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1	(40	Tuesday, 30 July 2024
2	•	.00 am)
3 4	214	WYN WILLIAMS: Morning, everyone. Mr Blake?
4 5	мр	
5 6	IVIT	BLAKE: Morning, sir. This morning we're going to hear
7		from Ms Storey. SUSANNAH JEMIMA STOREY (affirmed)
8		Questioned by MR BLAKE
9	MP	BLAKE: Thank you very much. Can you give your full name
10	WIIN	please.
11	Α.	
12	Q.	· · · · · · · · · · · · · · · · · · ·
13	Ξ.	statement dated 23 May this year?
14	Α.	Yes.
15		Can I ask you to turn to the final substantive page,
16		that's page 102. Can you confirm that that is your
17		signature?
18	Α.	That is my signature.
19		Thank you, is that statement true to the best of your
20		knowledge and belief?
21	Α.	It is, although, as we discussed, there are some small
22		changes I wanted to make.
23	Q.	Thank you very much. Perhaps we could bring the
24		statement on to screen. It's WITN00920100.
25	SIR	WYN WILLIAMS: Can everyone hear because I'm actually
		1
1		"substantial" after the "only" so it would read "the
2	~	only substantial item of business".
3 4	Q. A.	Thank you very much.
4 5	А.	And, sorry, lastly, paragraph 201 I realised was missing a word.
6	Q.	That's page 90.
7	Q. A.	Page 90, yes. In the final sentence of the paragraph,
, 8	Λ.	it says, "I obtained significant relating". I think it
9		needs to read "I obtained significant information
10		relating".
11	Q.	Thank you. Subject to those changes, is the statement
12		true to the best of your knowledge and belief?
13	Α.	It is.
14	Q.	Thank you very much. That witness statement will be
15		uploaded onto the Inquiry's website in due course.
16		Ms Storey, you're currently Permanent Secretary of
17		the Department for Culture, Media and Sport; is that
18		correct?
19	Α.	That is correct.
20	Q.	You started life as an investment banker between 1995
21		and 2006?
22	Α.	That's right.

- 22 Α. That's right.
- 23 Relevant for today's purpose, you worked at ShEx between Q.
- 24 2006 and 2013, initially on a secondment; is that
- 25 correct?

- slightly struggling, whether it's just me, I don't know. 2 But is the system working properly? Fine it's just me, obviously. 4 MR BLAKE: Perhaps if you could sit slightly further forward, it would assist. 6 FROM THE FLOOR: It's not just you. SIR WYN WILLIAMS: Right. Good. THE WITNESS: Let me know, is that better? Maybe I was a bit too far from the microphone, my apologies. 10 MR BLAKE: There are a few changes you would like to make. 11 Can we start with the first. Which paragraph? A. Paragraph 21. 12 Q. Paragraph 21 is page 10. 13 A. Page 10, yes. In the sentence "I do not recall any 14 significant concerns", which is about halfway down that 15 16 paragraph, two lines down, it says, "My tenure as 17 Director" I would like to insert "RMPS" before "Director" to make clear I wasn't a director of the Post 18 19 Office at that time. That was a title in my Civil 20 Service role. 21 Q. Thank you very much. 22 A. The next one is paragraph 110, page 49. In the first 23 line, I would like to delete "single issue". 24 Q. Thank you. 25 A. Then over the page in paragraph 111, I'd like to insert 2 Α. That's correct. 2 Q. Between March 2011 and March 2012, you were Director of ShEx's Royal Mail and Postal Services team --4 A. Yes.
  - Q. -- and I think that's the correction you just made in
  - that paragraph?
- 7 Α. (The witness nodded)
- 8 Q. You were then the first Shareholder Non-Executive of the Post Office between April 2012 and March 2014; is that 9
- 10 correct?

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- A. That is correct. 11
- Q. That was upon separation from Royal Mail Group? 12
- 13 Α. Yes.
- 14 Q. Can you assist us with how you were selected for that 15 role as Non-Executive Director?
- A. So the Shareholder Executive looked after a number of 16 17 different government-owned entities and, in some
- instances, there would be a Board member from the
- 18 relevant team. I was most recently, as you were just 19
- saying, from March 2011 the Director of the Royal Mail
- 20 21
- and Postal Services team, and once the Government 22
- decided it wanted to have a representative on the Board

- 23 of the Post Office on separation, it was the working
- 24 assumption, I think, that, as the Director, that would 25
  - be me.

1		I've set out in my statement some of the further	1	
2		background in case helpful, so I obviously knew the	2	
3		Postal Services space well, having worked for a number	3	
4		of years on the Royal Mail side as a civil servant and	4	
5		I'd also experience working with boards when I was	5	
6		an investment banker.	6	
7	Q.	Did you have any prior experience of being on a board?	7	
8	Α.	No, I hadn't been on a board before.	8	
9	Q.	Were you provided with any training before you took up	9	
10		the post, specific to that role of Non-Executive	10	
11		Director?	11	
12	A.	No.	12	
13	Q.	I want to ask you about your location and also the	13	
14		support that was provided to you during your time as	14	
15		Non-Executive Director. You became a Non-Executive	15	
16		Director when on maternity leave, which was between	16	
17		March 2012 and March 2013. When you came back, you were	17	
18		based at the Department for Energy and Climate Change,	18	
19		at that time an entirely separate department; is that	19	~
20		correct?	20	Q.
21	Α.	That's correct. So when could I give a couple of	21	
22	~	moments for context is that's okay?	22	
23	Q.	5	23	Α.
24 25	Α.		24 25	
25		agenda for these two companies, which including the 5	25	
1		I also was required by the Department to hand back all	1	
2		of my IT, so my phone and my computer, which is why, in	2	
3		a lot of the disclosed documents, you'll see me using	3	
4		a personal email address.	4	
5	Q.	•	5	
6		separately paid role in any way; is that correct?	6	
7	A.	No, I received no remuneration for being the shareholder	7	
8		representative Board member, although of course I was	8	Q.
9		getting a salary and, during maternity leave, you're	9	
10		paid for some months. And then when I was at the	10	
11		Department of Energy and Climate Change from March 2013,	11	Α.
12		I was being paid a salary by them to do that job. So in	12	
13		a sense, as a civil servant, I was getting remuneration.	13	
14		There was no additional remuneration, nor would I have	14	
15		expected it.	15	
16	Q.	When you were at the Department for Energy and Climate	16	
17		Change, you were managing an entirely different	17	Q.
18		portfolio?	18	
19	Α.	That's right. I was Strategy Director there, thinking	19	
20		about the Climate Change Act and all of the things we	20	
21		needed to do to decarbonise the country.	21	
22	Q.	Were those logistical issues discussed with you before	22	
23		you took on the position?	23	
24	Α.	Not particularly. I mean, I think, as I was saying, the	24	
25		sort of set of things we were doing through 2011 to	25	Α.
		7		

separation, the Postal Services Act 2011 was passed to
enable all of that, we were tying to help stabilise the
pension scheme, change the regulation, and so on. And
so I during the course of that process, as I was just
saying, it became clear that we wanted a shareholder
representative.
I was pregnant during that year and, by the time
I started on the Board, which was the April Board
meeting, 2012, I had started my maternity leave, which
began on 14 March 2012. When you go on maternity leave,
you don't generally know how long you're going to go
for, and my expectation at that time was that I would
have come back to the Shareholder Executive but, during
the course of the year, I ended up getting a different
role at the Department of Energy and Climate Change.
So I just want to be clear, for the record, I don't
think it was envisaged in 2012 that this was exactly how
it would play out. In the end, it was how it played
out.
Absolutely. So throughout that period, from really the
beginning to the end, you weren't physically present at
what we know as ShEx; is that correct?
My last day in the office was 14 March 2012, and I was
never sitting at desks with those people, I was never in
that team again. And as I've said in my statement,
6
March 2012 I mean in the source of my server
March 2012 I mean, in the course of my career,
I think that's one of the single-most complex set of
transactions that I've ever done, and I had a career as
an investment banker doing transactions, so the critical
path to March 2012 was highly complex and I don't think
we were getting into the weeds of my personal logistics
at that time.
Not just personal logistics but in fact, actually,
physical location and relationship with the Shareholder
Executive team, for example?
The relationship with the Shareholder Executive team we
did discuss because, obviously, before I joined the
Board, I was getting up to speed on aspects of the Post
Office with the Post Office team within the shareholder
team. So we absolutely discussed that. Sorry, I had
thought you meant physical logistics.
In terms of the role of Non-Executive Director, it has
been described by some witnesses as having a dual
function: one of those functions being exercising
governance over the assets, so the normal Non-Executive
Director role; but also communicating the day-to-day
Government perspective. I think that's how Patrick
O'Sullivan has described it. Is that a description that
you would agree with?
l didn't particularly think of it as an asset. My view
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(2) Pages 5 - 8

separation, the Postal Services Act 2011 was passed to

1		of the Non-Executive Director role is as set out in the
2		Companies Act 2006. As a shareholder representative,
3		I had some additional things I needed to do, which the
4		others didn't need to do. That was the way I thought
5		about it.
6	Q.	Was that additional role communicating the day-to-day
7		Government perspective or some other witnesses have said
8		that it involved communicating the Post Office's
9		perspective to Government, so the other way round.
10		Which, if either of those, did you see it as?
11	Α.	My view was that the Secretary of State, in his letter
12		to the Chairman in January 2012, set out very clearly
13		what he thought the objectives for the Post Office were,
14		on separation, and I thought it was my role to make
15		sure, on top of the ordinary Non-Executive Director
16		responsibilities, that whenever the appropriate moment
17		arose at the Board table, you know, I could help make
18		sure those things were happening.
19		And that was my real priority when I went on to that
20		Board: to really focus on areas like the financial
21		stability, the mutualisation, the pension separation and
22		the sustainability of that company because, as I think
23		many people have said, at the time that was far from
24		certain.
25	Q.	So you have the letter from the Secretary of State that
25	ч.	9
1		dialogue all the way through.
1 2	Q.	dialogue all the way through. Paragraph 50 of your witness statement, you say:
	Q.	
2	Q.	Paragraph 50 of your witness statement, you say:
2 3	Q.	Paragraph 50 of your witness statement, you say: "I was also conscious of the fact that my position
2 3 4	Q.	Paragraph 50 of your witness statement, you say: "I was also conscious of the fact that my position as a newly appointed Shareholder NED was a novel one,
2 3 4 5	Q.	Paragraph 50 of your witness statement, you say: "I was also conscious of the fact that my position as a newly appointed Shareholder NED was a novel one, and there was some uncertainty as to the nature and
2 3 4 5 6	Q. A.	Paragraph 50 of your witness statement, you say: "I was also conscious of the fact that my position as a newly appointed Shareholder NED was a novel one, and there was some uncertainty as to the nature and extent of my remit at the outset."
2 3 4 5 6 7		Paragraph 50 of your witness statement, you say: "I was also conscious of the fact that my position as a newly appointed Shareholder NED was a novel one, and there was some uncertainty as to the nature and extent of my remit at the outset." Can you assist us with what you mean by that? Yes, so as I said, there hadn't been a Shareholder
2 3 4 5 6 7 8		Paragraph 50 of your witness statement, you say: "I was also conscious of the fact that my position as a newly appointed Shareholder NED was a novel one, and there was some uncertainty as to the nature and extent of my remit at the outset." Can you assist us with what you mean by that?
2 3 4 5 6 7 8 9		Paragraph 50 of your witness statement, you say: "I was also conscious of the fact that my position as a newly appointed Shareholder NED was a novel one, and there was some uncertainty as to the nature and extent of my remit at the outset." Can you assist us with what you mean by that? Yes, so as I said, there hadn't been a Shareholder Non-Executive Director, shareholder representative on the Board of either of these companies and, from April
2 3 4 5 6 7 8 9		Paragraph 50 of your witness statement, you say: "I was also conscious of the fact that my position as a newly appointed Shareholder NED was a novel one, and there was some uncertainty as to the nature and extent of my remit at the outset." Can you assist us with what you mean by that? Yes, so as I said, there hadn't been a Shareholder Non-Executive Director, shareholder representative on the Board of either of these companies and, from April 2012 when they were separated, you had two sister
2 3 4 5 7 8 9 10 11 12		Paragraph 50 of your witness statement, you say: "I was also conscious of the fact that my position as a newly appointed Shareholder NED was a novel one, and there was some uncertainty as to the nature and extent of my remit at the outset." Can you assist us with what you mean by that? Yes, so as I said, there hadn't been a Shareholder Non-Executive Director, shareholder representative on the Board of either of these companies and, from April 2012 when they were separated, you had two sister companies, the Royal Mail Group and the Post Office: one
2 3 4 5 6 7 8 9 10 11 12 13		Paragraph 50 of your witness statement, you say: "I was also conscious of the fact that my position as a newly appointed Shareholder NED was a novel one, and there was some uncertainty as to the nature and extent of my remit at the outset." Can you assist us with what you mean by that? Yes, so as I said, there hadn't been a Shareholder Non-Executive Director, shareholder representative on the Board of either of these companies and, from April 2012 when they were separated, you had two sister companies, the Royal Mail Group and the Post Office: one had a shareholder representative and one didn't. There
2 3 4 5 6 7 8 9 10 11 12 13 13		Paragraph 50 of your witness statement, you say: "I was also conscious of the fact that my position as a newly appointed Shareholder NED was a novel one, and there was some uncertainty as to the nature and extent of my remit at the outset." Can you assist us with what you mean by that? Yes, so as I said, there hadn't been a Shareholder Non-Executive Director, shareholder representative on the Board of either of these companies and, from April 2012 when they were separated, you had two sister companies, the Royal Mail Group and the Post Office: one had a shareholder representative and one didn't. There was no blueprint for that, these companies had never had
2 3 4 5 6 7 8 9 10 11 12 13 14 15		Paragraph 50 of your witness statement, you say: "I was also conscious of the fact that my position as a newly appointed Shareholder NED was a novel one, and there was some uncertainty as to the nature and extent of my remit at the outset." Can you assist us with what you mean by that? Yes, so as I said, there hadn't been a Shareholder Non-Executive Director, shareholder representative on the Board of either of these companies and, from April 2012 when they were separated, you had two sister companies, the Royal Mail Group and the Post Office: one had a shareholder representative and one didn't. There was no blueprint for that, these companies had never had a shareholder representative before, so what I was
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16		Paragraph 50 of your witness statement, you say: "I was also conscious of the fact that my position as a newly appointed Shareholder NED was a novel one, and there was some uncertainty as to the nature and extent of my remit at the outset." Can you assist us with what you mean by that? Yes, so as I said, there hadn't been a Shareholder Non-Executive Director, shareholder representative on the Board of either of these companies and, from April 2012 when they were separated, you had two sister companies, the Royal Mail Group and the Post Office: one had a shareholder representative and one didn't. There was no blueprint for that, these companies had never had a shareholder representative before, so what I was trying to do was kind of get my foot in the door, start
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17		Paragraph 50 of your witness statement, you say: "I was also conscious of the fact that my position as a newly appointed Shareholder NED was a novel one, and there was some uncertainty as to the nature and extent of my remit at the outset." Can you assist us with what you mean by that? Yes, so as I said, there hadn't been a Shareholder Non-Executive Director, shareholder representative on the Board of either of these companies and, from April 2012 when they were separated, you had two sister companies, the Royal Mail Group and the Post Office: one had a shareholder representative and one didn't. There was no blueprint for that, these companies had never had a shareholder representative before, so what I was trying to do was kind of get my foot in the door, start this process but, also, critically, really critically,
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18		Paragraph 50 of your witness statement, you say: "I was also conscious of the fact that my position as a newly appointed Shareholder NED was a novel one, and there was some uncertainty as to the nature and extent of my remit at the outset." Can you assist us with what you mean by that? Yes, so as I said, there hadn't been a Shareholder Non-Executive Director, shareholder representative on the Board of either of these companies and, from April 2012 when they were separated, you had two sister companies, the Royal Mail Group and the Post Office: one had a shareholder representative and one didn't. There was no blueprint for that, these companies had never had a shareholder representative before, so what I was trying to do was kind of get my foot in the door, start this process but, also, critically, really critically, build trust with that Board of Directors. So they were
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19		Paragraph 50 of your witness statement, you say: "I was also conscious of the fact that my position as a newly appointed Shareholder NED was a novel one, and there was some uncertainty as to the nature and extent of my remit at the outset." Can you assist us with what you mean by that? Yes, so as I said, there hadn't been a Shareholder Non-Executive Director, shareholder representative on the Board of either of these companies and, from April 2012 when they were separated, you had two sister companies, the Royal Mail Group and the Post Office: one had a shareholder representative and one didn't. There was no blueprint for that, these companies had never had a shareholder representative before, so what I was trying to do was kind of get my foot in the door, start this process but, also, critically, really critically, build trust with that Board of Directors. So they were all new, relatively new, at the non-executive level.
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20		Paragraph 50 of your witness statement, you say: "I was also conscious of the fact that my position as a newly appointed Shareholder NED was a novel one, and there was some uncertainty as to the nature and extent of my remit at the outset." Can you assist us with what you mean by that? Yes, so as I said, there hadn't been a Shareholder Non-Executive Director, shareholder representative on the Board of either of these companies and, from April 2012 when they were separated, you had two sister companies, the Royal Mail Group and the Post Office: one had a shareholder representative and one didn't. There was no blueprint for that, these companies had never had a shareholder representative before, so what I was trying to do was kind of get my foot in the door, start this process but, also, critically, really critically, build trust with that Board of Directors. So they were all new, relatively new, at the non-executive level. I didn't know any of them. I felt they didn't trust
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21		Paragraph 50 of your witness statement, you say: "I was also conscious of the fact that my position as a newly appointed Shareholder NED was a novel one, and there was some uncertainty as to the nature and extent of my remit at the outset." Can you assist us with what you mean by that? Yes, so as I said, there hadn't been a Shareholder Non-Executive Director, shareholder representative on the Board of either of these companies and, from April 2012 when they were separated, you had two sister companies, the Royal Mail Group and the Post Office: one had a shareholder representative and one didn't. There was no blueprint for that, these companies had never had a shareholder representative before, so what I was trying to do was kind of get my foot in the door, start this process but, also, critically, really critically, build trust with that Board of Directors. So they were all new, relatively new, at the non-executive level. I didn't know any of them. I felt they didn't trust me, so part of what I was doing at that May 2012 Board
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22		Paragraph 50 of your witness statement, you say: "I was also conscious of the fact that my position as a newly appointed Shareholder NED was a novel one, and there was some uncertainty as to the nature and extent of my remit at the outset." Can you assist us with what you mean by that? Yes, so as I said, there hadn't been a Shareholder Non-Executive Director, shareholder representative on the Board of either of these companies and, from April 2012 when they were separated, you had two sister companies, the Royal Mail Group and the Post Office: one had a shareholder representative and one didn't. There was no blueprint for that, these companies had never had a shareholder representative before, so what I was trying to do was kind of get my foot in the door, start this process but, also, critically, really critically, build trust with that Board of Directors. So they were all new, relatively new, at the non-executive level. I didn't know any of them. I felt they didn't trust me, so part of what I was doing at that May 2012 Board meeting was explaining my role as a Shareholder
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	Α.	Paragraph 50 of your witness statement, you say: "I was also conscious of the fact that my position as a newly appointed Shareholder NED was a novel one, and there was some uncertainty as to the nature and extent of my remit at the outset." Can you assist us with what you mean by that? Yes, so as I said, there hadn't been a Shareholder Non-Executive Director, shareholder representative on the Board of either of these companies and, from April 2012 when they were separated, you had two sister companies, the Royal Mail Group and the Post Office: one had a shareholder representative and one didn't. There was no blueprint for that, these companies had never had a shareholder representative before, so what I was trying to do was kind of get my foot in the door, start this process but, also, critically, really critically, build trust with that Board of Directors. So they were all new, relatively new, at the non-executive level. I didn't know any of them. I felt they didn't trust me, so part of what I was doing at that May 2012 Board meeting was explaining my role as a Shareholder Non-Executive Director.
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24		Paragraph 50 of your witness statement, you say: "I was also conscious of the fact that my position as a newly appointed Shareholder NED was a novel one, and there was some uncertainty as to the nature and extent of my remit at the outset." Can you assist us with what you mean by that? Yes, so as I said, there hadn't been a Shareholder Non-Executive Director, shareholder representative on the Board of either of these companies and, from April 2012 when they were separated, you had two sister companies, the Royal Mail Group and the Post Office: one had a shareholder representative and one didn't. There was no blueprint for that, these companies had never had a shareholder representative before, so what I was trying to do was kind of get my foot in the door, start this process but, also, critically, really critically, build trust with that Board of Directors. So they were all new, relatively new, at the non-executive level. I didn't know any of them. I felt they didn't trust me, so part of what I was doing at that May 2012 Board meeting was explaining my role as a Shareholder Non-Executive Director. So we'll get to the May Board meeting but I'm going to
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	Α.	Paragraph 50 of your witness statement, you say: "I was also conscious of the fact that my position as a newly appointed Shareholder NED was a novel one, and there was some uncertainty as to the nature and extent of my remit at the outset." Can you assist us with what you mean by that? Yes, so as I said, there hadn't been a Shareholder Non-Executive Director, shareholder representative on the Board of either of these companies and, from April 2012 when they were separated, you had two sister companies, the Royal Mail Group and the Post Office: one had a shareholder representative and one didn't. There was no blueprint for that, these companies had never had a shareholder representative before, so what I was trying to do was kind of get my foot in the door, start this process but, also, critically, really critically, build trust with that Board of Directors. So they were all new, relatively new, at the non-executive level. I didn't know any of them. I felt they didn't trust me, so part of what I was doing at that May 2012 Board meeting was explaining my role as a Shareholder Non-Executive Director.

1	sets out an annual objective?
1	

- 2 A. The letter to the Chairman.
- 3 Q. The letter to the Chairman.
- 4 **A.** Yeah.

- Q. Outside of pursuing that, did you see your role as in
- any way involving liaison with the Civil Service, with
- 7 ShEx, with Government?
- 8 A. Absolutely, absolutely, yes. So I saw my role at the
- 9 Board table in the way I've just described it, and
- 10 perhaps we'll come on to it, but I was always clear
- 11 which hat I was wearing, in terms of being the
- 12 shareholder representative or the Post Office
- 13 Non-Executive Director. But, in addition, there'd been
- 14 quite a complicated history with these companies with
- 15 the Government and I think there was a strong sense that
- 16 we wanted a reset at separation.
- So part of what I was there for was to get in thatroom and understand what they were actually doing. We'd
- 19 found it very difficult to get information from them
- 20 before, and so, as you'll see in my witness statement
- 21 and from many of the disclosed documents, a lot of the
- time I was then, before and after Board meetings,
- 23 liaising with the shareholder team to say, "Well this is
- 24 my take on what happened, what's your sense of where

25	things are?"	So it was a really,	really strong two-way
		10	

1		take you to is actually a 2010 document. That is
2		UKGI0000062. This is a ministerial submission from
3		Mike Whitehead. It's before your time. Was Mike
4		Whitehead somebody who you worked with?
5	Α.	Yes, absolutely. He was in the Shareholder Post Office
6		Team for a long time.
7	Q.	The purpose is set out there. It's a:
8		" meeting with Alan Bates on Thursday, 7 October
9		at his request to discuss the Justice for Subpostmasters
10		claims that endemic flaws in [the Post Office] Horizon
11		system have resulted in a number of subpostmasters
12		having their contracts wrongly terminated by [the Post
13		Office] and in many cases prosecuted for false
14		accounting."
15		Were these kinds of concerns matters that you were
16		aware of when you became Non-Executive Director, or
17		prior to becoming Non-Executive Director?
18	Α.	So in October 2010, I was in the Royal Mail team, and
19		I wasn't doing anything to do with Post Office. So I'm
20		not sure I would have known about this at that time. By
21		the time I became a Director in April 2012, I did have
22		a kind of background awareness, I would call it, and
23		I had been, for example, copied, in later 2011, on
24		a document in relation to the BBC's Inside Out
25		programme. But I don't recall if you had asked me in 12

1		April 2012, "What are the top ten issues on your mind?",	1		your role, paragraph 2.16. It describes it as follows:
2		unfortunately, I don't think this would have been one of	2		"In April 2012, the first Shareholder [Non-Executive
3		them at the time.	3		Director], Susannah Storey, was appointed to the [Post
4	Q	Broadly speaking, you were aware of the issues raised by	4		Office] Board (and in contrast to the position today,
5	۹.	the Justice for Subpostmasters Alliance?	5		was not on the Audit and Risk or Remuneration
6	Δ	Not in October 2010, I don't recall that, but yes,	6		Committees)."
7		broadly speaking, broadly speaking.	7		Is that right?
, 8	0	By April 2012?	8	Α.	-
9		I'm not sure if I would have, at the time, have thought	9	Q.	
9 10	А.	of it as Sir Alan Bates and the JFSA, <i>per se</i> . I think	9 10	ω.	Committee initially?
11			10	Α.	-
12	0	I would have had a general awareness.	12	А.	I was, I had never seen this document until a couple of weeks ago.
12	Q.	Thank you could we turn now to UKGI00048174. This is a document that's been prepared by UKGI, it's a "looking	12	Q.	C C
				Q.	It then says:
14		back" exercise. I'm just going to read to you a few	14		"Unlike the subsequent Shareholder [Non-Executives]
15		passages. The "Purpose" is described there at 1.1, it	15		(from 2014 onwards), Susannah was, by design, not part
16		says:	16		of the Shareholder Team"
17		"The purpose of this document is to provide	17		Can you assist us with that? Is that correct, that
18		a preliminary view of the key facts relating to the	18		there was an intentional design that you weren't part of
19		involvement of the Shareholder Executive and UK	19		the Shareholder Team?
20		Government Investments Limited in matters relating to	20	Α.	I'm not sure I would phrase it like that but I'm
21		the Post Office Limited's Horizon IT system, and in	21		assuming it's getting at the point that you were making
22		particular the events leading to the commencement of the	22		earlier: that, structurally, I was separate, initially
23		subpostmasters' litigation which was settled in	23		because I was on maternity leave and then because I was
24		December 2019."	24		undertaking the role from a different Department, and
25		There's a passage, it's at page 7, that addresses 13	25		when I did when I went on the Board from April 2012, 14
1		the whole Shareholder Team was refilled. So my role was	1		[Non-Executive Director] were not shared with the
2		backfilled by Roger Lowe and the team beneath were	2		Shareholder Team."
3		there. So in a way, I was kind of bonus person on that	3		We will come on to look at what was and wasn't
4		Board. The team existed as a whole without me.	4		shared but certainly from this document and you can
5		So the essence, I think, of what I was saying,	5		assist us whether that's right or wrong it seems to
6		I would agree with. I don't particularly recall it	6		suggest that, in fact, the very role was designed so
7		being deliberately designed that way.	7		that it was separate from those people who were, for
8	Q.	So the suggestion here, as we'll read on, is not that it	8		example, carrying out funding negotiations?
9		was anything personal to you and your circumstances but,	9	Α.	There was a real nervousness on the part of the company
10		in fact, they intentionally wanted somebody who wasn't	10		and the Chair, which I think you're saying we're going
11		part of the Shareholder Team. It continues there:	11		to come on to, about having a Shareholder Non-Executive
12		" at the time of the appointment in 2012, the	12		Director and the kind of concern area, in particular,
13		Shareholder Team was in the process of negotiating the	13		was the funding because, whilst the Government had put
14		Funding Agreement with [Post Office] and we understand	14		in £1.34 billion in 2010, plus the debt agreement, at
15		that there was, therefore, resistance from [the Post	15		the time I arrived on the Board, the Post Office was
16		Office] to having a member of the Shareholder Team also	16		trying to agree a new funding agreement with the
17		sitting on the [Post Office] Board (where [the Post	17		shareholder.
18		Office's] approach to those negotiations would be	18		So that certainly is true that there was concern
19		discussed). This meant that the Shareholder	19		about that and the kind of conflict of interest concern
20		[Non-Executive Director], while a representative of ShEx	20		was, to my recollection, one of the reasons why I didn't
21		and performing a key role in terms of bringing	21		share the Board papers.
22		Government experience and perspective to the [Post	22		So I think paragraph 2.16 here is broadly correct.
23		Office] Board, was purposely detached from the	23		Of course, when it concerns you, you often want to make
24		Shareholder Team; a clear illustration of this being the	24		fine detail changes.
		_			-
25		fact that Board papers received by the Shareholder	25	Q.	Who did the Shareholder Team report to within the

1		Department?
2	Α.	Within the Department, the Shareholder Team was led at
3		Director, so after I'd gone on maternity leave, that was
4		Roger Lowe, he reported in to Mark Russell, the Director
5		General well, Stephen Lovegrove, actually, in 2012
6		and then Mark Russell, and they reported that role
7		reported into the Permanent Secretary of the Department
8		for what's now the Department for Business, it's had
9		a number of names.
10	Q.	How about yourself?
11	Α.	I reported into the DG of ShEx, so Stephen Lovegrove and
12		then Mark Russell in terms of this role. Obviously,
13		when I was at the Energy and Climate Change Department
14		I had a separate line for my day job.
15	Q.	So you had two lines of reporting?
16	Α.	Absolutely.
17	Q.	Can I take you to paragraph 54 of your witness
18		statement, please. Perhaps we could bring it up on to
19		screen it's WITN00920100., it's paragraph 54. Just
20		whilst we wait for that to come up, did the reporting
21		lines change when Richard Callard took over from you as
22		Non-Executive Director?
23	Α.	Richard Callard was my recollection is obviously
24		I wasn't in the team, but my recollection is that
25		Richard replaced Will Gibson, so he would have been
		17
1		was clear that I would be taking this role on my
2		maternity leave, then I was in a separate system, as it
3		were, and my role was backfilled. So that was the team
4		in the Shareholder Executive advising ministers, and
5		I was in a separate swim lane, if I could put it like
6		that.
7	Q.	I want to move on to your initial period as
8	-	Non-Executive Director, and could we please turn to
9		POL00046944. This is a letter you didn't see at the
10		time. Again, this is going back in time to August 2011,
11		but it may assist in matters that we will be shortly
12		turning to. This is one of the letters from Shoosmiths
13		on behalf of Julian Wilson that was sent to the Post
14		Office. If we scroll down, we can see the way that his
15		claim has been described, about halfway down that large
16		paragraph, it says:
17		"However, like other [subpostmasters] he found the
18		Horizon system extremely difficult in operation. He had
19		no effective way of monitoring or correcting
20		transactions that were input ed incorrectly. He
20		observed regularly discrepancies in the reports which he
21		considered were caused by the system itself. He kept
22		records of the discrepancies. He noted a number of
23		

occasions when the extent of discrepancies would

19

actually change whilst the store was closed."

