given on 	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24	Q. A.	litigation by the Department. Thank you. If we scroll down over the page on to paragraph 6, it says there: "The current status of the litigation is that at a hearing on 23 May the judge denied [the Post Office] permission to appeal his judgment in the first 'Common Issues' trial and awarded the claimants their costs of the Common Issues trial rather than reserving this judgment until later in the litigation. Setting out his reasons in a written judgment of 4 June, the judge criticised [the Post Office's] conduct again, namely [the Post Office's] 'veiled or implied threat that mirrors the approach adopted by Post Office on the recusal application, namely that in adopting a course of action in the face of opposition by the Post Office runs the risk that the Post Office will say that the overall outcome of the litigation has already been decided'. The Judge also expressed concern about the escalating costs of the litigation" In your witness statement at paragraph 96, you have said that the Post Office had not accepted the significance of the previous judgment Well, it's to my remark that nothing can change.
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	Q. A. Q.	 "5. Put UKGI lead legal counsel (or other legal adviser) on [the Post Office] Litigation Subcommittee as director or observer "6. Invite Nigel Boardman, Chair of the BEIS Audit and Risk Committee, to carry out some independent due diligence on [their] litigation strategy "7. Put in place clear information-sharing arrangements via the proposed Framework Agreement for [the Post Office]." Then it says: "More radical steps are presented in options 8-10; we recommend these are not pursued at this stage." I think, did you ask for I did. what was called "nuclear options"? I did. or what you called "nuclear options"? My purpose in requesting and requiring this package of advice, which I think took some time to put together, so that the interval between the industry meeting and this submission, I think, is slightly misleading, I think this was in train before that was essentially 	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23		litigation by the Department. Thank you. If we scroll down over the page on to paragraph 6, it says there: "The current status of the litigation is that at a hearing on 23 May the judge denied [the Post Office] permission to appeal his judgment in the first 'Common Issues' trial and awarded the claimants their costs of the Common Issues trial rather than reserving this judgment until later in the litigation. Setting out his reasons in a written judgment of 4 June, the judge criticised [the Post Office's] conduct again, namely [the Post Office's] 'veiled or implied threat that mirrors the approach adopted by Post Office on the recusal application, namely that in adopting a course of action in the face of opposition by the Post Office runs the risk that the Post Office will say that the overall outcome of the litigation has already been decided'. The Judge also expressed concern about the escalating costs of the litigation" In your witness statement at paragraph 96, you have said that the Post Office had not accepted the significance of the previous judgment

