

Thursday, 10 October 2024

1
2 (9.59 am)
3 **NICHOLAS JAMES READ (continued)**
4 **Questioned by MR BEER (continued)**
5 **SIR WYN WILLIAMS:** Mr Beer.
6 **MR BEER:** Yes. Thank you, sir.
7 Good morning, Mr Read.
8 **A.** Good morning.
9 **Q.** Can I ask, to begin, one set of questions arising from
10 something that you said in the course of your evidence
11 yesterday.
12 I think you'll recall that the Inquiry, the Chairman
13 held compensation hearings, ie hearings into the
14 schemes --
15 **A.** Yes.
16 **Q.** -- that were set up to provide redress to postmasters,
17 and he held four such hearings: one on 6 July, one on
18 13 July 2022, one on 8 December 2022, and then one on
19 27 April 2023, which I suspect you'll remember
20 particularly because you attended it, you sat alongside,
21 I think, Ms Gallafent KC --
22 **A.** Yes.
23 **Q.** -- with Mr Staunton, the then Chairman of the Post
24 Office sitting behind you.
25 So in none of those four hearings was it said by the

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1 been caused", ie it should have involvement in and be
2 involved in the administration of the schemes.
3 You went on to say that, by contrast, it was your
4 firmly held view that, for a range of reasons, the Post
5 Office should have nothing to do with the provision of
6 redress to wronged subpostmasters, certainly in terms of
7 financial compensation.
8 Was that a personal view that you held?
9 **A.** It is a personal view that I hold but I think it's also
10 a view that is held by others within the Post Office.
11 Certainly, just to confirm your earlier comments, we
12 have done everything that we can to build independence
13 into the schemes, but I think the start point of this,
14 and it's -- it will be Simon Recaldin's view, I'm sure,
15 when you speak to him next week, as well, that there was
16 always going to be difficulty with the Post Office
17 administering compensation because of the level of trust
18 and confidence that many of the victims will have in the
19 Post Office. So I don't think it's a particularly
20 controversial position.
21 **Q.** Was it the corporate view, essentially, of the Post
22 Office?
23 **A.** Yes, it was and has been for some time.
24 **Q.** If that was the corporate view of the Post Office, why
25 was it not communicated to the Inquiry in any of those

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1 Post Office that it was the Post Office's belief that
2 it, the Post Office, should not be administering the
3 schemes of redress or any of them; do you agree?
4 **A.** I can't recall the specifics of that. It may be the
5 case.
6 **Q.** Nor was it said that the Inquiry should make
7 recommendations accordingly, whether in its progress
8 updates in its interim reports, saying that the Post
9 Office should not be administering any of these schemes.
10 Instead, the Post Office's position, and I summarise
11 greatly, was that it was properly administering the
12 schemes for which it had responsibility and that
13 sufficient elements of independence were either already
14 built into the schemes or could be built into them; do
15 you agree?
16 **A.** That's what I said yesterday, yes, indeed.
17 **Q.** You said yesterday that you looked at some
18 contemporaneous notes of a conversation that you had
19 with the Government, Post Office's shareholder, and you
20 say:
21 "The way it was portrayed to me was that the
22 Treasury were of the opinion that the chaos -- I think
23 was the word that was used -- that had been caused
24 by the Post Office, there was a desire for the Post
25 Office to experience some of the discomfort that had

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1 four hearings, ie "We do not want anything to do with
2 redress schemes. We think it is difficult for us to be
3 involved," for the reasons that you give, "Please make
4 recommendations to take this business away from us"?
5 **A.** It's a good question. I'm not sure specifically why we
6 didn't say that. It is a conversation that has been
7 ongoing with Government for some time. That's our
8 failure to do so.
9 **Q.** The Inquiry was considering those very things, there
10 were subpostmaster groups who were saying, "Take the
11 function away from, or do not give the function to, the
12 Post Office", and the Chairman was considering making
13 recommendations about those very things. Again, I ask,
14 if that was the corporate view of the Post Office, why
15 did it not communicate it?
16 **A.** It's a good question. I'm unsure why we didn't make
17 that very explicit. Clearly, we should have done.
18 **Q.** Or is it a view that you've now come to in the light of
19 the events which have happened?
20 **A.** No, it's a view that I've held for some time and it's
21 a view within the organisation that has been held for
22 some time.
23 **SIR WYN WILLIAMS:** I think I'd like a straight answer to the
24 question: was it a view held by the organisation at the
25 dates of each of those compensation hearings?

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- 1 A. It's been a view held by the organisation since the very
2 start of the schemes.
- 3 **SIR WYN WILLIAMS:** Right so it was, then?
- 4 A. Yes.
- 5 **MR BEER:** Can I continue, then, Mr Read, with the topic we
6 were addressing yesterday afternoon: the investigation
7 of postmasters and the engagement of the Post Office
8 with law enforcement agencies.
- 9 A. Yes.
- 10 Q. Can we look, please, at POL00448310. These are the
11 minutes of the SEG, the Strategic Executive Group, which
12 you mentioned and explained to us yesterday, held
13 relatively recently, 26 June 2024. You're shown,
14 amongst others, as present, along with Mr Brocklesby,
15 Mr Woodley, Nicola Marriott, Karen McEwan and Sarah
16 Gray. Do you recall that in this meeting, the SEG had
17 to consider, because it was tabled before it, a paper
18 concerning the passage of material to law enforcement
19 agencies?
- 20 A. I don't specifically -- do you have it in --
- 21 Q. Yes, let's look at the paper that was tabled before this
22 SEG and it might help you.
- 23 A. Yes.
- 24 Q. POL00448345. You can see that it's a SEG report, the
25 meeting date is 26 June 2024. The author was

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1 Enforcement Policy ('new Policy'). The draft new
2 Policy, amongst other investigative operational policy
3 changes, proposes a streamlining of the governance of
4 providing law enforcement with information: the Director
5 of A&CI and the in-house criminal counsel would have to
6 agree to providing the information and, depending on the
7 age of the information, a caveat would also be
8 provided."

9 Then "Report", paragraph 2:

10 "How the Investigations Policy was implemented in
11 respect of possible criminal matters relied upon its
12 interaction with the CLEP and Legal Play Book. These
13 were focused on limiting in a high-risk perception
14 environment how [Post Office] reported matters to, and
15 shared data with, law enforcement. Uniquely, sharing
16 data in a witness statement or as an exhibit required
17 the extraordinary permission of the Board."

18 So that's talking about the past, isn't it?

- 19 A. Yes.
- 20 Q. Is that right, that in order for Horizon data in
21 a witness statement or Horizon data in an exhibit to be
22 passed to a law enforcement agency, that required the
23 permission of the full Post Office Board?
- 24 A. That's correct.
- 25 Q. That was the position, okay:

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- 1 Mr Bartlett, director of A&CI, the sponsor was Ms Gray,
2 Interim Group General Counsel. If we look at the
3 Executive -- sorry, we should look at the "Input
4 Sought":
- 5 "SEG approval is sought regarding the proposed
6 change in process in governing the passing of
7 information to law enforcement to assist them in
8 criminal investigations and any subsequent prosecutions
9 prior to this matter being discussed at Board in July
10 2024."

11 So it's seeking, is this right, the SEG, that
12 group's approval, to pass a policy for approval to the
13 full Post Office Board.

- 14 A. That's what it's suggesting, yes.
- 15 Q. Yes. "Executive Summary":
- 16 "The current Group Investigations Policy,
17 Cooperation with Law Enforcement Policy ('the CLEP'),
18 and Legal Play Book (collectively 'the old Policies')
19 are considered too unwieldy and unnecessarily complex as
20 well as being drafted before the existence of [A&CI].
21 The CLEP has resulted in slower than needed provision of
22 information to law enforcement and the unnecessary
23 involvement of the Board in the authorisation process.
- 24 "The old Policies have been consolidated into a new
25 draft single Investigation and Cooperation with Law

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1 "3. The old Policies are not enabling [Post Office]
2 to act in an agile way in monitoring forward with
3 reporting instances to law enforcement where [the Post
4 Office] suspects that they may have been a victim of
5 crime or promptly servicing lawful requests for
6 information to aid a police investigation. A&CI
7 recently took responsibility for being the only conduit
8 for witness statements to be provided to the police,
9 including relieving the Security team of this activity."

10 Then over the page.

11 "This has given us the first [pan-Post Office]
12 picture of the scale of these requests and what is
13 required to service them objectively and in
14 an evidence-based way. There are currently 22 police
15 forces requesting or awaiting Horizon-based evidence
16 across 33 police investigations. To provide this
17 information, A&CI will need to draw upon Horizon data
18 and often provide transaction analysis. The current
19 approach is that the Board will need to be approached in
20 the majority of these cases as and when the data is able
21 to be shared.

22 "A draft policy is attached with the proposed
23 replacement for the old Policies to reflect the enhanced
24 capabilities of the A&CI and the improved governance
25 approach to investigations generally. In particular,

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1 the draft proposes a change in the governance of passing
2 material to law enforcement which we believe is risk
3 balanced."

4 Then an extract from the draft is set out,
5 paragraph 1, within paragraph 9:

6 "Proactively and reactively supplied information
7 will have differing profiles due to historic technology
8 issues. The version of Horizon that was considered at
9 fault in the Horizon IT scandal was replaced in October
10 2019. In 2020, known errors and bugs identified in the
11 Horizon Issues Judgment formed part of review by KPMG of
12 the system and found not to be prevalent in the system.
13 From 2021, a new collaborative approach was taken to
14 resolving reported Horizon issues in a dispute
15 resolution process. Due to the effect of these
16 developments, the following approach to data sharing
17 with [law enforcement agencies] is:

18 Then skipping:

19 "Any information originating from Horizon after
20 1 January may be passed as either intelligence or
21 evidence only after DA&CI ..."

22 I think that's the Director of A&CI; is that right?

23 A. That's correct.

24 Q. "... (or their nominated deputy) and an in-house
25 [counsel] both give approval. A record of [the

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1 developed to work collegiately with Postmasters to
2 understand the causes [of] any shortfalls. Any Horizon
3 data that pre-dates January 2022 cannot be shown to have
4 benefited from all three of these checks and balances."

5 Then the SEG paper continues:

6 "There are significant differences between the
7 environment that existed at the time the old Policies
8 were formed and the current and future environment. The
9 current approach to dispute resolution and the
10 underlying technology could be seen as supporting a more
11 [business as usual] approach to passing information to
12 law enforcement. However, the most significant
13 difference between 2019 when the old Policies were
14 drafted and now is that A&CI exists and brings
15 significant criminal investigation experience to bear,
16 but more importantly, also considerably more objective
17 rigour to assessing evidence. Project Panther within
18 A&CI is solely focused on testing the reliability of
19 data that [Post Office] investigators and law
20 enforcement will rely upon."

21 Then paragraph 9:

22 "SEG is asked to discuss the proposed change of
23 approach in advance of a proposal being presented at the
24 Board in July."

25 Just stepping back, so the context is made clear by

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1 decision] must be recorded ...

2 "Where information is requested by LEAs that is
3 Horizon data originating from pre-1 January 2022, the
4 same process must be followed. In addition, the wording
5 included in the relevant section of the *Investigator's*
6 *Manual* covering the passing of information to LEAs must
7 be included in any witness statement for evidence or in
8 an accompanying email or letter to the LEA requesting
9 the information in a non-evidential format."

10 Q. If we carry on, if we scroll down, please, and then back
11 to the paper itself, paragraph 6:

12 "The accompanying lines referenced above which
13 caveat the material passed to law enforcement is also in
14 draft and is ..."

15 So this seems to be some wording that that it was
16 proposed would caveat certain disclosures:

17 "From 31 December 2019, all post offices have worked
18 on a version of Horizon that the High Court case of
19 Bates & Others has been considered by the High Court to
20 be 'relatively robust'."

21 I think there are some extra words or words missing
22 from that sentence, but anyway:

23 "In 2020, Horizon was tested for the known errors
24 and bugs identified in the Horizon Issues Judgment and
25 found not to be prevalent. During 2021, a process was

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1 this paper, isn't it, that there were a large number of
2 forces, some 22 --

3 A. Yes.

4 Q. -- requesting evidence or requesting data in quite
5 a large number of cases, 33 cases?

6 A. Mm-hm.

7 Q. To summarise what we've just read there, would you
8 agree, the proposed new approach had two elements to it:
9 firstly, there would be no more need for Board approval
10 for sharing a witness statement about Horizon or sharing
11 Horizon data, instead, approval would come from the
12 Director of A&CI plus an in-house counsel; secondly,
13 when a witness statement or data was shared, if it
14 related to pre-January '22 data, it would be caveated in
15 the way that we saw.

16 A. Yes.

17 Q. That form of words would be applied to it?

18 A. (*The witness nodded*)

19 Q. Can we go back to the SEG minutes, please. POL00448310.
20 So this is the meeting at which this paper was
21 presented. If we go forwards to page 7, please, and
22 scroll down to paragraph 4.6 under the heading
23 "Disclosure to support police investigations", presented
24 by Ms Gray and Mr Bartlett:

25 "TABLED and NOTED was the paper on Disclosure to

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1 support police investigations/Passing of material to law
2 enforcement.
3 "SEG DECLINED to APPROVE the submission of the paper
4 on disclosure support for police investigations to the
5 Board, noting further work and assurance was required in
6 relation to Horizon data assurance."

7 So questions arising from these two documents:
8 looking at the position as it stood before the SEG
9 paper, why was the Board's permission required to share
10 Horizon data with law enforcement agencies in a witness
11 statement or as an exhibit?

12 **A.** I think we touched on this yesterday, and the view of
13 the Board was that they wanted to have visibility for
14 any kind of data that was being provided to law
15 enforcement agencies, and that they wanted sight of the
16 sort of scale of the requests and, indeed, how that was
17 being operated. And I think we described yesterday that
18 there was that effective trade-off between requests from
19 LEAs and the requirement to conform to those requests,
20 whilst at the same time visibility, quite rightly from
21 the Board, that they wanted to understand where we were
22 engaging with law enforcement agencies, what type of
23 issue was being displayed, and to continue with that.

24 And I think that is why the SEG declined to approve
25 the submission of the paper. I think there was some

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1 So yes, I think there were certainly questions over
2 data assurance but I think it was a broader assurance
3 that the SEG were also looking for.

4 **Q.** You said, and one can understand why, the Board might
5 want to understand the scale of Horizon disclosure for
6 law enforcement purposes, and to have visibility?

7 **A.** Mm.

8 **Q.** That is satisfied by the provision of information to the
9 Board.

10 **A.** *(The witness nodded)*

11 **Q.** What this describes is that the Board had to give its
12 permission in order for a disclosure to occur. How did
13 the Board, in fact, go about determining whether to give
14 permission for disclosure or not?

15 **A.** Don't recall having specific cases come to the Board for
16 that particular -- to respond to that particular issue.
17 I think this is still fairly uncharted territory for the
18 organisation in its sort of modern guise, in terms of
19 how we supply information to LEAs. So I don't think
20 we'd had a breakdown, certainly at the Board not in my
21 time, of a specific case and then got under the skin of
22 how and what we are supplying and in what context.

23 So I think this is the start of that -- of that
24 journey, for want of a better word, in the sense that
25 this is the A&CI coming forward with a proposal.

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1 surprise -- my recollection from the meeting, there was
2 some surprise at the scale of requests in terms of the
3 22 law enforcement agencies and the 33 requests.
4 I think that came as a surprise to colleagues. I think
5 we were of the opinion that it was in the ones and twos,
6 in terms of requests for information on the sort of
7 scale, and I think that was -- the primary discomfort
8 was the size and the number of requests that were coming
9 forward. And, therefore, a better understanding of --
10 and a bigger understanding of the picture, was
11 requested.

12 **Q.** Well, in fact -- and we'll come to this in a moment --
13 what the minutes note is that "further work and
14 assurance was required in relation to Horizon data
15 assurance", not to know more about the number or nature
16 of requests. It's about assuring, presumably, the
17 quality, accuracy and integrity of Horizon data that
18 this I referring to?

19 **A.** That too, certainly, but I think it was more a case of
20 understanding the bigger picture. I think there wasn't
21 that level of understanding at the SEG and I think we
22 needed to understand more broadly, you know, what was
23 being requested, in what form, and how we were going to
24 supply that information, and what reassurance that we
25 had that we were doing this in an appropriate way.

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1 **SIR WYN WILLIAMS:** I'm sorry, Mr Read, I don't want to make
2 it sound as if Mr Beer and I are Starsky and Hutch, but
3 I just don't follow that because all those requests for
4 information from the police, the 33 of them, the vast
5 majority of them presumably couldn't have occurred
6 without the Board already having sanctioned a report to
7 the police.

8 **A.** Well, yes, the way that I understand it is that the
9 police have obviously requested information, there will
10 be a reason why the --

11 **SIR WYN WILLIAMS:** Yes, but what I mean is that, once the
12 Board are asked to sanction a report to the police, they
13 obviously know that there is a case which is now being
14 investigated by the police?

15 **A.** Yes.

16 **MR BEER:** The way that the paper put it was that:

17 "There are currently 22 police forces requesting or
18 awaiting Horizon-based evidence across 33 police
19 investigations, the current approach is that the Board
20 will need to be approached in the majority of these
21 matters as and when the data is able to be shared."

22 **A.** Yes.

23 **Q.** Was the organisation simply not processing these
24 requests --

25 **A.** Yes, I think that's --

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1 Q. -- essentially you're paralysed?
 2 A. I think that's the point that's being made.
 3 Q. Do you know whether the Post Office had disclosed what
 4 Mr Cameron had summarised at that meeting that we looked
 5 at yesterday -- do you remember the January 2023
 6 meeting, the quarterly meeting with UKGI --
 7 A. Mm.
 8 Q. -- and DBT, where he said that the Horizon data is not
 9 sufficient to do an investigation in many cases; do you
 10 know whether that kind of disclosure had been made to
 11 the police service?
 12 A. I'm not sure.
 13 Q. Do you know whether A&CI had in fact provided, before
 14 June 2024, Horizon data and transaction analysis to the
 15 police?
 16 A. I don't recall a specific case of that coming to the SEG
 17 or to the Board, no.
 18 Q. How was, in the 33 cases, the Post Office ensuring that
 19 the Horizon data that it proposed to provide to the
 20 police service was sufficient and that the transaction
 21 analysis that went with it was sound?
 22 A. I don't have -- as I say, this is work that's in train.
 23 I don't have the specific detail of that.
 24 Q. The proposal that Mr Bartlett and Ms Gray made, by way
 25 of their SEG report, was to essentially devolve

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1 enforcement agencies would rely on in a prosecution?
 2 A. No, I haven't seen how the testing process works.
 3 Q. Do you know what data, which data A&CI was testing?
 4 A. No, I don't have access to that.
 5 Q. Did you agree with the SEG's decision to decline to
 6 approve the submission of the Bartlett paper to the
 7 Board?
 8 A. I believe so, yes. It's -- I think we've found the
 9 step, the step and the move, pretty significant, as
 10 group, and we discussed it obviously as group.
 11 Q. Why did you find the step significant?
 12 A. I think, as I mentioned a little earlier, I was
 13 surprised at the number of law enforcement agencies that
 14 were engaging with us, and the scale of the interest,
 15 the 22 and the 33.
 16 Q. So it was the number of cases in which disclosure would
 17 or could occur that caused pause for thought?
 18 A. It caused pause for thought, primarily because the team
 19 in A&CI is stretched, massively stretched, as we
 20 mentioned yesterday, both in terms of its response to
 21 the variety of work, both internal investigations of
 22 senior colleagues, the assurance work they're providing
 23 on loss recovery and discrepancies, as well as the
 24 engagement with law enforcement agencies and, in
 25 addition to that, the work they're doing on Speak Up.

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1 responsibility for permission to in-house counsel and to
 2 Mr Bartlett, and one of the reasons given was that the
 3 A&CI bring "considerably more objective rigour to
 4 assessing evidence". How do A&CI bring considerably
 5 more objective rigour to assessing evidence?
 6 A. I think the majority of the individuals who work within
 7 the A&CI, which I think, as we discussed yesterday, is
 8 a relatively new organisation. Within that team, there
 9 are primarily individuals who have worked in law
 10 enforcement outside of the Post Office and I think the
 11 assumption is therefore being made that these are
 12 individuals who have the right training and the right
 13 experience of law enforcement, more specifically than
 14 perhaps was the case in the past.
 15 And I think what is being demonstrated here is
 16 a transition from the old Security Teams that operated
 17 within the Post Office historically, which were made up
 18 of a variety of different individuals, and the more
 19 professional approach that's now being adopted by A&CI,
 20 with better training, better skills and better
 21 experience associated with law enforcement.
 22 Q. More specifically, you mention better training,
 23 procedures and personnel. More specifically, do you
 24 know how A&CI was testing the reliability of Horizon
 25 data that the Post Office and then subsequently law

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1 So I think the team was very stretched. This felt
 2 like considerably large amounts of work and I think we
 3 wanted to make sure that it was being thoroughly
 4 administered.
 5 Q. Did anyone within the SEG disagree with the SEG
 6 decision, ie they wanted to approve the submission of
 7 the paper to the Board?
 8 A. I don't recall the specifics but I don't think so.
 9 Q. I mean, presumably, Mr Bartlett --
 10 A. Yes, clearly.
 11 Q. -- and Ms Gray --
 12 A. Will have --
 13 Q. -- will have sponsored and written it and proposed it?
 14 A. Correct, but they're not obviously members of the SEG.
 15 Q. The minutes of the SEG recorded that "Further work and
 16 assurance was required in relation to Horizon data
 17 assurance"; can you help, firstly, with what that means?
 18 A. I think the methodology -- and I'm slightly speculating
 19 but I think it's the methodology associated with how we
 20 are testing Horizon data and how we are assuring
 21 ourselves, both from an IT -- with the IT function but
 22 also with colleagues at Fujitsu that we have
 23 a methodology that is robust.
 24 Q. One reading of the note of the minutes is that "We've
 25 got to satisfy ourselves in-house as to the quality and

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1 reliability of our Horizon data before we think about
 2 passing it to law enforcement agencies and before we
 3 downgrade from the Board to two other individuals the
 4 permission to do so".

5 **A.** Yes.

6 **Q.** Would that be a fair summary?

7 **A.** Yes, that would be a fair summary.

8 **Q.** Okay. Has the further work and assurance in relation to
 9 Horizon data assurance been undertaken, to your
 10 knowledge?

11 **A.** Not to my knowledge. I'm unaware as to what progress
 12 has been made over July, August and September.

13 **Q.** Do you know who it was proposed should undertake that
 14 Horizon data assurance?

15 **A.** No, I haven't got that detail.

16 **Q.** I mean, we've seen, for example in Mr Patterson's
 17 letters some things said by Fujitsu that would be
 18 disclosable, or at least potentially disclosable, in
 19 criminal proceedings. Certainly, as a defence lawyer,
 20 I would want to see them.

21 **A.** Right.