24

25

		reporting into Anthony Odgers, who was then the Director
2		of the Royal Mail and Postal Services team, and then
3		into Mark Russell because that was later in 2013.
4	Q.	Thank you. Paragraph 54, it says as follows:
5		"As I was not part of the Shareholder Team directly
6		and was not involved in the day-to-day interaction
7		between Shareholder Team and ministers in this period,
8		l did not routinely take part in the drafting of
9		submissions to ministers on [Post Office] related issues
10		or their sign-off; nor did I assist with the preparation
11		of ministerial statements or answers to Parliamentary
12		questions."
13		We will see here a number of ministerial
14		submissions. Am I right in saying that they weren't
15		shared with you?
16	Α.	No, my recollection is I wasn't on the IT system. Had
17		I been on the IT system, I'm sure I would have been cc'd
18		on a lot of things. But because I was separate outside
19		the building, outside the office, I didn't routinely see
20		any of these interactions with ministers, nor was I part
21		of them.
22	Q.	So, in your view, it was intended that you would see
23		them but, as it happened, due to the technical issues
24		and your location, et cetera, it didn't happen or
25	Α.	No, I wouldn't put it like that. I think that once it
		18
1		It follows on to refer to a concern about remote
1 2		It follows on to refer to a concern about remote access.
2		access.
2 3		access. If we scroll over the page, please, we see there
2 3 4		access. If we scroll over the page, please, we see there that they say that it is denied, at (c), that the Post
2 3 4 5		access. If we scroll over the page, please, we see there that they say that it is denied, at (c), that the Post Office had grounds to prosecute Mr Wilson.
2 3 4 5 6		access. If we scroll over the page, please, we see there that they say that it is denied, at (c), that the Post Office had grounds to prosecute Mr Wilson. It goes on to describe various breaches of
2 3 4 5 6 7		access. If we scroll over the page, please, we see there that they say that it is denied, at (c), that the Post Office had grounds to prosecute Mr Wilson. It goes on to describe various breaches of obligations, if we scroll over the page, please, the
2 3 4 5 6 7 8		access. If we scroll over the page, please, we see there that they say that it is denied, at (c), that the Post Office had grounds to prosecute Mr Wilson. It goes on to describe various breaches of obligations, if we scroll over the page, please, the letter explains, over the page again. So there:
2 3 4 5 6 7 8 9		access. If we scroll over the page, please, we see there that they say that it is denied, at (c), that the Post Office had grounds to prosecute Mr Wilson. It goes on to describe various breaches of obligations, if we scroll over the page, please, the letter explains, over the page again. So there: "The Horizon system suffers with inherent defects
2 3 4 5 6 7 8 9 10		access. If we scroll over the page, please, we see there that they say that it is denied, at (c), that the Post Office had grounds to prosecute Mr Wilson. It goes on to describe various breaches of obligations, if we scroll over the page, please, the letter explains, over the page again. So there:
2 3 4 5 6 7 8 9 10		access. If we scroll over the page, please, we see there that they say that it is denied, at (c), that the Post Office had grounds to prosecute Mr Wilson. It goes on to describe various breaches of obligations, if we scroll over the page, please, the letter explains, over the page again. So there: "The Horizon system suffers with inherent defects and/or an unfair system of operation", and it goes on to set that out.
2 3 4 5 6 7 8 9 10 11 12		access. If we scroll over the page, please, we see there that they say that it is denied, at (c), that the Post Office had grounds to prosecute Mr Wilson. It goes on to describe various breaches of obligations, if we scroll over the page, please, the letter explains, over the page again. So there: "The Horizon system suffers with inherent defects and/or an unfair system of operation", and it goes on to set that out. I'm drawing that to your attention because we'll
2 3 4 5 6 7 8 9 10 11 12 13		access. If we scroll over the page, please, we see there that they say that it is denied, at (c), that the Post Office had grounds to prosecute Mr Wilson. It goes on to describe various breaches of obligations, if we scroll over the page, please, the letter explains, over the page again. So there: "The Horizon system suffers with inherent defects and/or an unfair system of operation", and it goes on to set that out. I'm drawing that to your attention because we'll move on shortly to the way the Shoosmiths litigation was
2 3 4 5 6 7 8 9 10 11 12		access. If we scroll over the page, please, we see there that they say that it is denied, at (c), that the Post Office had grounds to prosecute Mr Wilson. It goes on to describe various breaches of obligations, if we scroll over the page, please, the letter explains, over the page again. So there: "The Horizon system suffers with inherent defects and/or an unfair system of operation", and it goes on to set that out. I'm drawing that to your attention because we'll move on shortly to the way the Shoosmiths litigation was brought to the attention of the Board. Can we turn
2 3 4 5 6 7 8 9 10 11 12 13 14		access. If we scroll over the page, please, we see there that they say that it is denied, at (c), that the Post Office had grounds to prosecute Mr Wilson. It goes on to describe various breaches of obligations, if we scroll over the page, please, the letter explains, over the page again. So there: "The Horizon system suffers with inherent defects and/or an unfair system of operation", and it goes on to set that out. I'm drawing that to your attention because we'll move on shortly to the way the Shoosmiths litigation was brought to the attention of the Board. Can we turn first to your first Board meeting, and that is
2 3 4 5 6 7 8 9 10 11 12 13 14 15		access. If we scroll over the page, please, we see there that they say that it is denied, at (c), that the Post Office had grounds to prosecute Mr Wilson. It goes on to describe various breaches of obligations, if we scroll over the page, please, the letter explains, over the page again. So there: "The Horizon system suffers with inherent defects and/or an unfair system of operation", and it goes on to set that out. I'm drawing that to your attention because we'll move on shortly to the way the Shoosmiths litigation was brought to the attention of the Board. Can we turn first to your first Board meeting, and that is POL00021506. Your first Board meeting was 18 April
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16		access. If we scroll over the page, please, we see there that they say that it is denied, at (c), that the Post Office had grounds to prosecute Mr Wilson. It goes on to describe various breaches of obligations, if we scroll over the page, please, the letter explains, over the page again. So there: "The Horizon system suffers with inherent defects and/or an unfair system of operation", and it goes on to set that out. I'm drawing that to your attention because we'll move on shortly to the way the Shoosmiths litigation was brought to the attention of the Board. Can we turn first to your first Board meeting, and that is
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 7		access. If we scroll over the page, please, we see there that they say that it is denied, at (c), that the Post Office had grounds to prosecute Mr Wilson. It goes on to describe various breaches of obligations, if we scroll over the page, please, the letter explains, over the page again. So there: "The Horizon system suffers with inherent defects and/or an unfair system of operation", and it goes on to set that out. I'm drawing that to your attention because we'll move on shortly to the way the Shoosmiths litigation was brought to the attention of the Board. Can we turn first to your first Board meeting, and that is POL00021506. Your first Board meeting was 18 April 2012. We see there that you are listed. At that time
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18	A.	access. If we scroll over the page, please, we see there that they say that it is denied, at (c), that the Post Office had grounds to prosecute Mr Wilson. It goes on to describe various breaches of obligations, if we scroll over the page, please, the letter explains, over the page again. So there: "The Horizon system suffers with inherent defects and/or an unfair system of operation", and it goes on to set that out. I'm drawing that to your attention because we'll move on shortly to the way the Shoosmiths litigation was brought to the attention of the Board. Can we turn first to your first Board meeting, and that is POL00021506. Your first Board meeting was 18 April 2012. We see there that you are listed. At that time there are only two Non-Executive Directors; is that
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19	A.	access. If we scroll over the page, please, we see there that they say that it is denied, at (c), that the Post Office had grounds to prosecute Mr Wilson. It goes on to describe various breaches of obligations, if we scroll over the page, please, the letter explains, over the page again. So there: "The Horizon system suffers with inherent defects and/or an unfair system of operation", and it goes on to set that out. I'm drawing that to your attention because we'll move on shortly to the way the Shoosmiths litigation was brought to the attention of the Board. Can we turn first to your first Board meeting, and that is POL00021506. Your first Board meeting was 18 April 2012. We see there that you are listed. At that time there are only two Non-Executive Directors; is that correct?
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20	A.	access. If we scroll over the page, please, we see there that they say that it is denied, at (c), that the Post Office had grounds to prosecute Mr Wilson. It goes on to describe various breaches of obligations, if we scroll over the page, please, the letter explains, over the page again. So there: "The Horizon system suffers with inherent defects and/or an unfair system of operation", and it goes on to set that out. I'm drawing that to your attention because we'll move on shortly to the way the Shoosmiths litigation was brought to the attention of the Board. Can we turn first to your first Board meeting, and that is POL00021506. Your first Board meeting was 18 April 2012. We see there that you are listed. At that time there are only two Non-Executive Directors; is that correct? That's not correct. There was also Neil McCausland,
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	А.	access. If we scroll over the page, please, we see there that they say that it is denied, at (c), that the Post Office had grounds to prosecute Mr Wilson. It goes on to describe various breaches of obligations, if we scroll over the page, please, the letter explains, over the page again. So there: "The Horizon system suffers with inherent defects and/or an unfair system of operation", and it goes on to set that out. I'm drawing that to your attention because we'll move on shortly to the way the Shoosmiths litigation was brought to the attention of the Board. Can we turn first to your first Board meeting, and that is POL00021506. Your first Board meeting was 18 April 2012. We see there that you are listed. At that time there are only two Non-Executive Directors; is that correct? That's not correct. There was also Neil McCausland, who'd already joined but Virginia and I were, in effect,

reporting into Anthony Odgers, who was then the Director

- 24 a Non-Executive Chairman.
- 25 **Q.** Thank you very much. If we scroll down, we can see 20

1		there at POLB12/44 the Chairman welcomed Virginia Holmes	
2		and you to the Board.	:
3		If we scroll over the page, please, to page 4,	
4		halfway down page 4, it there notes your appointment.	
5		Slightly up, sorry. Thank you very much.	
6		Then over the page, we can see a number of noting	
7		papers and one of them is the Significant Litigation	
8	_	Report.	
9	Α.	Yes.	
10	Q.	Does anything stand out for you in terms of this initial	1
11		meeting? I mean, it looks from the papers to be	1
12		relatively brief, quite straightforward; is that a fair	1
13		summary or is it more complicated?	1
14	Α.	I've got quite clear memories of this meeting because it	ا ر
15		was my first one. So we were obviously in the Post	۱ ر
16 17		Office offices. It was the first meeting after	
17		separation, which was a fairly significant moment in the	ا ر
18 19		company's history. In terms of the Board itself, no,	
20		I think it was orderly. Obviously, I was both trying to contribute but also trying to navigate the environment.	
20 21		I wanted to see how Alice chaired it. I'd never met	2
21		these other Non-Executive Directors before, I wanted to	2
23		see how the Executive performed. So no, to my	2
24		recollection, it was fairly orderly.	2
25	Q.		2
		21	
1		papers were right at the back. We obviously would have	
2		read them all before but, to my memory at this meeting,	
3		this paper was in amongst some others around health and	
4		safety at work, those kinds of issues. I don't recall	
5		it being discussed at that meeting, I'm sorry to say.	
6	Q.	Having noted that it was at the back, is that are we	
7		to understand that it was guite low down the list of	
8		priorities?	
9	Α.	I think noting papers by their nature come after the	
10		papers that are for discussion.	1
11	Q.	Being at the back of the noting papers, is there	1
12		anything we can read into that or is that just how it	1
13		occurred?	1
14	Α.	I I mean, I didn't mean it like that per se. I think	1
15		the Chairman and the Company Secretary would have	1
16		ordered the papers. I'm simply saying that was how	1
17		I received it.	1
18	Q.	Thank you. Can we please turn to POL000	1
19	SIR	<b>WYN WILLIAMS:</b> Before we do, is that it, one page, or	1
20		can I just see the whole document?	2
21	MR	BLAKE: Absolutely. If we scroll over the page, there is	2
22		one other entry that is redacted and, if we scroll over,	2
23		we can see there's nothing else.	2
24		<b>WYN WILLIAMS:</b> Right. Okay, thank you. Yeah.	2
25	MR	BLAKE: If we turn to POL00021507, this is a 23 May 2012	2
		23	

1		That can be found at UKGI00018251.
2		This is the first Significant Litigation Report that
3		you will have received. There's a section there for
4		claims over £500,000 or those of a sensitive nature.
5		It's here that it addresses the Shoosmiths claim. It
6		says:
7		"The Post Office has received notification of
8		a total of five claims from former subpostmasters.
9		"Each alleges wrongful termination of contract
10		(based on (a) alleged defects in Post Office's internal
11		processes and (b) alleged defects with Horizon). Each
12		are seeking damages in the sum of circa £150,000.
13		"Four of the five claims remain at the pre-action
14		stage"
15		A fifth has been struck the out. It says:
16		"Shoosmiths assert that they have consulted on
17		a further 85 cases, which are likely to raise similar
18		legal issues."
19		We saw that was a noting paper. Was there any
20		discussion whatsoever about that at that stage?
21	Α.	I don't recall any discussion of this paper at that
22		meeting and just, if it's helpful to give colour, Board
23		papers in those days were hard copy so we would have
24		a lever arch file with all of them in and they'd follow
25		the chronological order of the meeting and these noting
		22
1		Board meeting. By now Alasdair Marnoch is actually
1 2		Board meeting. By now, Alasdair Marnoch is actually named there as present and I know that you said that at
2		named there as present and I know that you said that at
2 3		named there as present and I know that you said that at the earlier meeting, he had already been appointed,
2 3 4	А.	named there as present and I know that you said that at the earlier meeting, he had already been appointed, or
2 3 4 5	A. Q.	named there as present and I know that you said that at the earlier meeting, he had already been appointed, or I was referring to Neil McCausland.
2 3 4 5 6	Q.	named there as present and I know that you said that at the earlier meeting, he had already been appointed, or I was referring to Neil McCausland. Ah, sorry.
2 3 4 5 6 7		named there as present and I know that you said that at the earlier meeting, he had already been appointed, or I was referring to Neil McCausland. Ah, sorry. Yeah, who actually joined, I think in Q4-2011, alongside
2 3 4 5 6 7 8	Q.	named there as present and I know that you said that at the earlier meeting, he had already been appointed, or I was referring to Neil McCausland. Ah, sorry. Yeah, who actually joined, I think in Q4-2011, alongside Alice. I think perhaps you didn't pick him up because
2 3 4 5 6 7 8 9	Q.	named there as present and I know that you said that at the earlier meeting, he had already been appointed, or I was referring to Neil McCausland. Ah, sorry. Yeah, who actually joined, I think in Q4-2011, alongside Alice. I think perhaps you didn't pick him up because he's down as Senior Independent Director but, obviously,
2 3 4 5 6 7 8 9	Q. A.	named there as present and I know that you said that at the earlier meeting, he had already been appointed, or I was referring to Neil McCausland. Ah, sorry. Yeah, who actually joined, I think in Q4-2011, alongside Alice. I think perhaps you didn't pick him up because he's down as Senior Independent Director but, obviously, he's a Non-Executive Director.
2 3 4 5 6 7 8 9 10 11	Q.	named there as present and I know that you said that at the earlier meeting, he had already been appointed, or I was referring to Neil McCausland. Ah, sorry. Yeah, who actually joined, I think in Q4-2011, alongside Alice. I think perhaps you didn't pick him up because he's down as Senior Independent Director but, obviously, he's a Non-Executive Director. Yes, well, now we have another Non-Executive Director,
2 3 4 5 6 7 8 9 10 11 12	Q. A.	named there as present and I know that you said that at the earlier meeting, he had already been appointed, or I was referring to Neil McCausland. Ah, sorry. Yeah, who actually joined, I think in Q4-2011, alongside Alice. I think perhaps you didn't pick him up because he's down as Senior Independent Director but, obviously, he's a Non-Executive Director. Yes, well, now we have another Non-Executive Director, Alasdair Marnoch. If we scroll down, we can see the
2 3 4 5 6 7 8 9 10 11 12 13	Q. A.	named there as present and I know that you said that at the earlier meeting, he had already been appointed, or I was referring to Neil McCausland. Ah, sorry. Yeah, who actually joined, I think in Q4-2011, alongside Alice. I think perhaps you didn't pick him up because he's down as Senior Independent Director but, obviously, he's a Non-Executive Director. Yes, well, now we have another Non-Executive Director, Alasdair Marnoch. If we scroll down, we can see the Chairman welcomed Alasdair Marnoch to the Board as
2 3 4 5 6 7 8 9 10 11 12 13 14	Q. A.	named there as present and I know that you said that at the earlier meeting, he had already been appointed, or I was referring to Neil McCausland. Ah, sorry. Yeah, who actually joined, I think in Q4-2011, alongside Alice. I think perhaps you didn't pick him up because he's down as Senior Independent Director but, obviously, he's a Non-Executive Director. Yes, well, now we have another Non-Executive Director, Alasdair Marnoch. If we scroll down, we can see the Chairman welcomed Alasdair Marnoch to the Board as Non-Executive Director and the Chairman of the Audit,
2 3 4 5 6 7 8 9 10 11 12 13 14 15	Q. A.	named there as present and I know that you said that at the earlier meeting, he had already been appointed, or I was referring to Neil McCausland. Ah, sorry. Yeah, who actually joined, I think in Q4-2011, alongside Alice. I think perhaps you didn't pick him up because he's down as Senior Independent Director but, obviously, he's a Non-Executive Director. Yes, well, now we have another Non-Executive Director, Alasdair Marnoch. If we scroll down, we can see the Chairman welcomed Alasdair Marnoch to the Board as Non-Executive Director and the Chairman of the Audit, Risk and Compliance Subcommittee.
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16	Q. A.	named there as present and I know that you said that at the earlier meeting, he had already been appointed, or I was referring to Neil McCausland. Ah, sorry. Yeah, who actually joined, I think in Q4-2011, alongside Alice. I think perhaps you didn't pick him up because he's down as Senior Independent Director but, obviously, he's a Non-Executive Director. Yes, well, now we have another Non-Executive Director, Alasdair Marnoch. If we scroll down, we can see the Chairman welcomed Alasdair Marnoch to the Board as Non-Executive Director and the Chairman of the Audit, Risk and Compliance Subcommittee. Could we please turn to page 4, and I think this is
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2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18	Q. A.	named there as present and I know that you said that at the earlier meeting, he had already been appointed, or I was referring to Neil McCausland. Ah, sorry. Yeah, who actually joined, I think in Q4-2011, alongside Alice. I think perhaps you didn't pick him up because he's down as Senior Independent Director but, obviously, he's a Non-Executive Director. Yes, well, now we have another Non-Executive Director, Alasdair Marnoch. If we scroll down, we can see the Chairman welcomed Alasdair Marnoch to the Board as Non-Executive Director and the Chairman of the Audit, Risk and Compliance Subcommittee. Could we please turn to page 4, and I think this is the section that you referred to earlier about concerns about the role of the ShEx Non-Executive Director. It
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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	Q. A.	named there as present and I know that you said that at the earlier meeting, he had already been appointed, or I was referring to Neil McCausland. Ah, sorry. Yeah, who actually joined, I think in Q4-2011, alongside Alice. I think perhaps you didn't pick him up because he's down as Senior Independent Director but, obviously, he's a Non-Executive Director. Yes, well, now we have another Non-Executive Director, Alasdair Marnoch. If we scroll down, we can see the Chairman welcomed Alasdair Marnoch to the Board as Non-Executive Director and the Chairman of the Audit, Risk and Compliance Subcommittee. Could we please turn to page 4, and I think this is the section that you referred to earlier about concerns about the role of the ShEx Non-Executive Director. It says there: "Susannah Storey outlined the reasons for representation of ShEx on the Board of [the Post Office]. She confirmed that ShEx representatives would have exactly the same legal responsibilities as other

1		clarified that she would not be sharing the Board papers	1		n
2		with colleagues in ShEx."	2		s
3		Whose decision was that, not to share Board papers;	3		ti
4		was that yours or somebody else's?	4	Q.	Т
5	Α.	I covered this in my witness statement and I tried to be	5		it
6		as fulsome there as I could recollect. The documents	6		c
7		unfortunately don't really help me with exactly when	7		t
8		this was discussed and how it was decided but my sort of	8	Α.	Т
9		reflection now, I guess, is that, given the nervousness	9		а
10		of the Chairman about having a shareholder	10		t
11		representative at all and about the conflict of interest	11		s
12		around the funding review, I would have been mindful of	12		t
13		that, and I think I was and again, I'm overlaying	13		r
14		this now, I can't recall exactly how it happened but	14		а
15		I think I would have been very keen to ensure that we	15		h
16		didn't end up with a sort of two-tier Board.	16		V
17		So my worry was that, because they were so nervous	17		s
18		about documents and interfaces with the shareholder, the	18		n
19		worst of all worlds for this new April 2012 moment would	19		а
20		have been if the Board had sort of had two rooms, one	20		
21		where they discussed all the contentious things and then	21		V
22		a very vanilla Board that I was, such that they felt the	22		v
23		papers could be shared.	23		C
24		So I think it must have been an agreement between	24		S
25		Alice and I that I wouldn't share and I guess I was also 25	25		h
1		conversation of a subcommittee of the Board that	1		s
2		I wouldn't be on, and I pushed back on that. In	2		e
3		November 2012, she expressed discontent that I was	3		
4		talking to Will Gibson about what was happening at the	4		t
5		Board meeting, and I note that, even when Richard	5		а
6		Callard became the shareholder representative in April	6		e
7		2014, the whole Shareholder Team, I understand, was	7		if
8		required to sign non-disclosure agreements to receive	8		
9		those papers.	9		p
10		So there was a deep-seated concern from this company	10		s
11		about the shareholder and access to information.	11		а
12	Q.	You said "she, she, she" but then you said "the	12		i
13		company". Was it in particular the Chairman or was it	13		"
14		more broadly?	14		
15	Α.	I think the reason I described it like that was because	15		C
16		my conversations would have been the Chairman at the	16		Ν
17		time, and all the way thorough on this issue. I don't	17		t
18		think it was only her but, if you were to ask me exactly	18		ŀ
19		who else, I don't have particular basis to say a list of	19		J
20		people. I do know from my work with the Royal Mail	20		n
21		before that there was a sort of institutional concern	21		C
22		about the shareholder on some matters.	22		f
23	Q.	It then says:	23		f
24		"The Board discussed possible conflicts. Susannah	24		
25		Storey believed that the areas of possible conflict	25		C
		27			

1		mindful of the fact, in practical terms, I wasn't quite
2		sure how I would share those hard copy papers at that
3		time.
4	Q.	Thank you. You've said concerns from the Chairman. Was
5		it just Alice Perkins that had a concern about the role
6		of the Non-Executive Director representing ShEx, or were
7	_	there others?
8	Α.	There are papers noting a meeting between Alice Perkins
9		and Martin Donnelly, who was the Permanent Secretary at
10		the Department for Business in the autumn of 2011, where
11		she is reported to have set out her concerns, and, in
12 13		those papers, she says that one of the other non-executives wouldn't serve on a Board with
13		
14		a shareholder representative. I knew that, I knew that
15 16		had been reported, because there was a bit of a debate with the ministers and, obviously, Vince Cable ended up
17		sending his Chairman's letters to her in January 2012 to
18		make clear that the Government would require
19		a shareholder representative.
20		But I didn't know whether those concerns were more
20		widely held or exactly who held them. I did discuss it
22		with Alice and, actually, you know, going forward in the
23		chronology, even after I'd said this, there was still
24		some serious concern that carried on for a long time.
25		In May 2012, she proposes a separate funding
		26
1		should be easy to anticipate, funding being a good
2		example.
3		"The Chairman thanked Susannah Storey for clarifying
4		the role of the Director appointed to represent ShEx and
5		asked members of the Board to flag up any concerns,
6		either at the time of the meeting or to her separately
7		if they were more comfortable."
8		Could we now turn to the bottom of page 7 and into
9		page 8. I think this is the first mention in the
10		substantive Board minutes, at the bottom of this page
11		and over to the next, of matters relating to the Horizon
12		issues, as we know them, and it's a section there under
13		"Any Other Business" and it says:
14		"Paula Vennells and the Chairman updated the Board
15		on the meeting with James Arbuthnot MP and Oliver Letwin
16		MP, taking them through their constituency cases which,
17		they believed, that challenged the integrity of the
18		Horizon system. The meeting had been a success and
19		James Arbuthnot had now agreed to facilitate another
20		meeting with the other MPs who also had cases in their
21		constituencies. The business had also agreed to use
22		forensic accountant to investigate the system and give
23		further comfort to those concerned about these cases."
24		This is under "Any Other Business". Was it a matter
25		of discussion, do you recall? 28

(7) Pages 25 - 28

Α.	It's obviously very difficult to separate out hindsight	1	Α.	Well, clearly now I would have a very strong preference
	and all the other documents that I've now read and, you	2		for a whole set of different events on this issue.
	know, all of the awful things that have happened when	3		I think at the time, as my second Board meeting, I was
	I look back at this but I do reflect that there was	4		still navigating this company and this environment.
	a conversation about this, even though it was under "Any	5		I don't particularly recall thinking that at that time.
	Other Business". It was quite unusual for well, it	6		But it obviously is, as we all know now, a very
	was only the second Board, so but it was, I guess,	7		significant thing that they were telling us about. So,
	interesting that the Chairman and Paula were updating us	8		yes, perhaps not best placed in "Any Other Business".
	together. So I would have noted it, yeah, and I think	9	Q.	Could we please turn to UKGI00000065. This is another
	there was a bit of a discussion but I can't recall all	10		ministerial submission, new minister, from Mr Whitehead.
	of the ins and outs of what were debated.	11		It says as follows:
Q.	What did you mean by "interesting"?	12		"Meeting with Alan Bates [so this is another meeting
Α.	Interesting in relation to the Chairman and the Chief	13		with Mr Bates, Sir Alan now] at his request to discuss
	Executive?	14		the JFSA's claims its members are victims of endemic
	Yes.	15		flaws in Post Office's Horizon system which, over the
Α.	Well, because mostly papers were presented by Executive	16		last 10 years or so have resulted in a number of
	Directors or members of the Executive Team and, in this	17		subpostmasters having their contracts wrongly terminated
	instance, it is both the Chairman and the Chief	18		by [the Post Office], with many also prosecuted for
	Executive who had met these two MPs and then were	19		false accounting."
	proposing the forensic accountant to be brought in to	20		Then it lists the attendees. We have Sir Alan
_	investigate the system.	21		Bates, and then we have Issy Hogg:
Q.	Is it something that you would have expected a paper to	22		" a partner at Coomber Rich (Basingstoke based
	have been produced beforehand, or is it appropriate, in	23		solicitors who have defended a number of subpostmasters
	your view, for that to have been raised under "Any Other	24		who have been prosecuted by [the Post Office] in recent
	Business"? 29	25		years)." 30
	This submission details the various background to	1		between whatever meeting Norman Lamb whatever
	This submission details the various background to the meeting. If we scroll down, we can see the	1		between whatever meeting Norman Lamb whatever meetings he was doing nor particularly about this one
	the meeting. If we scroll down, we can see the	2		meetings he was doing nor particularly about this one.
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I wouldn't routinely have known about the meeting Α.