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1		I had commissioned this advice, probably better more
2		accurately described as a kind of set of actions to
3		force them into line. I'd commissioned it before this
4		judgment, suspecting that they were not doing what I had
5		directed them to do and, lo and behold, the judgment of
6		Mr Justice Fraser, who seems to have been very alert to
7		the Post Office's conduct, says that, even now, they're
8		engaged in the kind of behaviour that he deprecated in
9		the first Common Issues judgment almost unbelievable.
10	Q.	If we scroll down, please, to paragraph 14 there's
11		a section there regarding the role of Government as sole
12		shareholder. It says at the bottom:
13		"This does not include explicit powers to direct the
14		Board to take a specific course of action"
15		Although, over the page, it says:
16		" though ultimately ministers have the right to
17		appoint or remove any member of the Board"
18		We will get to it but I think those were one of the
19		nuclear options that were proposed?
20	Α.	Indeed. There is throughout this a continuing anxiety
21		on the part of the Department that, you know, it's
22		an arm's-length Limited company, in which the power of
23		ministers is confined to approving the strategy and to
24		appointing or firing individuals, not to direct them,
25		and there was I think it's here, there's a kind of
		181
1		collectively
1		collectively.
2		If we briefly turn to BEIS0000076. We can see the
2 3		If we briefly turn to BEIS0000076. We can see the annexe to the submission, which sets out the options and
2 3 4		If we briefly turn to BEIS0000076. We can see the annexe to the submission, which sets out the options and the advantages and the risks. If we scroll down, we can
2 3 4 5		If we briefly turn to BEIS0000076. We can see the annexe to the submission, which sets out the options and the advantages and the risks. If we scroll down, we can see at page 4 the additional options that were
2 3 4 5 6		If we briefly turn to BEIS0000076. We can see the annexe to the submission, which sets out the options and the advantages and the risks. If we scroll down, we can see at page 4 the additional options that were potentially available:
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on IT Inquiry 25 July		
1		in fact, there it is in paragraph 16 there's
2		a warning that, you know:
3		" care needs to be taken that Ministers do not
4		risk being regarded as shadow directors. A shadow
5		director is someone in accordance with whose directions
6		or Customs the board are accustomed to act."
7		Now, it was very much my intention that the Board
8		should act in accordance with my instructions, they were
9		alive to that, they were drawing my attention to it, so
10		we were skating on somewhat sort of thin legal ice, as
11		it was described to me, which is one of the reasons in
12		my recommendations that I don't think we needed to
13		tiptoe around it in quite that way for God forbid
14		that there should ever be a future case but, in future,
15		that sort of advice should not need to be given.
16	Q.	Was there a point at which you actually considered, in
17		effect, becoming a shadow director?
18	Α.	Well, it was in my mind from the Saturday morning that
19		I had a clear view as to what the Post Office Board
20		should do and that I was going to do everything I could
21		to make sure they implemented it, within the law, hence
22		the this discussion. But I was I was prepared to
23		push the envelope, shall we say.
24	Q.	If we scroll down, at 19 the recommendation was you
25		choose from options 1 to 7, either individually or 182
1		make a strong statement, actually I don't think that
2		very different from what I did direct, which was to say
3		we were on the side of the subpostmasters and the
4		litigation had to change.
5		But, in terms of so the others essentially amount
6		to, one way or another, dismissing the Board, either
7		explicitly, in terms or through perhaps the option 11,
8		taking responsibility for it. They, I think, might be
9		likely, probably would have been likely, to quit on the
10		basis that, you know, it's a lack of faith in our
11		competence.
12		So, essentially, they boiled down to a question of,
13		at that point, should you should I fire the Board?
14		Now, that's something that I certainly wouldn't shy
15		about doing. I have used my powers in other
16		organisations to remove people that I thought were not
17 10		competent or performing or had certain problems
18 19		associated with them.
19		But it's a step that one has to take advisedly, it

seems to me, as a kind of Secretary of State. This was an organisation without a Chief Executive, at this point in time. The interviews, I think, were being conducted that week for the new Chief Executive. Nick Read was someone that was appointed a few weeks after that. So it's an organisation, you know -- running the 184

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1		Post Office is, it's a complex organisation, it's
2		absolutely essential for national infrastructure of
3		paying benefits and applying for passports, and all the
4		rest of the things. So to I would have had in my
5		mind that, in order to instantly summarily, as it were,
6		dismiss the Board, you'd have to have an alternative
7		arrangement in place. To have an organisation as
8		important without any leadership would be quite a big
9		step. In addition to that, I would certainly have had
10		to consult the Prime Minister and others, were I to do
11		that.
12		So my view it was certainly not taken off the
13	_	table. Quite the opposite, I just
14	Q.	
15		you did choose?
16	A.	Yes.
17	Q.	That can be found at UKGI00010205.
18 19		So this is 18th June 2019, I think you were only in post for about a month after this.
20	A.	Yes.
20	<u>д</u> .	It says:
22	પ્ય.	"[Secretary of State] has reviewed this advice and
23		has expressed a preference for the first 7 options to
24		pursue. Content for you to proceed on this basis and we
25		can discuss further at industry meeting when next
		185
1		and I don't know whether we got the date. There was
2		an important appearance that Kelly Tolhurst was going to
3		make at the Post Office Board to tell them what to do.
4		One of the other aspects was that the new Chief
5		Executive was about to be appointed and, no doubt, he
6		would be he or she, turned out to be a he would be
7		the conduit of that.
8		But, in general terms, I think it would be fair to
9		reflect that, given how dilatory the Post Office were,
10		that actually to have been more directive a few weeks
11		earlier might have saved a few weeks in this. I think
12		that would be a reasonable reflection to make.
13	SIR	WYN WILLIAMS: Can I just get one thing straight in my
14		head though. Unless I've got this fact wrong, there
15		would seem to me to be quite some difficulty in actually
16 17		doing very much at all in June 2019 because was it not in June 2019 that the Horizon issues trial started? So
18		it's very difficult to imagine doing anything while
10		you're actually conducting that litigation.
20	Α.	
20	Π.	trial was going on, but I, for example, in the drawing
22		up of a scheme of compensation
23	SIR	WYN WILLIAMS: Sorry, perhaps I put it too broadly, so
24		I'll stop you. In terms of generally the litigation
25		strategy, as opposed to the broader issues
		187

