

Wednesday, 16 October 2024

(10.03 am)

MR STEVENS: Good morning, sir. Can you see and hear us?

SIR WYN WILLIAMS: Yes, thank you very much.

MR STEVENS: Sir, we'll be hearing from Tracy Marshall this morning.

SIR WYN WILLIAMS: Yes. Can Ms Marshall be sworn, and then I'll raise a very short matter with you.

MR STEVENS: Of course.

TRACY LOUISE MARSHALL (affirmed)

SIR WYN WILLIAMS: Mr Stevens, the issue which I wish to raise with you relates to some questions which Mr Beer asked of Mr Read last week in respect of one or more emails going back to 2010 or 2011, which apparently were emails of which this witness will have knowledge. Let me try and put it as neutrally as possible.

My understanding, Mr Stevens, is that Mr Read (*sic*) did that in order to probe whether Ms Marshall was an appropriate witness to give evidence on behalf of the Post Office in respect of what I'll call current policies and practices, and that was why he was raising issues from many years ago.

You have made me aware, quite properly, that you intend to ask some questions about events in the period -- and I'm deliberately choosing a wide period so

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A. Tracy Louise Marshall.

Q. Thank you for attending today to give evidence and thank you for providing a written statement, to which I want to turn now. You should have a copy in front of you.

A. Yes, I do.

Q. Is that dated 22 August 2024?

A. It is.

Q. Now, before I turn to your signature, I understand there are a few minor changes to make, which I will take you through now, given they're minor in nature. If we could have the statement on the screen, please, and page 4. In paragraph 10(a), you are discussing terms that you used throughout the statement and you will see in the third line from the bottom you say, "save for 114 Directly Managed Branches". I understand that should read "111"?

A. Correct. Thank you.

Q. Page 12, please. If we go down to paragraph 30, please. Here you're talking about amendments to terms of contract between the Post Office and subpostmasters, and you say, "Following the ClJ", which is Common Issues Judgment], Post Office made the decision to amend the template NT Terms", referring to Network Transformation terms --

A. Yes.

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that nobody thinks it's confined -- between, say, 2010 and 2013 of this witness and, therefore, I have had to consider whether or not it is appropriate that this witness be given a direction about self-incrimination, that direction having been given to a number of witnesses who gave evidence about that period in time.

My current view is that, notwithstanding that there will be some questions about that period, it is not necessary for me to give that direction to Ms Marshall but I wanted you to have the opportunity of making any observations about that current view before you start questioning, so to speak.

So is there anything you'd like to say about that?

MR STEVENS: I agree, sir, and nothing further.

SIR WYN WILLIAMS: Fine. Then we'll proceed but I should make it clear, as I hope is obvious to everyone, that, in respect of something like a direction against self-incrimination, I keep that under review throughout the whole of the witness's evidence, and so it's open to me to change my mind, so to speak, if I think it appropriate.

MR STEVENS: Thank you, sir.

SIR WYN WILLIAMS: Over to you, Mr Stevens.

Questioned by MR STEVENS

MR STEVENS: Please can you give your full name?

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Q. -- and I understand and after that should read "and SPSO"?

A. Yes, that is correct.

Q. That is an abbreviation, SPSO, for the Standard Subpostmaster Contract?

A. That's correct.

Q. If we can please turn to page 47. In paragraph 108, you describe responsibility for various matters. You say: "... however any changes to the scope of the Postmaster Contract would go through SEG and the Post Office Board for approval."

I understand after "Postmaster contract" it should read "or associated policies"?

A. Correct. Thank you.

Q. Finally, page 60, please. If we could go right to the bottom of the page there's a footnote, which we may need to zoom in to. Given the nature of the correction, I'll just deal with it as a footnote, rather than the context. It says, "Reinstatement refers to the period following suspension, or post-termination decision on appeal", and then I understand where that word "appeal" is, the words thereafter should be struck through and, in the place of those words, it should say "where the postmaster is reinstated in their role"?

A. Correct. Thank you.

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1 Q. Thank you. The statement can come down from the screen.
 2 Thank you.
 3 Can I ask you, please, to turn to page 78 of the
 4 statement.
 5 A. Yes.
 6 Q. Below paragraph 199, you should see a signature.
 7 A. Yes.
 8 Q. Is that your signature?
 9 A. It is, yes.
 10 Q. Can you confirm that the contents of the statement are
 11 true to the best of your knowledge and belief?
 12 A. They are, yes.
 13 Q. Thank you, Ms Marshall. That now stands as your
 14 evidence in the Inquiry. It will be published on the
 15 website shortly, the Inquiry's website, and for the
 16 record, the URN, the unique reference number, is
 17 WITN11610100.
 18 Now, Ms Marshall your witness statement was provided
 19 in response to two Rule 9 Requests to Post Office as
 20 a company itself, rather than addressed directly to you.
 21 A. That's correct, yes.
 22 Q. For reasons I don't need to go into now, you have been
 23 put forward as a witness to speak on behalf of Post
 24 Office on various matters in your statement?
 25 A. I have, yes.

5

1 roles, predominantly for the next four or five years,
 2 I'd say, working to franchising of our directly managed
 3 branches, so converting them from Crown status to being
 4 operated by postmasters, working with a number of
 5 independent postmasters and larger corporate entities
 6 too.
 7 Q. What period of time are we discussing when you were
 8 doing that role?
 9 A. That would be up to 2007.
 10 Q. Whilst you were working with franchising and
 11 postmasters, were you working with matters such as
 12 appeals or suspensions, anything like that, during that
 13 period?
 14 A. No, nothing like that at all. This was simply working
 15 with potential applicants to take on new branches and
 16 making sure that the transition from the Crown branch
 17 being operated by a new postmaster went smoothly, so
 18 nothing at all to do with suspensions or investigations.
 19 Q. Then, from 2007, what role did you have?
 20 A. So from 2007, I moved to be the Programme Office Manager
 21 for a programme called Network Change. Network Change
 22 involved the closure of around 2,500 branches, from
 23 memory, and the implementation of what we now call
 24 Outreach Services, things like mobile vans across the
 25 network. That was a Government-funded programme and

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1 Q. You are currently the Retail Engagement Director with
 2 Post Office Limited?
 3 A. Yes, I am.
 4 Q. When did you first join the Post Office?
 5 A. I joined in 1998, so I've been here for just over
 6 25 years/26 years.
 7 Q. What was your role upon joining?
 8 A. I joined as a graduate trainee, initially, for 18 months
 9 and then I've progressed through the organisation
 10 through a variety of roles.
 11 Q. If we pause there, as a graduate trainee, very brief
 12 summary, what sort of work did you do?
 13 A. There were three six-month secondments, one of them was
 14 working in a directly managed branch, they used to be
 15 called Crown branches; one of them was shadowing an Area
 16 Manager, I think they were called Retail Line Managers;
 17 and the third role was in Head Office, a very
 18 administrative role within the finance function, just
 19 getting knowledge of Head Office operations.
 20 Q. What role did you go into after being a graduate
 21 trainee?
 22 A. So I then went into being a Branch Manager in one of our
 23 Crown branches for just over two years.
 24 Q. What was your next role?
 25 A. After that, I did a variety of project and programme

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1 I effectively, for the next three years, ran a programme
 2 office effectively making sure that we were on track
 3 with budgets, that we had reporting in place to our
 4 shareholder and that all the necessary documentation
 5 went out to the right postmasters.
 6 Q. So that's 2007 to 2010, roughly. Can I just check, you
 7 may have been involved with Post Office closures as part
 8 of the programme; at that stage, were you involved in
 9 any respect in the termination of subpostmasters'
 10 contracts because of alleged breaches, such as through
 11 discrepancies and the like?
 12 A. No, I was not.
 13 Q. From 2010, what was your role, please?
 14 A. For the next two years, I was Agents Development
 15 Manager. I had responsibility in that role working to
 16 Kevin Gilliland for postmaster remuneration, and our
 17 postmaster contracts, which at that time were being
 18 updated in preparation for the next change programme
 19 which was Network Transformation.
 20 Q. Were you involved in, as part of that, termination or
 21 suspension of postmasters as a result of alleged
 22 discrepancies?
 23 A. I was not, no.
 24 Q. Then from 2012, what was your next role?
 25 A. From 2012 through to 2017 or '18, I was involved in the

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1 Network Transformation Programme. So this was the
 2 programme to ultimately convert post offices to new
 3 models, the main model and the local model.

4 **Q.** So, again, do I take it from that, not involved in
 5 termination/suspension, those sorts of matters?

6 **A.** I was not involved no.

7 **Q.** From 2017, please?

8 **A.** 2017 to now, more senior leadership roles, responsible
 9 for initially some of our network strategy, and then,
 10 more recently, stepping into more of my current
 11 accountabilities around postmaster onboarding and
 12 postmaster training and some postmaster engagement.

13 **Q.** Your roles and responsibilities now, when did you start
 14 undertaking those roles?

15 **A.** So for onboarding and training, which you've seen me
 16 talk about in my statement, I'd been doing that for
 17 about four years, I would say; my responsibility for the
 18 Contract Management and Deployment team, only for the
 19 last year.

20 **Q.** Thank you. I want to look at a particular period,
 21 I think it's when you're Agents Development Manager --

22 **A.** Yes.

23 **Q.** -- 2010 to 2012. Did you say you reported to Kevin
 24 Gilliland?

25 **A.** I did.

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1 accountability for the team of Contract Advisers in the
 2 network. From time to time, John or Lin Norbury, who
 3 may have been his boss at the time, would often copy me
 4 in on emails for information purposes but I don't know
 5 why I would have been copied in here, specifically.

6 **Q.** So, outside of this specific email, what was your
 7 working relationship with John Breeden -- not in terms
 8 of how did you get on: what substantively did you work
 9 on together?

10 **A.** So because I had accountability for, at this point,
 11 postmaster remuneration and the postmaster contracts
 12 themselves, sometimes John Breeden would reach out to
 13 myself or my team to ask for advice on the content of
 14 the contracts, for example, or advice on the structure
 15 of remuneration with postmasters.

16 **Q.** Those issues you just referred to don't appear to be
 17 raised in this email.

18 **A.** Agreed.

19 **Q.** To what extent, at this time, were you involved with
 20 Post Office's response to allegations that had been
 21 raised by Justice for Subpostmasters Alliance?

22 **A.** I don't think I was involved with any of those
 23 allegations.

24 **Q.** If we go to page 2 of the email, please. This is
 25 an email that's extremely well known to the Inquiry. It

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1 **Q.** In what team or department did you sit in that role?

2 **A.** Kevin was, I want to say, Director of Network and Sales,
 3 so this was -- Kevin had wider accountabilities for the
 4 network. He may have had responsibility for some of the
 5 field teams. He certainly had a team responsible for
 6 the relationship with the National Federation of
 7 SubPostmasters, and he had a team focused on sales
 8 capability in our branches, so a fairly wide remit.

9 **Q.** Can we please bring up POL00088956. We see an email on
 10 5 December 2010 from John Breeden, it's to Angela van
 11 den Bogerd. If we just scroll down slightly, please, to
 12 see the email that has been forwarded, we see an email
 13 from Lynn Hobbs to John Breeden is being forwarded on.

14 If we can go back to the top, please, we see that
 15 Mr Breeden addresses it to Angela van den Bogerd but
 16 copies you in. We see you're the second person on the
 17 CC line. The subject says, "Follow up" to a meeting
 18 with the department with the JFSA, and it attaches some
 19 documents regarding that.

20 I know you've seen this email and I'll come to the
 21 contents of it shortly, but, firstly, why at this stage
 22 would John Breeden copy you in to an email like this?

23 **A.** Having read the email train, I'm not completely sure why
 24 I would have been copied in. I don't recall the email.
 25 John Breeden, I remember, had the Contracts team, he had

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1 says, "My reply to Mike and Rod". It says:
 2 "I have found out this week that Fujitsu can
 3 actually put an entry into a branch account remotely."
 4 It goes on to say how that was found. Final
 5 sentence:
 6 "One solution, quickly discounted because of the
 7 implications around integrity, was for Fujitsu to
 8 remotely enter a value into a branch account to
 9 reintroduce the missing loss/gain. So [Post Office]
 10 can't do this but Fujitsu can."
 11 Do you recall whether you read that email at the
 12 time?

13 **A.** No, I don't recall reading the email at the time. I was
 14 surprised to see it when it was disclosed to me as part
 15 of the Inquiry. It's not something I would have been
 16 involved with, to my recollection, as part of the role
 17 that I was in at the time.

18 **Q.** Let's move forward a month, if we can, please.
 19 POL00294728. This is an email from you to Kevin
 20 Gilliland, who you said earlier was your line manager?

21 **A.** He was, yes.

22 **Q.** We see Angela van den Bogerd is also an addressee of
 23 this email and Helen Rose is copied in. The subject is
 24 "Horizon system issues". It refers to conversations
 25 you'd had with Andy McLean and Dave Hulbert yesterday,

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1 you believe you made progress with the outstanding
2 questions raised.

3 Does this not show that you were involved with Post
4 Office's response to allegations about the Horizon IT
5 System and its integrity?

6 **A.** No, I don't think it does and, if it would help the
7 Inquiry for me just to provide little bit of context, if
8 that's okay?

9 **Q.** Yes, please.

10 **A.** Okay. So, as I've said, during this time I worked Kevin
11 Gilliland and my accountabilities were very specifically
12 on postmaster remuneration and postmaster contracts.
13 Very often, Kevin would ask members of his lead team, of
14 which I was one of them, to go off and find information
15 about other matters that were not relevant to the roll
16 you were doing to assist him in whatever he was doing in
17 his role. From what I've read of this email, this is
18 clearly to me and, whilst I don't recollect it at the
19 time, it is clear to me that he was asking me to go off
20 and find information out to perhaps prepare him for
21 a meeting that he was going to with Angela shortly
22 afterwards.

23 I don't think I would have known -- certainly
24 wouldn't have known, the ins and outs of the Horizon
25 system, I wouldn't have had any involvement in remote

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1 In the last email I took you to, which referred to
2 remote access, it referred to it not being used due to
3 integrity concerns, but broadly speaking. Did you know
4 why you didn't refer to the integrity concerns that were
5 raised in that email when you reported to Angela and
6 Kevin in this email?

7 **A.** I don't and, you know, on reflection, I should have
8 joined the dots and, when typing this email to
9 Mr Gilliland, have noted the previous email, assuming of
10 course I read it, and I'm very sorry that I didn't do
11 that, in hindsight. But I would, you know, say again
12 this was an area very much outside of my expertise and
13 comfort zone and it's very clear to me that I wouldn't
14 have written this without very clear direction from
15 experts on what to say.

16 **Q.** So do I take it that your evidence is, effectively, what
17 you have written down here is what you would have been
18 told by Andy McLean and Dave Hulbert?

19 **A.** Absolutely.

20 **Q.** That document can come down.

21 I want to go to a slightly different issue, please.
22 POL00119947. This is an undated letter but we see from
23 the first page that it refers to an appeal hearing on
24 7 December 2010, and then correspondence on 28 February
25 2011, which gives us an indication. If we can just turn

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1 access. So my view of this email is that I have gone
2 off, found information from the Subject Matter Experts,
3 in this case Andy McLean and Dave Hulbert within the IT
4 Team, and have relayed that information to Kevin
5 Gilliland.

6 **Q.** If we just scroll down slightly, please. You give some
7 commentary on remote access. You say:

8 "[Post Office] cannot remotely access systems and
9 make changes to specific stock units etc. Fujitsu can
10 remotely access systems and they do this on numerous
11 occasions to a network wide basis in order to remedy
12 glitches in the system created as a result of new
13 software upgrades.

14 "Technically, Fujitsu could access an individual
15 branch remotely and move money around however this has
16 never happened yet."

17 You go on to refer to authority processes that are
18 in place and say:

19 "If a change were made remotely and to an individual
20 branch, it would be flagged on the business data ledgers
21 and would appear as a 'mismatch' in P&BA in
22 Chesterfield.

23 "So although changes can be made remotely, they
24 would be spotted and the person making the change would
25 be identified."

14

1 the page, please, and go towards the bottom, we'll see
2 it was sent by Craig Tuthill. At the time, so early
3 2011, where did Craig Tuthill sit in the organisation to
4 you?

5 **A.** Craig -- I think at this time, whereas I was in a Head
6 Office function, Craig was in a field role managing the
7 Contract Advisers or certainly working very closely with
8 them. He may have worked to Lynn Hobbs at this period
9 of time.

10 **Q.** Was there any reporting line to you on that basis?

11 **A.** No, not at all.

12 **Q.** Can we turn back to the first page, please, and go down,
13 please. Thank you. It says:

14 "Throughout the appeal hearing and the written
15 submissions you have raised doubts about the integrity
16 of the Horizon accounting system and have offered no
17 other reason for the losses incurred. You are adamant
18 that neither you nor any of your staff acted
19 dishonestly."

20 It goes on to say a few lines down:

21 "I have also sought and received confirmation from
22 Tracy Marshall, Post Office Limited Agents Development
23 Manager, that [Post Office Limited] is fully satisfied
24 that the Horizon system and accounting processes around
25 it are robust and fit for purpose. She confirms the

16

1 system is endorsed by the National Federation of
 2 SubPostmasters and has been subjected to independently
 3 assured testing processes, information security is
 4 accredited to industry standards and the system also
 5 meets all payment industry standards."

6 I mean, do you recall Mr Tuthill coming to you about
 7 this appeal?

8 **A.** Not specifically. Again, I saw this in my bundle.
 9 I don't remember this specific example. It would have
 10 been quite usual for Craig and his team to come to
 11 people in the centre, in the Head Office, if you like,
 12 to ask for a view on the business's position and, from
 13 time to time, I would, in my role here, have gone off to
 14 our Communications Team to find lines to send back out
 15 to the field teams.

16 **Q.** So I'll take you to a different document. It's
 17 POL00119963, please. We see it's an unusual format but
 18 it appears to be an email from you to Craig Tuthill on
 19 Monday, 28 February 2011. You say:

20 "Craig/Andy,
 21 "This is the formal words used in external
 22 communications. I would be happy to circulate this to
 23 the contracts community if you think this is fit for
 24 purpose?"

25 I think your evidence earlier was that you would

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1 a corporate witness. You know that Fujitsu's ability to
 2 access branch accounts remotely and Post Office's
 3 knowledge of that ability is being considered by this
 4 Inquiry?

5 **A.** I do.

6 **Q.** From the emails we looked at, would you accept that you
 7 were involved, to a certain extent, in the distribution
 8 of knowledge on remote access within Post Office?

9 **A.** I would accept here that there are emails where I've
 10 relayed information to people that concern remote
 11 access, the very core issue to the purpose of this
 12 Inquiry. But I wouldn't say that I was involved or
 13 implicit in anything involving remote access.

14 **Q.** To whatever extent you were involved, do you think that
 15 you're an appropriate person to give evidence on behalf
 16 of the Post Office because of that even limited extent
 17 of involvement?

