

Witness Name: Calum Brian
Greenhow

Statement No.: WITN00370100

Dated: 4th September 2024

POST OFFICE HORIZON IT INQUIRY

FIRST WITNESS STATEMENT OF Calum Brian Greenhow

I, Calum Brian Greenhow, will say as follows...

INTRODUCTION

1. I am a former Postmaster at West Linton Post Office, which I still own with my wife. I am currently the Chief Executive Officer of the National Federation of Subpostmasters (**NFSP**). I have been in this role since June 2018.
2. This witness statement is made to assist the Post Office Horizon IT Inquiry (the **Inquiry**) with the matters set out in the Rule 9 Request dated 23 July 2024 (the **Request**). I have had the advice of the NFSP's solicitors in preparing this witness statement.
3. I wish to thank the Chair, the Inquiry and the Inquiry team for all the work it has done and is continuing to do. The NFSP came into this Inquiry to engage with it as fully as possible and to assist the Inquiry in any way we could. I also wanted to find out more about what had taken place over the years, when and why, including about the NFSP's own role in it all. There is much that I have seen and heard at the Inquiry over the last two years that I did not know, including about the NFSP.

4. The Inquiry, its work and the recent push for full and proper financial redress is a testament to the tenacity, dignity, courage and determination of the victims of the Horizon scandal. I want to say at the outset that the NFSP acknowledges publicly that more could and should have been done by it to recognise that the issues being raised by Sir Alan Bates, in the media such as Computer Weekly, in documentaries such as Panorama needed to be taken seriously, and the Post Office line that Horizon was 'robust' should not have been accepted as often as it was or repeated as regularly as it was. I understand why former members of the NFSP felt let down by the responses they received at the time when seeking help from us or to raise questions about Horizon. On behalf of the NFSP and as the current Chief Executive Officer, I want to say that we are truly sorry for these failures of the past. I hope that in providing this witness statement, the information given will assist the Inquiry as to the work of the NFSP and its role. I also provide information in this witness statement on the NFSP's proposals for the future of the network, the Post Office and the bodies and organisations who represent the various employees and members.
5. By way of background to my own involvement in the Post Office network, my wife and I purchased our Post Office in West Linton in 1995 prior to our wedding the following year. As such, we have worked together our whole married life. With financial help from my parents, we were able to buy our business which hosts the local Post Office. This is not a decision I regret for a moment as the Post Office has enabled my wife and I to live in a wonderful community, in which we have brought up our two daughters. Having a contract with the Post Office has provided us with a home, as we live above

the Post Office, clothes on our backs and food on our kitchen table. As such, I have a lot to be thankful and grateful for.

6. I remember our Post Office being broken into overnight in August 2008. The break-in was not a pleasant experience. We turned to the NFSP for help, and I am grateful to those who supported us at that time. I recognise, however, that while this may be my experience, sadly the experience of members who were Horizon victims was very different. My hope is that the members and former members of the NFSP who became Horizon victims will be willing to accept my apologies.
7. In terms of the part postmasters play in their local community, we are no different from many others in their communities across the UK and those the Inquiry has heard about. My wife and I have spent the years since taking over the position of Postmaster and moving to the village of West Linton in various roles within the community. I've been treasurer of the local tourist group, a school governor at the local primary school, a Community Councillor, the Returning Officer for the Community Council, a Church Elder, a Retained Crew Manager at the local Fire Station. We've also helped organise the local fireworks display for the last 29 years and the village Christmas Lights. My wife was a leader in the Girl Guides at local, regional and national levels, receiving the Chief Guide medal in 2021. She is the current West Linton Citizen of the Year. Over the years we have supported micro businesses in the community by providing space within our shop and have been the drop-off point for local charities.
8. When my wife and I took over our Post Office in 1995, the Post Office operated what was known as the Appointment Abatement Scheme. This was

where they reclaimed 25% of the Postmaster's income within the first year. Post Office claimed it was to "reflect uncertainty and risk". To us it seemed arbitrary and unjustified. Fraser LJ mentioned this in his Common Issues judgement (**POL00113269**) at paragraph 78 where he stated: "*the rationale or economic justification for this is not entirely clear...*"

9. Sadly, due to the Network Transformation programme, which was established in 2012, we had to make the difficult decision in 2015 that we would not convert to the proposed Local model as it would not make financial sense. We have been part of what is known as the Hard to Place (**HtP**) since April 2018 as no Potential New Postmaster (**PNP**) has come forward to take on the post office. In February 2023, Post Office unilaterally changed the terms of the agreement in place since 2015 for 130 Postmasters and unless a PNP was in place by March 2025, these offices would be closed. The reason being is Post Office did not wish to go through the cost of installing the proposed Horizon replacement, known as NBit, and then to also take the HtP colleagues through the training process for it. Whilst initially a PNP came forward for our Post Office before the March 2024 cut-off, they pulled out in April this year. As such our Post Office is due to close on the 11th of October this year without any provision, at the time of writing this witness statement, being in place for the local community. There are around 30 other Postmasters who are in the same situation. This decision of the Post Office Board will result in an average loss to each of these 30 Postmasters of around £43,000.

BACKGROUND

10. I am asked to provide a summary of my career and qualifications prior

to joining the NFSP.

11. I left college with an National Certificate in Accounts and Information Studies.

I had several roles prior to taking over our Post Office in August 1995. These include working as a trainee assistant manager for H Samuel Jewellers, a fresh produce salesman for Caledonian Produce and as Sales Manager for Scotland for Gordon Fraser Cards, which was a division of Hallmark Cards. It was while I was working for Gordon Fraser that I met my wife. The Post Office in West Linton was one of my Gordon Fraser customers and as we had decided to run our own business, this fitted our needs.

12. I was also a Retained Fire Fighter for the Scottish Fire and Rescue Service (SFRS) from 2000 – 2017, retiring on the 31st of December 2017 as a Crew Manager. During my service for SFRS, I was an Emergency Fire Appliance Driver, a qualified Incident Commander and gained qualifications from the Institution of Occupational Safety and Health (IOSH).

13. In 2003 I began working part-time for a Solicitor & Estate Agent covering the Scottish Borders and Lothians. In order to add to my understanding of the industry, in 2004 I gained the Certificate in Mortgage Advice and Practice through the Chartered Institute of Insurers of Scotland.

14. I have always had a keen interest in the earth sciences and so in 2015 I began studying through the Open University for a degree in Earth Science. Given the time I had available, I studied one module per academic year, although becoming Chief Executive of the NFSP in 2018 meant that I had to abandon those studies. However, I was able to complete modules in Exploring Science (S104), Maths for Science (S151) and Communication Skills for Business and Management (LB170).

15. I am asked to describe the roles I held at the NFSP prior to my appointment as Chief Executive. Although I became a Postmaster in 1995, I did not become a member of the NFSP, which was a trade union at the time, until 2001. I am not a traditional trade unionist. However, there was continuous change going on in the network and I decided to join the NFSP. After two network reorganisations through Network Urban Reinvention in 2003 and Network Change in 2007, my wife and I believed that a third network reorganisation was most likely on its way. To protect our investment, we purchased our second Post Office in nearby Biggar in 2008. It was not until 2008 that I started attending meetings of what was the South of Scotland Branch of the NFSP and became more involved in the local branch. As part of the Network Transformation Programme we left the Biggar Post Office in 2013 when someone else took on that business.
16. Having become more involved in the local NFSP branch, in 2010 I was asked to stand for the role of President of the South of Scotland Branch of the NFSP. I was elected in 2010 and attended my first National Conference that year. In 2012 it was proposed that I stand for the position of Branch Secretary for the South of Scotland. After being elected for that, in 2013, I was elected by the Scotland Region to become the Scotland representative on the NFSP's Standing Orders Committee. This was the committee which, in traditional trade union terms, dealt with the motions from the branches which would go to the annual conference. In 2016 as the Regional Non-Executive Director was retiring, the Scotland Region asked me to stand for election to the Board of the NFSP as the Scotland Regional Non-Executive Director. After being elected, I attended my first Board meeting in June 2016.

Later, following the retirement of George Thomson, I was appointed as the CEO in June 2018. This is an employed position and not an elected position.

17. I am asked about the background to my appointment as Chief Executive and the responsibilities of that role. In early 2017 George Thomson approached me to say he would be stepping down as Chief Executive. At that time, he said he thought I had had shown an aptitude to take on the role. It was no secret in the Scottish Region that George and I had had public disagreements. In 2013 I had produced a paper that said Network Transformation was potentially not what it was being sold as and rather than sailing to a promised land it was a sea of icebergs. I was strongly criticised for taking that view. I previously had challenged him on the Articles of Association and Memorandum of Understanding as I felt these were a result of Network Transformation turning out not to be what it was said to be. I was surprised when he said he was going to stand down and hadn't even thought I would be someone he would consider. Others said to me it would be an opportunity to bring the NFSP back to the organisation it should be, bring it back together and be more inclusive, more representative of the members rather than what had become more of a toxic environment under George. It has been interesting to read the Post Office Group Executive Agenda and Associated Documents dated 14 September 2017 (**POL00027276**) and what is said by Post Office about my appointment. I note that Nick Beale said that Post Office had wanted someone from outside the postmaster community and not only had this view been shared with George Thomson, but it had been advocated by him. Also, that the decision of the NFSP to appoint me as the Chief Executive was "somewhat disappointing" and I came with

“unknowns”. None of which I knew, but it is of no surprise to me given my experience of how Post Office work as an organisation and their internal culture, and also shows George was saying one thing to me and something else to the Post Office.

18. From that initial mention by George, the possibility of the role was discussed with the then Chair of the NFSP, Jim Nott and the Negotiating Committee Facilitator, Ian Park who were supportive of me taking on the role before it was put to the full Board, who agreed.

19. I should say that I would not have taken the role without the full support of my wife and family. I therefore began the role in June 2018. As a result, this meant I stepped down as the Postmaster for West Linton on the 31st of May 2018 after 23 years of service to my community. My wife then became the Postmaster and still is today.

20. The role of Chief Executive of the NFSP is a dual role. There is the day-to-day management of a business with employees and there is the representative role. The NFSP is the representative body for self-employed Postmasters and to quote one of our founding fathers back in 1897, the NFSP seeks to work collaboratively and constructively with Post Office Ltd *“to improve the conditions under which Subpostmasters labour, and to undertake the advancement of our cause by all legitimate and honourable means”* (see NFSP Centenary book page 17, **WITN00370130**).

21. The role requires me to be the voice of Postmasters and those who operate their post offices. As such I regularly meet with politicians, Government officials, other external stakeholders and also those within Post Office.

22. Being involved in a network of over 11,500 Post Office outlets, brings its challenges and understandably, Postmasters look to me in relation to issues they have. I manage a small team who deal with such situations on behalf of Postmasters. Later in this witness statement I go into more detail as to how those issues present themselves.

THE NFSP'S ACTIVITIES

23. I am asked to provide a brief summary of the purpose(s) and activities of the NFSP.

24. The NFSP is the representative body of self-employed businesspeople who, as Postmasters, hold a contract for services to and on behalf of Post Office Ltd as their agents. As agents, these self-employed business people invest financially into the Post Office network by providing premises and staff etc to enable services of general public interest to be provided in their community. We negotiate rates of pay and conditions of service, we consult on conditions of service, opening hours, assist members with matters such as contractual disputes. We assist members who need help when shortfalls arise, although prosecutions are not what usually happens these days the Post Office may still seek recovery under the contract. When asked by our members to assist, we ask the Post Office to prove that it was not negligence, carelessness or error as those are the only ways in which a Postmaster is liable under the contract.

25. The aim of the NFSP is to ensure that the relationship that exists between Postmasters and Post Office is as collaborative and constructive as possible. As seen in the following documents, (the Subpostmaster Handbook 1995 at page 6 **NFSP00000899**; the Memorandum and Articles of Association of the

NFSP as revised 9 May 2021 at page 6 **NFSP00001051**; the NFSP Rules dated 2009 at page 1 **NFSP00001067**; and the NFSP Rules dated 2014 at page 1 **NFSP00001072**), throughout the years the objects of the NFSP has included regulating relations between Postmasters and Post Office, including by negotiating rates of pay and conditions, of service and variations of postmaster contracts on behalf of postmasters. Also participating in any form of consultation or negotiation relating to conditions of service for postmasters. Endeavouring to settle collective or individual disputes between members and Post Office and promoting such settlement through joint participation, conciliation or arbitration. This is not an easy goal to achieve as the relationship is seen by Government and Post Office Ltd as one of “parent to child”, with Post Office Ltd being dominant and Postmasters being subservient.

26. Over the last 25 years successive Government decisions have ultimately been detrimental to the viability of the network via Network Urban Reinvention (2003), Network Change (2007) and Network Transformation (2012). Each of those restructures reduced the viability of the network and Postmasters and therefore the security of the Postmasters investment as well as their ability to generate a return on their investment. The role of the NFSP during these times was to ensure the impact on the Postmaster was fully known by Government and Post Office and keep Postmasters as informed as possible and bringing their voice into any discussions with Government and Post Office.

27. The NFSP provides support to members in terms of on/off boarding i.e. leaving or joining the network, support with mail products, retail support, free

access to human resources services and holiday cover via HR4UK, insurance cover such as tax and VAT investigation insurance, personal ID theft cover, access to business legal advice (first 30mins free) and a Benevolent Fund.

28. The NFSP also supports its members via campaigns and awareness in matters relating to the network such as the recent DVLA campaign to prevent Government from removing the ability for DVLA services to be accessed over a Post Office counter (as discussed further later in this witness statement). We meet monthly with the Department of Business and Trade and also UKGI to discuss matters relating to the network. There are also three meetings per year with the Postal Affairs Minister of the day, again to discuss high level aspects of matters relating to Post Office and its network.

29. On a monthly basis, our Negotiating and Engagement Team meet with various departments and individuals within Post Office to discuss remuneration, performance and any other aspect that may affect the network.

30. We have and continue to develop our Advocacy Representative role. I recognised when I came into post that there wasn't a central register of issues or overall knowledge of what was going on, no training for anyone dealing with a postmaster where a discrepancy arose and felt that was wrong. I later heard that in the early part of the 2000s that was there, but not subsequently. I wanted to make this more professional and ensure that across branch secretaries there was a knowledge of issues that were going on. An Advocacy Representative is someone trained in Post Office contracts, such as the Mains Contract, the Local Contract etc. If a postmaster

has a suspension or potential termination then it is an Advocacy Representative who will represent them and they have been specifically trained to do that. Two of the Advocacy Representatives are NFSP employees and four are Postmasters from different regions. We advertised the role and said we were looking for people in these geographical areas. We therefore now have six trained representatives who have a knowledge of the different kinds of Postmaster contracts and also Post Office policies that impact Postmasters. The aim of this work is to ensure that there is consistency across Post Office Ltd when it comes to how Postmasters are treated in relation to any kind of contractual dispute. This has been one of a number of key changes in the representation of postmasters which has changed and developed from the Horizon Scandal time. The roles are evolving and developing on an ongoing basis. We are working with ACAS to find out if mediation training which they offer can also assist in the Advocacy Representative role. We are committed to making sure the Post Office is not the judge, jury and executioner in cases against Postmasters and that the right questions, the right evidence and the right steps are taken in the present.

31. I am asked to provide an overview of the organisational structure and funding structure of the NFSP. Where this changed over time, I am asked to provide details.

32. The National Federation of Subpostmasters was formed on Easter Monday 1897, where 90 Postmasters met in the Music Saloon, Wood Street, Wakefield. I have the NFSP Centenary book (**WITN00370130**) and I can see from page 17 that the reasons for the formation of the NFSP bear similar

hallmarks to the cultural attitudes the Inquiry is considering today. It reports that The Wakefield Express said on the 24th of April 1897 *“The reason for the general movement is the dissatisfaction felt as to the result of Lord Tweedmouth’s Committee on the Post Office Establishment, whereby the grievances of Subpostmasters were referred to the Postal Department, although, it is alleged, that Department has long known of their just claims, and has hitherto totally disregarded them.”*

33. The NFSP was a Trade Union until January 2014, when the Certification Officer made the ruling that the organisation as a representative body of self-employed individuals did not meet Section 1 of the Trade Union Act 1992. This is seen in the Letter (with enclosure) from David Taylor to G Thomson re: Trade Union and Labour Relations (Consolidation) Act 1992, Removal of Nation Federation of Sub-Postmasters from the list of trade unions (**NFSP00001464**). At the special conference in June 2015 (see Transcript of the NFSP Special Conference dated 18 - 19 June 2015, **NFSP00000957**) members at Branch, Regional and National level had mandated their representatives to vote on the proposals, which were a merger with either the CWU or the National Federation of Retail Newsagents (NFRN) or the Memorandum of Understanding/Grant Funding Agreement. I was there as a branch secretary for the South of Scotland branch and had been mandated by the branch members to vote for the Memorandum of Understanding. I personally did have questions about the MoU. That said, I was also not wanting to be part of a large trade union such as the CWU as I saw Postmasters such as myself as small businesses rather than being employees, and the MoU allowed the NFSP to remain as a stand-alone

organisation to represent its members, funded by Post Office Ltd under the Grant Framework Agreement (**NFSP00001075**) instead of by union subscriptions. Since September 2015, the NFSP has been a company limited by guarantee with no share capital (see Memorandum and Articles of Association of the NFSP, **NFSP00001051**).

34. Its structure today is that each member is associated to a Branch, with each Branch associated with a Region and with each Region having a Non-Executive Director to the Board. The Board members are therefore those who own and operate Post Offices. There are others who attend the Board but are not Board members. These include Operations Director, the Commercial Director, Public Affairs Manager, Communications Manager, Network Operations Officer/Negotiating & Engagement Facilitator and Compliance & Network Support Adviser. The non-Board members will provide updates on the network and other issues they are working on within their roles. I encourage the non-Board members to contribute to the meeting and for the meeting to have a more collaborative approach. I have sought to encourage team working in the organisation rather than the autocratic approach taken by the previous General Secretary/Chief Executive, George Thomson. The Chief Executive is delegated to manage the day-to-day running of the business and report to the Board of Directors. Earlier documents such as (the NFSP Rules 2009, **NFSP00001067**; the NFSP Rules 2014 **NFSP00001072**; the NFSP Organigram dated 2015, **NFSP00001086**; and the NFSP Organigram dated 2019 **NFSP00001094**) outline the previous structures prior to my time on the Board and later as Chief Executive. These show there were differences in names of roles, but

largely the language and structure is similar as the organisation changed over from a trade union to a trade association. For example, we don't talk about motions at conference but do have debates on key topics.

35. Until 2015/2016, the NFSP as a trade union was funded predominately by its members. That funding structure was before my time on the Board, therefore I cannot comment from a position of knowledge.

36. Today, most of the funds available come from the Post Office under the GFA with a small amount generated by some commercial activity. When we changed from a trade union to a trade association the members were automatically transferred over. Any new Postmasters coming into the network were written to, I think by the NFSP, to ask if they did not want to join the organisation. If nothing further was heard from them, then they would become members but under the GFA they did not pay subscriptions to the NFSP and the NFSP did not get any more money via the GFA as a result. Nowadays, the NFSP writes to new Postmasters asking if they want to join rather than if they don't want to join. I am not certain when this came in but it was before my time as Chief Executive.

37. The NFSP is made up of mostly volunteers from within the Postmaster community. The NFSP is divided into 53 Branches and 10 Regions. Each Branch has a Branch Secretary and Chair, who have a duty to engage and support members in that locality. Each Branch is connected to one of the 10 Regions, who have a Regional Chair, Secretary and Treasurer with the Branch Secretaries forming the remainder of the Regional Council. Each Region has a Non-Executive Director to represent the interests of all the members within that Region on the Board of Directors of the NFSP. All of

these positions are elected by the members.

38. I am asked to provide an overview of the methods the NFSP adopted to represent its members' interests between 2000 and 2019 (inclusive).

39. Issues in relation to which the NFSP represented its members' interests during this period include:

- a) Horizon introduction/roll-out back in 1999;
- b) Automated Credit Transfer which was the removal of the benefits books going electronic,
- c) the Post Office card account in 2003;
- d) Network Urban Reinvention in 2003 (this was an early closure programme which resulted in 3000 post offices closing);
- e) The Green Girocheques issue in 2005/2006 (further explained later in this witness statement);
- f) Post Office Card Account campaign in 2006 (to keep the card account, partially successful in the sense it was kept, the Benefits Agency increased their activity into the banks);
- g) Network Change in 2007 (where another 3000 post offices were closed. This was huge and dominated everything the NFSP was doing, the work then was to get the best possible deal for those who were having to leave the network and the way in which offices who were to remain open. Some wanted to stay open but were having to close and some who were to stay open wanted to close due to the compensation the NFSP negotiated);
- h) PostBank (was a proposal in 2009 for a bank owned by Post Office

as discussed later in this statement);

- i) Postal Services Bill in 2011, mutualisation and Network Transformation;
- j) the Trade Union Certification Officer 2013/2014 and the change from trade union to trade association leading to the GFA and the way in which the organisation could be kept going;
- k) 'White Space' in 2018 - this is about New Network Locations, which threatened to undermine the viability of neighbouring offices by opening a new Post Office within close proximity which Post Office knew about but the seller of the Post Office did not know;
- l) Hard to Place - ongoing since 2018 (those offices that have not transferred under Network Transformation are being closed down by March 2026, we are campaigning to get full and fair compensation for those members from the Post Office);
- m) DVLA campaign (to keep DVLA services over Post Office Counters as discussed further later in this witness statement);
- n) Simplification 1 and 2 (Post Office doing upgrades of the Horizon system which they stated made transactions quicker and so they would reduce the transaction fee paid to postmasters for that transaction/per transaction), Simplification 1 was introduced but 2 was scrapped.