22 **Q.** Was that brought into account in any of this process,
 23 ie what was going on at the higher level between Post
 24 Office and Fujitsu and, in the course of such
 25 correspondence, what Fujitsu felt unable to say in its

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1 scroll on, please, "Criminal Conduct: Reporting";
 2 "Inducement to Act Contrary to the Rules"; then over the
 3 page, "Theft by Strangers"; "Failures to Report
 4 Dishonesty"; then the cross-heading, "Enquiries by
 5 Officers of the Post Office Investigation Division",
 6 POID, as it used to be known for many, many years. It
 7 says, as subpostmasters are told:

8 "The main job of the Investigation Division is to
 9 investigate, or help the police investigate, criminal
 10 offences against the Post Office [and others]. The
 11 Investigation Division does NOT enquire into matters
 12 where crime is not suspected.

13 "Most of the crimes dealt with by the Investigation
 14 Division are committed by outsiders. It follows
 15 a common reason for Investigation Division officers
 16 seeking interviews with persons employed is to get help
 17 in clearing up such offences."

18 Then this, paragraph 14:

19 "Although they comprise the minority of all
 20 Investigation Division crime investigations, there are
 21 many cases where the possibility (or even direct
 22 suspicion) arises that persons employed by Post Office
 23 business may be involved. Officers of the Investigation
 24 Division conduct interviews about these suspected
 25 offences and they are requiring to observe the same code

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1 correspondence as to Horizon reliability?

2 **A.** I think that was part of the debate that was had in June
 3 certainly and I think we're all acutely aware of the
 4 interactions that we've had with Fujitsu and clearly
 5 that's something we discussed as part of this
 6 process.

7 **Q.** Thank you. Can we turn to what subpostmasters are told
 8 about who investigates them, and go to the subpostmaster
 9 contract, please. POL00000254. Just so that you know,
 10 this is the post-Horizon Issues Judgment contract.
 11 We'll come back to it later today, or perhaps tomorrow,
 12 for some other features of the contract?

13 **A.** Right.

14 **Q.** Can we look at it in relation to what postmasters are
 15 told about investigations of them, now, however, by
 16 looking at pages 71 and 72. This is section 19 of the
 17 new subpostmaster contract and it concerns, in broad
 18 terms offences committed by subpostmasters, their
 19 suspension, and "Enquiries by officers of the
 20 Investigation Division". You can see that that's the
 21 heading, underneath section 19.

22 **A.** Yes.

23 **Q.** We can just can, if we go down slowly, so you can see
 24 the context of what is going to be said on page 72:
 25 arrests and convictions; immorality; suspension; if we

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1 of conduct when obtaining evidence as that laid down for
 2 police officers. This provides for an officer
 3 investigating a criminal procedure offence to question
 4 any person, whether suspected or not, from whom he
 5 thinks that useful information may be obtained. As soon
 6 as the Investigation Division officer has evidence which
 7 would afford reasonable ground for suspecting that
 8 a person has committed an offence, he must caution him
 9 before asking any questions about that offence. The
 10 caution must be in terms which make it clear that the
 11 suspected person is not obliged to say anything unless
 12 he misses to do so", et cetera.

13 Then 15:

14 "If a subpostmaster or Post Office branch assistant
 15 is questioned as a suspected person by an officer of the
 16 Investigation Division, on statements made by a third
 17 person, and expresses a desire to be confronted by that
 18 person, such confrontation will, if practicable, be
 19 arranged. At the confrontation, the suspect will be at
 20 liberty to question the third person on his evidence and
 21 the questions and replies will be recorded by the
 22 Investigation Division officer."

23 So this describes those conducting the investigation
 24 as the Post Office Investigation Division, and officers
 25 of the Investigation Division.

24

1 Given the history of the scandal dealt with in the
2 judgments of Mr Justice Fraser and the Court of Appeal
3 Criminal Division, and indeed perhaps the Inquiry, is it
4 appropriate that Post Office maintains within the
5 contract the existence of the Post Office Investigation
6 Division?

7 **A.** I must say, I think the wording is heavy-handed in terms
8 of the way it's described and I don't think it reflects
9 the way that we conduct investigations. So I think
10 there is a misalignment and expression "Investigation
11 Division" is not consistent with A&CI. So I would agree
12 with you on that.

13 **Q.** Again, given the history, is it appropriate that the
14 subpostmasters are told that the Investigation Division
15 retains investigative powers that include an evidential
16 interview process under caution?

17 **A.** No, I don't think it is.

18 **Q.** So at least this section of the contract requires some
19 quite radical revision, properly to describe the system
20 for reporting and investigation of possible offences by
21 Post Office to the police, doesn't it?

22 **A.** I would agree.

23 **Q.** Do you know why subpostmasters are told this --
24 admittedly on the basis of the Inquiry survey only
25 15 per cent have got the new contract --

25

1 it would be entirely reasonable to conclude that this
2 section of the contract needs rewording, and it needs
3 addressing -- not just rewording but needs addressing.

4 We're clear that we have work to do on contracts in
5 terms of the specifics and I would say that, back in
6 2019, once we had the judgments handed down, the most
7 important element for me at that stage was to make sure
8 we changed the behaviours within the organisation and
9 then we changed the contract. So -- which is why we did
10 a restatement, rather than a recontracting completely
11 across the organisation. That is still outstanding and
12 that is work that needs to be done.

13 **Q.** Can I turn back, in part, to Project Phoenix and the
14 Past Roles Project, for something that has been said in
15 the course of the undertaking of those two pieces of
16 work and, just by way of some fuller context than was
17 given yesterday, can we look, please, at your third
18 witness statement from paragraph 230 onwards.

19 I'm just going to read in some of the paragraphs of
20 your witness statement by way of context for Project
21 Phoenix and the Past Roles Project. You say in 230:

22 "The background to both Project Phoenix and Past
23 Roles is that in 2022 I raised the issue with Simon
24 Recaldin stating that it was a concern to me and
25 potentially very problematic that there may still be

27

1 **A.** Yes.

2 **Q.** -- but why subpostmasters are told this sort of five
3 years on after the judgments of the High Court?

4 **A.** I would agree with you that it's not consistent with the
5 way that the A&CI team operate. It's not consistent
6 with the way that we conduct investigations in practice,
7 and it's not consistent with the way we support
8 postmasters when they have issues. So I think there is
9 a misalignment, I would agree with you, Mr Beer.

10 **Q.** For a postmaster reading the contract, nothing has
11 changed, has it?

12 **A.** This would not -- as you say the language and the way
13 that it's constructed is not helpful and not reflective
14 of the way the Post Office is operating today.

15 **Q.** So that raises the "why" question --

16 **A.** Yes, it does.

17 **Q.** -- why is it still like this?

18 **A.** And I think that is an entirely reasonable question.

19 We've obviously done some work on contract restatement.
20 We've obviously done some work on addressing the issues
21 that have emerged from the CIJ and the HIJ and made sure
22 that the core tenets of that particular judgment,
23 particularly the duty of good faith and particularly the
24 presumption of innocence and particularly the addressing
25 issues around secrecy and lack of transparency, I think

26

1 colleagues in post who either needed to be investigated
2 themselves or be moved into different roles to ensure
3 confidence is maintained amongst both victims of the
4 scandal and serving postmasters. Some colleagues may
5 have been aware of wrongdoing, or indeed without there
6 being immediate proof of it, have contributed to the
7 wrongdoing. I initiated a piece of work in the
8 organisation to try to get a grip on what the scale of
9 this challenge was and the number of colleagues still
10 working in Post Office and to whom this might apply. We
11 would then need to determine what action to take.

12 "The process was and slow painstaking and to be
13 fair, this was not an easy task. We needed to be clear
14 who was doing what roles and when in the past. We had
15 incomplete HR records which, given this was a desktop
16 exercise to review [1,700] colleagues with over 10 years
17 history in the organisation was a significant challenge.
18 We needed to be clear whether, not only should they be
19 being investigated themselves but also whether even if
20 no evidence of wrongdoing, there were colleagues now
21 involved in activities, like disclosure or administering
22 the compensation schemes, where it would be more
23 sensitive for them to be moved -- anything where it
24 would be better that there was no Postmaster interface.
25 I did not want to cut across rebuilding confidence."

28

1 Then 233:

2 "In terms of Project Phoenix, my own view, one which
3 I believe I share with others, is that for individuals
4 who were actually close to the investigations unit prior
5 to 2015 it is hard to conceive that they were unaware of
6 wrongdoing at that time. I am aware that there were
7 approximately 40 cases that were looked into further
8 following evidence which emerged at the restorative
9 justice meetings, the Human Impact Hearings, and from
10 evidence before the Inquiry. These are case studies not
11 numbers of individuals (ie the same individual could
12 have been involved in a number of cases). As far as
13 I am aware there are now only a handful of individuals
14 who worked in the Investigations Unit which was
15 disbanded in 2015 who are still employed by Post
16 Office -- they do remain in the organisation, but in
17 different roles. Mr Bartlett has provided further
18 information ... I am confident therefore that no one
19 from that era remains in the investigations or audit
20 sections of the business."

21 Then 234:

22 "I recognise, understand and on a personal level,
23 share the frustration that Post Office has not been able
24 to move quicker and go further in respect of Project
25 Phoenix and on Past Roles ... I would have preferred

29

1 POL00448308. This records, by way of context, that:

2 "After [this Inquiry] Compensation Hearing in
3 December 2022, it became apparent that [Post Office] had
4 recruited into its Remediation Unit (RU Team) employees
5 who had previously worked for Post Office in the
6 auditing, investigation, suspension or termination of
7 Postmasters connected to historic Horizon shortfall
8 cases. This risked undermining the integrity of, or the
9 public or postmaster confidence in, the work being done
10 by the [Remediation Unit]. It also put employees 'at
11 risk'."

12 Then:

13 "The aim of the project [and I'm only going to read
14 one] is to:

15 "Review the past roles conducted by colleagues
16 currently employed within the [Unit] and Inquiry teams,
17 to identify any that could be (for want of a better
18 word) potentially problematic. Examples of such roles
19 might include roles in the auditing, investigation,
20 suspension or termination of postmasters connected to
21 historic Horizon shortfall cases. They might be
22 'problematic' because they pose a risk to the integrity
23 or independence of work being done now, public or
24 postmaster confidence in that work, they create
25 conflict, or they place our employees at risk."

31

1 Post Office to take more decisive action and said as
2 much at Board discussions. That is not where the
3 organised however and the collective decision was made
4 at Board not simply to dismiss anyone who was for
5 instance an investigator at the time, but against whom
6 there was no direct evidence of wrongdoing, rather to
7 transfer them to other departments, offer voluntary
8 redundancy where possible, but, where appropriate to
9 thoroughly investigate. The Board was and is
10 collectively concerned about a myriad of other
11 considerations including, importantly I should say, Post
12 Office not acting in a disrespectful way that might
13 resonate with behaviours [in] the past."

14 Lastly, 235:

15 "Post Office understands that unless wrongdoing can
16 be formally and fairly established, it cannot simply
17 remove existing staff because they were in post when
18 miscarriages of justice were taking place. Those
19 individuals of course have employment and indeed human
20 rights themselves. This however is a deeply difficult
21 area and one which I am aware that the Postmaster NEDs
22 feel very strongly about. This is also relevant to
23 [something you say below]."

24 Can we look, please, with that background, to the
25 terms of reference for the Past Roles Project.

30

1 So is essentially this the result or product of the
2 idea which you were the genesis of?

3 **A.** That's correct.

4 **Q.** And what was your principal concern? What was it at the
5 December 2022 compensation hearing?

6 **A.** Well, I think --

7 **Q.** That lit the fire?

8 **A.** Well, I think there were a couple of triggers. I think
9 the first trigger was the reemployment of individuals
10 who had been in the business prior to 2015. I can't
11 specifically recall if that was something that was
12 raised at the compensation hearing, but it was about
13 that time, which was the first trigger for me of
14 concern, is that we were rehiring individuals who had
15 been in the business prior to 2015 in that work, and
16 I think the second element was that, on exploring that
17 with Simon Recaldin and then subsequently with Jane
18 Davies, it became an issue for me, as -- and I think it
19 was crystallised during the compensation hearings, that
20 this might be something that is problematic, and Simon
21 advised that there were individuals within the
22 Remediation Unit who may well have been involved
23 historically in auditing, investigation or activities
24 that were of relevance to this Inquiry.

25 That was a surprise to me, in terms of how we had

32

1 determined and decided to staff the RU, and that was
2 something that, you know, for a myriad of reasons, most
3 of which are contained in the terms of reference here
4 and in the aims of the project, felt problematic for me.

5 **Q.** So can we wind forwards, then, to see what had occurred
6 and the approach that was being taken once the project
7 was up and running, by looking at a Group Executive
8 report which you, I think, sponsored, of 17 January
9 2024. POL00448615.

10 I don't think you wrote this yourself.

11 **A.** No, and the sponsorship, this would have been -- Patrick
12 Quinn works for Karen McEwan, so I think there is some
13 confusion as to why this sponsorship would be me,
14 particularly, but as it's not a -- it's not a function
15 that works for me.

16 **Q.** Right. So you didn't sponsor this report?

17 **A.** No. This report will have come to the Group Executive
18 but it won't have been something specifically sponsored
19 by me.

20 **Q.** So did you have any role in its creation?

21 **A.** No, not in its creation. This report will have come to
22 the Group Executive and I will have been appraised of
23 it, and had an opportunity to pre-read it before the
24 meeting.

25 **Q.** So you would have been a recipient --

33

1 So if we just go up, please. It speaks in paragraph 1
2 as a key theme being that the documentary or the
3 docudrama had generated a lot of focus, including that
4 Post Office continues to employ individuals who were, to
5 some extent, involved in historic suspension
6 investigation and prosecution.

7 Then in paragraph 3, having described in 2 the work
8 that was ongoing, the key theme is said to be:

9 "In carrying out this work we are acutely aware of
10 the duties we owe to our colleagues, and the views of
11 our trade unions."

12 That seems fair enough.

13 **A.** Yes.

14 **Q.** "We also recognise that, in the vast majority of cases,
15 employees who have performed such roles in the past will
16 have carried out their duties according to instructions
17 given to them by the business at the time, and in the
18 belief that Horizon was robust."

19 Do you know the basis for that key theme for
20 communication?

21 **A.** What do you mean by the basis for it?

22 **Q.** An assessment that, in the vast majority of cases,
23 employees within this cohort carried out their duties
24 according to instructions given to them by the business
25 and that they did so in the belief that Horizon was

35

1 **A.** A recipient.

2 **Q.** -- rather than the sender?

3 **A.** That's correct.

4 **Q.** So that's just wrong?

5 **A.** Yes.

6 **Q.** Okay. Might it be because you have told us that you led on
7 the idea, you thought of the problem and you created the
8 work --

9 **A.** Possibly --

10 **Q.** -- that led to the creation of the terms of reference?

11 **A.** Possibly. There is a broader question around the
12 concept of sponsor and line manager that I think is
13 still to be addressed as part of the way that we create
14 reports within the Post Office. The notion of
15 sponsorship and line management gets confused and
16 blurred and I think -- candidly, I think it's obviously
17 having my name in the sponsor's box.

18 **Q.** I just want to ask you about something that's written as
19 the communications theme for the project and it's on
20 page 11 of this document, which is an appendix to it.
21 You can see that it says, "Key themes for comms", and if
22 you just go to the foot of the page you can see what
23 that means by way of footnote, a little bit further.

24 "These are themes for internal communications."

25 Okay? These are themes for internal communications.

34

1 robust?

2 **A.** As in: is the author of this document in a position to
3 make that statement; is that what you're inferring?

4 **Q.** Yes, or --

5 **A.** Yes, I -- it doesn't look precise, from my perspective.
6 I don't know where the author would be able to make
7 that -- or make that assumption, perhaps.

8 **Q.** Is this a reflection of a belief within the General
9 Executive at the time that, although we're undertaking
10 this Past Roles Project, in fact, the majority of the
11 people caught by it will have been doing their job
12 according to instructions, and in a belief that Horizon
13 was robust --

14 **A.** Yeah.

15 **Q.** -- ie we can tell our people, "Although we've got to do
16 this, we know, in fact, that they were just doing their
17 jobs"?

18 **A.** I don't think there was any particular determination of
19 that view. I think one of the sort of themes that has
20 emerged amongst colleagues still working within the
21 organisation is that many of the leaders of the
22 organisation historically who have appeared before this
23 Inquiry, appear not to have been held to account if
24 indeed they were aware of and understood other issues
25 associated with Horizon in the past.

36

1 I think there is -- there was very definitely a view
2 amongst the people community and the authors of this
3 note that people were going about doing their job and we
4 needed to be sensitive to the fact that people were
5 going about doing their job to the best of their ability
6 and with what they knew, as opposed to a specific belief
7 that the statement as has been written here around
8 Horizon being robust, as it's written.

9 **Q.** At all events, was it your understanding that before the
10 Past Roles Project, there had been no internal
11 reflection within the Post Office as to potential
12 employee misconduct?

13 **A.** Reflections by the organisation on this?

14 **Q.** Yes.

15 **A.** There hadn't been, as far as I was aware, certainly when
16 I -- before I joined in 2019, any specific piece of work
17 that had looked into what I think you're suggesting in
18 terms of whether people were aware and what was -- of
19 what happened in the past, no.

20 **Q.** I mean responsive to, for example, the findings of the
21 judge in the Horizon Issues Judgment?

22 **A.** Not in terms of a specific piece of work about who was
23 left within the organisation. I think this is the
24 genesis of that work, and -- of those thoughts, should
25 I say.

37

1 clearly that would be the trigger to take action if
2 necessary, in terms of further investigation; which is
3 indeed what we do.

4 **Q.** Can I turn to a separate thread of correspondence
5 concerning the work on past roles involving the Horizon
6 Advisory Board, by looking at BEIS0000846. This is
7 a separate thread of correspondence concerning the Past
8 Roles Project, disclosed to us by BEIS, involving the
9 Horizon Advisory Board members and Mr Recaldin.

10 Can we look at the top of page 5 and the bottom of
11 page 4, please. Thank you. You can see there an email
12 from Professor Christopher Hodges to Mr Recaldin and
13 others of 18 June this year. You're not on the copy
14 list. He, Professor Hodges, says:

15 "Morning Simon

16 "Hope you are well.

17 "We held a [Horizon Compensation Advisory Board]
18 meeting yesterday, at least semi-informally, and no
19 minutes will be published until a new Government is in
20 place. It is interesting that there are so many issues
21 continuing to require attention.

22 "We noted your letter [I'm not going to go to the
23 letter that triggered this]. Thank you for your kind
24 offer to brief us further ..."

25 This is essentially a letter about the Past Roles

39

1 **Q.** Well, the genesis, you've explained, or the paper has
2 explained, that it was the compensation hearing in
3 December 2022. I'm talking about things that might have
4 been done following the Horizon Issues Judgment of
5 December '19.

6 **A.** Yes, we did -- there was no specific piece of work
7 looking into either individuals who left the
8 organisation or indeed specifically people who were in
9 the organisation at that stage.

10 **Q.** Was that part of a culture that you maybe hinted at when
11 you were being appointed, or describing your
12 appointment, that the organisation should not look too
13 deeply into the past?

14 **A.** Possibly. I think it's more likely that the
15 organisation was conscious that this Inquiry would look
16 very, very explicitly into activities of the past and
17 very explicitly into issues that had occurred
18 historically, in a forensic and thorough manner, and
19 that we would be -- obviously allegations and evidence
20 would be presented that we, as I say and said yesterday,
21 would commit to investigate as a consequence of what
22 emerged.

23 So rather than running two pieces of work in
24 parallel I think the view was very much that explicitly,
25 we would see evidence emerging from the Inquiry, and

38

1 Project.

2 **A.** Yes.

3 **Q.** "... we didn't feel it necessary yesterday, not least in
4 the light of the electoral purdah. But we would be
5 grateful for a further update. We note your ongoing
6 review. The view was expressed that one might expect
7 the answer in relation to individuals (about previous
8 involvement and hence ongoing involvement on
9 subpostmasters and mistress matters) to be either yes or
10 no, so we're intrigued to know more about the substance
11 of the review, and its timing."

12 Then if we scroll up to page 3, please, Professor
13 Hodges continues:

14 "We have two concerns: one is about supporting trust
15 of the victims in the compensation arrangements (and
16 anything else relevant) but the other is about timing,
17 given the extensive ongoing bad publicity emanating from
18 the Inquiry at the same time as the ongoing and imminent
19 new compensation arrangements. Anything you can deliver
20 on the reassurance issue around the involvement of
21 individuals, but also swiftly, would be useful."

22 Were these concerns of the Horizon Compensation
23 Advisory Board raised with you?

24 **A.** I will have spoken to Simon about these issues, yes.

25 **Q.** Were they discussed with the Board in the context of, at

40

1 about the same time, concerns being raised by the
2 Subpostmaster NEDs about the involvement of some
3 individuals in the provision of redress and similar
4 activities?

5 **A.** As we discussed yesterday, this has been a topic of
6 conversation at the SEG and at the Board for some time.

7 This was -- certainly over the summer, this was, and
8 continues to be, a topic of the Board and of the SEG.

9 **Q.** So the Advisory Board's interest in and comments on the
10 Past Roles Project were fed back to the Board; is that
11 right?

12 **A.** I believe they will have been, yes. I mean, this
13 information, I think this is June, so I'm sure at the
14 July board meeting this will have been fed back.

15 **Q.** Similarly, is it right that Government was taking
16 an interest in the Past Roles Project?

17 **A.** Yes.

18 **Q.** Can we look, please, at BEIS0000848. Go to page 3,
19 please, and scroll down. You'll see the Professor
20 Hodges email to Mr Recaldin. Then, if we scroll up, you
21 can see that Mr Cresswell shares that with a group of
22 people within DBT, yes?

23 **A.** Yes.

24 **Q.** Then scroll up, please, to page 2. In answer to the
25 question "Do we have a line on this?", answer in the

41

1 **Q.** Were the concerns raised by the Subpostmaster NEDs
2 passed on by you to Kevin Hollinrake?

3 **A.** I don't recall specifically. The conversations that
4 Minister Hollinrake wanted was reassurance that we were
5 doing work to ensure that there was no danger of
6 confidence from victims of the scandal, or indeed
7 postmasters, engaged in compensation. That was the
8 focus of the conversation.

9 **Q.** Does it give you concern or lingering doubts about the
10 effectiveness of the Past Roles Project and Project
11 Phoenix that neither of them are completed?

12 **A.** It's certainly been very frustrating for me that this
13 process has taken as long as it has. I've not hidden
14 from that frustration for the teams. I do recognise it
15 is an extremely complex area but, notwithstanding that,
16 finding suitable solutions has taken too long.

17 **SIR WYN WILLIAMS:** This is just so that I can be clear I've
18 got the timescale right: the genesis for the work was
19 the December 2022 --

20 **A.** You're correct, sir.

21 **SIR WYN WILLIAMS:** -- compensation hearing, and the evidence
22 over the last few days is that it will be resolved
23 imminently, so we're talking about nearly two years?

24 **A.** Yes, that's correct.

25 **MR BEER:** Did you get a steer from Government as to how to

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1 department, "Not that I can remember!" Suggestion:

2 "The Department has made it clear to the Post Office
3 in the past that it needs to take steps to remove those
4 with involvement in the scandal in any work dealing with
5 redress or appeals. It would be wrong to pre-judge any
6 individuals before the Inquiry has completed its work
7 but we would expect the Post Office to take action
8 against anyone found to have played any ... role in the
9 scandal."