1		scheduled."
2		Can we turn back to the submission, so that is
3		BEIS0000075. Thank you. If we could scroll down and
4		look at the recommendations. How many of those
5		recommendations are you aware were actually fulfilled?
6	Α.	I can't say. There were various actions that were
7		implementing the recommendations, much of which was
8		about the Minister appearing at a POL Board meeting,
9		which I think was in a few weeks' time.
10	Q.	In respect of public statements, for example, were they
11		carried out during your period in office?
12	Α.	I can't remember. I think we did, in terms of well,
13		for I mean, some of these we've already done. For
14		example (3), I think in the communication after the
15		Common Issues judgment, we said that we were aligned
16		with the postmasters and mistresses and we wanted to see
17		restitution. So, actually, I think that was already in
18		train.
19	Q.	Could we please turn to POL00285354. The suggestion
20		might be made that you should have done more of those
21		more quickly.
22	Α.	Mm-hm.
23	Q.	What do you say about that?
24	Α.	Well, I when one takes a decision like that, it
25		there are different ways of implementing it. One was
		186
1	Α.	Yes.
2	SIR	WYN WILLIAMS: of compensating the postmasters, I've
3		just been musing to myself about how anything meaningful
4		could be done while the Post Office lawyers are on their
5		feet busily fighting the postmasters' lawyers before
6		Mr Justice Fraser again.
7	Α.	Sir Wyn, I would say that my hope and intention was that
8		the approach that was taken to that Horizon trial would
9		be different from the approach that had been taken
10		throughout the common issues period, that they would be
11		looking to acknowledge the
12	SIR	WYN WILLIAMS: I might be trespassing well beyond my
13		terms of reference but it seems to me that, once the
14		Horizon Issues trial started, of course there could be
15		a difference in tone and the way you approached
16		people I don't mean you personally, I mean the Post
17		Office and the Government but, effectively, the
18		choice was either to fight the case properly and
19		legitimately, or to give up. That's what it boils down
20		to.
21		What I mean by "give up", start making real
22		overtures about settlement. I mean, those were the only
23		two practical options in those days, weren't they?
24	Α.	Well, I would agree with you that, in terms of

25 settlement, that was going back to the readout of that 188

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1		Saturday morning conversation. I can't remember the
2		exact words, but it was something to the effect of that
3		we shouldn't wait for the end of the legal processes to
4		settle, in effect.
5		So that was part of it. Part of these points that
6		we've just been talking about were to begin setting up
7		the structure of a compensation scheme but I am not
8		a legal not a lawyer, let alone a legal expert, so to
9		what extent the my hopes that the conduct of the
10		of that of the Post Office's participation in that
11		trial could have been changed, I had hoped and intended
12		that it that was possible, that it should happen.
13		WYN WILLIAMS: All right. Thank you. Okay.
14	MR	BLAKE: Can we please turn to POL00285354. This is the
15		final document I'll take you to before we move on to
16		recommendations.
17		This is an email of 30 September 2019, so it's after
18		your time in office. It's an email from Alisdair
19 20		Cameron to Nick Read and it relates to potential
20		changes, structural changes. It says:
21 22		"In the conversation there are multiple stakeholders
22		with varying needs which I have tried to set down in the
23 24		attached (which should not be forwarded please). I don't think a [I think that's some sort of
24 25		responsibility assignment matrix] is the answer because
20		189
1 2		I thought this whole document was pretty cynical. It's looking, as we go on, to looking at ways in
3		which the stakeholders can be, as it were, sort of
4		managed, it seems to me. I was
5	Q.	There's a section there on Alex Chisholm
6	Α.	(Unclear)
7	Q.	and it says:
8		"Alex doesn't want us to do anything that might
9		damage his career prospects.
10		"Alex meets us very rarely to date. His views have
11		been developed, starting with the last funding round,
12		when he and Greg Clark concluded that UKGI had gone
13		native and they were anxious about Government investing,
14 15		via us, commercially (not their skillset) and how did they stop us throwing 'good money after bad'?"
16		It's that, in particular, I want to ask you about,
17		where it says that you "concluded that UKGI had gone
18		native"; is that a fair reflection of your view at the
19		time and, if so, why?
20	Α.	I don't think I would have put it in necessarily those
20		terms but certainly, during the funding round, as it's
22		referred to, it was my responsibility, as Secretary of
23		State, along with the Permanent Secretary, to ensure
24		that public funds were not wasted and I felt, and
25		I think the Permanent Secretary felt, that there were
		191