40. The NFSP went about this by lobbying the Postal Affairs Minister (by meeting them, writing to them); discussions with MPs generally and other stakeholders, such as OFCOM and Citizens Advice; and trying to bring

others on board, e.g. Association of Convenience Stores. As an example, this is why the NFSP has a Public Affairs Manager (Ruth Buckley-Salmon) as the work with Parliament, MPs, Ministers is vital. There is the All-Party Political Group (APPG) which the NFSP was part of getting off the ground and regular meetings took place at Portcullis House. The benefit of the APPG was about informing parliamentarians of the plight of Postmasters investing in the network.

41. It is difficult to summarise all of the work done by the NFSP over two decades and the many different ways in which it has organised and run campaigns but this is my recollection of the key events from my perspective as a member, then branch official, then Board member and onto Chief Executive in 2018.
42. In June 2018, when I took over as Chief Executive, I reviewed the then practices, or lack thereof. When I became a Branch Secretary in 2012 there was no formal training provided to those who were supporting Postmasters where there was a contractual dispute with Post Office Ltd,
43. A Branch Secretary's Guide was produced in 2011 and I still have the copy I received in 2012 (**NFSP00001034**). In the foreword by the then President Kym Ledger, she states *"By accepting the role of Branch Secretary, you have undertaken one of the most valuable roles in the organisation. Members will seek your advice and guidance on a multiplicity of topics. To the majority of our members, you will be the face and voice of the Federation."* Contained within the guide were the roles at the time of President (Chair), Vice President, Membership Secretary, Assistant Secretary, Minute Secretary, Benevolent Fund Officer and Social Secretary. These individuals would

normally form the Branch or Regional Committee, which also included a Regional Treasurer.

44. As a minimum, there would be two Branch meetings per year and also two Regional meetings per year. One of those meetings would be an AGM to elect the Branch or Regional Officials. The Branch & Regional Secretaries, should work collaboratively and in conjunction with others covering areas where members raise issues. This could cover remuneration, holidays or sickness substitution, opening hours, complaints from customers or resignations due to the closure or transfer/sale of the office. Regional Non-Executive Directors are elected by the region on a 3 year cycle and are ex officio of the Regional Council. They can re-stand at the end of their 3 year cycle.
45. Guidance on how to deal with Reason to Urge (RTU's) interviews was also provided. The aim was to ensure the member received a fair hearing and achieve the best outcome for the member.
46. This Branch Secretaries Guide was updated and sent to all Non-Executive Directors, along with Branch and Regional Secretaries in May 2022 (see Branch Secretaries Guide final, **NFSP00001033**).
47. Listening to Postmasters during Branch or Regional meetings, there could be an inconsistency in the level of support provided. Added to this, there was no register of issues being kept centrally to have a fuller understanding or broader picture of issues that Postmasters in the network were experiencing.
48. With this in mind, I along with my colleague, Nilesh Joshi, the Non-Executive Director for London began working on what would become the Advocacy

Representative project where consistent training would be provided to Postmasters and a central record of all issues would be kept and analysed for patterns or anomalies.

49. Prior to 2019, the NFSP representative would have access only to the same information that the Postmaster could access. This was due to the Post Office having a bureaucratic, dictatorial and hierarchal culture inherent across the operational, tactical and strategic levels of the business. The NFSP as Postmasters are not seen any differently by Post Office as a whole. This has now improved with Postmasters and the NFSP, on behalf of the Postmaster, can have access to information that Post Office use to identify how the discrepancy arose. This is referred to later in this witness statement.

50. I am asked to summarise the nature and extent of the legal services that the NFSP would provide to its members between 2000 and 2019 (inclusive).

51. The NFSP does not have, and to my knowledge has not had, its own legal service, either inhouse or funded external solicitors to cover contractual disputes of the type which occurred during the Horizon period, such as criminal prosecutions and civil recovery actions for shortfalls.

52. The NFSP has a commercial arrangement with an organisation called Parliament Hill, which is a benefit management specialist. We pay a fee to them and they provide a range of benefits to our members, which include a free consultation with a law firm and this covers property law, personal accident and inheritance planning. The NFSP also has an insurance policy which allows members to access tax and VAT advice.

53. If the dispute is a contractual matter, for instance a complaint from a member of the public, or about opening hours, or an audit finds some procedural irregularities, the Postmaster can get in touch with the NFSP for assistance. This would involve the branch or regional secretary becoming involved to assist the Postmaster. However, where the issue is or becomes a criminal prosecution or involves civil court proceedings, that would be outside what the NFSP representatives could do and the member would have to obtain their own legal advice from a criminal or civil court solicitor.

54. Today we will work alongside the solicitors of any member involved in a contractual dispute of whatever type with Post Office to assist with as full a defence as possible.

55. I am asked to provide an overview of the types of Post Office employees, workers or contractors that the NFSP represented between 2000 and 2019 (inclusive), limited to those who used the Horizon IT System.

56. I can only comment from June 2018 with any certainty. The NFSP to my knowledge has provided representation to NFSP members and, when we were a trade union, Associate Members. An Associate Member could be a family member of the Postmaster. Employees of the Postmaster would not be members of the NFSP. For provisions regarding membership see Article 8.1 of the Articles of Association (**NFSP00001051**) and also previous NFSP Rules from 2009 **NFSP00001067**, and 2014 **NFSP00001072** which set this out also. As mentioned, as a membership organisation of those with their own businesses and, often, with employees, this is the reason the Certification Officer deemed the NFSP sat outside section 1 of the Trade

Union Act 1992. I am not aware of the NFSP ever supporting a Crown employee of Post Office as that is the exclusive remit of the CWU or, if a Manager, then likely the CMA (now Unite).

57. I am asked to provide an overview of the processes by which SPM's concerns and grievances were reported, recorded and monitored by the NFSP between 2000 and 2019 (inclusive). Where this changed over time, I am asked to provide details.

58. I cannot answer with any certainty prior to June 2018 but from my own experience as a Branch Secretary from 2012, it did not appear that there was a central recording facility. However, if a Postmaster had a concern or a grievance, they could come to their local Branch Secretary or Chair, their Regional official or their Executive Officer prior to September 2016 and Non-Executive Director from October 2016.

59. If they had a concern this could be raised at a Branch or Regional meetings or through the Standing Orders Committee which decided which motions should be included at the Annual Conference, as was the usual way of doing things in a trade union. This is seen in the Branch Secretary Guide 2012 (NFSP00001034) which sets out the way in which members would put forward motions, ask questions, debate and discuss matters at the annual conference. They were also able to write to the National President/National Chair who is the most senior representative of the members. The person in this role would change annually. They would bring matters raised with them to the Executive Council or Board of Directors.

60. As a result of participating in this Inquiry we have recognised a much greater and real need for the ability for members to raise concerns they may have

about the NFSP. With this in mind we have developed both a complaints and whistleblowing policy for members. These are being discussed by the Board on Monday 2nd September, and will be communicated to the members and provided to the Inquiry thereafter.

61. Although the branch system meant that often issues did not come up to HQ, in 2018 I began a system of collating issues which were coming up across branch and regional secretaries and analysing them for themes, patterns and anomalies. A report is then presented to the Board at each quarterly Board meeting. This is discussed further at paragraphs 265 – 266. The most recent of these reports is NFSP Public Affairs Manager Report to NFSP Board re issues affecting Postmasters March 2024 (**WITN00370109**). We would usually have had a report in June, however our Public Affairs Manager was not able to compile this due to the work she has been doing on this Inquiry. As described later, if any issue is identified it is taken to and discussed with the Post Office. We also have the 10 regional WhatsApp Groups and a Facebook page and we pick things up from there also. This process was not previously in place during the Horizon era and social media is now more to the fore. While social media has been very useful in hearing directly from Postmasters about issues they are having, it does come with some negative impacts when it is used to troll the organisation or its local representatives with occasions of personal abuse which has left some Postmasters unwilling or afraid to provide comments on issues.

KNOWLEDGE OF HORIZON

62. I am asked to describe the nature and extent of my knowledge of the integrity of the Horizon IT System from 2000 to 2019 (inclusive),

including (a) the existence of bugs, errors or defects and (b) the ability of Fujitsu staff to alter transaction data or data in branch accounts without the knowledge or consent of SPMs ('remote access').

63. I can't recall where or when I started to become aware of the issues being raised that Horizon was faulty. I can only say it is my recollection that it was getting towards 2015 before I become aware of issues around the Horizon system being faulty and the prosecutions based on it. I'm conscious that it probably sounds strange that I personally did not know of bugs, errors and defects during this time. I think this comes down to being a Postmaster in a small village, later becoming a local branch representative. In my own experience as a Postmaster in my Post Office and in the branch role, I didn't come into contact with anyone raising Horizon being faulty or the cause of losses as an issue. The issues I mainly heard about were the kind of things I've described as the NFSP being involved in. Although I can't recall just when this was something I did become more aware of, I can see that in emails with Helen Baker in around June 2015 I was saying that if over 150 MPs say there is a case for the Post Office to answer then it seems rather odd that the SLT (Senior Leadership Team) of the NFSP don't look into it (see Email from Calum Greenhow to Helen Baker re: ace up the sleeve, **NFSP00001460**). I can't recall where I got the information about 150 MPs, but it does seem that I knew of something that was being said by them. I think the first time I became aware of the nature of Horizon issues on losses and prosecutions was watching the Panorama programme in August 2015. When I watched the Panorama programme and saw Hughie Thomas, Jo Hamilton and Seema Misra, I just couldn't see them as people who had

stolen money. I saw the programme and then saw George Thomson's branch circular (see Branch Secretaries' Circular dated 18 August 2015, **(WITN00370126)**) and thought these things didn't add up and which resulted in me emailing him to question this (see Email chain from Angela Van-Den-Bogerd to Mark Davies RE: Panorama - Trouble at the Post Office, **POL00162628**). Although there is reference to bugs in the Second Sight Interim Report of 2013, I don't remember reading this report until later although I can't say when that was. I can see that George Thomson issued a branch circular on 27th August 2013 (Branch Secretaries Circular from George Thomson re press release and information pack, **NFSP00000976**) in which he encloses the press release and information pack issued by Post Office about the mediation scheme.

64. From what I can recall, I first became aware of the Fujitsu ability to access postmaster accounts on Horizon and alter data was when the GLO took place and the judgement was issued in December 2019. I was aware that remote access was something that was being spoken about, for instance, it was raised at the BEIS Select Committee in 2015 at which George Thomson and Andy Furey of the CWU appeared, but it was being denied by the Post Office and they consistently denied it and continued to deny it.

65. I remember that I had a call with Tim McCormack, a postmaster member of the CWU who had a post office in the South of Scotland Region in August 2016. He contacted me by email in August 2016 (see Emails between Calum Greenhow and Tim McCormack re Dalmellington dated 9 August 2016, **WITN00370129**) and through that I became aware of what is known as the Dalmellington bug.

66. In paragraph 448 of Fraser LJ's Horizon Issues Judgment (**UKGI00018137**), he states that between 2010 and 2015, 112 occurrences of the Dalmellington Bug, affecting 88 different branches, took place. I had no knowledge to the extent of the bug prior to Fraser LJ's ruling of 2019.

67. I am asked to what extent did I discuss the integrity of the Horizon IT System from 2000 to 2019 (inclusive), including (a) the existence of bugs, errors or defects and (b) remote access with others at the NFSP?

68. As has mentioned earlier in my statement, in 2015 after watching the Panorama programme, I wrote to George Thomson (see Email chain from Angela Van-Den-Bogerd, **POL00162628**), the then General Secretary of the NFSP highlighting my concerns. In the June of 2016 I joined the Board of the NFSP with Peter Montgomery, who also joined at the same time. Independently of each other, at the first Board meeting I attended, we each challenged the Board and especially George Thomson on the stance taken by the NFSP in relation to the integrity of Horizon (see NFSP report of a meeting of the Council on 13-15 June 2016, **NFSP00000500**), however I can see this was not recorded in the Minutes. I can remember saying the computer system cannot be 100% correct, a 100% of the time. I think George was repeating the no systemic issues line, but I was saying that did not mean it couldn't have local faults. George effectively shut it down and states, as seen in those Minutes, that we were 'reminded' of 'collective cabinet responsibility'. In raising this at the first Board, I was conscious that I wanted to try and build some momentum that could challenge George, I felt if I had gone at him all guns blazing he would have shut me down, as he had done others, and this would effectively prevent any challenge or change.

69. As I describe later in my witness statement at paragraph 99, I had a case involving a Postmaster who was having issues at their branch. At the reason to urge interview with this Postmaster, I challenged the Post Office Contracts Manager for Scotland, Brian Trotter, about the Dalmellington bug which Tim McCormack had told me of in earlier in 2016. Brian Trotter told me that the Dalmellington bug had been fixed, but did not elaborate as to when. He only said it was not connected to the case. I do not have minutes of this meeting.

70. I emailed Mervyn Jones in June 2015 primarily around the GFA but I was also raising concerns that although the Second Sight Interim Report indicated no systemic fault with Horizon, there was enough for the NFSP to be challenging the Post Office on how they were dealing with members (see Email from George Thomson to Mervyn Jones re: Yesterday's Branch Meeting, **NFSP00001465**). This email was brushed off. I did send Mervyn's reply and my email on to others who were at that time on the Standing Orders Committee so that they could see the issues I was raising.

71. I am asked to summarise any steps I or the NFSP took in order to develop a better understanding of the integrity of the Horizon IT System from 2000 to 2019 (inclusive), including (a) the existence of bugs, errors or defects and (b) remote access between 2000 and 2019.

72. I am asked what the NFSP did to better understand the issue of bugs, errors and defects. As I have mentioned, this was not something I had any real awareness of until around 2015. From looking back at records that the NFSP has supplied to the Inquiry which appears to relate to such queries, examples include:

a) National Executive Council Circulation with Memo from George

Thomson to Executive officer re Lee Castleton - Horizon (Lee Castleton case study), **NFSP00000888**; George Thomson asked Executive Officers to notify him of cases where the member believed Horizon was the problem and gave an undertaking he would raise the case with the Post Office at the highest level.

- b) Email from Martin Rolfe to Michael Rudkin others cc'd re: Bracknell Visit, **POL00021699**; this confirms Michael Rudkin did go to Bracknell as has been reported although it appears we don't have further details on this.
- c) Motions for conference as agreed at the Midland Regional Council meeting on February 2010, **NFSP00001037**; in preparation for Conference potential motions were discussed, including ones about Post Office retaining Horizon data on failures in software for a 12 month period, as they were doing it only for six months.
- d) Report on Motion, **NFSP00001044**; this shows NFSP members via motions at Conference trying to mandate the Executive Council to challenge Post Office on Horizon generated shortfalls.
- e) Horizon Next Generation Release Authorisation Board (Internal) Recommence Pilot Activities: Meeting no 10, Post Office (Internal RAB Meeting of 04 May 2010) **NFSP00000725**; there were a large number of outages and freezes relating to Horizon Online rollout which the NFSP repeatedly challenged Post Office about. Marilyn Stoddart was invited to join the Release Authorisation Board and as can be seen was asking about information on issues such as the live service log and recovery process.

- f) Letter to Dave Hulbert from Marilyn Stoddart re Semilong Post Office Mrs Jane Brewer, **NFSP00000806**; this is an example of the NFSP challenging the Post Office to carry out an investigation into shortages that may have been caused by Horizon.
- g) Email chain from Marilyn Stoddart to Andrew Craddock, Keith Richards re workshop agenda for Bracknell 22 Jan, **NFSP00000671** and Email from Dave Hulbert to Marilyn Stoddart Re: Issues around the recovery process following Horizon outage, **NFSP00001332**); there had been frequent outages and freezes, the NFSP identified an issue with the recovery process and what the helpline was telling Postmasters about this. Issues with the recovery process was causing shortages, in that if it was not dealt with correctly transactions would not go through properly, causing an issue with the accounts. The NFSP escalated this issue to Post Office which culminated in an NFSP visit to Bracknell on 22 Jan 2013, in which Fujitsu were to explain to the NFSP why recovery happens and hints and tips for successful recovery.
- h) Agenda and Briefing for Paula Vennell's meeting with George Thomson on 13 March 2013, **POL00142870**; this agenda shows concerns about Horizon reliability and outages and capacity to handle peak volume periods.

73. Earlier in this witness statement I have set out steps I took to try to understand these issues of bugs, errors and defects, including my email to George Thomson after the Panorama programme (**POL00162628**), although I can't remember now if the programme specifically mentioned bugs, errors

and defects. Once I took over the role of Chief Executive in June 2018 and in relation to the steps I took to develop a better understanding, I met with Andy Furey, Assistant Secretary of the CWU in October 2018 during which Horizon was discussed and I refer to that later in this witness statement at paragraph 131. I met with Lord Arbuthnot in July 2019 to try and understand more of the background to the GLO trial which had been taking place and I refer to that later in my witness statement at paragraph 141. When I came into post as Chief Executive, the trial date had been set and was happening a few months later. I felt it at that time the correct course was to allow the court process to take place to determine the extent of the Horizon issue and provide a ruling. As the NFSP was not a party in the proceedings, it was not until after Fraser LJ's Common Issues judgement in March 2019 that we began to understand the full extent of actions of Post Office over the years, which I discuss further later in this witness statement.

74. After the Common Issues judgement, the NFSP appointed Nilesh Joshi to the role of Legal & Regulatory. The purpose of this role was to collate and collect all members contract issues along with any anomalies or inconsistencies that show up. As mentioned earlier, a training programme would be developed to provide representatives of the NFSP the knowledge to support Postmasters at interviews held with Post Office.

POST OFFICE INVESTIGATIONS, CRIMINAL PROSECUTIONS AND CIVIL PROCEEDINGS

75. I am asked to summarise how I understood POL to conduct branch audits or investigations into alleged shortfalls in branch accounts whilst I have been a member of the NFSP. I am asked to summarise any

changes in practice I noticed.

76. There were two types of audit Post Office conducted, those routinely on a three-year cycle or those where a suspected cash shortage may be present.
77. As I never had an audit where a concerning shortfall was a factor, I cannot comment on this at a personal level. However, where the audit may be due to a suspected discrepancy, my understanding is that either a Postmaster would submit a Trading Period balance that showed a significant loss (I cannot state a minimum figure but I remember I was always concerned about the size of the losses prior to the Post Office doing an audit) or there would be a concern about the Overnight Cash Holdings (ONCH) in relation to the amount of cash that the office went through.
78. When an audit took place, it was unannounced. For us at our Post Office, there would be a knock on our flat door usually about 8am and two auditors would be present. We would take their ID and check with Post Office that they had authorisation to be present and then allow them access to the safe, where a check of our cash and stock against the Horizon derived figures would be conducted. If there was a slight discrepancy, it would be noted and then a discussion against Post Office processes would take place. This usually centered around security and whether we had the telephone number for Grapevine and the security manual to hand. A week or so later, a full report would arrive outlining the audit and any recommendations that were suggested.
79. Personally, I found the Auditors officious but diligent in doing their job. There was one occasion where I did take exception, and that was where they put a notice on our outside door stating that the Post Office was closed for financial

checks to be undertaken. I refused to allow them to put it up as I felt it suggested to the community that there may be financial irregularities behind the checks. The auditors agreed and carried on with their audit, which found no irregularities.

80. The only change I noticed was that the routine three-year cycle stopped and now you only receive a Branch Assurance visit, if there is a concern. Today, these visits tend to be announced in advanced.

81. If a Postmaster was short in their balance, there is a common acceptance that they are responsible for these discrepancies as per their contract, Section 12 of the SPSO contract (**NFSP00000761** or **POL00075132**) and clause 4 in the Mains & Local contracts (**POL00003870** and **POL00372920** respectively).

82. Whilst Postmasters took on the responsibility for the safe keeping of Post Office stock and cash, Post Office had a duty to provide a system that was fit for purpose and investigate any discrepancies fairly and thoroughly. Both of these sides of the contract should have been complied with "in good faith". However, I can see from documents provided by the NFSP to the Inquiry and from my own experience that the Post Office attitude to losses became harsher after the introduction of Horizon (see Open Debate resume losses audit suspension, **NFSP00001041**).

83. **I am asked to consider and comment on UKGI00025299 (Email from Tom Aldred to Beth White, William Wilson, Post Office Team and others re BEIS/NFSP/UKGI meeting 26/11/19 - read out), in particular the following extract from William Wilson's email dated 2 December 2019: "They (sic) key point for Calum is that, following an audit, there should**

be much more transparency when POL investigates claims. He finds POL ways of dealing with (potential) losses still rather cack-handed and not in good faith.”

84. This email was written prior to the Post Office providing and issuing internal policies that cover audits in which I go into more detail later in this witness statement at paragraphs 323 - 329. The email appears to be someone's interpretation of what I have said, I don't recognise the phrase 'cack-handed' as one I would use.

85. **I am asked to describe the nature and extent of any support the NFSP offered to SPMs in relation to (a) raising concerns about the Horizon IT System or related training and support services, (b) the conduct of branch audits, (c) investigations into alleged shortfalls in branch accounts, or (d) civil or criminal proceedings against SPMs arising from alleged shortfalls in branch accounts, between 2000 and 2019 (inclusive). I am asked how was that support organised by the NFSP.**

86. As I was not in a position of leadership for the majority of this period, I can only give my understanding as a Postmaster during the time period in question.

87. All Branch Secretaries, Regional Secretaries, Executive Officers or Non-Executive Directors of the NFSP along with the previous Assistant General Secretary and the General Secretary/Chief Executive would have been able to offer support to any Postmasters who raised concerns about a branch discrepancy, including when the Postmaster believed it was as a result of Horizon.

88. There is evidence of times where the NFSP were raising concerns to Post Office about the quality of training, for example in the National Federation of Subpostmasters Report of a Meeting of the National Executive Council on 15-17 June 2009, **NFSP00000511**, where the Council were trying to ensure that Postmasters were properly trained to minimise the risk of shortages; and in the Spreadsheet concerning terminals and Post Office Horizon software transactions (mails closed actions; branch support and compatibility report) - last updated was 12 February 2019, **NFSP00001352**, where there are entries under both open and closed Negotiating Committee actions detailing the NFSP challenging Post Office about the quality of training.