Α.

Q.

Q.

(8) Pages 29 - 32

	That's right. prior to Board meetings, regularly, occasionally?	1 2		become more difficult, not least because obviously I was less current in terms of the information and obviously.
3 <b>A</b> .		3		by this stage, the Postal Services Minister was Norman
4 5	before and after Board meetings. If there was anything ad hoc that occurred to him or occurred to me that we	4		Lamb, then when it changed to Jo Swinson, I didn't know her and I hadn't worked with her.
5 6		5	~	
0 7	thought was relevant to the other, we would have	6	Q.	Thank you. Can we please turn to POL0002158, taking y
	absolutely passed it on. We had a very regular dialogue	7		to another Board meeting, this time 4 July 2012. We can
8	and, in a way, that was the corollary of the fact that	8		see that you were present at that meeting. If we turn,
9 10	I was out of the office. So it was to seek to ensure that what I understood to be happening at the Board and	9 10		please, to page 6, we can see there reference to James
10		10		Arbuthnot and it says:
12	what he understood to be going on in the Government's mind about Post Office we could, to the best extent	11		"The Chairman updated the Board on the meeting
13		12		taking place on 4 July between James Arbuthnot and Second Sight, Forensic Accountants. She promised to
	possible, noting the structural obstacles, we could share that information.	13		
14		14		keep them informed."
15 <b>Q</b> .	, , ,	15		Do you recall at this Board meeting there being any
16 17	processes set up for the sharing of information with			significant discussion of that issue?
	you? Do you mean formally from the Shareholder Team or the	17 18	А.	I recall this Board meeting because it was at the
18 <b>A.</b> 19	Government to	18		Gatwick Mail Centre, which was unusual. So that was
		20		one we used to try to go to different places to do
20 Q. 21 A.	From exactly, both. Either. No, not formal <i>per se</i> , in the way of saying right on	20		the Board meeting. I don't recall this particularly. I note now, of course, that it was the Chairman updating
21 <b>A.</b> 22	a Monday this will happen but it was regular, the	21		it us, as a Board.
23	conversations between us. So I didn't feel at the	22	0	What's the significance of it being from the Chairman?
23 24	beginning that I wasn't clear about what was going on.	23 24	Q. A.	It's the point I was making that, if you look through
24 25	I think it's fair to say that, over time, that did	24 25	A.	the papers, the way it would normally work would be the
	33			34
1	Chief Executive would be telling us. So I would have,	1		page 2, there's a section on what's described as
2	I think, been reassured that this was being taken	2		"Arbuthnot activity":
3	seriously and the Chairman herself was engaging in the			" arrangements have been made with James
4		3		
	meetings with Mr Arbuthnot.	3		Arbuthnot's office to refer through cases suggested by
5 <b>Q</b> .	meetings with Mr Arbuthnot. If we turn, please, over the page, we can see that			MPs for review to him which would then be sent to
	meetings with Mr Arbuthnot. If we turn, please, over the page, we can see that there's another Significant Litigation Report being	4		MPs for review to him which would then be sent to Second Sight. It is not yet clear how many cases will
5 <b>Q</b> . 6 7	meetings with Mr Arbuthnot. If we turn, please, over the page, we can see that there's another Significant Litigation Report being noted and we can see, again, that Significant Litigation	4 5		MPs for review to him which would then be sent to Second Sight. It is not yet clear how many cases will be involved but we believe that it currently remains in
5 <b>Q</b> . 6 7 8	meetings with Mr Arbuthnot. If we turn, please, over the page, we can see that there's another Significant Litigation Report being noted and we can see, again, that Significant Litigation Report at POL00096747. Similar information to that	4 5 6 7 8		MPs for review to him which would then be sent to Second Sight. It is not yet clear how many cases will be involved but we believe that it currently remains in single figures (although it may yet grow)."
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2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17	Q. A.	be meeting the Post Office team all the time, very, very regularly. Sometimes they'd be going to their offices, they'd be meeting on a whole range of things. So that in itself wouldn't have triggered a specific meeting but the way I tried to manage my time was to meet him before or after Boards, or before or after some committee or other meeting I was having with the Post Office. He would have been in a very regular interaction, I would have thought, with the Post Office. Was it always verbal briefings between himself and yourself or did they produce, for example, packs of information for you, updating you, from time to time? No, I don't remember any packs of information coming	2 3 4 5 6 7 8 9 10 11 12 13 14
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13 14 15 16	Α.	information for you, updating you, from time to time?	13
14 15 16	Α.		
15 16	Α.	No, I don't remember any packs of information coming	14
16			
		from them. I think it was it would always have been	15
17		us speaking on the telephone or meeting to discuss. We	16
		did have some emails but often that was logistics,	17
18		setting up a meeting.	18
19	Q.	Could we please turn to POL00103348. Moving on to the	19
20		19 September 2012 Board meeting. Can we please turn to	20
21		page 90. This is a whole pack. This is something that	21
22		you've addressed in your witness statement. It's the	22
23		Significant Litigation Report, as at September 2012. So	23
24		this is now separated out between Part (A), which is	24
25		"Civil Claims", and Part (B), which is on page 93, which 37	25
1		recall it particularly being an issue from the	1
2		separation work because my team had led a lot of that.	2
3	~	So no, at this stage, I didn't read it like that.	3
4	Q.	Again, am I right to say that this was simply a paper	4
5		for noting at the Board?	5
6	A.	Yes.	6
7	Q.	Yes. Looking at it now, do you think that there was	7
8		a lack of curiosity at Board level when it came to these	8
9		Significant Litigation Reports: the fact, for example,	9
10		that they are just noting papers?	10
11 12	Α.	Looking at all of this now, and I've tried to be very reflective in my witness statement, I think there's lots	11
			12
13 14		of things that could have been done differently and, of course, you know, when you see these words on the page	13 14
14		now, and you know what happened, absolutely. I wish	14
16		they'd been the first item on the agenda. And I think,	16
17		when you go through chronology, once we had the Second	17
18		Sight Interim Report, every single Board after that,	18
19		there was a discussion of these issues. But at this	19
20		time, in the autumn of 2012, unfortunately that wasn't	20
20		the case.	20
21	Q.	If we draw the threads together from all of the	21
22	α.	documents that we've just been looking at this morning,	23
23		we started with the Shoosmiths Letter of Claim relating	23
24		to Horizon issues mentioning prosecutions. We then have	25
20		39	20

1		is "Criminal Cases". Thank you. It says, "Criminal
2		Cases Brought by Post Office Limited".
3		First of all, it looks as though these reports are
4		slightly more sophisticated than the earlier ones. Was
5		that your recollection?
6	Α.	They were getting slightly longer and more detailed,
7	~	yes.
8	Q.	Do you recall any discussion about the reasons for that?
9 10	Α.	No, I don't recall a discussion. I mean, obviously by
10		September 2012, the forensic accountants had been appointed and were undertaking their work, so my
12		assumption was that was the vehicle through which we
13		would hopefully learn more about this.
14	Q.	Although Part (B) describes it as "Principal Cases
15		Brought by Post Office Limited", I think you've said in
16		your witness statement that you weren't aware that Post
17		Office Limited was itself bringing prosecutions?
18	Α.	That's right. I had a sort of layman's understanding,
19		I suppose. I didn't fully appreciate until the July
20		2013 conversations exactly what the Post Office was
21		doing. My experience, generally, is companies do things
22		sometimes with bespoke statutory obligations that enable
23		them to do these kinds of things. I didn't have any
24		recollection of this prosecution issue coming up when we
25		were doing the Postal Services 2011 Act work. I didn't 38
1		the Significant Litigation Reports that refer to the
1 2		the Significant Litigation Reports that refer to the Shoosmiths claim, although not in that level of detail.
1 2 3		the Significant Litigation Reports that refer to the Shoosmiths claim, although not in that level of detail, and refer to, for example, 85 potential cases. You then
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(10) Pages 37 - 40

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1 wonder why you didn't see the picture on the front	of
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- 2 the box. But, at the time, from what we saw, we'd seen
- 3 a much smaller set of information than even the
- 4 documents you're just outlining.
- 5 Q. Was it ever suggested to you that you should, for
- example, meet with Second Sight or meet with JamesArbuthnot?
- 8 A. No, unfortunately not and, as I've set out in my
- 9 reflections to my statement, that is one of the things
- 10 that I regret. Sir Alan Bates and James Arbuthnot were
- 11 meeting really quite a few MPs, they were meeting our
- 12 ministers and they were meeting the Chairman and the
- 13 Chief Executive. We, the Board, didn't meet them and
- 14 I guess, as I was saying, because Alice Perkins and15 Paula Vennells were giving us updates, we took some
- 16 comfort from that.
- 17 Q. I think in your witness statement you've said that you
- 18 received an unequivocal message that the Executive had
- complete confidence in the accuracy, integrity androbustness of the Horizon system. Was that at this
- 21 stage?
- A. That was really all the way thorough. I mean, I mentionin my statement that, even attached to the lines around
- 24 the BBC Inside Out programme in 2011, there was a kind
- 25 of press notice or public comments from the Post Office 41
- 1 Strategy Director at that Department.
- 2 Q. Was it at that time that you stepped back from the Audit3 and Risk Committee?
- 4 A. Yes, that's my recollection, yes. So in March 2013.
- 5 **Q.** Looking back at it now, do you think that that was
- a particularly important committee for somebody withthose Government links or ShEx links to have beensitting on?
- 9 A. Well, the -- if we go back to that 2012 letter to the
- 10 Chairman, the pensions issue was really very front of
- 11 mind, so when we separated the company and the
- 12 Government had taken on these huge liabilities, we were
- 13 worried to ensure that the pension remained sustainable.
- 14 So I personally was quite worried about that issue
- 15 because I knew it was in the Government's mind. In
- 16 a general sense, yeah, I think Audit and Risk is
- 17 an important Board committee.
- 18 Q. Did anybody step in to fill that role?
- 19 A. The Audit and Risk Committee was Chaired by Alasdair
- 20 Marnoch and had other non-executive members and
- 21 obviously the Finance Director. Nobody from the
- 22 Shareholder Team would have done that but,
- constitutionally, I'm not sure how that could haveworked.
- 25 SIR WYN WILLIAMS: Before we move on, could we have that 43

- very unequivocal. My recollection of really all the conversations at this stage were "robust system, nothing to see here", that kind of sentiment. Yes, absolutely.
  Q. As the person on the Board who had a link to the Government or a link to the Civil Service, do you think that, at that point in time, you should have been
- 7 probing more on those issues?
- 8 A. I think -- I suspect all of the NEDs feel, whatever the
- 9 hats they were wearing, and I certainly feel now, on
- 10 reflection, of course, I wish that we had, from the
- 11 beginning, done a series of things in a different way.
- 12 I did expect, and I've now seen documents to illustrate,
- 13 that the Shareholder Team from 2010, when Ed Davey was
- 14 asking, 2011, they were going back and forth to the Post
- 15 Office on this issue, and they were continuing to get
- 16 those unequivocal messages and they were getting more
- detail that the Post Office was saying supported thosethings.
- 19 **Q.** By March 2013, you had returned full time to your day
- 20 job at the Department for Energy and Climate Change,
- 21 your new role. I think you've described it in your
- 22 witness statement as a demanding role; is that fair?
- 23 A. I think anybody finishing maternity leave finds their
- 24 new jobs reasonably demanding but, yes, it was
- 25 a demanding job. I was doing a job share, we were 42
- 1 litigation report back on the screen, so that I can see 2 the next page. 3 MR BLAKE: Absolutely, sir. It's POL00103348, page 90. The 4 section with the criminal cases is page 93. 5 SIR WYN WILLIAMS: Yes, just the next page, please. So 6 we've got four criminal cases under Part (B) on that, 7 and then it goes on. That's what I wanted to see. Yes. 8 MR BLAKE: I think that's the final page of --SIR WYN WILLIAMS: Yes. I understand that this paper was 9 10 for noting but, for the first time, as I understand it, 11 the Board is being given information about completed and 12 ongoing criminal cases, yes? Just glancing at them, 13 some of them are very significant. Someone has pleaded 14 guilty to stealing over £100,000 on the page we are 15 looking at; two brothers are accused of fraudulently 16 obtaining or stealing over £200,000. 17 Forgive me if I'm a little surprised that nobody 18 thought to discuss these things but that appears to be 19 the case. 20 Α. Well, I agree with you and, you know, when you look at 21 this page now, absolutely. I can't recall the 22 discussion but it's actually hard for me to recall --23 SIR WYN WILLIAMS: I'm not for a minute suggesting you 24 should remember the words spoken but the impression 25 I get from you -- so now is your chance to correct it --

1		that because this paper was to be noted, there was
2		literally no discussion of it and, you know, I'm not
3		hiding it, I'm expressing my surprise that a Board, for
4		the first time confronted with this sort of detail,
5		doesn't discuss it at all.
6	Α.	Yeah, and I mean I agree with you and I don't recall
7		a discussion. I also don't recall anybody highlighting
8		it to us either. But I totally take your point.
9		WYN WILLIAMS: Yes, sorry, Mr Blake.
10	MR	<b>BLAKE:</b> Sir, that might be an appropriate moment to take
11	010	our first break of the morning.
12 13		WYN WILLIAMS: Very good. BLAKE: Can we come back at 11.15?
13		WYN WILLIAMS: Yes.
14	-	BLAKE: Thank you.
16		.06 am)
17	(11	(A short break)
18	(11	.18 am)
19	•	WYN WILLIAMS: Yes, Mr Blake?
20		<b>BLAKE:</b> Sticking with the agenda for 19 September 2012,
21		that's POL00103348, we see there, for example, item 11
22		is discussion of the British Postal Museum and archive
23		funding. Is it odd that something like the Postal
24		Museum might be an item for discussion but the
25		prosecution that led to, for example, imprisonment for
		45
1		busy time for you in your ordinary day job; is that
2		correct?
3	Α.	Not June and July no, in my day job. That was only
4		a particular issue in October/November 2013. So this
5		period, it was just ordinary day job.
6	Q.	Thank you. If we scroll down, we can see an email there
7		from Martin Edwards, the Chief of Staff to Paula
8		Vennells, emailing the ShEx team to arrange a meeting
9		for Alwen and I think either Martin Edwards or possibly
10		Paula Vennells, with Will, Mike and Peter, and the topic
11		being the "[Post Office]/BIS meeting on Second Sight
12		investigation".
13		Is that something you would have been updated on by
14		the ShEx team?
15	Α.	I don't recall being updated on this issue on 28 June
16		because on 1 July, when we did have that Board call,
17 18		that was a surprise to us as a Board. 1 July was a Monday, so it's possible this was late the previous
18 19		week and, therefore, I hadn't had a chance to talk to
19 20		Will Gibson. Also this is setting up a meeting, isn't
20 21		it, rather than actually discussing the issue.
22	Q.	And if we please turn to UKGI00001656, we see another
23		email from Mr Edwards in the middle of that page,
24		please, emailing, again, the ShEx team in relation to
25		the James Arbuthnot meeting:
		47

	they felt there was an issue of sufficient materiality,
	it would they could put it as an item on a future
	meeting.
	And we would look at the forward look, perhaps, for
	a year ahead but not I don't remember shaping the
	agenda myself.
Q.	Moving now to June 2013, could we please turn to
	POL00167917. The June/July period 2013 was
	a particularly busy time in matters relating to the
	Horizon system, and I think that was also a particularly
	46
	"We thought it might be helpful for you to see this
	brief which we prepared for the meeting with Arbuthnot
	this morning, to give you a clearer picture of both the
	facts and handling issues at play
	"Obviously strictly [private and confidential] but
	happy for you to share some or all of it with Jo
	[I think that's Jo Swinson, the then Minister] if you
	believe that would be helpful I'll let you judge
	(useful to know ahead of Paula's call with her so she
	knows what she's sighted on)."
	If we scroll over the page, we can see a copy of the
	briefing. Perhaps we could look at page 4 and 5
	quickly. We have looked at this with other witnesses.
	This is a briefing note on prior to the meeting with
	now Lord Arbuthnot. We can see at the bottom of page 4,
	"Additional point if needed": "Depending on the note of the meeting, it may be
	appropriate to address head on [James Arbuthnot's]
	appropriate to address read on [James Arbutmots] apparent annoyance at the issues around prosecutions and
	systems 'exceptions'."
	Just pausing there on the word "exceptions"; were
	you aware around this time of the use of terminology
	within the Post Office referring to, for example, bugs
	as "exceptions" or "anomalies"?
Α.	No, I wasn't familiar with any of that and I don't
А.	48
	(12) Pages 45 - 48

two years, sentencing to 20 months, et cetera, that's

outlined in the Significant Litigation Report, wasn't

A. Of course, and I think it would be impossible not to

Non-Executive Directors, would follow that.

A. Not routinely. I think, if -- for example, I am

would be on the agenda?

**Q.** Did you ever have the opportunity to input into what

take that few now, looking at this. At the time, as

I think I said in my witness statement and is normal

with all corporate governance, the agendas, the rhythm

assuming if one of the committee chairs, say Alasdair

Marnoch, who Chaired the Audit and Risk Committee, or

Virginia Holmes, who chaired the Pension Committee, if

of meetings would be set by the Chairman and we as the

more of a discussion at Board level.

(12) Pages 45 - 48

1	think, as a Board, we had even particularly focused on	1		well, we never got this document, as far as I know.
2	this issue of bugs that obviously came out in the Second	2	Q.	Is this an example where it might have been better for
3	Sight Interim Report.	3		you in your role to have been based at the Department,
4 <b>Q</b> .	If we scroll down, there's a section there on "Current	4		or within ShEx, or within the broader Department?
5	prosecutions". If we scroll down, we can see a further	5	Α.	I have set out in my statement that one of the reasons,
6	entry on "Historical convictions", and it is there we've	6		when I decided to resign a year early from the Board, in
7	addressed with other witnesses. It says:	7		part it was because I thought it was actually difficult
8	"Nothing has emerged from the interim findings given	8		to do the job of Shareholder Non-Executive Director and
9	to us by [Second Sight] which would point to specific	9		not be in the team, and I thought it was better that my
10	convictions being unsafe."	10		successor, there was just one line, that individual was
11	Then it addresses "System exceptions".	11		in the Board and they were completely immersed in the
2	So we've seen that this briefing has been copied to	12		Shareholder Team, the advice to ministers, and all of
13	ShEx but was that the kind of thing that would be shared	13		those things. And this is an example to where the
14	with you?	14		Shareholder Team knew more than the Board.
5 <b>A</b> .	No, and I mean this particular week from Monday, 1 July	15	Q.	Thank you. Moving to the Second Sight Report and
6	2013, onwards, was obviously very intense in a number of	16		receipt of the report, can we please turn to
7	layers but, having now seen a lot more of the	17		POL00145185. We're now on 4 July. Paula Vennells does
8	information, my perspective is that the least informed	18		send the Board an update, and I'm going to read to you
9	group at this point were the Board. So we had had	19		just a few passages from this update. It begins:
20	a call on 1 July. This is, I think, a briefing for	20		"I wanted to send you a brief email to update you on
21	Paula Vennells to meet Lord Arbuthnot, which is then	21		where we are with the Second Sight investigation."
22	being shared with the Shareholder Team, and the Post	22		Second paragraph, around halfway through, it says as
23	Office team are sharing quite a lot of information with	23		follows:
24	the Shareholder Team that week.	24		"In line with our discussion on Monday's Board call,
25	We, the Board, at this stage, hadn't had this	25		we understand that they have not found any evidence yet
	49			50
1	of systemic issues with the Horizon system (and it	1		surprised that this forensic accountants' work, that had
2	should be noted that this is based on a detailed review	2		been going on for over a year, was suddenly coming and
3	of the four 'best' cases in terms of compelling	3		we hadn't seen it. But, in terms of the findings of
4	evidence). However, as expected, they do intend to draw	4		that Interim Report, all we knew was these kinds of
5	attention to wider failings in the training and support	5		lines, which were what Paula Vennells was also saying on
6	provided to subpostmasters, with the implication that	6		Monday, no evidence of systemic issues.
7	this was the root cause of some of the problems related	7		But I'm assuming on 3 July the Executive also
8	to Horizon."	8		wouldn't have seen the final Interim Report.
9	There's reference there to the "Monday Board call"	9	Q.	If we look at the next paragraph, around halfway through
10	and also "on receipt of this". What was your	10		that paragraph, it says:
11	understanding at this point of the likely finding of the	11		"They shared with us today the introductory sections
12	Second Sight Report?	12		of the report, which gave some cause for concern in
13 <b>A</b> .		13		relation to the overall professionalism of the drafting
14	was what we'd been told on 1 July. We hadn't seen any	14		and the widespread use of subjective (and at times
15	draft document, we didn't actually see that until the	15		somewhat emotional) statements of opinion rather than
16	following week. So everything we knew was as reported	16		more neutral or evidence-based insights."
17	to us by Paula Vennells.	17		Second Sight had been appointed as independent
	-	18		investigators. Did you have any view at this stage with
	What was your understanding? We see there for example			regard to the way that their report was being described?
18 <b>Q</b> .		19		
18 <b>Q</b> . 19	reference to "no evidence yet of systemic issues"; were	19 20	Δ	
18 <b>Q</b> . 19 20	reference to "no evidence yet of systemic issues"; were you aware that the Second Sight Report was an interim	20	Α.	No, we could only know what we were being told at that
18 <b>Q</b> . 19 20 21	reference to "no evidence yet of systemic issues"; were you aware that the Second Sight Report was an interim report, for example?	20 21	Α.	No, we could only know what we were being told at that point. They'd been doing this work, there'd obviously
18 <b>Q</b> . 19 20 21 22 <b>A</b> .	reference to "no evidence yet of systemic issues"; were you aware that the Second Sight Report was an interim report, for example? Yeah, I think we did know that from the Monday night	20 21 22	Α.	No, we could only know what we were being told at that point. They'd been doing this work, there'd obviously been interfaces between them and the company and, on the
18 <b>Q</b> . 19 20 21 22 <b>A</b> . 23	reference to "no evidence yet of systemic issues"; were you aware that the Second Sight Report was an interim report, for example? Yeah, I think we did know that from the Monday night call, although, as I say, we hadn't actually seen the	20 21 22 23	Α.	No, we could only know what we were being told at that point. They'd been doing this work, there'd obviously been interfaces between them and the company and, on the Monday night, Paula had updated us, and then here she's
18 <b>Q</b> . 19 20 21 22 <b>A</b> .	reference to "no evidence yet of systemic issues"; were you aware that the Second Sight Report was an interim report, for example? Yeah, I think we did know that from the Monday night	20 21 22	Α.	No, we could only know what we were being told at that point. They'd been doing this work, there'd obviously been interfaces between them and the company and, on the

1		quite irritated.	1		ar
2	Q.	We see in the next paragraph:	2		
3		"We are focusing heavily on our media and	3		
4		stakeholder handling strategy."	4		in
5		Were you aware of a particular strategy in respect	5		ap
6		of the media and stakeholders that was being pursued at	6		
7		that time?	7		
8	Α.	Not particularly in relation to this issue, I would have	8		Aı
9		expected, if there was any report, information, action	9		
10		the company was taking that it was going to have	10		to
11		a public face, somebody in the company would have been	11		
12		thinking about this but I wouldn't have read this in	12		fir
3		this email as particularly unusual.	13		ро
4	Q.	Can we please turn to POL00099121. If we start on the	14		th
5		second page, please, moving now to 6 July. The Board	15		th
16		are emailed again by Paula Vennells, "A quick further	16		no
7		update". She says:	17		do
8		"I have had two further very constructive telephone	18		ap
9		conversations with Alan Bates of the JFSA, which	19		W
20		confirmed his willingness to work collaboratively with	20		th
21		us in taking forward our response to the review."	21		pa
22		Second paragraph:	22		W
23		"It is worth emphasising that Alan Bates' main issue	23		
24		is not 'the computer' but the human aspect: how in his	24		sa
25		view Post Office failed to support and help vulnerable 53	25		th
1		a number of people being sentenced to significant terms	1		no
2 3		of imprisonment, did this paragraph strike you at all?	2 3		in
5 4	Α.	I think the whole email struck me. So on the Monday night, we'd had this Board call, which had been	3 4	Α.	Ye
				А.	
5		difficult, and we were being told about this Interim	5 6		th
5		Report coming. Then we'd had an update on Thursday,	6 7		ok
7		this is now the Saturday morning. There's a whole load of information in here that I think I would have been		~	th
8 9			8 9	Q.	C
9 0		very uncomfortable about. This can I just check, this was the Saturday morning, the 6th, was it	9 10		ar th
1	Q.	It was the 6th.	10		u
2	Q. A.	because I thought I saw at the top the 8th, but that	12		th
3	Λ.	was it's just a forward document, was it?	12		ij
4	Q.	Yes, we'll go to the email of the 8th as well.	13		
14 15	Q. A.	Okay.	14		er at
6	Q.	Perhaps let's turn to the first page and that is the	16	Α.	TI
7	-	8th. I don't need to take anybody to it but we also	10	Q.	Y
8		have a copy of this at POL00297468. But sticking with	17	ч <b>ц</b> .	be
9		this version, we then have an email from Sarah Paddison,	10		ar
20		so presumably on behalf of Paula Vennells, which says:	20		th
21		"As promised in my previous email, here's a copy of	20		do
22		the final draft of the [Second Sight] Report They	21		uu
23		took on board the majority of our comments over the	22		fir
24		weekend, but not all of them. The second attachment is	23 24		ра
		an internal note detailing the remaining aspects of the	25		PC
25					