18 **A.** I think I am, and my role, particularly over the last
 19 three or four years, has focused on delivering
 20 improvements and changes for postmasters on a number of
 21 core areas, including training and onboarding,
 22 et cetera. So I do think I am best placed in the
 23 organisation to be able to talk to those improvements
 24 and about what the current position is.

25 **Q.** Can I ask, the matters we've just discussed now, why

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1 check with the Communications Team about what the
 2 business position was; is that effectively what this is
 3 showing?

4 **A.** I believe so, yes. I believe this is an example of when
 5 I've been asked a question, I've conferred with our
 6 Communications Team in the Head Office and this form of
 7 words here would have been standard -- the standard
 8 position lines used in external communications that I've
 9 been provided with, via the Comms Team.

10 **Q.** Did you have any role in or did you take any steps to
 11 satisfy yourself that what was said there was accurate?

12 **A.** I don't think I would have done, no. I think I was
 13 relying on the information being provided to me by more
 14 senior leaders within the organisation.

15 **Q.** Thank you. That document can come down.

16 Aside from that type of matter there, where
 17 an Appeals Manager is coming to you for a business
 18 position on Horizon and you're giving an external
 19 communication, during that period of time in 2010 to
 20 2012, were you involved in inputting or assisting
 21 Appeals Managers with making decisions on termination
 22 or, indeed, Contract Managers on making decisions on
 23 termination of subpostmasters?

24 **A.** No, I was not.

25 **Q.** As we said earlier, you have been put forward as

18

1 were they not referred to in your witness statement?

2 **A.** My witness statement was in response to specific Rule 9
 3 Requests, two of them, and that is the basis,
 4 ultimately, of my witness statement that I've prepared.

5 **Q.** One further point before we move on to matters in your
 6 statement, please could we have POL00448411. It's
 7 a letter that's been seen by the Inquiry before, to
 8 various people, including, sir, to you and to Mr Beer.
 9 It's 28 May 2024, and it says:

10 "We are writing to you as a group of highly
 11 disenfranchised [Post Office] employees ..."

12 Have you read this letter before?

13 **A.** Only when it was provided to me as part of my bundle.

14 **Q.** If we can go to the bottom of this page, please, it says
 15 at the bottom paragraph:

16 "I am sure you have been made aware that we have at
 17 least 120 employees who have been in long-term roles who
 18 have conflicts of interest, ie they were operating in
 19 roles which to a greater or lesser degree were involved
 20 in the wrongful prosecution of SPMs. Read has known yet
 21 refuses to address the latter situation proactively,
 22 despite being asked to. He reacts only to the specific
 23 individuals after their names are called out in public.
 24 For instance Angela van den Bogerd mentioned in her
 25 statement the role of Tracy Marshall; the latter played

20

1 a prominent role in 2010/15 in the unlawful convictions
2 of subpostmasters."

3 Pausing there, what do you have to say to that
4 point?

5 **A.** I think -- I'm disappointed to see that there are
6 disenfranchised employees in Post Office, firstly, who
7 clearly have concerns about me, in my role. I think
8 there are some confusing facts in here that aren't quite
9 right. I've never played a role, any role, in the
10 unlawful convictions of subpostmasters. Whilst I can't
11 state factually, I suspect that this here is in direct
12 response, clearly, to the emails that we've just gone
13 through being shown in Mrs van den Bogerd's evidence in
14 Phase 5 or 6. But I'm disappointed that they feel that
15 way about me.

16 **Q.** It says:

17 "Despite this, just 3 years ago, Marshall was
18 appointed as the Postmaster Engagement Director, much to
19 our dismay (and no wonder the trust results plummeted).
20 However, only within the last week, Read has remove
21 Marshall from her role and appointed her into another
22 obscure role."

23 When did you change roles as Postmaster Engagement
24 Director?

25 **A.** So I've never been Postmaster Engagement Director,

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1 There was clearly a shift in Post Office's view of what
2 the contract meant following the Common Issues Judgment.
3 Can we have, please, page 5, paragraph 15 of your
4 statement on the screen. You refer to the Standard
5 Subpostmaster Contract, which I think we see in your
6 statement elsewhere as SPSO; is that right?

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

8 **Q.** You say it's the oldest contract, first introduced
9 between 1991 and 1994.

10 **A.** Yes, I believe so.

11 **Q.** Since that was introduced, is it fair to say the
12 majority of postmasters who originally signed on to that
13 contract have been transferred onto a different Network
14 Transformation contract?

15 **A.** That's correct.

16 **Q.** How many subpostmasters -- or postmasters, sorry --
17 remain on the Standard Subpostmaster Contract?

18 **A.** I don't have the specific figures to hand, I'm afraid,
19 so I can't really comment on that. I think it might be
20 around a thousand but I couldn't be sure.

21 **Q.** Does Post Office issue the Standard Subpostmaster
22 Contract to any new applicants or new subpostmasters
23 that it onboards?

24 **A.** Yes, it does, from time to time. There are still some
25 branches who are on an SPSO contract, who continue to

23

1 I think they're referring to Retail Engagement Director,
2 which is my current role. Following the email appearing
3 in Mrs van den Bogerd's evidence, I was asked to step
4 back from some of my role, so in late May/early June
5 this year, I stood down from the postmaster engagement
6 element of my role, effectively, which is a very small
7 team of two individuals, plus the Postmaster Experience
8 Director, Mark Eldridge.

9 So my role hasn't changed; I've just had some of my
10 responsibilities removed from it, and my role includes
11 now -- continues to include onboarding, training and the
12 Contract Management Team.

13 **Q.** Do you consider yourself to be in an appropriate
14 position to carry out those roles, given your past
15 involvement which we've discussed?

16 **A.** I think so, yes. I mean, for the last four years
17 particularly, my role has been completely focused on
18 trying to do the right thing by postmasters and making
19 changes to our policies, procedures, processes, and
20 listening to postmasters as much as I can, and trying to
21 make changes. So I do still feel as though I am in
22 a very good position to do my role.

23 **Q.** Let's look at some of those policies and procedures now.
24 I want to start with the types of contracts, the basis
25 on which Post Office contracts with subpostmasters.

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1 have the ability, if they wanted to, to sell their
2 branch and premises to a new postmaster on those terms.
3 It doesn't happen that often. I recall a couple of
4 hundred cases that I'm aware of over the last few years,
5 but, yes, it does happen.

6 **SIR WYN WILLIAMS:** Can I understand that: do you mean that
7 a postmaster on the Standard Subpostmaster Contract will
8 sell the branch to a new subpostmaster and then they
9 will still be on the old -- when I say "the old" -- on
10 the Standard Subpostmaster Contract?

11 **A.** That's correct, sir, yes.

12 **SIR WYN WILLIAMS:** Yes, fine. I understand, yes.

13 **MR STEVENS:** I want to look at what steps Post Office have
14 taken to clarify the written terms to subpostmasters of
15 the contracts following Common Issues. Can we turn to
16 page 12, please, paragraph 30. You say:

17 "Following the [Common Issues Judgment], Post Office
18 made the decision to amend the template NT Terms", and
19 it should say "and SPSO terms" --

20 **A.** It should, yes.

21 **Q.** -- "being issued to new postmasters to reflect the
22 court's determination (as set out in the Contract
23 Restatement Guide) and to focus on making operational
24 improvements and positive changes to the way it works
25 with postmasters, before making widespread changes to

24

1 its standard contractual terms."

2 I understand from your evidence what the Post Office
3 did was to send out a contract restatement document to
4 explain the effect of Common Issues?

5 **A.** Yes, it did.

6 **Q.** Can we look at that, please. It's POL00037518. Is this
7 the document to which we were referring, the contract
8 restatement?

9 **A.** It is, yes.

10 **Q.** How was this sent to postmasters in the network?

11 **A.** So from what I can understand, it was sent out to
12 postmasters electronically, via a channel known as the
13 One Communications Channel, this was a tool used by our
14 Communications Team quite regularly to send out messages
15 to postmasters so this was sent electronically.

16 **Q.** Why wasn't it sent in hard copy as well?

17 **A.** I honestly do not know. I wasn't involved at the time
18 but I believe it should have been sent out in hard copy.
19 All I can say is that, when we make any changes now to
20 our contract terms, we always make sure that hard copies
21 are sent out to postmasters, first and foremost so that
22 we have a record that it's been delivered and received
23 by the postmaster via Special Delivery. I can't comment
24 on why that wasn't the case here, I'm afraid.

25 **Q.** In your statement you say that Post Office did not have
25

1 contract, suggested changes.

2 **Q.** If I can pause you there, that's changes to a contract.

3 **A.** Yes.

4 **Q.** I'm interested in what Post Office is doing to explain
5 the contractual terms as they are at the moment. You
6 said in your evidence that wasn't a plan to issue this
7 in hard copy: why?

8 **A.** It's a very good question, something I think we need to
9 think again about as a business. All postmasters should
10 have access to this.

11 **Q.** Earlier in your evidence, you said previously it should
12 have been sent out in hard copy?

13 **A.** Yeah.

14 **Q.** Is there any good reason why it's not sent in hard copy
15 now?

16 **A.** No, absolutely none.

17 **Q.** Are you in a position to say the Post Office will at
18 least consider it?

19 **A.** We will absolutely consider, and I think we should make
20 sure that all postmasters have hard copies of this
21 document.

22 **Q.** If we look at what the document says, please. If we go
23 to page 2, it refers to the judgment, the Common Issues
24 trial, and then says:

25 "The judgment changes the meaning of the contracts
27

1 a system for ensuring that subpostmasters had read the
2 Contractual Restatement Guide.

3 **A.** Yes.

4 **Q.** Why not?

5 **A.** I don't know. I don't know and the business should have
6 done. When this -- what should have happened, in my
7 view, here is that this document was sent out in hard
8 copy to every postmaster by Special Delivery, so that we
9 had a record of it being received, first and foremost,
10 and it should have been followed up, in my opinion, with
11 check-ins from our field members to make sure the
12 postmasters had understood the terms and had received
13 them. I can't comment on why that didn't happen, I'm
14 afraid.

15 **Q.** Is there any plan in Post Office at the moment to
16 correct this issue by taking the steps you've just
17 suggested now?

18 **A.** So there are two things that we're doing. First of all,
19 it's making sure that this document here is available
20 for all postmasters to view again. That won't be hard
21 copy, for reasons I'll come on to, but it will be made
22 available and is on our Branch Hub tool.

23 The second thing that we are doing is looking at
24 what we call the Contract Reform Project. So we are
25 underway, with making some other changes to our
26

1 ..."

2 Do you know who came up with that wording "changes
3 the meaning of the contracts"?

4 **A.** I don't, I'm afraid.

5 **Q.** Do you agree with that?

6 **A.** I think, from what I know of the implied terms that have
7 been added into the contracts, I do think it changes the
8 meaning of the contracts, in that it's moved them --
9 it's certainly added more obligations on Post Office and
10 I think it is a fairer contract, particularly in the
11 areas of losses and shortfalls, for example. I'm not
12 sure if it specifically changes the meaning of the
13 contracts, however.

14 **Q.** Well, as you've noted there, it says:

15 "It implies (adds) some new terms to the contracts."

16 Has Post Office ever communicated to subpostmasters
17 that the terms that were found to be implied into the
18 contract in Common Issues Judgment applied before the
19 judgment was issued and not after it as well; so Post
20 Office was bound by them before the judgment?

21 **A.** I've not seen anything to suggest that, no.

22 **Q.** That can come down, thank you.

23 It has been suggested by some postmasters that it is
24 confusing to have a contract and then a separate guide
25 explaining it, such as this; what do you say to that?
28

1 A. I would agree. I think it's very important that every
 2 postmaster out there has a contract with those new terms
 3 added in to that contract. Again, I can't comment why,
 4 at the time, steps weren't taken to amend the contracts
 5 and send new contracts out and why it was simply done
 6 via a contract restatement guide.
 7 Q. That wasn't within your purview?
 8 A. No, it wasn't, no.
 9 Q. Do you know who made those decisions?
 10 A. I can't recall who would have been responsible for
 11 contract change at that time. Obviously, our Legal Team
 12 would have been very involved with it. It would have,
 13 I think, sat within the remit of Julie Thomas, who was
 14 one of the Operations Directors within the business but
 15 I can't be sure.
 16 Q. Just another point on this and how it was communicated.
 17 Can we please look at page 45 of your statement,
 18 paragraph 107. For context, in the main body of the
 19 paragraph, you refer to postmaster contracts and the key
 20 policies and guidance relating to contractual liability
 21 for postmasters. You then refer to the Contract
 22 Restatement Guide; is that the document we were just
 23 referring to on the screen?
 24 A. It is, yes.
 25 Q. You say:

29

1 Inquiry in due course?
 2 A. Quite possibly, yes.
 3 Q. Was there any other document which a postmaster could
 4 turn to that explained the effect of common issues,
 5 other than that contract restatement document?
 6 A. No other document specifically on -- that would explain
 7 the Common Issues Judgment impact. There are obviously
 8 a number of other contractual documents, such as the
 9 Operations Manual, which was updated around that time
 10 but that didn't specifically address CIJ impact.
 11 Q. Do you know why, as part of an archiving exercise, such
 12 an important document was taken down from Branch Hub?
 13 A. I don't, I'm afraid, no.
 14 Q. Can we look, please, at POL00448241. This is a Standard
 15 Subpostmaster Contract. If we turn to page 5, please
 16 and to the bottom, to paragraph 20, please, it says:
 17 "Each party shall:
 18 "at all times in the performance of its obligations
 19 and exercise of its rights under this contract act in
 20 good faith ..."
 21 So it looks like this is an amended contract
 22 following, or making changes as a result of, Common
 23 Issues; is --
 24 A. I agree. I think it is, and it's dated August 2020 in
 25 the footer of there.

31

1 "This document was published on the One
 2 Communication channel on 29 July 2020", which you just
 3 said in your evidence.
 4 A. *(The witness nodded)*
 5 Q. "As part of this exercise and responding to the Rule 9
 6 Requests, the Retail Team have been advised that, due to
 7 an archiving exercise, the document is no longer held on
 8 Branch Hub and the Retail Team have arranged to
 9 reinstate it so that it can be readily accessed by
 10 postmasters ..."
 11 Is that document now back on the One Communication
 12 channel.
 13 A. It's back on Branch Hub, yes.
 14 Q. Branch Hub, sorry, yes. The Rule 9 Request to which
 15 this statement was provided -- well, there were two,
 16 sorry: one was 12 June 2024 and one was 2 July 2024. Do
 17 you know when it was realised that the document wasn't
 18 on Branch Hub?
 19 A. Not specifically but it would have been around the time
 20 of those Rule 9 Requests coming in and me preparing my
 21 witness statement.
 22 Q. When you say it was taken down as part of an archiving
 23 exercise, when did that archiving exercise take place?
 24 A. I don't know, I'm afraid.
 25 Q. Is that something that the Post Office can tell the

30

1 Q. Yes, you say that. In your exhibit list to your
 2 statement at number 4, we don't need to bring it up, the
 3 document description is "SPSO Individual Contract v3
 4 December 2023".
 5 A. Okay.
 6 Q. Are you able to assist with when the changes were made
 7 to the subpostmaster contract to reflect what was said
 8 in Common Issues?
 9 A. So changes were made to the SPSO contract and the two
 10 Network Transformation contracts after the Common Issues
 11 Judgment was handed down, to the best of my knowledge in
 12 2020. There might have been some small iterations/
 13 changes to it since then but, fundamentally, the new
 14 implied terms were added in in 2020.
 15 Q. Just so we're clear, that applies, does it, to new
 16 subpostmasters joining the network. These are the
 17 contractual terms they're given upon joining?
 18 A. New postmasters joining the contract would get this,
 19 yes.
 20 Q. Thank you. That document can come down, thank you.
 21 Could we look, please, at your statement, page 12,
 22 paragraph 31 and 32. That's great, thank you. If you
 23 just go down a bit further to have 31 at the top.
 24 You give an example of changes made to various
 25 policies in the summer of 2020 and it sets out the range

32

1 of support available to postmasters and their staff.
 2 Then, if we go further down, thank you:
 3 "The Postmaster Support Guide is updated annually to
 4 take account of any changes ... The Postmaster Support
 5 Guide contains the following key areas ..."
 6 We see: general support; training; managing cash;
 7 branch balancing; accounting dispute resolution. So
 8 quite serious material issues for a subpostmaster, yes?
 9 **A.** Yes, issues that they would absolutely need advice and
 10 support on in running their branch.
 11 **Q.** Aside from this being written down as policies, what
 12 steps have been taken to ensure that there is
 13 appropriate resourcing to implement these policies
 14 properly?
 15 **A.** Okay, so just to clarify, the Postmaster Support Guide
 16 isn't a policy, as such. That's an overarching document
 17 providing advice and support to postmasters. In the
 18 back of the Postmaster Support Guide there is
 19 an overview of the 12 postmaster policies that we have
 20 put in place across all areas of the postmaster
 21 lifecycle, to assist internal colleagues and make sure
 22 that processes are followed correctly. Part of my role
 23 as being accountable for those postmaster policies is to
 24 make sure that the various teams can deliver them in
 25 their respective teams and, to do that, clearly they do

33

1 the very clear steer that I had.
 2 If it helps the Inquiry, though, we are in the
 3 process actually, right now, of putting each one of our
 4 12 policies onto a new template. That template is being
 5 developed by colleagues in Data Protection, the Legal
 6 teams and the Assurance teams, and those policies will
 7 be made available shortly to postmasters, following
 8 agreement, obviously, by our Audit and Risk Committee,
 9 and GE.
 10 **Q.** The last point on these policies: with the change in the
 11 policies, as they've changed and developed since Common
 12 Issues, has that placed more or greater obligations on
 13 Post Office than it did before the changes? So is there
 14 more to do, effectively, more work to do, to fulfil
 15 those policies than before?
 16 **A.** I think that's very true, yes, they have.
 17 **Q.** Has there been any increase in resources to meet those
 18 policies?
 19 **A.** There's been some increase in resources, in my own team,
 20 for example, who manage the policies. We do now have
 21 more people to make sure we are getting them annually
 22 reviewed by the right people, that we have group
 23 assurance as well in place now, checking our policies,
 24 checking our Control Framework and that we have actions
 25 in place to mitigate any of the key risks. So yes,

35

1 need resource to be able to do that effectively.
 2 Resourcing is a challenge, in some areas, if I'm
 3 honest. I'm very aware of the broader business issues
 4 that we have: we're funded by Government; there are cost
 5 challenges. I'm confident we do have resources in place
 6 to deliver against the policies. We could always do
 7 with a little bit more resource though, in some areas.
 8 **Q.** Firstly, the 12 policies you refer to, I think you use
 9 the word "internal" -- you do in your statement,
 10 I think -- subpostmasters don't have access to those 12
 11 policies, do they?
 12 **A.** Not at the moment, no. They don't have access to the
 13 full policies but what this is a guide to the postmaster
 14 policies, which is a shortened version of each one,
 15 effectively, that postmasters can view, which is on
 16 Branch Hub.
 17 **Q.** Why are they not given full access to the full policy?
 18 **A.** It's a question that I've debated quite a lot over
 19 recent years with various colleagues and our data
 20 protection legal teams, et cetera. The policies
 21 themselves, which are internally facing, have quite
 22 detailed information in them around our Control
 23 Framework, our risk appetite as a business and risks,
 24 and it wasn't felt appropriate to disclose that
 25 information externally, rightly or wrongly, and that was

34

1 resource has been put in place.
 2 **Q.** Can we look, please, at your statement page 17,
 3 paragraph 36. Thank you. This is coming back to
 4 something I cut you off on earlier. You're referring
 5 here:
 6 "In July 2024 the Retail Engagement Team presented
 7 a proposal for the Contract Reform Project to the
 8 Strategic Executive Group ..."
 9 Why has this Contract Reform Project been started;
 10 what's its purpose?
 11 **A.** As a business, we've been talking about doing a more
 12 widescale update of our contracts and getting new copies
 13 out to everybody for some time.
 14 **Q.** Okay, pausing there, when you say "some time", from
 15 roughly --
 16 **A.** I'd say a few years and, for whatever reason, the
 17 business decision has been taken not to do that activity
 18 at that particular point in time. To give an example,
 19 at one point, obviously, we were anticipating the
 20 rollout of our New Branch IT System into branches, and
 21 so it was considered that we should perhaps delay some
 22 of this work until that system was in and there may be
 23 changes that are needed as part of the introduction of
 24 that system. For a few years we've been talking about
 25 it.