89. In 2000, the NFSP introduced training for Branch Secretary who would be involved in Reason to Urge (RTU) interviews, where a Postmaster was being questioned about an alleged shortfall (see NFSP Branch Secretaries' Training Representing Members RTUs and Appeals, **NFSP00000848**; and Publicity and Development Committee: Branch Secretaries Training reasons to urge and appeals interviews recruitment, **NFSP00000822**). It seems that training was discontinued at some point. As I have said earlier, it was not offered to me when I became a Branch Secretary in 2012. Guidance is available within the Branch Secretaries Guide, as discussed earlier in this statement.

90. Although before my time on the Board or as Chief Executive of the NFSP, from the evidence available to the Inquiry, I can see that before I became Chief Executive, a key concern that the NFSP had regarding the Horizon IT System, as reported to them by members, was the repeated and prolonged outages, and their effect on their businesses being able to operate. I can see

that the NFSP repeatedly challenged the Post Office regarding the outages and tried to obtain goodwill/compensation payments from the Post Office for Postmasters as a result of these concerns (see, for example, the entries regarding outages and goodwill payments in the Spreadsheet concerning terminals and Post Office Horizon software transactions, **NFSP00001352**).

91. I can see there is evidence which has been made available to the Inquiry of NFSP officials challenging shortages, asking for investigations into shortages which may have been caused by an issue with Horizon, and asking that the debt recovery process against Postmasters be blocked. For example, in the Email from David Milner to Anita Turner, Marilyn Stoddard, George Thomson and others - Re: National Savings Payment Advice, **NFSP00001291**, Dave Milner challenges the Post Office where a Post Office suffered a £4,000 shortage because Horizon had recognised a £2,000 withdrawal as a £2,000 deposit. He asks for confirmation that the business has addressed this issue, and for assurance that all payment advice transactions over this period will be investigated to ensure that no Postmaster suffered a shortage.

92. I can see there is another example where Marilyn Stoddart is asking for the Post Office to block the debt recovery process in relation to a shortfall caused by the recovery process failing, as seen in Email from Andrew Winn to Marilyn Stoddart and Branch Support Team re: Balance discrepancy, Queen's Ferry Post Office, **NFSP00001305**. As discussed earlier in this statement at paragraph 72(g), as Postmasters continued to have issues with the recovery process and inform the NFSP about these, I can see the NFSP later visited Fujitsu for an explanation of this issue (see Email chain from Marilyn Stoddart to Andrew Craddock, Keith Richards re workshop agenda

for Bracknell 22 Jan, **NFSP00000671**).

93. When it came to the Post Office deciding to prosecute and take the matter into the civil or criminal courts, as discussed in my witness statement, the NFSP did not have inhouse legal services or externally funded legal support for criminal prosecutions. This situation is the same or similar to other organisations, such as the CWU, and Tony Kearns of the CWU also referred to this situation when he gave his evidence to the Inquiry in June this year. This meant that members had to obtain their own solicitors for such cases. I know I have met with solicitors to answer any questions or guide them on how the Post Office and Horizon worked so that they could build as strong a defence as possible. I cannot state if in every case that the NFSP was contacted by the defence solicitor to request our assistance.

94. My understanding of the past is that the NFSP believed that the Postmaster had the right to choose whether they asked for the help of the NFSP, or whether they decided to deal with their case themselves. Our preference today would be that all Postmasters seek the help of the NFSP and that no Postmaster should suffer in silence.

95. When we were a Trade Union, we could only help those who were already a member. However, after we became a Trade Association, currently funded via the Grant Framework Agreement, any Postmaster, whether they were a member or not would receive the same support.

96. **I am asked to summarise my knowledge of or involvement with case(s) in which the NFSP provided support or representation to an SPM who was (a) accused of misconduct or incompetence in relation to a shortfall in a branch account and (b) the SPM could not explain the**

cause of the shortfall or alleged that it was caused by the Horizon IT System, between 2000 and 2019 inclusive.

97. There is a lack of a central record keeping process historically during the time period which means the NFSP does not have the evidence to show the extent of support that a Regional Official would have or did provide in individual cases. This is something we have sought to rectify via the central recording keeping of support provided at a Branch or Regional level. However, the NFSP has been able to provide evidence to the Inquiry that shows the NFSP helping Postmasters where a discrepancy was present. An example would be the issues at Semilong Post Office, as referred to previously. Here Marilyn Stoddart wrote the Post Office to request a full investigation as the result of significant shortages which may have been caused by the Horizon system (**NFSP00000806**).
98. During my time representing Postmasters as a Branch Secretary or Non-Executive Director for Scotland between 2012 -2018, I had only a small number of cases where there was a discrepancy at audit. As it happened, all but two of the Postmasters admitted to taking money.
99. I had a case where there was a Postmaster who had been in post only for a short period of time but was being questioned over a £39,000 discrepancy in their branch accounts. The Postmaster operated a core and outreach office, with Post Office suggesting that there was a misbalance between what cash and stock was being transferred between the core and outreach offices. The Postmaster was insisting that he was having trouble with the transferring of cash and stock due to the barcodes that were being used to transfer between the core and outreach offices. I challenged Post Office on whether it could be

the Dalmellington Bug, based on the information Tim McCormack provided (as discussed earlier in this statement), but was told that the bug was fixed prior to the events taking place so could not be involved. I continued to push the Contracts Manager during the meeting for information covering the period that the discrepancy was supposed to have occurred. However, the response I received was that as Post Office did not have the information themselves, they would have to request the information from Fujitsu which would incur a cost. My response was that given we are talking about the integrity of a Postmaster, cost should not be a factor.

100. On leaving the meeting, there were two action points. The first was for Post Office to retrieve the information requested from Fujitsu (which was never supplied). The second was for the Postmaster to write a letter to the Contracts Manager outlining the losses they had incurred along with the lack of training and support from Post Office they had received. I contacted the Postmaster having not heard anything from them for a few weeks to be told that the case was before John Breedon, Head of Postmaster Contracts. A few weeks later, I spoke with the Postmaster as Post Office was requesting further information from them. Unfortunately, in the December 2016 the Postmaster received a letter from the Contracts Manager terminating their contract but there had not been a criminal charge. I kept in contact with the Postmaster trying to support them afterwards but was not able to encourage Post Office to reconsider as there was no longer an appeals process. However, when Fraser LJ's ruling was handed down, I contacted the Postmaster to see how they were and let them know that there was a Historical Shortfall Scheme being set up. It was then that I discovered they

became part of the GLO and will hopefully, finally receive the financial redress they fully deserve.

RESPONDING TO THE EMERGING SCANDAL

101. **I am asked to consider:**
- a) **POL00041564 (Computer Weekly article dated 11 May 2009);**
 - b) **NFSP00000500 (NFSP council meeting minutes dated 13 - 15 June 2016);**
 - c) **POL00162628 (the email exchange dated 19 August 2015).**
102. **I am asked to describe when I first became aware of the creation of the Justice for Subpostmasters Alliance (“JFSA”) and the allegations made in the 11 May 2009 Computer Weekly Article.**
103. As per my email to George Thomson of August 2015 (**POL00162628**), I first became aware of a group of Postmasters, who I subsequently came to understand as Justice for SubPostmasters Alliance at my first Annual Conference in Torquay in May 2010.
104. I cannot state specifically when I became aware of the allegations made in the May 2009 Computer Weekly article but clearly, by August 2015 I was beginning to question the line that Post Office and George Thomson were promoting.
105. **I am asked to consider POL00162628 (Email chain from Angela Van-Den-Bogerd).**
106. **I am asked to explain why I sent the email of 19 August 2015 to George Thomson.**

107. Like a lot of Postmasters and also members of the general public, I watched the Panorama programme and received the Branch Secretaries Circular (BSC) that was issued by George Thomson on the 18th of August (see Branch Secretaries' Circular dated 18 August 2015, **WITN00370126**). I felt that the NFSP had to start thinking a different way and challenge Post Office. Despite the Post Office and the BSC claiming there were no systemic issues, that did not mean it was impossible for the computer system to add 2+2 and get 3 or 5.

108. **I am asked to what extent I discussed the matters raised in this email with others at the NFSP.**

109. I contacted both the Scotland Executive Officer and Regional Secretary for the issue to be placed upon the next Regional meeting, which was due to take place in October (see Emails between Calum Greenhow (as Branch Secretary), Donald Ramsay (Scottish Executive Officer) and Paul McBain (Scottish Non-Executive Director) after Panorama Programme 18 August 2015, **WITN00370102**; and Emails between Calum Greenhow (as Branch Secretary), Donald Ramsay (Scottish Executive Officer) and Paul McBain (Scottish Non-Executive Director) after Panorama Programme 19 August 2015, **WITN00370103**).

110. Following these emails, the NFSP Scottish Regional Council Minutes dated 2 October 2015 (**WITN00370131**) record the following from the Scotland Executive Officer: "BSC 24 under the spotlight with regards to the Horizon system and what it does or does not do. National President agreed that the Post Office did a lot wrong in the early years but there is no evidence that the systems were at fault. The National President also explained that the

system was checked annually for its robustness and no issues were found by these outsourced companies of which Price Waterhouse was one. The agreement with the delegates was to accept the response but believe that the issue would return due to MP signing an Early Day motion.”

111. **I am asked to describe the actions I took (if any) following George Thomson’s response to this email.**

112. I cannot remember whether I did anything further after the October Regional meeting. I would say that around this time, my wife and I were having to make a decision in relation Network Transformation and whether we would convert to a Local or leave the network. This would have a significant impact on our future, whether we could afford to remain in our home or would have to move and so I think there were many other significant aspects taking place around that time which I was dealing with.

113. **I am asked to provide an account of any steps I or the NFSP took between 2000 and 2019 (inclusive) in raising any concerns regarding the integrity of the Horizon IT System with POL, the Government, the Shareholder Executive/UK Government Investments (‘UKGI’), MPs and peers or journalists.**

114. My dealings with Post Office, Government, the Shareholder Executive/UKGI, MPs and peers or journalists only began after I took over as Chief Executive in 2018.

115. In December 2019 I wrote a Branch Secretaries Circular to all members (see NFSP - Branch Secretaries Circular vol. 31, **NFSP00000292**), where I call on Government to ensure that Horizon is monitored and reported

on transparently. I further called on Post Office to provide effective training, engagement and relationship building with a clear and easy process for flagging and escalating problems. If losses are identified, the focus should be on resolution, not prosecution. I concluded by directing any Postmaster who had suffered losses to contact the Complex Case Team.

116. Looking into the past, Colin Baker in his correspondence with Sir Alan Bates says “In relation to errors which members considered were due to Horizon problems, the Executive Council set up a joint Federation/Post Office Ltd group who visited the Horizon helpline site to discuss and resolve issues. It is my understanding that Post Office Ltd can trace the nature of any error including telephone calls relating to the same when the Horizon System is in question and, therefore, should be able to produce evidence that all is, in fact, correct from their side” (see Letter chain from Colin Baker to Alan Bates RE: Horizon System; **NFSP00001058**).

117. In August 2008, Michael Rudkin, the NFSP Chair of the Negotiating Committee (NC), visited Fujitsu’s headquarters in Bracknell due to concerns about the Horizon system. We have not been able to find a report on this visit, nor is it mentioned in either the Negotiating Committee or Executive Council minutes from the time period, but have located confirmation of his attendance (see Email from Martin Rolfe to Michael Rudkin others cc'd re: Bracknell Visit, **POL00021699**).

118. As discussed earlier in this statement, where there have been significant issues in relation to outages of the Horizon system resulting in Postmasters being unable to trade, the NFSP negotiated goodwill payments to Postmasters.

119. In February 2010, there is evidence that the NFSP ensured that the roll-out of Horizon Online was paused due to concerns about how it was working. This also included some form of compensation for these offices affected (see, for example, Branch Secretaries' Circular - February 2010 - Volume 9, **NFSP00001014**; and Letter on Horizon Online Pilot Review from Marilyn Stoddart with email attachment of feedback from Mark Burley, **NFSP00000061**).
120. **I am asked to describe my working relationship with Paula Vennells and the senior management team at POL and provide details of any meetings I had with the senior management team at POL in respect of concerns or allegations regarding the Horizon IT system.**
121. I took over my role in June 2018 and (as Ms Vennells indicated in her evidence to the Inquiry) she had taken a back seat by Christmas 2018. As such, there was very little cross-over. I do remember not long after I had taken over my role, being invited to a meeting by Tim Parker, the then Chair of Post Office (see Summary of meeting with Tim Parker and Paula Vennells on 29 May 2018, **NFSP00000040**). At the meeting Ms Vennells was present and I found the interaction strange. Having been part of a disciplined service such as the Fire Brigade, I had learned from that there was a way that senior officers acted in relation to junior officers and vice versa. No junior officer would interrupt or speak over a senior officer, but a senior officer will interrupt or speak over the junior officer, who will then immediately go silent. This attitude appeared to be present from Tim Parker to Ms Vennells, where on a few occasions Ms Vennells would be talking and then Mr Parker would interrupt and talk over her. On these occasions, Ms Vennells immediately

went quiet.

122. I had cause to write to Paula Vennells in September 2018, requesting the scrapping of Simplification given Post Office's profits had increased that year but Postmasters income had declined (see Email to Paula Vennells over Post Office's Annual Report & Accounts 14 September 2018, **WITN003700132**). Simplification was split in two parts. Simplification part 1 was implemented but Simplification part 2 was not.

123. As the Chief Executive of the NFSP, I was invited to Ms Vennells' leaving do at Finsbury Dials on the 30th of April 2019. My recollection of it was one of "for she's a jolly good fellow and so say all of us" being led by Tim Parker and Al Cameron. Given the outcome of the GLO, this whole thing did not sit with me and so I left.

124. **I am asked to describe the NFSP's relationship with the Communications and Workers Union ('CWU').**

125. The NFSP and the CWU have in the past been able to work collaboratively where our interests align, for example, in relation to the PostBank proposal in 2009, as presented to the All Party Parliamentary Group (APPG). PostBank was a proposal in 2009 for a bank owned by Post Office and a rival in the banking system as a new entrant and would have enabled us to encourage our POCA customers to bank with us. This was done in France and other countries, which is keeping their Post Offices viable but government did not want to do this due to the cost of a banking licence, which is why we currently have the banking framework. The CWU and NFSP's interests aligned in relation to this proposal, and we advocated for this at the APPG together (see CWU Research: Post Bank Campaign

Briefing, **NFSP00001110**; NFSP Briefing – Postbank: All Party Parliamentary Group for Post Offices, **NFSP00001116**; and All Party Parliamentary Group for Post Offices- Agenda for AGM/Meeting on Postbank, **NFSP00001105**).

126. As I discuss later in this witness statement, the CWU is a trade union representing, among others, Crown Post Office employees. The NFSP represents individual Postmasters who are self-employed small business owners and are not employees, although they may well be an employer. Our respective interests are therefore quite different. As George Thomson said in his oral evidence regarding the vote on the Memorandum of Understanding or merging with, for example, the CWU, the NFSP membership was not naturally inclined to want to be part of a large trade union. The vast majority of the CWU's membership is within Royal Mail and as both Royal Mail and Post Office are two separate organisations with different owners and shareholders, then the needs of our membership do not match.

127. The relationship between the NFSP and CWU has not been good since the NFSP announced their support for the Postal Services Bill in 2011. However, as this would mean the sell-off of Royal Mail, it was something that the CWU was very much against. This was also around the time that two Executive Officers of the NFSP, Mark Baker & Nippy Singh formed the Postmaster Branch of the CWU. I think it is fair to say that by then George and Mark did not have a good relationship and saw things differently on the Bill and also on Horizon, and this may well have led to the departures and bad feeling at the time.

128. In 2013 as Network Transformation completed its first full year, there were 373 Crown offices and 4511 Crown office employees according to Post

Office's annual accounts. By 2023, this had declined to 114 Crown offices and 1269 Crown office employees. Therefore some 70% of the number of Crown offices and Crown employees had been lost.

129. **I am asked to what extent did you or the NFSP liaise or communicate with the CWU and/or the JFSA in relation to the integrity of the Horizon IT System?**

130. I cannot say what conversations the NFSP of the past had with either the CWU or JFSA in relation to the integrity of the Horizon IT system. I am aware via the Inquiry and the documents that the NFSP have identified and supplied to the Inquiry that there was a Working Group back in 1999 on which were the NFSP, the CMA (now Unite) and the CWU. I do not know if there were any discussions at that point in the development and roll out of Horizon. I am aware that there was correspondence between Sir Alan Bates and Colin Baker, former General Secretary of the NFSP in late 2003 and early 2004 (see Letter chain from Colin Baker to Alan Bates RE: Horizon System; **NFSP00001058**).

131. I can say that I have had a meeting with Andy Furey, Assistant secretary of the CWU on 30th September 2018 where many topics were discussed. One topic was the impact of the Horizon on Postmasters and I said that my view was different to George Thomson's. Mr Furey did not offer any insight beyond what he stated in the 2015 BEIS Select Committee.

132. I totally understand, given the history, that there would be a reluctance for members of the JFSA to have involvement with the NFSP. To try to repair that, over the last couple of years, I have reached out to the JFSA via their website on four occasions, although have not heard back on this. I recently

asked one of the members of the JFSA if they might speak with Sir Alan Bates about the possibility of my meeting with him. My hope is that Sir Alan would understand that I am trying to help and have been changing the organisation which failed him and others in the past.

133. **I am asked to summarise the nature and extent of any involvement the NFSP had, or the support or representation it provided, in relation to the following matters:**

- a) **efforts by SPMs convicted of theft, fraud offences or false accounting to overturn their convictions; and**
- b) **POL's Initial Complaint Review and Mediation Scheme.**

134. In relation to efforts by Postmasters convicted of theft, fraud offences or false accounting to overturn their convictions, whilst we can tell from the June 2016 Executive Council minutes (**NFSP00000500**) that my predecessor thought that Freeths "were ambulance chasers", I can say that from *ad hoc* conversations I had with people, there were branch and regional secretaries as well as other individual members of the NFSP who encouraged Postmasters to engage with Freeths and the GLO. I can't recall names of individuals or what documents exist to show this.

135. The legal process was under way with court dates set when I took on the Chief Executive role in June 2018, and the NFSP was not a party in the GLO case. Therefore, I determined that it was right to allow the due legal process to take place and allow the courts to determine once and for all what the answer to the Horizon issue was. Added, as someone not experienced or practiced in the legal process, I did not think we could get involved at that late stage. I certainly had no idea that the NFSP would be a significant focus

of the GLO proceedings.

136. After the GLO rulings were handed down, I did not feel it right for the NFSP to try and “muscle in” on discussions. Rather I felt it was better for the NFSP to add its voice to the calls for full redress to be provided, as I was aware that due to the legal costs involved, many of the GLO claimants were still at a financial detriment (as discussed later in my statement). I did have a meeting with Postal Affairs Minister Paul Scully MP and Nick Read, where I called on Post Office to begin legal proceedings against Fujitsu for financial redress and for any sums to be passed on to the victims. I remember describing the situation as similar to an individual buying a car. On leaving the car garage, something terrible happens. As a result of that something terrible, the car owner is charged and prosecuted. However, later it transpires that both the car garage and the manufacturer knew about the fault in the car that caused the something terrible. It would then be a requirement for both the car garage and the manufacturer to be held to account and provide financial redress. As both Government and Post Office have provided the financial redress so far, I felt that it was imperative that Fujitsu should also provide financial redress. I have written many columns, given radio or TV interviews and have been quoted on many occasions calling for the victims to have their convictions quashed and for all of their losses, including consequential losses, to be refunded without delay.

137. In relation to POL’s Initial Complaint Review and Mediation Scheme, this all happened prior to my role as Chief Executive Officer so I cannot comment on any personal activity. The NFSP has provided evidence to the Inquiry in relation to the NFSP and the Complaints & Mediation Scheme,

including:

- a) Letter (Branch Secretaries Circular) from George Thomson to unnamed colleague re Horizon Mediation Scheme, **NFSP00000263**, which shows that George Thomson circulated the information pack on the mediation scheme to members through a Branch Secretaries' Circular;
- b) Email from George Thomson to Paul Hook CC'd George Thomson, Annabel Barnett RE;POL Horizon mediation scheme, **NFSP00000699**, which shows that the public line proposed regarding the mediation scheme was that the NFSP was welcoming the announcement of the establishment of the scheme, and was happy that the Post Office was saying that it would improve training and support;
- c) Meeting 29/8/13 148 Old St. Gayle Peacock, Stefani Ulgiati, Ann Analka, Andrew Gilhooly, Marilyn Stoddart, Ian Park, **NFSP00000695**, in contrast to the public line proposed above, this shows that George was not in fact supportive of the establishment of the Mediation Scheme, as the Inquiry heard through his oral evidence.

GROUP LITIGATION PROCEEDINGS

138. **I am asked to describe any involvement I had in respect of the GLO proceedings.**
139. There was no hand over from my predecessor, George Thomson, in relation to the GLO. I do remember prior to taking on the Chief Executive role

asking him why he was leaving at that point and was there anything coming down the line that I was not aware of that was encouraging him to leave at that point? His response that there was not anything that was specifically making him leave but he could see that things were going to get much harder.

140. In terms of my understanding from June 2018, neither I nor the NFSP had any involvement in the GLO proceedings, although we were aware of it taking place. However, when the case was running my team and I did follow Nick Wallis' live blog on the court proceedings which was very helpful and enlightening. As such I researched what documents that NFSP had in relation to the whole issue such as the Second Sight reports. It was through this that I learned Sir Alan Bates had been corresponding with the former General Secretary, Colin Baker and also Stephen Timms, the former Postal Affairs Minister about his situation (**NFSP00001058**). It is in the reply from Stephen Timms to Sir Alan's MP Betty Williams where the "arms length" position of Government in Post Office matters was described. Also, in the reply there is personal handwriting that states "I am trying to find out what the dispute is here." I have not been able to find any evidence to say who the Minister asked in 2003 and what, if anything, he found out. However, I do wonder if the Government had taken a different view at that time, could this situation have been prevented?