1		and 'muddle headed' [subpostmasters]."
2		Next paragraph:
3		"He also raised the idea of setting up a new
4		independent third party that [subpostmasters] can
5		approach if they are facing issues with Horizon"
6		If we scroll down, please, it says:
7		"Alwen and I then had a further meeting with James
8		Arbuthnot yesterday afternoon which was also positive."
9 10		If we scroll over the page, please, I'm just going to read to you those final two bullet points. It says:
10		"One of the main reputational and potentially
12		financial risks arising from the review relates to
13		possible attempts to reopen past prosecutions based on
14		the findings. James Arbuthnot was certainly focused on
15		this. We had a stronger exchange on this point. It is
16		not clear that any new evidence has emerged. If it
17		does, then as I pointed out to James, legal routes to
18		appeal already exist. Susan and the Legal Team are
19		working with our external lawyers to consider whether
20		there are any implications arising from the report for
21		past cases, and we can provide a further update on this
22		work next week."
23		Now, having looked at all those documents that we
24		saw this morning, in particular the updated version of
25		the Significant Litigation Report, which identified
		54
1		note which we believe are misleading or factually
2		inaccurate."
3		Is that something you recall receiving?
4	Α.	Yes, there was a whole series of emails, as I said,
5		through the previous week and then into this week and,
6		obviously, the Board was very keen to get its hands on
7		the Interim Report.
8	Q.	Can we please turn to POL00297469, and this is
9		an attached statement. So this is the media statement
10		that was attached in that
11		Sorry, actually, if we go to the previous email
12		that's POL00099121. We see there, below that email that
13		l just took you to with the report, there is another
14		email from Paula Vennells of the same day and she
15		attaches a draft media statement.
16	Α.	This is Monday, the 8th?
17	Q.	Yes, sorry, if we turn back to POL00099121, so we see
18		below that, if we scroll down, we can see that is
19		another email from Paula Vennells saying, "I'm attaching
20		the latest draft of our media statement", and that's the
21		document that I'm just going to be taking you to.
22		Sticking with this email, though, if we look at the
23		final paragraph, it says about halfway down that final
24		paragraph:
25		"The most significant remaining concern relates to 56

there:

1		his continued determination for us to review past
2		prosecutions in light of the findings of the report"
3		That's a reference to James Arbuthnot being
4		concerned about those past prosecutions.
5		Did the issue of past prosecutions feature heavily
6		for you on 8 July?
7	Α.	As I say, I think, on 8 July, the first thing I would
8		have done when I received this email was read the Second
9		Sight Interim Report. So all of the issues I wanted to
10		try I would have wanted to try and understand and, in
11		the email that was sent to us the week before and also
12		in the call on 1 July, my recollection is it felt as if
13		we were being told a series of rather conflicting
14		things: there was this report coming, it was interim, it
15		had factual inaccuracies, the business was trying to
16		correct them, there were no systemic failures but there
17		were some very serious issues in it.
18		So this issue, they were all I think they would
19		all have been in my mind at the time and, obviously, as
20		we might come on to, the 16 July Board meeting attempted
21		to get the Board to draw together its sense of all of
22		these things and the very, very urgent actions it wanted
23		taken.
24	Q.	If we scroll up to the top email, that's your receipt of
25		the final draft of the Second Sight Report, and you have 57
4		"The Deet Office is second the data second with a the

1 "The Post Office is committed to supporting its 2 people and improving the way we do so. The interim 3 review makes clear that the Horizon computer system and 4 its supporting processes function effectively across our 5 network. As the review notes, it is used by around 6 68,000 people in more than 11,500 branches, successfully 7 processing more than six million transactions every day. 8 The review underlines our cause for confidence in the 9 overall system. 10 "It does however raise questions about the training 11 outputs we have offered to some subpostmasters and we 12 are determined to address these issues." 13 Having read the Second Sight Report, do you consider 14 that to have been an accurate reflection of the report? 15 A. I don't know, at the time on that Monday, how much 16 I would have been looking at this press statement. 17 I think I would have been more likely to be reading the 18 Second Sight Interim Report to try to understand what it 19 was saying and I do have a memory of being concerned by 20 what it was saying and, in particular, thinking about 21 this point on training and support, and helplines. So 22 I don't think I would have particularly been thinking 23 does this draft press notice exactly accurately reflect 24 what was in the report on that day, but these --25 But having read the ultimate press reports in the press Q. 59

Inq	uiry 30 July 2024
	said you read that report. Can you recall when you read
	that report?
Α.	I can't recall the time of day, if you mean that. But
	I would have and I also can't tell from this redacted
	document if that email address for me, it looks like it
	was my Energy and Climate Change email address, so it
	would have been coming to me at work. So I might have
	read it really very quickly but I can't recall. The
	other thing that would have been in my mind because, as
	we have briefly discussed, the Shareholder Team was
	getting information and, as we now know, the next day
	the Minister ended up giving a statement in the House,
	so I would have been very keen to understand what was
	going on with Will Gibson, Roger Lowe and that team in
	relation to the Minister.
Q.	So as at 8 July, you would have read the Second Sight
	Report?
	А.

- 18 A. I can't think why I wouldn't have. As I say, it is
- 19 difficult, 12 years ago, or whatever it is, 11 years
- 20 ago, to say the time of day when I would have read it.
- 21 **Q.** I would just like to take you to the attachments to
- those emails. If we could first look at POL00297469.
- 23 This is the media statement that was attached to the
- 24 second email on that page. About halfway down, it says

#### 58

- 1 itself, did you have a view as to whether the Post 2 Office was being accurate in its summary of the Second 3 Sight Report? 4 A. I can't recall particularly thinking about the Post 5 Office's press reports at the time. I think the lines 6 we see here are reasonably consistent with what we had 7 often heard from the Post Office and then, even after 8 the Interim Report, what we continued to hear around, you know, the sort of -- and I'm summarising -- but 9 10 broadly the system working, and then there being 11 questions and issues around training and support. Can we turn to POL00297470. This is another attachment. 12 Q. This is the "Post Office Horizon [Question and 13 14 Answers]". Would you have read this attachment at the 15 time? Sorry, it's not on screen yet. Do you recall 16 this document? 17 A. Well, I've seen now it was attached to an email. 18 I don't particularly recall this and I'm not sure at the time that I would have been most focused on Q&A and 19 20 press releases. I would have been much more likely to 21 be worrying about how the Board had been blindsided and 22 what this report said and what we were going to do about 23 it, and what was the Minister going to say. 24 Q. I'm just going to read to you a few passages from this
- 25 document. The second paragraph says:

. 60

1		"We cannot comment on any individual cases but of
2		course all cases were fully tested in court and no
3		evidence found to suggest the Horizon system is at
4		fault."
5		Another question posed is:
6		"Are you saying you are going to review all these
7		cases?"
8		It says:
9		"The review has raised some concerns regarding or
10		training and support processes. Of course it is only
11		right that a review should be undertaken of any cases
12		where we feel the findings of this interim review might
13		have any bearing."
14		If we scroll down, there's a question:
15		"I've heard there is evidence of faults with the
16		system?"
17		It says:
18		"As the review stresses, the Horizon system has
19		around 68,000 users and processes more than six million
20		transactions every day. While we take every case very
21		seriously, the total number of cases accepted by the
22		external reviewers for this review was 47, less than
23		0.1 per cent of the total number of users of the Horizon
24		system.
25		"With a system of this scale, of course there may be 61
1		police and Crown Prosecution Service?"
2		I know you said you don't recall paying much
3		attention to these particular attachments, rather than
4 5		the report itself but were you, at this time, aware of public lines being taken by the Post Office that were
6		different to what you had read in the report?
7	Α.	I don't think I would have been on that day, Monday,
, 8	А.	8 July, and I don't recall particularly seeing this Q&A
9		document. This looks like a draft but I'm assuming
10		there was a final one that was similar, so
11	Q.	This was the attachment to
12	<u>с</u> .	To that email.
13	Q.	that email, the second email on that page, sent to
14		you by Sarah Paddison on behalf of Paula Vennells.
15	Α.	I think, if I I obviously appreciate why you're
16		asking it the way you're asking but, if you put yourself
17		in the shoes of an individual who has been, as a Board
18		member, waiting for this report, slightly surprised it's
19		coming in a rush, getting conflicting messages, I think
20		the thing that would have been on my mind would have
21		been what is in this report and what are we going to do
22		about it? I just don't think I would have been
23		comparing public lines and Q&A at that point.
24	Q.	Do you recall at that point having any discussions with
25		anybody at ShEx about the report?
		63

1		exceptions whether this is as a result of a power cut or
2		through operator error. We have systems in place to
3		identify and rectify these as quickly as possible (check
4		against findings in report)."
5		Then:
6		"Whenever reconciliation issues arise in the system,
7		we contact branches to inform them that reconciliation
8		is required, either by Post Office or branch."
9		If we scroll over the page, there's a section there:
10		"Why have you destroyed documents relating to
11		criminal investigations?"
12		It says:
13		"In line with industry standards we operate
14		a seven-year document retention policy."
15		If we keep on turning over the page, please, to
16		page 7, penultimate page, "Why are you able to run your
17		own prosecutions? This can't be fair?"
18		t says:
19		"As with HMRC and other bodies which safeguard
20		public money (need to check the accuracy of this), the
21		Post Office has investigation and prosecuting
22		authorities in its own right."
23		Then there's a question:
24		"Will you reconsider investigating and prosecuting
25		cases yourself instead of handing these functions to the
		62
1	A.	
	ς.	I can't, in my memory, recall the to and fro with ShEx
2		I can't, in my memory, recall the to and fro with ShEx but I know that I would have because this was such
2 3		
	<b>~</b> .	but I know that I would have because this was such
3		but I know that I would have because this was such a significant issue. On my time, on the Board, I think
3 4	~	but I know that I would have because this was such a significant issue. On my time, on the Board, I think I'm right that the Minister only gave two oral
3 4 5	~	but I know that I would have because this was such a significant issue. On my time, on the Board, I think I'm right that the Minister only gave two oral statements, and one ended up being on Tuesday, 9 July
3 4 5 6	~	but I know that I would have because this was such a significant issue. On my time, on the Board, I think I'm right that the Minister only gave two oral statements, and one ended up being on Tuesday, 9 July 2013. So that would have been a significant thing for
3 4 5 6 7	~	but I know that I would have because this was such a significant issue. On my time, on the Board, I think I'm right that the Minister only gave two oral statements, and one ended up being on Tuesday, 9 July 2013. So that would have been a significant thing for them and, as I've now been able to see, there was a lot
3 4 5 6 7 8	~	but I know that I would have because this was such a significant issue. On my time, on the Board, I think I'm right that the Minister only gave two oral statements, and one ended up being on Tuesday, 9 July 2013. So that would have been a significant thing for them and, as I've now been able to see, there was a lot of to and fro between them and the Post Office getting
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<ol> <li>3</li> <li>4</li> <li>5</li> <li>6</li> <li>7</li> <li>8</li> <li>9</li> <li>10</li> <li>11</li> <li>12</li> <li>13</li> <li>14</li> <li>15</li> <li>16</li> <li>17</li> <li>18</li> <li>19</li> <li>20</li> </ol>	Q.	but I know that I would have because this was such a significant issue. On my time, on the Board, I think I'm right that the Minister only gave two oral statements, and one ended up being on Tuesday, 9 July 2013. So that would have been a significant thing for them and, as I've now been able to see, there was a lot of to and fro between them and the Post Office getting ready to brief Jo Swinson, and she also has been to this Inquiry. Do you think that there was insufficient sharing of information from the ShEx team to yourself on issues relating to the Second Sight Report? I mean, I haven't thought about it I didn't think about it like that at the time. Now I've seen all of the to and fro, I think one of my observations would be that what was so unusual about this issue was that the Chairman and Chief Executive were having the interface with Sir Alan Bates and the JFSA and James Arbuthnot. MPs were raising things with ministers through
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3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	Q.	but I know that I would have because this was such a significant issue. On my time, on the Board, I think I'm right that the Minister only gave two oral statements, and one ended up being on Tuesday, 9 July 2013. So that would have been a significant thing for them and, as I've now been able to see, there was a lot of to and fro between them and the Post Office getting ready to brief Jo Swinson, and she also has been to this Inquiry. Do you think that there was insufficient sharing of information from the ShEx team to yourself on issues relating to the Second Sight Report? I mean, I haven't thought about it I didn't think about it like that at the time. Now I've seen all of the to and fro, I think one of my observations would be that what was so unusual about this issue was that the Chairman and Chief Executive were having the interface with Sir Alan Bates and the JFSA and James Arbuthnot. MPs were raising things with ministers through Parliamentary Questions, correspondence. There was a to and fro between the Post Office and the shareholder and
3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	Q.	but I know that I would have because this was such a significant issue. On my time, on the Board, I think I'm right that the Minister only gave two oral statements, and one ended up being on Tuesday, 9 July 2013. So that would have been a significant thing for them and, as I've now been able to see, there was a lot of to and fro between them and the Post Office getting ready to brief Jo Swinson, and she also has been to this Inquiry. Do you think that there was insufficient sharing of information from the ShEx team to yourself on issues relating to the Second Sight Report? I mean, I haven't thought about it I didn't think about it like that at the time. Now I've seen all of the to and fro, I think one of my observations would be that what was so unusual about this issue was that the Chairman and Chief Executive were having the interface with Sir Alan Bates and the JFSA and James Arbuthnot. MPs were raising things with ministers through Parliamentary Questions, correspondence. There was a to and fro between the Post Office and the shareholder and I think in this week, it seems to me now, with

(16) Pages 61 - 64

1	Q.	As the Government representative on the Board, was there	1		that Susan Cr
2		a problem there in the communication from those who were	2		why Susan Ci
3		working on behalf of the Government?	3	Α.	No, no. A lot
4	Α.	I didn't I wouldn't put if it like that but, and	4		brought out in
5		I don't think there was a problem. I've described the	5		day.
6		way in which we worked during this period. I think we	6	Q.	Did you atten
7		would have been very regularly discussing. I think, of	7		a restaurant?
8		course, now when you look back, everybody would have	8	Α.	There was a l
9		wished, and I certainly wished I had a whole load more	9		I wrote my sta
10		information at a number of points, and this one	10		definitely was
11		included.	11		morning, and
12	Q.	Was it lines of communication, was it individual	12		Chairman and
13		personalities: what was it that interrupted the flow of	13		there; Neil Mo
14		information relating to the Second Sight Report?	14		But yeah
15	Α.	I don't think I did say that the flow was interrupted.	15		of just the nor
16		It was more that there was a set of events playing out	16		of discontent
17		very fast in realtime and so I imagine the Shareholder	17		events had ur
18		Team's priority, rightly, was to brief the Minister. My	18	Q.	Was that dire
19		priority was to get the information as a Board member,	19	Α.	My own view
20		and we would have been communicating between us.	20		interface betw
21	Q.	Let's turn to the Board meeting. Can we please look at	21		Sight Interim
22		POL00021516. That's the 16 July 2013 Board meeting.	22		responsible for
23		It's a meeting that the Inquiry has looked at on	23	Q.	That was you
24		a number of occasions.	24		just as expres
25		We note there, in terms of those who are present, 65	25	Α.	Again, it's I
1		the conversation but I think there was a kind of my	1		weaker on dif
2		recollection is there was a sort of groundswell of	2		that this partic
3		discontent.	3		the Executive
4	Q.	Aimed simply at the Executive Team or at others?	4		communicatio
5	Α.	When you're a Non-Executive Director, your role really	5		emails, it just
6		is to provide oversight, but the Executive Team and, in	6		a Non-Execut
7		particular, the Executive Directors, are the engine room	7		comfort from
8		of the business. They are the people who are	8		thoughtful, no
9		responsible for running that business, for undertaking	9		No surpri
10		with appropriate care and diligence all of their tasks,	10		of that and us
11		and I think we felt frustrated that, after over a year	11		arm's-length l
12		of work, there was suddenly this very rushed week, the	12		for, you do no
13		report had been published and, you know, I would have	13		that time I felt
14		felt that the Minister had been put in a difficult	14		I think that co
15		position, having to make a statement to Parliament.	15		board that da
16	Q.	Were there any individuals specifically named during	16		to be blindsid
17		those discussions that stand out?	17		train.
18	Α.	I don't recall that. I think this was part of where	18	Q.	We mentione
10			10		Thetwee even
19		some of my concerns about the Chief Executive were	19		That was exp
		some of my concerns about the Chief Executive were starting to crystallise.	19 20		I am to summ
19	Q.	-			
19 20	Q. A.	starting to crystallise.	20		I am to summ
19 20 21		starting to crystallise. What were those concerns?	20 21		I am to summ it was along th
19 20 21 22		starting to crystallise. What were those concerns? It's really hard to talk about somebody's performance in	20 21 22	А.	l am to summ it was along th her head to ir
19 20 21 22 23		starting to crystallise. What were those concerns? It's really hard to talk about somebody's performance in this context now, with everybody reflecting with such	20 21 22 23	А.	I am to summ it was along t her head to ir Susan Crichte

Crichton was not present. Did you understand Crichton wasn't present?

- ot of the issues around that that have been in this Inquiry, I was not aware of on that
- nd a pre-meeting to the Board meeting in ?
- breakfast that morning. In fact, when
- tatement I couldn't identify if it
- as that morning, but I think now it was that
- d that, my recollection is, was with the
- nd those Non-Executive Directors who were
- IcCausland had given apologies that day.
- h, I do have a recollection of a conversation
- on-executives and the Chairman with a lot
- t being expressed about the way this set of
- unfolded.
- rected at a particular individual?
- v was the Executive had mishandled the
- tween the Board and the whole of this Second
- n Report, and I held Paula Vennells
- for that, as the Chief Executive.
- ur own view. What were the views of others, essed at that breakfast meeting?
- I can't recall the ins and outs of all of 66
- lifferent things. I think I felt, though, ticular issue hadn't been well handled by e Team and, despite the rush of ions, some late-night emails, some weekend st didn't feel orderly and, as utive Director, the things that you take n are that the organisation is orderly, no surprises. prises is a really big thing. I still think se it a lot today. You know, I have 42 bodies in the Department I'm responsible ot want to be surprised. And I think, at It that it hadn't been well handled and comes out in the minutes for the subsequent ay, where we went on to say we didn't want ded and a whole load of actions were put in ed just before the absence of Susan Crichton. plained by Alice Perkins in her evidence, if marise, that events overtook her, and I think the lines of the thought didn't come into invite her back in. Were you even aware of ton sitting outside that meeting? anything to do with her sitting outside.
- ecause some of the papers we looked at that viously 68

1		day there was a paper from Susan written on 12 July,		1	
2		it was from her yeah, I suppose I might have thought		2	
3		why was this being presented by Paula Vennells, but		3	
4		I don't remember now a big focus on that. And I suppose		4	
5		I also would have thought that, if the General Counsel		5	
6		wanted or thought she should be in the room, she would		6	
7		have been in the room. It wouldn't really have occurred		7	
8		to me that somebody would stay outside a room.		8	A
9	Q.	Was the atmosphere in the room such that matters were		9	
10		happening very quickly, it was a particularly rushed or		10	
11		particularly packed Board meeting or not?		11	
12	Α.	I don't recall that. I mean, as you know, the Board		12	
13		agendas for this company through these years, when I was		13	
14		a Non-Executive Director, were hugely full because there		14	
15		was so much business to be done on very difficult and		15	
16		important issues. I don't particularly recall this one		16	
17		being more or less packed than any other.		17	
18	Q.	Thank you. If we go through a few passages from the	·	18	
19		minutes, we see at the bottom of this page:		19	
20		"The Board discussed the papers received from the	;	20	Ç
21		Executive Committee members and agreed that in future	;	21	
22		the content of the papers would not be presented at the	;	22	
23		Board meeting so as to free up time for discussion. The		23	
24		papers needed to be clear, not overly optimistic, and		24	
25		commercially focused so questions of fact would not be		25	
		69			
1		Board asked if Susan Crichton, as General Counsel, was		1	
2		in any way implicated in the prosecutions."		2	
3		At (c):		3	
4		"The Board expressed strong views that the Business		4	
5		had not managed the Second Sight review well and		5	
6		stressed the need for better management and cost control		6	
7		going forward."		7	
8		There's a reference there to "the business". Can		8	
9		you recall specific names being mentioned?		9	
10	Α.	, , , , , , , , , , , , , , , , , , ,		10	
11		the day-to-day interface would have been between Paula		11	
12		Vennells and, as we've discussed, she gave a number of		12	
13	_	the updates, and also Susan Crichton.		13	
14	Q.			14	
15		therefore things could happen that were beyond the		15	
16		control of the business.		16	
17		"However, the things that could be managed by the		17	C
18		Business needed to be well managed with strong		18	
19		leadership and the Board asked the CEO if she had		19	
20		considered changing the person leading for the		20	
21		Business."		21	
22		What did that mean?		22	
23	Α.			23	
24		hard to disaggregate now specifically which meeting		24	
25		different considerations came up and were then discussed		25	A
		71			

1		necessary. They should also arrive in good time. The
2		Chairman asked the Board to contact the ExCo member
3		responsible for a paper before the meeting if they were
4		unclear or didn't have the necessary detail. The Board
5		also asked for earlier warning when risks and issues
6		arise to ensure they were not blindsided."
7		Can you assist us with that passage, please?
8	Α.	Well, I think we had been blindsided the week before,
9		and we were irritated, and my reflection is, in any
10		situation in any company, or if something starts to go
11		wrong, those are the times that you want to get into
12		more detail. I think we felt that we'd been bounced by
13		the Second Sight Interim Report and so I think that's
14		why we were saying, "Please give us early warning of
15		risks, please tell us about risks, please do not
16		blindside us".
17		The minutes, as you know, are quite mild in their
18		phrasing, quite anodyne. A word like "blindsided"
19	~	I think was probably a direct quote.
20	Q.	If we could turn to page 6, there's a section on the
21 22		"Horizon Update". I won't spend much time on it because this is something we've seen a lot of but at (b) it
23		says:
23		"The Board were concerned that the review opened the
25		business up to claims of wrongful prosecution. The
		70
1		and acted on, but there had been a sense, increasingly
1 2		and acted on, but there had been a sense, increasingly, I think, that the Second Sight Interim Report and Second
2		I think, that the Second Sight Interim Report and Second
2 3		I think, that the Second Sight Interim Report and Second Sight, they were independent, the Board itself hadn't
2 3 4		I think, that the Second Sight Interim Report and Second Sight, they were independent, the Board itself hadn't had particular control of the terms of reference. If
2 3 4 5		I think, that the Second Sight Interim Report and Second Sight, they were independent, the Board itself hadn't had particular control of the terms of reference. If you remember back to the May meeting, we were just told
2 3 4 5 6		I think, that the Second Sight Interim Report and Second Sight, they were independent, the Board itself hadn't had particular control of the terms of reference. If you remember back to the May meeting, we were just told in AOB that this was happening and we thought it was
2 3 4 5 6 7		I think, that the Second Sight Interim Report and Second Sight, they were independent, the Board itself hadn't had particular control of the terms of reference. If you remember back to the May meeting, we were just told in AOB that this was happening and we thought it was a good thing to do.
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2 3 4 5 6 7 8 9		I think, that the Second Sight Interim Report and Second Sight, they were independent, the Board itself hadn't had particular control of the terms of reference. If you remember back to the May meeting, we were just told in AOB that this was happening and we thought it was a good thing to do. But I'm assuming there was a sense at the time that we wanted because now we'd seen the report, there
2 3 4 5 6 7 8 9		I think, that the Second Sight Interim Report and Second Sight, they were independent, the Board itself hadn't had particular control of the terms of reference. If you remember back to the May meeting, we were just told in AOB that this was happening and we thought it was a good thing to do. But I'm assuming there was a sense at the time that we wanted because now we'd seen the report, there were a load of actions being discussed to be taken
2 3 4 5 6 7 8 9 10 11		I think, that the Second Sight Interim Report and Second Sight, they were independent, the Board itself hadn't had particular control of the terms of reference. If you remember back to the May meeting, we were just told in AOB that this was happening and we thought it was a good thing to do. But I'm assuming there was a sense at the time that we wanted because now we'd seen the report, there were a load of actions being discussed to be taken forward, we wanted a kind of programme of work with
2 3 4 5 6 7 8 9 10 11 12		I think, that the Second Sight Interim Report and Second Sight, they were independent, the Board itself hadn't had particular control of the terms of reference. If you remember back to the May meeting, we were just told in AOB that this was happening and we thought it was a good thing to do. But I'm assuming there was a sense at the time that we wanted because now we'd seen the report, there were a load of actions being discussed to be taken forward, we wanted a kind of programme of work with clear leadership and if you're a Board, a Non-Executive
2 3 4 5 6 7 8 9 10 11 12 13		I think, that the Second Sight Interim Report and Second Sight, they were independent, the Board itself hadn't had particular control of the terms of reference. If you remember back to the May meeting, we were just told in AOB that this was happening and we thought it was a good thing to do. But I'm assuming there was a sense at the time that we wanted because now we'd seen the report, there were a load of actions being discussed to be taken forward, we wanted a kind of programme of work with clear leadership and if you're a Board, a Non-Executive Director, what you want is to be confident that they'll
2 3 4 5 6 7 8 9 10 11 12 13 14		I think, that the Second Sight Interim Report and Second Sight, they were independent, the Board itself hadn't had particular control of the terms of reference. If you remember back to the May meeting, we were just told in AOB that this was happening and we thought it was a good thing to do. But I'm assuming there was a sense at the time that we wanted because now we'd seen the report, there were a load of actions being discussed to be taken forward, we wanted a kind of programme of work with clear leadership and if you're a Board, a Non-Executive Director, what you want is to be confident that they'll be people leading that who have got the capacity and
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1		it was. It may have been Alasdair Marnoch in his	
2		position as Audit Committee Chair because, often in	
3		businesses, if a risk profile changes, regardless of	;
4		whether or not it manifests, you need to notify the	2
5		insurers. So it may have been that. The other thing is	Ę
6		that the as part of the separation of the two	(
7		businesses, the Royal Mail Group, I think, had been the	-
8		named party on some of the insurance contracts, so	8
9		and we were trying to finish the transitional services,	(
10		such that the Post Office stood on its own, so it could	1
11		have related to that. But I don't I can't I've	1
12		sort of wondered about this and I can't really recall	1
13		much more.	1
14	Q.	I'll take you to some of the insurance related emails	1
15		shortly. If that could come down, please. At	1
16		paragraph 127 of your witness statement you say that	1
17		this was the first time you became aware that the Post	1
18		Office was able to act and was acting as a prosecuting	1
19		authority, and you've described your feeling as being	1
20		uncomfortable by that. Now, what did you mean by	2
21		uncomfortable?	2
22	Α.	I think, as I said earlier, I'd obviously seen the SLRs	2
23		which had talked about legal situations. It just	2
24		I don't recall it having occurred to me, before I read	2
25		the papers for this 16 July Board meeting, that	2
		73	
1		signs at the time did not point us to that place given	
2		the assurances we were being given."	
3		Looking at this moment in time, where you find out	:
4		that the Post Office itself prosecutes people, do you	4
5		think that you were sufficiently robust in scrutinising?	ł
6	Α.	Would you mind if I just make a general comment about us	(
7		as a Board before I come on to that point?	-
8	Q.	Absolutely.	8
9	Α.	When I went onto the Board in April 2012, I was	9
10		pleasantly surprised by the calibre, to my mind, of	1
11		those Non-Executive Directors. They were extremely	1
12		robust, to the point that sometimes I used to feel in	1
13		meetings that it must have been quite difficult for the	1
14		executive members or people presenting. People did not	1
15		hold back in saying what they thought, what they were	1
16		worried about and in challenging. So, as a general	1
17		sense, I did think we were robust in our scrutiny and	1
18		not for this Inquiry but, as you know, there was	1
19		an array of things that we were trying to do with that	1
20		business, most of which were not easy.	2
21		I think the point here is and I wanted to reflect	2
22		at length in my statement, because the situation has	2
23		just been so catastrophic, you can't help feeling, as	2
24		a person I was responsible between April 2012 and March	2
25		2014 as the Shareholder Non-Executive Director, you	2

on IT	' Inq	uiry 30 July 2024
1		specifically, what the Post Office itself was doing, and
2		that made me feel uncomfortable. I was surprised by it.
3	Q.	Did it suggest something quite fundamentally wrong with
4		the levels of information that was going to the Board?
5	Α.	I don't think I was necessarily thinking that because,
6		as a non-executive Board member, consistent with
7		governance codes and best practice, you do not expect to
8		see the vast majority of information. What you expect
9		is that the responsibilities are clearly defined, the
10		delegations are working, you've got first and second
11		line assurance to sort of double-check. So I don't
12		think I would have been thinking particularly that
13		point.
14		I just had a discomfort because a year into the
15		business and, having seen the Second Sight Interim
16		Report, it made me feel uncomfortable.
17	Q.	Can we turn back to your witness statement, please,
18		page 100. It's page 100, paragraph 218. If we scroll
19		down, you say in paragraph 218:
20		"I do continue to think we were robust in our
21		scrutiny and challenged the [Executive Team] when we had
22		the information to enable us to do so. And while there
23		were numerous proactive steps that I have detailed in
24		this document my view now is that it is impossible not
25		to feel now that more should have been done, even if the
		74
1		can't help feeling that we should have done more. So
2		yes, now I think, on each of these areas, could we,
3		should we, what would have happened if we had done more?
4		l mean, I set out in paragraph 140 of my witness
5		statement all of the actions we did take, and I think at
6		the time, we thought we were being active and prudent.
7		That's how it felt. It was a very busy time after the
8		Interim Report, a whole load of things happened. It's
9		a reflection, though, that, of course, you wonder if you
10		could have/should have done more.
11	Q.	Given the terms that were used at that Board meeting,
12		"blindsided", et cetera, do you think you took
13		sufficient steps at Board level to scrutinise the whole
14	_	way that the company was being run at that stage?
15	Α.	Yes, I mean, I think generally we had been and were at
16		that stage, and continued to be for the period that
17		I was on the Board, diligent in trying to ensure that
18		the company was running with an appropriate control
19 20		environment and in an appropriate way.
20		In relation to this issue, after and at that 16th
21		Board meeting and in the following 16 July Board
22		meeting and in the following weeks and months, there
23		were a range of things that happened and, yeah, at the