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1 The Retail Team have been pushing quite strongly, as
2 have our Legal team, to make sure that we do this
3 activity. I feel this is very important for the reasons
4 I said earlier. I think it's important to get contracts
5 out to every postmaster, new contracts that do have the
6 implied terms in them, from the Common Issues Judgment.

7 We are now doing that. So we are -- we've already
8 made some proposed -- and I stress the word
9 "proposed" -- changes to the contracts with external
10 Legal, and our next stage, which will we'll be doing
11 later in October or November, is to go to our Strategic
12 Executive Group and take them through them, and the next
13 step will be then to engage with the postmasters; the
14 NFSP, obviously will need to be consulted with as part
15 of that process; look at what we're proposing to do; and
16 then, hopefully, we can get in a position where we send
17 contracts out.

18 **Q.** It might be said that a reason for not bringing these
19 contract proposals sooner and enacting them more
20 quickly, is to avoid the proposals being scrutinised by
21 this Inquiry; what would you say to that?

22 **A.** I don't think that's the case.

23 **Q.** Paragraph 36(b). You refer to "removing specific
24 rights". What right, at the moment, in the proposals,
25 are being envisaged to be removed?

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1 but, by the time I thought I would revisit that with
2 you, my connection had been broken. So one way or
3 another we got ourselves an extra five minutes. That's
4 what it boils down to.

5 **MR STEVENS:** Thank you, sir.

6 Right, I want to move on to training, please, and,
7 as Retail Engagement Director, you are accountable to
8 the Post Office Board for the design and implementation
9 of postmaster training?

10 **A.** That's correct.

11 **Q.** You are supported in that role by the Head of Training?

12 **A.** I am.

13 **Q.** I want to look at the job description, please, for Head
14 of Training. It's POL00448046.

15 So, job title, Head of Training. The Head of
16 Training obviously involves training for postmasters.
17 Are there any other types of worker -- I don't use that
18 in the technical sense -- for whom the Head of Training
19 is responsible for their training?

20 **A.** No, it's the development and delivery of training for
21 postmasters and those operating our branches. So it
22 would also be those working in our DMBs, for example.

23 **Q.** If we look, please, at page 3, and we've got the
24 "Knowledge, Experience and Skills": the leadership
25 first; second, experience or background of training;

39

1 **A.** I can't think of any specific rights, if I'm honest.

2 I can give some examples of other outdated terms and
3 references that might be removed, if that would be
4 helpful?

5 **Q.** Are there any rights, obligations or terms that could be
6 perceived to be beneficial to a subpostmaster that are
7 being proposed to be removed?

8 **A.** I don't believe so, no. In fact, I think the changes
9 are much more favourable to postmasters and more
10 obligations on Post Office.

11 **MR STEVENS:** Thank you. That can come down.

12 Sir, that's probably a good time to take our morning
13 break.

14 **SIR WYN WILLIAMS:** All right. So --

15 **MR STEVENS:** If we could say 11.15? Thank you.

16 (11.05 am)

(A short break)

17 (11.25 am)

18 **MR STEVENS:** Sir, can you see and hear us?

19 **SIR WYN WILLIAMS:** Yes, thank you.

20 **MR STEVENS:** Firstly, I'll apologise to the transcriber for
21 initial only undercooking our 15-minute break and then,
22 sir, I apologise to you for overcompensating by giving
23 a 20-minute one.

24 **SIR WYN WILLIAMS:** Mr Stevens, I did wonder about your 11.15

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1 third, knowledge of training related models; various
2 other matters including a good understanding of business
3 strategy, policies and operations.

4 There doesn't appear to be any need for knowledge or
5 experience of IT or Horizon; is that fair?

6 **A.** That is fair, yes.

7 **Q.** Why is that?

8 **A.** So I think, as the Head of the Training Team, the
9 individual's job is to provide leadership and make sure
10 that a good quality of training is being delivered.
11 Those working into the Head of Training and who are
12 delivering classroom training, for example, do
13 absolutely have to have a good knowledge about the
14 Horizon system, but I don't believe it's essential for
15 this particular role, providing leadership to that team.

16 **Q.** So who is responsible for the content of the training on
17 Horizon itself?

18 **A.** So ultimately, that would be me being accountable and
19 the Head of Training being responsible for the
20 production of all the content.

21 **Q.** To whom can you turn for advice on whether the aspects
22 of training relating to Horizon are appropriate or
23 sufficient for subpostmasters?

24 **A.** When we're developing our training content, be it
25 classroom courses or e-learning modules or Work Aids, we

40

1 are reliant on discussions with the various Subject
 2 Matter Experts within the business. So, for example, if
 3 there's something around cash and stock management, for
 4 argument's sake, we would go to our Cash and Stock
 5 Management Team. If there's something there around
 6 discrepancies, we would confer with Mel Parks team.
 7 **Q.** Many of the policy documents on training say that Post
 8 Office is committed to providing comprehensive training
 9 to postmasters.
 10 **A.** Yes.
 11 **Q.** What, if any, funding is there for postmasters to engage
 12 in training?
 13 **A.** So there's no particular funding provided to postmasters
 14 or anybody operating our branches, to go to training.
 15 So we don't, for example, pay for postmasters or their
 16 assistants to go to a training course. Over the last
 17 few years, many of our training has moved to being more
 18 digital in format and that's as a result of postmaster
 19 feedback and, of course, that collateral, which is on
 20 Branch Hub or our Learning Management System, is freely
 21 available to anybody working in a branch to access, free
 22 of charge.
 23 **Q.** It still requires them to commit hours to it?
 24 **A.** It does.
 25 **Q.** The hours they're committing to the training is hours

41

1 barrier preventing them from engaging with it?
 2 **A.** It could be. I've got no evidence to suggest that it is
 3 a barrier to them attending but it could be.
 4 **Q.** Do you have any data to understand how many people want
 5 to attend that course against, in fact, how many people
 6 in fact attended?
 7 **A.** No, I don't, we only have statistics on how many people
 8 do attend the course.
 9 **Q.** Is it fair to say that one of the purposes of training
 10 on matters like investigating discrepancies is to reduce
 11 discrepancies overall or at least reduce the need for
 12 Post Office to investigate them?
 13 **A.** I agree that there is -- the requirement for training on
 14 investigating discrepancies is ultimately to get to the
 15 root cause of the issue and prevent discrepancies from
 16 taking place in the first place. So the concept of
 17 investigating discrepancies is something that's very
 18 important. This classroom course here, the half-day
 19 classroom course, is just one aspect of that but, in
 20 addition, there's a variety of other material that has
 21 been developed and is available digitally, which will
 22 assist postmasters or members of their team, in helping
 23 them to investigate those discrepancies.

The digital format of training is something that we
 as a business, and I, want to explore more of. From

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1 they're not committing to their profitable business?
 2 **A.** That's true. It does require commitment, yes.
 3 **Q.** Presumably, for assistants, the hours that they have to
 4 commit to training, the postmaster has to pay them while
 5 they're doing that training?
 6 **A.** They would have to, yes.
 7 **Q.** Can we look, please, at your statement, page 22,
 8 paragraph 47. You say these some of the training
 9 courses that have been introduced since the Common
 10 Issues Judgment, and at (d) you refer to "Investigating
 11 discrepancies", and that's a half-day classroom course
 12 and Work Aid. That sounds like quite a significant or
 13 important piece of training that is available to
 14 postmasters; do you agree?
 15 **A.** It's proved to be very useful for postmasters, yes. And
 16 many of them who have attended it have said that it's
 17 been, you know, very positive, well received, with good
 18 levels of confidence, shall we say, after attending,
 19 yes.
 20 **Q.** Because it's a half-day classroom, that requires
 21 a postmaster or assistant to be out of the post office
 22 for at least half a day, yes?
 23 **A.** It does, yes.
 24 **Q.** Do you think the fact that postmasters aren't paid or
 25 remunerated for doing that course is a significant

42

1 what I hear from postmasters, you know, they're busy
 2 people running retail businesses as well, alongside
 3 their post office, and for many the preference is not to
 4 have to travel to a classroom, irrespective of costs.
 5 It is to be able to do training in the comfort of their
 6 own premises, their own home, perhaps in the evening as
 7 well. So that's something that we want to explore more
 8 of.
 9 **Q.** Is there any plan within the Post Office to consider or
 10 assess the impact of any proposals to fund
 11 subpostmasters or their assistants to do training?
 12 **A.** There's no proposals at the moment but, obviously,
 13 that's something that I can absolutely take back and
 14 consider in the wider business.
 15 **Q.** I want to look to at some of the training guides and --
 16 we don't need to bring it up -- in your statement you
 17 refer to, at paragraph 77, the Operational Training
 18 Guide being a fundamental tool for both new and existing
 19 postmasters?
 20 **A.** Yes.
 21 **Q.** Who is responsible for keeping that material up to date?
 22 **A.** That's the Training Team.
 23 **Q.** Could we look, please, at POL00448131. This is about
 24 monthly accounting for trading period balance; is this
 25 taken from the Operational Training Guide?

44

1 A. Yes, it is.

2 Q. It covers, as I say, monthly accounting and balancing.

3 Please could we go to page 3.

4 You've got "Settling discrepancies", and these are

5 options that are given to postmasters when there's

6 a discrepancy prior to rolling into the next trading

7 period. One is "Review Dispute CALL [Business Support

8 Centre]"; another is "Make good cash".

9 I'll be exploring that in more detail with

10 a different witness but I want to look at the content of

11 this document with you. Under "Make good cash", it

12 says:

13 "This is optional if you would like to settle the

14 discrepancy without disputing it. You can select this

15 option, then physically add or remove cash to balance

16 without a discrepancy."

17 Do you think that is a satisfactory description of

18 when subpostmasters -- or the guidance for

19 subpostmasters in using the "Make good cash"?

20 A. I do not think it's satisfactory.

21 Q. Why isn't it satisfactory?

22 A. I don't think that that is clear enough that, if any

23 postmaster or officer in charge chooses to put cash in

24 from their own pocket, effectively, they should do so

25 only if they are absolutely sure that it's due to

45

1 our operational training materials.

2 Q. When will this be corrected?

3 A. I think if it's not out there already now, it's imminent

4 by the end of October.

5 Q. Further down, it says, "How to dispute a discrepancy" --

6 we don't need to worry about Strategic Partner

7 branches -- it says:

8 "All other branches: Whichever option you use to

9 settle a discrepancy at the end of the trading period,

10 you can still dispute the discrepancy with Post Office.

11 To do this contact the Branch Support Centre.

12 "If you can demonstrate the reason for the

13 discrepancy or if you firmly believe the discrepancy

14 will be resolved through a Transaction Correction,

15 please call the Branch Support Centre with all the

16 details you have."

17 Is that not putting the burden on the postmaster to

18 show that the discrepancy is not the postmaster's fault,

19 rather than the investigative obligation being on the

20 Post Office?

21 A. Reading it back now, it could give that impression, yes.

22 And, again, that's something we should look at.

23 Q. Pausing there, you say "we should look at"; is this

24 currently not proposed to be amended as part of the

25 changes you were describing before?

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1 something that has happened in branch that is an error

2 of some sort, not with the system, but where you might

3 have, for example, given the customer £20 more,

4 et cetera.

5 We are in the process, actually, of updating this

6 section of the Operational Training Guide and any other

7 documentation that refers to something similar, to make

8 that message very clear.

9 Q. Just pausing there: you say "in the process", the date

10 on this document is July 2023 --

11 A. Yes.

12 Q. -- why has it taken so long to make what appears to be

13 a clear position of Post Office evident in the training

14 guide?

15 A. And that's a very good point. I think whilst people

16 within Post Office, myself, our teams, are very aware

17 ourselves of what should happen, ie you should only put

18 cash in if you're absolutely certain that it's something

19 that's been done in the branch, not related to an issue

20 with Horizon or something that needs to be investigated

21 further, it's one thing for us to think that. I don't

22 think we've quite got that message across to

23 postmasters. There's no excuse. It should have been

24 done quicker but I'm comforted by the fact that we're

25 now doing it and taking the opportunity to review all of

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1 A. Not currently, to the best of my knowledge. However,

2 I will absolutely make this away to be amended and

3 looked at. But you're right: the onus is on Post Office

4 to investigate any discrepancies, should the postmaster

5 wish us to.

6 Q. Over the page, please, page 4. There's more guidance,

7 it says at the top, "Guidance on disputing a discrepancy

8 or Transaction Correction". So "What happens at the end

9 of the investigation?", and the second paragraph:

10 "If a discrepancy amount has been investigated by

11 Post Office, or agreed by the Postmaster, and is found

12 to be a genuine loss to Post Office, the discrepancy

13 will be passed to the Postmaster Account Support Team to

14 support you through the options regarding settling the

15 amount."

16 Should that also say, "and is found to be a genuine

17 also to the Post Office and caused by your negligence,

18 carelessness or error"?

19 A. Perhaps, yes, as that would be more aligned to the

20 wording in our contracts.

21 Q. Do you know if this wording is being considered to be

22 changed as part of the review?

23 A. I don't think so but, again, very happy to take that

24 away and make sure it's implemented quickly.

25 Q. It might be said that this guidance isn't clear in the

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1 training because Post Office are seeking to downplay
 2 their investigative obligations or when the "Make good
 3 with cash" button should be used; what would you say to
 4 that?

5 **A.** I don't think that's true at all. I accept the fact
 6 that the wording could be better but Post Office, to the
 7 best of my knowledge and from my work with other teams,
 8 are absolutely not trying to downplay two fundamental
 9 issues here: the first of which is that it is upon Post
 10 Office to work with the postmasters, support them, in
 11 thoroughly investigating any discrepancies; and the
 12 second point, as you've mentioned, is we're very clear
 13 that postmasters should only put their hand in their
 14 purse and put money in the till if they are absolutely
 15 sure that it is a genuine mistake that's been made in
 16 branch, that they can recall. So I'm very clear on
 17 that.

18 **Q.** What we saw there in the Operational Training Guide,
 19 does that reflect what's taught in classrooms and on the
 20 various online resources?

21 **A.** The wording in that guide that you've just showed me,
 22 I'm sure would be consistent with the other materials
 23 used, you know, very -- the team do take steps to make
 24 sure that wording across all of our learning materials
 25 is consistent for good reason. So when I'm going back
 49

1 Office, not just the Training Team -- and you may have
 2 heard our People Director talk about that -- Chief
 3 People Officer -- Karen McEwan, last week -- we do have
 4 structured training in place now for all new starters,
 5 which involves, you know, understanding the Horizon
 6 issues of the past, the findings from the Common Issues
 7 Judgment, the Horizon Issues Judgment and, actually, you
 8 know, watching excerpts from this Inquiry to understand
 9 the previous issues that we had and the need to change,
 10 both culturally and operationally.

11 So specifically to the Trainers, they would have
 12 any -- any new people joining the team would have that
 13 level of training.

14 **Q.** Just pausing there, I'm not interested, really, in the
 15 new people --

16 **A.** Okay.

17 **Q.** -- it's the people who used to train before Common
 18 Issues?

19 **A.** So for existing Trainers, who might have been in post
 20 prior to Common Issues Judgment, they will have also
 21 gone through various modules to get an understanding of
 22 what happened in the past, what needs to change. They
 23 will also, of course, have been able to view our
 24 training policy, they have to look at our training
 25 policy, and we have records annually that they've looked
 51

1 and making some changes to those documents, I will need
 2 to look at the wider training collateral there, which
 3 will include classroom content too.

4 **Q.** Please can we look at page 36 of your statement,
 5 paragraph 83. You give a description there of how
 6 members of the Training Team are trained. You say
 7 they're trained internally. I don't need to read the
 8 rest of that out, it can be read.

9 How many of the trainers working now in the Training
 10 Team were in post as Trainers before the Common Issues
 11 Judgment?

12 **A.** I don't know that number off the top of my head, I'm
 13 afraid. There is quite a high churn rate in our
 14 Training Team, so a good proportion are, you know, over
 15 the last five or six years definitely but I can't say
 16 for sure.

17 **Q.** We've heard evidence of Post Office's previous view of
 18 the obligations on subpostmasters, in respect of
 19 settling discrepancies. What steps is Post Office
 20 taking to ensure that those who were giving training on
 21 the pre-Common Issues training course, they're not
 22 carrying over that institutional understanding of how
 23 the contract used to work into today's training
 24 programme?

25 **A.** Sure. Well, I think, for anybody working in Post
 50

1 at that and understood that and been trained out on it.

2 And, of course, our Trainers, as well, are all
 3 quality assured, they're observed on a regular basis by
 4 the leaders in the team to make sure that they are
 5 delivering in the very best possible way and to the
 6 standards that we expect.

7 So I'm confident that, if there were any -- anything
 8 being trained out that wasn't -- you know, was pre-CIJ
 9 and shouldn't be, in terms of approach to shortfalls,
 10 for example, that if that did happen, it would have been
 11 stamped out very quickly. I'm not aware of any examples
 12 of that, though.

13 **Q.** I should also clarify, sorry, I should have said my
 14 question wasn't aimed at new trainees, not that I'm not
 15 interested in it.

16 **A.** Thank you.

17 **Q.** Clearly, we are looking at that as well.

18 **A.** Apologies.

19 **Q.** My question wasn't aimed at that.