141. After the Common Issues judgement, I met with Lord Arbuthnot in July 2019 and am grateful for his time and hospitality within Westminster and the helpful way in which he explained the events of the Horizon scandal. This provided me with a different view to what I had heard within the Post Office

world, which was “that there were no systemic issues” or that “Horizon was robust”.

142. In my role as the new Chief Executive of the NFSP I felt it was important to show I was not anti the GLO in the way that George Thomson had been. I therefore attended the first day of the trial. I remember being on my own in the court reception area and saw Sir Alan came out of the court. I wanted to go and introduce myself, shake his hand and thank him for his courage but unfortunately, there was not the opportunity in that brief moment.

143. **I am asked to consider NFSP00000707 (Email from Calum Greenhow To: Keith Richards, Sharon Merryweather, Lynda Willoughby re FW: RE: Branch Refresh).**

144. **I am asked to comment on the following extract from my email dated 24 April 2018: “Add to this that there have now been 4 system faults over the last month, which have caused nationwide access problems thus I am concerned that we are handing Freeths a stronger case to bring to court in November as “the present is a guide to the past” is a strong argument.”**

145. In order to understand this comment, at the time I was dealing with a rollout of updated hardware and software of Horizon. As we know now, it was only through the court proceedings of later in 2018/2019, that Post Office finally admitted that there were known bugs, errors and defects in the Horizon system and that remote access was possible. At this point in April 2018, Post Office were still maintaining the robustness of the Horizon system. Now, during the rollout of this new HNG-A hardware, there were Postmasters who were having very major issues with it, including occasions

where the network had gone down. This was causing significant frustration, resulting in Postmasters being unable to trade and therefore generate an income.

146. What I was trying to do here in saying those words was to push Post Office to do better and be more understanding about how these issues were impacting Postmasters. Therefore, I have to say, I was using the events in the GLO to make Post Office sit up and listen for the betterment of the affected Postmasters. I was saying to the Post Office “do something” or they would be ending up with this new issue becoming part of the court case. I was trying to get them to sit up and take notice or they would have to face the consequences of not doing so.

147. **I am also asked to comment on the following extract from my email dated 24 April 2018: “I believe also that it is important for both the Post Office and NFSP to work together to restore confidence in the computer system agents use as matter of course. The retail world is a difficult place at present with competition rife and therefore it is important for the business to keep its agents very much on side for it to maintain its network size as well as grow and thrive within a challenging market place.”**

148. In 2013, Postmasters total income was £478m. If we take inflation into account from April 2013, that income would be worth £648m at March 2024. However, Postmasters’ income to March 2024 was £398m, some £250m of a difference. That’s the equivalent of nearly £22,000 per office. In 2005, income to Post Office Ltd for Government services was £576m. By 2010, that had declined to £167m. Today it is around £30m. In the financial year ending

March 2024, my own office earned just £113 from Government services.

That is how the impact of decisions within Government and Post Office are affecting my Postmaster colleagues today.

149. When I took over my role, I recognised that the relationship between the Postmasters and Post Office was broken. Culturally, Post Office considered themselves to be the dominant party within the relationship. I was and remain hopeful of repairing that relationship and ensuring it is one of equal partners. Central to that relationship is Postmasters confidence in the computer system we use. That confidence was being eroded due to the events surrounding the GLO and specifically in April 2018, due the hardware/software issues I have described above which Postmasters were experiencing. It was these issues that I was highlighting to Post Office in my email to Rob Houghton who was the Post Office's Chief Information Officer.

150. It is my role to bring the concerns of Postmasters to those within the Post Office to work with them to identify and implement solutions. As Postmasters income is variable depending on the number of transactions, if Horizon is not working or a product is not available, that has an immediate and direct impact on their income. I have to remind Post Office employees that whether Horizon is working, or a product is available or not, has no impact on their earnings. Therefore, I was trying to motivate Post Office to go that extra mile in support of Postmasters.

151. **I am asked to consider NFSP00000710 (Email form Jon Follenfant to The Subpostmaster, Jim Nott, Kevin Whitlock and others RE: Articles for the Magazine).**

152. **I am asked to explain why the NFSP adopted the approach as**

discussed in this email chain dated 14 November 2018 regarding the extent to which the GLO proceedings would be reported on in the Subpostmaster magazine.

153. Simply put, those of us in the email chain were not a party in the court case. Nor were we privy to the detail of the information that the court would be considering over a fairly lengthy period. However, I had faith (I am sure the others in the email chain felt the same) in the due legal process and that it was for Fraser LJ, who had the authority to compel the Post Office and the claimants to lay all evidence before him to enable him, to come to a conclusion. I felt it was not for the NFSP, at that time, to be making any comments other than presenting the facts to the network via The Subpostmaster magazine. In the BSC entitled Letter from Calum Greenhow to Colleague re Group Litigation Bates v Post Office, (NFSP00000870) I was saying there are important issues affecting those in the GLO group and that the full legal process should take place without interference from the NFSP and we would comment after the judgement.

154. **I am asked to consider NFSP00000779 (Email chain from Lynne Eccles RE: NFSP piece), in particular the following extract from Lynn Eccles' email dated 16 November 2018 : "Nick will criticise us for hiding behind court process but given that we are no longer firmly coming down on one side or the other I think that's the best we can do for now."**

155. **I am asked to explain why the NFSP's position was that they were "no longer firmly coming down on one side or the other" during the GLO proceedings. Where the NFSP's position changed on this point**

over time, I am asked to provide details.

156. It is clear what George Thomson's view on Horizon was and the way in which he led the organisation. However, I hope the Inquiry accepts that my view and actions have been different. I believe that my approach to managing the NFSP, which is more collaborative and encouraging of different views, allowed my colleagues at the NFSP and our members express a core belief that Post Office may well be in the wrong here. This was due the number of people involved, as per my email to George Thomson in August 2015 and our experience of Post Office's fervent cultural stance which historically has been detrimental to Postmasters.

157. Therefore, Lynn was rightly expressing a different stance on the court proceedings. This view is explained further in our later email to Nick Wallis (Email chain from Peter Hall to Nick Wallis RE:Book, **NFSP00000777**) in which we say that the NFSP, under new management, felt it appropriate to observe and make decisions based on the outcome of the GLO.

158. **I am asked to consider NFSP00000774 (Email from Calum Greenhow to Calum Greenhow re: FW: Press and other enquiries RE Post Office trial), in particular the following extract from Peter Hall's email dated 21 March 2019: "... where the judgement has found issues with Post Office Ltd's approach to dealing with subpostmasters where a shortage has been identified – the NFSP has challenged PO on many of these same issues in the past. Broadly speaking, we wouldn't necessarily disagree with many of the criticisms levelled at PO."**

159. **I am asked to provide an account of the occasions where the NFSP challenged POL on their approach to dealing with SPMs where a**

shortage had been identified.

160. In his email, Peter was referring to Fraser LJ's reference in his Horizon Issues Judgment of December 2019 (**UKGI00018137**), at paragraph 232 where he said "*and the NFSP had privately expressed its concern to the Post Office about Horizon.*" Examples of those concerns can be seen in the Marilyn Stoddart emails discussed earlier.
161. One example of the work which the NFSP has done to challenge the Post Office when they have held members liable for shortages relates to what is known as the Green Girocheques issue.
162. An outline of this issue can be seen in the NFSP Report to Calum Greenhow on Girocheques Issue by Andrew Gilhooly (former National President and NED for Scotland of the NFSP) (undated) (**WITN00370101**). This outlines how in around – 2005/2006 the Post Office was holding Postmasters liable for the losses arising from accepting cheques that were excellent forgeries and could only be identified as forgeries by the DHSS by checking their serial numbers. The NFSP argued that the losses being experienced by the Postmasters were due to them unknowingly accepting fraudulent cheques which were part of organised crime. Therefore, the Postmasters should not have been held liable. The Executive Council took advice from Counsel and solicitors, who considered that the NFSP had an excellent case against the Post Office's position. It is understood that at the time, George Thomson advised the Post Office that the NFSP was intending to take legal action. The Post Office conceded that Postmasters were not liable for such losses two days later. The Post Office then set up a board to scrutinise the counterfeit cheques and 95% of Postmasters (i.e. those who

met the security regulations for encashment) received a refund of funds that Post Office had recovered from them in relation to these losses.

163. The Girocheques issue showed that there were occasions when data was being fed up through the branch network chain that was consistent across a range of sub-post offices and appeared to be about organised crime. As a result of that the NFSP at the time were able to collate data from a number of sub-post offices and challenge the Post Office on the basis of this data. It also shows that Post Office were not willing to negotiate until threatened with legal action. It is an example of an issue where the NFSP was able to take a collective position based on the consistency of evidence coming through from branches which showed the same thing was happening in different offices in different places.

164. It is a real regret that a consistency of issues and reports from branches were not coming through about Horizon in the way in which an organised crime issue such as the Green Girocheques was. I understand from what I have seen and heard at the Inquiry that due to George Thomson's consistent position on: (i) the requirement for; and (ii) the entire network's reliance on Horizon that he did not put information coming through to him, such as the letter from Lee Castleton in 2009 (**NFSP00000888**) and the email from Alan Bates in 2012 (**POL00296010**), in the same category.

165. The NFSP has supplied hundreds of documents to the Inquiry showing how we supported members across a myriad of issues, throughout the relevant time period, and further examples of these have been provided elsewhere in this statement, including where I provide an overview of the methods the NFSP adopted to represent its members' interests between

2000 and 2019 above.

166. **I am asked to consider:**

a) **NFSP00000558 (NFSP council meeting minutes dated 25 and 26 March 2019);**

b) **NFSP00000712 (the email dated 15 March 2019); NFSP00000774 (the email exchange date 21 March 2019).**

167. **I am asked to describe the NFSP's response to the criticisms raised in the Common Issues Judgment (POL00113269) in respect of the NFSP.**

168. Not being legally trained, nor having any experience of such circumstances before nor having been involved in the court case, we were surprised to feature so prominently in Fraser LJ's ruling. It is also an important factor for us that the ruling was being used to attack the NFSP, and to undermine and cause division within the network. Therefore, at the immediate time of the judgement being issued, the NFSP felt it was necessary to make a statement on what had been said about it. On reflection I can see that this was a knee-jerk reaction. Once I'd had time to read and understand the full impact of the judgement and the effect of what the Post Office had done and how the GLO members had suffered, I began to take steps to acknowledge the NFSP's failures. I initiated the efforts to make changes to the GFA (described later in this witness statement), to reach out to others to better understand the situation, such as Lord Arbuthnot, and to engage with the efforts which had begun regarding redress (also described later in this witness statement).

169. One matter which remained outstanding for us, however, is in paragraph 589 of the judgement where Fraser LJ comments that he found “*behaviour highly suspicious*” about changes which were made to our website and where the GFA could be found (**POL00113269**). If we had been asked, we could have easily explained the reason for the changes. As part of the process of improving the NFSP, we were working on our Mission, Vision and Values statements along with the tone of voice and the look and feel of our website. As part of that, our Communications Director was making those changes and had taken the GFA down from the website, as her plans were for there to be a specific location for it because it was felt that the “About Us” section was not the right location. As she was doing this work and while following Nick Wallis’ blog, she realised that the court proceedings began discussing the GFA so she felt it would be important to put it back on the website in case anyone following the case went to look for it. I can confirm that there was no attempt to act in a suspicious manner. The reason no-one from the Post Office could answer the court’s questions was because these changes were being made on our website which was independent of the Post Office.

170. **I am asked to consider:**

- a) **NFSP00001387 (Email chain from Calum Greenhow to Calum Greenhow RE: FW: Revised column - Column for April magazine NFSP); and**
- b) **NFSP00001234 (Email from Sharon Merryweather to Douglas Kemp and Calum Greenhow - Re: FW: Message Via Contact Form on Website).**

171. I am asked to what extent did the NFSP provide support to SPMs (both those who were a party to the GLO proceedings or otherwise) who had experienced a historic shortfall which may have been due to the Horizon System, following the handing down of the Common Issues Judgment.

172. The NFSP is not aware of all of the individuals who were involved in the GLO. However, via the Subpostmaster magazine, newsletters, radio and TV interviews, I and my colleagues have promoted the Historical Shortfall Schemes and support a number of Postmasters who have come forward for help. To date, between the original historical shortfall scheme and the late claimants scheme, 650 Postmasters have sought the help of the NFSP.

173. We have met regularly with Simon Racaldin of the Post Office to encourage as broad and as swift a response as possible. We keep a central register of who we have supported. The NFSP has met with Government Ministers and civil servants urging broad and swift redress.

174. We have publicly supported and called for the victims to have their convictions quashed so that the unjust stain is removed. When there was the change of law announced this year that initially excluded those in Northern Ireland and Scotland we wrote to the Justice Minister and Attorney General of Northern Ireland, who very graciously met with the NFSP in support of changes in the English & Wales legislation to enable victims in Northern Ireland to be included. Despite several attempts to meet with the Justice Minister and Lord Advocate in Scotland, we have not yet been offered the same opportunity. However, we do note the Post Office (Horizon System) Offences (Scotland) Act which came into law in June 2024.

175. In relation to Mr Kemp (see **NFSP00001234**), as this was before the Historical Shortfall Scheme had been established, we directed him to Freeths who were the solicitors we knew were involved in the GLO and therefore had the background to help him.
176. **I am asked to comment on NFSP00000715 (Email from Peter Hall to Calum Greenhow. RE: Elephant in the room section of the magazine article on your conference speech), in particular the following extract from Peter Hall's email dated 1 May 2019: "Calum stated that Justice Fraser allowed the court to be embroiled in a conspiracy theory perpetrated by those who seek to occupy the space the NFSP does as the representative body for subpostmasters."**
177. I've described above the issue of the way in which the GFA on the NFSP's website was described in the judgement. The ruling says that in relation to the moving of the GFA on the website, the second sentence on the website (i.e. the wording about where people could find information about how the NFSP was established as a trade association and linking to the GFA) must have been added to bolster the Post Officer's position regarding transparency (see the Common Issues Judgment at paragraph 594, **POL00113269**). It is the way in which others with an interest in undermining the NFSP have used this part of the ruling. In truth, what took place was innocuous and wholly unrelated to the Post Office. It was this which caused me to make the comments recorded by Peter. Through the Inquiry, I do wish to clarify and confirm that the NFSP did not make any changes to its website to bolster the position of the Post Office.
178. It is clear, however, that the full wording of the email shows that my

focus was not primarily on the reputation of the NFSP but on the needs of Postmasters through the creation of the Legal & Regulatory role with the purpose of challenging Post Office to ensure that nothing like the Horizon scandal could happen again.

179. **I am asked to consider POL00393126 (Email from Calum Greenhow to Mark R Davies RE: Support to Sustain our Post Office) and UKGI00017689 (Email from Joshua Scott (UKGI) to Tom Cooper, Tom Aldred, Oluwatosin Adegun and others Re: POL Biweekly Comms Catch up).**

180. **I am asked to describe my working relationship with Mark Davies.**

181. Mark Davies and I met occasionally, rather than regularly. Therefore, I cannot comment on the extent of our relationship other than I found him professional when we met.

182. **I am asked to explain why POL was kept informed in relation to the NFSP's media statements.**

183. Postmasters as investors in the business see themselves as de facto business partners of Post Office. In general, they do not want a bone-on-bone adversarial relationship with the business. We need to work together with Post Office to drive improvements and encourage growth in our remuneration.

184. When it comes to communications either internally or externally, the relationship is and should be two-way. Post Office informs the NFSP on what they will be putting out and the NFSP informs Post Office what we will be putting out. Sometimes, it will be similar, whilst other times it will be from a

different perspective.

185. Given the importance of the Horizon judgement, I considered it was part of that relationship to inform Post Office what we intended to release.
186. **I am asked to consider: POL00291032 (the email exchange dated 18 December 2019); POL00291026 (NFSP's draft statement on the Horizon Issues Judgment); NFSP00000292 (NFSP's statement on the Horizon Issues Judgment); NFSP00001321 (the email exchange dated 20 December 2019).**
187. **I am asked to describe my working relationship with Nick Beal.**
188. Mr Beal was the liaison contact between Post Office and the NFSP therefore we would talk or meet on a fairly regular basis to cover a wide range of issues pertinent to Postmasters such as remuneration or network changes etc. In my view it was professional throughout. Mr Beal moved in 2021 to become involved with the Horizon replacement, NBit.
189. **I am asked to explain why POL was asked to comment on the NFSP's draft correspondence with SPMs.**
190. I am unable to recall the reasons why I was informing Post Office about our statement on the GLO verdict. However, I think it was simply part of the relationship I have described above in providing Post Office with notice as to what the NFSP were going to say and also how we felt about the whole situation. The tone and content of my email to Nick Beal and Patrick Bourke makes my view point very clear, in that I believed that Post Office had misled the NFSP in relation to Horizon.
191. I am aware that the Post Office sent us a copy of their response to the

GLO verdict to the NFSP on the 16th of December 2019 (see Email from Nick Beal to Calum Greenhow, Peter Hall re: Media statement - concerning Post Office Response to Group Litigation Judgment, **NFSP00000718**).

192. From memory, I have no recollection being informed of the content of Melanie Corfield's email. To my knowledge, she is not someone I know or have dealt with.

193. **I am asked to provide an overview of the comments provided by POL (if any) in respect of the NFSP's draft statement on the Horizon Issues Judgment and describe the extent to which POL's comments influenced the final version of the NFSP statement which was circulated to SPMs.**

194. The statement was drafted by the NFSP and sent to the Post Office in terms of the relationship I have described above. The draft NFSP statement reflected that the Post Office prided itself on being the UK's most trusted brand, but the three trials exposed the reality of their culture and attitude towards Postmasters, assistants and Crown office employees. Given Post Office had always maintained to the NFSP that the system was robust, and that remote access was not possible, the three verdicts showed that Post Office had misled everyone, including the NFSP, on these important points. The NFSP also wanted to draw attention to the need for the relationship between Postmasters and the Post Office to be repaired. Having reflected on the draft, the tone was adjusted in the final version as issued, to provide a more pragmatic and considered view rather than a reactive one.

195. In relation to the emails between Melanie Corfield and Patrick Bourke, I was not aware of those emails or what was said in them, and I have no

recollection of anybody from the Post Office ever bringing these issues to my attention. Therefore, I do not believe that they affected the tone or content of the statement that was issued.

196. In relation to the Email from Amanda Cox to Mr Andrew B Summers cc, Calum Greenhow RE: Horizon trial judgement FAD: 200647 Post Office: Orleton PO, **NFSP00001321**, Mr Summers emailed the NFSP on the 20th of December, 2019 asking why the NFSP was directing Postmasters to the Complex Case Team in the Branch Secretaries Circular. I replied to explain why. The NFSP is a small organisation dealing with many issues affecting Postmasters, not just the outcome of the GLO. As Post Office, under the auspices of Government, had set up a specific team, it was right for us to make it clear where past and present members could go for help. If they had issues, they could always come to the NFSP for additional support, as many have (as discussed later in this statement).

THE GRANT FRAMEWORK AGREEMENT

197. **I am asked to consider:**
- a) **NFSP00001079 (a note from a meeting about the Grant Framework Agreement);**
 - b) **NFSP00000766 (the email exchange requesting legal advice dated 15 November 2016);**
 - c) **NFSP00001390 (the email which contains a note from a meeting with legal advisors dated 24 November 2016);**
 - d) **NFSP00000727 (the email exchange requesting legal advice dated 19 December 2016);**

- e) **NFSP00000534 (NFSP council meeting minutes dated 19 and 20 June 2017 – in particular page 12);**
- f) **POL00027276 (POL Group Executive Agenda dated 14 September 2017 – in particular pages 39 to 44);**
- g) **NFSP00000710 (the email exchange dated 14 November 2018).**

198. **I am asked to explain what the Grant Framework Agreement was and how it operated in practice.**

199. As a result of the delisting of the NFSP as a trade union due to the decision of the Certification Officer (Letter (with enclosure) from David Taylor to G Thomson re: Trade Union and Labour Relations (Consolidation) Act 1992, Removal of Nation Federation of Sub-Postmasters from the list of trade unions, **NFSP00001464**), the NFSP in consultation with its members looked at what options were available to it. These included a merger with the CWU, a merger with the National Federation of Retail Newsagents or the Memorandum of Understanding (MOU)/Grant Framework Agreement (GFA) with the Post Office. A two-day Special Conference took place in June 2015, where members of the NFSP voted for the MOU/GFA rather than a merger with either the CWU or the NFRN. At every level of the NFSP; Branch and Regional as well as National, the members voted for the MOU/GFA (see Transcript of the Special Conference, **NFSP00000957**). I discuss how I was mandated to vote by my Branch members earlier in my statement.

200. The Grant Framework Agreement (**NFSP00000758**) is an agreement between the NFSP and Post Office to provide funding from the Post Office to enable the NFSP to offer support to Postmasters. It was designed so that this

support was free at point of use to all Postmasters.

201. The NFSP is provided with an Annual Grant for £1.5m inclusive of VAT to cover the general provision of negotiating with Post Office aspects relating to Postmasters as described in clause 1.3 of a Postmaster's contract (see, for example the contract for Mains Offices, **POL00003870**), which says the NFSP is the only body which Post Office Limited will seek to discuss and consult on matters affecting operators subject to any legal, regulatory or political obligations. We also represent Postmasters if there has been a perceived breach of contract. Added, we challenge, review and comment on Post Office policies on behalf and for the benefit of Postmasters. The Annual Grant is there to provide welfare and support to Postmasters in relation to the entirety of the Postmasters business. The Annual Grant also provides an honorarium to Regional Secretaries (£1200), Regional Treasurers (£1200) and Branch Secretaries (£600) to offer help and support to Postmasters within the Regions and Branches. Costs for meetings are also covered, along with travel expenses, hotel accommodation and substitution cost for those members attending our Annual Conference.