- 24 time that did feel very active. As I have also put in
- 25 my reflections, you know, whilst we had actions in terms 76

1	of the Mediation Scheme, the various pieces of work and	1		
2	the follow-on with Second Sight, and later set up the	2		 "[Second] The impact of the Financial Services
2	Board committee, specifically on this, I do reflect now	3		Junction insurance changes
4	that we should have done more at that point and onwards	4		"[Third] The impact on Horizon/Second Sight on our
5	on past prosecutions.	5		insurance cover."
6	<b>MR BLAKE:</b> Thank you, sir. That might be an appropriate	6		Then there is a section/paragraph at the bottom. It
7	moment to take our second morning break.	7		says, "Insurance":
8	SIR WYN WILLIAMS: Yes.	8		"We discussed what impact the current Horizon issues
9	<b>MR BLAKE:</b> If we could come back just after 12.15.	9		might have on our insurance on which we are advised by
10	(12.06 pm)	10		our insurance broker Miller. Their view is that whilst
11	(A short break)	10		other insurance policies may be impacted the most likely
12	(12.18 pm)	12		one is [Directors and Officers] this has the added
13	MR BLAKE: Thank you.	12		complication as it is the only policy we share with
14	Ms Storey, I said that we would address the issue of	13		[Royal Mail] and was placed by their broker, JLT. The
15	insurance and insurance notification, and that's the	15		excess on this policy varies under different criteria
16	issue that I'd like to address now. Could we please	16		but the main one is $\pounds 25,000$ on each and every claim.
17	start by looking at POL00099330. So we've had the Board	10		A meeting is being set up with JLT and Miller to ensure
18	meeting of 16 July and there was that slightly ambiguous	18		they are fully briefed on the issues before JLT engage
19	wording in the minutes that we looked at, relating to	10		with the insurers".
20	the insurance position. This is an email from Alwen	20		Moving on to POL00099331.
20	Lyons to the Board, including you, we can see there	20		Do you recall receiving that email?
22	thank you very much and Alwen Lyons says:	21	Α.	The email that you've just been reading from?
23	"On Tuesday the Board asked for information on three	22	Q.	
24	things this week:	20	а.	
25	"[First] A paper on Transitional Support Services	25	7.4	for things obviously very quickly. So that was coming
	77			78
1	three days after the Board meeting.	1		of any claim is not covered (this is being verified).
2	<b>Q.</b> Thank you. If we please turn to page 3 bottom of	2		"Secondly, our broker (Miller) will meet with [Royal
3	page 2, and the top of page 3 we see, if we scroll	3		Mail's] (JLT) to determine the best way to engage with
4	down slightly, Alasdair Marnoch responding to Chris Day,	4		D+O insurer/s which will enable us to understand the
5	whose name is at the bottom of that previous email.	5		possible impact on this (and possibly other) policy
6	Slightly further down, sorry. Thank you very much.	6		premia going forward.
7	He says:	7		"The subtlety theory is that we need to inform
8	"On the insurance [question] we were keen to know if	8		existing insurers of a potential new risk (in hand)
9	we have currently got insurance cover for any claim	9		without 'scaring the horses' into immediately increasing
10	arising? Don't think your answer deals with this	10		future costs, and this process is made more complex by
11	point I'm sure Susan will know though."	11		being a joint policy with [Royal Mail] (the only one
12	You're not on this email chain. I'm just going to	12		that is configured in this way).
13	go through it just to provide some background and some	13		"Will provide a fuller update when we have
14	context. If we scroll up, it seems as though this is	14		established all the facts, next week.
15	an email from Mr Marnoch to Paula Vennells, and he says:	15		"Charles please confirm my understanding is
16	"No need to broadcast loudly but I don't think C	16		correct."
17	[I think that's Chris Day] has understood the question	17		If we scroll up there is an email from Paula
18	on insurance (or I've misunderstood the answer). Either	18		Vennells, forwarding that response to Alasdair Marnoch.
19	way a quick clarification will hopefully avoid more	19		She says:
20	mails."	20		"Hi Alasdair, did you get the clarification you
21	If we scroll up, Mr Day responds internally and he	21		asked for?
22	says:	22		"I also left a message with Chris as his note on
23	"Sorry if not clear; there are two points firstly	23		insurance cover raised two questions for me. Firstly,
24	the D+O appears to be the policy which would cover this	24		that there could be an impact re future costs across
25	eventuality, and our understanding is the first 25,000 79	25		several policies. I understand D&O but which others 80

(20) Pages 77 - 80

1		may be obvious to the experts but it isn't to me. And
2		secondly, his note seemed to imply we were going to
3		check if we are covered does that mean we may not
4		be/we don't know?
5		"Chris' reply to my question is below. The line
6		which bothers me slightly is 'D&O appears to be the
7		policy which would cover'
8		"Am I being too hawkish? I would have preferred to
9		read 'D&O is the policy which (if needed) will cover
10		
11		"Does Chris' reply to you give more comfort?
12		I don't want to pile the pressure on Chris by going
13 14		again unnecessarily."
14		If we scroll up to the top, we have the response from Mr Marnoch. He says that he's afraid Chris' answer
16		does not address the key question as to whether or not
17		the Post Office have got cover:
18		"He dropped me a note which suggested we do but
19		seems to suggest it would be under D&O cover. Like you
20		I'm concerned that we believe this policy would cover us
21		for this sort of issue rather I'm sure we will have a
22		PI policy which will cover us for this and any other
23		like issue.
24		"The follow-on issue is that to avoid the
25		underwriters rejecting our claim, we need to keep them
		81
1		from the Horizon report. That can be found at
2		POL00298004. There were two versions of this report
3		that were sent to Board members; do you recall, in broad
4		terms, this document?
5	Α.	I do recall it in broad terms.
6	Q.	The document says:
7		"Further to the Board discussion on 16 July, this
8		note provides an update on how we're taking forward the
9		programme of work"
10		So this is essentially how we are taking forward the
11		matters raised at that Board meeting.
12		We see, if we scroll down, there's a section on
13		completing the Second Sight reviews.
14		Over the page and on to page 3, the bottom of
15		page 3, where we see there's "Prosecution Case Review",
16		and it outlines that:
17 18		"Through our criminal law solicitors, Cartwright
18 19		King, we are complying with this duty by reviewing past and present prosecutions to identify any cases where
19 20		Second Sight Report ought to be disclosed."
20 21		Second Signi Report ought to be disclosed. Scrolling over the page to paragraph 17, there's
21		reference there to Brian Altman's review.
23		Can we go to paragraph 30, on page 7, please.
23		Paragraph 30 says:
25		"The Board requested further information on the
		83

on IT In	quiry 30 July 2024
1	abreast of developments and any possible claims (on this
2	and any other issues). Experience tells me that keeping
3	underwriters updated on this sort of developing issue
4	can be very tricky getting the balance right in levels
5	of disclosure. Normally I would have expected Chris to
6	have been involved in discussions with Susan testing the
7	thinking at each stage of the process.
8	"I've gone back to Chris for further clarification
9	but I suggest it's handled in a face-to-face
10	conversation
11	"The issues about any disclosure is that it will
12	affect our premiums even if the underwriters don't pay
13	out. It's a bit like having to report near misses when
14	you're driving as well as crashes. The result will be
15	higher premiums, etc, etc. But turn the issue,
16	hassle/cost) on its head and we can reverse this problem
17	into a cost saving/process improvement opportunity by
18	combining necessary reporting to underwriters with
19	improvements on our own processes identifying mistakes
20	and a tracking mechanisms to their resolution."
21	I'm afraid I'm going through the chain of events so
22	I am going to have to read a fair amount from this
23	chain.
24	Almost a week goes by after that and then the Board
25	is provided with an update on the work programme arising 82
1	incurance position: a congrete pete is attached on this
2	insurance position: a separate note is attached on this. Annexe A also provides further information Directors'
2	duties as they relate to this review."
4	I'm going to just now take you to the covering email
5	to that. That can be found at POL00145882. If we start
6	on the bottom of page 3, we see Alwen Lyons emails and
7	we'll scroll up in a bit to see the group, but you are
8	one of the recipients.
9	"Dear All
10	"Please find attached a detailed note from Paula
11	providing an update on our programme of work in response
12	to the Horizon investigation."
13	If we scroll up, we can see copied to you a response
14	from Alasdair Marnoch, at the bottom of that email. He
15	says:
16	"Finally I seem to be missing the insurance
17	update could you please resend."
18	That's a reference to the insurance update that's
19	promised at page 30 of that document that I have just
20	taken you to.
21	If we keep on scrolling up, please, Martin Edwards
22	then responds and says:
00	"An element of the should have been this yearing of

- "Apologies all, it should have been this version of the note attached to yesterday's email, which
- incorporates the insurance information (at paragraph 31)

## The Post Office Horizon

1		rather than leave that in a standalone note."
2		I'm going to take you to that updated version very
3		shortly but, before I do that, if we could just have
4		a look at the email from Alice Perkins. She emails,
5		again, the Board, including yourself. She says:
6		"I had some thoughts which I want to put on record
7		about the way ahead.
8		"First, while it is clear that we are committed to
9		using [Second Sight] for the 47 cases which are already
10		in the frame for their review, it is extremely important
11		that we cap their involvement at that."
12		This is a separate issue but I'd just like to pause
13		there and ask you about that. Do you recall a movement
14		towards capping Second Sight's involvement at that
15		stage?
16	Α.	I mean, I can obviously read the words on this page.
17		I don't recall thinking of it in that way at that time.
18		I thought that, after the 16 July Board meeting, there
19		were a whole load of actions and that included work for
20		Second Sight.
21	Q.	Because it follows in the next sentence:
22		"The moment they are involved in additional cases
23		beyond these, we will have lost the ability to end the
24		relationship with them"
25		Were you aware of a desire to end the relationship
		85
1		"Second, we need to pin down and cap [Second
1 2		"Second, we need to pin down and cap [Second Sight's] costs
2		Sight's] costs
2 3		Sight's] costs "Third, we need a proper process of appointing the
2 3 4		Sight's] costs "Third, we need a proper process of appointing the independent Chair of the Working Party."
2 3 4 5		Sight's] costs "Third, we need a proper process of appointing the independent Chair of the Working Party." Then, "Finally", she says:
2 3 4 5 6		Sight's] costs "Third, we need a proper process of appointing the independent Chair of the Working Party." Then, "Finally", she says: " I have asked Susan to keep the Board fully
2 3 4 5 6 7		Sight's] costs "Third, we need a proper process of appointing the independent Chair of the Working Party." Then, "Finally", she says: " I have asked Susan to keep the Board fully informed of future developments and to alert me of
2 3 4 5 6 7 8		Sight's] costs "Third, we need a proper process of appointing the independent Chair of the Working Party." Then, "Finally", she says: " I have asked Susan to keep the Board fully informed of future developments and to alert me of anything which she is unable to resolve which could get
2 3 4 5 6 7 8 9		Sight's] costs "Third, we need a proper process of appointing the independent Chair of the Working Party." Then, "Finally", she says: " I have asked Susan to keep the Board fully informed of future developments and to alert me of anything which she is unable to resolve which could get in the way of getting the job done in the way it needs
2 3 4 5 6 7 8 9		Sight's] costs "Third, we need a proper process of appointing the independent Chair of the Working Party." Then, "Finally", she says: " I have asked Susan to keep the Board fully informed of future developments and to alert me of anything which she is unable to resolve which could get in the way of getting the job done in the way it needs to be done. She will be seeking conversations about all
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2 3 4 5 6 7 8 9 10 11 12		Sight's] costs "Third, we need a proper process of appointing the independent Chair of the Working Party." Then, "Finally", she says: " I have asked Susan to keep the Board fully informed of future developments and to alert me of anything which she is unable to resolve which could get in the way of getting the job done in the way it needs to be done. She will be seeking conversations about all of this with all the [Non-Executive Directors] on an individual basis and will be in touch with you to
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on I1	「 Inq	uiry 30 July 202
1		with Second Sight at that stage?
2	Α.	I mean, this and all the other things you have just
3		shown me are a series of emails that were coming in
4		after the Board meeting. I would have read these words,
5		noted that they're from the Chair. I don't particularly
6		remember that issue to a greater extent than any of the
7		others at this point.
8	Q.	It being, I think, on your own evidence, quite
9		a significant Board meeting of all the Board meetings
10		that we've seen, would you have paid quite a lot of care
11		and attention to the emails you were receiving at that
12		stage?
13	Α.	You mean 16 July?
14	Q.	Yes.
15	Α.	Yeah, absolutely. I mean, I think that, even in the
16		ones you were just showing, I'm sure we'll come back to
17		the insurance question, but you can see emails coming
18		out on 19 July which is after we would even have
19		received the minutes, then emails to and fro, some of
20		which I was not copied on through the weekend. But
21		yeah, there was a whole series of actions and I would
22		have been very focused on it because, going back to our
23		conversation earlier, I was irritated about the
24		handling.
25	Q.	Reading on, she says:
		86
1		turn, please, to paragraph 30 and 31, this is the
2		insurance section. It's page 8. Thank you very much.
3		So we see there a changed form of words. It's
4		an expanded form of words at paragraph 31, addressing
5		the insurance position, and it says:
6		"The Board requested further clarification on their
7		exposure as directors in relation to the review. As set
8		out in more detail at Annexe A, it is highly unlikely
0		that any individual director would have any personal

7 t 8 9 that any individual director would have any personal 10 liability in connection with this review ..." 11 Then it refers to insurance being in place to cover 12 their liabilities, and it gives the amount, and then at paragraph 32: 13 14 "In response to the Board's request for a post 15 mortem, internal audit has now been tasked with carrying 16 out a review", et cetera. 17 So there's just a slight addition on paragraph 31 to 18 what was previously in paragraph 30. 19 If we scroll down, we can see Annexe A, it sets out 20 there the Directors' duties, the focus being very much 21 on individual liability of directors. 22 Could we please now turn to POL00193010, which is 23

another exchange from Alasdair Marnoch at the bottom of 24 the first page. Thank you. If we scroll down slightly, 25 he says:

1		"I'm afraid the para on insurance does not answer
2		the question which was about PI cover for the [Post
3		Office] not D&O cover for the Directors.
4		"The key question is does the [Post Office] have
5		insurance cover in the event of a material claim (or
6		perhaps a 'class action' type claim)? Probably easiest
7		if I pick it up directly with Chris."
8		Irrespective of this particular email chain and
9		whether you focused on this particular issue at this
10		time or not, looking at it, is that a big issue for the
11		Post Office, whether it has insurance cover in the event
12		of, for example, a class action claim?
13	Α.	My recollection of the 16 July Board meeting was we
14		wanted to make sure we were prudent in taking all the
15		steps we thought needed to be taken, in light of our
16		understanding at that time of what the Second Sight
17		Interim Report was saying. So there was a whole raft of
18		things. I took some personal comfort from the fact
19		Alasdair Marnoch, as Chair of ARC, and who I found to be
20		a very diligent individual, was going to take the lead
21		on behalf of the Non-Executive Directors, I think in his
22		capacity as Audit and Risk Committee Chair, for kind of
23		leading some of these areas of work.
24		This issue and all the to and fro you've just shown
25		me on insurance, some of which I wasn't copied on, 89
1		problems with helplines, or the way kind of interface
2		with the system worked, that was a big issue and, of
3		course, getting a more clear view of what the actual
4		
5	~	situation was.
~	Q.	If we scroll up we can see a response from Chris Day
6	Q.	If we scroll up we can see a response from Chris Day internally to Charles Colquhoun. He says:
7	Q.	If we scroll up we can see a response from Chris Day internally to Charles Colquhoun. He says: "Charles, please see if there's a straightforward
7 8	Q.	If we scroll up we can see a response from Chris Day internally to Charles Colquhoun. He says: "Charles, please see if there's a straightforward paragraph we can write on this (should go in my name)
7 8 9	Q.	If we scroll up we can see a response from Chris Day internally to Charles Colquhoun. He says: "Charles, please see if there's a straightforward paragraph we can write on this (should go in my name) rather than giving them the whole insurance paper."
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	-	
4		I dealt as we are been the state birth in many list of more my
1		I don't remember that being high in my list of worry
2 3		areas. I wonder if it's simply that Alasdair Marnoch
3 4		being diligent, wanted to make sure if the risk profile of this set of issues particularly I think we were
4 5		worrying then about disclosure and some of the things
6		that had been in Susan Crichton's paper of 12 July, he
7		may simply have felt they needed to be notified.
, 8		But I don't remember particularly focusing on this
9		issue, I'm afraid.
10	Q.	We saw this morning the references to, for example, the
11	ч.	Shoosmiths case and potentially 85 claimants. We're now
12		at a stage where we have the Second Sight Interim
13		Report, potential class actions on the horizon. The
14		notification to the insurers was presumably quite
15		an important issue for Non-Executive Directors as
16		a whole, wasn't it?
17	A.	All I'm saying is I personally don't particularly
18		remember that being high on my list. Alasdair perhaps
19		had had experience of some other business where they had
20		needed to notify the insurers. I also don't remember
21		particularly focusing on material claims. I think I was
22		more focused on what are the steps we are taking around
23		what became the Mediation Scheme, trying to improve the
24		business processes because that was the single biggest
25		kind of issue I had in front of mind, that if there were
		90
1		7 August, and she is contacting you directly. If we
2		scroll down, we can see that's in response to the email
3		that was in this chain, the Alice Perkins email. If we
4		scroll up, we can see she says:
5		"Susannah hope you are having a good break,
6		please let me know if you would like to have
7		a discussion as per Alice's email, and I will organise
8		a time to meet/talk."
9		Did you speak to Susan Crichton at this point in
10		time?
11	Α.	No, I don't think I did because I've now seen an email
12		or note later in September, I think, where Susan
13		Crichton says she had spoken or exchanged emails with
14		the other NEDs and not me. So, from that record, I'm
15		inferring that I didn't. I don't know if, when we see
16		here, it's saying, "hope you are having a good break",
17		it is likely that, at that time, I was perhaps on
18		a holiday from work, I don't know.
19		But my I drew real comfort from the fact Alasdair
20		Marnoch was taking an active role in this work, as set
21	_	out in 16 July.
22	Q.	You were also at this time a Non-Executive Director at
23	-	the Post Office.
24	Α.	(The witness nodded)
25		

25 **Q.** Looking at it now, do you think that's an email that you 92

96

1		should have followed up on?	1		actions from the 16 July Board meeting would have been
2	Α.	I don't know if we know that I didn't follow up.	2		at the September Board meeting as a group.
3		I know, based on the information that I've seen, that	3	Q.	Let's have a quick look at the insurance notification
4		I didn't meet her, so I don't know if it was	4		itself. That's at POL00112856. This is an email that
5		a logistical thing and, by the time she was updating in	5		we've seen a few times before:
6		the autumn it hadn't happened. Of course, I think now,	6		"Please find attached details received of a new D&O
7		when you look at it, it would have been good to speak to	7		matter for your consideration. The notice concerns
8		her, not least because I now know all of the things	8		challenges which have been made to the accounting system
9		you've said about her not being in the room, and so on.	9		used in the Post Office Network"
10		But, at the time, I felt there was a clear set of	10		It says about halfway down that covering email:
11		actions, the Non-Executive Director, Alasdair, was	11		"A review of the Horizon system was undertaken and
12		taking a lead. So I'm not sure, in my shoes at the	12		whilst recommendations were made for improvements no
13		time, I did feel strongly and, obviously, if I had,	13		systemic problems were revealed which would call into
14		I would have done something different.	14		question the charges previously made against
	Q.	We have seen all of those emails from Alasdair Marnoch	15		subpostmasters. It is of concern to Post Office that
16		about the insurance position and the lack of clarity on	16		the expert of one prosecution witness, Dr Gareth Jenkins
17		the issue that he is chasing down.	17		of Fujitsu, may have failed to disclose certain problems
18		Did you have any discussion with Susan Crichton or	18		in the Horizon system potentially relevant to a case.
19		anybody else at this time about the notification to the	10		In the event it is discovered that improper prosecution
20		Post Office's insurers?	20		was undertaken, the risk exists of a claim being made
	Α.	No, not about the insurers. As I say, I'm pretty sure	20		against the Post Office and Directors and Officers for
21	ς.	it wasn't me who raised it at 16 July. I also wasn't	21		malicious prosecution [et cetera]. It is unclear at
22		the person charged with following up. So I wouldn't	22		this time the extent of possible exposure A copy of
23 24		particularly I would have seen some of these emails	23 24		
24 25			24 25		your slip is also attached"
20		coming in and the next opportunity to discuss any of the 93	25		If we go over the page, we can see the note that was 94
1		prepared by Bond Dickinson and we've addressed this with	1		obviously making some assertions.
2		witnesses from Bond Dickinson. It's over the page,	2		None of this, I think, came to us and it wasn't
3		please, there's a section on "Prosecutions &	3		something that we knew at the time, and I think you also
4		Convictions". Again, in similar words in relation to	4		showed an email where Chris Day is saying, "Don't send
5		Mr Jenkins, it says:	5		the Board the whole note, just do a paragraph".
6		"As noted above, where circumstances warrant, Post	6	Q.	Is this note or is the information contained in this
7		Office prosecutes subpostmasters Post Office is	7		note the kind of information that you would expect to
8		reviewing prosecutions	8		have been shared at Board level?
9		"Post Office has an obligation to consider whether	9	Α.	I can't really comment on this note <i>per se</i> because I've
10		further disclosure should be made to defendants. It is	10		only seen it for the first time a few days ago. I think
11		of concern to Post Office that the expert evidence of	11		the point I was trying to make before about not being
12		one prosecution witness, Dr Gareth Jenkins of Fujitsu,	12		blindsided, giving us early warning of risks and all of
13		may have failed to disclose certain problems in the	13		the areas that we discussed and are minuted in the
14		Horizon system potentially relevant to a case."	14		16 July Board meeting, to my mind, were the strongest
15		What were you aware of in respect of Gareth Jenkins	15		signal we, as a group of Non-Executive Directors, could
16		at this time?	16		have sent at that time that this was now, we understood,
17	Α.	I wasn't aware, I don't recall being aware of Gareth	17		to be a much more complicated issue, having received the
18		Jenkins until a long, long time later.	18		Second Sight Interim Report, we wanted to see a series
	Q.	Looking at this now, does this look to you to be a fair	19		of actions and we wanted to be aware of what was going
20		and accurate notification of the position?	20		on.
	A.	l thought you showed on the emails earlier, Alasdair	21		So, of course, now that I see all of this other
22		saying that there'd been a misunderstanding with Chris	22		information that we didn't see, I can't understand why
23		about whether it was D&O or which insurance. It feels	23		that wasn't shared with the Board, having given such
24		as if somewhere underneath in the business, some people	20		a strong signal at that time on this specific issue.
25		are instructing Bond Dickinson to write a note. They're	25		This was not a general signal; this was specifically
-0		95	20		96

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1	about all of the things that flowed from the Second	1		leaving ShEx and the Chairman agreed to discuss his
2	Sight Interim Report.	2		replacement and the ShEx representative on the Board
	. A concern that an expert witness had given unreliable	3		with Mark Russell, Chief Executive, ShEx."
4	evidence, whether it was in a case or many cases, would	4		Then it says:
5	you have expected that to have been brought to your	5		"Susannah Storey left the meeting."
6	attention?	6		Can you recall why you were only present for those
7 <b>A</b>	. Yeah, I mean, I think, as I was saying, there was a lot	7		first few items at that particular meeting?
8	of new news, certainly to me and I think to the other	8	Α.	Yes, this is the issue that I mentioned in my witness
9	Non-Executive Directors, at that 16 July Board meeting.	9		statement, that in the autumn of 2013, the then
10	After that, if there's any material risk, issue,	10		Government decided it wanted to take £50 off everybody
11	concern, worry, in my experience of Boards, when you're	11		energy bill in the country, and the people tasked by the
12	in a difficult phase, that's when you want and expect	12		Cabinet Secretary to do that, lead that work, was my
13	people to be at their most open.	13		jobshare partner and I. So just at this precise time,
14 <b>Q</b>	. In your view, why did that information not reach you,	14		it was very intense kind of conflict of roles, which
15	looking at what you know now?	15		meant I had to leave that meeting early.
16 <b>A</b>	. I don't know. I don't know.	16	Q.	We see there at (b) it's also a period of transition
17 <b>Q</b>	. Can we have look at the October Board meeting. That's	17		within ShEx itself; is that right?
18	at POL00158089.	18	Α.	My recollection is that Will Gibson was taking paternity
19	Thank you. It has you down as being present but	19		leave and so would be leaving the Shareholder Executive
20	only at items 13/97 to 13/99. If we scroll down, we see	20		team.
21	13/97 is the "Introduction". You then have a section on	21	Q.	So there are changes taking place in the Shareholder
22	"Government Funding and Strategic Plan". Over the page,	22		Executive team?
23	please, "Role of the Board" if we scroll down "and	23	Α.	(The witness nodded)
24	Relationship with ShEx Post-Funding". It says there:	24	Q.	You yourself have described it as an exceptionally busy
25	"The Board noted that Will Gibson would soon be 97	25		period of your career, outside of Post Office work; is 98
1	that right?	1		2013 that Mark Russell, who was the Director General by
2 <b>A</b>	. That was an exceptionally busy period in that role.	2		then of the Shareholder Executive, I think he came but
3	I've had many busy periods in my career.	3		the written information doesn't help me now work out
4 Q	. If we scroll down, we can see that, if we go over the	4		whether he which bits he came for.
5	page and over to another page, if we keep on scrolling	5	Q.	I think if we turn to the second page, there's a mention
6	down over to the next page, we have the "Chief	6		of Mark Russell in relation to the changes that are
7	Executives Report" and then we have at F, a section on	7		taking place. If we scroll down, at (b) there's
8	"Project Sparrow":	8		a reference to Mark Russell but I don't think he's
9	"Sir Anthony Hooper has now been appointed as	9		actually mentioned on the first page as being present or
10	Chairman of the Horizon Working Group. The business was	10		in attendance.
11	working to prepare the team of people to work on the	11		So you can't say whether he was there for the
12	mediation and case information necessary, as there were	12		discussion of Project Sparrow
13	likely to be up to 150 cases put to the Working Party	13	Α.	
14	for a decision on whether they progressed to the	14	Q.	
15	mediation process."	15		Non-Executive Director who was representing the
16	You weren't present at the Board during that	16		Government's interests on that Board during that
17	discussion of Project Sparrow; is that right?	17		discussion at the Board?
18 <b>A</b>		18	Α.	That's right.
19	terms of the chronology of when I left. I obviously	10	Q.	-
20	would have read the papers, including the Chief	20	ч.	"Chief Executive's Report". If we turn to page 5, we
21	Executive's update and including this update.	20		can see there's the section on Project Sparrow that's
		21		
	. But there was no Government representative on the Board	22		then discussed at that Board meeting.
22 <b>Q</b>	whilet this itom was boing discussed?			Isn't this exactly the period of time when it was
	whilst this item was being discussed? . Well, I was on the Board. I wasn't at the Board at this	23		important to have a ShEx representative sitting at the

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the sort of variable of whether or not things happened

But I had a sort of growing feeling through this

because, in another swim lane, as it were, we were just

about to announce the new funding, which was the thing

we'd been working on to make the business sustainable for the last year and a half. That was announced

So there was a lot going on, and yeah, that's why

I started my conversations with the Shareholder

Q. To summarise where we're at: busy Board, dealing not

just with Sparrow issues and Horizon issues but other

issues; you personally had a lot going on in your other

role; we've also discussed that you weren't physically

that a combination of factors that caused real issues?

model that was adopted after I left was better. There

A. I have said in my witness statement that I thought the

were structural obstacles, as we've discussed, in

relation to information sharing. I think, over time,

Government, and that -- I found that personally 102

particular occasion?