10 Then scroll up, please, some tweaks are made.

11 I have read the tweaks in already. The question raised:
12 "... as this is an HR-type process [would it be]
13 appropriate for Government to comment until [Post
14 Office] has done the work?"

15 Then keep scrolling please, some more discussion
16 about lines for Government and then, if we keep
17 scrolling to the top of the page, please,

18 Ms Brooks-White says in her second sentence:

19 "I assume it came up in monthly discussions between
20 NR [which I think is you] and [Mr] Hollinrake? Is that
21 right?"

22 Did this issue come up in discussions between you
23 and Mr Hollinrake?

24 **A.** Yes, my recollection is it did come up in discussions
25 with Mr Hollinrake.

42

1 approach this issue?

2 **A.** I think my reflection on this is that Simon Recaldin had
3 conversations with the Government team on the ability to
4 offer voluntary redundancy and redundancy payments to
5 try and move people from the Remediation Unit. Those
6 are still ongoing, as I understand it.

7 **Q.** Can we look, please, at a record of one of the meetings
8 held between you and the Minister Kevin Hollinrake MP.
9 BEIS0000739. If we just go to the foot of the page,
10 I think it's the second page, actually, we can see this
11 is an email, I think sent to self, essentially, by
12 Mr Hollinrake's Deputy Head of Office and Private
13 Secretary, Mr Lucas. This is a record, if we go up,
14 please, to the top, of a meeting with you on 23 January
15 2024 and a record was made on 23 January 2024.

16 Now, presumably you won't have seen this?

17 **A.** Yes.

18 **Q.** This is a departmental record made in the way that we've
19 seen by somebody sending an email to themselves, or
20 a corporate account being used to do so.

21 If we just look down the left-hand side we can see
22 some initials: "NR", obviously you; is that right?

23 **A.** That's correct.

24 **Q.** "KH", Kevin Hollinrake?

25 **A.** Yes.

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1 Q. "CFO"; can you see that?
 2 A. Yes.
 3 Q. Is that a person or the person's initials, or it's the
 4 Chief Finance Officer?
 5 A. I think it will be Kathryn Sherratt, the Interim Chief
 6 Financial Officer.
 7 Q. Okay. So they've been referred to by their job title --
 8 A. Job title.
 9 Q. -- rather than their initials?
 10 A. It would seem so.
 11 Q. "LG", if we just scroll down a bit, you can see some LGs
 12 towards the bottom of the page; is that Lorna Gratton?
 13 A. Yes, that would be Lorna.
 14 Q. So she, I think, was at this time a senior civil servant
 15 in UKGI and on the Post Office Board as the Shareholder
 16 NED?
 17 A. That's correct, and she still is, yes.
 18 Q. "SR", we see a bit of him coming into the discussion.
 19 Can you see there, Simon Recaldin, presumably?
 20 A. That's correct.
 21 Q. Some "CCs" there as well, Carl Creswell?
 22 A. That's correct.
 23 Q. We know the function that he performed.
 24 If we just go up, please, to the top, there's some
 25 discussion about the Select Committee appearance and

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1 Need to work through how the differences arose in the
 2 first place. Do we wish to refine our review
 3 internally, or do we want external support to pick up
 4 where the prior review left off? Irrespective, we need
 5 to be comfortable with the current process with this
 6 type of difference with the current system. I get the
 7 urgency."
 8 Then she continued:
 9 "PwC are our current auditors. KPMG were brought in
 10 for that particular review."
 11 Mr Hollinrake wants to get something in the public
 12 domain within a month.
 13 You are recorded, and Ms Sheratt, to say: "We've got
 14 to."
 15 You say: "We've got 8 days before the end ... of the
 16 Inquiry."
 17 I'm just reading this incidentally by way of context
 18 for the meeting, rather than just going into a bit of
 19 it.
 20 A. Right, sure.
 21 Q. "... 8 days before end of ... the Inquiry. We will have
 22 to have a position before Phase 5."
 23 Is that you saying that, "We, the Post Office, will
 24 have to have a position on where the money went before
 25 the beginning of Phase 5"?

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1 what Post Office will respond to the Committee.
 2 Mr Hollinrake said:
 3 "Get it is your job to look forward."
 4 You: "Clear it is simply not my position to opine
 5 and pass judgement on predecessors."
 6 He says: "... there are things you could have
 7 pointed out but I take your point."
 8 You say: "Don't want to go out there celebrating
 9 what we've done in the past 4 years, doesn't feel right.
 10 Don't want to pontificate from the pulpit on what we've
 11 done."
 12 Mr Hollinrake: "Key thing we've got to do is
 13 legislate for the convictions, not straightforward for
 14 various different reasons. One commitment I've made to
 15 various colleagues, is where the money went."
 16 In context, is that a reference to the issue of
 17 where money paid by subpostmasters --
 18 A. That's correct.
 19 Q. -- in purported satisfaction of a shortfall ended up --
 20 A. I think that's correct.
 21 Q. -- in Post Office accounts?
 22 A. Indeed.
 23 Q. Ms Sheratt replies:
 24 "KPMG had a look and that info has been passed to
 25 the Inquiry. Some other analysis has been done as well.

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1 A. I think it certainly reads that way, yes.
 2 Q. Was that your view?
 3 A. I think I was frustrated, as many people are and have
 4 been, at the inability to answer this question in a way
 5 that was -- in a way that was accurate. This particular
 6 challenge had been out there for some time, the sort of
 7 "Where did the money go?", question, as it was described
 8 in many of the media outlets, and I think we had
 9 employed, I think, two or three external forensic
 10 accountants over the years, certainly prior to my time,
 11 to try and get under the skin of this, and it seemed
 12 peculiar to me that we were unable to get a fix, even
 13 with caveats around its level of accuracy, so that we
 14 could at least in part give people some confidence that
 15 we understood the size and scale of this issue, or got
 16 to the bottom of it.
 17 Q. Lorna Gratton says: "Probably need to understand the
 18 order of magnitude."
 19 You are recorded as saying:
 20 "Clearly the business employed Wilmington ..."
 21 I think that's Ron Warmington:
 22 "... and Second Sight to do some work on this
 23 previous, may be some merit in speaking to them."
 24 Then Mr Hollinrake recorded as saying:
 25 "Real opportunity to draw a line under this more

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1 quickly. We've been asking for things from other parts
2 of Government for some time. Anything we can do to
3 accelerate payments we would like to do. Do still here
4 from AB ..."

5 Maybe --

6 **A.** Advisory Board?

7 **Q.** Advisory Board, yes:

8 "... that lawyers are arguing about a few hundred
9 [that's probably 'quid'] here and there. I do not want
10 lawyers on either side slowing it down. We are under
11 pressure to bring it back into DBT, we want you to
12 deliver on them. Give the benefit of the doubt to
13 postmasters."

14 There's more discussion on the HSS and the
15 introduction of service level agreements, the use of
16 without prejudice in correspondence. Mr Hollinrake says
17 that he thinks it was a big mistake to keep Herbert
18 Smith Freehills involved in the scheme.

19 Mr Recaldin says: "We are proactively phasing them
20 out."

21 Then, if we go over the page, please, you are
22 recorded in the third line as saying:

23 "Robert Daily today ..."

24 Indeed, he was a witness on that day.

25 "... Post Office Investigator. Biggest question for
49

1 Mr Hollinrake says: "I'm not a big fan of paying
2 people off. Ideally we go through a process."

3 CFO: "What we are grappling with is create a bit of
4 distance from the people who are implicated somehow and
5 those that are still in the business and that is
6 tainting it."

7 Then Mr Hollinrake says:

8 "I don't mind if we end up in an Employment
9 Tribunal."

10 Was that him signalling the approach to be taken
11 here: that the Post Office should take robust action,
12 even if it meant ending up on the wrong end of
13 an Employment Tribunal claim, brought by a dismissed
14 employee?

15 **A.** It does sound like it.

16 **Q.** Was that the approach taken?

17 **A.** No, I don't think we've been as robust as that.

18 **Q.** Was this not the Government giving you the green light
19 to be robust?

20 **A.** Yes, I think it is and, as I mentioned before, I think
21 we've dragged our feet in terms of being very, very
22 specific about this.

23 **Q.** I mean the issue is the potential for individuals who
24 still may be operating at the heart of Post Office who
25 were implicated in events in the past, isn't it?

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1 me is we need some autonomy in dealing with people,
2 rather than us coming back to you or [the Treasury], we
3 need a warchest, effectively."

4 Can you help us as to what you were describing
5 there?

6 **A.** Yes, we needed some financial support and guidance in
7 terms of the ability to move individuals on from the
8 organisation who were involved in the scandal, and we
9 wanted to do that as quickly and efficiently as
10 possible. That might be through redundancy, that might
11 be through a settlement, that might be through some
12 other substantive reason to move people on, rather than
13 going into, potentially, issues where we might sort of
14 fall foul of the unions, or the like, and so I think the
15 point I was trying to make was that we wanted to move
16 more quickly without having to refer back to the
17 Government for funding to do such a thing.

18 **Q.** Lorna Gratton is recorded as saying:

19 "For those who appear publicly you might have
20 bringing the business into disrepute defence, but not
21 those that don't appear publicly."

22 You're recorded as saying:

23 "There's reputational damage that could be done here
24 and we want to be able to signpost this to stakeholders
25 that we won't sit on the fence on these issues."

50

1 **A.** That is the case and, as I have been very clear, where
2 we get formal allegations, we will act. Pre-emptively,
3 we have struggled to move people on from the
4 organisation.

5 **MR BEER:** Thank you. Sir, I'm about to move to a separate
6 subtopic, could we break for 15 minutes until 11.40,
7 please.

8 (11.22 am)

9 (A short break)

10 (11.40 am)

11 **MR BEER:** Thank you, sir.

12 Mr Read, I suspect, with your familiarity with the
13 issues in the Inquiry and the time that you've spent
14 preparing to give evidence in this phase, you will know
15 that one of the issues explored by the Inquiry is the
16 facility for the Post Office and/or Fujitsu to have
17 remote access to branch accounts --

18 **A.** Correct.

19 **Q.** -- and a sub-issue, an exploration of what the Post
20 Office has said across time about its and Fujitsu's
21 facility to have access to branch accounts, yes?

22 **A.** Yes.

23 **Q.** A third area of exploration is, or has been, who knew
24 what about remote access and when?

25 **A.** Yes.

52

1 Q. No doubt you either heard, read or were briefed about
 2 the evidence of Ms van den Bogerd, Angela van den
 3 Bogerd, concerning her knowledge of remote access and
 4 what she has said across time about the facility for
 5 remote access to branch accounts?
 6 A. Yes.
 7 Q. Can we look, please, at POL00294728. This is an email
 8 from a long time ago, before you were in post, pre-dated
 9 your appointment by more than eight years, and it's
 10 an email from Tracy Marshall -- can you see --
 11 A. I can, yes.
 12 Q. -- to Kevin Gilliland and Angela van den Bogerd about
 13 Horizon system issues. It's 5 January 2011 and, if you
 14 just look at the foot of the page, in fact, I think it's
 15 on the second page, you'll see that it's signed off by
 16 Tracy Marshall, Agents Development Manager within
 17 Network & Sales.
 18 If we just go to the top, please, she says that she
 19 has made some pages on the outstanding questions. Then
 20 the second of those is, "[Post Office] or Fujitsu having
 21 remote access to individual Horizon systems", and she
 22 says:
 23 "[Post Office] cannot remotely access systems and
 24 make changes to specific stock units etc. Fujitsu can
 25 remotely access systems and they do this on numerous
 53

1 issue was quickly identified and a fix put in place but
 2 it impacted around 60 branches and meant a loss/gain
 3 incurred in a particular week in effect disappeared from
 4 the system. One solution, quickly discounted because of
 5 the implications around integrity, was for Fujitsu to
 6 remotely enter a value into a branch account to
 7 reintroduce the missing loss/gain. So [Post Office]
 8 can't do this but Fujitsu can."
 9 One of the issues that we've been exploring is the
 10 consistency of the accounts, or accuracy or reliability
 11 or truthfulness of the accounts that Ms van den Bogerd
 12 has given, in light of the fact that she was provided
 13 with this information, as, it seems, was Tracy Marshall.
 14 We've seen what she said in the first email that
 15 I have shown you, which, on one view, doesn't really
 16 reflect what is set out here.
 17 A. Mm.
 18 Q. You tell us in your witness statement -- this is
 19 paragraph 238 of your third witness statement -- that
 20 a person called Tracy Marshall, as the Postmaster
 21 Engagement Director, was the person who briefed you
 22 about the investigation of Elliot Jacobs?
 23 A. Yes, I did, yes.
 24 Q. The email can come down. Thank you.
 25 Is that the same Tracy Marshall that is engaged in
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1 occasions on a network wide basis in order to remedy
 2 glitches in the system create as a result of new
 3 software upgrades.
 4 "Technically, Fujitsu could access an individual
 5 branch remotely and move money around however this has
 6 never happened yet. The authority process required
 7 audit process are robust enough to prevent this activity
 8 from being undertaken fraudulently."
 9 Concluding:
 10 "So although changes can be made remotely, they
 11 would be spotted and the person making the change would
 12 be identified."
 13 If we look, please, at POL00088956, we can see
 14 an even earlier email, which email has secured some
 15 significance in the Inquiry, an email from Mr Breedon to
 16 Ms van den Bogerd, dated December 2010, and you can see
 17 that Ms Marshall was a copyee, yes?
 18 A. Yes, that's correct.
 19 Q. If we just scroll down, and a bit more please, we see
 20 cut into this email chain an email sent previously by
 21 Lynn Hobbs, in which it was said that:
 22 "I found out this week that Fujitsu can actually put
 23 an entry into a branch account remotely. It came up
 24 when we were exploring solutions around a problem
 25 generated by the system following migration ... This
 54

1 these investigations and discussions about remote
 2 access?
 3 A. Yes, it is.
 4 Q. What position does she hold; is it Network Development
 5 Director?
 6 A. That's correct.
 7 Q. Can we look, please, at WITN11610100.
 8 This is Ms Marshall's witness statement of 22 August
 9 and it's a corporate witness statement, it's on behalf
 10 of the Post Office. If we scroll down, she says that
 11 she is, in fact, the Retail Engagement Director.
 12 A. Yes.
 13 Q. Her areas of responsibility cover postmaster onboarding,
 14 training, contract teams. If we scroll on, please, she
 15 says that she is responding to two Rule 9 Requests
 16 addressed to the Post Office. If we scroll down, and
 17 keep going, we can just scan this. Then "Definitions",
 18 then keep going.
 19 So just going up, you can see the first question
 20 that she addresses "current [subpostmaster] contract ...
 21 set out in detail" changes made.
 22 Then, if we scroll on, please. Keep going. It's
 23 quite a long witness statement. I just want you to see
 24 the coverage of it.
 25 A. Right.
 56

1 Q. If we keep going, please. We asked to identify relevant
2 changes made in the light of Mr Justice Fraser's Common
3 Issues Judgment, essentially.

4 Then if we keep going:

5 "... the process by which [subpostmasters] were
6 notified of relevant changes", section 2.

7 Then if we scroll on, please:

8 "... process by which new [subpostmasters] are
9 notified of the terms and conditions ..."

10 Scroll on, please, terms of the contract, and their
11 negotiation, whether that's permissible and what's the
12 process.

13 Scroll on, please. If we just scroll to get the
14 full heading of this section of the witness statement,
15 "Induction and Ongoing Support for Postmasters and
16 Assistants", ie "Please provide details of the training
17 now given to [subpostmasters]", et cetera.

18 If we scroll on, please. I think this is quite
19 a long section, so we can scroll on quite fast:

20 "... details of any key guidance, policies, training
21 or instructions given to those responsible for
22 delivering training."

23 Then carry on scrolling, please:

24 "which department(s) hold responsibility for [such]
25 policies and guidelines ..."

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1 Scroll on, please:

2 "Which department(s) hold responsibility for [such]
3 policies ..."

4 Then a new section:

5 "... all the avenues available to [subpostmasters]
6 to raise queries or questions about Horizon", and about
7 the Business Support Centre.

8 Then scroll on, please:

9 "... current process [a subpostmaster] goes through
10 when they raise a balancing issue and seek assistance to
11 resolve it ...

12 "... policies, guidance, training or introduction
13 for those operating the [centre] since the findings of
14 Mr Justice Fraser."

15 If we continue:

16 "Which department(s) hold responsibility for [those]
17 policies ..."

18 Then 18:

19 "... details of the experience [et cetera] of those
20 responsible for operating the helpline ...

21 "... how ... the advice provided by the helpline is
22 monitored, reviewed or checked ..."

23 Then carry on, please:

24 "... how ... calls raised with the helpline are
25 monitored, reviewed and/or checked to identify any

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1 Then 8:

2 "... details of the experience, expertise and
3 qualifications of those currently responsible for
4 delivering training ..."

5 I'm not showing you or asking you to look at the
6 responses to these, just showing you the coverage.

7 10:

8 "... any key reports, reviews or investigations ...
9 which address quality of training provided ..."

10 Then scroll on, please:

11 "... details of any feedback sought or engagement
12 undertaken ... in relation to their training on the use
13 and operation of Horizon ..."

14 Scroll on, please:

15 "To what extent are [subpostmasters] expected to
16 train their own managers and assistants ..."

17 13:

18 "[Any] provision within [Post Office] for
19 [postmasters], managers and/or assistants to raise
20 issues about the provision or efficacy of training ..."

21 Then scroll on, "Contractual liability for
22 Shortfalls":

23 "Key policies and [guidance] relating to the
24 liability of [postmasters under the contract] and other
25 end users for shortfalls ..."

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1 potential issues in branches", in relation to
2 particularly shortfalls, bugs, errors and defects.

3 Then carry on:

4 "To what extent ... are branches proactively
5 notified of [bugs, errors and defects]?"

6 Then carry on, please:

7 "... sources of advice or assistance made available
8 to [subpostmasters], managers and assistants ...

9 "... any ... reports, reviews or investigations ...
10 which address the quality of the advice and assistance
11 provided via the helpline ...

12 "... the means by which [a subpostmaster,
13 et cetera], can provide feedback on their experiences
14 [of] using the helpline ...

15 "... measures ... in place to ensure that
16 [postmasters, et cetera] who contact [Post Office] for
17 assistance ... receive useful, tailored advice."

18 A section on "Suspension, Reinstatement and
19 Termination", and then continue; and continue; and
20 continue; and continue.

21 That's it, keep going, thank you.

22 Thank you. Stopping there.

23 Ms Marshall is providing the Inquiry with
24 information, the retention of subpostmasters, retention
25 of Post Office employees, including in relation to their

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1 potential association of past wrongdoing. She's
2 essentially the Post Office witness that's speaking to
3 that issue.

4 She is a person who, on one view, is involved or
5 implicated in the remote access issue, and yet she's
6 a corporate witness for the Post Office; do you see
7 a problem?

8 **A.** The issue emerged in the summer, which was the first
9 time, I think. The last time we -- the last time the
10 Inquiry was sitting and these emails emerged, we invited
11 Tracy to step back from her day-to-day role while we
12 tried to understand the significance of and the extent
13 of any involvement that she had. She was very clear
14 that she was unaware of remote access being actioned.
15 She said she was aware that remote access was possible
16 but not whether or not it was enacted in any way.

17 There were, I think, a couple of emails that we've
18 just been through and a line manager suggested to her
19 that she take a step back from postmaster-facing
20 activity so that confidence could be retained, and
21 indeed provide the opportunity for us to examine any
22 further whether or not there was something substantive
23 with which she had to -- to respond to.

24 **Q.** She hasn't really taking a step back though, she's taken
25 a step forwards, hasn't she, because she's provided

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1 of issues that I've just quite slowly taken you through?

2 **A.** Yes, I can see the point you're trying to make. I think
3 the point I'm trying to make is that my desire was that
4 she wasn't involved in activity that was specifically
5 postmaster facing, so running of forums, listening
6 groups, engagement with postmasters, as opposed to, and
7 by definition therefore, the day-to-day running of her
8 role. However, she had spent the previous four years in
9 that role and had created a lot of the change that has
10 been initiated by the Post Office and, therefore, she is
11 best placed to speak to it, and clearly the Inquiry will
12 speak to her, given that that is her role.

13 I don't think it is inconsistent to remove her from
14 coming to the Inquiry to give evidence on the work that
15 she's done and, you know, if you have questions about
16 other elements of her role going back over time, I'm
17 sure the Inquiry will explore that. As I said earlier,
18 we have been very clear that, where allegations are
19 made, we will investigate those and we will do that.
20 But it is a presumption of innocence in the same way as
21 it would be now for a postmaster as well, and I think
22 it's important that we continue to maintain that.

23 I certainly have a responsibility to all my
24 colleagues, as well as to postmasters, and I think it's
25 appropriate that the balance -- and it's a fine

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1 a corporate witness statement to us and is giving
2 evidence, I think, next week?

3 **A.** Well, my point at this stage was that there is no
4 concrete evidence of any wrongdoing and, as
5 a consequence of that, we want to obviously treat her in
6 exactly the same way as we would anybody else, which is
7 explore any allegations that are being made but, in
8 reality, she is the individual who is best placed to
9 write that corporate witness statement and that is
10 exactly what she's done. But, at the same time, we're
11 clear that, for the confidence of postmasters, both past
12 at present, it's inappropriate for her to be involved in
13 activity that is postmaster facing while the Inquiry is
14 still ongoing, and while we can and will explore whether
15 there is anything that she needs to answer to.

16 **Q.** Is there anything more postmaster facing than giving
17 evidence in the Inquiry on behalf of the Post Office as
18 a corporate witness?

19 **A.** I'm not quite sure I understand what you're getting at.

20 **Q.** You said you invited her to take a step back from
21 postmaster-facing activity?

22 **A.** Yes, correct.

23 **Q.** Is it not postmaster-facing activity to come along and
24 sit in the seat that you're sitting in, give evidence on
25 behalf of the Post Office in relation to a whole range

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1 balance -- that we have adopted in terms of asking her
2 to step back from day-to-day activity, maintaining the
3 fact that she has done and has spent the last four years
4 involved in activity which will be explored by this
5 Inquiry, and then giving her the chance to come and
6 speak to that well, which I think is a sensible way to
7 progress. And we've been very clear that where people
8 have been invited to step back at the conclusion of the
9 Inquiry, and whenever allegations, if they are made, are
10 made, we will continue to act.

11 **Q.** Thank you. Can I turn to, again, a sub-issue we
12 addressed previously yesterday: namely, having
13 subpostmasters as NEDs on the Board?

14 **A.** Yes.

15 **Q.** You address this with a sort of qualitative assessment
16 in paragraph 83 of your third witness statement --

17 **A.** Right.

18 **Q.** -- if we can turn that up and have a look at it. So
19 WITN00760300, thank you, page 46. It's paragraph 83.
20 You say:

21 "In respect of the Board, Postmaster Non-Executive
22 Directors have been an important part of trying to
23 invert this dynamic. They bring a detailed and relevant
24 understanding of current day matters to Board meetings
25 in a uniquely creditable way. This ensures

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1 a transparency of issues and an agreed and collective
2 understanding across the organisation of the most
3 important priorities."

4 Then you go on to consider something slightly
5 separate.

6 **A.** Yes.