202. In addition, there is £1m available to the NFSP to provide project specific help and support. We have utilised this funding to provide Mail Segregation support that has returned £16.1m for Postmasters at a project specific cost of £3.2m since 2017. That is for every £1 spent, Postmasters have received £5.

203. Rightly, the NFSP prepares an annual plan or project specific plan detailing how the funds will be used in the year or over the length of the project. Understandably, Post Office check that the NFSP are using the

funds as intended.

204. **I am asked to explain the extent to which (if any) the restrictions on the NFSP under the terms of the Grant Framework Agreement impacted the support and/or representation provided to SPMs by the NFSP.**

205. There are two specific areas of the Grant Framework agreement that are an issue. They are clause 5.3, which has a broad range of restrictions regarding the activities of the NFSP. For example, under the GFA the NFSP could not undertake any public activity which may prevent Post Office from implementing any of its initiatives, policies or strategies. In the event of the NFSP carrying out activities contained within 5.3, then Post Office could invoke aspects of clause 17 – Withholding, Suspending and Repayment of Grant via event clawback.

206. I cannot comment completely on the GFA as I was not involved in the discussions that led to the GFA. Due to the timing of the GFA being in 2015, I don't believe the GFA and the restrictions in clause 5.3 cover the majority of the time period the Inquiry is considering as the GFA was not in place until the vote of the membership in 2015. I do appreciate and understand the reference made about the GFA by Fraser LJ in the Common Issues judgement of 2019 (**POL00113269**), however, that does not appear to cover the period which the GLO cases were concerned with. While there are questions as to how George Thomson and the NFSP dealt with the Horizon issues, the NFSP was a trade union until 2014 and throughout the majority of the time of the Post Office prosecutions and recoveries. The GFA was not in place during that time.

207. Colin Baker's stance on Horizon in relation to Sir Alan Bates in 2003, did not have anything to do with the GFA. George Thomson's views in relation to Lee Castleton in 2009 similarly would not have had anything to do with the GFA. Having seen the evidence of George Thomson, I do not believe the GFA restricted his actions in relation to Horizon, not only because of its timing but because it is clear he believed and still believes that Horizon was 'robust'.
208. In terms of the period post-2015 and in respect of the period since I have been Chief Executive, I do not consider it is the GFA that makes things difficult for the NFSP in terms of representation of Postmasters. It is the Post Office and its culture. It is trying to work with the Post Office to engage with what's needed on behalf of the members, such as negotiations trying to get the remuneration necessary for Postmasters to operate. I have used what Fraser LJ said about the GFA (see the Common Issues Judgment, **POL00113269**, at section F) in meetings of the Grant Committee with the Post Office because I have felt the Post Office are not providing the necessary funding for Postmasters to run their retail business.
209. I can say from my own position as Chief Executive that the GFA has not prevented me from publicly criticising, questioning and making statements about the Post Office, including at this Inquiry, about this Inquiry and about matters such as Hard to Place, Postmaster remuneration and the way in which the Post Office does not appear to consider Postmasters as investors in their business. I recognise that my public criticisms may have an effect on how the Post Office regard and treat the NFSP by, for instance, dealing with other organisations and not always including the NFSP in

discussions. However, I believe it is important to publicly speak out where the decisions and actions of the Post Office have the potential adverse effect on Postmasters and their businesses. I discuss the revisions to the GFA which the NFSP has been promoting and working on since Fraser LJ's Common Issues judgement and also the future of the NFSP without a GFA later in this statement.

210. On reflection, the GFA really comes about because of the decision of the Certification Officer that the NFSP could not continue as a trade union. If that had not happened, I do sometimes wonder what the future of the NFSP would have been, and for instance, if mutualisation of the Post Office had happened and the NFSP had then changed to accommodate that type of business structure.

211. In 2019, as a result of Fraser LJ's Common Issues Judgment (**POL00113269**), the NFSP recognised the criticisms of the GFA and what it said about the relationship between the Post Office and the NFSP.

212. From then, with the help of our solicitors, we have negotiated with Post Office to revise the GFA to ensure it is less restrictive. This should be signed shortly, and we will provide this to the Inquiry when available. It has not been easy. For instance, trying to get the words that the parties would always act 'in good faith', even where it was not sought to make that legally binding, proved impossible to achieve. Some of the changes in the revised GFA under the annual grant funding purpose of the NFSP include: (i) negotiating changes to remuneration on behalf of and for the benefit of Postmasters; (ii) challenging, reviewing and commenting on new or updated Post Office proposed policies or proposals on behalf of and for the benefit of

Postmasters; (iii) representing its members including in relation to disputes with Post Office; (iv) providing welfare and support to Postmasters in each case in relation to Postmasters, operation of Post Office branches and all business carried on by Postmasters on their own account from Post Office branch premises in accordance with their contract for the operation of the Post Office branch.

213. In the past it was clause 5.3 that everyone pointed to, the updated GFA removes those restrictive clauses which previously gave the Post Office the ability to use the GFA to effectively control the activities of the NFSP. One of the things we couldn't do was bring legal action against the Post Office and now we can. I think it also makes it clearer what the core purpose is of the NFSP is in terms of negotiating, representing, challenging and providing welfare.

214. The protracted nature of those negotiations (as discussed later in this statement) shows, in my view, that the "leopard has not changed its spots" and regardless of who they are negotiating with, the Post Office has to be in a position of control at all times.

215. The financing of the NFSP is not the real issue, as in the past grants to undertake specific projects and fund specific roles for those and the provision of facilities were provided by Post Office. It was the ability for the NFSP to be free to challenge the Post Office and be able to be the representative body that Postmasters need which was the issue. The updated GFA should enable the NFSP to defend the interests of Postmasters within a constructive and collaborative relationship with Post Office. As described elsewhere in this witness statement, the NFSP is providing examples of how that relationship

can develop, change and improve for the benefit of Postmasters.

216. **I am asked to consider the NFSP report of a meeting of the Council held on 19 & 20 June 2017, NFSP00000534.**

217. I had been on the Board for about a year in 2017. I don't recall any discussions prior to this meeting about the "express instructions" being referred to. It does show how the Post Office operated the restrictions that were within the GFA in place at the time, and how those restrictions at the period from 2015 until Fraser LJ's Common Issues judgement, were implemented. This is combined with George Thomson, on his evidence, of being supportive of Horizon and unsupportive of the JFSA and GLO and therefore not supporting or wanting to be seen to support those groups.

218. **I am asked to consider NFSP00000728 (Email from Calum Greenhow to Calum Greenhow re: FW: Grant Agreement - to be published on the 'about us' page on the website).**

219. **I am asked to explain why there was a delay between the execution of the Grant Framework Agreement and the publication of that document on the NFSP's website.**

220. As this was before my time, I cannot comment specifically on what the Inquiry is asking for other than that it would appear Post Office in December 2016 were in agreement for the GFA to be published. This could be in relation to a requirement under clause 23 that neither parties (Post Office & NFSP) shall make public statements without prior written agreement of the other party.

221. **I am asked to explain why approval from POL was required before the Grant Framework Agreement could be published on the NFSP's**

website.

222. As this was before my time as Chief Executive, I cannot comment on whether the NFSP specifically required agreement from Post Office to publish the GFA. This again could be in relation to clause 23.

FINANCIAL REDRESS

223. **I am asked to consider:**

- a) **NFSP00000905 (NFSP Branch Secretaries circular dated 11 December 2019);**
- b) **NFSP00000492 (NFSP council meeting minutes dated 16 June 2020);**
- c) **UKGI00030616 (the email exchange dated 2 July 2020);**
- d) **NFSP00000778 (the letter from Nick Read dated 16 July 2020).**

224. **I am asked to provide an overview of the methods the NFSP adopted between 2019 and the present date to support SPMs and represent their interests in relation to compensation and financial redress for losses suffered as a result of the Horizon IT system. Where this changed over time, I am asked to provide details.**

225. In addition to the documents I have been to consider, I would also refer to the Letter to Nick Read (Group CEO, POL) from the NFSP re further compensation of GLO claimants 9 July 2020 (**WITN00370105**). One of the methods the NFSP adopted between 2019 and the present date to support Postmasters and represent their interests in relation to compensation and financial redress for losses suffered as a result of the Horizon IT system was writing to Post Office to ask them to include the GLO Claimants in the

Historic Shortfall Scheme (HSS) and ask Fujitsu to contribute to compensation.

226. Once the GLO was settled, it came to the NFSP's attention through various discussions with UKGI, Post Office etc. that much of the settlement sum had been used up by legal and other fees, meaning that the actual sum received by the claimants was not significant. The NFSP felt that this was unfair, not least because the HSS was only made possible by the GLO. It seemed unfair that a Postmaster applying to the HSS could be reimbursed to the full value of their losses, but the GLO Claimants could not apply, having received a sum less than the amount that Post Office took from them. I therefore outlined this in a letter to Nick Read dated 9 July 2020 (**WITN00370105**). The NFSP made continued efforts to ensure the GLO claimants were included in the HSS, including discussion with the Post Office, DBT and UKGI, along with communications to members, letters to ministers, etc.

227. The NFSP has continued to receive queries from Postmasters about the HSS and are working to ensure that the members can be given the appropriate legal advice and support in order to ensure their claim is properly dealt with.

228. The NFSP has helped around 650 Postmasters who have approached us for help in relation to compensation and financial redress. The original HSS was open from May 2020 and was set to close in August 2020. The NFSP was putting pressure on the Post Office to extend that date, and I believe that others representing claimants and potential claimants would have been doing the same. In the end, the scheme remained open until

November 2020. During that time between August and November 2020, approximately 120 Postmasters approached the NFSP for advice and help in understanding what the scheme was, how it worked and whether they were eligible to claim. From the outset of the scheme and following each individual's permission, we retained a spreadsheet of every Postmaster who came to us with details of their claim, so that we could help them if their claim was stalling.

229. Following closure of this original scheme, many more Postmasters came forward to the NFSP. They were told by Post Office that they were too late to make a claim. However, we retained a list of everyone who came to us for advice. This was extremely useful when, in 2022, the Government agreed to allow late claims to be processed. Although this was widely publicised, we were able to contact those that had come to us to advise that a similar scheme to the HSS was now open to all late claims. Applications for this new scheme were opened in October 2022 when a new claim form was produced by the HSS. We were (and still are) able to send the form to anyone who came to us to check whether they were eligible to claim. In reference to the new scheme, to date the NFSP have helped approximately 500 different Postmasters, both past and present, to advise on their individual situation and supply them with an application form to complete and submit. Follow up advice has been sought by many individuals before submitting their claim to ensure their application is correct. This advice has been given to both members and non-members, past Postmasters who have left the business many years ago, family of those past members and family of Postmasters who have sadly passed away.

230. We have also been available for follow up advice when a Postmaster has had an offer letter from the HSS and is unsure whether to accept it or not. We will talk them through the options they have to allow them to make an informed decision themselves as to whether the offer is right for them or to go back and challenge the amount. However, we will not make that decision for them. We do offer Postmasters the option of seeking legal advice on their claim if they would prefer that option.
231. We have also lobbied Government and the Department for Business and Trade along with its previous iterations for a wider scope of involvement for those Postmasters impacted and their ability to access redress.
232. We have continued to work on this through to the present day and will continue to do so. An example of this is that NFSP is able to use its relationship with the Postal Affairs Minister, other MPs, and key stakeholders to support Postmasters and represent their interests in relation to compensation and financial redress for losses suffered as a result of the Horizon IT system, as well as wider issues. An example of this is the letter written from the NFSP to Kevin Hollinrake MP on 8 January 2024 in the wake of the ITV drama *Mr Bates vs the Post Office* (**WITN00370106**). This shows that the NFSP was concerned that it was nearly five years since Fraser LJ's Common Issues judgement, but victims had still not received compensation, and it took the TV drama and its aftermath for the government to take speedy action on the compensation issue.
233. The NFSP wanted the Government to ensure that there was an external audit of Horizon with a published report to ensure that Horizon users of today could have confidence in the Horizon IT system, given that it had

been nearly five years since Fraser LJ had concluded it was not robust. We also brought the NFSP's concerns about the governance of the Post Office to the Postal Minister's attention. The NFSP has proposed an Oversight Committee to address this, which is discussed later in this witness statement. In relation to the monies paid to Post Office by victims, the NFSP called for a full investigation into debt recovery by the relevant authorities to determine where this money went.

WHISTLEBLOWING

234. **I am asked to describe any practice, policy or procedure adopted by the NFSP between 2000 and 2019 (inclusive) to enable members or officials to report wrongdoing in so far as it related to the matters to which this inquiry relates.**

235. There was no formal whistleblowing policy in place for members to use. It became clear as a result of hearing the evidence of George Thomson at the Inquiry that this was a gap in our procedures and there was a need to address how complaints about NFSP officials and senior leaders could be made and how whistleblowing could be facilitated. These have now been drafted and will be discussed with the Board at its meeting on 2nd September before being signed off and put onto the NFSP website. This will be provided to the Inquiry.

236. Prior to the introduction of formal policies for members to use, members could contact either the General Secretary/Chief Executive Officer or National President/Chair to raise a concern about an issue that would affect them or an official of the NFSP. Their concern or complaint could also be raised with their Branch or Regional Officials including their Executive

Officer or Non-Executive Director.

237. When the NFSP was a trade union, complaints could also be raised with the Certification Officer, if members felt that the NFSP had not handled the complaint correctly or treated it seriously enough. The process of raising a complaint can be found on the Certification Officers website. There are examples of where complaints by members about the NFSP were raised with the Certification Officer and these can be found on the Certification Officer's website.

238. **I am asked to describe any practice, policy or procedure that the NFSP currently has in place to enable members or officials to report wrongdoing in so far as it relates to the matters which are relevant to this inquiry.**

239. As discussed above, the NFSP is introducing both a complaints procedure and whistleblowing policy for members to use. We will submit those policies to the Inquiry.

CURRENT MATTERS

240. **I am asked to provide an overview of the current membership of the NFSP and the way in which the NFSP represents its members' interests as at the present day.**

241. There are approximately 11,500 sub-post offices across the UK (this excludes Crown Post Offices). These offices are operated by approximately 7,100 independent Postmasters, some of whom will have more than one Post Office, and also strategic business partners (e.g. WH Smith). The NFSP currently has 6,800 individual members who operate around 8,500

sub-post offices.

242. There has been a forest of issues that have impacted Postmasters during the period the Inquiry is considering. One such tree within that forest has been Horizon.
243. Today, Postmasters are extremely concerned about the security of their investment and their ability to generate a viable income from it. They do not see their income growing in line with inflation nor their costs.
244. However, reflecting on the whole period of the past, governance of the Post Office by Government and by the Post Office Board or Royal Mail Board is where the issue lies. Postmasters have simply not been treated as equals nor their investment respected. This has to change going forward and this is why the NFSP is proposing an Oversight Committee, discussed later in this statement, which would include Government, Post Office, representative bodies such as Unite, the CWU and NFSP along with consumer champions such as Citizens Advice, Age UK and Rural Services Network as examples. The whole point would be a body working alongside the Board ensuring the social purpose of the Post Office is being maintained.
245. The NFSP represents its members' interests by regularly writing to relevant MPs to outline the various issues affecting Postmasters and flagged to us as concerns by our members. An example of this is the letter to an MP on 12 December 2022 (see Letter to House of Commons from the NFSP re Current Network Issues 12 December 2022, **WITN00370125**) outlining various issues affecting the network, and therefore Postmasters, together with the NFSP proposed solutions where available. Key issues include:

- a) **Business Rates:** The NFSP's statistical analysis of our member surveys, remuneration surveys, and monitoring of the calls received from Postmasters indicate that business rates are a significant issue for Postmasters, with 70% of our members earning the equivalent of the National Minimum Wage or less. Feedback from our membership has shown that this is a significant and ongoing issue for Postmasters, as whilst they are providing a public service, they cannot afford to make a living. The NFSP had and continues to consistently flag this as an issue, as shown in various letters written to ministers such as this one, in DBT Working Group meetings (as outlined later in my statement), and through other avenues.
- b) **Relationship with the Post Office:** despite Post Office claims that they are keen to reset the relationship with Postmasters, our members reported that they did not feel listened to by Post Office in our membership survey (see NFSP Member Survey Results 2021, **WITN00370113**). The NFSP considers that Post Office need to be more aware of the issues affecting the network on the ground, in order to rebuild relationships with Postmasters.
- c) **Hard to Place:** the NFSP has written to the Inquiry previously outlining the issue regarding Hard to Place Offices. After the closure of the Network Transformation programme in 2018, if a Postmaster wanted to leave the network but a potential new postmaster cannot be located, Post Office places them on a Hard to Place register. If a potential new postmaster is found, the exiting Postmaster will get a leavers' payment. However, if a Postmaster has to close their office

due to ill health, age other reason before a potential new postmaster is found, they forfeit their leaver's payment. The NFSP considered that Post Office should pay the exiting Postmaster compensation in such circumstances. As demonstrated in later letters, whilst 26 months' compensation was offered initially by Post Office, this is no longer the case. We are therefore concerned that Postmasters are either forced to leave the network without a potential new postmaster in place, forfeiting their investment, or forced to remain open despite age, ill health, or running a Post Office that is no longer profitable. Added to the above, Post Office without agreement with the NFSP has withdrawn any funding that would have been available for any new PNP who may wish to take over one of the HtP offices and now expect the incoming PNP to fund £16,000 - £17,000 for a new post office counter making the proposition less attractive. This may make it more difficult for those communities to have a full-time, full service post office provision going forward.

- d) **Working Group:** the NFSP is part of a tripartite Working Group with Post Office and DBT, which is also a strategy that the NFSP uses to build relationships with key external stakeholders and represent the interests of its members. At this point, a key concern was that Post Office had not provided the NFSP with its future strategy so we can communicate this to our members. As our members are investors in the network it is important that they are informed about the Post Office's strategy, as this may affect their investment.

246. A more up to date example of the NFSP writing to MPs to inform them

about the issues affecting Postmasters is the Letter to Gareth Thomas MP (Minister of State for the Department of Business and Trade) with NFSP introductions and outline of key SPM issues 11 July 2024 (**WITN00370119**). Recently, Gareth Thomas MP was appointed as the Minister of State in the Department of Business and Trade. We wrote this letter to him outlining some of the key issues affecting Postmasters at this time. As above, low remuneration rates continue to be a considerable concern for members and cause them financial hardship. As explained in the letter, Postmasters are continuing on despite this financial hardship, as they are aware of the service they provide to the community. This is to their own detriment but to the benefit of the Post Office. The NFSP is calling for an urgent comprehensive remuneration review to address this. The NFSP continues to ask key stakeholders to consider and implement its Oversight Committee proposal in order to address issues with Post Office Governance (as further discussed later in my statement). As demonstrated in this letter, the NFSP is seeking to ensure that key stakeholders are aware of the issues reported to us by our members both through writing to and in seeking to meet and discuss these issues with them.

247. In relation to MPs, the NFSP now provides members with draft letters for them to send to their own MPs. The NFSP notes individual constituency MPs were influential in bringing the Horizon scandal to wider attention, and so has adopted this as a method by which issues affecting Postmasters are brought to the attention of a larger number of MPs. The NFSP is therefore using this as a method to make more MPs aware of issues affecting Postmasters. One example is the NFSP's Proposed Draft Letter from Members to their MP re

renumeration and Horizon Inquiry July 2024 (**WITN00370122**) where the issues are Postmaster renumeration and the Horizon Inquiry. Through doing this they will hopefully engage with the Government as a key stakeholder that way. Providing such letters may enable members to learn about the issue and make their concerns regarding issues commonly affecting Postmasters heard without having to figure out what to do by themselves.

248. The NFSP also used this method as part of our campaign regarding DVLA, as shown by the NFSP's Proposed Draft Letter from Members to their MP re DVLA and other issues July 2023 (**WITN00370112**). The termination of the DVLA contract was planned to happen in March 2024. This would have meant that over 6 million DVLA transactions, and the renumeration associated with that, would no longer be available to Postmasters. This is part of a larger pattern of the Government withdrawing face-to-face services, causing a barrier to people who have issues accessing online services, and decreasing Postmaster income from Government services to 5% of what it was in 2005. The NFSP campaigned against the proposed end of the DVLA contract. This campaign included writing to various MPs, including asking our members to write to their own MPs as demonstrated by this draft letter circulated to our members. The NFSP handed over the signed petitions at Downing Street regarding the campaign and brought along two Postmasters so they could ask questions and be part of discussions regarding this issue. As a result, the contract was extended to March 2025, and renumeration in relation to these transactions was increased.

249. The NFSP's Written Submission to Business, Energy and Industrial Strategy Committee re Post Office Network Inquiry 2020 (**POL00392930**) is

also an example of how the NFSP supports our members' interests. The NFSP brought in the response from the 2019 member survey (which I discuss later in this witness statement) into these submissions, so that it could accurately represent what members were concerned about in an informed way. Again, key issues include remuneration, concerns of Postmasters that they will have to close their Post Offices, asking for more services to be provided within branches for them to be sustainable, and changing the attitude of Government and other stakeholders to Postmasters. Many of the issues mentioned here have not been rectified, but the NFSP continues to bring these to stakeholders' attention.

250. We also represent our members' interests through the DBT Working Group. The Working Group is a tripartite meeting between the NFSP, Post Office and DBT. We use these meetings to discuss high level strategic issues and raise issues with Post Office and DBT that members have raised with us, where these fall within the category of high level strategic issues. At one meeting on 29 March 2023 (see Working Group Minutes between the Department of Business and Trade, POL and NFSP 29 March 2023, **WITN00370107**), we discussed concerns about declining footfall and the need to diversify services provided at post offices. These are common themes identified as issues affecting the network by the NFSP in our analysis of Postmaster concerns. There are occasions upon which we raise an issue and are told that this is for discussion on different occasions (e.g. in this meeting, in relation to Tim Boothman, Chair of the NFSP, raising concerns about the restrictive policies on Postmasters regarding what they can offer in comparison with other retailers). These are the meeting notes prepared by

DBT and shared with us after the meeting. These minutes outline the purpose of the Working Group in looking at high level issues and working together to identify problems and potential solutions.