on II	[Inq	uiry 25 July 2024
1		they won't abide by it."
2		It seems to be relating to UKGI
3	Α.	Yes.
4	Q.	and how to manage that relationship.
5		The document that's attached to that can be found at
6		POL00285355, and there are various comments from
7		Mr Cameron. I'd just like to get your view on these
8		because I think you did meet Mr Cameron on a number of
9		occasions.
10	Α.	l did.
11	Q.	So BEIS Secretary of State that may be a reference at
12		that stage to Andrea Leadsom rather than yourself, or to
13		the post, it's not entirely clear. But it says:
14		"Usually the [Secretary of State] has no strong
15		feelings except not being embarrassed by us. The [Group
16		Litigation Order] is important because we are being sued
17		by Postmasters politicians have mixed feelings about
18		us but LOVE constituency postmasters and will always
19		side with them versus us if they can. When we make that
20		difficult it is stressful."
21		Were you aware of those views, as expressed there?
22	Α.	Well, when I first saw this document I assumed, wrongly,
23		that it was referring to me, and I don't believe anyone
24		can think I didn't have strong feelings on the matter,
25		but I think it's my successor.
		190
1		proposals that were being made to invest in quite large
2		sums of money in different ventures that seemed to be
3		dubious, in terms of their likely value for money.
4		And I think there's a structural problem here, in
5		that UKGI we may come on to talk about this a bit
6		more UKGI is a sort of deal-making it's a kind of,
7		you know, it's a private equity-type organisation who
8		I think the people in it, structurally, are kind of keen
9		to do deals and to do the things that you do in
10		corporate finance. And so, in our scrutiny of UKGI,
11		I think we were pretty wary about their views and they
12		were more aligned with encouraging the Post Office to do
13		things that we didn't necessarily think were judicious.
14	Q.	It says:
15		"[Mr Chisholm] has been infuriated by the GLO which
16		he thinks we should have settled ages ago and said so
17		last year."
18		Do you recall Mr Chisholm having said that the GLO
19		should have been settled considerably earlier?
20	Α.	I don't. I don't recall him having said that. For the
21		reasons that I gave, I think, earlier in our discussion
22		this afternoon, I thought it was important that that
00		litter attende and all all attende and all and the second se

23 litigation concluded, that it were not -- I can see from

- 24 a sort of Department -- from a Permanent Secretary's
- 25 point of view, to have it sort of dealt with might have 192