7 **Q.** You give the impression, would you agree, that having
8 the Postmaster NEDs on the Board has been a positive
9 thing?

10 **A.** I think it's been very positive and I've been very
11 consistent with that. I think it's an important part of
12 the change that we've been trying to bring about at the
13 Post Office. I was the champion of bringing Postmaster
14 NEDs onto the Board. It is and was a feature of the
15 role that I had at Nisa where I had a combination of
16 independent Non-Executive Directors and Member
17 Directors -- Non-Executive Directors, and that makes --
18 worked well.

19 **Q.** Can we look, please, at BEIS0000753. This is a readout
20 of a meeting between you and other members of the Post
21 Office Executive. So Ms Sheratt, Mr McInnes and, on the
22 other side, Lorna Gratton, Carl Creswell, Jamie Lucas --
23 and I should say Mr Hollinrake too.

24 **A.** Yes.

25 **Q.** We can see his private secretary is also recorded as

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1 **Q.** "Anything else you think we need to make it easier?"

2 You say you're looking to Lorna Gratton:

3 "Need as much support as you can get from Ben
4 Tidswell to try to get the Board functioning properly.
5 We need to try and find a way through the Project
6 Pineapple memo."

7 That's the inadvertently disclosed email?

8 **A.** Yes, that's correct, yes.

9 **Q.** You're recorded as saying:

10 "We'll have a Board meeting tomorrow and see where
11 we can get to. Postmaster NEDs may use tomorrow as
12 an [opportunity] to criticise on funding and
13 anti-postmaster sentiment. Need to avoid tomorrow
14 morning being a proper road crash."

15 Ms Sheratt: "Had a bit of a flavour of it on Monday,
16 they think it did not do enough for postmasters. Elliot
17 mentions where the investment for the future of the
18 business and postmaster rem is front and centre, costs
19 are rising, and this has been a theme of theirs for
20 a while."

21 Then you're record as saying:

22 "This goes back to whether the postmaster directors
23 are playing a role of a director, or of a trade union
24 rep. I don't know where that is going to go. They are
25 extremely exposed as a result of Project Pineapple. Not

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1 being present. I just want to, again, read a little bit
2 of context. You say:

3 "Pleased with our session ..."

4 Is that referring to the session before the Select
5 Committee? Just look at the date at the top.

6 **A.** Yes, I think there were two Select Committee meetings,
7 one in January and one in February, and I think this one
8 is referring to the --

9 **Q.** To the second?

10 **A.** -- to the February one, yes.

11 **Q.** You say you were pleased with your session:

12 "... and felt a bit like the rug got pulled from
13 beneath us."

14 Mr Hollinrake is reported as saying:

15 "It's fair to say, at a certain point in time, have
16 to take the gloves off and try to manage the
17 [information]. I think the Select Committee were weak
18 with him, apart from Antony Higginbotham. Sorry it was
19 so messy. Keen to support in any way we can to make
20 sure we get passed [*sic*] this. Hope he's discredited."

21 Is that a reference to Henry Staunton?

22 **A.** That's correct, yes.

23 **Q.** So the Minister was saying that he supposed Henry
24 Staunton was discredited?

25 **A.** That's correct, yes.

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1 sure to patch this up. In a slight stand off."

2 Then Ms Gratton: "They are not in a good place and
3 aren't operating in a way appropriate for the business."

4 You ask: "How can they ensure their own
5 self-interest doesn't cut across their role in
6 supporting [Post Office] as a business?"

7 This doesn't seem to record such a rosy picture of
8 yours of the Subpostmaster NEDs.

9 **A.** I think it's a moment in time and I think we've heard
10 a lot about Project Pineapple in this environment. What
11 I would say is the point of the postmaster directors on
12 the Board is to be challenging, is to bring a tactical
13 view of what is going on the ground, and I went into
14 this with my eyes open, fully knowledgeable that this
15 would be uncomfortable. The big challenge for the
16 Postmaster NEDs, of course, is that they are elected to
17 the Board, unlike anybody else, who is appointed to the
18 Board. So as an elected representative on the Board,
19 voted for by other postmasters, they've got a very dual
20 challenge of, on the one hand feeling that they are
21 representing postmasters, whilst, at the same time,
22 recognising they have duties as Directors of Post
23 Office, and that provides conflict.

24 Not unsurprisingly -- and you heard from both Saf
25 Ismail a couple of weeks ago, I think Saf suggested he

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1 was working anything up to ten days a month on this --
 2 not unsurprisingly, many postmasters were looking to
 3 them and constantly looking to them to say, "What have
 4 you done? What have you done? What are you doing?"
 5 And I think that is the challenge we have had, and Saf
 6 and Elliot have faced considerable pressure from their
 7 peer group, whilst at the same time having to recognise
 8 that they have got to -- and they have duties directors
 9 of the Post Office. And so it is a tricky play.

10 There is no question that this time -- and you'll be
 11 very familiar with this -- that this time was a very
 12 difficult pod for the Post Office, the departure of
 13 Henry, the exposure of the Project Pineapple email, the
 14 challenges that the Postmaster Non-Executive Directors
 15 felt, but also they were coming to the end of their term
 16 at this stage. This is the three years, and I think
 17 they felt very keenly that they wanted to be able to
 18 demonstrate they'd made a real difference and I do
 19 believe that to be the case but I think it was something
 20 that was playing on their minds as well.

21 **Q.** When did you start becoming concerned that they may not
 22 be acting as directors but instead as trade union reps?
 23 **A.** I mean, I don't think we should make too much of this.
 24 I don't think that is a major issue. I think one of the
 25 challenges that this role has, it's exactly what

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1 described it, is an additional matter?
 2 **A.** It is an additional matter, but I think the primary
 3 matter that is being discussed in this email is, and was
 4 from my perspective, how do we bring some stability and
 5 cohesion to the Board, given we'd lost the Chairman and
 6 we had two main Board Directors who were
 7 disenfranchised? Less about what they were
 8 disenfranchised with and more about the personal
 9 circumstances they were in.

10 It was my interpretation of what was going on and
 11 what I wanted to try to create was an environment where
 12 we had got a sense of collegiality and a sense of
 13 stability at a Board level. It was quite apparent that
 14 this was causing a disquiet, amongst the organisation,
 15 it was being played out in public, and it was, as
 16 I think I mentioned before, pretty unedifying and
 17 unhelpful for the direction of business.

18 **Q.** At this time the Post Office was putting a public
 19 message that it was putting subpostmasters at the heart
 20 of its business, including by having Subpostmaster NEDs
 21 on the Board, wasn't it?

22 **A.** I don't think it was necessarily at this particular
 23 moment doing that. I think postmasters had been on the
 24 Board for almost three years before to this -- prior to
 25 this particular situation. So I'm not sure that's

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1 I experienced, that Nisa was trying to get that balance
 2 between representing postmasters, as I've mentioned, and
 3 actually fulfilling a role as a director. It's
 4 an ongoing issue, an ongoing challenge and very
 5 difficult, in fact virtually impossible, to draw a line
 6 between the two, and I think it requires very sensitive
 7 navigation from them, very sensitive navigation from
 8 other Board members and, indeed, obviously, from me, in
 9 terms of making sure that we get the best from the
 10 Postmaster Non-Executive Directors.

11 **Q.** What did you understand to mean by "trying to find a way
 12 through the Project Pineapple memo"?

13 **A.** My understanding of that, and what was on my mind at the
 14 time, was we'd just lost our Chairman in very difficult
 15 circumstances. I think the -- I think everybody was
 16 acutely conscious of the manner of Henry's departure,
 17 and the publicity that was associated with that. We had
 18 two Non-Executive Directors who were concerned about the
 19 exposure of the Project Pineapple email.

20 **Q.** I think before that, they were concerned about the
 21 conduct of three member of the General Executive?

22 **A.** They were.

23 **Q.** That was the substance of their concern?

24 **A.** That was the substance.

25 **Q.** The inadvertent disclosure of the email, as you

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1 necessarily a fair characterisation.

2 **Q.** To what extent were the Board, including the
 3 Non-Executive Directors, updated on the contact that you
 4 and other members of the Executive were having with the
 5 shareholder?

6 **A.** I report back on the detail of the shareholder meeting,
 7 and when there are specific issues that emerge,
 8 I invariably take my Corporate Affairs Director with me
 9 to these meetings on a monthly basis and notes of those
 10 meetings are then shared with either the Chairman or
 11 indeed with the entire Board, depending on the content
 12 that is required.

13 So that would happen after each of the ministerial
 14 meetings and, of course, I would refer to the
 15 ministerial meetings in my CEO reports to the Board, of
 16 which many have been displayed.

17 **Q.** You'll remember that one of Grant Thornton's criticisms
 18 was the extent to which the shareholder's input was
 19 diving decision making and performance of Post Office?

20 **A.** Yes.

21 **Q.** So to what extent were the Board, including the
 22 Non-Executive Directors, sighted on exchanges such as
 23 this?

24 **A.** On the sort of mechanics of what is going on in here,
 25 probably less about the mechanics. If there are things

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1 that are matters of substance then, of course, those are
2 issues that we would share with the Board.

3 **Q.** Did you share the view that Ms Gratton expressed that
4 the Subpostmaster NEDs were not operating in a way
5 appropriate for the business?

6 **A.** Did I share that with?

7 **Q.** Did you share that view?

8 **A.** Oh, sorry, did I share that view?

9 **Q.** Yes, did you hold that view?

10 **A.** No, I think my experience of the Postmaster NEDs is
11 that, you know, they are naturally challenging,
12 challenging of me and I'm open to that challenge.

13 **Q.** Mr Ismail has given evidence to us that he believed,
14 after the departure of Mr Staunton, that responsibility
15 to heal the rifts in the Board after Project Pineapple
16 was placed upon the two Subpostmaster Executives; Is
17 that correct?

18 **A.** I don't think explicitly that was necessarily the case.
19 I think clearly, as main Board Directors, they have
20 an opportunity to engage with members of the Group
21 Executive and, by definition, you know, I think they
22 share some responsibility to try to move that agenda
23 forward. I don't think it's necessary that the Chairman
24 has to do it, or that the SID has to do it. I think
25 everybody has a responsibility to try to ensure that we

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1 surrounding Henry's departure clearly didn't help.

2 **Q.** Thank you. Can we move to a new topic --

3 **SIR WYN WILLIAMS:** Before we do, Mr Beer, just to clear my
4 mind.

5 I think you were present when Ms Scarrabelotti gave
6 evidence, yes?

7 **A.** I was, sir.

8 **SIR WYN WILLIAMS:** In relation to Postmaster Non-Executive
9 Directors, she was asked some questions about that.

10 **A.** Yes.

11 **SIR WYN WILLIAMS:** I'm not pretending that these were her
12 words, all right, but she seemed to be suggesting,
13 I think, that the current serving postmasters had a very
14 important role to play but perhaps not as members of the
15 Board? Do you remember her giving that --

16 **A.** Yes.

17 **SIR WYN WILLIAMS:** I just wondered what your view of that
18 was, if you have one?

19 **A.** Yes, I do, Sir Wyn. I do believe that they have a role
20 to play on the Board. I think we were in a situation
21 with no other operators/retailers on the Board, other
22 than effectively myself and the two Non-Executive
23 Directors, and I think it gave reassurance to other
24 Board members that they had a tactical understanding of
25 what is going on, on the ground, in that forum, and that

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1 get a sense of stability and cohesion back on to the
2 Board. So I don't think it was any one person's
3 responsibility.

4 **Q.** Did you leave it to them, the two Subpostmaster NEDs, to
5 build bridges with Mr Foat and Mr Richards?

6 **A.** On reflection, I probably did give them too much of
7 the -- too much of the onus was placed upon them.

8 I think that's probably a fair reflection. I think at
9 this time, not unsurprisingly, we were under enormous
10 amounts of pressure as an organisation, and my
11 reflection is that I probably could have done more.

12 **Q.** It was your actions that, in particular, had left them
13 exposed to a response or reprisals from those against
14 whom they made allegations, wasn't it?

15 **A.** Well, as we discussed yesterday, it was an inadvertent
16 mistake, and we've been through the mechanics of how
17 that mistake occurred. I also expressed my apology to
18 them within 12 hours of the event occurred. So I don't
19 think it's fair to characterise it in that way. I think
20 it was -- as I say, an inadvertent mistake. It was
21 disappointing that it had occurred, I was keen to make
22 sure that we moved on and it obviously didn't -- we
23 obviously didn't move on as quickly as that would
24 have -- as would have been helpful. But,
25 notwithstanding that, I think that the scenarios

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1 they would challenge me in particular on issues that we
2 were implementing.

3 So I think it was a really important part of the
4 development that we've had over the last three years to
5 have the Postmaster Non-Executive Directors being in
6 a position where they could challenge the change that
7 was being implemented into our business.

8 **SIR WYN WILLIAMS:** All right, thank you.

9 Sorry, Mr Beer.

10 **MR BEER:** In fact, on that topic, we could go back and look
11 at BEIS0000753.

12 This was the note of the meeting you held with
13 Mr Hollinrake and others on 29 February and, if we just
14 scroll down -- and a bit more, please, stop there --
15 I left off examining the memo with Lorna Gratton saying:

16 "They are not in a good place and aren't operating
17 in a way appropriate for the business".

18 You said: "How can they ensure their own
19 self-interest doesn't cut across their role in
20 supporting [Post Office] as a business."

21 Then if we scroll on, please, six paragraphs from
22 the bottom, eight paragraphs from the bottom, Lorna
23 Gratton says:

24 "I don't think postmaster oversight of the Board is
25 worth it, I think there's good mileage for more

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1 postmaster input in the retail [side] of the business."

2 Did you understand it to be her view that having
3 postmasters on the Board was not worth it but there was
4 more value in having them have some other input, as it's
5 called, in retail?

6 **A.** Not quite. I think what we were -- or what was being
7 described here is the Voice of the Postmaster and the
8 NFSP, as I recall, were progressive a concept of an
9 oversight Board that sat above the main Board of the
10 Post Office, and played a strategic role in shaping the
11 direction of travel. So I think that is what the
12 oversight of the Board, which would be populated by
13 people from the CWU, ministerial colleagues, potentially
14 postmasters as well. So I think that is what is being
15 described here by way of postmaster oversight of the
16 Board.

17 From a retail perspective, I think what Lorna is
18 referring to here is, is there a more, I wouldn't say
19 executive role, but I think is there a role of oversight
20 within the retail business of the Post Office that the
21 Postmaster Non-Execs can play, which I think is quite
22 a complicated concept. You heard Mr Ismail say he did
23 ten days a month anyway. I was trying to wrestle in my
24 own mind what a Postmaster Non-Executive Director, with
25 more role in retail, that then starts to blur, I think,

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1 **A.** Yes.

2 **Q.** -- for postmasters, a summary of the effect of the
3 Common Issues Judgment on the postmaster contract. I'm
4 not going to engage in an exercise of comparing what it
5 said versus the judgment, but instead go straight to the
6 contract itself, POL00000254.

7 Can we look please at page 32. This is, would you
8 agree, one of the key clauses, section 12.

9 **A.** Yes.

10 **Q.** "Responsibility for Post Office Limited Stock and Cash",
11 if we scroll down, please, to 12, "Losses", so
12 section 12.12:

13 "The subpostmaster is responsible for all losses
14 caused through his own negligence, carelessness or
15 error, and also for all losses caused by the negligence,
16 carelessness or error of his or her assistants.
17 Deficiencies due to such losses must be made good
18 without delay."

19 I think you'll recognise that there's a change
20 there --

21 **A.** Yes.

22 **Q.** -- from the past contract, in that it introduces the
23 qualifier negligence, carelessness or error in relation
24 to assistants --

25 **A.** Yes, that's correct.

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1 the boundaries of what an executive does and what
2 a non-executive does. So it is a difficult concept.

3 I think what Lorna is quite rightly pointing out is,
4 certainly where the Post Office is now, there is
5 an opportunity for more input from the broader
6 postmaster community and I buy that completely and I do
7 believe that, which is certainly why we have a serving
8 postmaster as part of the Senior Leadership Team.

9 I think trying to fashion the role, as described
10 here, could be complicated, in terms of
11 accountabilities.

12 **Q.** So we shouldn't read this to mean that Ms Gratton's view
13 as expressed here was that having postmasters on the
14 board was not worth it?

15 **A.** That's certainly not how I read it, no.

16 **Q.** Thank you. I only raise that because it is linked to
17 the question that the Chairman asked.

18 **A.** Right.

19 **Q.** Can we move to the new topic, then, which is the
20 post-Group Litigation postmaster contract.

21 **A.** Yes.

22 **Q.** We have looked at the front page and a bit of it,
23 section 19, already. The crossreference, no need to
24 turn it up, is POL00000254, and I think the Post Office
25 produced a guide, do you remember --

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1 **Q.** -- rather than an absolute liability --

2 **A.** Correct.

3 **Q.** -- for losses caused by assistants.

4 Then clause 13:

5 "Subject to clauses 12 and 13A ... the financial
6 responsibility of the subpostmaster does not cease when
7 he relinquishes his appointment and he will be required
8 to make good any losses incurred during his term of
9 office which may subsequently come to light."

10 Then some new clauses, 13A:

11 "Post Office shall not seek recovery from the
12 subpostmaster unless and until:

13 "[1] it has complied with its duties under clause 20
14 ... (or some of them) ..."

15 We'll look at them in a moment:

16 "[2] it is established that the shortfall represents
17 a genuine loss to it; and

18 "[3] it has carried out a reasonable and fair
19 investigation as to the cause and reason for the alleged
20 shortfall and whether it is properly attributed to the
21 subpostmaster under the terms of this contract.

22 "Gains

23 "Surpluses may be withdrawn provided that any
24 subsequent charge up to the amount withdrawn is made
25 good immediately."

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1 Then if we go to 20, "Post Office Duties":
 2 "Post Office shall:
 3 "[1] provide the Horizon system [which is defined]
 4 which shall be reasonably fit for purpose, including any
 5 or adequate error repellency.
 6 "[2] provide adequate training and support, through
 7 the provision of training materials, to the
 8 subpostmaster, particularly if and when Post Office
 9 imposes new working practices or systems or requires the
 10 provision of new services."
 11 Then 3, I'm going to ask some questions about this
 12 in a moment:
 13 "Properly and accurately effect, record, maintain
 14 and keep records of all transactions effected using
 15 Horizon.
 16 "[4] Properly and accurately produce all relevant
 17 records and/or explain all relevant transactions and/or
 18 any alleged or apparent shortfalls attributed to the
 19 Subpostmaster;
 20 "[5] Cooperate in seeking to identify the possible
 21 or likely causes of any apparent or alleged shortfalls
 22 and/or whether or not there was indeed any shortfall at
 23 all;
 24 "[6] ... identify the causes of any apparent or
 25 alleged shortfalls, in any event;

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1 carelessness or error by a subpostmaster or their staff
 2 approached, in practice?
 3 **A.** In practice? In practice, we do a number of things.
 4 Certainly from an investigative point of view or from
 5 a -- trying to work out whether a discrepancy or a loss
 6 has occurred, we have a completely different approach to
 7 that that we adopted prior to 2019. We have -- as
 8 I mentioned yesterday, we have created a number of
 9 different teams with different responsibilities. That
 10 starts with the network monitoring team, who identify
 11 and look for, and monitor the network on a day-to-day
 12 basis, to identify where there are different issues and
 13 different problems emerging and, indeed, if they are
 14 doing so.
 15 Clearly, we have the Branch Support Team in terms of
 16 the Assurance Team who do the stock and reconciliation
 17 issues, and we have a Support and Reconciliation Team as
 18 well, that is also ring-fenced to help support
 19 postmasters. But I think the most important principle
 20 is that we start from a position of innocence and it is
 21 our objective to help postmasters to understand how, if
 22 and when discrepancies have occurred, how do we work
 23 with them?

24 And we have a tiered process for doing this. The
 25 Branch Support Centre is clearly the first port of call

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1 "[7] disclose possible causes of apparent or alleged
 2 shortfalls (and the cause thereof) to the Subpostmaster
 3 candidly, fully and frankly;
 4 "[8] make reasonable enquiry, undertake reasonable
 5 analysis and even handed investigation, and give fair
 6 consideration to the facts and information available as
 7 to the possible causes of the appearance of alleged or
 8 apparent shortfalls ...
 9 9, I'm going to ask some questions about this too:
 10 "communicate, alternatively, not conceal known
 11 problems, bugs or errors in or generated by Horizon that
 12 might have financial (and other resulting) implications
 13 for the Subpostmaster;
 14 "[10] communicate, alternatively, not conceal the
 15 extent to which other subpostmasters of branches are
 16 experiencing problems relating to Horizon and the
 17 generation of discrepancies and alleged shortfalls;
 18 "[11] not conceal from the Subpostmaster Post
 19 Office's ability to alter remotely data or transactions
 20 upon which the calculation of the branch accounts ...
 21 depend; and
 22 "[12] properly, fully and fairly investigate any
 23 alleged or apparent shortfalls."

24 So with these additional obligations imposed on Post
 25 Office, how is the question of the negligence,

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1 for any postmaster who may or may not have an issue that
 2 might emerge. We have a second line team, which is the
 3 Branch Support and Reconciliation Team, which are there
 4 to aid and support postmasters with more complex issues
 5 and, clearly, we have an IT Team who is and who do go
 6 out to branches very specifically to help postmasters
 7 identify and resolve issues that may or may not be well
 8 understood by those particular postmasters.

9 So it's a very different approach to the one that we
 10 adopted pre-2019.

11 **Q.** In terms of negligence, carelessness or error, for
 12 instance, if a subpostmaster says that the loss arose
 13 because of a lack of training in undertaking this
 14 process, "I admit I pressed these buttons and I admit
 15 that it caused a loss of £500 but that was because the
 16 process I was undertaking, I wasn't properly trained
 17 upon it, and that's what's caused the loss".

18 **A.** Where we --

19 **Q.** Is that negligence, carelessness or error?

20 **A.** I haven't personally been in to do investigations of
 21 that nature but I think that the principle that is
 22 important at this stage is where there is a disagreement
 23 between a branch and the Post Office over a discrepancy
 24 or over an issue, we are not -- other than going into
 25 a dispute resolution process, and a further level of

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1 investigation, and a degree of assurance process -- we
2 are not enforcing that loss on a postmaster.

3 And I think that is an important principle at this
4 stage: we don't think it is appropriate and we are not
5 enforcing it.

6 So it's possibly not answering the specifics of your
7 question but I think the principle that I'm trying to
8 describe is that we start with a presumption of
9 innocence and we also start with the fact that, if we
10 cannot resolve an issue, we are not imposing a solution
11 on a particular branch.

12 **Q.** The evidence from one of the Subpostmaster NEDs was to
13 the effect that the button on the Horizon keyboard, on
14 the branch terminal, for paying in was proximate to the
15 button for paying out --

16 **A.** Yes.

17 **Q.** -- and it was therefore easy to press the wrong button.
18 Is that something that would be classified as postmaster
19 error and, therefore, something for which they were
20 responsible, ie pressing the wrong button?

21 **A.** Again, I am not sure I'm able to describe that
22 specifically but on the principal point you make, we've
23 obviously spent quite a lot of time looking at the
24 keyboard itself so that where there are specific issues,
25 as that you've just described, that are manual issues,

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1 **A.** Yes, I think that's fair.