20 We don't need to bring it up but at page 42 of your
 21 statement, paragraph 100, you refer to a Feedback
 22 Committee being established in June 2024, to collate
 23 feedback received on training, analyse it for patterns
 24 and trends, and take any steps you deem necessary.

25 **A.** Yes.
 52

1 Q. What was done with feedback prior to June 2024?
 2 A. So I think, prior to June 2024, we received feedback
 3 from postmasters or people going on training at the
 4 various stages of the learning cycle. So we'd have
 5 feedback provided after e-learning had been completed
 6 online; feedback after attendance at classroom; feedback
 7 after an onsite Trainer had been out to support
 8 postmasters; and then feedback from new postmasters
 9 after the first few months of them being in operation;
 10 as well as getting feedback from those who use our
 11 materials on our Learning Management System, et cetera.

12 But I think it's fair to say that, within the
 13 respective teams, that data was being analysed and
 14 looked at, perhaps in a slightly siloed way, so what
 15 this has tried to do is bring all of those component
 16 parts together. So everybody responsible for all of
 17 those elements are meeting now regularly, looking at the
 18 data holistically and understanding what needs to be
 19 done in response to that feedback. It's very early
 20 days, the first one was only in June, but I think it's
 21 working well.

22 Q. Could we please bring up EXPG000007. This is the
 23 YouGov survey that was produced for the Inquiry. Have
 24 you had a chance to read this?

25 A. Yes, I have.

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1 parts of training we've consistently seen levels of plus
 2 90 per cent. So that's why I was very disappointed to
 3 see these results because there is quite a stark
 4 difference there.

5 Q. Is there any proposal to investigate the cause of the
 6 difference between the feedback you receive and the
 7 feedback that's been found in this YouGov survey?

8 A. I think with all of the statistics and feedback in this
 9 YouGov report overall, absolutely. You know, the
 10 business are, and I am, for my areas, looking at these
 11 results and understanding what more we need to do, given
 12 this feedback. I think it's very hard, obviously, when
 13 you don't know, quite rightly, who these postmasters are
 14 who have experienced this, but we take this very
 15 seriously and, if people feel like this, we need to do
 16 more.

17 Q. Thank you. That can come down.

18 I want to move on to a very brief point on branch
 19 assurance/audit.

20 SIR WYN WILLIAMS: While it's on my mind, there are two
 21 things that I'd like a bit more information about.

22 First of all, on surveying people's satisfaction, so
 23 to speak, with training, in effect, you were saying that
 24 your feedback to the Post Office directly reports much
 25 higher numbers of people who are satisfied with the

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1 Q. Can I ask to turn, please, to page 16, and if we could
 2 go to the table at the bottom, please. We have
 3 satisfaction responses in relation to the Horizon
 4 training by length of time working as a postmaster,
 5 which obviously will be relevant to the types of
 6 training it's engaged at. Looking at the "2 years or
 7 less" and the "3-5 years", the levels of satisfaction
 8 and dissatisfaction, is that consistent with the
 9 feedback Post Office had been receiving through its own
 10 feedback forms?

11 A. It's not and it was very disappointing to see these
 12 statistics, if I'm honest.

13 Q. I take it from you saying it was disappointing, your
 14 feedback you received directly from subpostmasters is
 15 better than what is shown here?

16 A. It is, it is much better than is shown here. A short
 17 while ago I just illustrated some of the feedback we get
 18 at the various stages of the postmaster lifecycle, after
 19 e-learning, after classroom, after onsite training and
 20 then post a branch going live, and of course that's for
 21 new postmasters coming in and their onboarding journey.

22 And at every one of those stages we ask the
 23 postmasters to rate how confident they are with
 24 progressing as one metric, and it's a score out of 10,
 25 a scale of 1 to 10, and across all of those component

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1 training they received.

2 In respect of your surveys, do a high proportion of
 3 the people undergoing the training actually provide
 4 feedback as well?

5 A. It varies depend on the stage, sir. It's a very good
 6 question. I believe that after classroom, for example,
 7 the feedback forms are provided to the delegates after
 8 the classroom. So, in person, if you like. So there's
 9 obviously a very good response rate there. For onsite
 10 Trainers and post-Go Live, I'd have to check the details
 11 but I think it's more on a voluntary basis, if you like,
 12 from the postmaster, so response rates might be fairly
 13 low there.

14 SIR WYN WILLIAMS: Yes, that's what's I'm struggling with
 15 and I'm making that admission openly, about the survey
 16 information I'm getting because, obviously, the
 17 percentage of people completing the YouGov survey is
 18 comparatively low, compared with the whole number of
 19 postmasters. So I wanted to know whether the same
 20 applied to your surveys or something different, if you
 21 see what I mean.

22 A. I see exactly what you mean, sir. It's a very good
 23 question and, you know, completion of surveys and
 24 response rates is something that plays on not just my
 25 mind but I'm sure many of my colleagues' minds. We

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1 would love to get more people responding to surveys
2 generally, across the organisation. Response rates
3 are -- aside from our annual postmaster survey that we
4 do which, you know, earlier on this year had over 1,900
5 responses, the surveys that we do within the respective
6 business units, on operational issues, they're quite low
7 and we'd love to encourage more feedback but, sadly,
8 that's not materialised yet.

9 **SIR WYN WILLIAMS:** Anyway, I think you've answered my
10 question in the sense that, if I summarise it in this
11 way: apart from those instances where people are
12 completing a survey following a classroom exercise, the
13 Post Office struggles to get a substantial number of its
14 cohort answering the surveys in a similar way to the
15 struggle that YouGov had to get people to respond; is
16 that fair?

17 **A.** That's fair, sir. Yes.

18 **SIR WYN WILLIAMS:** Okay. That was that.

19 Then I had just a point of detail. Could we go
20 back, please, to paragraph 47 of your statement. It's
21 WITN11610100. That's where you describe the training
22 that continues to be available, if I can put it in that
23 way, for subpostmasters.

24 **A.** Yes.

25 **SIR WYN WILLIAMS:** I wanted to focus on the subparagraph
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1 for anybody who wants to go along to have more training
2 to help them in their branch.

3 **SIR WYN WILLIAMS:** Right. That leads me to my second point
4 of detail. In respect of that specific half-day
5 classroom course on investigating discrepancies, do you
6 find that you've got more people who want to attend it
7 than you can supply, or what, or is there not very much
8 of a take-up from subpostmasters or postmasters; can you
9 give me some feel for that?

10 **A.** Sure. I don't think there's as much take-up as I would
11 like, sir, if I'm honest. I think over the last six
12 months or so, I think we've had around 200 delegates on
13 that particular course, although I'm not entirely sure
14 of my facts there. I think what I find, sir, is
15 a general lack of awareness, still, from postmasters and
16 their teams about what training is available to us and
17 that's one thing, again, that we're exploring at the
18 moment: how we can better advocate the range of training
19 materials that are out there, and get more postmasters
20 to take us up on them.

21 **SIR WYN WILLIAMS:** All right. Thank you very much.

22 Sorry, Mr Stevens, over to you again now.

23 **MR STEVENS:** Thank you, sir.

24 A brief point on branch assurance/audit. The
25 Inquiry has heard evidence about Post Office Auditors

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1 (d), "Investigating discrepancies", all right? Two
2 points I wanted clarification of: is investigating
3 discrepancies part of the mandatory training that people
4 who are newly joining as postmasters undergo, post-CIJ?

5 **A.** So, in part, yes, it is, sir. In the initial classroom
6 training, e-learning and onsite support, new postmasters
7 and their assistants, as well, in branch, will be taken
8 through ways in which they can help themselves in branch
9 with operational procedures to minimise discrepancies
10 and what steps to be taken, if there is a discrepancy,
11 to try to get to the bottom of it. So it is in there
12 across the various approaches.

13 **SIR WYN WILLIAMS:** Right. So I think you describe in detail
14 the -- what I'll call onboarding training from, I think,
15 paragraph 50 onwards of your statement. But, anyway,
16 there's a whole section on the training received right
17 at the start and I must have missed it because
18 I couldn't find in that specific reference to part of
19 the training being investigating discrepancies. But you
20 tell me that it is part of the training, yes?

21 **A.** It is part at various stages, there is a lot of material
22 and it is covered as part of our classroom and onsite
23 too. The investigating discrepancies half-day classroom
24 course is, you know, just by the length of time, more
25 detailed and is available not on a mandatory basis but

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1 logging onto branch terminals and making adjustments to
2 stamps without postmasters' knowledge. I just want to
3 explore one element of that with you. Please can we
4 bring up NFSP00001468. There's an email at the bottom
5 from Calum Greenhow to you on 10 May 2023, and it says:

6 "Tracy,

7 "It has come to my attention that [Post Office]
8 personnel are visiting postmasters, including audits
9 (Putney PO), where Area Managers/Auditors are entering
10 stock values onto Horizon without either consultation or
11 agreement with the postmaster."

12 It says:

13 "If these facts are correct, then the NFSP would
14 like to know who has authorised this policy within [Post
15 Office] and why it has not been discussed with the NFSP
16 in advance?"

17 It goes on to set out some various other matters.

18 Firstly, were you involved in investigating this
19 issue following this email?

20 **A.** I wasn't specifically involved in investigating the
21 issue. The reason I got the email is because, at the
22 time, I was accountable for the relationship with the
23 NFSP but the issue was investigated, yes.

24 **Q.** Do you know what happened as a result of that
25 investigation?

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1 **A.** I do. So, as a result of the investigation, I believe
2 Post Office held its hands up and said, "Absolutely,
3 this shouldn't be happening" and, as a result of that,
4 that practice has absolutely stopped now in branches.
5 There was a follow-up call with Mr Greenhow and,
6 I think, Keith Richards from the NFSP as well, a short
7 time after this, to update them on the outcome of our
8 investigation and assure them that that wasn't now
9 happening.

10 **Q.** Are you aware of how this practice began or whether
11 there was a policy in place?

12 **A.** I'm not, I'm afraid. I mean, I've never had any
13 accountability for the Branch Assurance Team and it's
14 certainly not something that's in our postmaster policy.

15 **Q.** That can come down. Thank you.

16 I want to turn to suspension, reinstatement and
17 termination. You've given figures in your witness
18 statement, which I'll turn to in a moment, about the
19 number of branches -- I think it's number of branches
20 rather than subpostmasters -- where there has been
21 a termination, suspension or reinstatement since
22 financial year 2017.

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

24 **Q.** You say that Post Office doesn't hold a central record
25 of that data, so it's likely that the record or the

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1 **A.** Yes, the way it is written in here, yes. It should be
2 before, prior -- prior to that year.

3 **Q.** So we can be confident, can we, that if we turn the page
4 to page 61, the figures given here are --

5 **A.** The figures of the numbers of them are accurate to the
6 best of my knowledge, absolutely.

7 **Q.** But in the brackets, where there are asterisks?

8 **A.** Yes.

9 **Q.** Sorry, I should say brackets relate to where Horizon
10 data was used or thought to be used?

11 **A.** Exactly.

12 **Q.** Where there are asterisks, that's been done on, as
13 I understand it, a look-back review of available data
14 and that's the best estimation of a case that's based on
15 Horizon data?

16 **A.** Correct.

17 **Q.** Could you expand on what you mean by where the
18 suspension, reinstatement or termination was based on
19 Horizon data?

20 **A.** Yes. So if suspensions or terminations were based on --
21 as a result of discrepancies or shortfalls occurring in
22 branch, ultimately, that would be what I'm referring to
23 here as "based on Horizon data".

24 **Q.** So we see financial year 2019/2020, Common Issues
25 Judgment would have just been handed down at the start.

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1 information you provided is incomplete.

2 **A.** For prior to '17/'18 financial year I think, yes.

3 **Q.** But post-'17, is that --

4 **A.** I'd just have to get up the relevant part of my witness
5 statement, if I can.

6 **Q.** Page 60, paragraph 143, please. You say:

7 "For financial years 2017/18 and 2018/19, Post
8 Office did not keep records that identified whether the
9 SRT was based on Horizon data."

10 So that's in relation to --

11 **A.** Correct.

12 **Q.** -- 2017 and '18. If we go to paragraph 140, please, you
13 say:

14 "Post Office does not hold a complete record of
15 historical data in relation to postmaster suspensions,
16 reinstatements or terminations. Prior to financial year
17 2017/18, the Contracts Team was managed as two separate
18 teams ... with each team holding their own data. It may
19 be possible that some additional data from pre-2017
20 exists that could be derived from a manual review of
21 individual branch files."

22 So that first sentence, "Post Office does not hold
23 a complete record of historical data in relation to
24 postmaster suspensions", et cetera, is that aimed at
25 years before the financial year 2017/18?

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1 **A.** Yes.

2 **Q.** December 2019, you have Horizon Issues Judgment, and we
3 see there there's a drop in cases of both suspensions
4 and terminations. Are you able to say if the drop is
5 because of the judgments in the Group Litigation or
6 something else?

7 **A.** I think that the drop in those cases, and over
8 subsequent years, is as a result of the findings from
9 the Common Issues Judgment/Horizon Issues Judgment, but
10 as well as Post Office introducing its policies, which
11 we've talked about previously, which I think provide
12 greater clarity on the circumstances in which suspension
13 or ultimately termination should be enacted.

14 **Q.** We see that, in the subsequent years, and noting that
15 the 2024/25 year is only to 24 June, there are still
16 contract suspensions and terminations based on Horizon
17 data?

18 **A.** Correct.

19 **Q.** What is Post Office's basis for terminating contracts
20 using data generated by the Horizon IT system?

21 **A.** So we will -- our Contracts team will take a decision to
22 suspended or terminate someone's contract. If
23 discrepancies are involved, which is the use of Horizon
24 data, then we would obviously only be suspending or
25 ultimately terminating contracts once a very thorough

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1 investigation has happened into that discrepancy. The
2 teams in our central operations function, which are
3 managed by Mel Park, undertake those investigations into
4 discrepancies, and I am assured that -- and we've heard
5 a lot about Horizon data and the integrity of Horizon
6 data.

7 As part of their investigations, they will obviously
8 be looking to make sure and check whether Horizon could
9 be at play, looking at any known errors, for example,
10 but only when that determination has happened and we're
11 sure that the discrepancy is as a result of the
12 negligence, carelessness or error of a postmaster, would
13 we possibly enact a suspension or termination.

14 **Q.** One thing we'll come to with a different witness is Post
15 Office's position is it's not pursuing civil claims for
16 discrepancies based on Horizon data --

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

18 **Q.** -- and Post Office's position is it only seeks repayment
19 without going to civil enforcement where the postmaster
20 agrees to pay?

21 **A.** Correct.

22 **Q.** In these cases, where we see terminations or
23 suspensions, can you assist with, on the bracketed
24 numbers, whether, within those groups, the postmaster
25 disputed the discrepancy or suggested that Horizon was

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1 situations where a postmaster resigns?

2 **A.** That's correct.

3 **Q.** That can come down. Thank you.

4 The decision on suspension and termination is taken
5 by Contract Advisers; do they report to you?

6 **A.** No. The Contract Advisers report to their Head of
7 Contract Performance and Deployment, and they report in
8 to me.

9 **Q.** You say in paragraph -- we don't need to turn it up --
10 150 of your statement that the Contract Advisers used to
11 sit under the Branch Assurance Team?

12 **A.** The Contract Advisers used to sit within the same
13 function as the Branch Assurance Team, yes.

14 **Q.** That's been changed recently, has it?

15 **A.** It was changed in August last year.

16 **Q.** Why was that?

17 **A.** Following a review of our procedures and processes by
18 Group Assurance, who are looking at, you know, how we
19 have delivered improvements following the Common Issues
20 Judgment, they identified a potential conflict with the
21 Branch Assurance Team sitting in the same time as the
22 Contracts team and, hence, the decision was taken to
23 move the Contracts team under me.

24 **Q.** Please can we look at page 64 of your statement,
25 paragraph 154. You refer to the four current Contract

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1 at fault?

2 **A.** I'm not entirely sure whether, in each of these cases,
3 the link to discrepancies, the postmaster would have
4 disputed it or would have claimed that Horizon was at
5 fault. What I can say, of course, is that each of them
6 would have been investigated very thoroughly. Where we
7 suspend a postmaster or terminate their contract, what
8 we're not doing is suspending or terminating on the
9 basis of them having discrepancies. We are suspending
10 or terminating based on the fact that there have been
11 contract performance issues.

12 So, to give you an example, in the majority of our
13 cases, there are discrepancies that will have been
14 caused by operational procedures in branch not perhaps
15 being followed. Too much excess cash is a key one.
16 Failure to rem in cash and stock, for example, or not
17 undertaking daily cash declarations or your monthly
18 balancing, which have all led up to the accumulation of
19 discrepancies.

20 But I'm confident that the discrepancies are
21 investigated thoroughly.

22 **Q.** Just on these numbers finally, I read this as the
23 contract is terminated, in that the Post Office itself
24 is making the decision to terminate the contract. Am
25 I right in reading this that it doesn't include

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1 Advisers.

2 One joined Post Office in 2005. Area Manager for
3 nine years, now acting as a Contract Adviser.

4 2012, another joined then, (b), worked in various
5 roles in the business, now a Contract Adviser.

6 If you go down, please, (c), another joined 1981,
7 started in the role of Contract Adviser in 2006.

8 (d), the fourth, is more recent.

9 If you then go down please, 155. We see the Head of
10 Contract Management and Deployment, employed by the Post
11 Office since 2003, took a role of Contract Adviser in
12 2011.

13 The Inquiry has heard evidence about during the
14 period -- we're looking at 2000 to 2012 and
15 thereafter -- where the process for termination has been
16 criticised, in particular that there was an expectation
17 to respond to discrepancies robustly in the appeal
18 process and the decision process. What steps has Post
19 Office taken to ensure that the Contract Advisers who
20 were involved in those decisions have learnt from those
21 criticisms that have been made?

22 **A.** So I think I touched on some of this when we were
23 talking about our Training Team, as well, and people who
24 were in post prior to the Common Issues Judgment.

25 The -- all of the Contract Advisers, whether they were

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1 in the business or since they've come in since, have all
2 had training, quite structured training, delivered on
3 the implications of the Horizon IT Inquiry, the findings
4 from the Common Issues Judgment.

5 They've also had clearly training on the new terms
6 that have been added to the contracts as well, the
7 implied terms, which clearly do give a focus on our
8 approach to suspensions and terminations and it gives
9 a focus as well on the management of discrepancies and
10 how we will support postmasters more.

11 So they have all had training on the implications
12 and, again, they will have reviewed the policies
13 associated with their role on an annual basis to make
14 sure that they're doing their job in line with those
15 policies and procedures.

16 **Q.** I want to look shortly at some of the review mechanisms
17 that are in place as well but can I look at suspensions
18 in a bit more detail briefly. It's POL00448254. So
19 this is the Postmaster Support Policy on contract
20 suspension.

21 **A.** Yes.