251. It should be noted that in these minutes, Martin Roberts, Group Chief Retail Officer of the Post Office, informed the NFPS and DBT that the Post Office Board has signed off the joint Grant Framework Agreement between Post Office and the NFSP. To clarify, the amended Grant Framework Agreement was not signed by Post Office at this point, and at the point of writing is still yet to be signed.

252. In advance of the DBT Working Group Meeting on 12 July 2023, the NFSP asked members what concerns they would like us to raise at the Working Group meeting via our Facebook group. Responses included that the Post Office's non-disclosure of documents and the effect of that on this Inquiry, were of concern. I therefore raised this as an issue within this meeting and asked the Government to take a more active role as shareholder in holding Post Office to account (see Working Group Minutes between the Department of Business and Trade, POL and NFSP 12 July 2023, **WITN00370108**). The NFSP and its members are concerned that the culture of the Post Office has not changed adequately, and therefore we use meetings such as this to flag this to both Post Office and DBT.

253. Added to the support we are providing today is our Advocacy Representatives as described earlier in this statement. These trained individuals are present to support Postmasters where there is a potential breach of contract that could cause a suspension or termination of the Postmasters contract. The NFSP have also been calling for a Mediation or

Arbitration facility.

254. We are currently supporting Postmasters who believe they are victims of mis-selling by Post Office of the Network Transformation programme and has led to their financial detriment. At present 262 Postmasters have come forward on this and we are currently exploring the legal options on this issue and ultimately it is hoped this can result in full investigation into the activities of the Post Office during Network Transformation Programme and if this had a detrimental effect on Postmasters and the financial viability of their businesses.

255. As mentioned above, another important body of work we have been supporting Postmasters with is for those who are classed as Hard to Place. These are Postmasters who had the option to convert to one of the new models or leave the network under Network Transformation but for whom no Potential New Postmaster has come forward. In February of 2023, the Post Office without consultation imposed a change to their existing contract that was in our view and importantly, the view of the Postmasters, to their detriment. Post Office announced that these individuals would have their contracts terminated but only receive 12 months compensation rather than the 26 months they had been promised. In 2014, Postal Affairs Minister Jo Swinson MP announced to Parliament that £640m would be available to complete Network Transformation. Postmasters affected by this rightly asked where the money had gone. A freedom of information request was submitted on behalf of the NFSP via our solicitors to both Government and Post Office. This FOI was refused on grounds of cost and we have therefore been unable to establish how Post Office spent the £640m. At present, around 30

Postmasters will exit the business having each lost on average £43,000 in compensation. When we take into account the age of the individuals and the health issues some experience and how the Post Office have acted in respect of this group, we have an understandable question as whether this has been done in the arbitrary, irrational and capricious manner, of the type referenced by Fraser LJ in his Common Issues Judgment (**POL00113269**, e.g. at para 756).

256. Our understanding is that the decision not to provide 26 months worth of a leaving payment was made at Board level. We do not know how much involvement the two Non-Executive Postmaster Directors (NEDs) had in the decision but I did write to them on behalf of affected Postmasters. Although I received a holding response from Elliot Jacobs, I did not receive any further correspondence from either of the Postmaster NEDs (see Emails between Calum Greenhow and Postmaster NEDs Re_ Hard to Place dated 8 December 2023, **WITN00370128**).

257. **I am asked to summarise the nature and extent of the legal services or support (if any) that the NFSP provides to its members as at the present day.**

258. As described, above, via the Parliament Hill benefit management services business, free consultations with a law firm, covering property law, personal accident and inheritance planning is available to all members.

259. Today, as described earlier in the witness statement, we work alongside the solicitors of any Postmaster involved in a contractual dispute with Post Office to enable as sound a defence as possible.

260. We are aware that through a Postmaster's own public liability or business insurance, they may also have access to legal support of various kinds.
261. As mentioned earlier in the witness statement, the NFSP does not have and has never had an inhouse legal team or external solicitors contracted to provide legal services for members in respect of criminal prosecutions or civil court actions. Today, we would refer members to appropriate firms of solicitors where they have not been able to obtain cover through the free legal advice scheme or via their insurers.
262. **I am asked to provide an overview of the processes by which SPM's concerns and grievances are reported, recorded and monitored by the NFSP as at the present day.**
263. As discussed earlier in this witness statement, there are new policies and procedures coming into place regarding complaints and whistleblowing. I set out the way in which these issues were dealt with in paragraphs 234 - 237.
264. As discussed earlier in this witness statement, in light of Fraser LJ's judgment in 2019, the NFSP conducted a review of its structure and processes, and identified that issues reported by members at a branch level were not necessarily being escalated, collated and thematically analysed by HQ. Therefore, if there were trends in issues arising, HQ may not previously have had an accurate view of these.
265. To address this issue with information flow, the NFSP has put in place a process by which representatives monitor are report back to HQ regarding

the issues that are raised with them by members. The NFSP asks all Branch Secretaries, Regional Secretaries and Regional Non-Executive Directors to send in information on a weekly basis detailing issues which Postmasters have raised with them or sought support on. This is collated and we discuss each case recorded in the month and if there are any patterns or anomalies, we would take that to Post Office to be discussed. The NFSP's Public Affairs Manager collates this information into a spreadsheet such as the NFSP Public Affairs Manager Spreadsheet with Monthly Overview of SPM issues to June 2024 (**WITN00370124**), which shows what issues are being raised most frequently, how this changes over time, how the type of office or source of report correlates with the type of issue reported etc. This spreadsheet is the Monthly Overview, or Directors Log for this year. This year, the most common issue that the NFSP has been contacted about is the HSS, however the number of calls regarding this per month have been decreasing.

266. We then use this data in a presentation to the NFSP Board, for example NFSP Public Affairs Manager Report to NFSP Board re issues affecting Postmasters March 2024 (**WITN00370109**). This is so that the Board are aware of the common issues being reported by our members. This also includes information gathered in our remuneration survey of members, from HR4UK and members survey when these are carried out. The presentation shows the NFSP's relationships with key stakeholders and political efforts, and the different methods the NFSP uses to support members and how the NFSP is developing and managing relationships with key stakeholders through meetings, such as discussions about the Oversight Committee, attending debates, and providing briefing notes to MPs.

267. Data collected is also reported back to our members through a graphic in the Subpostmaster Magazine (an example of this has been provided to the Inquiry – see Subpostmaster Magazine Graphic re results of member survey April 24, **WITN00370123**). We think it's important that Postmasters have an understanding of the common themes and issues affecting other members and reported to the NFSP, so they are better informed about these. The graphic provided to the Inquiry shows that Horizon, Post Office governance and Network Transformation continue to be issues about which Postmasters feel strongly. In particular, it is important to note that 99% of Postmasters responding to our January and February members survey, when asked "Regarding a change in Post Office governance via the NFSP's proposed Oversight Committee, do you agree there is a need for change in PO governance" answered yes. 98% felt there was a need for a change in culture of Post Office and the way it deals with Postmasters and the network.

268. Examples of areas we have addressed as a result of the collation of this information include:

- a) Covid – During Covid, the NFSP led from the front during this time of crisis, hosting Teams meetings 7 days a week providing Postmasters with the latest information on furloughing staff, Government grants, social distancing guidelines and access to masks and hand gels. Thousands of Postmasters joined our Regional and national calls providing them with updates.
- b) Miskeys – this was a problem over long period affecting many Postmasters which they regularly raised with us. Post Office saw miskeying as falling into the category of error by the Postmaster in

terms of the contract. We raised this with the Post Office and pushed them to add another step into the Horizon process which has changed the colour of the deposit icon so that there was a clear differential between that of a withdrawal, which was a common miskey issue arising. This has saved Postmasters' significant losses as a result.

- c) Flip-top Tills – Postmasters regularly raised this issue with us. These were installed during the Network Transformation programme, when offices became more open plan. The till was incorporated into the counter with a secure lid. The flip top till is coming to the end of its life and Postmasters were being charged a great deal of money for repairs. We worked to have this changed so that these costs are now incurred by Post Office.
- d) New Network Locations (White Space) – Despite the majority of Postmasters having to convert to one of the Mains or Local models, Post Office then began in 2017, a programme of extending their network. This placed financial pressure on the neighboring offices. The NFSP lobbied for a joint panel where these new outlets would be located and were successful in ensuring that around a third were not opened as they would have a detrimental impact on a neighboring office.
- e) Onboard/Offboarding – This is when there is a change in the Postmaster. For anyone taking on a Post Office, the process is lengthy and time-consuming with some Potential New Postmasters deciding against partnering with the Post Office during this process

as a result. This team was consistently under resourced. However, after much lobbying by the NFSP, Post Office have increased the staff levels and the process seems to be running smoother

f) Membership Survey – we considered that it was necessary for the NFSP to survey our members to help inform us about the issues affecting the members, to ensure that we were aware of and properly representing members in relation to issues affecting them. We therefore carried out a previous survey in 2019 (as discussed in the NFSP Report of Meeting of the Council on 17 and 18 June 2019, **NFSP00000464**), and a survey in 2021. 1,001 Postmasters responded to the latter. The results of this (see NFSP Member Survey Results 2021, **WITN00370113**) have informed and been used in our approach to raising issues with key stakeholders as evidence of widespread concerns about various issues. In 2019, we found that 22% of Postmasters thought they were going to close/ downsize within the next year, which dropped to 12% in 2021. Slide 6 demonstrates how Postmasters felt about the issues regarding the relationship between them and Post Office, and their concerns about the current reliability of Horizon. The NFSP then took these issues forward, as shown in the various letters referred to, the Minutes of the Working Group, and various discussions with key stakeholders. The NFSP also used this survey to understand what the members want from the NFSP, so support and representation to our membership can be better focused and tailored, as shown by slide 15.

g) Annual Conference - The NFSP annual conference is method by

which the NFSP both informs its members and is informed by its members. It is an opportunity for members to attend the NFSP Annual General Meeting, attend exhibitions about relevant matters and, importantly, ask questions and raise concerns. The NFSP Conference Programme 11 – 13 May 2024 (**WITN00370116**) shows that this year, I, Kevin Hollinrake MP (the Postal Affairs Minister) and Nick Read (the CEO of POL) were part of a panel discussion at which they were asked questions from Postmasters. The NFSP considers it important to provide our members with the opportunity and forum to ask such questions and get answers directly from high-ranking members of the NFSP, Post Office and government.

269. **I am asked to describe the nature and extent of any support the NFSP offers to SPMs in relation to (a) raising concerns about the Horizon IT System or related training and support services, (b) the conduct of branch audits, (c) investigations into alleged shortfalls in branch accounts, or (d) civil or criminal proceedings against SPMs arising from alleged shortfalls in branch accounts, as at the present day. I am asked how is that support organised by the NFSP.**

270. As discussed earlier in this witness statement, we now have the Advocacy Representatives who have received particular training on representing Postmasters facing these issues. Also as discussed earlier, there is the free legal advice service available through the Parliament Hill benefit management services contract. As mentioned, where there are criminal prosecutions and/or civil recovery actions, we will refer the affected Postmaster to solicitors' firms who may be able to assist or recommend they

contact their own solicitors. The NFSP does not provide direct or paid for legal services to members.

271. Additionally, Postmasters can raise issues in relation to Horizon directly with the NFSP, through their Regional representatives or through our social media channels. An example of this was in January of 2021 where Postmasters had issues in relation to the revaluation of their postage stamps due to the price increase. Postmasters went onto the NFSP social media groups and highlighted they had an issue. This was picked up by the NFSP, collated and taken to Post Office for a resolution.

272. The NFSP receives information from Post Office on a monthly basis under Service & Support. This report provides an anonymised account of the number of transaction corrections, percentage of offices carrying out their Overnight Cash Holdings (ONCH) and also how many risk based audits took place. For example in 2023/2024 there were 340 risk-based audits across the network with an average discrepancy of £93.3k. However, of those 340, only 31 came to the NFSP for help via the Advocacy Representatives. My concern is that the Postmasters who have not come to the NFSP may not be receiving the help they could, nor do we have full insight into the quality of these Branch Assurance visits.

273. Where the NFSP is asked for help, our goal is to ensure that Post Office is respectful, helpful in terms of providing full access to any information, carries out a full and thorough investigation and is understanding in terms of any conclusion. In terms of an investigation, Post Office must answer the three questions of

a) Is it computer error?

- b) Has someone made a mistake and why?
- c) Have the funds of the Post Office been used in the manner they are not intended and by whom?

274. If Post Office cannot answer these questions factually, then the Postmaster should not be held to account. Some of these cases are very complex and are being dealt with by the relevant Police authorities.

275. Where there are any criminal prosecutions and civil actions, the NFSP will support the Postmaster and their solicitors in the legal defence of the case by providing information and guidance on how Horizon works or Post Offices polices and processes. We are aware of four cases that have taken place where the NFSP has provided support to these Postmasters. One has concluded with the successful exoneration of the Postmaster in court and three are ongoing at present.

276. **I am asked to describe my working relationship with the current POL Executive Team and others in POL with whom you have a relationship. In answering this question, I am asked to set out the frequency of any meetings and the way in which I consider them to be approached.**

277. I would say the relationship between Post Office and the NFSP is very strained at this moment. An example of just how the leadership of Post Office are treating Postmasters, including the NFSP, can be summed up in a recent meeting on the 29th of May this year. In this meeting was the CEO, the Deputy CEO, Chief Retail Officer, Chief People Officer and the Chief Technology Officer, where the NFSP were asking about NBit (Horizon's

proposed replacement) and we were provided with an update. However, the following day Computer Weekly broke the story that NBit was unachievable. Whilst we knew it was running late and over budget, at no point in the meeting of the previous day were we told it lacked quality according to auditors for the Department of Business & Trade or that Post Office had asked for nearly £1bn in cash to fund the project or that the Infrastructure and Projects Authority were now involved or that the project had been brought into the Government Major Projects Portfolio. There is still a significant lack of transparency and openness. Trust in the senior management and the Board of Post Office still does not exist from the Postmaster or the NFSP's view point.

278. Another example is from earlier this year. In January, the NFSP met with Postal Affairs Minister Kevin Hollinrake MP and Post Office via the Department of Business and Trade (DBT) Working Group. At the meeting the NFSP were putting forward the Oversight Committee as a way of improving the governance of the Post Office. The Minister asked both the NFSP and Post Office to go away, discuss and come back with a workable proposal. At the subsequent meeting which took place in the February, the former Chief Retail Officer for the Post Office, Martin Roberts, made it very clear in his opening words that Post Office was not interested in any changes to its governance structure. I had to remind the former Chief Retail Officer, that as an employee, it was not their place to go against the wishes of the Minister. I have to say that discussions about the governance of the Post Office are now taking place. I do believe that before any decision is made, Postmasters and employees of Post Office need to be consulted.

279. However, it is important to note that there are those within Post Office who do have an open and transparent mindset. We have been greatly encouraged by those within Branch Technology team. There are others within the Audit/Branch Assurance teams who are looking to be more collaborative. We are disappointed that the Security Team has been renamed as Network Crime & Risk Support Team as it suggests an optical blindness within Post Office given everything that has occurred it looks like there is a focus on crime within the network.
280. On a day to day basis, I would engage most with Shaun Kerrison, who is Head of Post Office Engagement. I would also engage with Tracy Marshall (Network Development Director) and Martin Edwards (Network Strategy & Development Director) at least on a monthly basis and ad hoc as required to deal with matters pertaining to the network and remuneration. I would meet with Martin Roberts (Chief Retail Officer) on a quarterly basis and Nick Read (CEO) once or twice a year.
281. At this moment it rather looks like the ship is rudderless. The CEO, Nick Read, is not dealing with day to day issues as he is concentrating on the Inquiry, the Deputy CEO, Owen Woodley, is leaving at the end of August, the Chief Retail Officer, Martin Roberts, has left the business suddenly, the Group General Counsel, Ben Foat, is absent during a significant legal crisis for the business, the Chief Financial Officer, Alisdair Cameron, has left the business with a £1.2m settlement and the previous Chair, Henry Staunton, was sacked. Added to this, anyone new coming in as part of the leadership team has the title of "Interim" at this point. Therefore, from a stability and continuity perspective, it does not look good. Postmasters are rightly

concerned about the direction of the business and how this may impact the security of their investment.

282. **I am asked to describe the culture of the NFSP and set out your reflections as to the ways in which the culture has or has not changed following the findings of Fraser LJ in the Common Issues Judgment and/or the evidence arising in the Inquiry.**

283. The NFSP is made up of two parts. There is the employed staff based in Shoreham-by-Sea and then there is the membership, which includes the volunteering Branch & Regional officials. As the Chief Executive, I am responsible for the workplace culture and the way in which the organisation treats and deals with its employees. Distinct from the employer/employee relationship, there is the wider membership of over 6,800 members. While the NFSP cannot dictate how each individual postmaster behaves, what the Chief Executive and the Chair of the Board have is a responsibility for is the culture in the way in which members will be dealt with and the way in which the NFSP will represent the interests of its members.

284. When I came in as Chief Executive I wanted to change the way in which the previous leadership had operated. For myself, I wanted to be more collaborative and operate as a team. I felt it was important to look at how challenge could be made and dealt with.

285. In seeking to improve the culture of the NFSP for and with its members from 2018 onwards, we have introduced the following Mission Statement:

- a) Our Vision - The collective voice of post office operators offering members representation, support and solutions to realise the full

potential of their businesses.

- b) Our Mission – to be a membership led organisation, supporting members to operate post office and retail outlets. We represent their interests at every level of policy and decision making. We offer an opportunity to belong to, and take part in, a community working together for a more successful future.
- c) Our Values – Member-focused, Trusted, Knowledgeable, Respectful and Supportive.

286. Examples of initiatives we have introduced since 2018 include:

- a) Culture Committee – At this year's Annual Conference (see this year's Conference Programme, **WITN00370116**), the NFSP welcomed Darren Burns from Timpson's who outlined the culture within the Timpson's Group. One such aspect Timpson's operate is a Culture Committee of employees to help the management ensure that Postmasters are treated with respect and that the business is deemed to be a good place to work. The NFSP has just launched the recruitment process for our own Culture Committee from within the network, as seen in the NFSP Newsletter to Members 15 August 2024 (**WITN00370111**). Any member can apply and the aim will be to have 10 Regional members of the Committee. Members from within those Regions will vote for who they want to be the Regional Representative. Once the Committee is decided, we will sit down and decide what key areas it will focus on to begin with. We expect an employee of the NFSP will also be on the Culture Committee so that there is unity across the whole organisation. I don't want to be

prescriptive about what this Culture Committee looks like, or dictate what it is going to say and do, I want to work with the Committee on the issues which it determines is its key focus.

- b) Part of last year's and this year's annual plan is to link NFSP Board Directors with Product Directors and Managers within Post Office. Connected with the NFSP Directors will be a small group of Postmasters who along with the NED Director work with Post Office to improve an understanding of how these products actually work on counter. This brings greater transparency and involvement to the Postmaster network something the NFSP have advocated for some time.
- c) We have developed regional WhatsApp groups and a Facebook page to enable two-way discussions and peer to peer support. There is now weekly newsletters sent to over 4000 members who subscribe to that service. After each Board meeting, I hold a national call to update Postmasters on what is discussed so that they can feed in their thoughts and ask questions. Each month, we conduct a remuneration survey and ask Postmasters for their views on a variety of topics relevant to the network. The results are fed back to members via The Subpostmaster magazine or the weekly newsletters.
- d) Wellbeing Overview – in May 2019 the NFSP signed MIND's Time to Change Pledge committing us to focus on the mental health of our employees and members. As part of this we have regular meetings with Post Office as the NFSP is trying to work with Post Office (with

Postmaster input) to try to improve the culture of the wider network, which includes the Post Office employees. This is to provide wellbeing support to Postmasters and trying to develop the relationship with Post Office so that they also are contributing to the improvement of network culture and are treating Postmasters with respect. As demonstrated by the NFSP and POL Wellbeing Overview Spreadsheet 24 July 2024 (**WITN00370117**), since 2019 the NFSP through its specially trained personnel have been training and promoting Mental Health Champions and First Aiders, along with providing a Mental Health helpline, providing Advocacy Representation, providing confidential support through HR4UK and other initiatives to assist employees and Postmasters with their wellbeing and provide them with support. We are working with Post Office to promote World Mental Health Day on Thursday 10th October this year. The NFSP has worked hard on this particular initiative because we recognise the pressure of running your own small business can have, where isolation, financial concerns and relationships with the Post Office can all take their toll.

287. The NFSP firmly believes that when it comes to any changes or developments within Post Office that impact the network, Postmasters should be fully consulted. The difficulty arises because we find the Post Office cannot bring themselves to lose that level of control over any changes. The NFSP seeks a protocol that would enable us to engage with the Postmaster network, explain the change and how that impacts Postmasters, gather the feedback so as to proactively negotiate with Post Office to ensure that a

pragmatic consensus can be agreed.

288. **I am asked to summarise my understanding of the actions the NFSP has taken to change the culture of the organisation following the findings of Fraser LJ and/or the evidence arising in the Inquiry. I am asked to set out my reflections on how effective these changes have been.**

289. It is difficult to evaluate how effective all these measures have been as some are fairly new or are at the inception stage. In addition, during the time I have been in the Chief Executive role, there has been the impact of Covid and the ongoing efforts in dealing with the Post Office on a day to day basis. Even where we have or are managing to develop our own culture, it is difficult having to deal on a day to day basis with an organisation – the Post Office – whose own culture needs to change, and despite everything that has come out at this Inquiry, we don't find any real change in culture to date.

290. In order to develop an understanding of this, as the Inquiry has progressed, I have encouraged my fellow Board members and my employed colleagues to attend the Inquiry so that they could experience for themselves the true implications of what the Inquiry is covering. My hope is that the experience of what they see, hear and learn will never leave them and influence positively my desire to change the overall culture of the NFSP so that the totalitarian culture of the past, does not and cannot exist in the present or tomorrow.