Working Group.

we can see there at (g):

integrity of the Horizon system":

yeah.

I felt that I was simply getting more distant from the

have provided your apologies. Again, is that because

the work at the new department was very busy on that

A. Yes, it's the same issue that was in those few weeks,

**Q.** On this occasion, if we scroll down, we can see there is

a significant update on Horizon, the Board has noted the

If we go over the page, we see there at (c) past

prosecutions being discussed; at (d) future prosecutions being discussed; there's a request for a note from the

go over to page 3, please, towards the bottom of page 3,

POL00027483. It's a paper prepared by Chris Aujard. If

"There is a risk that the allegations relating to

the integrity of the Horizon system, if not contained, could raise wider questions over the robustness of our

104

"The Board noted the update on Risk Management and

General Counsel explaining who was named in past

prosecutions and the liability for the business. If we

the actions being taken as set out in [that] paper." I'd like to take you to the paper. It's at

we have a look at 2.2, "Allegations relating to the

progress on Project Sparrow, there's discussion of the

present at ShEx any more, not part of ShEx any more. Is

I think, in November 2013.

Executive.

autumn that this was continuing to be a very complicated Board with a lot of difficult issues, not only this one

was my time. So I would do the work as needed.

1	A. I mean, I think the reason why we put a shareholder
2	representative on the Board after separation was because
3	we felt all the issues that the Post Office were dealing
4	with were difficult and important and, therefore, we
5	generally wanted to increase visibility. Of course,
6	I take your point, at this point, and at every Board
7	after 16 July, there was a discussion about the issues
8	that became known as Project Sparrow. Would it have
9	been better if I was there? Yes. Did I have
10	an irreconcilable conflict on that day? Yes. Was this
11	part of the reason why I concluded I simply couldn't
12	keep doing this role in the way that I wanted to? Yes.
13	And that is why, at this point, I started my
14	conversations with the Shareholder Executive to say that
15	I wanted to resign a year early.
16	<b>Q.</b> Was there any discussion prior to that point when things
17	started to become particularly busy in your other role,
18	as to somebody to replace you or step in for you?
19	A. I have been clear that I my other role was a job
20	share, so I was working three days a week, and my
21	jobshare partner was working three days a week, so in
22	every week, there would be two days where I wasn't
23	working in the office, doing meetings for that employer,
24	and, therefore, generally in that year, I felt I could
25	give sufficient time to the Post Office, and in a way,
	101
1	difficult. I haven't had any period of my career as
2	a civil servant when I've seen ministers less on
3	an issue than I did at this time. As I said in my
4	statement, I only saw Jo Swinson once, in February 2013.
5	So yes, I didn't think it was completely
6	satisfactory. Was it still better having me than no
7	one? Yes, I'm sure it was. But, you know, we could
8	debate counterfactuals.
9	<b>MR BLAKE:</b> Sir, that might be an appropriate moment to take
10	our lunch break.
11	SIR WYN WILLIAMS: All right. What time shall we resume?
12	<b>MR BLAKE:</b> We can come back at 2.00.
13	SIR WYN WILLIAMS: 2.00. Fine.
14	(12.58 pm)
15	(The Short Adjournment)
16	(2.02 pm)
17	SIR WYN WILLIAMS: I see you've demoted Mr Beer, Mr Blake.
18	Very good. Off you go.
19 20	MR BLAKE: Thank you very much.
20	Before the break, we were looking at the 31 October
21	2013 Board meeting. I am now going to turn to the
22	November Board meeting, and that can be found at
23	POL00021520.
24 25	Thank you. These are the minutes and we can see
25	there that you are not in attendance on that day and 103

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So --

2 Q. If we can turn back to the minutes themselves it's

POL00021520. I mean, there was discussion at this

1		core systems and our ability to operate, damaging
2		(amongst other matters) current partnerships, new areas
3		of expansion and public and government confidence."
4		This meeting, would you accept, was an important
5		Board meeting in the context of Horizon issues?
6	Α.	I think all the Boards, as I've said, after July, were
7		important on this issue because each one took an update,
8		yeah.
9	Q.	Here we have the risk management update referring there
10		to potential issues to do with Government confidence
11		arising from Horizon. Wasn't that an important moment
12		to have the Government representative on the Board
13		present at the Board meeting?
14	Α.	I'm not sure the paper and the moment, if you see what
15		I mean, are the key thing. The bigger point you're
16		making is that I wasn't present at that Board, which, as
17		I've described, was because of my other role. I would
18		have read the papers I would have been doing the
19		follow-up around the edges, including with the
20		Shareholder Team. It's not totally clear to me whether
21		that point on Government confidence is actually about
22		the revenue lines from Government or more widely but,
23		absolutely, I mean, this issue was extremely
24		significant. We'd put in train all of these actions.
25		It was high now on the Post Office's risk register. 105
		100
1		that I had these concerns.
2		I don't think it would have been very easy just to
2 3		I don't think it would have been very easy just to sub-in a person who wasn't a Board member, as a sort of
2 3 4		I don't think it would have been very easy just to
2 3		I don't think it would have been very easy just to sub-in a person who wasn't a Board member, as a sort of observer, if that's what you mean. But I did feel and that's why I took the steps to step down from this
2 3 4		I don't think it would have been very easy just to sub-in a person who wasn't a Board member, as a sort of observer, if that's what you mean. But I did feel and that's why I took the steps to step down from this Board because I felt whoever did it needed to be there
2 3 4 5		I don't think it would have been very easy just to sub-in a person who wasn't a Board member, as a sort of observer, if that's what you mean. But I did feel and that's why I took the steps to step down from this Board because I felt whoever did it needed to be there and, as you know and as I've said in my statement, I was
2 3 4 5 6 7 8		I don't think it would have been very easy just to sub-in a person who wasn't a Board member, as a sort of observer, if that's what you mean. But I did feel and that's why I took the steps to step down from this Board because I felt whoever did it needed to be there and, as you know and as I've said in my statement, I was very clear to my successor, which in the end ended up
2 3 4 5 6 7 8 9		I don't think it would have been very easy just to sub-in a person who wasn't a Board member, as a sort of observer, if that's what you mean. But I did feel and that's why I took the steps to step down from this Board because I felt whoever did it needed to be there and, as you know and as I've said in my statement, I was very clear to my successor, which in the end ended up being Richard Callard, that he needed, in my view, to be
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2 3 4 5 6 7 8 9 10 11		I don't think it would have been very easy just to sub-in a person who wasn't a Board member, as a sort of observer, if that's what you mean. But I did feel and that's why I took the steps to step down from this Board because I felt whoever did it needed to be there and, as you know and as I've said in my statement, I was very clear to my successor, which in the end ended up being Richard Callard, that he needed, in my view, to be on both the Sparrow Subcommittee, which was the place where these issues were being principally addressed, and
2 3 4 5 6 7 8 9 10 11 12		I don't think it would have been very easy just to sub-in a person who wasn't a Board member, as a sort of observer, if that's what you mean. But I did feel and that's why I took the steps to step down from this Board because I felt whoever did it needed to be there and, as you know and as I've said in my statement, I was very clear to my successor, which in the end ended up being Richard Callard, that he needed, in my view, to be on both the Sparrow Subcommittee, which was the place
2 3 4 5 6 7 8 9 10 11 12 13	Q.	I don't think it would have been very easy just to sub-in a person who wasn't a Board member, as a sort of observer, if that's what you mean. But I did feel and that's why I took the steps to step down from this Board because I felt whoever did it needed to be there and, as you know and as I've said in my statement, I was very clear to my successor, which in the end ended up being Richard Callard, that he needed, in my view, to be on both the Sparrow Subcommittee, which was the place where these issues were being principally addressed, and on the Audit and Risk Committee. Looking back at those two meetings that we've just been
2 3 4 5 6 7 8 9 10 11 12 13 14	Q.	I don't think it would have been very easy just to sub-in a person who wasn't a Board member, as a sort of observer, if that's what you mean. But I did feel and that's why I took the steps to step down from this Board because I felt whoever did it needed to be there and, as you know and as I've said in my statement, I was very clear to my successor, which in the end ended up being Richard Callard, that he needed, in my view, to be on both the Sparrow Subcommittee, which was the place where these issues were being principally addressed, and on the Audit and Risk Committee. Looking back at those two meetings that we've just been looking at, do you think there were missed opportunities
2 3 4 5 6 7 8 9 10 11 12 13 14 15	Q.	I don't think it would have been very easy just to sub-in a person who wasn't a Board member, as a sort of observer, if that's what you mean. But I did feel and that's why I took the steps to step down from this Board because I felt whoever did it needed to be there and, as you know and as I've said in my statement, I was very clear to my successor, which in the end ended up being Richard Callard, that he needed, in my view, to be on both the Sparrow Subcommittee, which was the place where these issues were being principally addressed, and on the Audit and Risk Committee. Looking back at those two meetings that we've just been looking at, do you think there were missed opportunities there, where
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16	Q. A.	I don't think it would have been very easy just to sub-in a person who wasn't a Board member, as a sort of observer, if that's what you mean. But I did feel and that's why I took the steps to step down from this Board because I felt whoever did it needed to be there and, as you know and as I've said in my statement, I was very clear to my successor, which in the end ended up being Richard Callard, that he needed, in my view, to be on both the Sparrow Subcommittee, which was the place where these issues were being principally addressed, and on the Audit and Risk Committee. Looking back at those two meetings that we've just been looking at, do you think there were missed opportunities there, where Um, I've I've set out in my statement a series of
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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	Α.	I don't think it would have been very easy just to sub-in a person who wasn't a Board member, as a sort of observer, if that's what you mean. But I did feel and that's why I took the steps to step down from this Board because I felt whoever did it needed to be there and, as you know and as I've said in my statement, I was very clear to my successor, which in the end ended up being Richard Callard, that he needed, in my view, to be on both the Sparrow Subcommittee, which was the place where these issues were being principally addressed, and on the Audit and Risk Committee. Looking back at those two meetings that we've just been looking at, do you think there were missed opportunities there, where Um, I've I've set out in my statement a series of reflections and missed opportunities. I didn't particularly think these this meeting and the one before fell into that but it's obviously hard to say when I wasn't at the meeting. Moving on to discussions regarding the Post Office's prosecution role. You were party to some of those
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	Α.	I don't think it would have been very easy just to sub-in a person who wasn't a Board member, as a sort of observer, if that's what you mean. But I did feel and that's why I took the steps to step down from this Board because I felt whoever did it needed to be there and, as you know and as I've said in my statement, I was very clear to my successor, which in the end ended up being Richard Callard, that he needed, in my view, to be on both the Sparrow Subcommittee, which was the place where these issues were being principally addressed, and on the Audit and Risk Committee. Looking back at those two meetings that we've just been looking at, do you think there were missed opportunities there, where Um, I've I've set out in my statement a series of reflections and missed opportunities. I didn't particularly think these this meeting and the one before fell into that but it's obviously hard to say when I wasn't at the meeting. Moving on to discussions regarding the Post Office's prosecution role. You were party to some of those discussions in February 2014. By that stage, had
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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	Α.	I don't think it would have been very easy just to sub-in a person who wasn't a Board member, as a sort of observer, if that's what you mean. But I did feel and that's why I took the steps to step down from this Board because I felt whoever did it needed to be there and, as you know and as I've said in my statement, I was very clear to my successor, which in the end ended up being Richard Callard, that he needed, in my view, to be on both the Sparrow Subcommittee, which was the place where these issues were being principally addressed, and on the Audit and Risk Committee. Looking back at those two meetings that we've just been looking at, do you think there were missed opportunities there, where Um, I've I've set out in my statement a series of reflections and missed opportunities. I didn't particularly think these this meeting and the one before fell into that but it's obviously hard to say when I wasn't at the meeting. Moving on to discussions regarding the Post Office's prosecution role. You were party to some of those discussions in February 2014. By that stage, had

3		FOLU0021520. Thean, there was discussion at this
4		meeting. This was the meeting where past prosecutions
5		were discussed, future prosecutions were discussed.
6	Α.	Well, the Audit and Risk Committee had taken
7		a discussion on the future prosecutions paper and hadn't
, 8		reached a decision, and then decided to come back in
9		February, as we then see, including with the discussion
10		at the full Board but yes, I mean, a whole series of
11		important issues were being discussed at this and the
12	_	other Board meetings.
13	Q.	At this time, you also weren't sitting on the Audit and
14		Risk Committee any more?
15	Α.	I was not.
16	Q.	Why not put in place an immediate replacement at this
17		stage?
18	Α.	Well, when you're appointed to a Board, there's a whole
19		series of things happen and, in order to be replaced,
20		the Shareholder Team needed to find a replacement, the
21		Post Office would have to accept that replacement and
22		the steps would have to be taken. So I think I was
23		flagging, at this stage, as I already said, to Mark
24		Russell, who was my line manager and the Director
25		General and responsible for the Shareholder Executive,
		106
1	•	It was completed. It had been implemented and the
	Α.	It was completed. It had been implemented and the
		austomore who were getting that discount had get it. So
2		customers who were getting that discount had got it. So
2 3		yes, it was a short, intense period that just happened
2 3 4		yes, it was a short, intense period that just happened to coincide with this November Board meeting.
2 3 4 5	Q.	yes, it was a short, intense period that just happened to coincide with this November Board meeting. Thank you. If that could come down, please.
2 3 4 5 6	Q.	yes, it was a short, intense period that just happened to coincide with this November Board meeting. Thank you. If that could come down, please. By February 2014, there seemed to be three options
2 3 4 5 6 7	Q.	yes, it was a short, intense period that just happened to coincide with this November Board meeting. Thank you. If that could come down, please. By February 2014, there seemed to be three options on the table, Options A, B and C: Option A being
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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		yes, it was a short, intense period that just happened to coincide with this November Board meeting. Thank you. If that could come down, please. By February 2014, there seemed to be three options on the table, Options A, B and C: Option A being preservation of the status quo; Option B focusing more on egregious conduct; and Option C being ceasing all prosecution conduct. I'm going to turn to a few documents where those options are discussed, where you have contributed. Can we please start at POL00167751. It's page 4, 7 February 2013. Thank you. If we turn to page 4, we can see there is an email chain. Can you assist us, this is referring to an Audit and Risk Committee teleconference on the 11 February. You're copied into or you're a recipient of that email: can you assist us with why that would have been sent to you at that time? So my understanding is that in November 2013, the Audit and Risk Committee had taken a paper on future prosecutions, which at the time had Options A to D. They asked for more information and, therefore, it was

Q. Thank you. If we scroll up, please, to page 3. We see there Alice Perkins has contributed her view, that

to live with this, why are we different?"

If we scroll down, she says:

to monitor our agents easily ...

ongoing anyway."

the paper to back it up.

Q. Had you discussed it with ShEx at all?

A. I don't remember having discussed this ARC paper, bearing in mind we got it a few days before, at the time

expressed in that previous email?

A. I mean, I think the -- what I wrote here speaks for itself. I hadn't been in the November 2013 ARC

savs:

ours ..."

Option C has been dismissed "too summarily". She says: "I do of course understand that we couldn't just throw our cases at the CPS and walk away at a moment's notice. And I appreciate that we might find the CPS route less satisfactory in cases where we were convinced we should be prosecuting. But if it is the case that the banks and other financial institutions are content

Could I please turn to UKGI00043711. We then have Paula Vennells' contribution to this discussion, and she

"I thought it would be worth sharing my thoughts on

"The difference and perhaps not immediately obvious to our leading Counsel is scale. None of the businesses Brian Altman compared us to has a network the size of

"We are more complex and operate without the ability

"This is an important area for the business and so 110

Can you assist us with why you took the view you did, as opposed to the view that Paula Vennells has

discussion nor would I therefore have seen the ARC paper which came in November 2013. So, notwithstanding the trail in on this issue, this was the first time that I'd seen it, and I think I would have had in my mind all of the things that we had set in train as actions, and the papers we'd read from the 12 July paper onwards, the year before, and I felt instinctively uncomfortable with prosecutions and I didn't think the data was there in

any other organisation, to the extent we could get comparable data, would have anything like this level of situations that need investigation. Either way, I would have thought any next steps must be accompanied by more focus on training and better support. But sure that's

why we are different; in my mind it relates to the operational nature of [Post Office] rather than product or services, where there is more commonality:

1		which was in February 2014.	1
2		Although I wasn't on the Audit and Risk Committee,	2
3		I think the decision had been taken at the previous	3
4		Audit and Risk Committee that the full Board should at	4
5		least be able to provide their input on the options set	5
6		out in the paper but the actual decision was going to be	6
7		taken by the Audit and Risk Committee. So my	7
8		understanding of this Friday, 7 February 2014 email is	8
9		that that is that Audit and Risk Committee paper being	9
10	~	sent to us.	10
11 12	Q.	<b>3</b> 1 7 <b>3 3</b>	11 12
12		commitments, was that an opportunity where you could have rejoined the Audit and Risk Committee?	12
13	Α.		13
15		about the following year and which committees to sit on,	15
16		I felt that was for the year. It was quite difficult,	16
17		I think, to chop and change, in terms of committee	10
18		membership.	18
19	Q.	At this point, there was still not a Government	19
20	-	representative on the Audit and Risk Committee?	20
21	Α.	No, nothing had changed in the sense that, from April	21
22		2013 until April 2014, there wasn't a Government	22
23		representative. At April 2014, when, in the end,	23
24		Richard Callard took over from me, he was on the Audit	24
25		and Risk Committee.	25
		109	
1		Low particularly grateful to our Max Evenutive	1
1 2		I am particularly grateful to our [Non-Executive Directors] for your attention. We will do what we can	1
2		to facilitate a good debate."	3
4		At that point in time, can you recall what the	4
5		different positions were amongst the Board?	5
6	Α.	You mean at 22.57 on Sunday night?	6
7	Q.		7
8	Α.	Well, I think it's, as just shown, the paper had come	8
9		round, Alice had set out her position, Paula has just	9
10		disclosed. There was actually a chain, I think, where	10
11		everybody was replying and I replied on the Monday	11
12		morning, just after 7.00 am.	12
13	Q.		13
14		the first page, and you say:	14
15		"Thanks for copying me on these papers and given	15
16		I am not on the [Audit and Risk Committee Audit], I am	16
17		just passing my thoughts for information. But my read	17
18		of the paper was similar to Alice's. It doesn't seem we	18
19		had sufficient reasons for discard Option C and I think	19
20		it would be interesting to explore further. It seems	20
21		hard to imagine in 2014 [the Post Office] is so	21
22		different from other organisations to necessitate this	22
23		approach.	23
24		"As an aside, I also find the statistics for [the	24
25		Post Office] surprising and I can't help wondering if	25
		111	

0	0		
of my reply.	This would be the	sort of thing I wa	IS
doing as a B	loard member with	my Board hat on	ı, so
	112		

1		I wouldn't routinely check with them before.	1
2		I certainly would have been discussing it with them,	2
3		though, because Richard Callard obviously was getting up	3
4		to speed. He was the new Will Gibson, in my mind, and	4
5		I certainly would have told him what I thought about	5
6		this and, as you know, he came also to the February and	6
7	_	to the March Board.	7
8	Q.	Absolutely. Let's have a look at those Board minutes,	8
9		please. Can we please turn to POL00021522. This is the	9
10		26 February Board meeting. It lists you as being	10
11		present and Mr Callard as being in attendance.	11
12 13		If we scroll down, we can see:	12 13
13		" the Chairman opened the meeting and welcomed	
14		Richard Callard, Non-Executive Director designate, Shareholder Executive, who would be attending this and	14 15
16		the March Board before taking over from Susannah	15
17		Storey."	10
18		Can we scroll down, please, to the bottom of page 2,	18
19		"Review of the Current Prosecution Policy", and then	19
20		over the page we see that:	20
21		"The Board approved the implementation of Option B	21
22		as a new prosecutions policy"	22
23		Do you recall speaking up in favour of your	23
24		preferred option, Option C?	24
25	Α.		25
		113	
1		raised, so that is a moment at which you're not present	1
2		at this particular Board. It says:	2
3		"The Board discussed the Professional Indemnity	3
4		insurance and the Sparrow compensation risks. The CFO	4
5		explained that [Professional Indemnity] insurance could	5
6		only cover incidents for which the Business was legally	6
7		responsible. Therefore any combination paid outside	7
8		that legal requirement could not be covered by	8
9		[Professional Indemnity] insurance.	9
10		"The Board asked the Business to consider enhancing	10
11		its insurance expertise and to reconsider how it tracks	11
12		events and near misses which should be reported to the	12
13		insurers. The CFO was asked to provide an update for	13
14		the next ARC on his proposal for [Professional	14
15		Indemnity] insurance."	15
16		So you can't recall why it was that you weren't	16
17		present at this meeting for this discussion?	17
18	Α.	No.	18
19	Q.	Again, looking at this now, does that seem like	19
20		a relatively significant moment, the discussion of the	20
21		insurance position relating to Project Sparrow?	21
22	Α.	No. My view on the insurance issue is as we'd already	22
23		discussed earlier today. I think this would probably be	23
24		the follow-up from all of the actions initiated in July,	24
25		which Alasdair had been taking forward. 115	25

<ul> <li>then this was being considered by the ARC. I can't remember if, in the room, those of us who had</li> <li>a different view expressed it again but when you don't</li> <li>chair a subcommittee, no one Board member has a veto.</li> <li>It's I'm not sure at this point I would have changed</li> <li>it but I can't remember if I said anything in particular.</li> <li>Q. Can we please turn to POL00021523, and this is the March meeting. This was your final Board meeting, was it?</li> <li>A. It was.</li> <li>Q. We have you down for items 14/31 to 14/38. Richard</li> <li>Callard present. Was there a particular reason why you were only present for part of that meeting?</li> <li>A. I can't recall now why that was.</li> <li>G. If we scroll down, we can see Project Sparrow is addressed:</li> <li>"The CEO reminded the Board of the background to Sparrow and the Initial Complaint Review and Mediation Scheme, and introduced the work which Linklaters had</li> <li>been asked to undertake to clarify the Company's legal position."</li> <li>So you were present for the discussion regarding Project Sparrow and Linklaters.</li> <li>If we scroll down to page 8, please. At 14/43 we have the "Project Sparrow Insurance" issue being 114</li> <li>A. I think the point you're making is about information do you think it would have been helpful to have scrutinised the insurance notification more, at Board level?</li> <li>A. I think the point you're making is about information that was coming to the Board, which could have helped overall in this situation and, obviously, as I said</li> <li>before, if we had seen some of those papers, if the Executive had provided some of those papers, if the Summer of 2013, would that have made the difference? My answer is yes.</li> <li>Q. There's reference in these Board minutes to the Linklaters advice. I'd very briefly like to take you to that. That's at POL00030724. The Linklaters advice can the Board.</li> <li><b>A.</b> Yes, I do, and the partner came to the Board.</li> <li><b>A.</b> Yes I do, and the part</li></ul>			
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1	Α.	As a general rule in all the Board conversations and
2		situations I've seen, and, you know, even now, thinking
3		about me as an executive with a Board of Non-Executive
4		Directors, you don't always share all of the underlying
5		information but what you do expect is, if the underlying
6		information is material, that it's being accurately
7		summarised and, if there's something particular that
8		would benefit the reader from seeing the whole paper,
9		that you share the whole paper.
10		So I think me as the Board wanted that Linklaters
11		advice. It was something we commissioned ourselves. So
12		I think I found it helpful to see both the paper and the
13		partner, as it were.
14	Q.	If we scroll over the page, please, we can see the
15		"Executive Summary". The Linklaters advice, it says
16		summarises:
17		" our key conclusions on the legal analysis of
18		the complaints made by [postmasters] about Horizon."
19		At 1.3 it says:
20		"The key factual issue is whether and to what extent
21		Horizon might be said to be reliable, what defects there
22		may be in it and how any such defects might manifest
23 24		themselves and translate into errors in the state of the account between an individual [subpostmaster] and the
24 25		Post Office. Such relevant legal risks as exist arise
20		117
1		something more complicated, and I think we felt that, as
2		well as all of the work described in paragraph 140 of my
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3		
3 4		statement, we wanted then to have this Deloitte piece of
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4 5		statement, we wanted then to have this Deloitte piece of work, which was a way of looking at the IT problems. This Linklaters piece of work was a question of legal
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4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	Α.	statement, we wanted then to have this Deloitte piece of work, which was a way of looking at the IT problems. This Linklaters piece of work was a question of legal issues and compensation, and so on. Wasn't the functioning of the system quite an obvious and large stone to unturn, though? Well, the Second Sight work had been looking at the system and related issues. The 8 July report, the Interim Report, as we've discussed, had a series of complicated and difficult messages: on the one hand the words "no systemic issues" but, on the other hand, it was very clear through the spot reviews that a combination of factors could create problems. So, at the time, I think we felt taking the actions, including with the Mediation Scheme and the other steps, was a way to try and be prudent about this set of issues but we also, as a Board, hadn't commissioned anything other than the Second Sight Interim Report. So I think this was it felt at the time another important step. I'm going to turn to one final issue very briefly, and that's risk reporting. Prior to becoming

1		only in the event that there are provable malfunctions
2		in the Horizon system which are causative of losses on
3		the part of the [subpostmaster]."
4		From your perspective, was it not important at this
5		time to grapple urgently with whether the system was in
6		fact reliable, which is something that wasn't addressed
7		by this advice?
8	Α.	Yeah, and I think that's why, at this Board, and then
9		afterwards, the Deloitte work was commissioned because
10		the premise of this advice as set out was and I'm
11		summarising, these might not be the right words but
12		the system works. So I think what Linklaters were
13		saying, which we agreed with, was you need to get some
14		basis check that point.
15	Q.	We're now in March 2014.
16	Α.	(The witness nodded)
17	Q.	Why, in your view, are things moving so slowly in that
18		respect?
19	Α.	I think if you look at the long arc of this issue where,
20		unfortunately, problems have been arising for over
21		a decade, this to us at the time, to us as a Board,
22		who'd had the Second Sight Interim Report in July 2013,
23		actually felt that we'd taken a lot of actions, we were
24		trying to uncover things, and move at pace. Of course,
25		often with complex issues, each stone you lift, you find
		118
1		aware of?
2	Α.	So during my time in the Shareholder Executive, I joined
3		in 2006, I worked on a few different situations and, in
4		simple terms, I think the role of that team looking
5		after a series of different situations, evolved and
6		matured, including in relation to risk reporting.
7		So we used to have quarterly meetings in relation to
8		the individual companies or projects, if it wasn't
9		a company, and the risk reporting was on a journey of
10		improvement. I don't remember thinking it's hard to
11		think back now to all of the different iterations.
12		I think it was broadly in line with best practice at the
13		time, for example, when the Department or in the private
14		sector. If you looked at it now, with a 2024 hat on,
15		I think you'd think it was quite unsophisticated. But
16	_	I don't think we were particularly out of line.
17	Q.	Did the system change while you were a Non-Executive
18		Director in respect of your ability to report risks to
19 00		ShEx?
20	Α.	When I was a Non-Executive Director, I would have been
21		primarily interfacing with the Post Office's risk
22		practices and what we did as that Board through the
23		Audit and Risk Committee to improve our risk managemen

- 23 Audit and Risk Committee to improve our risk management
- 24 and to look at different areas of what I would call the
- 25 control environment. As we've discussed, I would be 120

1		giving reflection, views, commentary to the Shareholder
2		Team. They were then responsible for what was in the
3		risk registers that they were managing. So I wouldn't
4		have seen those risk registers that they had after the
5		14 March 2012, when I left the building.
6	MR	BLAKE: Thank you, sir, those are all the questions
7		I have.
8		Questioned by SIR WYN WILLIAMS
9	SIR	WYN WILLIAMS: Before CPs ask any questions, I have been
10		musing about this debate that the Board had about
11		Options B or C, in terms of Prosecution Policy, all
12		right, and clearly there was a difference of view about
13		it. But in the discussions which did take place, was
14		there any acknowledgement or discussion that, in
15		Scotland and Northern Ireland, nobody but for the CPS
16		could prosecute and was that not considered as
17		a material factor in terms of England and Wales?
18	Α.	I do have a background recollection of that but, now
19		that you say it, I don't know why it wasn't in that
20		paper. So I can't recall I can't recall why. I just
21		remember feeling myself uncomfortable.
22	SIR	WYN WILLIAMS: Yes, and I understand there was
23		a difference of view, and I'm not necessarily expecting
24		that you would have known personally

25 A. No, no, I get your point.

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- 1 didn't feel able to say whether the Board was
- 2 deliberately being kept in the dark by the Executive.
- 3 That's how you put it in your statement, not exactly
- 4 those words, but broadly. What I'd like to do is show
- 5 an email that the Inquiry has seen a few times to see if
- 6 we can get any closer to an answer on that. So if we
- 7 could look, please, at POL00382001, and this is the
- 8 email which has come up a few times. It's between
- 9 Ms Vennells and Ms Perkins about an unsafe witness. It
  10 dates from November 2013, and hopefully you've seen it
- 11 before.