22 **Q.** If we can turn, please, to page 17, down to the bottom
23 of the page, it says:

24 "Suspension will only be applied where absolutely
25 necessary to review the cause of a potential contractual
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1 who then makes the final decision. That decision is
2 then reviewed at the next Postmaster Suspension Decision
3 Governance Committee meeting."

4 You set out the membership of that meeting there.

5 Why are there no either former postmasters or NFSP
6 representatives on that panel?

7 **A.** It's a very good question and something that we're
8 looking to address because the other panel, the
9 Termination Committee and the Decision Review Committee,
10 do now have postmasters or postmaster representatives on
11 those panels. I'd be very keen to have a postmaster
12 representative on this panel; and it's something that we
13 are looking at.

14 **Q.** So that's something you're currently --

15 **A.** Currently looking at, yes.

16 **Q.** Is it in consultation with the NFSP over that matter?

17 **A.** It will absolutely need to be in consultation with the
18 NFSP, and the NFSP do input to and approve all of our
19 policies, actually, before they go to our Audit and Risk
20 Committee.

21 **Q.** At paragraph 177, just below, you say:

22 "To date, no decision has been overturned by the
23 Postmaster Suspension Decision Governance Committee."

24 Do you think that's a good or a bad thing?

25 **A.** I think it's a good thing because I think it genuinely
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1 breach identified by the Contract Adviser and where all
2 alternative options have been considered."

3 Is that the test that is to be applied, then, by
4 Contract Advisers when considering whether or not to
5 suspend a postmaster?

6 **A.** Yes, and they are absolutely trained and given
7 instruction that suspension should be the last resort
8 and only when, you know, issues aren't capable of being
9 remedied.

10 **Q.** We've heard a lot of evidence about some policies being
11 under review. Is that test being considered for review
12 or change or is that a settled test?

13 **A.** I think we're always up to getting feedback and changing
14 things if we need to. These are reviewed on a very
15 regular basis and are reviewed by RCC and ARC, our two
16 governance forums. So at the moment that is the
17 position, that suspension is absolutely the last resort.

18 **Q.** I appreciate that these things are reviewed but is there
19 any indication that that test will be lowered or
20 weakened in future?

21 **A.** No. Not in my view.

22 **Q.** Could we please look at your statement, page 72,
23 paragraph 176. You say that:

24 "The Contract Adviser can make a recommendation to
25 the Head of Contract ... and Deployment on suspension,
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1 shows that we have followed the processes and procedures
2 and been fair and transparent to postmasters when making
3 suspension decisions.

4 **Q.** It might be said that it shows that the Governance
5 Committee is not properly overseeing it and challenging
6 the decisions that were made; what would you say to
7 that?

8 **A.** It could show that. I don't think that's the case.
9 I think the members of the Suspension Decision
10 Governance Committee have all had training, they've all
11 had training on the contracts, they've all had training
12 on the CIJ judgment handed down, and I'm confident in
13 the decisions that they are making, and we've got some
14 good representatives there from across the business.

15 **Q.** Has there ever been consideration for any independent
16 review or input to ensure that the Decision Governance
17 Committee is doing its job properly?

18 **A.** So the Decision Governance Committee, as with our other
19 committees, have been looked at by our group assurance
20 function, who are reviewing much of what we do across
21 the Retail function. I believe that they think it's fit
22 for purpose at the moment, as there have been other
23 conversations more generally, not just about Suspension
24 Decision Governance Committees, around the possible use
25 of independent external organisations to further assure
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1 our work. So that, again, is something that's ongoing.

2 **SIR WYN WILLIAMS:** What sort of numbers are we talking about

3 to get to the Governance Committee, of the people who

4 are suspended? Roughly at least, can you tell me how

5 many take the decision to the Committee?

6 **A.** So this Committee here, sir, is our internal Suspension

7 Decision Committee and every suspension decision, every

8 one of them, is ratified by this committee.

9 **SIR WYN WILLIAMS:** Right. I'm sorry, I misunderstood that.

10 Fine.

11 **A.** Thank you, sir.

12 **MR STEVENS:** Can we please look at POL00448206. This is the

13 equivalent support policy but for contract termination.

14 Could we please look at page 18, if we go down to

15 "Repudiatory breach", please. So we have examples here

16 of a repudiatory breach and we see in the middle:

17 "Where discrepancies of a significant value have

18 been caused by the negligence, carelessness or error of

19 the postmaster, resulting in a loss to Post Office, and

20 which have been fully investigated by Post Office ..."

21 Firstly, what is significant value in this context?

22 **A.** I don't think we actually have a definition of what

23 a significant value is. We're certainly talking here

24 about values over -- you know, certainly over £10,000/
 25 £20,000, I would have thought, but we don't have

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1 **A.** I do not.

2 **Q.** Actually, sorry, can we move to page 20, please, 4.11.

3 It says:

4 "Post Office will need to consider whether different

5 has complied with its own contractual duties in relation

6 to matters relevant to the reason for termination."

7 It goes on to say:

8 "If Post Office has materially failed to comply with

9 its own contractual duties in relation to the matters

10 relevant to the reason for termination, it is not

11 entitled to terminate on notice."

12 Are Contract Advisers giving any legal assistance to

13 determine whether Post Office has materially failed to

14 comply with its own contractual duties?

15 **A.** Yes, they are. So the important point here is that the

16 Contract Advisers are not lawyers, they're not legal

17 experts, so any proposed decision to terminate

18 a postmaster's contract, we would have external legal

19 assurance on that decision. Only when that assurance

20 has been given to us and that we've acted in line with

21 the terms of the CIJ, we've acted, you know, under our

22 duty of good faith, not arbitrarily, irrationally,

23 capriciously, et cetera, would we then take that

24 decision to the Termination Decision Governance

25 Committee, for final ratification.

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1 a definition of a significant value.

2 **Q.** But is it still the case, then, that it appears that, if

3 there are discrepancies of a significant value, that the

4 Post Office considers was caused by negligence,

5 carelessness or error of the postmaster, that is in and

6 of itself a ground for terminating the contract?

7 **A.** That, in itself, is grounds for terminating the

8 contract. But I would add that, of course, before we

9 get to that point, those discrepancies, whatever their

10 value, would have been thoroughly investigated, using

11 the process I've described earlier, before we settled on

12 the fact that they were caused by negligence,

13 carelessness or error.

14 **Q.** In paragraph 163 of your statement -- we don't need to

15 turn it up -- you say:

16 "Contract Advisers do not investigate branch

17 discrepancies or deal with the recovery of outstanding

18 branch accounts."

19 Is it the case that they rely on another team in

20 Post Office to do that for them?

21 **A.** That's correct.

22 **Q.** Which team is that?

23 **A.** So that would be the Central Operations Team and the

24 Postmaster Account Support Team.

25 **Q.** You don't oversee that?

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1 **Q.** That can come down. Thank you.

2 If a decision to terminate has been made, there's

3 then the Postmaster Contract Termination Decisions

4 Committee. Can you explain what the role of that

5 Committee is?

6 **A.** Yes. So we've got the -- if a termination decision has

7 been proposed by the Head of Contract Management and

8 Deployment, we've got the external legal assurance

9 advice, we then go to that committee, who, very much

10 like the Suspension Committee that we talked about

11 earlier, is senior leaders within the organisation,

12 ultimately, with some legal input too, to review the

13 rationale document, review the legal advice, and

14 ultimately ensure that the teams have been working in

15 line with its contract, it's policies and its

16 procedures.

17 **Q.** If we look at POL00448205, page 14, please.

18 **A.** Apologies, can I ask for some clarity here?

19 **Q.** Yes.

20 **A.** We've just talked about the Termination Decision

21 Governance Committee, which is the internal committee,

22 and this document is now a separate review panel.

23 **Q.** Is this the panel?

24 **A.** This is the panel if a postmaster chooses to appeal

25 a suspension or termination.

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1 Q. So is that called the Postmaster Contract Termination
 2 Decisions Panel?
 3 A. This is the Postmaster Decision Review Panel.
 4 Q. Review Panel?
 5 A. Yes, apologies.
 6 Q. So this is a separate body that's dealt with for
 7 appeals?
 8 A. Yes.
 9 Q. This the body that comprised of -- we see two Senior
 10 Leadership Group members, one former postmaster and one
 11 non-voting panel chair --
 12 A. Correct.
 13 Q. Why is the panel chair non-voting, so there's a majority
 14 in favour of the Senior Leadership Group?
 15 A. That's a very good question, I think that the initial
 16 thoughts around the panel chair not being -- voting is
 17 so that they can more effectively provide independence
 18 and effectively chair the meeting. That's the case for
 19 a lot of our decision committees, that the Chair would
 20 be a non-voting member.
 21 Looking at this again now, that does clearly skew,
 22 slightly, the postmasters versus senior leaders piece,
 23 so I think, again, that's something that we should
 24 absolutely look at.
 25 Q. In looking at something like that, would you liaise with

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1 the *Bates* programme but never a discussion to cancel.
 2 However, Tracy Marshall confirmed that there had been
 3 discussion about cancelling the survey and that she and
 4 others from within the team had pushed to ensure it went
 5 ahead -- which ultimately it did."
 6 Can you provide some background to: (1) the
 7 discussions on cancelling the survey; and why it was
 8 continued?
 9 A. So this is in relation to -- normally, we do an annual
 10 postmaster survey which tends to happen January/February
 11 time of each year, and we've done that since 2021.
 12 Following the *Mr Bates vs The Post Office* programme in
 13 January of this year, clearly there was lots of external
 14 media attention, lots of, quite rightly, focus on the
 15 Post Office and the awful impact that the Horizon
 16 scandal has had on many postmasters.
 17 There were, therefore, some discussions around the
 18 timing of the postmaster survey, which could have
 19 resulted in perhaps more negative feelings being given
 20 in that survey.
 21 This is a survey, sir, where we're talking about
 22 general postmaster sentiment.
 23 So there were some discussions. I don't think this
 24 is quite a true reflection of my conversation and my
 25 interview here. I don't recall there being a discussion

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1 the NFSP?
 2 A. Absolutely. Again, this is something integral to our
 3 policy.
 4 Q. Thank you. That can come down.
 5 You mentioned earlier a review about I think
 6 considering whether independent input into these
 7 decisions or reviewing them is being considered. When
 8 will that review be complete or when will there be
 9 proposals available?
 10 A. I don't think I have any concrete dates on that but it
 11 is an outstanding action that we have following feedback
 12 from group assurance, so we will need to work on that
 13 quickly. I would very much hope to have an updated view
 14 within this financial year.
 15 MR STEVENS: Sir, unless you have any questions on
 16 termination, I'm going to move to a different topic.
 17 SIR WYN WILLIAMS: That's fine, then, Mr Stevens.
 18 MR STEVENS: The last topic I have, it's very brief. Can we
 19 look at POL00460000, please. This is an investigation
 20 report on Project Pineapple. I don't need to go through
 21 all of it but can you turn to page 10, please.
 22 In the middle, it says:
 23 "Martin denied that there was consideration of
 24 cancelling the [postmaster] survey. He said there had
 25 been nervousness in the Executive discussions because of

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1 about cancelling, full stop, the survey, but there was
 2 certainly a discussion around potentially just
 3 postponing it by a month or so, before it went ahead.
 4 The survey did take place this year and I think it was
 5 March time it went ahead.
 6 MR STEVENS: Thank you.
 7 Sir, those are all the questions I have. Unless you
 8 have any questions now, I'll check if there are
 9 questions from the Core Participants.
 10 SIR WYN WILLIAMS: Check with the Core Participants, please.
 11 MR STEVENS: Yes, there's two sets of questions, sir.
 12 I don't know who wants to go first. I think Ms Page
 13 first.
 14 SIR WYN WILLIAMS: Fine.

Questioned by MS PAGE

16 MS PAGE: Ms Marshall, hello.
 17 A. Hi.
 18 Q. Have you downplayed your involvement in disputes with
 19 postmasters over the years?
 20 A. I really don't think I have, and I still maintain my
 21 position that, whilst on the face of it, it looks as
 22 though I've -- and I have sent emails which do talk
 23 about remote access, for example, I was very much
 24 passing on information from Subject Matter Experts to my
 25 bosses at the time. I've never had any involvement with

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1 IT, with prosecutions, with investigations, over my
 2 career history. But I do want to say I'm very sorry
 3 that it gives that opinion of me and want to assure
 4 everybody that that is absolutely not the case.

5 **Q.** Let's have another look at a different section of your
 6 email to Ms van den Bogerd and Mr Gilliland. It's
 7 POL00294728 and, as it comes up, you'll appreciate now,
 8 if not, you say, at the time, that this related to
 9 a dispute with the Ferndown branch. The postmaster and
 10 her husband were saying that there were integrity
 11 problems with Horizon; you appreciate that now, do you?

12 **A.** I appreciate that now, yes.

13 **Q.** If we could scroll down to the bit that wasn't read out,
 14 it's got the heading "Independent review of Horizon
 15 system integrity":
 16 "Post Office Limited has allowed an independent
 17 review of our Horizon system in the past, on one
 18 occasion."
 19 Then it refers to that occasion. It was to do with
 20 the trial of Mrs Misra. It says this about the trial:
 21 "The case made it to court on 11 November and after
 22 reviewing all the evidence the judge exonerated Post
 23 Office Limited in full, finding the Horizon system to be
 24 robust."
 25 That appears to be in bold; do you see that?

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1 the issues around Horizon system remote access would
 2 have come from Dave Hulbert and Andy McLean.

3 I don't think they would have been in a position, as
 4 IT people, to talk length about the particular case of
 5 Mrs Misra, here.

6 **Q.** So where did you get that information from?

7 **A.** Well, I can't remember who I would have gone to, but
 8 that wouldn't have been something that I would have
 9 known about or been involved in, so I would have been
 10 relying on, I'm guessing, some of my legal colleagues at
 11 the time, to provide me with that information. It was
 12 not something I was ever involved in.

13 **Q.** Given that the trusted subpostmaster at Ferndown had
 14 raised the issue of Horizon integrity, why do you think
 15 it was that you and apparently Ms van den Bogerd and
 16 Mr Gilliland, were prepared to take these assertions
 17 from you, relayed via others, from various unknown
 18 people, rather than considering what the subpostmaster
 19 and her husband were saying?

20 **A.** I honestly can't comment on why Angela and Kevin, who
 21 I think attended the Ferndown meeting, they didn't talk
 22 about any of the information that I relayed, I don't
 23 think. Hindsight's a wonderful thing, isn't it? They
 24 should have been a little bit more upfront, I think, at
 25 that meeting and asked for the perspective of the

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1 **A.** I do.

2 **Q.** "During the course of the independent review, the
 3 defence legal team were provided with representatives
 4 from Fujitsu and the knowledge and experience of using
 5 the Horizon system. Fujitsu experts helped the defence
 6 team complete their investigation."
 7 "The jury in the case of Misra v Post Office Limited
 8 voted unanimously that she was guilty and as such, she
 9 is now serving time in prison. This has been a high
 10 profile case due to the fact that Mrs Misra is pregnant.
 11 Mr Misra has made allegations that the defence team were
 12 not allowed access to all the information they required
 13 regarding the Horizon system but the judge made no such
 14 accusation."
 15 If we could just go a little further down, as well.
 16 The final paragraph on the page:
 17 "In addition to the independent review above, the
 18 robustness of the Horizon system is audited on an annual
 19 basis by Ernst & Young. Never before has the quality
 20 and accuracy of the system been doubted here."
 21 Now, it appears that all of that information came
 22 from conversations that you'd had with Dave Hulbert and
 23 Andy McLean the day before; is that right?

24 **A.** I think the conversations with -- in this email, because
 25 I don't remember it but having read it -- that certainly

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1 postmaster.

2 I think at the time, here, in 2010/11, the business
 3 position was incorrectly and wrongly that Horizon was
 4 very much a robust system.

5 **Q.** Was it part of the culture that, when there was a one
 6 word versus another word, a subpostmaster versus someone
 7 else, the someone else was always believed and the
 8 subpostmaster was not; part of the culture of believing
 9 that postmasters were incompetent or dishonest, not
 10 worthy of belief?

11 **A.** I don't recognise that in the roles that I was doing, in
 12 so far as feeling as though postmasters were incompetent
 13 and shouldn't be relied on and that Post Office were
 14 always right. I don't recognise that in the jobs that
 15 I was doing and, in fact, of course, at the time here,
 16 my job involved a lot of involvement with the NFSP and
 17 hearing firsthand about the issues affecting
 18 postmasters. Whether others had that view, I can't say,
 19 but it was not something that I experienced.

20 **Q.** Were others like Mr Gilliland and Mr Tuthill coming to
 21 you for this sort of activity, which you say wasn't part
 22 of your role, because you were willing?

23 **A.** No, I don't think so. I wasn't willing. I don't think
 24 I was complicit in any of this at all. I think they
 25 were coming to me, particularly Mr Gilliland, being my

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1 boss -- as I've said, he did so on numerous occasions --
2 asking me to go outside the remit of my role to find out
3 information for him to, you know, assist him in visiting
4 branches or whatever that might have been.

5 **Q.** Evidently, as a result of what you were told by unknown
6 persons, you must have believed that Mrs Misra was
7 guilty of theft at the time?

8 **A.** I would have taken on face value, from what my
9 colleagues had told me. I assume so, yes. Clearly
10 now --

11 **Q.** Do you accept that you were wrong about that?

12 **A.** Absolutely.

13 **Q.** When did come to accept that you were wrong?

14 **A.** I think there was a widely held position in Post Office,
15 until the handing down of the various judgments, that
16 Post Office were not at fault and that was a message
17 that was given consistently in our communications.

18 **Q.** Can you pinpoint a time when you recognised that
19 postmasters had been wrongly convicted?

20 **A.** On the handing down of the Common Issues and Horizon
21 Issues Judgments, yes absolutely.

22 **Q.** Would you say that was about convictions? Can I just
23 press you on that because, of course, there was
24 a subsequent judgment about convictions. Did you
25 connect it with convictions when the Common Issues

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1 experts in the business had provided me with. I don't
2 think I've ever been spreading lies or myths in the
3 business.

4 **Q.** Do you have anything to say about your failure to raise
5 your knowledge based on these email chains over the many
6 years where Post Office was claiming not to have any
7 remote access into branch accounts?

8 **A.** So whilst I still absolutely maintain that I wasn't
9 involved in the particular issues here and I'm, you
10 know, getting the information from other people, I am
11 incredibly sorry that I sent any emails with any
12 relevance whatsoever to remote access or convictions and
13 I am hugely sorry for any -- for the horrific things
14 that postmasters and their families and children and
15 communities have gone through over the last few years.

16 **Q.** Can I bring up, please, POL00416991, and this dates from
17 2011. If we just note that this is an email from Nigel
18 Allen to Andrew Winn with you on copy. If we go to the
19 first three paragraphs -- before we do that, the subject
20 "Ferndown ... Loss settled by [cheque] -- SPMR dispute":

21 "Thanks for this.