1		had its attractions, but I think a lot of what was in
2		the very comprehensive judgment would not have been in
3		the public domain. And if you take the view that I do,
4		and did, that the criminal convictions, the unsafety of
5		the the lack of safety of the criminal convictions
6		was, as it were, the keystone of the edifice, I think
7		pursuing that litigation, I think, was important for
8		that.
9		My concern, having seen partly what happened, going
10		right back to the beginning of my evidence of the
11		supposed settlement mediation through Second Sight, that
12		was not satisfactory, and so I think it needed that
13		resolution. But that's a long digression. I did not
14		know that Alex Chisholm took that view.
15	Q.	If we scroll down, finally, on this document, there's
16		a reference to UKGI, and it says:
17		"UKGI has the role of overseeing Government's
18		commercial interests. They're generally ineffective and
19		pleasant."
20		Very briefly, what was your view of UKGI?
21	Α.	Well, I've got great respect for the people who, often
22		after distinguished commercial careers, give up their
23		time to be on the Board of UKGI and to serve in the
24		public interest, and I don't want to say anything
25		critical about them. But I think there is I have
		193
1		with the Treasury, or with the Communities Department,
1 2		with the Treasury, or with the Communities Department, they wanted to work together. So I think there was
2		they wanted to work together. So I think there was
2 3		they wanted to work together. So I think there was a kind of cod corporate finance arrangement to this
2 3 4	Q.	they wanted to work together. So I think there was a kind of cod corporate finance arrangement to this that, actually, I don't think was appropriate and
2 3 4 5	Q.	they wanted to work together. So I think there was a kind of cod corporate finance arrangement to this that, actually, I don't think was appropriate and necessary.
2 3 4 5 6	Q.	they wanted to work together. So I think there was a kind of cod corporate finance arrangement to this that, actually, I don't think was appropriate and necessary. If I could bring on to screen the memorandum of
2 3 4 5 6 7	Q.	they wanted to work together. So I think there was a kind of cod corporate finance arrangement to this that, actually, I don't think was appropriate and necessary. If I could bring on to screen the memorandum of understanding that was in place during your period in
2 3 4 5 6 7 8	Q.	they wanted to work together. So I think there was a kind of cod corporate finance arrangement to this that, actually, I don't think was appropriate and necessary. If I could bring on to screen the memorandum of understanding that was in place during your period in office. That's UKGI00017461. It explains, under
2 3 4 5 6 7 8 9	Q.	they wanted to work together. So I think there was a kind of cod corporate finance arrangement to this that, actually, I don't think was appropriate and necessary. If I could bring on to screen the memorandum of understanding that was in place during your period in office. That's UKGI00017461. It explains, under "Background":
2 3 4 5 6 7 8 9	Q.	they wanted to work together. So I think there was a kind of cod corporate finance arrangement to this that, actually, I don't think was appropriate and necessary. If I could bring on to screen the memorandum of understanding that was in place during your period in office. That's UKGI00017461. It explains, under "Background": "UKGI is a limited company wholly owned by HM
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1		reflected on this over the weeks and months ahead
2		I think there's something of a kind of Emperor's New
3		Clothes quality to UKGI, as an organisation, that, with
4		hindsight, I think I and perhaps others should have
5		pointed out.
6		I mean, let me give you some examples, some of them
7		perhaps trivial. It talks about its "assets", the whole
8		time, "We are managing the asset", "We are dealing with"
9		"These are our assets". It's a peculiar way of
10		talking. These are, you know, the Post Office, the
11		Nuclear Decommissioning Authority, Ordnance Survey.
12		They're not assets. It denotes no one in Government
13		would talk about the "assets". They are organisations,
14		they are public bodies; why not call them public bodies?
15		I think the fact that it's a limited company is
16 17		a bit peculiar. You know, why do you have a limited
17		company with all of the downsides, in terms of being
10		able to direct, and that we've discussed, when it doesn't charge for its advice? I don't see why it
20		should be a limited company.
20		And to have a limited company giving advice on
22		another limited company, I think, is a bit peculiar.
23		And this whole thing of having memorandums of
24		understanding with departments, you know, the Business
25		Department didn't have a memorandum of understanding
		194
1		It then has a section on accountabilities and
1 2		It then has a section on accountabilities and responsibilities, and it says:
		It then has a section on accountabilities and responsibilities, and it says: "The accountability to Parliament for the Activities
2		responsibilities, and it says:
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2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	A.	responsibilities, and it says: "The accountability to Parliament for the Activities UKGI is involved in will be" Then it says: "Ministerial level: BIS Ministers." Then, if we scroll over to the fourth page, it sets out there what it defines as the activities as at 1 April 2016, and one of the assets, as you say, defined under "Assets" is the Post Office. If we scroll back to the first page, it says on the first page, paragraph 4: "The accountability to Parliament for the Activities [ie the Post Office]: "[At] Ministerial level: BIS Ministers." Irrespective of the legal interpretation of this memorandum of understanding, do you understand there to be a clear link of accountability of UKGI? No, and I think it's obscured somewhat by its organisation as a limited company. I mean, in other I think I say in my witness statement that it describes itself as being, you know, owned by the Treasury, and accountability is to Treasury Ministers.