291. When the BEIS Select Committee that took place in 2020 was looking into the Horizon issue, I felt it was important for the victims to hear a different message from the NFSP than before, and so I said sorry to them at that

Committee. Since then, the NFSP has continued to be public in its apologies to those victims who did not receive the support they required. We recognise that improvements need to be made in how Post Office listen to representative bodies and in a far more open and transparent manner. However, it is important that all the representative bodies involved, take a look at themselves as well to see where they need to improve.

292. **I am asked does the culture at the NFSP support the building and maintaining of trust between the NFSP and SPMs?**

293. I am asked about the culture of the NFSP in supporting the building and maintaining of trust between the NFSP and its members. From the NFSP perspective of today, our main focus is on encouraging unity as there are serious threats to the viability of the Post Office network looming and if we are divided, then it will ultimately be to the detriment of Postmasters and the communities we serve.

294. As discussed earlier in this witness statement, we have set up Regional WhatsApp groups and a Facebook group to provide peer to peer support. While we have worked hard on the culture of the organisation and to ensure the relationship with and for the members, sadly, I am regularly contacted by Postmasters who tell me that they do not engage with the WhatsApp group due a toxic or negative environment which has been created by a small number of members and former members who feel the NFSP has not done enough for them. There are also examples of some of our Postmaster and employee colleagues being pursued with relentless requests for evidence, often when this has been provided and it has become a form of harassment which causes stress. I understand this type of trolling is termed 'sealioning'. I

can understand that there are and will be members who feel that the issues of their declining income and reduction in value of their investment cause upset and anger, however, posts which cause the wider membership not to engage with our social media does have an effect on the culture, as they feel this tone does not reflect them and they can end up feeling intimidated. The NFSP is working every day on issues of remuneration although this will not always be enough to keep all of the membership happy all of the time. When we have tried to ensure that posts are done in a kind and courteous manner and also during reasonable working hours, there are calls that the NFSP is trying to shut down freedom of speech. This social media issue is having a mental health impact on both employees and membership and in my role as Chief Executive I have a duty to the well-being of the NFSP's employees, members and elected/voluntary officials. I am conscious that the NFSP is not the only organisation facing this kind of social media problem and the effect on well-being of others who receive, read or are part of WhatsApp groups, for instance, MPs have faced a huge increase in negative social media and many decided to stand down at the last election because it was too much for them and their families.

295. I have been asked separate questions about membership of the NFSP and these include describing the process by which applications for membership with the NFSP are assessed, including who is involved in reviewing any such applications and how a final decision is communicated to the applicant; the criteria used to assess an application for membership with the NFSP; where an application is refused what processes exist for the applicant to appeal such a decision and if such a process does not exist, why

that is; and have any applications for membership with the NFSP been refused since the beginning of this calendar year, how many applications have been refused and the reasons for any such refusals.

296. We have a Membership Officer who processes applications that are submitted to the NFSP. In terms of new incoming Postmasters to the network, as mentioned earlier in my statement, these Postmasters are written to by the NFSP to ask if they wish to join. If they do, then these applications are processed by the Membership Officer and accepted with a Welcome Pack being sent out which sets out the membership benefits. There are instances of Postmasters leaving the network and as a result they are removed from the membership list. There are also some instances where a Postmaster feels they no longer wish to be a member of the NFSP and they will communicate this, rescinding their membership and they are then removed from the membership roll. On occasion, a member who has left the organisation may later apply to rejoin.

297. In answering these questions, I have included them in this section about culture as we have refused one application for membership in this calendar year and that relates to the issues I have been discussing above. The starting point for membership assessment is in accordance with Article 8.1 of the Articles of Association (**NFSP00001051**) which says that anyone who holds a contract to operate as a Postmaster may be a member. This means that you must be a Postmaster to be a member but membership is not compulsory or automatic if you are one.

298. If there is to be a refusal of membership that is done under Article 9.3 of the Articles of Association which say the Council (the Board) may in its

reasonable discretion decline to accept any person as a member and need not provide its reasons for doing so. There is no process of appeal for an applicant whose application is refused under Article 9.3. This is because there is nothing in the Articles of Association which allows for this.

299. In this calendar year, one application was refused. This is the only application I am aware of being refused since I came into post as Chief Executive. This application came from someone who had previously been a member of the NFSP. I have highlighted above the behaviour of some on social media, whether by members or former members, and the mental health impact of that on our employees and Postmaster members. Based on the application of a former member, the Board took the difficult decision as per Article 9.3 to refuse the application. By way of example, the administrator of the relevant Facebook group and also one of our employed officials contacted me about the impact some social media posts had had on them, feeling they could not look at posts due to that impact. The application which came used what we understand to be pseudonym, in other words not the actual full name of the applicant. The Board, taking this kind of information into account and taking account of its duty of care to existing employees and members, made the very difficult decision to refuse membership (see Email from Lisa Harmsworth to Calum Greenhow re denied membership request dated 13 March 2024, **WITN00370127**).

300. In terms of other matters relating to the effect of cultural change, with the plans we have in place in linking NFSP Directors with groups of Postmasters, promoting specialisation in product areas and engaging with Product Directors of Post Office, we believe this will enable more

Postmasters to understand the challenges and complexities of running a business the size of the Post Office. Importantly, it will enable Postmasters thinking to be involved at every level within Post Office.

301. Later in this witness statement I discuss the NFSP's proposal for an Oversight Committee which brings Government, Post Office and consumer champions together we can work collectively together for the good of the business and the communities we serve. We believe such an Oversight Committee would have a positive effect overall on the culture of the whole network.

302. **I am asked to summarise my understanding and experience of the board's relationship with other key relevant external stakeholders, such as the CWU, UKGI and the Department for Business and Trade ('DBT') and any way in which this affects the NFSP.**

303. The Inquiry is asking about three distinct groups and I will answer in relation to each below

- a) The CWU – The CWU is the recognised representative body of Post Office employees in Crown offices, Cash Van in Transit, Auditors and Contracts Managers. This the NFSP respects and is supportive of. The interests of employees such as those in Crown offices which the CWU represent are quite different from those of self-employed small business owners and retail operators who are almost always employers themselves, and it's possible for a Postmaster's employee/s to be members of the CWU. This inevitably means that while interests of our two organisations will align on some aspects of the wider Post Office network, this will not always be the case. The

NFSP takes the view that where those interests align, we should be working together for the benefit of our respective members in holding Post Office to account. This can and should be in a collaborative manner, such as the 2009 proposal regarding PostBank, rather than being in opposition to each other and debates on social media over which organisation is the better one.

- b) UKGI/DBT – Whilst I meet with UKGI on a monthly basis and the DBT Working Group three times a year, I would prefer a more two-way discourse, looking at resolving the issues that affect the network. The “arm’s length body” aspect of the past provided Post Office with the ability to deflect and misinform, and this has to change. This also has to apply to the Department of Business and Trade. Its way of working has also allowed politicians to have the “get out” of plausible deniability and thereby absolve themselves of accountability. From the Inquiry evidence, we have heard much about behind the scenes discussions on the Post Office and its network, where decisions are being made which impact the viability of a post office without proper input from the Postmaster network. In our view, Government and its officials need to have at the forefront of their minds that Postmasters invest their own money into the network to ensure there is a service available in communities across the country. Without the investment of Postmasters, there would not be a network as large as it is. At present, it feels too often like a tick box exercise than a real interest in aspects that affect Postmasters. There should be agreed protocols put in place between the NFSP, UKGI and DBT to ensure that the

owner (Government) and their de facto business partners
(Postmasters) can work collaboratively and constructively.

- c) Royal Mail – though not referred to in the question asked of me by the Inquiry, another key stakeholder that the NFSP has regular engagement with to support our members and represent their interests is Royal Mail. The Letter to Simon Thompson (CEO of Royal Mail) and Keith Williams (Chair of Royal Mail) from NFSP re remuneration 22 July 2024 (**WITN00370118**) is an example of this. This shows how the NFSP is trying to engage with Royal Mail as a key stakeholder to try to ensure that Postmaster remunerations (which has been flagged by members consistently as a key issue affecting Postmasters) do not decrease.

304. This is why the NFSP is proposing the Oversight Committee as it will be a way for the CWU, Unite, the NFSP, Government, Post Office and consumer champions to work together to ensure that services of general public interest (SGPI) are maintained and available in communities across the country via the Post Office network.

305. My concern is that decades of decisions at Government level and within Post Office has diminished the network. Of the futures I can see, one that looms large is another network restructure, where there will be around 4000 outlets that we would recognise as a Post Office and over 20,000 Drop & Collect outlets. This would save Post Office significantly in terms of license fees and hardware costs for NBit plus it would reduce the costs in stock and cash held in branch.

306. **I am asked to consider the Times article dated 19 February 2024**

(News article from The Times titled 'Postmasters on Post Office board 'ignored and unwanted', RLIT0000201).

307. I am asked to set out in detail my understanding (if any) of the matters raised in this article, including the relevant background, chronology and actions of any individuals involved. I am asked to describe my working relationship with Elliot Jacobs and Saf Ismail.
308. Sadly, it did not come as a surprise at all that the article describes the attitude embedded in the Post Office towards Postmasters as one of being guilty and on the take. What is disturbing though is to find that even after all this time and the Inquiry hearing so much evidence from the past about the attitude of investigators, auditors and others within Post Office that this is still the attitude today. There is also the point raised about the present Chief Executive describing some employees as being 'untouchables', and I have to wonder what exactly this means.
309. The article describes a feeling of being "ignored and unwanted" or "seen as an annoyance". This is in reference to today, not the past. This I can very much relate to, along with the level of obfuscation there is when you try to deal with Post Office. What I take from this article and in my experience, regardless of the Postmaster NEDs being on the Board, it just feels very much as if Post Office is working to undermine any threat to their dominance and maintain control rather than truly resetting the relationship with Postmasters. This is very much what the NFSP has found is the way we are treated whenever we challenge Post Office.
310. Prior to the Inquiry asking for my witness statement, I had been reflecting on the last three years that Saf Ismail & Elliot Jacobs have been

Postmaster Non-Executive Directors on the Post Office Board. Whilst I do believe we want the same things, the NFSP has a concern there has not been a proper process put in place for the two Postmaster NED's and the NFSP to meet and discuss matters affecting Postmasters. The way in which this has been set up by Post Office does not feel collaborative. I therefore placed an official request in June this year to Post Office for that process to be set up. That is not in place yet.

311. I do have concerns about a current Postmaster being a Non-Executive Director of the Board due to potential conflicts of interest under the Companies Act 2006. The Directors of the Post Office Board have a duty to act in a way they consider, in good faith, would be most likely to promote the success of the company for the benefit of its members as a whole. However, Postmaster NEDs will have the same duty in relation to their own companies and those two interests could conflict, for example, remuneration where I understand the Postmaster NEDs will register their interest and abstain from voting.

312. As well as the conflict of interest question, Post Office itself recognises that the Postmaster NEDs are not independent members of the Board and, if for example there was to be an increase in the number of Postmaster NEDs on the Board, then the number of Board members would have to increase in order for Post Office to comply with their Articles of Association that the majority of Board members are independent. This was why the NFSP in October 2020, decided that no existing NFSP Board member should apply to be a Postmaster NED on the Post Office Board.

313. To be clear, this is not calling into question the integrity of the individual

Postmaster NEDs, rather it is to highlight the issues that can arise from this particular decision to create these positions on the Board. These issues also highlight why the Oversight Committee which we are proposing is, in our view, the better solution.

314. **I am asked to consider:**
- a) **NFSP00000713 (the email requesting legal advice dated 28 March 2019);**
 - b) **NFSP00000464 (NFSP council meeting minutes dated 17 and 18 June 2019 – in particular page 26);**
 - c) **NFSP00000497 (NFSP council meeting minutes dated 14 and 15 October 2019 – in particular page 19);**
 - d) **NFSP00000716 (the email exchange dated 28 November 2019).**
315. **I am asked to provide an overview of any discussions between NFSP and POL in relation to proposed amendments to the Grant Framework Agreement following the handing down of the Common Issues Judgment. I am asked to provide details of any amendments that were under consideration and clarify whether any such amendments have now been implemented.**
316. As discussed earlier in my witness statement, the NFSP recognised that this was an opportunity in light of Fraser LJ's ruling to seek the removal of clauses within the Grant Framework Agreement that were preventative in us helping Postmasters in the ways they needed. We therefore asked our solicitors to review the GFA and Fraser LJ's ruling and for their legal advice on what changes should be made in the light of the ruling.

317. Post Office provided the NFSP with a note of novation. The legal advice we received said this did not address the specific clauses which were raised by Fraser LJ at paras 590 and 596 of the Common Issues Judgment (**POL00113269**). These related to clauses 5, 17 and 26. The advice we received is that the GFA would require significant alteration to comply with the Common Issues judgement.

318. The amended note of novation (see Draft deed of variation of grant framework agreement, **NFSP00001082**) prepared by our solicitors was presented to the October 2019 NFSP Board and approved prior to it being sent to Post Office for consideration. It has taken the best part of five years to get the Post Office to the point of agreeing some of the changes we were proposing. In December 2019 Nick Beal informed us that the revised changes proposed by our solicitors was still in the hands of the Post Office legal team. Almost a year later in November 2020 things had not moved on and the GFA was still sitting within the Post Office legal team. Thereafter, things do not appear to move forward until October 2021 when it becomes clear there is a blockage in the Post Office. From discussion with Shaun Kerrison in October 2021 he explained to me that Post Office couldn't move forward with the GFA amendments until both parties had agreed the core purpose and metrics. The core purpose being negotiate, challenge, represent and support, as explained earlier in this witness statement. To get Post Office to agree to this was protracted, as they did not want the NFSP to support Postmasters in the whole of their business where Post Office services were being provided. As mentioned earlier, nor were they willing to have the term "good faith". We felt, in light of PO's actions over the GLO, it

was imperative going forward that in all their dealings with Postmasters, good faith was central.

319. The issue of good faith was a central tenet of Fraser LJ's Common Issues Judgement (**POL00113269**). It was therefore important that, given the NFSP is run by Postmasters for Postmasters, the Post Office was willing to act in good faith when dealing with the NFSP. We proposed that the term 'good faith' be placed in the recitals section, but this was also rejected by Post Office. The reality of the Post Office refusing all attempts to include this tenet in the GFA gives voice to concerns that, culturally, Post Office has not changed and that there is an unwillingness by the Post Office to act in good faith towards the NFSP and therefore our Postmaster members.

320. By August of 2023, we finally reached a place where we could agree the GFA and so I presented the revised GFA to the Board of the NFSP, who approved it and confirmed with the Post Office that NFSP were willing to proceed. The GFA, then slipped into the black hole that the Post Office have and despite several emails to Tracy Marshall asking where the Post Office was with it, I did not receive a satisfactory response. Therefore, on March the 15th this year, I emailed Shaun Kerrison to invoke clause 31 and escalated the process to try and bring about a finality to the revision of the GFA. As I write this witness statement, the GFA has not been signed but is about to be. This is more than 5 years since the Common Issues ruling and a third of the period that the GFA covers.

321. Although we have now managed to achieve an updated GFA, as discussed earlier in my witness statement this has taken several years and there is now only five years of the GFA contract left. The NFSP has

therefore taken the necessary step, following discussions at Board level and presentations to the membership, to instruct Grant Thornton to look at the future of the NFSP beyond the GFA and what possible commercial strategy alternatives are open to the NFSP, as demonstrated by the Letter of Engagement between NFSP and Grant Thornton 4 July 2024 (WITN00370120). This is to ensure that the NFSP has the best commercial strategy possible in order to support its members. The scope of the work instructed is at Appendix A of this letter. The work commenced on 12 August 2024 and is estimated to take 12 weeks. The views of the Post Office will be sought as part of this exercise as they are de facto business partners of Postmasters, however, the views of Post Office are not determinative in this exercise. It will also be an important part of this process to hold interviews and discussions with stakeholders, such as Postmasters in order to inform which options are aligned with their interests.

322. I reflected on all of this, having been present at a John Lewis Council meeting on July the 4th, 2024, I witnessed a Board, Group Executive and representative body working together for the common good of the business. I firmly believe that with the right culture present within Post Office, the NFSP and the Postmasters network, we can have a productive and collaborative working relationship for the common good of all concerned.

323. **I am asked to consider:**

- a) **POL00088885 (the email from POL to the NFSP attaching internal SPM support policies dated 26 May 2021);**
- b) **POL00088886 (POL internal SPM support policy - Post Office Audit Opening Script); POL00088887 (POL internal SPM support**

policy – A Short Guide to the Audit Reporting Tool);

- c) **POL00088888 (POL internal SPM support policy – Audit Closing Script);**
- d) **POL00088889 (POL internal SPM support policy – Postmaster Contract Suspension Policy);**
- e) **POL00088890 (POL internal SPM support policy – Postmaster Contract Termination Policy);**
- f) **POL00088892 (POL internal SPM support policy – Postmaster Termination Decision Review Policy);**
- g) **POL00088893 (POL internal SPM support policy – Network Monitoring and Audit Support Policy);**
- h) **POL00088894 (POL internal SPM support policy – Postmaster Account Support Policy);**
- i) **POL00088895 (POL internal SPM support policy – Postmaster Contract Performance Policy);**
- j) **POL00088891 (POL guidance for SPMs - Postmaster Guide to Policies);**
- k) **POL00088896 (POL responses to NFSP questions on SPM support policies).**

324. **I am asked to provide an overview of any further discussions between the NFSP and POL about POL's internal SPM support policies.**

325. These policies are a huge step in the right direction as this was not in place prior to the court case. The Audit Reporting Tool (ART) and the Audit

Rational Document (ARD) are very important documents that Post Office will make available on request. This is something they would not do in the past.

326. However, we have raised concerns about the Audit Reporting Script, we did suggest an alternative script which the Postmaster or OIC would be required to sign with a copy retained by the Postmaster. Part of the opening script informed the Postmaster or OIC, that the NFSP was available for help and support. Additionally, we suggested a checklist for the Postmaster and OIC to follow given the potential stressful situation that may be being dealt with. This would enable notes to be taken for reflection afterwards. Sadly, this was rejected by the Post Office on a number of occasions.

327. In relation the termination policy, we raised our concerns about the Decision Review Panel as we were concerned that Post Office were bringing current or former Postmasters into a position where they were deciding on the potential future of their colleague or former colleague. This we felt was potentially placing these individuals in a place of undue accountability. Added, the panel would consist of 2 senior Post Office employees, a non-voting Chair (also a Post Office employee) and one Postmaster, where the majority decision would take precedence. We felt that it was unlikely that two senior Post Office employees would go against the decision of another Post Office employee. The view of the NFSP is that a proper mediation process via CEDR or ACAS should be used in such circumstances where Post Office bring their evidence and rationale and the Postmaster has the opportunity to offer their defence, without Post Office acting as judge, jury and executioner, in other words, Post Office having complete control over the situation.

328. **I am asked to set out any other comments, reflections or concerns**

(if any) I may have about POL's internal SPM support policies.

329. To Post Office's credit, they are now providing these documents on an annual basis for the NFSP to review. These are checked with our HR specialist legal team and responded to. Whilst Post Office have not always taken on board every point we have made, they are discussed. Added, the ownership of these documents is at a very high level within Post Office and sits under the Audit & Risk Committee. As to whether there is a Key Performance Indicator, this is not known by the NFSP.

GENERAL

330. **I am asked to set out my reflections on the extent to which the support and representation available to SPMs alleged to be responsible for shortfalls shown by the Horizon IT System was adequate or inadequate between 2000 and 2019 (inclusive).**

331. In terms of reflection, I can say that I and the NFSP's current leadership have no doubt that more could and should have been done to challenge the Post Office privately and in public and to prevent affected Postmaster from falling victim to this extended miscarriage of justice. This includes the repeated failure to take seriously or properly understand the importance of what was being said by some members and former members that Horizon was faulty and causing their shortfalls, George Thomson not taking the correspondence which he received from Sir Alan Bates seriously, and not only accepting the Post Office when they said that Horizon was 'robust' but George Thomson's promotion of that line, which impeded the ability of the organisation to assist its members who were seeking help. We are aware from the evidence that there are victims of the Horizon scandal

who were members of the NFSP who have cited disappointment and frustration with the actions of the NFSP and the representation they received. This is a source of deep regret and, on behalf of the NFSP I am genuinely sorry.

332. I would also reflect that while the Inquiry has heard evidence from many different sources that challenges to the 'Horizon is robust' line (whether from Second Sight, Sir Alan Bates over many years, Lord Arbuthnot, over 100 MPs and the JFSA) and it is clear Post Office could not be forced publicly to admit what they knew, this does not absolve the NFSP from failure to push Post Office much more seriously in the Horizon issues era.

333. **I am asked if there is anything further that is relevant to the Terms of Reference of which I think the Chair ought to be aware?**

334. *"It took a long time for things to go so far. It came about because things that should have been stopped were not stopped soon enough." – I Ching, or Book of Changes*

335. The big question that Postmasters would like answered is what next, when the Inquiry is complete? Whilst change is required, it should not be rushed. My own view is that sensible and pragmatic discussions need to take place, and it is important that egos are removed. Otherwise, Postmasters will suffer as a result. This is our one opportunity to showcase the Post Office as it can be for the benefit of communities across the country. As our Chair, Tim Boothman says "Postmasters have not enjoyed the Post Office their investment deserves."

336. We find that most Postmasters are disinterested in the noise or politics that exist around the Post Office and network. Postmasters are not looking to

be millionaires, they are looking to get up in the morning, open their Post Offices, serve their communities, pay their bills, provide for their families before closing their offices in the evening and living their lives.

337. Too many communities are losing their Post Office because it is no longer viable for the Postmaster to operate the service. Being apolitical, decisions by respective Governments over the last 30 years have resulted in the decline of “the most trusted brand in the UK.”