2 **Q.** At paragraph 20.3 provides that the Post Office will:
3 "properly and accurately effect, record, maintain,
4 and keep records of all transactions effected using
5 Horizon."

6 Does this mean that a mechanism exists for
7 monitoring the identification and payment of any
8 shortfalls by subpostmasters?

9 **A.** Yes, it does.

10 **Q.** So is there a mechanism for recording the payment of
11 shortfalls by subpostmasters?

12 **A.** There is now, yes.

13 **Q.** When was that introduced?

14 **A.** Certainly post-2019. I have had discussions with
15 Melanie Park, who I think you're speaking to next week
16 and, indeed, around this very topic, which is: is there
17 a record of all payments that are made by postmasters,
18 and a reason code and a payment vehicle that it
19 describes what it is that they are paying for, whilst at
20 the same time, is there a problem impact database that
21 describes all the bugs, errors and defects that have
22 emerged, what we've done about them, whether they've
23 been fixed, what potential detriment they may or may not
24 have thrown up and that will be -- that is obviously
25 a database with which the Branch Support Teams and the

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1 we have tried to move buttons and change buttons to make
2 sure that it is more intuitive and easier and less
3 manual, in terms of some of the mistakes that are being
4 made.

5 **Q.** Does the Post Office provide some sort of guidance,
6 either to its investigators or to its subpostmasters, as
7 to what negligence, carelessness or error means, and
8 what it looks like, in practice?

9 **A.** I don't know whether that is specifically the case. We
10 do have, online and e-learning tools around the
11 investigative process, around what we do and why we do
12 it, and examples of where, you know, issues could or may
13 emerge.

14 **Q.** So sort of case studies of --

15 **A.** Yes. That's --

16 **Q.** -- what would and would not fit within this type of
17 subpostmaster liability?

18 **A.** That's my understanding, yes.

19 **Q.** The purpose of asking you those questions, those two
20 examples that I gave, wasn't to get definitive answers
21 for use in the future. Would you agree that it's
22 necessary to have some sort of guidance so that
23 subpostmasters are clear, beyond the three bare words
24 themselves, as to in what circumstances they will be
25 liable for shortfalls and which they may not?

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1 Stock and Reconciliation Teams, who do -- Support and
2 Reconciliation Teams who do engage with postmasters
3 obviously have access to, so that when postmasters
4 describe issues that they may be experiencing, we now
5 have a database of all the issues that have emerged, and
6 that is certainly -- I think it is since 2019, I could
7 be wrong, and all the payments and more importantly the
8 way that reconciliation has occurred in terms of
9 resolving those issues.

10 **Q.** Is that function run and maintained by Fujitsu?

11 **A.** No, that's run and maintained by Melanie Park's
12 Operation Team in Chesterfield.

13 **Q.** Paragraphs 4, 5 and 6, would you agree, taken together,
14 require the Post Office to identify the reason for
15 shortfalls, in particular, 6?

16 **A.** Yes, the onus -- as I have stated, the onus is very much
17 on the Post Office to identify where these problems have
18 occurred, and the onus is very much on the Post Office
19 to ensure that if there are any fixes that need to be
20 made that they make them so, yes, I would agree with
21 that.

22 **Q.** That duty, to identify the cause of a shortfall, exists
23 irrespective of whether the shortfall is settled by the
24 subpostmaster?

25 **A.** That's correct.

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1 **MR BEER:** Thank you.
 2 Sir, it's 12.45 now; could I invite you to break
 3 until 1.45?
 4 **SIR WYN WILLIAMS:** Yes. Certainly.
 5 **MR BEER:** Thank you very much.
 6 **(12.44 pm)**
 7 **(The Short Adjournment)**
 8 **(1.45 pm)**
 9 **MR BEER:** Thank you, sir.
 10 Good afternoon, Mr Read.
 11 **A.** Good afternoon.
 12 **Q.** Can we turn to the topic of shareholder priorities,
 13 please. There is no need to turn it up but, in
 14 paragraph 246 of your first witness statement, you say:
 15 "The postmaster sentiment survey showed that
 16 remuneration is the top priority for postmasters.
 17 Despite some increases, it remained a top priority for
 18 many postmasters and the area with the lowest perceived
 19 improvement."
 20 Can we look at a letter that you reference in the
 21 same witness statement, in your paragraph 169, from
 22 Kevin Hollinrake to Mr Staunton, outlining the
 23 shareholder priorities that the Department would like
 24 you to focus on. UKGI00044317. You will see this is
 25 from Mr Hollinrake to Mr Staunton. It's dated 29 June
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1 Office, a state-owned business?
 2 **A.** I think it's one of a number of priorities. I think the
 3 major priority, as you'll probably see from the 23/24
 4 letter to Henry is very much around compensation and
 5 support to the Inquiry. They are clearly priorities,
 6 but your point is correct in that the last four
 7 postmaster surveys we have conducted, remuneration has
 8 been, on each occasion, been the number 1 concern for
 9 current serving postmasters.
 10 **Q.** If we go to page 2 of the letter and look at the first
 11 priority:
 12 "Effective financial management and performance,
 13 including management of legal costs, to ensure medium
 14 term viability."
 15 If you see at the fourth bullet point, this includes
 16 maintaining "stringent cost control" and maintaining
 17 a "clear focus on value for money and efficient
 18 delivery, across the cost base, including", and then
 19 some subpoints.
 20 Would you agree that effective financial management
 21 and performance, including stringent cost control, is in
 22 conflict with the fair remuneration of postmasters?
 23 **A.** Potentially.
 24 **Q.** So not only is the fair remuneration of subpostmasters
 25 not listed as a priority, a priority that is listed is
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1 2023 and contains the strategic priorities for 2023 to
 2 2024.
 3 I suspect you're familiar with this letter, are you?
 4 **A.** Yes, I am.
 5 **Q.** I don't want to spend time scrolling through it, but
 6 would you agree that postmaster remuneration,
 7 ie ensuring that today's postmasters are able to make
 8 a living, and the viability of the network as
 9 a consequence, are not included in the list of
 10 properties set out by the Government?
 11 **A.** Yes.
 12 **Q.** Do you know why?
 13 **A.** I assume it's because they take that as given, as that
 14 being the core element of the job.
 15 **Q.** You've said that remuneration is, according to the
 16 postmaster sentiment survey, the top priority for
 17 postmasters. It's not listed as any priority by the
 18 Government.
 19 **A.** That's correct.
 20 **Q.** Aside from what is formally written down by the
 21 Government, in your interactions with the Department,
 22 with UKGI and with ministers, would you say it is
 23 a priority for the Government to ensure that
 24 subpostmasters are remunerated fairly and are able to
 25 make a living through their partnership with the Post
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1 potentially in conflict with it?
 2 **A.** Yes, I think that's fair to say.
 3 **Q.** You tell us in your witness statement, paragraph 273 --
 4 no need to turn it up -- that you have:
 5 "... committed that Post Office will work towards
 6 sharing 50 per cent of branch generated revenue with
 7 postmasters which represents a significant change to
 8 their remuneration and, in the last financial year, the
 9 Post Office achieved 45.6 per cent, and would continue
 10 to drive the fixed upwards."
 11 Would you agree that if branch generated income is
 12 low, then the amount available to be shared with
 13 subpostmasters is low?
 14 **A.** That's one part of the equation. The other part of the
 15 equation is the central costs associated with running
 16 the Post Office which, obviously, if we reduced those
 17 central costs then the proportion of revenue that's
 18 available to be distributed increases.
 19 **Q.** Would you agree that the Government and Post Office is
 20 not doing enough to ensure that branches can offer
 21 sufficient services to ensure sufficient
 22 branch-generated income?
 23 **A.** I think we're trying hard to do that but that comes to
 24 the core of the purpose of the Post Office, which, you
 25 know, ultimately -- and we've discussed this over the
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1 last couple of weeks in this forum -- is getting clear
 2 on what the purpose, the vision and the strategy of the
 3 Post Office is: is it about generating new sources of
 4 income and, indeed, what are those new sources of
 5 income; is it about market failure and, from
 6 a Government perspective, being clear what market
 7 failure the Post Office is there to address; or is it
 8 about looking for new avenues?

9 And that's very much what we have tried to do, which
 10 I said in my personal statement quite extensively, about
 11 the plans that we've had to drive the four key
 12 activities that the Post Office is engaged in, mails and
 13 parcels, cash and banking, what we're doing with our
 14 travel business and how we're driving our platform
 15 products as well, which is where we're looking for new
 16 commercial opportunities for postmasters to --
 17 ultimately to drive their revenue.

18 **Q.** A member survey by the National Federation found that
 19 70 per cent of postmasters who responded to the survey
 20 were taking home personal drawings of less than the
 21 national minimum wage, at that time £8.91 an hour.
 22 Would you agree that it is shocking that the Post Office
 23 and their sole shareholder, the Government, would allow
 24 the remuneration of postmasters to fall to such a low
 25 level and then not make it a priority to rectify it?

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1 dated 16 April 2018. Have they been updated since then?

2 **A.** Not as far as I'm aware.

3 **Q.** Can you tell us what the entrustment requirements are,
 4 please -- I mean, not a list of what they are but,
 5 generically, what do you understand the entrustment
 6 requirements to be?

7 **A.** This is the services of general economic interest in
 8 terms of what it is that we are expected to provide by
 9 way of running the Post Office.

10 **Q.** If we scroll down, please, and keep going. The last
 11 sentence on the top of the previous page:

12 "That network must meet the following minimum access
 13 requirements ..."

14 **A.** That's correct, yes, the SGEIs, yes.

15 **Q.** The first:

16 "Nationally, 99% of the UK population to be within
 17 3 miles and 90% of the population to be within 1 mile of
 18 their nearest post office outlet.

19 "[Secondly] 99% of the total population in deprived
 20 urban area across the UK to be within 1 mile of their
 21 nearest post office outlet.

22 "95% of the total urban population across the UK to
 23 be within 1 mile of their nearest post office outlet.

24 "[Fourthly] 95% of the total rural population across
 25 the UK to be within 3 miles of their nearest post office

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1 **A.** It hasn't appeared, as you say, in the shareholder's
 2 letter to the Chairman. However, it's a clear priority
 3 for the organisation. I think we spend a great deal of
 4 time focused on how do we generate more revenue for the
 5 existing postmaster population. By way of example,
 6 I think in the first year, in 1920 (*sic*), we increased
 7 postmaster remuneration by 10 per cent. The following
 8 year by 7 per cent, and the subsequent two years, we've
 9 obviously not been as successful as we were in those
 10 first two years, it's tended to be inflation led.

11 What we've done, particularly with the mails and
 12 parcels element of the revenue that is generated by
 13 postmasters, is to link that to CPI, so that at least it
 14 increases every single year by the same -- well, by CPI
 15 so some 65 per cent of all the mails and parcels
 16 products that we sell.

17 But your point is well made, which is there is more
 18 to do to take cost out of the business and there is more
 19 to do to address the underlying operating model that
 20 allows postmasters to simplify their relationship with
 21 Post Office and obviously simplify what it is they are
 22 doing.

23 **Q.** Can we look at the entrustment requirements set by
 24 Government. POL00027887. You'll see that these are
 25 contained in a letter addressed to your predecessor,

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1 outlet."

2 Then:

3 "In addition, the following criterion will apply at
 4 the level of each and every individual postcode district
 5 ...

6 "95% of the population of the postcode district to
 7 be within 6 miles of their nearest post office outlet."

8 Then:

9 "Post Office is required to provide this network of
 10 post office branches to make available the services of
 11 general economic interest detailed in annex A ..."

12 Do you agree that these are requirements are those
 13 that currently exist in relation to the post office?

14 **A.** Yes, they do.

15 **Q.** Do you agree they impose upon the Post Office
 16 an obligation to public service?

17 **A.** Yes, they do.

18 **Q.** But do you agree they impose an obligation on Post
 19 Office to public service that impacts upon the
 20 profitability of Post Office as a business?

21 **A.** Undoubtedly.

22 **Q.** Would you agree that the public service requirements, as
 23 I'm going to call them, tend to fall more heavily on
 24 smaller branches with a lower footfall in areas of lower
 25 population density --

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1 A. Largely, yes, that's fair.
 2 Q. -- or lower income areas, which mean that branches in
 3 such areas are less profitable than branches typically
 4 are in wealthy urban districts?
 5 A. I think that's fair.
 6 Q. Can you also confirm the branches that bear the greater
 7 weight of these public service obligations tend not to
 8 be those run by what I think are called strategic
 9 partners, ie Co-op, WHSmiths and similar?
 10 A. That's correct.
 11 Q. Does the Post Office have an enduring commitment from
 12 Government to maintain public service duties of the Post
 13 Office into perpetuity?
 14 A. I don't think we've had a long commitment to do that.
 15 The expectation is that we will fulfil the SGEIs and, on
 16 a yearly basis, that's exactly what these are. The
 17 policy, or the entrustment, as set out hasn't changed
 18 since 2010 and we are, and have been, in discussion
 19 since 2021 with the Government around a policy review
 20 for the Post Office, and that is not something that has
 21 yet come to fruition but it is something that we have
 22 been very keen to encourage the shareholder to take part
 23 in or, in fact, to lead.
 24 The point being is that the market has changed
 25 dramatically since 2010. I mean, not least we've had

1 that -- this particular letter that we've just read
 2 implies.
 3 Q. Can you assist us: in practice, how do branches in low
 4 population density or deprived areas, as compared to
 5 branches in higher population density or wealthier
 6 areas, receive, if they do, appropriately weighted
 7 compensation for delivery of the public service
 8 requirements?
 9 A. Yes, I can. So we receive a subsidy from the Government
 10 for the provision of services in areas where, to your
 11 point, it may not be economically possible to run
 12 a branch. We have some 1,300 SPSO branches, which are
 13 traditional legacy branches, which tend to operate, as
 14 you quite rightly point out, in rural, or isolated, or
 15 inner urban areas, that may not have the level of
 16 economic activity that -- or footfall indeed, that you
 17 would expect.
 18 That subsidy, to the tune of £50 million, has been
 19 static since 2018, in terms of its funding. I think it
 20 was 210 million a year, back in 2012/2013, at the time
 21 of separation. It is, as I say, and has been, static
 22 for the last six years at 50 million but, to my earlier
 23 observation, the changing shape of the landscape and the
 24 changing shape of footfall on the high street has meant
 25 that, in essence, costs have increased while the subsidy

1 separation of Royal Mail from the Post Office, we've had
 2 the right of digitisation, we've had the growth in
 3 e-commerce and we've had a massive change in consumer
 4 behaviours and habits and there is a reason why the high
 5 street is closing at the speed with which it is closing,
 6 there is a reason why 5,000 banks have closed since
 7 2015. The face-to-face delivery of services has
 8 changed, which therefore makes the question around --
 9 the question that needs to be answered -- very, very
 10 clear as to the long-term purpose and vision of the Post
 11 Office and, by that, I mean long-term.
 12 We describe here in the -- or in the letter that
 13 you've just shown us the strategic priorities for the
 14 Post Office. My personal view is strategic priorities
 15 aren't for a year; strategic priorities imply five to
 16 ten years, at least in terms of vision. So they're
 17 tactical priorities, as opposed to strategic priorities.
 18 What the Post Office is in need of, and certainly
 19 the work that the incoming Chair has initiated with
 20 Teneo from its strategic -- in its strategic review, is
 21 a joined-up vision between the Post Office and the
 22 shareholder for the long-term future of the Post Office,
 23 and by that I mean five to ten years minimum, such that
 24 we can start to plan more strategically, as opposed to
 25 tactically, which is very much the nature of the letters

1 has remained static but, in real terms, lost value. So
 2 there is a mismatch between those two.
 3 Q. Is the subsidy distributed to post offices by reference
 4 to the extent to which the public service requirements
 5 are disproportionately borne by them, ie --
 6 A. Yes, I understand. Yes. It tends to be footfall/
 7 transaction driven, in terms of how we support -- with
 8 fixed payments to specific branches.
 9 Q. I think it's right that in the summer of this year,
 10 Grant Thornton delivered an important report for the
 11 Post Office?
 12 A. One of many, yes.
 13 Q. Yes. Let's look at the report to make sure we're --
 14 A. I was going to say --
 15 Q. -- looking at the same one. POL00446476. This one
 16 concerned the effectiveness of the Board.
 17 A. Yes.
 18 Q. It's dated 19 June 2024. Can you explain, please,
 19 firstly, the circumstances in which Grant Thornton came
 20 to be commissioned to undertake this review and write
 21 this report?
 22 A. Yes, I can. I think Rachel Scarrabelotti mentioned this
 23 last week. In effect, the sort of business code
 24 suggests that you should have a Board Effectiveness
 25 Review on a yearly basis and I think every three years

1 the effectiveness review should be done and conducted by
 2 an external party, and Grant Thornton were commissioned
 3 to do the external review.

4 **Q.** Thank you. If we go over the page, you'll see the
 5 partner at Grant Thornton delivering the report. If we
 6 scroll forwards, please, an idea of the length of the
 7 thing. Then forwards, please. If we can perhaps skip
 8 to page 8, I think this is the first part of substance
 9 to the report that we will find. It's an executive
 10 summary or key findings section. Under "Overview", the
 11 first key finding was:

12 "Lack of clarity on the purpose of the Board, with
 13 the Shareholder relationship inhibiting the Board's
 14 effectiveness due to perceived interference in [Post
 15 Office's] work and limited visibility around the
 16 longer-term funding and objectives of the organisation."

17 Was that a finding with which you agreed?

18 **A.** Yes, it was, and I would say that the findings did get
 19 Board endorsement.

20 **Q.** There's three parts to it. Firstly, a lack of clarity
 21 on the purpose of the Board; what does that mean?

22 **A.** I think perhaps the way I would describe it is that,
 23 given that there is ambiguity over the strategy, purpose
 24 and vision of the Post Office, it is quite difficult to
 25 ensure that the level of governance that is supporting

1 made around the control of the shareholder without
 2 consequence or without accountability and the general
 3 influence that the shareholder has over the direction of
 4 the business.

5 You'll also notice, certainly in my first witness
 6 statement, I made reference to some of the Non-Executive
 7 Directors who'd left after a single term, feeling that
 8 independence has and was eroded, if that's the right
 9 word, by the -- well, by the obligations and by the
 10 constraints that are part of being a publicly-owned
 11 organisation.

12 **Q.** The third element is limited visibility around the
 13 longer term funding and objectives of the organisation;
 14 was this essentially recording that the Post Office
 15 needed to know whether it had the backing of its owner
 16 long term?

17 **A.** Yes.

18 **Q.** Why did it take the expense of an outside organisation
 19 to report to be able to state the fairly obvious truth
 20 that the Post Office needs to know whether it has the
 21 backing of its owner long term?

22 **A.** I think, as Alisdair Cameron said a couple of weeks ago,
 23 this has been a constant struggle for members of the
 24 Board. This isn't something that has sort of emerged
 25 relatively in the near term. When it comes to funding,

1 that misaligned strategy, if that's the right word, is
 2 quite difficult to articulate. And I think what the
 3 Board have struggled with in terms of governance
 4 challenges is, without real clarity about the purpose
 5 and direction of the Post Office long term it's quite
 6 difficult to establish the right levels of governance,
 7 and I think that's the clarity issue that's being
 8 described here, and the reference being made to what the
 9 Board has wrestled with.

10 **Q.** The shareholder relationship inhibiting the Board's
 11 effectiveness due to perceived interference; in what way
 12 did the Government inhibit your Board's effectiveness by
 13 interfering in your work?

14 **A.** I think it's more the lack of clarity over matters that
 15 are for the Board and matters that are for the
 16 shareholder. There are certain areas in which the
 17 shareholder has and takes a particular standpoint and
 18 view. I think it would be obvious to point out that we
 19 have a single source of funding, which is the
 20 Government, and we are therefore completely and utterly
 21 reliant on our funding from the Government, and this, by
 22 definition, causes challenges, certainly from
 23 a strategic point of view.

24 You will have seen in the verbatims associated with
 25 this particular report that there are many observations

1 in particular, that is a challenge for the business.
 2 I think we are subject to spending reviews, Government
 3 spending reviews, which could be one, two or even three
 4 years in duration. There are many issues associated
 5 with determining how funding is derived. I will use
 6 a similar analogy or similar example to the one that AI
 7 used, which was the 21/22 funding round, where the Post
 8 Office identified a need for £450 million, which was
 9 a combination of subsidy and investment, and we were
 10 offered 202 million and, eventually, after five months
 11 of toing and froing, the Government gave us 335 million,
 12 which was still obviously 80 million less than had been
 13 asked for.

14 That has happened at each of the funding rounds that
 15 the business have had and that obviously makes the idea
 16 of long-term planning very difficult. Funding is
 17 obviously driven by budget, rather than by need, and
 18 I think, again, a long-term strategy, with an underlying
 19 funding model to support that, is what I think is
 20 required and, clearly, that's one of the outputs, I'm
 21 sure, that Teneo will be discussing with the Government
 22 over the next two or three weeks when the final Teneo
 23 review is put forward.

24 **Q.** I'm going to come to Teneo in a moment.

25 **A.** Right.

1 **Q.** Would you agree that the confirmation of the
2 Government's commitment to Post Office's public service
3 and the number and spread of branches must be a basic
4 requirement for the continuation of the Post Office as
5 an institution?

6 **A.** My sense is that the policy review that is required by
7 the Government, 15 years since its last policy review,
8 should look at all elements of the public sector service
9 that is provided by the Post Office, and be very clear
10 on what it is that it is expecting the Post Office to
11 deliver.

12 Clearly, at present, we have a fairly uncodified
13 social contract. Yes, you described the service of
14 general economic interest and the entrustment elements
15 of it, but I think it's broader than that and it's wider
16 than that. When you look at the role that postmasters
17 play in communities up and down the country, when you
18 look at the trust at a local level between consumers and
19 customers, the communities and their postmasters, it is
20 quite extraordinary.

21 And when you look at the social value associated
22 with that commitment from postmasters, it is that that
23 I think needs to be more heavily examined in terms of
24 the contribution that is being made by postmasters and
25 how the Government sees, over the next 5, 10, 15 years,

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1 up -- that the issues that you identified with the
2 culture within the Post Office included, from the
3 outset, a perception that "the organisation had lost
4 sight of the postmasters".

5 Is the failure by the Government to ensure the
6 future of the Post Office and a commitment to its social
7 purpose and consequential funding another example of
8 such a cultural behaviour?

9 **A.** Yes, I think that's fair.

10 **Q.** Would you accept that the very same issues of obtaining
11 decisions and support from Government have also affected
12 and afflicted the compensation, redress and financial
13 restitution?

14 **A.** No, I don't think that's fair to say that. My sense is,
15 and I think from a DBT perspective, not unsurprisingly,
16 a great deal of focus has been on redress, certainly in
17 the five years that I've been in the organisation, and
18 perhaps less time has been spent on developing the Post
19 Office of today for tomorrow. And I think that the
20 Government would -- and officials in DBT, would
21 recognise that that is the case. It is complicated to
22 manage both but I think it is important, certainly for
23 today's Post Office, that there is more clarity.