1		difficulty in understanding the role of civil servants.	1		a ki
2		Again, they're not part of the Civil Service, I don't	2		a co
3		know why not. There are norms in the Civil Service as	3		spo
4		to how to proceed. I don't think it needs that.	4		Dep
5		I understand that one reason I suspect, I don't	5		
6		know, but I suspect one reason for creating this limited	6		a m
7		company, arm's-length body is to be able to pay people	7		l th
8		more than the Civil Service pay scales allow.	8		of it
9		But that's a good example, it seems to me, of, you	9		sor
10		know, setting up something to get round a problem rather	10		the
11		than to address it. If you need, you know, senior	11		Boa
12		corporate finance people in Government to advise	12		оре
13		Ministers and Permanent Secretaries, then, rather than	13	Q.	One
14		sort of set up a limited company to employ them, why not	14		pro
15		have an exception and be direct about it, it seems to	15		inte
16		me?	16		that
17	Q.	How would you improve, very briefly, the line of	17	Α.	We
18		accountability?	18		tho
19	Α.	Well, I would certainly have UKGI reporting well,	19		abc
20		I would prefer the advice to be within the Department,	20		whe
21		in essence to be from officials within the Department.	21		the
22		There's another example of this, and I in	22		as a
23		preparing for this hearing, a number of the other public	23		con
24		bodies, the Nuclear Decommissioning Authority, an asset	24		Cor
25		in the terms of UKGI, had obviously not a similar but	25		bus
		197			
1		seems evident, I think from our conversation this	1		Bar
2		afternoon, that there is a combination of public	2		oth
3		interest and commercial interest.	3		
4		In other spheres in charities, for example we	4		pro
5		have a corporate form. The Charity Law states I'm	5		per
6		the trustee of a charity how that should be because	6		a u
7		it's a particular way of organising things. There are	7		pro
8		things like community interest companies that have their	8		' a ki
9		separate governance. So, just for simplicity, to	9		
10		recognise that there are some organisations in which	10		be
11		there is, pretty much sort of jointly and severally,	11		cap
12		a public interest, as well as a commercial interest, and	12		evi
13		to make it very clear that ministers and officials are	13		is th
14		absolutely at liberty to have information to direct, as	10		imp
15		it were, proceedings there, it seems to me, would make	15		mp
16		life a whole lot easier.	16		atte
17	Q.	Some people have blamed individual actions as well as	10		the
18	٩.	structures. How would you guard against that?	18		con
19	Α.	Well, there will always be individuals who don't	10		cor
20		discharge their duties as well as they should. When	20		also
20		we're talking about UKGI, I have been very struck and	20 21		this
21		I'm the latest in a series of witnesses who have been	21		
22			22		info
23 24		members of the Government that many of my predecessors have been critical about individuals who	23 24		con
24 25		•	24 25		min
20		have been employed by UKGI: I think Jo Swinson was, 199	20		mir

1		a kind of related problem in which it got into
2		a contractual tangle. UKGI were not very effective in
3		spotting it and bringing it to the attention of the
4		Department and ministers.
5		As Secretary of State, I commissioned a review by
6		a man called Steve Holliday into that and it reported,
7		I think a couple of years ago. And, interestingly, one
8		of its recommendations is that the complexity of this
9		sort of governance is excessive and it should be
10		there should be BEIS civil servants directly on the
11		Board, and that's, it seems to me, a preferable way of
12		operating.
13	Q.	One of the things that you've referred to in your
14	ω.	proposed recommendations is something called a public
15		interest company. Very briefly, how do you envisage
16		that would work?
17	Α.	Well, it's a thought, rather than a blueprint, but the
18		thought is this: that some of what we've been talking
19		about has been, you know, advice about, you know,
20		whether you're going to be a shadow director; is this
21		the responsibility of the Board; do you have standing,
22		as a minister, to direct it or not? And a lot of this
23		comes from using the kind of vehicle of an ordinary
24		Companies Act company to contain
25		businesses/organisations like the Post Office, and it
20		198
1		Baroness Neville-Rolfe, Margot James, Kelly Tolhurst and
2		
3		others.
4		I think that actually points to a kind of structural
4		I think that actually points to a kind of structural problem that they are in a dilemma, or at least are
4 5		I think that actually points to a kind of structural problem that they are in a dilemma, or at least are perhaps because of the requirement to be a member of
4 5 6		I think that actually points to a kind of structural problem that they are in a dilemma, or at least are perhaps because of the requirement to be a member of a unitary board, are drawn into a certain way of
4 5 6 7		I think that actually points to a kind of structural problem that they are in a dilemma, or at least are perhaps because of the requirement to be a member of a unitary board, are drawn into a certain way of proceeding at the expense of another, and this is not
4 5 6 7 8		I think that actually points to a kind of structural problem that they are in a dilemma, or at least are perhaps because of the requirement to be a member of a unitary board, are drawn into a certain way of proceeding at the expense of another, and this is not a kind of trivial observation.
4 5 6 7 8 9		I think that actually points to a kind of structural problem that they are in a dilemma, or at least are perhaps because of the requirement to be a member of a unitary board, are drawn into a certain way of proceeding at the expense of another, and this is not a kind of trivial observation. I mean, you know, one of the purposes of UKGI is to
4 5 6 7 8 9		I think that actually points to a kind of structural problem that they are in a dilemma, or at least are perhaps because of the requirement to be a member of a unitary board, are drawn into a certain way of proceeding at the expense of another, and this is not a kind of trivial observation. I mean, you know, one of the purposes of UKGI is to be good at governance, to improve the Government's
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4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19		I think that actually points to a kind of structural problem that they are in a dilemma, or at least are perhaps because of the requirement to be a member of a unitary board, are drawn into a certain way of proceeding at the expense of another, and this is not a kind of trivial observation. I mean, you know, one of the purposes of UKGI is to be good at governance, to improve the Government's capacity at governance. But I have to say, on the evidence of this, and I think on the NDA, the evidence is that they have not been very good at that, in important instances. For example, the failure of UKGI to bring to the attention of the Post Office Board, let alone ministers, the Parker Review/the Swift Review, which was highly consequential, that seems to me to be a failure of corporate governance, in which UKGI was part. I might