338. This whole sorry scandal comes down to three words: Power, Authority & Influence. Post Office had all of the power, authority and influence and used it to the detriment of the victims. Given the historical evidence that shows Post Office acting in such a detrimental manner towards Postmasters, they should not be in a position to determine nor dictate the future viability of a Postmasters investment.

339. In terms of the NFSP’s proposal for the way forward, and recognising that while mutualisation is the ultimate goal, as discussed earlier in this witness statement, the NFSP considers that in order for the relationship between Postmasters and Post Office to be repaired and for Postmasters to be treated fairly by Post Office, an Oversight Committee is what is required in order properly to hold Post Office to account. This document (NFSP Proposal for Oversight Committee January 2024, **WITN00370110**) is the NFSP’s draft proposal for such an Oversight Committee. This has been discussed by the Board of the NFSP at various points, the first of which being 18 months ago. It has since been discussed with members and presented on our national calls, local and regional meetings and conference, Post Office, DBT, MPs (including Kevin Hollinrake MP and Gareth Thomas MP, and Rt Hon Kemi

Badenoch MP – see Letter to Gareth Thomas MP (Minister of State for the Department of Business and Trade) from NFSP re governance suggestions 26 July 2024, **WITN00370114**, and Letter from NFSP to Rt Hon Kemi Badenoch MP (Secretary of State for Business and Trade) re Oversight Committee proposal 30 January 2024, **WITN00370121**).

340. As discussed previously, the NFSP has identified through the member surveys that Postmasters are concerned about their relationship with Post Office. The NFSP's view is that an Oversight Committee would be the option most likely to ensure that something like the Horizon scandal could not happen again, ensuring that Post Office still have a level of scrutiny after the current Inquiry is finished. The NFSP considers that the Inquiry has heard evidence that the Horizon scandal was effectively enabled by the "arms' length" relationship between Post Office and the Government, its sole shareholder. It is clear to us that this "arms' length" relationship and lack of Government oversight still exists today.

341. In the Oversight Committee proposal, the Committee would consist of a member of Government, members from membership bodies, such as the NFSP, the CWU and Unite, external legal representation, representative bodies for people who especially rely upon the Network, such as older people, people with disabilities, and people from rural areas, as well as a temporary role for individuals with relevant expertise on specific issues on the agenda. The Committee would have the ability to challenge the strategy of Post Office and provide scrutiny to decisions, improving transparency and corporate accountability. The NFSP hopes that this will assist with the early identification of issues and concerns within the network and rebuild both trust

in Post Office and the relationships between Post Office and other stakeholders, including the Postmasters. The NFSP's suggested scope for such a Committee is on page 6 of the draft proposal.

342. An example of why an Oversight Committee is required can be seen through the case study on page 9 of the draft proposal. We understand the Inquiry is aware of what we call "Bonusgate" (the award of bonuses to senior leaders for apparently complying with the Inquiry). This case study outlines how an Oversight Committee could have prevented this from happening, as well as how the Oversight Committee could work in practice in holding Post Office to account and the early identification and rectification of issues.

343. The NFSP is aware that franchising has been proposed as another way forward for Post Office. We believe this would cause a movement of risk from Post Office to Postmasters. Under the franchising proposal, Postmasters would have to pay Post Office to provide Post Office services within their branch. They would also have to lease the IT equipment from Post Office. If there was an issue with the IT equipment causing a loss to the Postmaster, the Postmaster rather than Post Office would automatically carry the loss unless and until they could prove that the fault was with Post Office's IT system. They would then have to pursue Post Office for the loss. The NFSP is therefore of the view that franchising would not prevent an issue such as the Horizon scandal from arising again, as it seems that this would just put further onus on Postmasters in relation to losses.

344. In addition, Post Office branches run by Postmasters are small businesses that are providing a service, and without their retail side most would be a complete loss. Whilst franchising seems like a good proposal on

the surface, we believe this would not work for the vast majority of Postmasters who are providing a service alongside their retail business, as the number of branches where you could actually earn a living from a Post Office alone is small. The NFSP has concerns that Post Office are looking for solutions which look good on the surface but would not be beneficial to Postmasters in practice.

345. The NFSP considers that an Oversight Committee would be more beneficial to members and protect their interests, in trying to ensure that their business partner, Post Office, no longer treats them as subservient.

346. All of that said, I do, however, believe that all is not lost. Postmasters have a contract with Government, via the Post Office, as it owns the Post Office. It is imperative that there is a change in focus from within Government and Post Office to see Postmasters as business partners due to their investment. We need to change the entirety of the relationship framework between Government and Post Office, which requires to be rewritten to provide greater significance to the investment of Postmasters. We need to work together to rebuild this business for the good of communities and the people within Post Office who serve them.

347. If the Post Office past was wrong and we want to make the Post Office tomorrow right, then we must grasp the opportunity of today to change the way Government and Post Office interact with Postmasters.

Statement of Truth

I believe the content of this statement to be true.

GRO

Signed: _____

Dated: 4th September 2024

Index to First Witness Statement of Calum Brian Greenhow

<u>No.</u>	<u>URN</u>	<u>Document Description</u>	<u>Control Number</u>
1	POL00113269	Common Issues Judgment	POL-0110651)
2	POL00027276	Post Office Group Executive Agenda 14/9/2017 and associated documents	POL-0023917
3	WITN00370130	NFSP Centenary book page 17	WITN00370130
4	NFSP00000899	Report Federation matters	VIS00013795
5	NFSP00001051	MEMORANDUM OF ASSOCIATION OF NATIONAL FEDERATION OF SUBPOSTMASTERS, Bates Wells & Braithwaite London LLP, revised 9th May 2021	VIS00013947
6	NFSP00001067	National Federation of Postmasters - Rules	VIS00013963
7	NFSP00001072	National Federation of Subpostmasters - Rules	VIS00013968
8	NFSP00001464	Letter (with enclosure) from David Taylor to G Thomson re: Trade Union and Labour Relations (Consolidation) Act 1992, Removal of Nation Federation of Sub-Postmasters from the list of trade unions	NFSP00001464
9	NFSP00000957	Special Conference	VIS00013853
10	NFSP00001075	Grant framework agreement Post Office Limited and National Federation of sub-postmasters	VIS00013971
11	NFSP00001086	NFSP Organisation structure	VIS00013982
12	NFSP00001094	NFSP organisation structure diagram	VIS00013990
13	NFSP00001034	NFSP Branch Secretaries Guide 2012	VIS00013930
14	NFSP00001033	Branch Secretaries Guide final	VIS00013929
15	WITN00370109	NFSP Public Affairs Manager Report to NFSP Board re issues affecting SPMs March 2024	WITN00370109
16	NFSP00001460	Email from Calum Greenhow to Helen Baker re: ace up the sleeve?	NFSP00001460
17	WITN00370126	Branch Secretaries' Circular dated 18 August 2015	WITN00370126
18	NFSP00000976	Branch Secretaries Circular from George Thomson re press release and information pack	NFSP00000976
19	POL00162628	Email chain from Angela Van-Den-Bogerd to Mark Davies RE:	POL-0151030

		Panorama - Trouble at the Post Office	
20	WITN00370129	Emails between Calum Greenhow and Tim McCormack re Dalmellington dated 9 August 2016	WITN00370129
21	UKGI00018137	Horizon Issues Judgment	UKGI028144-001
22	NFSP00000500	NFSP report of a meeting of the Council on 13-15 June 2016	VIS00008958
23	NFSP00001465	Email from George Thomson to Mervyn Jones re: Yesterday's Branch Meeting	NFSP00001465
24	NFSP00000888	National Executive Council Circulation with Memo from George Thomson to Executive officer re Lee Castleton - Horizon (Lee Castleton case study)	VIS00013784
25	POL00021699	Email from Martin Rolfe to Michael Rudkin others cc'd re: Bracknell Visit	POL-0018178
26	NFSP00001037	Motions for conference as agreed at the MRC meeting on February 2010	VIS00013933
27	NFSP00001044	Motions for conference as agreed at the MRC meeting on February 2010	VIS00013933
28	NFSP00000725	Horizon Next Generation Release Authorisation Board (Internal) Recommence Pilot Activities : Meeting no 10, Post Office (Internal RAB Meeting of 04 May 2010)	VIS00013621
29	NFSP00000806	Letter to Dave Hulbert from Marilyn Stoddart re Semilong Post Office Mrs Jane Brewer	VIS00013702
30	NFSP00000671	Email chain from Marilyn Stoddart to Andrew Craddock, Keith Richards re workshop agenda for Bracknell 22 Jan	VIS00013567
31	NFSP00001332	Email from Dave Hulbert to Marilyn Stoddart Re: Issues around the recovery process following Horizon outage	NFSP00001332
32	POL00142870	Agenda and Briefing for Paula Vennell's meeting with George Thomson on 13 March 2013	POL-BSFF-0002035
33	NFSP00000761	Post Office Ltd Section 1 Operators Contract and Status	VIS00013657
34	POL00075132	Subpostmasters' contract	POL-0071695
35	POL00003870	BM20 - Preface and Standard Conditions for the Operation of a Main Post Office	VIS00004884
36	POL00372920	POL Standard Conditions on Site Commercial Transfer - Local Post	POL-BSFF-0200313

		Office Branch (POL Cash) Agreement Existing Premises, New Operator	
37	NFSP00001041	Open Debate resume losses audit suspension	VIS00013937
38	UKGI00025299	Email from Tom Aldred to Beth White, William Wilson, Post Office Team and others re BEIS/NFSP/UKGI meeting 26/11/19 - read out	UKGI034194-001
39	NFSP00000511	National Federation of Subpostmasters Report of a Meeting of the National Executive Council on 15-17 June 2009	VIS00008969
40	NFSP00001352	Spreadsheet concerning terminals and Post office Horizon software transactions (mails closed actions; branch support and compatibility report) - last updated was 12 February 2019	NFSP00001352
41	NFSP00000848	NFSP Branch Secretaries' Training Representing Members RTUs ad Appeals	VIS00013744
42	NFSP00000822	Publicity and Development Committee: Branch Secretaries Training reasons to urge and appeals interviews recruitment	VIS00013718
43	NFSP00001291	Email from David Milner to Anita Turner, Marilyn Stoddard, George Thomson and others - Re: National Savings Payment Advice	NFSP00001291
44	NFSP00001305	Email from Andrew Winn to Marilyn Stoddard and Branch Support Team re: Balance discrepancy, Queen's Ferry Post Office.	NFSP00001305
45	POL00041564	Bankruptcy, prosecution and disrupted livelihoods - Postmasters tell their story; reported by Rebecca Thomson - Article	POL-0038046
46	WITN00370102	Emails between Calum Greenhow (as Branch Secretary), Donald Ramsay (Scottish Executive Officer) and Paul McBain (Scottish Non-Executive Director) after Panorama Programme 18 August 2015	WITN00370102
47	WITN00370103	Donald Ramsay (Scottish Executive Officer) and Paul McBain (Scottish Non-Executive Director) after Panorama Programme 19 August 2015	WITN00370103

48	WITN00370131	NFSP Scottish Regional Council Minutes dated 2 October 2015	WITN00370131
49	NFSP00000292	NFSP - Branch Secretaries Circular vol. 31	VIS00008740
50	NFSP00001058	Letter chain from Colin Baker to Alan Bates RE: Horizon System	VIS00013954
51	NFSP00001014	Branch Secretaries' Circular - February 2010 - Volume 9	VIS00013910
52	NFSP00000061	Letter on Horizon Online Pilot Review from Marilyn Stoddart with email attachment of feedback from Mark Burley	VIS00007509
53	NFSP00000040	Summary of meeting with Tim Parker and Paula Vennells on 29 May 2018	VIS00007488
54	WITN003700132	Email to Paula Vennells over Post Office's Annual Report & Accounts 14 September 2018	WITN003700132
55	NFSP00001110	CWU Research: Post Bank Campaign Briefing	NFSP00001110
56	NFSP00001116	NFSP Briefing – Postbank: All Party Parliamentary Group for Post Offices	NFSP00001116
57	NFSP00001105	All Party Parliamentary Group for Post Offices- Agenda for AGM/Meeting on Postbank	NFSP00001105
58	NFSP00000263	Letter (Branch Secretaries Circular) from George Thomson to unnamed colleague re Horizon Mediation Scheme	VIS00008711
59	NFSP00000699	Email from George Thomson to Paul Hook CC'd George Thomson, Annabel Barnett RE;POL Horizon mediation scheme	VIS00013595
60	NFSP00000695	Meeting 29/8/13 148 Old St. Gayle Peacock, Stefani Ulgiati, Ann Analka? ,Andrew Gilhooly, Marilyn Stoddart, Ian Park	VIS00013591
61	NFSP00000707	Email from Calum Greenhow To: Keith Richards, Sharon Merryweather, Lynda Willoughby re FW: RE: Branch Refresh	VIS00013603
62	NFSP00000710	Email form Jon Follenfant to The Subpostmaster, Jim Nott, Kevin Whitlock and others RE: Articles for the Magazine?	VIS00013606
63	NFSP00000870	Letter from Calum Greenhow to Colleague re Group Litigation Bates v Post Office	VIS00013766
64	NFSP00000779	Email chain from Lynne Eccles RE: NFSP piece	VIS00013675

65	NFSP00000777	Email chain from Peter Hall to Nick Wallis RE:Book	VIS00013673
66	NFSP00000774	Email from Calum Greenhow to Calum Greenhow re: FW: Press and other enquiries RE Post Office trial	VIS00013670
67	WITN00370101	NFSP Report to Calum Greenhow on Girocheques Issue by Andrew Gilhooly (former National President and NED for Scotland of the NFSP) (undated)	WITN00370101
68	POL00296010	Email from George Thomson to Nick Beal, cc'd Kevin Gililand and Paula Vennells re PRINTED Fwd: Horizon Investigation	POL-BSFF-0134060
69	NFSP00000558	NFSP report of a meeting of the council on 25 - 26 March 2019	VIS00009016
70	NFSP00000712	Email from Sharon Merryweather to David Sanghera and others. CC ing Calum Greenhow and others. RE: Court Case	VIS00013608
71	NFSP00000774	Email from Calum Greenhow to Calum Greenhow re: FW: Press and other enquiries RE Post Office trial	VIS00013670
72	NFSP00001387	Email chain from Calum Greenhow to Calum Greenhow RE: FW: Revised column - Column for April magazine NFSP	NFSP00001387
73	NFSP00001234	Email from Sharon Merryweather to Douglas Kemp and Calum Greenhow - Re: FW: Message Via Contact Form on Website	NFSP00001234
74	NFSP00000715	Email from Peter Hall to Calum Greenhow. RE: Elephant in the room section of the magazine article on your conference speech	VIS00013611
75	POL00393126	Email from Calum Greenhow to Mark R Davies RE: Support to Sustain our Post Office	POL-BSFF-0220013
76	UKGI00017689	Email from Joshua Scott (UKGI) to Tom Cooper, Tom Aldred, Oluwatosin Adegun and others Re: POL Biweekly Comms Catch up	UKGI027696-001
77	POL00291032	Email from Melanie Corfield to Patrick Bourke re: RE: Horizon verdict v3	POL-BSFF-0129095
78	POL00291026	Horizon Verdict V3	POL-BSFF-0129089
79	NFSP00000292	NFSP - Branch Secretaries Circular vol. 31	VIS00008740

80	NFSP00001321	Email from Amanda Cox to Mr Andrew B Summers cc, Calum Greenhow RE: Horizon trial judgement FAD: 200647 Post Office: Orleton PO	NFSP00001321
81	NFSP00000718	Email from Nick Beal to Calum Greenhow, Peter Hall re: Media statement - concerning Post Office Response to Group Litigation Judgment	VIS00013614
82	NFSP00001079	Grant framework agreement meeting	VIS00013975
83	NFSP00000766	Email from Calum Greenhow to Calum Greenhow re: FW: Advice in relation to potential Post Office actions	VIS00013662
84	NFSP00001390	Email from Ian Park to Jenna Khalfan cc George Thomson, Philip Bloor RE: threats	NFSP00001390
85	NFSP00000727	Email from Calum Greenhow to Calum Greenhow re: FW: NFSP follow up	VIS00013623
86	NFSP00000534	NFSP report of a meeting of the Council held on 19 & 20 June 2017	VIS00008992
87	NFSP00000710	Email form Jon Follenfant to The Subpostmaster, Jim Nott, Kevin Whitlock and others RE: Articles for the Magazine?	VIS00013606
88	NFSP00000758	Grant Framework Agreement: Post Office and National Federation of SPM	VIS00013654
89	NFSP00000728	Email from Calum Greenhow to Calum Greenhow re: FW: Grant Agreement - to be published on the 'about us' page on the website	VIS00013624
90	NFSP00000905	Branch Secretaries Circular - Guidance for NFSP members re historic losses	VIS00013801
91	NFSP00000492	NFSP report of a virtual meeting of the Council on 16 June 2020 and slides from presentation on HSS NFSP Support	VIS00008950
92	UKGI00030616	Email from Brooks White to Wilson William, Cecilia Vandini, Joshua Scott and others RE: Tomorrow's Catch Up	UKGI039511-001
93	NFSP00000778	Letter from Nick Read RE: Options to explore on further compensation of GLO Claimants	VIS00013674
94	WITN00370105	Letter to Nick Read (Group CEO, POL) from the NFSP re further	WITN00370105

		compensation of GLO claimants 9 July 2020	
95	WITN00370106	Letter to Kevin Hollinrake MP (Postal Affairs Minister) after ITV drama 8 January 2024	WITN00370106
96	WITN00370125	see Letter to House of Commons from the NFSP re Current Network Issues 12 December 2022	WITN00370125
97	WITN00370113	NFSP Member Survey Results 2021	WITN00370113
98	WITN00370119	Letter to Gareth Thomas MP (Minister of State for the Department of Business and Trade) with NFSP introductions and outline of key SPM issues 11 July 2024	WITN00370119
99	WITN00370122	NFSP's Proposed Draft Letter from Members to their MP re remuneration and Horizon Inquiry July 2024	WITN00370122
100	WITN00370112	NFSP's Proposed Draft Letter from Members to their MP re DVLA and other issues July 2023	WITN00370112
101	POL00392930	NFSP's Written Submission to Business, Energy and Industrial Strategy Committee re Post Office Network Inquiry 2020	POL-BSFF-0219817
102	WITN00370107	Working Group Minutes between the Department of Business and Trade, POL and NFSP 29 March 2023	WITN00370107
103	WITN00370108	Working Group Minutes between the Department of Business and Trade, POL and NFSP 12 July 2023	WITN00370108
104	WITN00370128	Emails between Calum Greenhow and Postmaster NEDs Re_ Hard to Place dated 8 December 2023	WITN00370128
105	WITN00370124	NFSP Public Affairs Manager Spreadsheet with Monthly Overview of SPM issues to June 2024	WITN00370124
106	WITN00370123	Subpostmaster Magazine Graphic re results of member survey April 24	WITN00370123
107	NFSP00000464	NFSP Report of Meeting of the Council on 17 and 18 June 2019	VIS00008922
108	WITN00370116	NFSP Conference Programme 11 – 13 May 2024	WITN00370116
109	WITN00370111	NFSP Newsletter to Members 15 August 2024	WITN00370111
110	WITN00370117	NFSP and POL Wellbeing Overview Spreadsheet 24 July 2024	WITN00370117
111	WITN00370127	Email from Lisa Harmsworth to Calum Greenhow re denied	WITN00370127

		membership request dated 13 March 2024	
112	WITN00370118	Letter to Simon Thompson (CEO of Royal Mail) and Keith Williams (Chair of Royal Mail) from NFSP re remuneration 22 July 2024	WITN00370118
113	RLIT0000201	News article from The Times titled 'Postmasters on Post Office board 'ignored and unwanted	RLIT0000201
114	NFSP00000713	Email from Sharon Merryweather to Audrey Cameron CC ing Calum Greenhow. RE: FW: Grant Fund Agreement	VIS00013609
115	NFSP00000497	Report of a Meeting of the Council held on 14 and 15 October 2019	VIS00008955
116	NFSP00000716	Email from Calum.Greenhow to Sharon Merryweather. RE: Grant Framework Agreement	VIS00013612
117	NFSP00001082	Draft deed of variation of grant framework agreement	VIS00013978
118	WITN00370120	Letter of Engagement between NFSP and Grant Thornton 4 July 2024	WITN00370120
119	POL00088885	Email chain from Jo Milton to Keith Richards re: Policies (postmaster support policies & Postmaster Guide to Policies)	POL-0085943
120	POL00088886	Post Office Audit Opening Script	POL-0085944
121	POL00088887	A short guide to the Audit Reporting Tool (ART)	POL-0085945
122	POL00088888	Audit Closing Script	POL-0085946
123	POL00088889	Postmaster Contract Suspension Policy v3.0	POL-0085947
124	POL00088890	Postmaster Contract Termination Policy V3.0	POL-0085948
125	POL00088892	Postmaster Termination Decision Review Policy V2.3	POL-0085950
126	POL00088893	Postmaster Support Policies: Network Monitoring and Audit Support Policy (v.V1.5)	POL-0085951
127	POL00088894	Postmaster Support Policies: Postmaster Account Support Policy - Version V1.5	POL-0085952
128	POL00088895	Postmaster Support Policies: Postmaster Contract Performance Policy (v.V3.0)	POL-0085953
129	POL00088891	Postmaster Guide to Policies Version – V1.2 (undated)	POL-0085949

130	POL00088896	Responses to NFSP questions on Postmaster Support policies	POL-0085954
131	WITN00370110	NFSP Proposal for Oversight Committee January 2024	WITN00370110
132	WITN00370114	Letter to Gareth Thomas MP (Minister of State for the Department of Business and Trade) from NFSP re governance suggestions 26 July 2024	WITN00370114
133	WITN00370121	Letter from NFSP to Rt Hon Kemi Badenoch MP (Secretary of State for Business and Trade) re Oversight Committee proposal 30 January 2024	WITN00370121