24 **Q.** You tell us in your first witness statement -- no need
25 to turn it up, it's page 22, paragraph 38 -- that:

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1 that continuing to evolve but, more importantly, that
2 postmasters are recognised for that contribution, which
3 they currently aren't.

4 **Q.** How is it possible that these questions -- the long-term
5 backing of the owner, the continuation of the social
6 purpose commitment -- have not been answered for the
7 future?

8 **A.** I think that's a question you'll need to discuss with
9 the Government. As I say, we've been keen to have
10 a policy review for some time. We make this desire very
11 clear to Government: that this is what we are expecting
12 and what we need because there is, as I said,
13 a determination to have a unified purpose, a unified
14 vision and a long-term strategy from the Post Office,
15 from which everything else should flow.

16 **Q.** Do you agree that, in the meantime, the continuation of
17 the Post Office, coupled with the support of Government,
18 goes hand in hand with the projected life of Post Office
19 branches and, consequentially, the individual
20 investment, mortgages and family financial decision
21 making that has to be undertaken by postmasters on
22 a daily basis?

23 **A.** Yes, I do.

24 **Q.** You tell us in your third witness statement -- it's
25 paragraphs 31 to 46, but there's no need to turn them

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1 "The external strategic review that the Post Office
2 is undertaking led by Teneo will be complementary to the
3 work being undertaken by the Department, as it intends
4 to set out a future model for the Post Office to deliver
5 sustainably against the stakeholder requirements."

6 You add that that review was expected to conclude in
7 September 2024, the month just gone. What's the current
8 position?

9 **A.** The current position: two years ago, the Department
10 invited, as it happens, Grant Thornton, again, to do
11 an initial strategic review of the Post Office, and
12 I think that that was primarily associated with the sort
13 of commercial long-term future of the Post Office.

14 The output of that piece of work was a second
15 review, which I understand is what is ongoing at the
16 moment, again, commissioned by DBT. I've not had sight
17 or visibility of the scope or of the content of that
18 review, or indeed of its findings, and, clearly, from my
19 perspective, it's quite important that we are included
20 in that piece of work.

21 I hope that, and am reassured, certainly by the
22 current Chair, that he has had those conversations with
23 the incoming administration, whereby we can dovetail the
24 Teneo Strategic Review and the independent work
25 conducted by the Department to ensure that the output is

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1 something consistent and something that everybody can
 2 buy into.
 3 **Q.** Can we look at the scope of the review, POL00448624.
 4 Can we look at page 109, please. This was a Board paper
 5 and an update for the Board on the Strategic Review.
 6 It's dated 4 June 2024. If we can go to the next page,
 7 110, please, we see the scope of the review but, by way
 8 of background first:
 9 "Post Office has invited Teneo to carry out
 10 a comprehensive Strategic Review of the business and
 11 develop a clear plan for the future."
 12 Then the equivalent passage on the right-hand side:
 13 "Teneo will undertake a through review of the Post
 14 Office to understand its current position, clarify its
 15 core objectives, identify opportunities and risks,
 16 prioritise initiatives and develop a clear [path] to
 17 realise the chosen strategy."
 18 Then a plan. Then if we go over the page:
 19 "We aim to address a range of key questions for the
 20 Post Office to develop a clear plan for the business
 21 over the next five years."
 22 One of them on the far right is "Stakeholder
 23 Management":
 24 "How do we ensure stakeholder support for the
 25 strategy?"

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1 businesses, with large logistics players, with other
 2 retailers, or is it there to fulfil a particular social
 3 purpose for the isolated, for the elderly, for
 4 Government services, in terms of providing some form of
 5 Government service around benefits and the like?
 6 I think it's a pretty fundamental question that the
 7 Government needs to ask and, with that and from that,
 8 flow many of the issues that are on this single slide.
 9 My recollection was that this is Teneo's first
 10 engagement with the Board and this was their sort of
 11 first initial starter for ten. Things have evolved
 12 since then from a scope perspective, in terms of how
 13 they go about doing that piece of work and ...
 14 **Q.** Why has it taken five years since the judgments of the
 15 High Court for the Post Office to consider these most
 16 basic of propositions, given the scrutiny given over to
 17 the Post Office in those judgments?
 18 **A.** I don't think that's necessarily how I would
 19 characterise it. We conducted, when I first started at
 20 the Post Office -- which I say from my evidence -- a not
 21 dissimilar review to this particular one with McKinsey
 22 which looked at the purpose and looked at the strategy
 23 and looked at the vision of the Post Office.
 24 Clearly, in the following five years an enormous
 25 amount has changed, not just consumer behaviour as

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1 "How do we ensure that subpostmasters' interests are
 2 properly reflected?
 3 "Is the current ownership structure appropriate?
 4 "What is the most appropriate funding model?"
 5 Left-hand side, "Reputation, Trust & Brand":
 6 "How is the Post Office viewed in the wake of the
 7 Horizon scandal?
 8 "What actions must be taken to restore public
 9 confidence?
 10 "What do stakeholders want to see from the Post
 11 Office (eg make money vs serve the community)?
 12 "Does the Post Office's purpose and vision need to
 13 evolve to balance societal vs economic benefits?"
 14 Some of these questions are, would you agree, rather
 15 fundamental but also rather basic, ie "What do
 16 stakeholders want to see from the Post Office (ie make
 17 money vs serve the community?" How is it that question
 18 needs to be asked and answered now?
 19 **A.** Well, I think the long-term purpose of the Post Office
 20 is pretty critical. I think we've got to understand and
 21 ask ourselves what is the purpose of the Post Office,
 22 what is it for, and, alongside that, will go questions
 23 of ownership, in terms of where does it sit? So is it
 24 designed as a commercial entity that is competing in
 25 markets with the banks, with financial services

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1 a consequence of Covid, not just some of the issues
 2 associated with the cost of living crisis, but also the
 3 revelations of some of the practices that we have been
 4 uncovering in the Inquiry, and so I think strategy is
 5 always dynamic, there are always things occurring.
 6 I think, probably, the last five years in the Post
 7 Office's history have been more dynamic than any other
 8 time in recent memory, and I think that's something that
 9 needs to be build into the particular strategic review
 10 that has been triggered by the arrival of the new Chair.
 11 I think it also needs to be brought -- there is
 12 a natural time frame for this exercise. First and
 13 foremost, the Inquiry will come up with its set of
 14 recommendations, following the four years that it's been
 15 engaged looking at what is gong on in Post Office; there
 16 is a new administration, in terms of the Labour
 17 Government, and therefore there will be a shift and
 18 change in its perspective on what the future of the Post
 19 Office may look like; and, at the same time, we are
 20 producing our own internal strategic review.
 21 And I think, bringing together all of these
 22 elements, it's a very natural time for the organisation
 23 to take stock and to, I hope, find real clarity about
 24 the purpose, the vision and the long-term strategy for
 25 the Post Office.

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1 **Q.** In the meantime, how can subpostmasters and their small
2 to medium businesses possibly make plans when the Post
3 Office itself and the Government are asking such
4 fundamental questions as these, looking around for ideas
5 and answers?

6 **A.** I think it's a very reasonable question in the sense
7 that this will have been an extremely difficult time for
8 postmasters and -- and for post offices more broadly,
9 not just because of the changing shape of the macro
10 conditions in which they operate, which you've just
11 described, but also as a consequence of the fact that we
12 need to get much, much clearer on what the long-term
13 future looks like.

14 When I go into branches, and have done over the last
15 six to eight months, the questions that postmasters put
16 to me most explicitly are around: what are we doing for
17 remuneration; what are we doing by way of innovation, in
18 terms of what other products and services can we sell
19 and can we deliver from our post offices; but then the
20 sort of third and fourth questions are what is happening
21 to the brand as a consequence of this scandal; and, more
22 importantly, what is happening to my long-term
23 investment in a post office?

24 I'd say they were the four top questions that are
25 asked of me when I go into post offices today.

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1 **Q.** Only 35 per cent of them reported that they had
2 confidence in their senior leadership in the 2024 Post
3 Office Colleague Engagement Survey, and you tell us that
4 that has fallen 5 per cent since the 2023 survey and
5 4 per cent since the 2022 survey. That's in
6 paragraph 252 of your first witness statement.

7 Are postmasters included in the Colleague Engagement
8 Survey?

9 **A.** We do a dedicated survey for postmasters, which is
10 a postmaster survey, and we do an internal survey for
11 those people who are --

12 **Q.** So the survey that I'm talking about, the Colleague
13 Engagement Survey, that's for Post Office employees?

14 **A.** That's for the employees, correct.

15 **Q.** Given the initiatives that you've told us about
16 throughout your four witness statements, why is it that
17 the confidence in senior leadership within the Post
18 Office is falling?

19 **A.** I think there are a number of reasons for that. I don't
20 think it'll come as a great surprise that the survey
21 itself was conducted, I think, in February and March, at
22 the time of Henry's departure from the business, and the
23 enormous focus that was provided by that, in terms of
24 the perceived dysfunctional nature, I guess, of the
25 Board and, to a degree, of the Group Executive, and

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1 I hope that we can answer those in the next few
2 weeks, as we go through the Strategic Review. I think
3 that is going to be a really very important part of
4 providing confidence to postmasters about the long-term
5 direction of the business. Will we answer all the
6 questions? I doubt it. But I think we will be able to
7 give people much greater clarity on what the next five
8 to ten years look like and I hope that, from
9 a governmental point of view, we can look at the funding
10 model to make sure that it is reflective of a five to
11 ten-year strategy rather than a one to two-year tactical
12 engagement.

13 **Q.** Put bluntly, who would buy a post office under these
14 conditions?

15 **A.** Strangely, now you say it, we don't see the level of
16 churn that you would expect. Had you asked that
17 question to both Saf and Elliot two weeks ago, you would
18 have found that they are both looking for additional
19 post offices. There is and there are a number of
20 individuals who are keen to buy post offices. So
21 I think -- you know, I don't think it's quite as stark
22 as you are perhaps suggesting. As I say, there are
23 entrepreneurial postmasters who are still keen to run
24 a post office and, you know, I think people should take
25 confidence in that.

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1 I think that has had a profound impact on colleagues and
2 senior team members.

3 It obviously occurred after the four-part
4 dramatisation, literally a few weeks after that and, of
5 course, the subsequent and quite rightly media outrage
6 and consumer outrage at what had happened historically
7 within the Post Office. And I think these are important
8 elements to factor into the sentiment of colleagues,
9 whose pride, clearly, has been, not unsurprisingly,
10 hugely damaged and whose confidence, having seen a level
11 of dysfunction as perceived in the media, rather than it
12 being conveyed to colleagues through normal internal
13 channels, was obviously being seen in the media. And
14 I think that put a big dent in the confidence that
15 colleagues had in senior leadership.

16 **Q.** Would you agree that the fall in confidence in the
17 Senior Leadership Team could, in part, be due to the
18 high turnover of senior leadership, perhaps giving the
19 impression of a rudderless ship?

20 **A.** In part, I think high turnover has been a feature of the
21 Post Office for many, many years. It's a difficult
22 place to work, it's a difficult place to achieve success
23 and I think, at the moment, it's probably at its most
24 difficult, given the overarching implication of the
25 scandal, as well. So, yes, I think that's certainly

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1 something that is a major factor, is -- and, as
 2 I mentioned before the lunch break, the importance of
 3 stability at a Board and Group Executive level and the
 4 importance of stability and confidence in the
 5 individuals who are occupying those roles, is paramount
 6 to the long-term success of the business, and that's
 7 something that I think is needed and needed urgently.

8 **Q.** Do you think it could, in part, be due to the revelation
 9 of a scandal, upon a scandal, being the awarding of
 10 bonuses to senior Post Office leadership in relation, in
 11 particular, to an Inquiry-based metric?

12 **A.** I think the challenges in the business certainly stem
 13 back to that particular period. There's no question
 14 that the Transformation Incentive Scheme and the bonus
 15 metric associated with it, and the perception that the
 16 organisation was blind or deaf to what was occurring
 17 within the scandal, certainly will have dented people's
 18 confidence for sure.

19 **Q.** Would you agree that the dent or diminution in senior
 20 leadership's confidence could, in part, be due to the
 21 allegations of bullying and sexism made against
 22 individuals in senior leadership positions, including,
 23 in fact, yourself and Mr Staunton?

24 **A.** Yes, I guess that's probably fair, that that image that
 25 will have been conveyed by those allegations will, of

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1 last four years, that is materially different from where
 2 the Post Office has been historically, notwithstanding
 3 the perhaps heavy-handed way in which Elliot had been
 4 treated.

5 **Q.** In the light of these issues, and each of them, what
 6 confidence should the Inquiry have that the Post Office
 7 has or will put in place a Senior Leadership Team that
 8 deserves the confidence of Post Office employees,
 9 postmasters and the public?

10 **A.** I think the energy and enthusiasm and drive of the new
 11 Chair should give the Inquiry great confidence that
 12 Nigel will ensure that: (a) the Strategic Review is
 13 conducted in the right way; (b) that the Board and its
 14 colleagues will be aligned behind that Strategic Review
 15 and that subsequently we will have a Strategic Executive
 16 Group and Senior Leadership Team that will support what
 17 we're trying to do.

18 So I feel confident that that will happen. I think
 19 we have a number of capable -- and very capable
 20 executives who have joined the business reasonably
 21 recently, and I think the Board, as well, is -- and
 22 I mentioned it before sort of six months ago -- the need
 23 for sort of stabilisation. I think Nigel has brought
 24 that to the organisation and to the Board. So, yes,
 25 I do have confidence that the wheels are in motion to

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1 course, have had an impact on colleagues. However, in
 2 defence of that, I would say that a degree of confidence
 3 will have been taken by colleagues that no one is above
 4 the law in the Post Office, and those whistleblowing
 5 allegations that were made against me, as an example,
 6 were followed through with a fairly comprehensive
 7 investigation. None of the allegations, I may hasten to
 8 at, were upheld but, by definition, colleagues will have
 9 taken confidence that it was possible to investigate the
 10 Chief Executive and the Chairman, irrespective of what
 11 else was going on in the organisation and, more
 12 importantly, that those investigations went through to
 13 their natural conclusions.

14 **Q.** Would you agree that the diminution in the confidence in
 15 the senior leadership of the organisation could, in
 16 part, be due to postmasters, including Elliot Jacobs,
 17 a Board member, facing a harsh and non-transparent
 18 investigation, suggesting to subpostmasters that perhaps
 19 nothing has changed since the GLO?

20 **A.** I don't think that particular isolated incident of
 21 Elliot, disappointing though it was -- and as I said
 22 yesterday, I don't think it was conducted in the way
 23 that I certainly would have wanted, I think. But I also
 24 do believe that when you look in the round at the way
 25 that we have changed to support postmasters over the

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1 ensure that the business can come through this very,
 2 very difficult period and, you know, emerge stronger.

3 **Q.** In your first witness statement at paragraph 214 --
 4 perhaps we'd better have it up on the screen,
 5 WITN00760100, page 105, please. Paragraph 214, you tell
 6 us that:

7 "In April 2021, Post Office launched a behavioural
 8 framework called 'Ways of Working' ('WOW') to replace
 9 the Post Office's previous values and strategic pillars
 10 of: Care, Challenge and Commit. [Ways of Working] was
 11 intended to describe 'how' an individual should act in
 12 Post Office, to define behaviours that were expected of
 13 all Post Office personnel when interacting internally
 14 and externally with both Post Office colleagues and with
 15 postmasters."

16 You tell us in paragraph 220 on page 107:

17 "The Colleague Engagement Survey ... asks colleagues
 18 'whether they see the Ways of Working demonstrated
 19 across the business'. In 2021 this was 41%, in 2022,
 20 50%, in 2023, 58%, in 2024, 53%. Colleagues were also
 21 asked to indicate their agreement to the following
 22 statement: 'Where I work people are held accountable for
 23 their performance and behaviours'."

24 In 2022, 38 per cent agreed; '23, 59 per cent; and
 25 in '24, 63 per cent.

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1 Are postmasters included in this survey?
 2 **A.** No, not in this survey.
 3 **Q.** As they're not included, how can the Post Office measure
 4 whether the Ways of Working are being demonstrated in
 5 interactions with subpostmasters?
 6 **A.** We have a separate postmaster survey, which gives the
 7 opportunity for all postmasters to take part. That
 8 happens at a very similar time, and we also then do
 9 a pulse survey every six months with postmasters, just
 10 to check on whether or not we are making progress on the
 11 commitments that we made following that survey.
 12 I think it's quite important just to touch on the
 13 postmaster survey. It is conducted usually in February
 14 and March with results in April, and that tends to
 15 provide me with the opportunity to speak to the
 16 postmasters at our annual postmaster conference, where
 17 we will share the results of the survey itself. We will
 18 post those results on to Branch Hub and by email to all
 19 postmasters, and we'll then have a series of workshops
 20 which postmasters are invited to, and they can take part
 21 in if they want to, which allows us to work through the
 22 results themselves, so that postmasters can bring to
 23 life for the team what it is that is being said, and
 24 interpret the surveys themselves, so that we can then
 25 build an action plan.

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1 that.
 2 **SIR WYN WILLIAMS:** Right, so I've got that right.
 3 **A.** Yeah.
 4 **SIR WYN WILLIAMS:** That has either gone, or is imminently
 5 going to, Government for their, in inverted commas,
 6 "approval".
 7 **A.** That's correct.
 8 **SIR WYN WILLIAMS:** But am I also right in thinking that at
 9 the same time, the Government has been working on their
 10 own strategic --
 11 **A.** That is correct.
 12 **SIR WYN WILLIAMS:** Has there been any crossover between
 13 those two keys of work?
 14 **A.** There has been interaction between the Teneo team and
 15 DBT, as I understand it.
 16 **SIR WYN WILLIAMS:** Right. I did get it right at least.
 17 **MR BEER:** Can you tell us what "interaction" means?
 18 **A.** That's a good question. The -- as I understand it,
 19 Teneo have obviously got a number and a range-off
 20 stakeholders that they've engaged with and clearly DBT
 21 is one of those, and my understanding is that Teneo and
 22 DBT have discussed the specific piece of work, the
 23 specific policy work that DBT Phase 2 have initiated,
 24 and we obviously want to make sure that these pieces of
 25 work come together.

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1 And then, towards the middle of the autumn, and
 2 it'll be sometime this month, I think -- yes, it'll be
 3 sometime this month or maybe early in November -- we
 4 will have a pre-Christmas conference where we will
 5 present the results of the pulse survey but also the
 6 action plans associated with the survey that was
 7 conducting in March, and people can hold us to account
 8 for whether or not they've seen any improvement or any
 9 change in, or indeed whether or not the commitments that
 10 we've made and the action plans that we've promised,
 11 we've actually made any progress at all.
 12 So there is a difference between the two surveys,
 13 clearly there are different things to measure, and
 14 different things to gain and get feedback on.
 15 **MR BEER:** Thank you, Mr Read.
 16 Sir, can we take the afternoon break now.
 17 **SIR WYN WILLIAMS:** Yes, we can but can I just clarify one
 18 thing that I want to be sure I've got the right end of
 19 the stick. My understanding of Mr Railton's evidence
 20 was that, as a consequence, at least in part of the
 21 Teneo work, a strategic plan had now been formulated at
 22 Post Office; is that correct?
 23 **A.** The final version of the strategic plan has been
 24 completed by Teneo and the main Board have signed it
 25 off, in the sense that they agree with the findings of

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1 There's absolutely no point in doing a Strategic
 2 Review of the Post Office internally, if the shareholder
 3 is off doing its own piece of work and never the two
 4 should meet. That would be a very unfortunate outcome.
 5 **SIR WYN WILLIAMS:** I love the way we use the word "The
 6 Inquiry" but I'm thinking a bit more personally because
 7 I'm the one who is supposed to make these
 8 recommendations and, if we have a state of affairs where
 9 the Post Office has got Plan A, shall we say, and the
 10 Government has got Plan B, I think it's a bit optimistic
 11 to think that Wyn Williams can produce the all-embracing
 12 Plan C.
 13 But, anyway, there we are. Let's have a break.
 14 **MR BEER:** Sir, the plan is to break until 3.00 and then
 15 we'll switch to Core Participant questions. I haven't
 16 finished by questions yet.
 17 **SIR WYN WILLIAMS:** No, no, I understand that.
 18 **MR BEER:** Because I think you know, and some of the Core
 19 Participants know, that Mr Henry can't be here tomorrow.
 20 **SIR WYN WILLIAMS:** No, no, that's fine by me.
 21 **MR BEER:** He is going to ask questions between 3.00 and
 22 4.00.
 23 **(2.45 pm)**
 24 **(A short break)**
 25 **(3.03 pm)**

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Questioned by MR HENRY

- 1
2 **SIR WYN WILLIAMS:** Mr Henry.
3 **MR HENRY:** Thank you, sir.
4 Good afternoon, Mr Read.
5 **A.** Good afternoon.
6 **Q.** Together with Ms Page, I represent a small cohort of
7 broken people who are yearning for justice, hoping
8 against bitter disappointment that they can move on and
9 find some resolution, and I'm sure you understand that.
10 **A.** I do.
11 **Q.** You would accept, would you not, that the wrongful
12 prosecution of the subpostmasters is an atrocious
13 chapter in the Post Office's history?
14 **A.** Unquestionably.
15 **Q.** Convictions were procured, it seems, on a fraudulent
16 basis --
17 **A.** Yes.
18 **Q.** -- material non-disclosure?
19 **A.** That's correct.
20 **Q.** Of course, even if subpostmasters weren't prosecuted,
21 there was a culture of prejudice that then existed,
22 a rush to judgement or a default setting that Horizon
23 was never at fault, that the shortfalls were always in
24 some way connected to the stupidity or incompetence of
25 the subpostmaster?