22 "I have discussed this with Tracy Marshall and she
23 has asked whether you can draft a letter to Mrs Rachel
24 Athwal, SPMR, explaining in as simple terms as possible
25 what happened and why it is now necessary for her to

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1 Judgment and the Horizon Issues Judgment came out?

2 **A.** I don't think I would have done, no.

3 **Q.** So when do you think you did recognise that convictions
4 were wrongful?

5 **A.** I can't pinpoint it specifically. I mean, clearly since
6 the Inquiry has been going on now for some years, and
7 I have, you know, read and heard a lot of the horrific
8 stories experienced by postmasters, I have now become
9 very clear that those convictions were wrong but I'm
10 sorry, I can't pinpoint specifically when I would have
11 been aware of that.

12 **Q.** Is it possibly not until *Bates vs The Post Office*?

13 **A.** It was absolutely before then.

14 **Q.** Just returning back in time, if I may briefly. The
15 email that you sent to Mr Gilliland and Ms van den
16 Bogerd was part of the myth making in Post Office, we've
17 seen a lot of it, using sort of wisps of truth and
18 spinning them to support what was of the falsehood that
19 Horizon was robust. Whether you were relying on others
20 or not, you were part of that, part of that myth making,
21 that chain of lies and fabrications. When did you
22 personally stop spreading those sorts of myths?

23 **A.** I can't think of other occasions when I have spread
24 those myths or lies. In this particular instance,
25 I was, as you said, very heavily relying on what other

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1 send us another cheque. Mrs Athwal is arguing that she
2 did what the helpline told her to do and as she has
3 already settled the shortage by cheque which has cleared
4 from her bank account, doesn't see now why she should
5 send another one despite the surplus in the branch."

6 Then this:

7 "Mrs Athwal and her husband have already challenged
8 the integrity of the Horizon system so it needs to be
9 explained that she has not been disadvantaged by any
10 software problems and that POL took the necessary steps
11 to rectify this as soon as possible.

12 "In view of the sensitive situation at this branch,
13 could you please send the letter to Tracy first and cc
14 to me."

15 So you weren't just investigating to help
16 Mr Gilliland with his interview. You were involved in
17 how to resolve the dispute, weren't you?

18 **A.** It would appear that from this letter, yes, but that was
19 not part of my role at all at the time. Although, yes,
20 that's what it looks like from this email.

21 **Q.** What this email tells us is that you were well aware
22 that the dispute involved the integrity of Horizon and
23 that it was seen as important to assert that the branch
24 had not been disadvantaged by a "software problem". You
25 understood, presumably, what this was about. This was

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1 about the need to keep the edifice up so that SPMS and
 2 clients didn't lose confidence in the Horizon system.
 3 You must have understood that, mustn't you?
 4 **A.** As I've said, I should have understood that. I don't
 5 know whether I did understand that at the time. It
 6 wasn't something that was in my remit. But, yes, I'm --
 7 what I'm certainly doing is maintaining the business
 8 position here, that the issue with Horizon integrity
 9 should not be challenged, which, as I've said, was
 10 a position that was maintained for a long time,
 11 incorrectly, in Post Office.
 12 **Q.** You were sufficiently worried about the sensitivities
 13 that you wanted to review the letter before it went out?
 14 **A.** Well, that's very unlike me in that role to have to do
 15 that, I have to say.
 16 **SIR WYN WILLIAMS:** Just a minute. Do we know that, Ms Page?
 17 This is a letter from Mr Allen, who is suggesting that
 18 it be sent to Ms Marshall. We don't, actually -- or
 19 I don't at the moment at least -- know whether it did go
 20 to her, what she did about it, et cetera.
 21 **MS PAGE:** This is the only email that I have about that,
 22 sir.
 23 **SIR WYN WILLIAMS:** Well, I think we ought to be careful
 24 about making five from one and one, if you see what
 25 I mean.

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1 "There is no evidence that the Horizon system does
 2 not work as it should. This is the finding of
 3 independent investigators. It has been shown to be
 4 robust and effective in dealing with six million
 5 transactions", et cetera.
 6 So those were key messages sent to you amongst many
 7 other people in 2015 and this was, essentially, a script
 8 for fending off concerns about Horizon, would you accept
 9 that?
 10 **A.** I think it was a script for us to cascade to the wider
 11 teams, from what I can make of the email, to use, if
 12 approached by the media, if approached and asked
 13 questions by postmasters, yes, it has to be that.
 14 **Q.** How many times do you think you would have adhered to
 15 that sort of a script when dealing with concerns about
 16 Horizon?
 17 **A.** Probably -- it's hard to say. I don't remember how many
 18 times I had those conversations. I certainly never
 19 spoke to the media about it. At the time of this --
 20 sorry, is it 2015, did you say?
 21 **Q.** Yes.
 22 **A.** At 2015, or from 2012 through -- well, all the way
 23 through to my current position, I've been working on
 24 programmes -- I was on the Network Transformation
 25 Programme at this point, so I wouldn't have been

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1 **MS PAGE:** Certainly.
 2 If we can move forward in time to 2015 and, if we
 3 could bring up, please, POL00117439. This first page
 4 makes it quite plain that there are a very large number
 5 of people on copy and, hopefully, you'll take it from me
 6 that you're one of them. Indeed, you may be on page 2,
 7 which I'll ask to scroll to now. Yes, there you are
 8 actually towards the end of the long list.
 9 This comes from Mark Davies, and he says:
 10 "Thanks for taking part in the conference call on
 11 Horizon this week."
 12 He then forwards a note and we can perhaps just have
 13 a look at a little bit of the content of that note. If
 14 we go down to page 3, we can see reference there to the
 15 BBC Panorama programme, which is maybe going to go out.
 16 We can also see that there's reference to
 17 a Parliamentary debate about the issue, ie the Horizon
 18 issue, and the talk about the fact that this may lead to
 19 further media coverage.
 20 If we could go down to page 4, please. We can see
 21 that he's set out various key points and messaging and,
 22 if we could go to a little further down -- sorry, just
 23 a little further up from there -- there's the paragraph,
 24 second bullet point down, which has the sort of classic
 25 line, if you like:

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1 interfacing actually directly with postmasters or the
 2 media. So I don't know how often I would have used it
 3 but it wouldn't have been frequently.
 4 **Q.** I won't take you to it, to save time but we can also see
 5 that in 2019, reference POL00268061, you were again part
 6 of a group Mark Davies copied in following the Common
 7 Issues Judgment and how to handle the media fallout from
 8 that. There was a summary of the Common Issues Judgment
 9 attached and some tips on how to handle the media.
 10 Do you remember receiving the Common Issues
 11 Judgment, the summary of it?
 12 **A.** Do you mean the media summary, the tips, as you call it?
 13 **Q.** Yes. Let me put it in a different way. When did you
 14 first appreciate what was said in the Common Issues
 15 Judgment?
 16 **A.** I only when it was -- probably after it was handed down.
 17 I think when it was handed down, there was certainly
 18 shock across the Post Office that that was the outcome.
 19 **Q.** Can you tell us about your own personal reaction,
 20 please?
 21 **SIR WYN WILLIAMS:** Well, Ms Page, I'm sorry to sound
 22 difficult but I'm not sure that this is actually going
 23 to help me in terms of what I have to really decide on
 24 my terms of reference. I mean, it's clear, is it not,
 25 from everything that I've heard already, that everybody

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1 in the Post Office expected to win but they lost, so
 2 then they had to come to terms with it.
 3 **MS PAGE:** What I'm trying to get at, sir, and I hope that it
 4 won't take very long and that it, I would suggest, is
 5 relevant to this phase, is when did it really dawn on
 6 Ms Marshall that Post Office had got it wrong for all
 7 those years and there was a need to really change, and
 8 it's the change I'm really driving at.
 9 **SIR WYN WILLIAMS:** I think you can all safely conclude that
 10 everybody in senior positions realised they needed to
 11 change once they read and digested that judgment.
 12 **MS PAGE:** Well, sir, that's what I'm exploring.
 13 **SIR WYN WILLIAMS:** Yes, well, I don't think you need to.
 14 I think I've got that point, whatever Ms Marshall says.
 15 All I'm saying is it's self-evident, is it not,
 16 Ms Page?
 17 **MS PAGE:** Well, I'm not sure that it is. That's exactly my
 18 point, sir. I think that there's reason to think that
 19 it may have taken some time before people realised the
 20 need for change.
 21 **SIR WYN WILLIAMS:** Well, that might be right as well but
 22 I have to look at it objectively, don't I?
 23 Anyway, sorry. Go on.
 24 **A.** I'm happy to answer if you want me to?
 25 **MS PAGE:** When did you think there was going to be a need
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1 **A.** I've had conversations with many people across Post
 2 Office, and my wider teams, ever since 2019, about the
 3 impact of Common Issues Judgment; I've had many
 4 conversations with postmasters about it; I've had many
 5 conversations with the NFSP about it.
 6 **Q.** Have you spoken to them about the sort of activity we
 7 can see you were involved with, albeit you say
 8 tangentially, of spinning myths, of perpetrating myths.
 9 Have you talked to them about that and their own conduct
 10 of that sort of behaviour and how they feel about it and
 11 whether they see they need to change?
 12 **A.** The first I saw -- I remembered of any of the details
 13 you've shown me today was when they were disclosed to
 14 the Inquiry. So before to that no, I hadn't because
 15 I couldn't recollect being involved. Since they've been
 16 disclosed, yes, I have had conversations with my own
 17 team and other colleagues across the business, about
 18 those emails, about my perceived role in those, and
 19 I think that certainly the emails that you've shown me
 20 point to, culturally, a Post Office that was very flawed
 21 in the past.
 22 What I can say is that, you know, in the roles that
 23 I've been doing, and from my perception of the wider
 24 business now, we've got more work to do, of course, but
 25 we have significantly changed, culturally. That's what
 95

1 for serious change?
 2 **A.** I think I was in quite a fortunate position at the time,
 3 personally, that, by the time the Common Issues Judgment
 4 was handed down, I was already very much in a role
 5 focused on postmasters and making improvements. So,
 6 whilst there was some shock at the fact that the Post
 7 Office had lost both of the trials, the Common Issues
 8 and the Horizon Issues Judgment, and there was a shock
 9 at the extent of our failings as an organisation, I was
 10 personally, I think, very quick -- very quick -- because
 11 I was already focusing on the things that weren't
 12 working for postmasters and that's kind of the role I've
 13 had ever since.
 14 **Q.** You've told us about the people that you work with in
 15 Contract Management who are mostly -- the Contract
 16 Managers and their boss are mostly people like you, who
 17 have grown up in Post Office, if I can put it in that
 18 way: people with very long careers in Post Office?
 19 **A.** Some of them are, yes.
 20 **Q.** You've told us that the structured training on the
 21 Common Issues Judgment and the Inquiry, and so forth, is
 22 something that they've all had to go through?
 23 **A.** Yes.
 24 **Q.** Did you have conversations with people afterwards about
 25 what that meant?
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1 I see. Prior to 2019, I don't think we've really put
 2 postmasters at the heart of very much. Nowadays, we
 3 absolutely do, and that's right. That's got to be right
 4 and we've got to continue to do that.
 5 **Q.** Only today, through questioning, have you identified,
 6 for example, the need to review the guidance which puts
 7 the burden of proof on postmasters to demonstrate why
 8 they're disputing a discrepancy. Do you think that your
 9 past and the culture that you grew up in has played
 10 a part in that failure to fully change the mindset?
 11 **A.** I don't. I don't. My focus is very much on making
 12 improvements for postmasters.
 13 **Q.** Has it got anything to do with why you hadn't
 14 identified, for example, that problem before?
 15 **A.** No, it hasn't.
 16 **MS PAGE:** Thank you, sir.
 17 **SIR WYN WILLIAMS:** Thank you, Ms Page.
 18 **MR STEVENS:** Sir, sorry --
 19 **SIR WYN WILLIAMS:** I'm sorry, I can't hear you.
 20 **MR STEVENS:** Ah, can you hear me now, sir?
 21 **SIR WYN WILLIAMS:** Yes.
 22 **MR STEVENS:** I think that's the first time that question has
 23 had any actual effect!
 24 I may be being over cautious here. I was reviewing
 25 the [draft] transcript and at LiveNote 86/18,
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1 Ms Marshall was asked about "So when do you think you
2 did recognise that convictions were wrongful?", and
3 there was a long answer but it was "couldn't pinpoint it
4 specifically". Then, as it's on the page, Ms Page's
5 next question was:
6 "Is it possibly not until '*Bates vs The Post*
7 *Office*'?"
8 "**Answer:** It was absolutely before then."
9 I just think for clarity, can I ask, when you refer
10 to *Bates vs The Post Office*, were you referring to the
11 Group Litigation or to the ITV drama, *Mr Bates vs the*
12 *Post Office*?
13 **A.** That may be a question for -- I was thinking it was the
14 drama, the ITV drama; is that correct?
15 **MS PAGE:** So was I.
16 **MR STEVENS:** Yes. It's just how it reads is slightly --
17 months down the line.
18 **A.** Understood.
19 **MR STEVENS:** We're just checking that that was what you were
20 answering. Thank you.
21 Apologies, sir.
22 I think Mr Jacobs has some questions.
23 **SIR WYN WILLIAMS:** Right, fine.
24 **MR JACOBS:** I do, sir, I'm conscious of the time. I'll try
25 to and be quick.

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1 Post Office does not recover shortfalls -- recover
2 shortfalls -- unless the subpostmaster agrees but
3 applies a different approach in relation to suspending
4 and terminating on the basis of shortfalls?
5 Do you see that there's a disconnect there,
6 Ms Marshall?
7 **A.** I do, and I can't comment on why we don't recover
8 shortfalls apart from where the postmaster agrees.
9 That's not my area. I think, in the cases of
10 suspensions or terminations, where there are
11 discrepancies and where the postmaster might not agree
12 with the reason for those discrepancies, I'd refer to my
13 earlier point that, where we're taking decisions to
14 suspend or terminate contracts, the team aren't basing
15 those decisions on discrepancies as such.
16 They're making the decisions based on that being the
17 outcome, as in it's due to operational performance
18 issues in branch, such as having lots of excess cash or
19 not doing monthly/weekly trading, et cetera.
20 But I appreciate there is a slight disconnect there
21 in the language.
22 **Q.** I think our point, which I ought to, in fairness, put to
23 you, is: don't you think that the policy should reflect
24 that, should reflect that suspensions and terminations
25 will not be pursued in relation to Horizon generated

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1 **Questioned by MR JACOBS**
2 **MR JACOBS:** Ms Marshall, Simon Oldnall gave evidence
3 yesterday and he said that Post Office doesn't recover
4 losses from subpostmasters, except where a postmaster
5 agrees the reason for the shortfall.
6 **A.** I that's my understanding at the moment, yes.
7 **Q.** You've confirmed that's your understanding in your
8 evidence today. Now, Mr Stevens took you in your
9 evidence to the Contracts Termination Policy?
10 **A.** Yes.
11 **Q.** Do you remember -- we don't need to turn it up because
12 it's fresh in our minds, I hope -- paragraph 4.6,
13 "Repudiatory breaches"?
14 **A.** Yes.
15 **Q.** Do you remember that it said that, where there are
16 discrepancies of significant value that have been caused
17 by negligence, carelessness or error of the postmaster,
18 that resulted in a loss to the Post Office, and have
19 been fully investigated by the Post Office, that is
20 grounds for suspension and grounds for termination?
21 **A.** Yes.
22 **Q.** Do you accept that there is therefore scope within this
23 policy for suspension based on a Horizon shortfall?
24 **A.** There is, yes.
25 **Q.** Yes. This is my question for you: why is it that the

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1 shortfalls?
2 **A.** I think we need to tighten up our wording. Of course,
3 having a discrepancy in a branch and having shortfalls
4 is, by definition, a reason for an investigation to
5 happen by the Central Operations Team, but we can
6 tighten up our wording, absolutely.
7 **Q.** It's more about wording, isn't it? Our clients tell us
8 that they are concerned that the wording of the policies
9 does not reflect the express intentions given by you and
10 other witnesses from Post Office who are giving evidence
11 in this phase; do you see that?
12 **A.** I do, and I think it's very clear to me that the
13 position that we take in our policies should be the
14 position that myself, others, our teams, are all
15 adhering to. I also hope that, with the publication of
16 these external-facing policies that I've talked about
17 and on a new template, that will hopefully provide
18 clarity to postmasters too. A key thing for me is that
19 we do want to include postmasters much more in
20 day-to-day operational matters such as that. So I would
21 welcome any feedback that they have on the wording of
22 such policies, et cetera.
23 **Q.** So are these policies likely to be reworded or reviewed?
24 **A.** All of the policies, as I've said, are always reviewed
25 on an ongoing basis. We're putting them on

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1 externally-facing templates, which are going to be
2 looked at by the NFSP. We're very happy to bring other
3 postmasters into the fold there too before they're
4 published.

5 **Q.** You've anticipated my next question: will subpostmasters
6 be allowed to be or be permitted to see these policies
7 in draft before they're published and be consulted?

8 **A.** We certainly want to include other postmasters in the
9 consultation of those policies, and our Postmaster NED
10 looks as those policies as well, Elliot Jacobs, and as
11 well as Mark Eldridge, our Postmaster Experience
12 Director.

13 **Q.** I have one final quick series of questions for you and
14 this is in relation to the Fujitsu letter, are you aware
15 of that, from Mr Patterson to Mr Read?

16 **A.** I'm aware from previous evidence, yes.

17 **Q.** I'll quote from it, it's 17 May 2024:

18 "To be clear SFL will not support the Post Office to
19 act against subpostmasters. We will not provide support
20 for any enforcement actions taken by Post Office against
21 subpostmasters, whether civil, criminal, for alleged
22 shortfalls, fraud or false accounting."

23 When did you first see this letter; when were you
24 first made aware of it?

25 **A.** Only in the Inquiry.

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1 **MR JACOBS:** I don't need to ask you any more questions.

2 **THE WITNESS:** Thank you.

3 **MR JACOBS:** That's all from me, thank you.

4 **Questioned by SIR WYN WILLIAMS**

5 **SIR WYN WILLIAMS:** In the light of those questions, can we
6 just revisit paragraphs 143 of your witness statement,
7 Ms Marshall -- I'm sure that it's WITN11610100 --
8 because I want to be sure I'm fully understanding the
9 table, all right --

10 **A.** Yes. Yes, sir.

11 **SIR WYN WILLIAMS:** -- once it's up. Just a little further
12 on, please. It's actually on page 61, that's what I'm
13 looking for. That's it. That table.

14 Now, as I've understood it -- and I'm concerned only
15 with the most recent period, all right. So let's start
16 in 2021/22. So in that year, there were 25 branches
17 where suspensions occurred, yes?

18 **A.** That's correct, sir.