17

12 A. Yeah, I've seen that one.

13	Q.	But I'd like to just zoom in on the important words. If
14		we could scroll down a little to "My concern", the email
15		begins between Ms Vennells and Ms Perkins or rather
16		the paragraph within it. Yes.

So there we are at the bottom.

18 "My concern re Sparrow currently is our obligations
19 of disclosure re an unsafe witness (the representative
20 from Fujitsu made no statements about no bugs, which
21 later could be seen to have been undermined by the SS
22 report). We do not think it material but it could be
23 high profile."

- 24 So that actually very succinctly encapsulates what
- 25 Mr Clarke enunciated much more fully in his Advice.

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- 1 SIR WYN WILLIAMS: -- but someone in that Board would have
- 2 known --
- 3 A. Yeah.
- 4 SIR WYN WILLIAMS: -- that in Scotland and Northern
- 5 Ireland --
- 6 A. Yeah, it was a different --
- 7 SIR WYN WILLIAMS: -- it had to be the Procurator Fiscal or
- 8 the CPS version in Belfast --
- 9 **A.** Yeah.
- 10 SIR WYN WILLIAMS: -- so to speak.
- 11 A. Yeah.

16

- 12 SIR WYN WILLIAMS: Okay.
- 13 MR BLAKE: Thank you, sir. It's Ms Page and then Mr Stein.

#### 14 Questioned by MS PAGE

- 15 MS PAGE: Thank you.
  - In your statement, Ms Storey, you describe
- 17 a critical moment in the summer of 2013 when the Board
- 18 was deprived of the information it needed, and you say
- 19 "at precisely the time when the Executive should have
- 20 been at their most open with us". The information you
- 21 were talking about was the information that was within
- 22 the Clarke Advice, that Gareth Jenkins had been acting
- 23 as an expert witness and that he was "tainted".
- 24 **A.** Yes.
- 25 **Q.** On that issue, in your statement, you said that you 122

1		Would you have wanted to know about this unsafe witness
2		and the obligation to disclose the fact that he had made
3		statements about there being no bugs; would you have
4		wanted to know about that?
5	Α.	Of course. Of course.
6	Q.	Do you think that the Board's discussions, in the months
7		leading up to November, would have made it clear to
8		Ms Vennells and Ms Perkins that the Board would want to
9		know about that unsafe witness?
10	Α.	I do. I've hopefully tried to give a general sense that
11		we were quite a difficult set of Non-Executive Directors
12		and we wanted to know things and, when something goes
13		wrong, yeah, I think those are the times when you need
14		to be absolutely as open as you can. And in my
15		preparation for this Inquiry, I've now seen a lot of
16		documents that I didn't see at the time, and I would say
17		even since I wrote my witness statement my position on
18		this issue has hardened.
19	Q.	When you say "hardened", can you tell us exactly what
20		you mean by that?
21	Α.	I mean that I've seen a number of things that I think
22		were relative, contextual information that add to the
23		weight of the issues being significant, which were then
24		not reported to us as significant. So an example that
25		I was reading about last week was that Shoosmiths did

1		put written evidence to the 15 May Department of	1
2		Business Select Committee. They didn't appear at the	2
3		hearing. Paula Vennells and George Thomson appeared.	3
4		That's an example of something. We then met as a Board	4
5		the week later, that Select Committee is referenced.	5
6		The Select Committee itself didn't pick up that issue in	6
7		its own response, but it makes me think there was quite	7
8		a lot of information which was important and relevant.	8
9		Obviously, I'm applying hindsight, you know, I can't	9
10		put myself in the shoes of those people, which is why	10
11		I phrased it in the way I did in my statement.	11
12	Q.	Mr McCausland told us yesterday, and obviously on the	12
13		same page as you in this respect, that the Board did not	13
14		know about the contents of the Clarke Advice, but he	14
15		also said that he was told that there was a Fujitsu	15
16		expert witness that could not be used any more but that	16
17		person could not be used any more because they had moved	17
18		on or they had retired or some such. He wasn't given	18
19		a name. The important point, perhaps, is that he was	19
20		given the impression that there was an innocuous reason	20
21		for that witness not to be used any more and therefore	21
22		the taint was hidden. And he thought that that was	22
23		perhaps some time in the latter half of 2013. Do you	23
24		remember being told anything like that?	24
25	Α.	I do not. I heard what he said yesterday when I watched	25
		125	
1		properly tomorrow. I thought the Board were generous in	1
2		their patience tonight over the SS discussion. It is	2
3		helpful to know that they are supportive of the need to	3
4		be robust. That said, I thought Alasdair's intervention	4
5		was good it is why we haven't been completely	5
6		heavy-handed yet. We can discuss nuances and next steps	6
7		tomorrow."	7
8		Now, what do you recall of the meeting that would	8
9		have led her to say that the Board were supportive of	9
10		the need to be robust?	10
11	Α.	I can't be sure because this is an email exchange	11
12		between her and Alice. I am assuming I'm just	12
13		assuming it could have related to the point she was	13
14		making on that call about the need for factual accuracy	14
15		and, obviously, we were being told that day that this	15
16		report was going to go into the public domain, the	16
17		executive were not happy with it, they were concerned	17
18		about accuracy and they then went on to tell us about	18
19		that. So it may be that she's referencing the need to	19
20		be robust with Second Sight about the need to be	20
21		accurate and factual. But I can't be sure.	21
22	Q.	Do you think that the Board was supportive of her view	22
23		on that?	23
24	Α.	I think, yeah, I think the Board heard what Paula said	24
25		on that call. We absolutely wouldn't have wanted	25
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- 1 it last night. I don't recall that.
- 2 **Q.** No.
- A. Bear in mind that Neil, as a Senior Independent
- Non-Executive Director, would have been in and around
- the business perhaps a bit more, so perhaps he had some
- other conversations.
- Q. And possibly also went to those Board meetings which you
   didn't, in the latter half of 2013?
- 9 **A.** That's true. That's true.
- Q. That was, of course, at the same time or around the same time as the insurers were being informed and given the
- 2 name Gareth Jenkins. So, again, coming back to this
- 3 point, does this show that the Board was actually being
- 4 kept in the dark, as it were? You were not being told
- 15 about Gareth Jenkins but insurers were?
- 16 A. There was obviously a significant asymmetry of
- 17 information between what we were getting, which you've
- 18 seen -- both the papers and the minutes -- and what some
- 19 other parties were aware of and were getting.
- 20 Q. All right. Can we look, please, at another email.
- 1 POL00296944. This is just going back a little bit to
- the 1 July telephone Board meeting and the reaction
- 3 afterwards. This is Paula Vennells to Alice Perkins at
- 24 9.07 pm, so on the day but afterwards:

25 "Hi Alice, I'm looking forward to catching up 126

1		a document to go into the public domain that wasn't
2		factually accurate and we did trust the Executive. We
3		had no reason not to. So yeah, there's no reason,
4		I think, that this would be incorrect. What she's
5		reporting is her view of what we thought, having been
6		sorry, that's not a great sentence.
7	Q.	No, understood.
8		Then sort of counterposed with that, she says:
9		"That said [so, in other words 'on the other hand']
10		I thought Alasdair's intervention was good it is why
11		we haven't been completely heavy-handed yet."
12		Can you decode that for us at all; does that make
13		any sense?
14	Α.	I don't recall what specifically Alasdair said.
15		I wonder if it's to do with the interface with Second
16		Sight and, you know, it's plausible, isn't it, because
17		it was a debate later, that there was a concern about
18		the scope and time their work was taking and the cost,
19		the sort of desire to have some fixed parameters around
20		it. So it may be that it was a reference to that and so
21		Paula sort of implying that she might in due course
22		need, in her words, to be heavy-handed with Second
23		Sight. But I can't be sure.
24	Q.	All right, well, it carries on:
25		"I caught up with Susan this evening after we
		128

1		finished. She had finished her meeting with [Second
2		Sight] and [presumably this is 'and was of the view']
3		that they do now understand the risk of being caught up
4		in something bigger and more sensitive. She is hoping
5		their report should be more balanced, should say they
6		have found no evidence of systemic Horizon (computer)
7		issues but will confirm shortcomings in support
8		processes and systems, and that Post Office has already
9		identified and corrected number of these. I hope when
10		they speak to James tomorrow that they will confirm all
11		this. They will also want to say their work is not
12		finished and therefore still not conclusive."
13		Then she says this:
14		"Not a final position by any means nor one that
15		controls what they might say rather than write but
16		sounding slightly better."
17		Do you know that the business were making efforts to
18		control what was written by Second Sight?
19	Α.	Not in that way as described there and it was
20		an independent report, so no.
21	Q.	Then particularly she seems to be pleased, shall we
22		say or perhaps that's inferring too much, but in any
23		event she reports that Susan Crichton had told them
24		about the risks of being "caught up in something bigger
25		and more sensitive". Again, I hope I'm not reading too
		129
1		point says:
2		"She does remember it becoming an increasing thing
3		after joining. Remembers Paula indicating that there
4		was nothing much to see here, it was a small number of
5		subpostmasters, long time ago, the business was getting
6		assurance etc"
7		But then in the next bullet:
8		"NEDs and Alice increasingly worried at the
9		seemingly slow pace of the execs' response and Arbuthnot
10		had started to fan the flames. The Board felt this was
11		mischief making that was fanning the flames and was
12		becoming a populist cause."
13		If that's the correct reporting of your
14		conversation, where is this idea of mischief making,
15		fanning the flames, a populist cause, coming from?
16	Α.	Yeah, I only saw this email very recently. I didn't
17		know I did meet Richard Callard from time to time,
18		I wanted to make sure he was getting the support he

- 18 I wanted to make sure he was getting the support he
- needed. I do recall having various conversations withhim, including presumably one in March or April 2020.
- 21 I didn't know he was taking notes, I didn't know he was
- 22 recording it and I can't say exactly where all of these
- 23 things have come from. Obviously, what I've tried to do
- 24 in a very open way is set out my recollections and my
- 25 reflections in my witness statement, and that is after
  - 131

- much, but it's sort of an implied threat, isn't it? Did
- you know that the business was involved in sort of
- 3 warning Second Sight of risks?
- 4 **A.** No, I don't really know what that sentence means.
- 5 I have to say, the end of it, the "something bigger and
- 6 more sensitive". I've obviously read this before today
- 7 because I've seen it in the disclosure documents but
- 8 I don't know what that's referring to.
- 9 Q. No. So, again, perhaps some issues going on behind the
  scenes that the Board were being kept in the dark about.
  11 You're nodding --
- 12 **A.** Yes.
- 13 Q. -- just for the transcript.
- 14 A. Sorry, yes. I am nodding. I agree.
- 15 **Q.** Can list just have a look at this email, UKGI00045624.
- 16 If we scroll down a bit, the email that we can perhaps
- 17 look at is between Richard Callard and Tom Cooper in
- 18 2020, so considerably after the events we're looking at.
- 19 And, obviously, he's reporting back on a conversation he
- 20 had with you, and people no doubt have their own
- 21 slightly different recollections of conversations. So
- 22 you may wish to comment on various parts of this email.
- 23 But there are couple of these bullet points that
- 24 I wanted to focus upon. It's about the "whole Sparrow
- 25 thing", as Richard Callard puts it. The second bullet 130

1		I've read all the documents. So, at this point in 2020,
2		which would have been six years after I left, I'm not
3		sure how much reliance can be put on this.
4	Q.	In other words, are you saying that you don't believe
5		that you said that there was mischief making or
6		a populist cause?
7	Α.	I don't remember those words. So, honestly, it's hard
8		to say.
9	Q.	Do you think that there was any propensity on the Board
10		to be predisposed in that direction or was that
11		something the Board was being steered towards by the
12		Executive?
13	Α.	I think, from the beginning of our conversations as
14		a Board about what became the Second Sight Interim
15		Report, Alice was keenly aware, in the way she portrayed
16		it to us, that there was a whole series of issues that
17		had been going on for a long time, that understandably
18		James Arbuthnot was very worried about, as was Sir Alan
19		Bates. She wanted to get the work done, to look at it,
20		and that's what's happened. That's my recollection.
21	Q.	Well, can we look at the Second Sight relationship over
22		a slightly longer time frame and, in broad terms, in
23		2020 sorry, the email can come down unless there's
24		anything else you want to tell us about it while it's up
25		there?
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## rizon IT Inquiry

		The Post Office Hori
1	Α.	No.
2	Q.	No. In 2012, the CEO announced the Second Sight Review
3		to the Board as just a little bit of AOB, right; that is
4		the first the Board gets to hear about it?
5	Α.	Yeah, it was in the AOB part of the discussion, I don't
6		think it was just a little bit, I wouldn't use exactly
7		those words but I understand of course the point you're
8		making. It didn't come as a paper nor as a main agenda
9		item.
10	Q.	No history, nothing about past prosecutions. The
11		reasons that lay behind why Second Sight had been called
12		in, in effect, the fact that over many, many years,
13		people had been being prosecuted on the back of the
14		Horizon evidence and that, therefore, there were
15		multiple complaints to MPs about those prosecutions.
16		That wasn't part of the history that you heard about?
17	Α.	At that May 2012 Board meeting, no, it was nothing like
18		the horrific extent of what I now understand. It was
19	Q.	Or even what was understood at the time, in the sense
20		that a number of MPs had made complaints, a number of
21		newspaper articles had been written. There was

- 21 newspaper articles had been written. There was 22 a growing groundswell of people complaining about
- 23 Horizon that required this to happen. That wasn't made
- clear, was it? 24
- 25 Α. No, not in the May 2012 "Any Other Business" discussion, 133
- 1 Α. We did not, and the next sort of thing we got, which is
- 2 why, as I've discussed, there was irritation, there was 3 this 1 July --
- 4 Q. Exactly, when you were blindsided?
- 5 A. Yeah.
- 6 Q. So then even though you had asked in May for a proper
- 7 update, you then get nothing until you're blindsided and
- 8 told there is an urgent need to deal with the report 9
- that's about to be presented to Parliament. So, in 10 effect, over that whole first year, the Board is not
- 11 substantively updated on the work of Second Sight and,
- 12 indeed, the agenda is managed in a way that everything
- 13 about it is put sort of below the line, everything in
- 14 the papers at least is put below the line just for 15 noting, nothing for a proper discussion?
- A. Yeah, that's right. I mean, I know now from the papers 16
- 17 I've read that there was guite a lot of to and fro
- 18 between the company and Second Sight in the months that
- 19 led up to the publication of the Interim Report but we
- were really getting very little colour on that, and as 20
- 21 you say, the written papers that we were receiving were
- 22 more as a sort of risk update, they're positioned as
- 23 there are these situations but not presented to us in
- 24 the way that we then came to understand them.
- Then we get to the July 2013 Board and, in the 25 Q. 135

- 1 no. 2 Q. No. So then, following that, each month the Chair draws 3 up the agenda and she puts the Significant Litigation 4 Report below the line just for noting, not for discussion, month after month and, at the point where 5 6 there's Second Sight included as part of that, there's 7 kind of a couple of lines on Second Sight in those 8 Significant Litigation Reports but not for discussion? A. The -- yes, I mean, you're right. The May 2012 Board 9 10 meeting was when Alice and Paula reported their meetings 11 to us with James Arbuthnot and then the Second Sight work started, as well as the Significant Litigation 12 13 Reports, which were in the papers every month and 14 expanded over time in terms of their content. 15 There were, from time to time, updates, for example 16 if one of Alice Perkins or Paula Vennells had met Lord 17 Arbuthnot or Sir Alan Bates, they might update on that, 18 and I think, from time to time, the Board said, "What 19 happened on that work?" So there was a bit of to and 20 fro but nothing like the volume and focus, as you'll see 21 from the 1 July 2013 until I left the Board in 2014. 22 Q. Indeed, in May 2013, the Board did actually ask for 23 a formal update --24 That's right. Α. 25 Q. -- which you did not receive? 134 1 background to just a few more questions -- and I don't 2 have many more -- it's just worth bearing in mind this: 3 that they are -- the July Board is a missed opportunity 4 arising from the fact that Ms Crichton was not 5 presenting her own paper, because she had received the 6 Clarke Advice. 7 Α. (The witness nodded) 8 Q. She knew much more than the Board did about past and 9 present prosecutions. 10 A. (The witness nodded) 11 Q. The fact that she did not present her paper and become 12 subject to questions from the Board means that her 13 knowledge of the Clarke Advice stood no chance of being 14 revealed to the Board? 15 A. (The witness nodded) Q. Ms Perkins gave an account to this Inquiry about why 16 17 Ms Crichton didn't come in to Board to present her 18 paper. At the end of that, Mr Beer asked her "Why is 19
  - none of that reflected in the Board minutes?", and after
- 20 a few false starts, her answer was, "I don't know the
- 21 answer to that question".

22 Was it your experience of the minute taking at POL 23 that important discussions were not reflected in the 24 minutes?

25 **A**. My recollection was that Alwen Lyons was a diligent 136

1	company secretary. The nature of minutes from any Board	1	
2	meeting, and frankly any other meeting, often doesn't	2	
3	give the reader all of the to and fro and who said what,	3	
4	and might not include somebody having been expected to	4	
5	present a paper and then not. So I don't think that in	5	
6	itself was unusual. I obviously appreciate how	6	
7	frustrating it is now and, you know, for me now as	7	
8	a reader, trying to jog my memory, of course I think we	8	
9	all wish there was a lot more colour on this issue	9	
10	but	10	Q
11	Q. No, of course minutes don't reflect everything but would	11	
12	you have experienced a case where there's a discussion	12	A
13	about something significant and it just doesn't appear	13	
14	in the minutes?	14	
15	A. Um I mean, I can't think of examples of that now,	15	
16	looking back. If we were contemporaneous, I'm sure it	16	
17	would be much easier to give you an example about that.	17	
18	SIR WYN WILLIAMS: Nothing about it sticks in your mind?	18	
19	<b>A.</b> No, no.	19	
20	SIR WYN WILLIAMS: All right. Is that it Ms Page?	20	Q
21	MS PAGE: Just very briefly if I may, sir in your time	21	A
22	on the Board, was Ms Perkins somebody you would have	22	
23	found or did you find her to be capable of leading and	23	Q
24	controlling Board discussions?	24	A
25	A. Alice had a lot of experience of Board interfaces	25	Q
	137		
1	Me Derking estually less control of what was being said	1	
1 2	Ms Perkins actually lose control of what was being said in the meeting?	1 2	
2	A. I don't recall that. She is quite a calm person.	2	
4	I don't recall that.	4	
4 5	MS PAGE: No. Thank you, sir.	4 5	
6	SIR WYN WILLIAMS: Mr Stein?	5 6	
7	Questioned by MR STEIN	7	
8	MR STEIN: Sir, tempted as I am to say I've got a clear	8	
o 9	hour, I'll be about 15 minutes	o 9	
9 10	SIR WYN WILLIAMS: Tempted as I would have to say: no, you	9 10	
11	haven't.	10	
12	MR STEIN: I think about 15 minutes, if that suits both the	11	
13	panel and yes, it does, I'm very grateful. Thank	12	
14	You.	13	
15	SIR WYN WILLIAMS: Well, I'll be rigorous, Ms Page, and hold	14	
16	Mr Stein to 15 minutes, so I'll look at Mr Page's watch	16	
17	now.	10	
18	MR STEIN: The time is on, Ms Storey.	18	
19	Ms Storey, I represent a large group of	10	
20	subpostmasters, also people working in branches at the	20	
20		20	
21	small branches that you're familiar with right up and down the country.	21	
22	Can I just take you to two passages in your	22	
23 24	statement to start off with, please. They're parts of	23 24	
24 25	the statement whereby you refer to being reassured about	24 25	
20	139	20	

	really very seriously, she was very committed to it and,
	I think, wanted to make sure there was a good discussion
	of all of the issues across these difficult areas.
	I think, if people felt strongly about things, they
	would say them anyway. She probably was quite good at
	sometimes drawing a conversation to a close or asking us
	to pick it up offline. So I think she was rigorous.
Q.	Would you have said that the July board "kicked off" in
	any way?
Α.	"Kicked off" is not a sort of expression I would
	particularly use but, I mean, as we've discussed today
	and as I think the minutes reflect, it was
	an uncomfortable Board and we had a difficult discussion
	before the Board, just the NEDs who were there Neil
	was not there that day, but for the NEDs and the
	Chair the board meeting was difficult. "Kicked off"
	-
~	slightly implies uncontrollable. I wouldn't say that.
Q.	It wasn't uncontrollable; it was controlled, in effect?
Α.	Controlled in the sense of orderly. I don't mean
_	controlled to my memory in the sense of
Q.	Steered? No
Α.	Yeah.
Q.	not steered but, in the sense that at no stage did
	138
	the system, the Horizon system. So paragraph page 17,
	and I'm going to go page 8 of your statement, so I'd
	like it on the screen, please. So paragraph 17 but it's
	actually page 8 of the statement and it's the last,
	I suppose, few lines of that paragraph.
	So if we go to page 8, and we look at that top
	paragraph, I'm very grateful. That's ideal, thank you
	very much. So if you look above paragraph 18, the bit
	I'm after is just above there.
	What you're talking about there is that you're
	talking about POL had full confidence in the Horizon
	system, the system had been vigorously tested, full
	confidence in the accuracy and robustness of the system
	was shared by the NFSP:
	"As I explain below, this was the consistent
	position adopted by the company in relation to Horizon

because part of her day job was coaching people and coaching boards and my experience was she took this role

full confidence in the accuracy and robustness of the system and I do not recall hearing or reading anything

Paragraph 21, at page 10 now, please, and the last

"I referred above to the POL statement circulated November 2011 [then a Relatively reference] expressing

4 that was inconsistent with those assertions."

throughout my tenure on the Board."

So we can see from your statement that on two 140

few lines of paragraph 21. So very similar there.