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- 1 agree, is an attempt to restore a person's human dignity
2 and to put them in a position which they might have
3 reached, a level they might have attained, had they not
4 had their lives stolen from them?
5 **A.** That is the objective of redress, yes.
6 **Q.** So it should not be a box ticking exercise but should
7 fairly assess and properly reflect the many varieties of
8 loss that these appalling injustices have inflicted on
9 the subpostmasters?
10 **A.** Yes, I would agree.
11 **Q.** Now, that is a very important factor, would you not
12 agree: the life that they might have led without
13 dishonour or disgrace, that can't be brushed under the
14 carpet by the Post Office, can it?
15 **A.** No, it can't.
16 **Q.** You would agree that, if the subpostmasters and their
17 dependents are treated unfairly during this compensation
18 process, then the Post Office's own reputation, perhaps
19 even its future, is doomed?
20 **A.** Yes, I think that's fair.
21 **Q.** Yes, because it would be the most appalling irony or the
22 most dreadful repetition of past history if the Post
23 Office in the past, having exploited the law to its
24 wrongful advantage, did so again, to find some way of
25 evading its proper responsibility to the people it

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- 1 **A.** Yes, that's absolutely what we've learnt.
2 **Q.** Of course, this protracted episode, now well over two
3 decades in length, represents, as I'm sure you will
4 agree, the most shameful, brutal and sustained breach of
5 trust in the company's history?
6 **A.** Yes, that's fair.
7 **Q.** You would agree that it's a nadir that the Post Office
8 will not even begin to recover from until full and fair
9 compensation is paid to its victims?
10 **A.** That's absolutely correct.
11 **Q.** Now, wrongful accusation leading to conviction brings
12 a person's life to a shuddering halt. I'm sure we can
13 all agree on that.
14 **A.** Yes, we can.
15 **Q.** The trajectory of their lives thereafter is either
16 flattened or crushed by that injustice but you would
17 accept that, even when that wrongful accusation is
18 removed, some wounds never heal and some injuries can
19 never properly be compensated for?
20 **A.** That's certainly my experience from the restorative
21 justice meetings that I have attended.
22 The long-term impact is profound.
23 **Q.** And it spreads across the family?
24 **A.** I agree.
25 **Q.** Yes. Compensation, insofar as possible, you would

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- 1 wronged?
2 **A.** Yes, I would agree.
3 **Q.** Of course, if the Post Office drags its heels, the same
4 applies?
5 **A.** Yes, that's correct.
6 **Q.** So it follows that the most important thing that the
7 Post Office under your stewardship should be doing, is
8 to facilitate the speeding up of meaningful
9 compensation, to avoid the postmasters living in penury
10 or, as we heard at the very beginning of your evidence,
11 in fact before you gave evidence, Mr Read, dying before
12 receiving proper redress?
13 **A.** Yes, that's correct.
14 **Q.** Now, I think we can still rely on The Times Newspaper.
15 Data obtained by The Times under Freedom of Information
16 laws revealed that 263 subpostmasters and
17 subpostmistresses had died since being wrongly accused
18 of stealing money because of the computer accounting
19 errors and, of that 263, 251 died before receiving
20 compensation. That's a terrible statistic, isn't it,
21 Mr Read?
22 **A.** It is a terrible statistic. Yes, it is.
23 **Q.** 251 never receiving an apology or recompense, and I am
24 sure you would struggle to find words to convey the
25 injustice of that?

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1 **A.** No, it's a terrible situation.
 2 **Q.** Each death, during this process, before compensation has
 3 been made, is an obviously serious matter, you would
 4 accept that?
 5 **A.** Yes.
 6 **Q.** It could show that the process isn't fit for purpose or
 7 it isn't working properly if the claims take so long
 8 that, unfortunately, people die before they receive
 9 compensation?
 10 **A.** I think that's a fair conclusion.
 11 **Q.** Now, I want to now concentrate on something slightly
 12 more specific than the vagaries of fate because,
 13 obviously, people can die for a variety of reasons at
 14 any time. But do you know how many of those dead
 15 subpostmasters' claims were delayed or denied on
 16 technical legal grounds?
 17 **A.** No, I don't know that.
 18 **Q.** Has the Post Office made any study of why the process is
 19 so slow and whether its lawyers are to some extent
 20 responsible for the delays?
 21 **A.** I don't think I would call it a study but we are acutely
 22 conscious, as you'll have seen over the last two days,
 23 and particularly the compensation meetings that I've had
 24 with the Government and with the Minister, we spend
 25 a lot of time trying to work out how do we improve and

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1 are in a dispute, whether that's in the HSS scheme or
 2 the OC scheme, we do pay interim payments up to that
 3 particular level, and then we have a debate about, and
 4 a discussion about, how we can come to a conclusion.
 5 That is my understanding.
 6 **Q.** I see. Now, I wonder, and there are so many cases, but
 7 I'm going to take you to the case of Mr Sivasubramaniam
 8 Jayakanthan, and you may not have heard of him but he
 9 was a subpostmaster in Putney. He was audited,
 10 interviewed and suspended on 4 March 2005. His Post
 11 Office was peremptorily shut down that very same day
 12 before a full investigation had taken place -- 4 March
 13 2005 -- and later that night, he hanged himself, and his
 14 wife Gowri found his lifeless body in the loft. His
 15 fate earlier that day was probably the same as described
 16 my Mr Justice Fraser in the Common Issues Judgment at
 17 paragraph 886, and I quote:
 18 "Suspended subpostmasters are not only entirely
 19 excluded from the Post Office part of their premises,
 20 they appear to be excluded, in some cases, from the
 21 entire premises and also are completely denied access to
 22 any information or records."
 23 Now, no wrongdoing was ever established against that
 24 man, and although the shortfall was on the automatic
 25 telling machine or cashpoint, it was reported through

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1 speed up the process. That is a constant point of
 2 conversation with myself and the Minister and others.
 3 **Q.** But returning to the issue I was raising: it would be
 4 a terrible thing if claims were being derailed by clever
 5 legal points, which right-thinking people might even
 6 regard as chicanery.
 7 **A.** Yes, it would be.
 8 **Q.** Would it ever be right, in your view, to reject a claim
 9 on a technicality?
 10 **A.** To reject an entire claim on a technicality? That would
 11 seem the wrong thing to do. My understanding is that we
 12 have learnt lessons in that particular respect and we
 13 now, where there are disputes or where there are issues
 14 associated with technical reasons, we have got ourselves
 15 to a position where we pay interim payments and we try
 16 and work out how we resolve those particular disputes.
 17 That's my understanding of how we've evolved.
 18 **Q.** So to reject an entire claim on a technicality would be,
 19 in your view, would it be fair to say, unconscionable?
 20 **A.** It would seem -- it would certainly seem a strange
 21 approach and I don't believe that we are doing that now.
 22 It may well have been the case and we've learnt, and
 23 we've listened and we've moved on but I didn't believe
 24 that was the case now. As I said before, I think we've
 25 got ourselves to a position where we have -- and if we

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1 Horizon. In November 2023, three years after she made
 2 her application to the Horizon Shortfall Scheme, Gowri
 3 Jayakanthan's application was rejected, and I'm just
 4 going to tell you what the two stated reasons for that
 5 rejection was, Mr Read.

6 The first was that the company that her husband had
 7 used so many years before to contract with the Post
 8 Office, had been dissolved; and the second reason was
 9 that the loss was not a Horizon shortfall, because it
 10 had arisen through use of the ATM, even though the data
 11 in question was, and had been, processed via Horizon.

12 That can't be right, can it, Mr Read, to do that to
 13 that woman?

14 **A.** That doesn't sound right, Mr Henry, I would agree with
 15 you. I am not familiar with this case, as you rightly
 16 point out. I don't specifically get into individual
 17 cases. However, as you quite rightly say, the principle
 18 seems peculiar, given that Horizon was clearly involved
 19 in the ATM processing.

20 **Q.** The people representing you, and I don't mean you
 21 personally, I'm talking about the institution, but they
 22 would have known that, at the time of the tragedy, she
 23 was the mother of two young children, infants under the
 24 age of five, whom she had to raise thereafter on her
 25 own, having suffered years of financial hardship and

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1 insecurity because she lost her livelihood, as well as
2 her husband.

3 So you outright reject, it could never be acceptable
4 for the Post Office's lawyers to take a technical point
5 like that, blocking her path to closure and
6 compensation?

7 **A.** I think, in the context of where we have gone over the
8 last three or four years, it does seem, in the way that
9 you describe, to be a -- a desperate situation, I agree.

10 **Q.** Now, leaving aside the issue of the three-year delay,
11 I want to now deal -- very, very briefly because we're
12 going to touch on it a little bit later -- with the
13 inception of the schemes. I accept, of course, that you
14 were very, very recently in post and so, therefore, you
15 were very much dependent upon people to advise you.

16 But there isn't any question, is there, of extremely
17 tight restrictive eligibility criteria being used to
18 deter claims: narrow, legalistic criteria to reject
19 claims and claimants; you would reject that?

20 **A.** Sorry, as an accusation against the organisation?

21 **Q.** The HSS scheme, for example. Take that as the focus.
22 Whether there were narrow legalistic criteria to reject
23 claims and claimants, I mean, you would be shocked if
24 that were the case, would you not?

25 **A.** Well, my understanding is that the bar for entry into
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1 the damages should go up, or the compensation award
2 should go up; do you agree?

3 **A.** Yes, if suffering is being extended unnecessarily,
4 I think that's a fair assumption.

5 **Q.** Yes. Now, given your research and the evidence that has
6 been given to this Inquiry, I am sure you're driven to
7 accept that the Post Office over many years strove to
8 delay the revelation of exculpatory material that would
9 have enabled criminal appeals to have been brought
10 swiftly?

11 **A.** I think we've certainly heard that, and we can agree
12 that that has been the case.

13 **Q.** Yes. I mean, no need to go over old ground but it is
14 important to note: the non-disclosure of the Clarke
15 Advice from 2013 to 2020, concerning Mr Gareth Jenkins,
16 I mean, Mrs Misra could have brought an appeal in 2013
17 or 2014, had that not been suppressed; do you agree?

18 **A.** Yes.

19 **Q.** Yes. Mr Butoy, Mr Moloney's client that I have
20 permission to mention, a Legacy Horizon case from 2007,
21 he went to prison in 2008 for 39 months. His appeal was
22 rejected in 2018 and the Court of Appeal Criminal
23 Division had the Horizon mantra put before it, and the
24 Horizon mantra -- I mean no disrespect, Mr Read, but
25 it's: no evidence that the Horizon system was shown to
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1 the HSS scheme was as low as it could be, it was
2 certainly lower than any legal metric, so we were trying
3 to encourage people to come forward. So, yes, I would
4 suggest that wasn't how it was set up or designed to be.

5 Now, the implications of the scheme and the errors
6 that we have made subsequently, I would -- and I'm sure
7 we'll discuss them a little later -- but certainly the
8 principle of establishing the scheme was to ensure that
9 we gave fair redress.

10 **Q.** Now, there's another dimension that I want to address,
11 and that's whether the compensation sums being offered
12 are adequate. That, of course, would depend on many
13 variables, which you would not be necessarily familiar
14 with in each individual case ask but, as a general
15 principle, would you agree that the misconduct of the
16 Post Office causing and prolonging the suffering of the
17 subpostmasters over many years, that would be a relevant
18 factor?

19 **A.** Yes, I would.

20 **Q.** So if the Post Office deliberately delayed, denied or
21 obstructed appellate rights, it should pay more,
22 shouldn't it?

23 **A.** Yes, that would make sense.

24 **Q.** Because, of course, it would thereby be wrongly
25 prolonging the suffering of its victims and so therefore
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1 be unreliable or open to errors; whilst as with any
2 computer system errors from time to time may crop up;
3 Horizon is largely reliable; the proportion of alleged
4 and detected defects related to the Post Office branch
5 accounting is minuscule, in comparison with the overall
6 operation of the system; used in 11,600 Post Office and
7 multiple in-branch users daily to provide financial
8 services and counter operations on a national scale.

9 So his appeal was rejected in 2018 but he was
10 cleared in April 2021 as part of the Hamilton judgment.
11 Now, I think, with a degree of understatement, that it's
12 fair to say, is it not, Mr Read, that the Court of
13 Appeal in 2018 didn't get the full picture, did they?

14 **A.** It sounds like that was the case.

15 **Q.** I mean, without pulling any punches, they were misled
16 because the truth about Legacy Horizon, as was held by
17 Mr Justice Fraser, was very different from that which
18 was put before the Court of Appeal?

19 **A.** Yes.

20 **Q.** Yes. So that mantra was a slogan to finesse what very
21 senior management by then in 2018 ought well to have
22 known: that Horizon, leaving aside its commercial
23 application, was wholly unreliable and unfit for
24 forensic purpose, in other words to bring a case in
25 court to deprive a person of their liberty; you would
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1 agree with that?

2 **A.** Yes, I would.

3 **Q.** Right. So given this history of obviously meritorious
4 appeals being delayed and the appeal procedure being
5 unnecessarily prolonged, you would accept, and in fact
6 you were very candid about this in your witness
7 statements, that the Board, the Senior Executive Team,
8 historically the institution, prioritised its commercial
9 and reputational interests as opposed to doing justice
10 to the subpostmasters?

11 **A.** I said there was very definitely a focus on
12 profitability and commercial sustainability, rather than
13 on the wellbeing and the development of the postmaster
14 contract. Absolutely I did, yes.

15 **Q.** Now, again, just dealing with the mindset and accepting
16 the fact that you were only just in post, the Post
17 Office was even being advised in 2019 that the Criminal
18 Cases Review Commission might never make a referral. To
19 use a colloquialism -- and these aren't the words used
20 by the learned counsel who was advising the Post
21 Office -- but the CCRC might blink. Would you accept
22 that, given what this Inquiry has established, the Post
23 Office ought to have been banging on the door of the
24 CCRC, the DPP and the CPS, saying, "You've got to refer
25 these cases, they're unsafe"?

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1 criminal appeals, they should pay more, and you may have
2 been advised on this already, and I don't seek to know
3 your advice because that's privileged, but when
4 a wrongdoer causes harm intentionally, or recklessly, or
5 with gross negligence, then a court can award punitive
6 or exemplary damages and, on any fair consideration, you
7 would agree that this scandal qualifies as an obvious
8 case, in which such punitive or exemplary damages might
9 be eligible?

10 **A.** Agreed.

11 **Q.** Can you help me: does the Post Office advise claimants
12 of this potential claim in the schemes you administer?

13 **A.** I can't help you with that. I don't know the specific
14 details of that.

15 **Q.** I suggest that the Post Office does not.

16 **A.** Okay.

17 **Q.** The forms are silent on exemplary damages and,
18 specifically in relation to the HSS form, there is no
19 box for an applicant to claim exemplary damages.

20 Now, I'm going to come to that form in a little bit
21 more detail later but there is an appendix to the form
22 which gives some guidance to potential claimants and
23 there is no mention of exemplary damages anywhere in the
24 appendix. Now, you're not aware about that?

25 **A.** I'm aware of the appendix and I'm aware of the fact that

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1 **A.** When are we describing? Do you mean in 2018 or do you
2 mean subsequently?

3 **Q.** I'm talking about as soon as it came to pass that there
4 were serious problems with Horizon and certainly by
5 2019, after the receipt of the Horizon Issues Judgment,
6 the Post Office ought to have been banging on the door
7 of the CCRC saying, "You've got to refer these cases".

8 **A.** Yes, I can see where you're coming from.

9 **Q.** You agree?

10 **A.** Yes, I can see that.

11 **Q.** But you were being advised by your General Counsel, and
12 it's paragraph 23, page 12 of your third witness
13 statement, words to the effect "Don't dig into the
14 past".

15 **A.** Yes, the guidance that I received at that stage was that
16 my focus was very much on today's Post Office for
17 tomorrow and moving the business forward. So I think
18 that's fair.

19 **Q.** You know Santayana's famous dictum: those who do not
20 learn the errors of the past are condemned to repeat
21 them?

22 **A.** Yes, I didn't specifically learn that but I understand
23 where you're getting at.

24 **Q.** But, anyway, you have very candidly and properly
25 accepted that, if the Post Office prolonged and delayed

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1 it's effectively a review and a guidance about how
2 a decision is made and what has been considered, but
3 I am --

4 **Q.** You weren't aware of the omission about exemplary
5 damages?

6 **A.** Sorry, yes, I wasn't aware of the omission, yes.

7 **Q.** Yes. Now, given the array of legal advice you
8 receive -- and I emphasise I'm not criticising you
9 because you are dependent obviously on legal advice --
10 but shouldn't exemplary damages have been mentioned in
11 the form?

12 **A.** You would have thought so, in the way that you
13 described: that the potential heads of loss, which
14 I know there is no cap on any of those potential heads
15 of loss, or indeed on the specifics, they are considered
16 irrespective, but guidance would have been sensible and
17 I think that was the objective of the appendix.

18 **Q.** Yes. Now, it follows, your not being aware of it, but
19 something is being done in the name of the Senior
20 Executive Team, the General Executive, the Board,
21 something is being done on your behalf which is not
22 candid and which is not forthcoming because exemplary
23 damages ought to have been itemised as a potential head
24 of claim; do you accept that?

25 **A.** I --

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1 **SIR WYN WILLIAMS:** Well, I'm not sure that it's fair to ask
 2 a non-lawyer about when exemplary damages may be
 3 payable, Mr Henry.
 4 **MR HENRY:** But the possibility --
 5 **SIR WYN WILLIAMS:** No, let me finish.
 6 **MR HENRY:** Sorry, sir.
 7 **SIR WYN WILLIAMS:** The exemplary or aggravated damages in
 8 strict legal terms -- and I don't mean that in terms of
 9 a technicality but when they would be awarded by a court
 10 in England and Wales -- are clearly defined, are they
 11 not, and they're not the sort of damages that are
 12 necessarily payable for all tortious conduct, let alone
 13 breach of contract. So I think one has to be careful in
 14 what one is putting to Mr Read about this. I'm
 15 perfectly prepared to accept substantial submissions
 16 about this where there's a proper legal framework, so to
 17 speak.
 18 **MR HENRY:** So be it, sir.
 19 **SIR WYN WILLIAMS:** But I think getting Mr Read to agree or
 20 disagree about things about which he's really competent
 21 to answer -- I'm not sure it's helping me, put it like
 22 that.
 23 **MR HENRY:** I'll try to be more helpful.
 24 A lot of the people filling in these forms don't
 25 have legal representation; you would accept that?

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1 happen. I think it would be very fair to say that we
 2 set out on the journey of the HSS, and I can remember
 3 quite explicitly speaking with Alan Bates about the need
 4 to get a very simple application form -- so you're quite
 5 right -- and the guidance that we discussed at that time
 6 was that a lot of individuals had suffered enormous
 7 trauma, a lot of individuals were deeply concerned about
 8 the relationship with the Post Office and, as
 9 I discovered on my restorative journey -- justice
 10 journey, people didn't even want to open letters from
 11 the Post Office, people didn't want to engage with the
 12 Post Office, they were so traumatised.
 13 So the guidance was very much let's find a way to
 14 make sure that people don't need to engage in a legal
 15 process but they can submit a claim, and I think what
 16 I've learnt and I think what you're describing now, is
 17 the principle of doing that was probably right, in the
 18 sense that I think people were deeply troubled by the
 19 notion of engaging with the legal system, they wanted
 20 a way to submit a claim and receive redress.
 21 And we didn't get there, for a multitude of reasons.
 22 Perhaps we may discuss this later but we didn't get
 23 there and I think that is of some regret from my
 24 perspective. That's for sure.
 25 **Q.** No doubt it would be a matter of regret to you if that

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1 **A.** I would accept that.
 2 **Q.** You don't pay for legal representation for people to
 3 fill in the forms, do you?
 4 **A.** Correct.
 5 **Q.** Yes. Now, I want to just ask you to consider this:
 6 candour and transparency from now on -- or not from now
 7 on but it ought to have been the touchstone about what
 8 people could claim and certainly in the advice document,
 9 particularly given the fact that you're dealing with
 10 people who don't have legal representation. Right.
 11 Can you see history repeating itself because,
 12 admittedly, a lot of this occurred before you came on
 13 board, Mr Read, but there were years of delay subverting
 14 the appeal process, which you've accepted, and fighting
 15 the GLO tooth and claw, weren't there, before you came
 16 on board.
 17 **A.** That's correct.
 18 **Q.** Now, echoing the past, we've got five years of delay
 19 and, I suggest, attrition in the compensation process,
 20 and that history is repeating itself; what do you say to
 21 that?
 22 **A.** I think the visibility that has been shone on the
 23 compensation schemes by Parliament, through the Select
 24 Committee, by the Inquiry itself, and by the general
 25 media would suggest to me that that is not going to

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1 supposedly simple and non-legalistic process -- and, in
 2 fact, the Chairman of the Inquiry, on 8 December 2022,
 3 actually was concentrating on that, that it should be
 4 a non-legalistic process -- you would be deeply
 5 concerned, wouldn't you, if it was mutating into
 6 a legalistic or adversarial process?
 7 **A.** I would.
 8 **Q.** You have already touched upon the potential, as it were,
 9 conflict or impossibility or unwisdom, to use that word,
 10 of the Post Office being involved in these schemes
 11 because, as you've rightly pointed out, the former
 12 subpostmasters want to have no interaction with the Post
 13 Office at all, some of them, because of the deep trauma
 14 they have suffered. But also, does it not place you in
 15 a state of conflict because, if you were candid and
 16 transparent and saying, "You've got to claim this,
 17 you've got to claim that, you've got to claim the
 18 other", then of course you would be racking up the
 19 amount of money you would have to pay in compensation,
 20 wouldn't you?
 21 **A.** That's an inevitable conflict, yes, you're right.
 22 **Q.** Yes. You've already said, not in so many words, that
 23 the Post Office's role in administering two out of the
 24 three schemes is both wrong and untenable?
 25 **A.** Mm-hm. I probably didn't use those words but I think it

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1 was inappropriate and I've said that many, many times.
 2 **Q.** Yes. The delay and discreditable disputes concerning
 3 compensation would exacerbate that lack of trust, would
 4 it not?
 5 **A.** Yes, it would.
 6 **Q.** It would continue to poison the relationship that exists
 7 with the victims and further besmirch the character of
 8 the Post Office?
 9 **A.** I've been very clear that speedy and fair redress is
 10 essential to protect the long-term interests of the Post
 11 Office and, obviously, the relationship between the Post
 12 Office and the victims of the scandal. We haven't lived
 13 up to that and that, as I say, is of deep regret.
 14 **Q.** Yesterday you said this:
 15 "I've looked at my contemporaneous notes ..."
 16 That would be of conversations with the shareholder
 17 and the Government:
 18 "... and I think I may well have disclosed something
 19 to this effect, that the way it was portrayed to me was
 20 that the Treasury were of the opinion that the chaos --
 21 I think was the word they used -- had been caused by the
 22 Post Office, there was a desire for the Post Office to
 23 experience some of the discomfort that had been caused."
 24 **A.** That's what I said, yes.
 25 **Q.** Now, I don't dispute that that was said to you but
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1 occasionally we can speak to the Department who, in
 2 turn, will speak with the Treasury.
 3 So there is an obfuscation, I think, by definition
 4 of me as the personification, I guess, for want of
 5 a better word, of the Post Office and the funder.
 6 **Q.** Yes. Whoever was calling the shots, however, the
 7 decision that you should be involved -- the Post Office,
 8 that is -- in two out of the three schemes was thereby
 9 exposing a teetering institution, which is virtually
 10 insolvent, to further reputational damage and criticism.
 11 **A.** I do hold that view, yes.
 12 **Q.** Yes. The Government is using the Post Office as
 13 a shield or fire curtain, isn't it?
 14 **A.** That could be a description, yes.
 15 **Q.** The fact that you're administering two out of the three
 16 schemes gives the Government a degree of protection,
 17 being at one remove gives it room for plausible
 18 deniability, where they can detach themselves from
 19 criticisms levelled at the Post Office, can't they?
 20 **A.** That's true.
 21 **Q.** They might even be instructing you to minimise or
 22 suppress compensation claims whilst avoiding public
 23 scrutiny?
 24 **A.** No, I don't think they've asked us to do that, but
 25 I think they are one step removed but, at the same time,
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1 somewhat odd for a shareholder to want that, isn't it?
 2 **A.** Well, I think you're raising an interesting question
 3 about the shareholder. The shareholder has many guises,
 4 and I think it would be fair to say that is the
 5 ministers, that is the Department, that is UKGI, that is
 6 the Treasury. I think this idea that this notion of
 7 "the shareholder" is quite confused, in the sense that
 8 there are competing and different objectives from
 9 different elements of "the shareholder", as you put it,
 10 and I say that in my witness statement: that one of our
 11 challenges is to define very clearly who is the
 12 shareholder and are their objectives aligned because
 13 ministers, departments, UKGI, Treasury, have different
 14 objectives, and that is a challenge for us all.
 15 **Q.** So was the Treasury calling the shot when you gave that
 16 evidence yesterday?
 17 **A.** That -- well, ultimately, we have a single source of
 18 funding, whether that's for the long-term future of the
 19 Post Office or whether that indeed is for compensation
 20 and that is from the Treasury, and I don't understand or
 21 know about the inner workings of how departments
 22 interact with the Treasury. What I do know is that
 23 an arm's-length body isn't allowed to interact with the
 24 Treasury. One goes through either the shareholder
 25 representative, in this sense UKGI, or indeed
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1 hold the levers of funding.
 2 **Q.** Have they expressed concerns about the bill?
 3 **A.** No, I think it would be fair to say that there is
 4 an inevitability about it. I don't believe the
 5 Department has expressed a concern. I think they
 6 recognise that freeing up the funds from Treasury is
 7 never easy and, therefore, determining what that
 8 business case could look like and how it works, again,
 9 is a question for the Department and for UKGI. But, no,
 10 I would say that there is recognition that the bill is
 11 significant and they must get on and deal with it.
 12 **Q.** So that there's no quibbling about the bill, this could
 13 all be wrapped up quickly if the money were put on the
 14 table?
 15 **A.** Well, my sense is that, with the intervention of the
 16 previous Secretary of State, back in September '23, and,
 17 again, with the mass exoneration and the availability of
 18 the £600,000 fixed fee for the overturned convictions
 19 and the £75,000 for the HSS, they have put their mouth
 20 where their money is, would be my suggestion.
 21 **Q.** I'm going to suggest that the 600,000 is woefully
 22 inadequate for some cases, as is the 75,000. So can
 23 I just ask you, then, what is the cause of the delay: if
 24 the Government says, or you have been told, that there's
 25 no quibbling about the bill, there's a realisation that
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1 the money has to be paid, what are the reasons for the
 2 delay?
 3 **A.** Well, I think agreement has now been reached, certainly
 4 in HSS, for the 75,000 fixed back and the 75,000 fixed
 5 forward. We will be writing out to 25,000 additional
 6 postmasters to make them available -- to make the scheme
 7 available. So I think that process, I think, is
 8 happening and will happen this month. So I think one
 9 should be confident that we will get on and execute as
 10 a consequence of that. I think that there is definitely
 11 progress now in the overturned convictions. I think
 12 principles have been established. I think the process
 13 has been firmly agreed. I think the 600,000 is starting
 14 to work. So that is happening.
 15 And my sense -- and you'll be able to speak, I know,
 16 to Simon Recaldin when he comes next week on the
 17 specifics of some of these issues -- that having taken
 18 an inordinate length of time, particularly in OC, to
 19 establish some of the principles, that is now done and
 20 I think I would like to think that we will see
 21 compensation flowing -- I use that word advisedly -- in
 22 a way that it hasn't been to date.
 23 **SIR WYN WILLIAMS:** Do you mind if I ask a question a moment,
 24 Mr Henry?
 25 **MR HENRY:** Of course, sir.