19 **SIR WYN WILLIAMS:** That may or may not mean 25 postmasters,
20 some postmasters may have had more than one branch, so
21 we should focus on branches, yes?

22 **A.** Correct.

23 **SIR WYN WILLIAMS:** The figure in brackets, 13, as I've
24 understood what follows under figure 1, means that they
25 were cases which relied on Horizon data?

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1 **Q.** Okay. The Contracts Termination Policy that we've
2 talked about requires a full investigation, doesn't it?

3 **A.** Into discrepancies, yes.

4 **Q.** How can Post Office fully investigate discrepancies
5 without assistance from Fujitsu; that's a real problem,
6 isn't it?

7 **A.** I think it is and I think I'm very confused, personally,
8 by the letter.

9 **Q.** Fujitsu doesn't consider that the Horizon system should
10 be used to evidence shortfalls. Do you accept that the
11 Horizon system should not be used to support suspensions
12 of terminations based on shortfalls?

13 **A.** As I'll go back to my previous comment, I'm quite
14 confused with the letter from Paul Patterson and why
15 Fujitsu won't stand behind their data. I'm not a data
16 expert or an IT expert but it's fascinating that they
17 can't stand behind the data when the data is fundamental
18 to everything that we do in our operations, quite
19 frankly, across our network.

20 **Q.** Well, you say it's fascinating, but it's because of what
21 happened in the scandal, isn't it?

22 **A.** Sure.

23 **Q.** The effect of that letter makes many of Post Office's
24 policies unworkable, doesn't it?

25 **A.** I understand.

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1 **A.** That's correct, sir.

2 **SIR WYN WILLIAMS:** Fine. So what I want to know is, was the
3 reason for the suspension that Horizon demonstrated
4 a shortfall or was the reason something different?

5 **A.** Without knowing the specifics of each case, sir, I would
6 say that the majority of them -- in brackets, the 13
7 there that's highlighted -- would have been following
8 the result of an investigation into discrepancies or
9 shortfalls, which would have been down to Horizon data
10 and the suspension would have been enacted as a result
11 of that, yes.

12 **SIR WYN WILLIAMS:** But you also seem to be saying, in parts
13 of your evidence, that there wouldn't be a suspension
14 simply because Horizon showed a shortfall: there would
15 only be a suspension if there was an established reason,
16 after an investigation, which justified a suspension.
17 So do I take it that what you're telling me is that the
18 starting point is that Horizon shows a shortfall, there
19 is then an investigation into how that shortfall came to
20 be caused, and it is only if that investigation
21 demonstrates, in effect, some fault on the part of the
22 postmaster that a suspension would follow?

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

24 **SIR WYN WILLIAMS:** So that's the process that I should
25 understand, is it, when I interpret this table: in that

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1 year there were 25 suspensions, 13 of which, in effect,
 2 commenced by reason of Horizon showing a shortfall but
 3 they only occurred because, following an investigation,
 4 a suspension was thought to be justified because of the
 5 activities or actions of the postmaster?
 6 **A.** That's correct. The figures in brackets there, the 13,
 7 would have been based on Horizon data, discrepancies or
 8 shortfalls identified, but there would have been a full
 9 and proper and thorough investigation into the cause of
 10 those shortfalls, which would have then led to the
 11 determination to suspend the contract, sir. Yes.
 12 **SIR WYN WILLIAMS:** In the years that we are talking about,
 13 2021/22 onwards, whether or not the suspension actually
 14 occurs goes through the process that you described in
 15 evidence when Mr Stevens was asking you questions?
 16 **A.** Yes, sir.
 17 **SIR WYN WILLIAMS:** Fine, all right. Then that deals with
 18 that.
 19 Then the final point I want to ask you about is the
 20 years 2021/22 and 2023/24, and the footnotes to the
 21 cases in progress, all right?
 22 **A.** Mm-hm, yes.
 23 **SIR WYN WILLIAMS:** There are still, from 2021/22, two cases
 24 in progress; that's right, is it not?
 25 **A.** Yes. Could we go to the footnote, please, sir?
 105

1 we are referring here -- the ones in brackets are the
 2 suspensions that have been prolonged due to issues in
 3 arranging postmaster meetings. One is now at the final
 4 stage and with external professional advisers.
 5 **SIR WYN WILLIAMS:** So that deals with the long suspension
 6 but my question was, and perhaps you don't know, whether
 7 the two cases in brackets in the table are also the two
 8 cases where the postmasters have been arrested and
 9 charged?
 10 **A.** No, they're not, sir.
 11 **SIR WYN WILLIAMS:** Right. So in none of the cases -- this
 12 is the point -- in the table which we've been looking
 13 at, are they what I'll call Horizon cases?
 14 **A.** Correct.
 15 **SIR WYN WILLIAMS:** Fine. Thank you very much. I just
 16 wanted to be absolutely clear as to where we were on
 17 that.
 18 **THE WITNESS:** Thank you, sir.
 19 **SIR WYN WILLIAMS:** Right, good.
 20 Well, thank you very much, Ms Marshall, for coming
 21 to give oral evidence today and for making your witness
 22 statement on behalf of the Post Office. I'm very
 23 grateful to you for doing that.
 24 So what time shall we resume, Mr Stevens?
 25 **MR STEVENS:** Sir, I'm in your hands. We can either do 2.00
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1 **SIR WYN WILLIAMS:** Neither of which depend upon a Horizon
 2 shortfall, as I understand it.
 3 **A.** The footnote 18, which we've just looked at, relates to
 4 postmasters having been arrested and charged with
 5 offences, yes.
 6 **SIR WYN WILLIAMS:** Yes. I'll get to 18. There's a "0" in
 7 brackets after the "2", you see? If we go back to the
 8 table, sorry, you see there's two cases in progress.
 9 **A.** Yes.
 10 **SIR WYN WILLIAMS:** But in brackets "0", which to me says
 11 that neither of these were dependent, even as a starting
 12 point, on Horizon showing a shortfall.
 13 **A.** That's correct, sir, because these were both cases where
 14 the police had intervened and the postmaster had been
 15 charged with offences.
 16 **SIR WYN WILLIAMS:** Fine. So I needn't bother with those,
 17 now that I've got that, fine.
 18 It's the next one, 2023/24, where there are still
 19 four cases in progress, but two cases start life, if you
 20 like, with Horizon demonstrating a shortfall.
 21 **A.** Yes.
 22 **SIR WYN WILLIAMS:** Now, are those two cases the two cases
 23 which are referred to in footnote 19?
 24 **A.** Can we scroll down to footnote 19, please? That's
 25 correct, sir. So the two -- if we look at footnote 19,
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1 or 2.10. I don't think we should have problems with
 2 time to start at 2.10, if you prefer.
 3 **SIR WYN WILLIAMS:** Well, then, I do prefer.
 4 **MR STEVENS:** Thank you, sir.
 5 **SIR WYN WILLIAMS:** Yes.
 6 (1.12 pm)
 7 (The Short Adjournment)
 8 (2.10 pm)
 9 **MR STEVENS:** Good afternoon, sir. Can you see and hear us?
 10 **SIR WYN WILLIAMS:** Yes, thank you.
 11 **MR STEVENS:** We are hearing from Ms Park.
 12 **SIR WYN WILLIAMS:** Yes.
 13 **MELANIE JANE PARK (affirmed)**
 14 **Questioned by MR STEVENS**
 15 **MR STEVENS:** Please can you state your full name?
 16 **A.** Melanie Jane Park.
 17 **Q.** Ms Park, as you know, my name is Sam Stevens and I ask
 18 questions on behalf of the Inquiry. First, can I thank
 19 you for producing a written statement today and,
 20 secondly, for attending the Inquiry to give oral
 21 evidence. I want to turn first to that statement which
 22 should be in front of you in a bundle of documents. Can
 23 I ask you to turn that up, please --
 24 **A.** Mm-hm.
 25 **Q.** -- and just confirm that's your statement of 22 August
 108

1 2024.

2 **A.** Yes, it is.

3 **Q.** Now, before we go any further, there's one correction

4 I understand you wish to make. That's at paragraph 162,

5 please, which is page 71 of the statement. That will

6 come up on the screen, as well. I'll just wait for it.

7 What I'll do is provide a summary of what I think the

8 correction is and you can tell me if you think I'm right

9 or wrong.

10 Five lines down, there's a sentence that reads:

11 "The cost of a given ARQ request corresponds with

12 the length of period being requested, for example ARQ

13 data for a 6-month period will cost more than a request

14 for a 3-month period."

15 My understanding is that, when you signed that, you

16 understood that to be correct on the basis of

17 information from Subject Matter Experts. You now

18 understand that that isn't correct, you wish to strike

19 it out of the statement and it is dealt with by the

20 evidence of another Post Office witness?

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

22 **MR STEVENS:** So, sir, the highlighted text should be struck

23 out of the witness statement, effectively.

24 **SIR WYN WILLIAMS:** Yes, thanks very much.

25 **MR STEVENS:** The statement can come down from the screen but

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1 **A.** No, I haven't.

2 **Q.** Very briefly, could I just ask you to give an overview

3 of your career before joining the Post Office?

4 **A.** Mm-hm. I qualified as a chartered accountant in 1997

5 with KPMG, following which I moved to Boots the Chemist

6 in December 1997, where I stayed for 24 years. So

7 I started out doing various financial roles, both pure

8 financial accounting and more business partnering

9 latterly, and then moved into a more operational role

10 and then was Head of Retail Operations before I left.

11 **Q.** In terms of your reporting line, I understand you report

12 to Neil Brocklehurst, the Interim Chief Operating

13 Officer?

14 **A.** I do, yes.

15 **Q.** In broad terms, could you summarise your roles and

16 responsibilities at the Post Office?

17 **A.** Yes, I have a number of quite different

18 responsibilities: the first of which is I have

19 responsibility for the Branch Support Centre, so the

20 team up in Chesterfield that are responsible for

21 supporting postmasters with a number of different

22 matters, we have a team of about 50 people up there.

23 That's the Branch Support Centre. I also have

24 responsibility for the network reconciliation and

25 support team, and they're responsible for understanding

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1 could we please turn to page 101 of the statement; do

2 you see a signature?

3 **A.** I do, yes.

4 **Q.** Is it your signature?

5 **A.** It is.

6 **Q.** Are the contents of that statement true to the best of

7 your knowledge and belief?

8 **A.** They are, yes.

9 **Q.** Thank you, Ms Park. That statement now stands as your

10 evidence in this Inquiry. It will be published on the

11 Inquiry website shortly. For the record, the unique

12 reference number is WITN11600100. I'm going to ask you

13 some questions about it but not every aspect of what is

14 a very detailed statement.

15 I'll start with similar questions to what I did this

16 morning. You have been chosen by Post Office to act as

17 a witness to give evidence on its behalf in response to

18 parts of two Rule 9 Requests sent to it; is that right?

19 **A.** That's correct.

20 **Q.** You are the Central Operations Director to the Post

21 Office?

22 **A.** I am.

23 **Q.** When did you join the Post Office?

24 **A.** 17 October 2022, so two years tomorrow.

25 **Q.** Have you had any other role at the Post Office?

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1 any discrepancies, as a result of proactive comparison

2 of third-party data and issuing transaction corrections,

3 should they need to, once they've been investigated.

4 They also have the Network Monitoring Team as well

5 and their role is to again proactively look for branches

6 that might not be following operational processes as we

7 would like, and that which may suggest they are

8 struggling with those processes and try and intervene

9 before those processes lead to potential discrepancies,

10 as we've heard this morning.

11 I'm also responsible for the Network Support and

12 Resolution Team, and they are the team that help

13 postmasters with the review of discrepancies. So should

14 a postmaster use "Review or Dispute", and it can't be

15 call into the Branch Support Centre, they will be the

16 team that review the discrepancy and ultimately agree

17 the resolution with the postmaster.

18 **Q.** Presumably you received a formal induction when you

19 joined the Post Office?

20 **A.** Yes, I did. I had a very -- I had six weeks where

21 I wasn't part of my role, I was travelling around the

22 various functions within Post Office, so the commercial

23 functions, the rest of the retail functions, to really

24 try and understand the rest of the role that I was being

25 brought in to do.

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- 1 **Q.** Was there any discussion as part of your induction on
2 the findings by Mr Justice Fraser, as he then was, in
3 the Group Litigation?
4 **A.** Not formally. I think when I knew I'd taken a role at
5 Post Office, I made it by business to start doing some
6 research and looking into it and then I did get a number
7 of documents, when I first came, to read through and
8 then I've attended the Inquiry on a number of occasions
9 to try and understand in a bit more detail the impact
10 that -- on postmasters, such that it would help me do my
11 role more effectively.
12 **Q.** I want to look at branch assurance and audits. Could we
13 look, please, at your statement, page 14, paragraph 38.
14 You say:
15 "The Inquiry has used the term 'audits' in relation
16 to [a set of questions]. Post Office does not carry out
17 audits on branches. The Branch Assurance Team attend
18 a branch to count physical cash and stock and establish
19 whether that agrees with what is record in Horizon."
20 That process before was known as an audit in Post
21 Office, wasn't it?
22 **A.** It was, yes.
23 **Q.** Is it not effectively describing what an audit is, in
24 any event?
25 **A.** I don't believe so. So, in my experience as both
113

- 1 as 'very good', and one was ranked as 'good'.
2 That was July 2024. From your experience, how does
3 that stack up to other months: is that about average for
4 the results or better or worse?
5 **A.** I think given that this feedback form was only
6 introduced in June this year, I believe, I think it's
7 actually probably a better response than we would
8 generally see when we --
9 **Q.** Sorry, can I just check -- it's my fault for asking the
10 question. When you say "better response", do you mean
11 the number of responses you get back to the question or
12 whether this is satisfactory --
13 **A.** In terms of the number of responses that we've had
14 since, and we've had some updated figures, and they
15 actually show a much improved response rate. So we are
16 getting a significantly increased response rate, if we
17 look -- versus what we see in other areas. And I think
18 it is important, because this could be quite an emotive
19 area, if -- and it's important that we seek feedback and
20 get feedback, and act on that feedback.
21 **Q.** So you've noticed more responses. Is there any
22 difference to the ranking? So here it's 12 ranked as
23 "excellent", one as "very good", one as "good"; is it
24 about the same proportions or are they different?
25 **A.** I think they've slightly improved. From my
115

- 1 an external auditor and an internal auditor,
2 particularly external audit, you're looking at accounts
3 trying to understand the validity of the data in those
4 accounts. This is different -- this is simply
5 a stocktake, in effect. So what we're doing is ensuring
6 the physical value of the cash and stock and cash
7 equivalents in that branch and comparing it to what the
8 system thinks, as any other retailer would do on their
9 annual stock takes.
10 **Q.** So your view, this is just correcting, essentially,
11 incorrect terminology?
12 **A.** Yes, it's ensuring the physical value, as it stands at
13 that point in time.
14 **Q.** Page 20, please, of your statement, paragraph 53. It's
15 a point on feedback about branch audits. You say that:
16 "During a visit, the Lead Assurance Advisor will
17 give the postmaster a Branch Assurance Visit findings
18 letter ..."
19 You go on to say:
20 "The form also gives postmasters an opportunity to
21 give feedback on the Branch Assurance Visit and their
22 experience with the team. In July 2024, 34 Branch
23 Assurance Visits were completed, and 14 responses were
24 received to that feedback request. Of these 14
25 responses, 12 were ranked as 'excellent', one was ranked
114

- 1 recollection, I think we've received more "excellent"
2 and then probably one or two "good" and "very good", but
3 there are definitely more "excellents" than this data.
4 **Q.** Could we look, please, at EXPG000007. This is the
5 YouGov survey that was commissioned by the Inquiry.
6 Have you had the chance to review this?
7 **A.** I have, yes.
8 **Q.** Can we turn please to page 32. We see it says, "Branch
9 audits", its referring to the same thing: the Branch
10 Assurance. Since January 2020, just over 3 in 4
11 postmasters surveyed said that their branch has not
12 received an audit; 12 per cent reported that they have
13 received an audit:
14 "Those who have received an audit [this is the third
15 paragraph] since January 2020 were more likely to be
16 satisfied than dissatisfied with how it was conducted.
17 Over half ... were satisfied compared with around one in
18 five ... who were dissatisfied."
19 So there appears to be a difference here in that
20 there are some people expressing through the YouGov
21 survey dissatisfaction with branch assurance; would you
22 agree?
23 **A.** Yes.
24 **Q.** Are there in place any plans within Post Office to
25 investigate why there might be a difference between the
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1 results of the YouGov survey and results you're
 2 obtaining through the feedback forms?
 3 **A.** I think we have to look at the current process. I think
 4 Ms Marshall referred earlier, without understanding the
 5 detail of the people who completed this survey, it's
 6 really difficult to go and ask questions about
 7 historical assurance visits. I think what we have to do
 8 is take the feedback for the -- again, for the assurance
 9 visits that we're doing now and, where we see
 10 dissatisfaction, we seek to understand why those
 11 postmasters might have been dissatisfied with that visit
 12 and take appropriate actions, either across the
 13 assurance visit piece, or with the individuals that have
 14 conducted that assurance visit.
 15 **Q.** Do I take it from your evidence earlier that Post Office
 16 is seeking to increase the rate of return on those
 17 feedback forms, so the number of people returning either
 18 positive or negative feedback results?
 19 **A.** Yes, I think the latest data, I think about 35 per cent
 20 of visits conducted since June have received a feedback
 21 form, so it is higher than we would normally see across
 22 Post Office but we would always look to try to encourage
 23 postmasters to feed back following a visit.
 24 **Q.** Could we look, please, I want to look at the Branch
 25 Assurance Team, please. Could we look at POL00448256.

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1 **Q.** Apologies, training guide?
 2 **A.** So it doesn't sit in the policy that is the Postmaster
 3 Support Policies. In answer to your question: I'm not
 4 sure. I joined in 2022 and this team don't line report
 5 into me, so I'm not sure when this actual training guide
 6 will have been enacted and taught through the teams that
 7 exist.
 8 **Q.** Would the people in the Branch Assurance Team who were
 9 in post before Common Issues, have been given training
 10 on their role or how the policies have been updated
 11 since Common Issues?
 12 **A.** I couldn't say for certain. My understanding is they
 13 would all have been given training on the policy that
 14 stands and I think we've heard that the postmaster
 15 policies -- that we have annual training on the
 16 postmaster policies with the relevant teams. I couldn't
 17 say on that particular piece of training material. I do
 18 know that, shortly after I joined, the Branch Assurance
 19 Advisors were all taken through additional training, and
 20 of the Head of Operational Support, who they now line
 21 into, has done a lot of work with them to show that,
 22 actually, the role of the stock check, it's just as
 23 important how you do it and how you conduct yourself and
 24 how you make the postmaster feel when doing that stock
 25 check, and that's just as important as making sure you

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1 This is a "Branch Assurance Advisor -- Induction &
 2 Training", I think policy or report. At paragraph 60 of
 3 your statement you say:
 4 "There have been no new joiners since this was last
 5 updated."
 6 Is that correct?
 7 **A.** That's my understanding, yes.
 8 **Q.** How many currently within the Branch Assurance Team were
 9 in post before the Common Issues Judgment?
 10 **A.** I've been advised by the head of that team that I think
 11 it's 12 of the 18. I couldn't be quite sure but I did
 12 ask that myself and my understanding is it's 12, or
 13 around that number. A lot of -- most of them have been
 14 in role for a significant length of time.
 15 **Q.** Could we look, please, at page 5. It's not
 16 a particularly thrilling question about version control
 17 but it will help us understand the document. If we
 18 could go down, please, we see here the version controls
 19 for this training document and, on 1 September 2021,
 20 this version 0.1 is a draft version, and we've got
 21 decimal point figures to 4, then 3.1 and 4.0. At what
 22 point in this version control did this become a policy
 23 that was implemented and not just a draft policy?
 24 **A.** So this isn't a policy; I believe this is a training
 25 guide.