3

4 5 6

7

8 9

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19

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24

1		occasions you were referring to what you understood the		
2		position to be, having been informed by the Post Office		
3		that the system works fine.		
4	Α.	Yes.		
5	Q.	Now, we then get, in terms of the order of things, we		
6		get a reference within your statement to another		
7		document I'd like to refer to, please, which is an SLR.		
8		I'll ask this to go on the screen, please, UKGI00018251.		
9		Now, this may appear as a slightly faded document on the		
10		copy we're about to look at but we'll make our way		
11		through it.		
12		Yes. On my screen it's quite small, if that could		
13		be expanded slightly I would be very grateful, if that's		
14		possible. If we work our way down, so if we hold it		
15		there for a second. So the SLR is referring, as you can		
16		see there, to the right-hand side as "Privileged and		
17		Confidential claims over 500,000 or those of		
18		a sensitive nature".		
19		If we look at file name "Horizon claims", and then		
20		reference to case holder, we then see a name that is		
21		very familiar to this Inquiry, Rod Ismay of POL. Now		
22		the significance of Mr Ismay to the Inquiry, you've been		
23	•	following the Inquiry clearly		
24 25	A.	have.		
25	Q.	he wrote what within the Inquiry is called the 141		
4				
1		Shoosmiths, and then an update as to the position.		
2		Okay.		
2 3		Okay. So we see that there are Shoosmiths setting out the		
2 3 4		Okay. So we see that there are Shoosmiths setting out the fact that they've got 85 clients, plus the then five		
2 3 4 5		Okay. So we see that there are Shoosmiths setting out the fact that they've got 85 clients, plus the then five that are here, all setting out this is the summary of		
2 3 4 5 6		Okay. So we see that there are Shoosmiths setting out the fact that they've got 85 clients, plus the then five that are here, all setting out this is the summary of the situation which is they're all saying there are		
2 3 4 5 6 7		Okay. So we see that there are Shoosmiths setting out the fact that they've got 85 clients, plus the then five that are here, all setting out this is the summary of the situation which is they're all saying there are problems within the system.		
2 3 4 5 6 7 8		Okay. So we see that there are Shoosmiths setting out the fact that they've got 85 clients, plus the then five that are here, all setting out this is the summary of the situation which is they're all saying there are problems within the system. Now, you referred to this document at paragraph 66		
2 3 4 5 6 7 8 9		Okay. So we see that there are Shoosmiths setting out the fact that they've got 85 clients, plus the then five that are here, all setting out this is the summary of the situation which is they're all saying there are problems within the system. Now, you referred to this document at paragraph 66 of your statement. That's at page 32, paragraph 66.		
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2 3 4 5 6 7 8 9 10 11		Okay. So we see that there are Shoosmiths setting out the fact that they've got 85 clients, plus the then five that are here, all setting out this is the summary of the situation which is they're all saying there are problems within the system. Now, you referred to this document at paragraph 66 of your statement. That's at page 32, paragraph 66. I want you to help us with what you mean by some of the terms that you're using. So if we can now go to		
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2 3 4 5 6 7 8 9 10 11 12 13 14 15 16		Okay. So we see that there are Shoosmiths setting out the fact that they've got 85 clients, plus the then five that are here, all setting out this is the summary of the situation which is they're all saying there are problems within the system. Now, you referred to this document at paragraph 66 of your statement. That's at page 32, paragraph 66. I want you to help us with what you mean by some of the terms that you're using. So if we can now go to paragraph 66, page 32 of your statement. So this is sent to you, this document. You refer to this as being part of the Board pack for your first Board meeting. Now, it might be said that, as it's your		
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2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18		Okay. So we see that there are Shoosmiths setting out the fact that they've got 85 clients, plus the then five that are here, all setting out this is the summary of the situation which is they're all saying there are problems within the system. Now, you referred to this document at paragraph 66 of your statement. That's at page 32, paragraph 66. I want you to help us with what you mean by some of the terms that you're using. So if we can now go to paragraph 66, page 32 of your statement. So this is sent to you, this document. You refer to this as being part of the Board pack for your first Board meeting. Now, it might be said that, as it's your first Board meeting, you may have read the lot, rather than having the ability to sift, but let's see how we go:		
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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		Okay. So we see that there are Shoosmiths setting out the fact that they've got 85 clients, plus the then five that are here, all setting out this is the summary of the situation which is they're all saying there are problems within the system. Now, you referred to this document at paragraph 66 of your statement. That's at page 32, paragraph 66. I want you to help us with what you mean by some of the terms that you're using. So if we can now go to paragraph 66, page 32 of your statement. So this is sent to you, this document. You refer to this as being part of the Board pack for your first Board meeting. Now, it might be said that, as it's your first Board meeting, you may have read the lot, rather than having the ability to sift, but let's see how we go: "The SLR [the one we've just referred to] appears to have been included with the Board papers but 'below the line' and for noting (ie not for discussion by or at the Board). As I have explained, the Board papers would		
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23		Okay. So we see that there are Shoosmiths setting out the fact that they've got 85 clients, plus the then five that are here, all setting out this is the summary of the situation which is they're all saying there are problems within the system. Now, you referred to this document at paragraph 66 of your statement. That's at page 32, paragraph 66. I want you to help us with what you mean by some of the terms that you're using. So if we can now go to paragraph 66, page 32 of your statement. So this is sent to you, this document. You refer to this as being part of the Board pack for your first Board meeting. Now, it might be said that, as it's your first Board meeting, you may have read the lot, rather than having the ability to sift, but let's see how we go: "The SLR [the one we've just referred to] appears to have been included with the Board papers but 'below the line' and for noting (ie not for discussion by or at the Board). As I have explained, the Board papers would include papers that were intended to form the basis of		

	whitewash report 2010
Α.	Yeah.
Q.	saying essentially "No bugs here", okay?
Α.	Yeah, the Ismay Report that I think David Smith had
	asked him to produce.
Q.	Yes. If we then have a look at what is going on, we see
	a reference I know it's very faded and slightly hard
	to see.
Α.	It's okay, I can read it.

Q. Okay great. Look at the middle column under 11 "Description", we've got a reference to Shoosmiths, 12 under the fourth paragraph: 13 "Shoosmiths assert that they have consulted on 14 a further 85 cases which are all likely to raise similar legal issues." 15 16 If you go up above that one, the third one, if you

- 17 can do the yellow line trick above to the: "Each alleges wrongful termination of contract 18
  - (based upon (a) alleged defects in POL's internal
  - processes and (b) alleged defects with Horizon) ..."

21 Okay? Then we'll move across and again, names that 22 are familiar to this Inquiry. Mr Darlington, it's 23 talking about his position, the claim rejected "on the

basis that the SPMR admitted to and was convicted of

25	false accounting".	Then "Response", in relation to
		142

1		discussed."
2		Help us translate the corporate speak here, if you
3		don't mind. When you're saying, "Appears to have been
4		included within the Board papers but below the line and
5		for noting only, ie not for discussion by or at the
6		Board", what does that mean: "below the line", nobody
7		reads it at all or people are expected to read and raise
8		something if they think about it? Help us.
9	Α.	Yes, so what I mean by that is that the Board agenda
10		would set out each of the items that were going to be
11		discussed at the Board, each one would have a timetable
12		committed to it. That would basically take up the bulk
13		of the day, if a Board meeting went from 9.00 until
14		4.00. And then, just at the end of the day, in my
15		experience of the Post Office with these matters, there
16		were items that were not being raised to the Board for
17		discussion, but only to note, which means you needed to
18		read it and agree that you had noted it, and that was
19		the nature of these Significant Litigation Reports.
20	Q.	Shoosmiths is saying they've got 90 people all saying
21		that there are problems with the Horizon system. Was
22		that something that came to your attention in terms of
23		you thinking about it and saying, "Hang on, that's
24		a heck of a lot of people"? Did it come to your
25		attention in that way.
		144

Paragraph 2. I'm going to summarise this because I've got a clock ticking. Access Legal from Shoosmiths, national firm, contacted by 100 SPMs. So you see the same numbers. The numbers, in fact, are going up by this point. They suffered losses, those losses can't be

1	Α.	I don't recall it coming to my attention in that way at	1	
2		that Board meeting and, you know, that's one of the	2	
3		things obviously that I've said I regret. My reflection	3	
4		is and I understand why, you know, from your position	4	
5		this will sound odd but, in the shoes that I was in and	5	
6		as a Non-Executive Director Board member, we were	6	
7		getting quite strong assurances that the system is	7	
8		robust, nothing to see here. So I think I was trusting	8	
9		what the execs were saying. But I take your point.	9	
10	Q.	All right well let's keep on going, you're talking about	10	
11		shoes, I'm going to talk about Shoosmiths a bit more.	11	
12	Α.	Yes.	12	
13	Q.	POL00141382. Now, you go away on maternity leave	13	
14		I have this from your statement is it March 2012 to	14	
15		March 2013?	15	
16	Α.	No, I had the baby in March 2013, and I started on the	16	
17		Board in April sorry, in March 2012, and I started on	17	
18 19	~	the Board in April 2012.	18 19	
20	Q.	Right. Okay, maybe I've misnoted it from your statement. So I'm not sure whether you're around at the	19 20	
20		time of this particular document. We go to the end of	20	
21		the document, I think it's July 2012. But let's have	21	
22		look through. I want to go to particular paragraphs,	22	
24		paragraphs 2 to start off with, it's a very good summary	23	
25		of the situation.	25	
20		145	20	
1		ever gone missing. Then 12, again I will summarise:	1	
2		If the loss not repaid, POL will prosecute the SPM	2	
3		for false accounting and then people are being advised	3	
4		to plead guilty to false accounting. In the	4	
5		circumstances, many were charged with theft or fraud but	5	
6		these charges are typically dropped and SPMs have been	6	
7		imprisoned for false accounting.	7	
8		These are serious and quite complex issues that are	8	Α.
9		being raised. Lastly 14 and 16.	9	
10		14: the contract is old, this is what it is saying.	10	
11		It goes back to 1994. It was designed for a paper	11	
12		system, no good for a digital system. That's what 14 is	12	Q.
13		saying.	13	Α.
14		Then 16, just finishing. Faults with Horizon, loads	14	
15		of ways, this is saying, there could have been problems	15	
16		with Horizon: system errors, human errors, faults with	16	Q.
17		cross-system communications, electrical faults. It	17	Α.
18		doesn't matter, it goes on to say, how they're	18	
19		occurring, it's happening.	19	
20		So you've got complicated detailed submissions being	20	
21		made by Shoosmiths in relation to the Network	21	
22		Transformation consultation. That's what's going on	22	
23		here	23	Q.
24	Α.	Yes.	24	
25	Q.	saying look there are real problems, lots of people	25	

	this point. They suffered losses, those losses can the
	explained. They had been subject to disciplinary
	measures, all adamant that they or their staff have not
	stolen any money. Horizon system is at fault, they say,
	the Post Office requires them to use it. The last three
	lines:
	"They claim there has been no real investigation by
	POL as to the clause of the losses that have appeared
	SPMs are expected to pay it back regardless of how it
	was caused."
	Can we go back to paragraphs 11 and 12 together.
	They appear, I think, close to each other.
	Paragraph 11:
	"POL will ask an SPM to repay all losses"
	I've used this document before in another context so
	I'm just going to go to a slightly different part to
	assist the Inquiry. Last line of paragraph 11 says:
	"It is far from clear whether there is a loss in
	a sub post office that POL have actually lost any
	money."
	So it's far from clear as to whether any money has
	146
	we've got all having difficulties in the same way.
	Now, first question, it relates to this: if I'm
	right in thinking about the timing of when you were
	away, was this brought to your attention, if I've got
	the timing right, when you came back from maternity
	leave or at you in any way familiar with this document
	at the time at the time?
•	So just firstly, I never was away on my maternity leave.
	So I had the baby and then started on the Board. So
	I was on the Board when I was on my maternity leave
	<i>(unclear simultaneous speakers)</i> doesn't matter.
	Are you familiar with this document?
	This document I am now, it's a written submission, as
	you're saying, to the Department of Business Select
	Committee.
	Correct.
-	
•	The hearing was in May 2012 and it was on Network
	Transformation. Shoosmiths made the submission, it was
	a written submission, it's in the papers, and Paula
	Vennells appeared at that hearing, it's the one that
	I was referring to earlier. She appeared on 15 May
	and
	At the time of these sorts of matters, around this
	period of time, forgive me for summarising your
	position
	148

1 <b>A</b>		Yes, sorry	1		MP asked one question which George Thomson took bu
2 <b>Q</b>	<b>).</b> ·	were you familiar with what was going long in these	2		wasn't even referred to in the committee's
3	:	submissions? Was it	3	Q	. No, we have a slight problem with Parliamentary
4 <b>A</b>		I had not seen this submission, no, no. But the point	4		privilege, so therefore
5		I was making before was, when we were given the update,	5	S	IR WYN WILLIAMS: Anyway, just on this, can I just be
6	i	for example, at the Board on the BEIS Select Committee	6		clear, there was no attempt by the Post Office
7	i	that the Chief Executive had just appeared at, this	7		Executives to bring this sort of detail however it
8		particular submission wasn't referenced and it actually	8		came into being, there'd been no attempt to bring this
9	,	would have been extremely important to see it at the	9		sort of detail to the Board?
10	i	time.	10	Α	. No.
11 <b>Q</b>	<b>)</b> .	Because one of the simple ways through this would have	11	S	IR WYN WILLIAMS: Right.
12		been for somebody on the Board, or Ms Vennells,	12	Μ	<b>R STEIN:</b> We then get through and you have been aske
13	:	somebody, to start speaking to the subpostmasters	13		a lot of questions about it by Mr Blake and some of them
14		because rapidly what would have happened is that would	14		have been looked at them afterwards. So just to finish,
15		have resulted in being told "Look every time we phone up	15		you get to the stage whereby you read and you're aware
16	t	the damn helpline they just tell us to pay because of	16		of the contents of the Second Sight Interim Report.
17	i	the contracts".	17	Α	. Yes.
18 <b>A</b>		I appreciate that	18	Q	. Okay. Now, we don't need to go to it but one of the
19 <b>Q</b>	<b>)</b> . '	That's masking people masking complaints about the	19		most significant things about that report is saying that
20	:	system, "they keep on telling us to pay and I'm trying	20		there's bugs in the system, a couple of bugs
21	t	to say look there's a problem".	21	Α	. (The witness nodded)
22 <b>A</b>		I appreciate that and	22	Q	one which is the mismatch bug
23 <b>Q</b>	<b>)</b> .	If that had been looked into?	23	Α	. (The witness nodded)
24 <b>A</b>		Yes, and also the Parliamentary Committee didn't pick up	24	Q	could really cause problems to people. Okay? So
25	I	this issue I think in the hearing Caroline Dinenage 149	25		let's go back to where I started with my questions. 150
1		You're being told: system robust, no bugs, no problems	1		system and yet, in 2013, you're told about bugs that
2	,	with it. Then later on, 2.13, you're told that there	2		well affect branch accounts. Did you ever get or was
3	;	are bugs.	3		there any discussion at the Board "Why on earth are we
4 <b>A</b>		(The witness nodded)	4		being told that there were no bugs in the system? Who
5 <b>Q</b>	<b>)</b> .	Right. Did Ms Vennells, at this juncture, when you get	5		been making this up? What's going on?" Did you ever
6	t	the Second Sight Report and the discussions at the Board	6		get to that because, as an example, Mr Ismay, who
7	;	about it, did she say to the Board, or you individually,	7		I referred to right at the beginning, he learnt in 2011
8		"One of the things that's really peculiar about this is	8		about the mismatch bug.
9		that I've been reassured, reassured and reassured there	9		So it's been going on for years, the Post Office has
10		are no bugs in the system, and then, quite surprisingly,	10		known about these things.
11		or perhaps using other words, I've now learnt through	11	Α	•
12		Second Sight and details before that there are bugs in	12		although obviously I know that when I started on that
13		the system, and we really ought to look into this as to	13		Board we had none of the long history from the Royal
14		why we weren't told about this before".	14		Mail Group, we were not getting any concerns flagged b
15		Did she ever say something like that because I might	15		internal or any material concerns from internal or
16	ł	feel a bit misled in that situation, if I were in her	16		external audit.
17		shoes.	17		To your point, when it came to the Second Sight
18 <b>A</b>		No, she	18		Interim Report, it did flag those issues from the spot
19 <b>Q</b>		Right.	19		reviews very clearly. It also said there were no
20 A		Not in	20		systemic issues. It also flagged some serious concerns
21 Q		What about you and the other people on the Board?	20		that we needed to look at and, at the time in 2013,
21 <b>u</b> 22		You're in a similar position. You agreed with Ms Page	21		those were the steps that we thought we were taking.
23		and Mr Blake that you feel as though the Board was left	22	0	. Forgive me for interrupting, as again I'm slightly
		in a bit of a vacuum on information. But the one thing	23 24	9	thinking about the seconds ticking
24					
24 25		that you've been told at the beginning is no bugs in the	24 25	•	IR WYN WILLIAMS: They've ticked but carry on, yes.

1

1	MR STEIN: They've well ticked but did you think to yourself
2	or did the Board think to itself, "Well, hang on we
3	ought to look into why we've been reassured about
4	something that ain't true"?
5	A. Well, I think at the time, we did have various elements
6	of discontent that we expressed to the Executive and
7	then we set about a series of actions that we felt we
8	could control, to try to get to the bottom of these
9	things.
10	Q. And that one?
11	SIR WYN WILLIAMS: Well, I think the answer to the question
12	is that you didn't enquire, as Mr Stein suggested you
13	should. What you did, by the look of it, is to accept
14 15	the explanation you were given, namely there had been
15 16	two bugs but they'd been cured. That's what happened,
16 17	isn't it?
	A. Yeah, I think we took what the the Executive were
18 10	clear about their view. At that point in July 2013, we
19 20	had no particular basis to think anything different and
20 21	then we started to take a series of steps and then, as
	I said earlier to Mr Blake, part of the point from my
22	perspective of the Deloitte report was to try to get
23 24	under the skin of the IT MR STEIN: Outward facing from this, going into then the
24 25	question of it doesn't matter who is prosecuting,
25	153
1	disappear, as you prefer.
2	But for certain, I'd like to thank you for making
3	your witness statement, which is a very detailed one and
4	for answering questions for the greater part of today,
5	so thank you very much.
6	If you'd like to leave, now is your chance,
7	otherwise Mr Beer is going to start.
8	MR BEER: I won't take offence at all.
9	THE WITNESS: No, it's fine.
10	Announcements by MR BEER
11	MR BEER: Sir, as we've come to the end of phases 5 and 6
12	SIR WYN WILLIAMS: Well, is that true?
13	MR BEER: at least the principal part of the evidence
14	taking of Phases 5 and 6, I thought it might assist to
15	firstly draw the threads together in terms of the nature
16	and extent of the evidence that you've heard, secondly
17	to read some statements into the record, in fact, those
18	statements received in the course of these phases but
19	which relate to other phases of the Inquiry, Phases 2, 3
20	and 4, and then thirdly to say something quite short
21	about the independent surveys that are being conducted
22	for the purposes of Phase 7 of the Inquiry.
23	So, firstly, the evidence heard in Phases 5 and 6.
24	Over the course of 16 weeks, sir, you've heard
25	evidence from people at the highest level within the
	155

- whether it's the CPS in Northern Ireland, whether it's
- 2 the Procurator Fiscal in Scotland, whether it's Post
- 3 Office in England. We know that prosecutions continued.
- 4 I've referred to Ms Falcon who was prosecuted at the
- 5 beginning of 2015, using data from the Horizon system.
- 6 The prosecutions continued using Horizon data. Didn't
- 7 the Board say to itself, "Well, hang on, haven't we got
- 8 to make sure what on earth is going on with this. If
- 9 there are bugs in the system, like are being set out in
- 10 the report, we, the Board, have to be responsible for
- 11 making sure we stop it right now"?
- 12 A. Well, I can only speak to the Board until I stepped down13 in 2014.
- 14 SIR WYN WILLIAMS: Well, I think that's really a speech, not
- 15 a question. So I think we'll call it a day there,
- 16 Mr Stein.
- 17 MR STEIN: Thank you, sir.
- 18 SIR WYN WILLIAMS: Thank you.
- 19 MR BLAKE: Thank you, sir. Those are all the questions for20 Ms Storey.
- SIR WYN WILLIAMS: Right, we're not quite at the end of the
   session because Mr Beer wants to make one or two
- 23 announcements but that does conclude your evidence,
- 24 Ms Storey. So you're very welcome to sit there and
- 25 listen to Mr Beer for a couple of minutes, or you can 154

1	Post Office and Government paying careful attention to
2	the three questions which run through every stage of
3	this Inquiry: who knew what and when, about the issues
4	with Horizon. Since April of this year, you have heard
5	oral evidence from 66 witnesses. You will hear evidence
6	from a small number of witnesses on Phase 5 and 6 issues
7	in the course of Phase 7. Their evidence could not be
8	taken during the course of the last 16 weeks, for one
9	reason or another.
10	As in other phases of the Inquiry, the oral evidence
11	that you have heard is not the entirety of the evidence
12	that you will be considering. Aside from the huge
13	volume of documentary evidence, there are the statements
14	of witnesses who will be read into the record. I'm not
15	going to do that now for Phases 5 and 6, ie Phase 5 and
16	6 witnesses, and, instead, I'll do that in the course of
17	Phase 7, when all or nearly all of the Phase 5 and 6
18	written evidence is available to the Inquiry.
19	Owing to the scale of Phases 5 and 6, your Inquiry
20	Team will continue to seek evidence and issue Rule 9
21	requests throughout August, and further evidence will be
22	disclosed to Core Participants and then to the public in
23	due course.
24	Reading in of statements from Phases 2, 3 and 4.
25	Today the Inquiry will be publishing statements from 156

24

25

it?"

1	witnesses about Phase 2, 3 and 4 issues. Those	
2	statements will be admitted into evidence and treated as	
3	having been read into the record. The witness	
4	statements will be uploaded shortly to the Inquiry's	
5	website.	
6	The witnesses who fall into those categories are	
7	described in a PowerPoint presentation that I'd ask to	
8	be displayed. INQ00002022. If we look at page 2,	
9	please. The names of the witnesses that are going to be	
10	read into the record by the act of displaying this	
11	document are listed on the left-hand side for Phase 2.	
12	There are seven witnesses and eight statements because	
13	Mr Folkes has got two statements relating to Phase 2	
14	issues, and the URNs are displayed in the right-hand	
15	column.	
16	Over the page, please, to Phase 3. On this page and	
17	the next, there are 11 witnesses Mr Folkes being the	
18	first of them, his fourth witness statement who give	
19 20	evidence in relation to Phase 3 issues: names listed on	
20 21	the left; URNs, which I'm not going to read out, on the right.	
21 22	Over the page, please, that's the balance of the	
22	Phase 3 witnesses.	
23	Then the last page, please, there are four witnesses	
25	who give evidence about Phase 4 issues, names on the	
20	157	
1	Inquiry will be aware that you have commissioned	
1 2	Inquiry will be aware that you have commissioned independent research and data analytics from a firm	
2	independent research and data analytics from a firm	
	independent research and data analytics from a firm called YouGov, in particular to conduct two surveys to	
2 3 4	independent research and data analytics from a firm called YouGov, in particular to conduct two surveys to gather views from all current subpostmasters and all	
2 3	independent research and data analytics from a firm called YouGov, in particular to conduct two surveys to gather views from all current subpostmasters and all applicants to the Horizon Shortfall Scheme.	
2 3 4 5	independent research and data analytics from a firm called YouGov, in particular to conduct two surveys to gather views from all current subpostmasters and all	
2 3 4 5 6	independent research and data analytics from a firm called YouGov, in particular to conduct two surveys to gather views from all current subpostmasters and all applicants to the Horizon Shortfall Scheme. Those two surveys are ongoing. They're live at 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	<ul> <li>independent research and data analytics from a firm called YouGov, in particular to conduct two surveys to gather views from all current subpostmasters and all applicants to the Horizon Shortfall Scheme.</li> <li>Those two surveys are ongoing. They're live at the moment. By way of update to you and for others, I understand that, so far, over 2,000 recipients have either started to complete or have completed and returned the survey. We're surveying 16,000 people, so that is a response rate of around 12.5 per cent, which I am told is a promising start at this point of a research project.</li> <li>So, sir, that's all from me today. I would like to end by encouraging those, everyone who has received a link to the surveys, to complete them. It's vital from the Inquiry's perspective that we enter Phase 7 with as full a body of evidence about the current position as is possible.</li> <li>Thank you, sir.</li> <li>Statement by SIR WYN WILLIAMS</li> <li>SIR WYN WILLIAMS: Thank you, Mr Beer.</li> </ul>	

1	left, URNs on the right.
2	That can come down.
3	The work of your Inquiry so far has covered a period
4	of over 20 years. It has heard evidence through oral
5	witnesses from 267 individuals. We had published the
6	written evidence from a further 229, including those
7	listed on that PowerPoint presentation. Your Inquiry
8	has disclosed to Core Participants almost 250,000
9	documents totalling just under 2 million pages of
10	documents. I'm told, for those wishing to visualise
11	that number, if stacked up it would be the length of two
12	football pitches.
13	Can we turn, lastly, then to Phase 7 of the Inquiry.
14	As we move on to the final phase of oral evidence,
15	the Inquiry will turn its focus to the current practice
16	and the current procedures within the Post Office and
17	within Government, in relation to the Post Office.
18	Phase 7 will include evidence from current and former
19	senior officials and executives within the Post Office
20	and Government. We will also return to looking at the
21	effectiveness of the compensation schemes and the
22	redress schemes, building on your Interim Report
23	published last year.
24	Work on this phase has been going on in the
25	background for many months now. Those following the
	158
1	the appeal which Mr Beer has made for continued
2	participation in the two surveys. I am obviously
3	heartened by what he has had to say about the numbers of
4	participants to date but it is crucial that I get as
5	full a response as possible to these surveys because we
6	have looked long at the past, but now I'm coming up to
7	date, so to speak, and I want to know about the present,
8	both in terms of subpostmasters' reactions to the
9	present regime survey number 1 and postmasters'
10	reactions to the compensation scheme HSS in particular.
11	I think I am now brave enough to say that I have
12	stretched my terms of reference on compensation to, and
13	perhaps beyond, breaking point. It's something I am
14	very keen to say as much about as I reasonably can. So
14	I need as much help as possible from those who are
16	
10	claiming compensation in order to make proper
	conclusions about what has happened and whether it lives
18 10	up to the mantra of being full and fair.
19 20	I want to stress that the surveys are not connected
20	to the Post Office. I said that, I think, some weeks
21	ago when they were first introduced but I want to stress
22	that, because I can't help but think that there will be
23 24	lurking in some people's minds "Do we really want to get

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involved with this? Is the Post Office somehow behind

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1	The Post Office is not, this is for the benefit of
2	the Inquiry. So if you find it difficult to speak about
3	challenges which you still face, you people out there
4	whom I am addressing, please be assured that these
5	surveys are for the benefit of the Inquiry and therefore
6	ultimately for the benefit of me writing a sensible
7	report about the information they will contain.
8	Let me just say something about Phase 7. I think
9	in fact, I'm 95 per cent sure that this will begin in
10	the week commencing 23 September. There are significant
11	issues to examine. I don't want to rush it. So what
12	I expect is that hearings will run into November. Quite
13	how far into November we'll have to see because I have
14	decided that you all deserve a break in the middle of
15	this Phase 7, so that there won't be sittings in the
16	last week of October and the first week in November,
17	ie the potential half term weeks when people may want to
18	take a break.
19	A witness timetable for these sessions will be
20	published as soon as we can reasonably do that.
21	All that will be left after the Phase 7 evidence is
22	closing submissions and I want to tell you what I have
23	in mind, and I'm telling you this now so that if anybody
24	violently objects, they'll have a chance to register
25	their objection. What I want is that the substance of
	161
1	You've heard me praise my team up to the sky is the
2	limit, but all you and I'm looking past Mr Beer
3	because Mr Chapman hides in the corner there and I can
4	never see him but every CP in this room deserves
5	credit, together with their legal teams, for
6	facilitating my work.
7	So thank you all very much. I am going to retreat
8	back to Wales shortly and escape the heat of London but
9	I'll see you again in the autumn.
10	MR BEER: Thank you, sir.
11	SIR WYN WILLIAMS: Right. There we are.
12	(3.29 pm)
13	(The hearing adjourned until September 2024)
14	· · · · · ·
15	
16	

1	closing submissions are in writing. I do not want
2	anyone to get the impression that I am going to sit
3	here, or on screen, for a number of weeks listening to
4	oral submissions because I'm not.
5	What I will allow are reasonably short oral
6	submissions so that the advocates can demonstrate their
7	oratorical skills and treat me as I'm a jury in the Old
8	Bailey, even though I'm not, but it will allow there to
9	be some human impact to those oral submissions. So
10	I would expect that oral submissions will last for, say,
11	up to two days but the bulk of it has to be done in
12	writing, not least because that's the best way that
13	I can ultimately digest what is being said.
14	With a fair wind, all that will be completed for all
15	you to go off and enjoy your Christmas holidays, and for
16	me to think "Oh, my goodness, what comes next?"
17	Can I thank you all for participating as you have
18	done in this phase of the Inquiry.
19	Mr Beer, with his usual understatement, has reduced
20	66 witnesses and goodness knows how many documents he
21	mentioned, as if it was an everyday occurrence. With
22	the cooperation of all of you, we have got through
23	an enormous amount of work in a very short period of
24	time and, for that, I am eternally grateful for every
25	single person who participates in this Inquiry.

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