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1 the right word, then the Government needs to sign off.
 2 So the principles that have been established in terms of
 3 the early neutral -- the ENE process, they have been
 4 established with some guidelines for heads of loss, and
 5 ranges. If those ranges are -- and the agreement is
 6 from the panel that actually it should be outside of
 7 those ranges, then that has to be signed off by the
 8 Government.
 9 **SIR WYN WILLIAMS:** Right. So even though there is
 10 an independent panel, which has agreed what the sums
 11 should be --
 12 **A.** Correct, sir.
 13 **SIR WYN WILLIAMS:** -- it is at least, in theory, possible
 14 that the Government could say no.
 15 **A.** In theory, that is possible, yes.
 16 **SIR WYN WILLIAMS:** So the next question is: has that ever
 17 happened?
 18 **A.** I'm not aware but others may have a view. I don't --
 19 **SIR WYN WILLIAMS:** You don't know?
 20 **A.** I don't know.
 21 **SIR WYN WILLIAMS:** All right. Thank you.
 22 Sorry, Mr Henry.
 23 **MR HENRY:** No, no. Thank you, sir.
 24 So just dealing with the £600,000, that could never
 25 be appropriate for a high-value case, could it?

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1 **SIR WYN WILLIAMS:** Take the HSS --
 2 **A.** Yes.
 3 **SIR WYN WILLIAMS:** -- and truncating it, so we can give
 4 Mr Henry his full time allowance, it gets to a point --
 5 and I'm talking about the high-value cases in HSS, all
 6 right?
 7 **A.** Yes, yes.
 8 **SIR WYN WILLIAMS:** There gets to a point in time where
 9 an independent panel has said, "We think the value of
 10 this is X". Right?
 11 **A.** Correct.
 12 **SIR WYN WILLIAMS:** Let's assume there's a happy state of
 13 affairs and the postmaster is likely to agree that sum,
 14 all right, because you're not really far apart.
 15 **A.** Okay.
 16 **SIR WYN WILLIAMS:** At any point in this process, does
 17 Government authority have to be obtained for individual
 18 settlements?
 19 **A.** Yes, it does.
 20 **SIR WYN WILLIAMS:** Right. Thank you.
 21 **A.** Every time -- would you like me to explain that a bit
 22 more?
 23 **SIR WYN WILLIAMS:** Yes, please.
 24 **A.** So every time that the guidelines associated with
 25 individual heads of loss are either breached, if that's

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1 **A.** No, I think you're right. We both know that in the
 2 600,000 for the overturned convictions but also the 75
 3 for the HSS, there will be plenty of individuals for
 4 whom this will not be appropriate. But it will be
 5 a good medium for many and I think that the point --
 6 that is the point.
 7 **Q.** What do you say to Mrs Blakey's widower, who stated that
 8 he had to accept the £600,000 because he was worn out
 9 and that he didn't have the energy to fight on because
 10 it had been so drawn out and so painful that he just
 11 decided, "I just have to accept the £600,000"?
 12 **A.** I think that's desperately sad and my understanding was
 13 that the -- is that the interim payment would cover that
 14 specific cost and, if there was a need to go above and
 15 beyond 600, then that would be possible. So I'm sad
 16 that he felt unable to continue with that process.
 17 That's not what the process was designed to do. We were
 18 keen to ensure that people got closure, which, by
 19 definition, means there will be many who will want to go
 20 above and beyond 600,000, and we would want them to be
 21 in a position where they can come to a point of closure
 22 with the Post Office and with the Government.
 23 **Q.** So you reject any suggestion that the Government has
 24 been tight with the purse strings?
 25 **A.** No, I don't believe it has been tight with the purse

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1 strings. I think the process is overly bureaucratic.
 2 I would fully acknowledge that. I think the
 3 establishment of principles in -- as an example, the
 4 establishment of principles in HSS, when it was first
 5 set up, took an inordinate length of time. There are
 6 many examples, I think, where bureaucracy got in the
 7 way, things have gone wrong. I don't think that is
 8 necessarily borne out by people, you know, being
 9 malicious in any way. I just think that is a poor
 10 process, rather than it being anything more than that.

11 You know, certainly I know there will be people in
 12 this room who have had dealings with the Post Office and
 13 I'm sure they've been deeply frustrated by it but
 14 I wouldn't -- it's not because the purse strings are
 15 being closed tight.

16 **Q.** You've talked about bureaucracy and you've said,
 17 "I don't think it's about anybody being malicious",
 18 "malicious" is a very strong word but what about
 19 old-fashioned attitudes? Has the delay been caused
 20 because of the Post Office's historic, dyed in the wool
 21 prejudice against subpostmasters?

22 **A.** No, I don't believe that. I don't believe that.
 23 I think that would be an unfair conclusion to come to.
 24 I think it genuinely is a case of old-fashioned
 25 bureaucracy, if that's a different way to put it.

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1 to engage with them, getting the CCRC to help us, and it
 2 was a source of great concern, certainly to me, back in
 3 the summer of 2023, when we were discussing this with
 4 the Advisory Board, that we couldn't find a way to get
 5 people to come forward. And we sought the CCRC's help,
 6 we sought other's support, we even enquired of the CCRC
 7 if we could bring cases forward to the CCRC without
 8 postmasters necessarily being aware of it, as in to try
 9 and get those convictions overturned, which is something
 10 that we did, but was rejected by the CCRC and the Court
 11 of Appeal, obviously, because postmasters need to be
 12 involved in that process.

13 So it was, a -- and remains a -- clear frustration
 14 and a clear recognition, I think, that the Post Office
 15 role in this particular process of remediation and of
 16 redress, you know, first and foremost is the wrong one,
 17 and we shouldn't be involved in that process.

18 **Q.** Yes. Earlier on you've denied that there is or was
 19 a deliberate policy of delay and deterrence based on the
 20 design of the forms. But I want to deal with this
 21 perplexing question of trying to get people to come
 22 forward. Have you heard of complaints about the
 23 complexities of the compensation process and the forms
 24 itself from subpostmasters?

25 **A.** Yes, we have.

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1 **Q.** You say it's unfair, but you can understand the concern
 2 surely --

3 **A.** Of course.

4 **Q.** -- typified, I regret to say, by your letter to the Lord
 5 Chancellor, which might have caused people enormous
 6 concern, that letter to the Lord Chancellor, which was
 7 reflective of an old-fashioned view, I suggest, Mr Read?

8 **A.** No, I don't believe that. I can see why people will
 9 have been frustrated by it. We had an obligation,
 10 I believe, to alert the Lord Chancellor to the work that
 11 we'd done and I think we worked quite extensively with
 12 the Advisory Board trying to work out and trying to
 13 understand how do we get more people to come forward,
 14 which is exactly what we tried to do. And, you know,
 15 you can see, I think, that there are minutes from the
 16 Advisory Board meeting that articulate that challenge.

17 **Q.** How do you get people to come forward, Mr Read, when
 18 your letter to the Lord Chancellor was in the terms it
 19 was, and also Mr Vamos' unsolicited letter -- I'm going
 20 to call it the "They must be guilty" letter -- which was
 21 inexplicably posted on the Post Office's website earlier
 22 this year. How can you get people to come forward if
 23 that is happening on your watch?

24 **A.** Well, we tried it many, many times, to engage with the
 25 700 convicted postmasters, both writing to them, trying

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1 **Q.** Have you heard, apart from what I've just mentioned
 2 about Mrs Blakey's husband, of subpostmasters settling
 3 for less because they didn't have the energy or the
 4 means to pursue their just entitlements?

5 **A.** No, I haven't, until you've mentioned that example.

6 **Q.** So you haven't heard about subpostmasters who sell
 7 themselves cheap, deterred by red tape or intimidated by
 8 the process?

9 **A.** I didn't get that sense and, certainly, if I look at the
 10 HSS scheme in particular, that wasn't my takeaway from
 11 that process.

12 **Q.** If the application forms have misinformed people as to
 13 their rights, or deterred them from applying -- but
 14 let's concentrate on if they have misinformed people as
 15 to their rights, that would be appalling, would it not?

16 **A.** I agree.

17 **Q.** Again, I have to be careful in light of the Chair's
 18 earlier observations but let's just concentrate on the
 19 Historic Shortfall Scheme very, very quickly. It's
 20 supposed to compensate subpostmasters who are not
 21 actually convicted of theft but were accused of theft.

22 **A.** That's correct.

23 **Q.** They lost their jobs, many were threatened with
 24 prosecution and forced to repay cash shortfalls, which
 25 were entirely fictitious and all of that, the stress,

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1 the suffering, the damage to their reputation, that
 2 should be compensated for, should it not?
 3 **A.** That's correct.
 4 **Q.** You know, from the evidence that we have heard, about
 5 subpostmasters being called thieves, spat at or shunned
 6 in their community, even in one case being attacked.
 7 All because of that false accusation.
 8 **A.** Yes, I am aware of that.
 9 **Q.** You know also, of course, about the fact that some of
 10 them had to move house because they had become pariahs
 11 in their locality?
 12 **A.** Yes, I sadly met many.
 13 **Q.** Now, as at June 2023, there have been about 2,500 HSS
 14 claims settled and the average settlement payment was
 15 only £32,000. Does that strike you as being rather low?
 16 **A.** I think there's a very long -- I was going to say --
 17 tale is the wrong word. I think there's a long -- let
 18 me put it another way: I think where fatalities or
 19 bankruptcies or others, obviously there are a smaller
 20 number of those, but there are a lot of very low claims,
 21 which I suspect is why the overall average is what
 22 you're suggesting. My point, I guess, is that, where
 23 they are more complex and where they are involving
 24 bankruptcy or fatality or anything of that nature, or
 25 indeed bigger claims, they're larger.

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1 said, he has stated and suggested that the HSS form is
 2 designed to deter claims for damages to reputation; what
 3 do you say to that?

4 **A.** I mean, he's clearly entitled to his view. I think what
 5 we have done as a consequence is that we have
 6 reconstructed the application form, so now that if you
 7 want to apply in the HSS scheme for 75,000 forward,
 8 I think it's now reduced to a mere 20 questions, and
 9 we've also recut the application form for those who
 10 don't want to apply for 75,000 but may have a more
 11 complex claim.

12 So I think we've learnt and listened quite
 13 extensively to the Select Committee, to this committee,
 14 to the commentary that has been run by postmasters and
 15 by others, and I would argue that -- not argue, I would
 16 state that we have made changes to the tax position,
 17 we've made changes to the complexity, we've reduced the
 18 scheme application form, and we've also spoken at length
 19 with DBT about an appeals process because we are very
 20 concerned, for exactly the reason you've just described,
 21 that we may find ourselves in a position where people
 22 were disadvantaged, we would say, you know,
 23 inadvertently, but if they have been, we clearly need to
 24 address that, and that is something that I'm alive to.

25 **Q.** I won't go into the argument about how the form is

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1 So I'm not sure the average necessarily paints the
 2 picture that --

3 **Q.** Well, anyway, let's return to the form. Would you agree
 4 that the form is lengthy, complex and legalistic?

5 **A.** Yes, I would.

6 **Q.** I don't know if you're familiar, but you may have been
 7 aware of the criticism by Mr Dan Neidle of Tax Policy
 8 Associates in respect of it?

9 **A.** I'm aware of his criticism, yes.

10 **Q.** Taking it quickly: the form and appendix, 14 pages in
 11 length but with other supplementary documents it's over
 12 20 pages of material, and, as you've already said, no
 13 legal advice, no payment of legal costs for completing
 14 the form. You would realise, as an institution, that
 15 you're dealing with a number of unrepresented
 16 applicants, correct?

17 **A.** Correct.

18 **Q.** Right. So, therefore, you must be assiduously careful
 19 to ensure that they're not misled?

20 **A.** Yes.

21 **Q.** Right. You've accepted the importance of a person's
 22 reputation and the stigma of false accusation, haven't
 23 you?

24 **A.** I have.

25 **Q.** Right. Mr Neidle, and you're familiar with what he

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1 misleading because I believe that would be better for
 2 submissions. So I will move on and ask you to just help
 3 me with a document which is POL00155397. I think you've
 4 been shown this document, have you not, Mr Read?

5 **A.** I'm not sure. If you could scroll down, I could see.

6 **Q.** By all means. It was provided to you earlier this week.

7 **A.** Can we scroll down, just so I can see it? Thank you.

8 **Q.** We'll take it --

9 **A.** Sorry, which piece are you taking me to?

10 **Q.** Yes, of course. Well, if we go to page 1, it's entitled
 11 "GLO Post Settlement GE" -- that's General Executive?

12 **A.** Group Executive.

13 **Q.** "Group Executive" -- forgive me -- "Paper", and
 14 presumably, therefore, you would have seen the paper
 15 itself?

16 **A.** Yes, I was in the organisation at this time, yes.

17 **Q.** Yes. This is what Mr Underwood says at page 1:

18 "... I am not sure Nick wants me to lead the
 19 Historical Claims workstream owing to my prior
 20 involvement in the Complaint & Mediation Scheme,
 21 Chairman's Inquiry and the GLO."

22 It goes to:

23 "I am not sure the workstream leads set out in
 24 Appendix 1 are set in stone yet", and then the words
 25 that I have just taken you to that have been

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1 highlighted.

2 Can you help me: weren't entry fees mooted at one

3 point before access to the HSS was allowed?

4 **A.** Entry fees, sorry?

5 **Q.** Yes, fees for applicants.

6 **A.** Sorry, I'm not sure what that means, actually, to be

7 honest.

8 **Q.** Well, in other words --

9 **SIR WYN WILLIAMS:** Mr Henry is suggesting that, before you

10 could enter the scheme, you had to pay a fee.

11 **A.** Oh, really? Okay.

12 **SIR WYN WILLIAMS:** As you do in court, in some instances,

13 for example. That's what he's asking you about.

14 Yes, Mr Henry?

15 **A.** I don't recall that being the case. It may well be but

16 I don't recall that.

17 **MR HENRY:** Could we go to page 2 of 5, and could we scroll

18 up, please -- maybe down, in fact. I'm sorry, when

19 I say up, I mean down.

20 If we keep going, yes, "Fees", exactly. Thank you.

21 So we've got Mr Underwood there saying:

22 "My strong view is that you cannot seek payment from

23 applicants -- however small and regardless of the

24 rationale behind it. Optically this would be extremely

25 challenging and would be a position that I believe the

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1 **A.** Possibly.

2 **Q.** Yes. It's a more subtle and insidious method of doing

3 it but it makes it difficult for subpostmasters to

4 apply, to reduce the Post Office's disclosure. I mean,

5 for example, in the forms, they talk about the provision

6 of contemporaneous documents. How are you going to get

7 contemporaneous documents when many years have passed

8 and where the Post Office had seized them and, as in

9 Mr Lee Castleton's case, never returned them? It's

10 a hurdle, isn't it? Not a low hurdle, but it's actually

11 a high bar. That was the design, wasn't it?

12 **A.** It's certainly -- you could certainly draw that

13 conclusion from this paragraph.

14 **Q.** I remind you, we've dealt with it very briefly already,

15 paragraph 886 of the Common Issues Judgment:

16 "Suspended SPMs are not only entirely excluded from

17 the Post Office, part of their premises, they appear to

18 be excluded in some cases from entire premises and also

19 are completely denied access to any information or

20 records."

21 Then Mr Justice Fraser said this:

22 "Given the severe effect upon a subpostmaster of

23 having their appointment terminated, it is not only

24 important, but I would go so far to say crucial, that

25 they're given a reasonable opportunity to meet a case

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1 business would struggle to maintain under political and

2 media pressure. I think you can achieve the same

3 desired outcome [through] having [it says 'though']

4 a very tight and clearly communicated set of eligibility

5 criteria and requirements in terms of the documentation

6 applicants have to provide in order to be accepted into

7 the Scheme."

8 Now, that's an atrocious line of thinking, is it

9 not, that, at one point, the Post Office would seem to

10 have been discussing charging fees to be paid by the

11 wronged victims of the Post Office before they would be

12 allowed to enter into the scheme?

13 **A.** It does seem a bizarre --

14 **Q.** Yes. I suggest, as is clear from what Mr Underwood was

15 saying, was that the same desired effect, the same

16 outcome, would be strict -- very tight, in other

17 words -- eligibility criteria, very tight and clearly

18 communicated set of eligibility criteria and, of course,

19 the documentation subpostmasters would have to provide

20 before being accepted into the scheme. He suggested

21 this would have the same desired outcome, didn't he?

22 It's clear --

23 **A.** It does look as though that's what is implied.

24 **Q.** I suggest that was to restrict access to the scheme and

25 to deter applicants, isn't it?

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1 being brought against them by the Post Office. It is

2 difficult to see how they can have such an opportunity

3 if they are denied access even to copies of information

4 or records."

5 That judgment came out on 15 March 2019. This email

6 is January 2020. By that time, the people in this

7 email, one of whom, of course, was Mr Williams, Rodric

8 Williams, would all have known the difficulties for

9 subpostmasters of obtaining contemporaneous documents,

10 when these were historic events that had occurred many,

11 many years before and where they had been subjected to

12 such unfairness; do you agree?

13 **A.** That's a concerning conclusion, yes.

14 **Q.** You all knew -- and I don't mean that pejoratively to

15 you, Mr Read -- but those advising you all knew, when

16 this demand for contemporaneous document was hatched,

17 that subpostmasters would have great difficulty in

18 complying with it; that must be right?

19 **A.** That's a disturbing conclusion, yes.

20 **Q.** Yes. Now, Mr Read, I realise you were, to some extent,

21 put in this job to a degree under false pretences

22 because you had no idea -- no idea -- what you were

23 letting yourself in for, but you would agree that you

24 were not the solution you promised to be, despite

25 everything you did?

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1 A. Not the solution I promised to be; what do you mean?
 2 Q. Well, the compensation process is not being dealt with
 3 fully, fairly and quickly. That must be right?
 4 A. I think, to a degree, that's fair.
 5 Q. Yes. It's the same, I suggest, dyed in the wool
 6 inability of the Post Office to treat those it
 7 destroyed, or very nearly destroyed, with dignity,
 8 respect and justice?
 9 A. I would like to think we've learned the lessons of this.
 10 I think it has been slow and painful for the Post Office
 11 to do so. I think, culturally, we've had to come a long
 12 way to do that but I would it argue that those lessons
 13 have been learned. I think the changes that we have
 14 made, certainly over the last few months, particularly
 15 to the schemes, to the approach that we've adopted, to
 16 the way that we've engaged with victims, has changed.
 17 I would hope that people in the room had identified
 18 that but we're obviously open to feedback accordingly.
 19 But I think, certainly since the compensation hearings
 20 and since the drama at the start of this year and since
 21 the Select Committee, I think we've learnt those
 22 lessons, I think the shareholder has too and I think
 23 there is a great deal more understanding.
 24 This process has hugely helped in shining a light on
 25 some of the practices of the past. I think we are
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1 MR BEER: I will, sir.
 2 SIR WYN WILLIAMS: Yes, thank you.
 3 (4.08 pm)
 4 (The hearing adjourned until 10.00 am the following day)
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1 genuinely open and moving towards a better system.
 2 There are proper appeals processes, proper
 3 independent panels now working, there is a commitment,
 4 certainly from the Shareholder, from a funding
 5 perspective, and there is a commitment from the Post
 6 Office to get this right.
 7 I do believe some of the principles are now in
 8 place. I do believe that the process is such that
 9 things will start to flow but I would also acknowledge,
 10 and I think you've been very generous in pointing it out
 11 today, that mistakes have certainly been made, and
 12 I would agree with that.
 13 SIR WYN WILLIAMS: Thank you, Mr Henry.
 14 MR HENRY: Thank you, sir.
 15 SIR WYN WILLIAMS: You will know, Mr Read, that in each of
 16 my progress updates and in my interim report, I drew
 17 attention to the oft-repeated phrase, both by Post
 18 Office and Government, that "compensation would be full,
 19 fair and prompt". Forget "prompt" for the moment. Can
 20 you assure me that it is still the aim of Post Office to
 21 provide compensation which is full and fair?
 22 A. I can assure you.
 23 SIR WYN WILLIAMS: Fine. Thank you.
 24 Then we'll adjourn now until tomorrow morning when
 25 you'll resume your questioning, Mr Beer.
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