confidence in Paula Vennells, for example. UKGI did. You've had conversations, I know, about, you know, ministers from successive administrations being aware of 200

1	what happened in the previous one. I think that would
2	have been very material, to know that the Board had
3	expressed, in the past at least, a lack of confidence
4	there.
5	So even as corporate governance specialists, I don't
6	think the record of UKGI is all that robust, shall we
7	say.
8	Q. Thank you. Very finally, you've clearly watched a lot
9	or heard a lot of the evidence from this Inquiry. Are
10	there any recommendations that didn't make its way into
11	your statement that you can think of now, briefly?
12	A. I tried to reflect on all of these. I do say something
13	about the pattern of evidence. I mean, it seems to me
14	kind of standing back, and I think it you know, in
15	public policy and public life generally, one of the
16	things that I've become been interested in, in recent
17	years I was chairing the Science and Technology
18	Committee at the House of Commons is the development
19	of artificial intelligence.
20	Artificial intelligence I'll explain the
21	relevance in a second spots patterns that, actually,
22	as it were, the naked eye may not spot. I think if the
23	pattern of prosecutions/convictions had been spotted
24	better and earlier then certainly a lot of the time to
25	resolve these matters might have been shortened and, in 201
	201
1	to think about in terms of how I make recommendations
2	for the future.
3	THE WITNESS: Thank you, Sir Wyn, and if I'm put in the
4	position of my colleagues, to thank you and the Inquiry
5	for the meticulous approach that you're taking to it.
6	Thank you.
7	SIR WYN WILLIAMS: Right, Mr Blake, tomorrow we resume at
8	9.45?
9	MR BLAKE: That's correct, sir, yes.
10	SIR WYN WILLIAMS: We have a part-heard witness, do we not,
11	and then Mr Edwards, is it? Yes, it is.
12	MR BLAKE: That's correct, yes.
13	SIR WYN WILLIAMS: Fine. All right, then. 9.45 tomorrow.
14	MR BLAKE: Thank you very much.

15	(4.28	pm)
10	T .20	pilly

- (The hearing adjourned until 9.45 am the following day) 16 17
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- 1 many cases, by getting to a recognition of injustice 2 earlier, some people might have been saved the appalling 3 effects that they had. And so some of the 4 recommendations I make in my witness statement is to 5 give responsibility, whether it's to the CPS or other 6 bodies, to actively monitor unusual patterns, so that 7 they can be brought forward earlier. 8 But here am I, as it were, sort of freelancing into an area that is judicial, in which I am not really 9 10 qualified. So I mention that because you asked me 11 whether there was anything else I included in my witness statement, and that was a reflection that I made. 12 13 MR BLAKE: Thank you very much. 14 Sir, I don't think there are any questions from Core 15 Participants, unless you sir, have any questions? 16 SIR WYN WILLIAMS: No, I asked the few that I needed to as 17 we went along. So thank you very much, Mr Clark, for your witness
- 18
- 19 statement, for your oral evidence and also for your
- 20 reflections. A number of your fellow current or past 21 politicians have addressed their minds to reflections,
- 22 so I think I'm right in saying that, currently at least,
- 23 you are the last politician who is going to give
- 24 evidence in this phase and so I would thank all of you,
- 25 and you've used the vehicle for providing me with plenty 202

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