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1 do an accurate count. And I know that training has
 2 been -- that all of the advisors have been through that
 3 training since I joined.
 4 **Q.** Some current and former postmasters have suggested that
 5 Branch Assurance Visits should be conducted by a body
 6 independent of the Post Office. What would you say to
 7 that suggestion?
 8 **A.** I understand why they would suggest that, and I know
 9 a lot of retailers would use third parties to do those
 10 stocktakes. I think having a knowledge of the Horizon
 11 system and how you update that system, once you've done
 12 your stock count, is really important. And having the
 13 knowledge -- we run quite a complicated business, if you
 14 look at the number of the stamps we sell, the currency,
 15 the foreign currency, having that background knowledge,
 16 will, I believe, make that stock count much more
 17 accurate than employing an outside body to come in and
 18 do that count on our behalf. But that's my opinion
 19 rather than fact.
 20 **Q.** Can we bring up your statement, please, page 17,
 21 paragraph 47. This is looking to the future of branch
 22 assurance. You say:
 23 "Post Office is currently reviewing the
 24 circumstances where an announced visit may not be the
 25 most appropriate cause [sic] of action."

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1 Should that be "course of action"?

2 **A.** "Course", yes, sorry.

3 **Q.** "The intention is for there to be a three-tier process:

4 (i) announced visits (as is current practice); (ii)

5 notified visits whereby postmasters are informed that

6 a visit will be taking place on a specified date ..."

7 Just pausing there, is the difference between

8 an announced visit and a notified visit that the

9 subpostmaster agrees the date of the visit on the former

10 but not the latter?

11 **A.** That's right, yes.

12 **Q.** Then there's:

13 "... unannounced visits, with a clear governance

14 protocol as to how and when these may be required."

15 If we look at paragraph 46, you say:

16 "In the past year there have been two unannounced

17 visits which took place in exceptional circumstances

18 with sign off from the Chief Executive Officer, Nick

19 Read."

20 At present, if there's an unannounced visit, does

21 that have to sanctioned by the Chief Executive?

22 **A.** That is under review at the moment. I can't remember if

23 I wrote in my witness statement that the circumstances

24 between these three tiers of announced, notified and

25 unannounced has been reviewed, and I believe there's

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1 **A.** The Postmaster Account Support Team.

2 **Q.** Sorry, Account; and do they all report to you?

3 **A.** They do, through their head of, the BSC reports through

4 a different head of; the Network Support and Resolution

5 reports through a different head of.

6 **Q.** Are there systems in place to ensure that relevant

7 knowledge of dispute resolution issues is communicated

8 between those teams?

9 **A.** Yes, absolutely. The case management system that we use

10 allows a case to be created and then, as it's handled

11 through each of those processes, details of that, how

12 the -- the details of the case will be logged and, if it

13 can't be resolved at each initial stage, all of those

14 details will be passed through to the next stage, so

15 they will be aware of all the checks and balances that

16 have already happened, before they start with their bit

17 of the process.

18 **Q.** I think, as I understand it, that's on one particular

19 case: someone is dealing here within one team, it gets

20 passed over to another. I more meant are there any

21 systems in place that the people in different teams

22 could spot if there were themes or trends in dispute

23 resolution issues?

24 **A.** Yes, so the branch support centre, part of their role is

25 to understand if there are systemic issues and

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1 a paper, a recommendation paper, going to the SEG at the

2 end of next month, if not next month. But we would

3 definitely seek approval if we wanted to do

4 an unannounced visit.

5 **Q.** On the current proposal, from whom will you be seeking

6 approval to do an unannounced visit?

7 **A.** I think, as it stands at the moment, it would be the

8 Interim CEO.

9 **Q.** In what circumstances is it envisaged that

10 an unannounced visit would be used?

11 **A.** I think where we believe there have been serious

12 breaches of contract and we've failed to engage the

13 postmaster through all of the support mechanisms that we

14 try and intervene with those postmasters prior to this,

15 and they've failed to engage in any of that and we are

16 concerned as to the assurance of those assets in that

17 branch, and that the notified would impact the outcome

18 of that.

19 **Q.** I want to look now at, I think, the most substantial

20 topic I'll deal with, which is investigating and

21 resolving discrepancies. As I understand it, the

22 dispute resolution system, as it were, has three primary

23 teams involved: the Branch Support Centre; the Network

24 Support and Resolution Team; and the Postmaster Agent

25 Support Team; is that correct?

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1 particularly short-term issues that have arisen. We

2 sometimes have IT issues with some of our third parties,

3 and they would immediately understand that there's

4 a problem and raise that with the relevant functions if,

5 indeed, those functions hadn't already spotted it and

6 informed the Branch Support Centre.

7 In terms of the transaction correction team, so I'll

8 take, if I -- there are other investigations that we do

9 through the Network Reconciliation Team, and we do look

10 at themes. So, for example, we know that 80 per cent of

11 our transaction corrections are issued due to cash pouch

12 errors. So, again, we look at the thematics and try and

13 understand how we stop it at source, rather than deal

14 with it once it's happened. A good example of that is

15 the issuing of note counters and the operational

16 excellence incentive.

17 If I come back to the network support and resolution

18 side of things, through the monthly meetings, they also

19 look at the root cause of the investigations that they

20 have reviewed into discrepancies and understand the

21 cause of those, and they are reported through.

22 **Q.** I want to look at ways into that resolution system.

23 Before I do, it's probably helpful just to set out what

24 it is. There's a Tier 1 investigation, or support,

25 which is handled by the Branch Support Centre; is that

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1 right?

2 **A.** That's right yes.

3 **Q.** If Tier 1 can't deal with it or resolve the matter, it

4 goes to Tier 2, which is handled by Tier 2 analysts in

5 the Network Support and Resolution Team?

6 **A.** That's right. There's an intermediate step, which is

7 a triage. So there is a triage case and the triage will

8 understand if there are any initial resolutions before

9 it goes into the full Tier 2 investigation. So there's

10 an intermediate stage.

11 **Q.** Then, on top of that, there's a Tier 3, handled by

12 Tier 3 analysts in the same team?

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

14 **Q.** The ways into the system: one is to dispute

15 a discrepancy at the end of a trading period --

16 **A.** That's right yes.

17 **Q.** -- and one is to dispute a transaction correction?

18 **A.** That's right yes.

19 **Q.** You say in your statement that a postmaster can call the

20 Branch Support Centre for assistance with a discrepancy

21 at any stage.

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

23 **Q.** If a postmaster rings the Branch Support Centre not at

24 the end of a trading period, so midway through,

25 regarding a discrepancy, will the Branch Support Centre

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1 again because it may have been a couple of days, they

2 might have spotted that a transfer hasn't happened

3 correctly between counters.

4 I think what this I referring to is the formal --

5 the formalisation of a discrepancy only happens at

6 trading period end and that's when the postmasters get

7 the opportunity to use the Review or Dispute function.

8 However, if the daily or weeklies don't balance in

9 between that, they can ring the Branch Support Centre

10 and, if it's significant -- and I think just for

11 context -- if it's significant and the Branch Support

12 Centre can't identify the cause, they do have the

13 opportunity to push it into the Tier 2 process prior to

14 the trading period end.

15 **Q.** Thank you. Can we look, please, at the screens that

16 a postmaster sees, and it's POL00448048. I hope you can

17 help us with some of these screenshots that you've

18 provided. So we have on the first page, it says,

19 "Screenshots of trading period end process", it says:

20 "Confirm Loss/Gain, One or more declaration totals

21 do not match the system derived figure.

22 "Press Continue to see a list of discrepancies for

23 confirmation."

24 So is this the screen that pops up after a balance

25 has been attempted and Horizon is saying there's

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1 follow the Tier 1 procedure?

2 **A.** They absolutely will. So I think you referred to them

3 earlier today. We have a number of checks and balances

4 that we ask postmasters to do on a daily, weekly and

5 monthly basis and, at any point in the processes, if

6 a postmaster experience -- or any of their assistants

7 experience a discrepancy in that balancing, they should

8 ring the Branch Support Centre if they're not able to

9 identify the cause themselves.

10 **Q.** Can we look, please, at your statement page 52,

11 paragraph 113. I just want to clarify one point. You

12 say:

13 "A postmaster wishing to dispute a branch

14 discrepancy must await trading period end to use the

15 [that's 'Review or Dispute'] function but can seek BSC

16 support earlier than that."

17 Now, just for clarity, if a postmaster raises

18 a discrepancy with the BSC mid-month, so not at the end

19 of the trading period, they can't resolve it at Tier 1,

20 does that go to Tier 2 at that point or do they have to

21 wait for the end of the trading period?

22 **A.** No, if they can't resolve it, generally the Branch

23 Support Centre will say, "If you can wait, if you can do

24 a balancing period, so do a full balance, and if it

25 still exists, call us back", and they will do the checks

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1 a discrepancy, but it doesn't say what it is yet?

2 **A.** Yes. So for context, my understanding -- and I haven't

3 worked in a branch but I have seen this process in

4 operation in our model office -- if you have more than

5 one counter, you have to do a declaration of each

6 counter and, if any of those counters has a discrepancy,

7 it moves into an account and you then move to the next

8 counter. Again, if that has a discrepancy, it goes

9 into -- I think we refer to it as the local suspense

10 account because it may be, if you've not done the

11 transfer correctly, you might have a surplus in one

12 counter and then a shortfall in the other, and they

13 match off.

14 If, when you come to roll your last counter and

15 there is still a balance in your local suspense, that is

16 in effect the start of that discrepancy process, where

17 you will then get given a choice of how you deal with

18 that discrepancy.

19 **Q.** Okay, so we get this screen. On the next page, we have,

20 "Confirm Rollover Type":

21 "Do you wish to rollover into the next [trading

22 period] or into the next [balancing period] in this

23 [trading period]?"

24 I don't think that's relevant because it's just

25 whether or not you're rolling over or into a trading

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1 period or balancing period?

2 **A.** That is correct.

3 **Q.** But that's correct. Thank you.

4 **A.** Yeah.

5 **Q.** If we turn over then please, this says, "Outstanding
6 Discrepancies":
7 "You have outstanding discrepancies of £9.99.
8 "Press Continue to transfer this to local suspense
9 and continue to rollover.
10 "Press Cancel to cancel the rollover."
11 So at this point, is what it's saying that you can
12 continue and go to rollover and deal with the
13 discrepancies or you can come out altogether and
14 effectively do the count again or anything like that?

15 **A.** That's correct, yes. This is the individual stock unit
16 rollover.

17 **Q.** So that's the stock unit. We then turn the page again.
18 So is this the rollover, so once you've done all the
19 stock units, you're then asking to roll over, and it
20 says:
21 "Branch Local Suspense amount is [minus] £9.99 which
22 must be resolved prior to rollover of stock unit, AA.
23 "Press Settle Local Suspense to resolve this and
24 continue to rollover.
25 "Press Cancel to cancel the rollover."

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1 button if certain that the discrepancy has been caused
2 by the postmaster's negligence, carelessness or error;
3 is that correct?

4 **A.** It's correct but, if I can add to that: and they're
5 comfortable putting their own cash in. There could be
6 a situation where they may know the cause but it may be
7 of a value that they can't put that value in all at
8 once --

9 **Q.** Right.

10 **A.** -- in which case they have a choice to then settle it to
11 Review or Dispute and discuss the next steps for that.

12 **Q.** Yes, I'm not going to get involved with that but look
13 just at the circumstances in which -- because we
14 wouldn't even get to that if the first bit wasn't
15 fulfilled --

16 **A.** No.

17 **Q.** -- so there has to be that.

18 **A.** Yes.

19 **Q.** Are we any further on with whether or not there will be
20 a warning on Horizon?

21 **A.** Yes, we are, in two ways. So my preference would be
22 that there is a pop-up box if a postmaster chooses to
23 select "Make good -- cash" and, at that point, they get
24 a reminder. There isn't currently a pop-up box at that
25 point in the trading period end process and that

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

2 **Q.** So, again, at this point, the discrepancy's been
3 highlighted, the postmaster can go forward to the next
4 screen or can come out and perhaps recheck the cash or
5 do anything like that?

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

7 **Q.** We then get the next one, which is two buttons "Make
8 good -- cash" and "Review Dispute CALL BSC".
9 I want to start with the "Make good -- cash",
10 please, and if we look at your statement at page 55,
11 paragraph 121 --

12 **A.** Is that going to be replaced on screen? Yeah.

13 **Q.** Yeah, sorry. You say:
14 "During preparations for Phase 7 of the Inquiry,
15 Post Office identified that before a postmaster elects
16 to settle to cash or cheque there is currently no
17 reminder in Horizon that the postmaster should only use
18 this function if certain that the issue has been caused
19 by the Postmaster's (or the Postmaster's assistant's)
20 negligence, carelessness or error. Post Office is
21 investigating if such a reminder could be implemented in
22 the Horizon system before completing settle to [cash]
23 process."
24 So, firstly, I take it from this that Post Office's
25 position is that a postmaster should only press the cash

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1 involves Accenture and Fujitsu. So the timescales for
2 that are much longer. So what I've asked to happen is
3 in the pop-up that you saw there, that says, "You have
4 a balance in your local suspense, do you want to settle
5 or cancel", we're going to expand that pop-up box to
6 have that message in to say, "Only do this if you're
7 really clear that that discrepancy was as a result of
8 a mistake in branch and that you are comfortable putting
9 cash in to balance this", and we can do that ourselves
10 within our IT function, so it's a lot quicker.

11 **Q.** Just for clarity, can we go back to POL00448048. Just
12 if we go to page 4, please, are you saying it will be at
13 this stage the message is displayed?

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

15 **Q.** Will that have the other benefit of -- because
16 presumably at this stage, a postmaster could see the
17 discrepancy, decide to cancel, recount the cash and then
18 decide to put the money in at that point, without
19 going -- without actually pressing the "Make good --
20 cash" button?

21 **A.** Absolutely, that would have that impact.

22 **Q.** So the warning will be sufficiently clear to postmasters
23 that they should only correct the cash if they are
24 certain of the circumstances, as you said?

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

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1 Q. That can come down. Thank you.
 2 When people do weekly balances and those sorts of
 3 matters, will there be equivalent warnings if
 4 a discrepancy is ever noticed when rolling into
 5 a balancing period or not?
 6 A. No, I don't believe so because the processes that we
 7 follow, or we ask postmasters to follow as part of their
 8 daily cash declarations or weekly balance wouldn't
 9 formalise a discrepancy. So we wouldn't ask them to
 10 action it, other than to call the Branch Support Centre
 11 if they need support to try and resolve it before
 12 trading period end.
 13 Q. I want to look now, please, at the other button, which
 14 was the "Review Dispute". Can we go to page 49 of your
 15 statement, please, paragraph 102.
 16 It says here that, initially, what was previously
 17 termed "Settle Centrally", it was, you say, 13 May 2021
 18 changed to "Review Dispute", and then in February 2023,
 19 the onscreen display was changed from "Review dispute"
 20 to "Review dispute CALL BSC". Why was the "CALL BSC"
 21 added?
 22 A. The process that we ask postmasters to follow, following
 23 use of Review or Dispute is to call the Branch Support
 24 Centre because the sooner we are engaged, the sooner we
 25 can start to understand the circumstances that that

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1 Support Advisor. If we turn the page, we see the job
 2 title at the bottom "Support Advisor". Then if we turn
 3 the page again, there's "Principal accountabilities",
 4 which are quite generic, and it says:
 5 "You will also have role specific bolt-on
 6 accountabilities. These are ..."
 7 At then over the page, the "Tier 2 Resolution
 8 Support Advisor", bolt-on. It says:
 9 "You will be an expert in Post Office branch
 10 operations, particularly branch accounting processes,
 11 and be able to use would be data sources to support
 12 postmasters and branches to find the causes of branch
 13 discrepancies."
 14 If we look at the Tier 3 Analyst one, as well,
 15 please. That's POL00448081. The Tier 3 Analyst and the
 16 second paragraph, the "purpose of the role", we see:
 17 "This is a specialist role that requires a high
 18 level of understanding of Post Office Operations to
 19 include extensive knowledge of Horizon and branch office
 20 accounting transactions ..."
 21 Then over the page, "Knowledge, experience and
 22 skills". If we go down, there's:
 23 "Excellent knowledge of Horizon, interpretation of
 24 branch logs ..."
 25 Why does the Tier 2 analyst's job description not

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1 discrepancy might have occurred.
 2 What we were seeing was number of postmasters using
 3 the Review or Dispute functionality and not calling the
 4 Branch Support Centre and asking for assistance to
 5 understand and resolve that discrepancy.
 6 Q. Has this had an effect; did you notice more calls
 7 following the change?
 8 A. We did, but what we've done since then -- and I don't
 9 know whether you'll come to it later in my witness
 10 statement -- we, following use of Review or Dispute, we
 11 relied on the postmaster to call us, so to create the
 12 case. And we had an outbound calling process through
 13 our Postmaster Account Support Team to try and contact
 14 that postmaster to discuss the discrepancy. What we
 15 have now is an automatic case create. So we have a link
 16 between the use of Review or Dispute directly into
 17 Dynamics. So we are able to see straight away where
 18 a postmaster's used Review or Dispute, understand if
 19 they've already called the Branch Support Centre, and
 20 then immediately start that outbound calling, if they
 21 haven't. So it allows us to intervene much quicker.
 22 Q. Thank you. I want to look at the Network Support
 23 Resolution Team so dealing with Tier 2 And Tier 3
 24 investigations. Can I look, please, at POL00039629.
 25 I think this is a generic job description for

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1 require expressly knowledge of or detailed knowledge of
 2 Horizon?
 3 A. I think the level of review that our Tier 2
 4 investigators, the checklists that they follow, they
 5 know where to get the data that they need to get to for
 6 that particular bit of the checklist. So knowing in
 7 detail the kind of inner workings of Horizon isn't as
 8 important than the Tier 3 team, who are reviewing much
 9 more complex cases but, also, overseeing the quality of
 10 those -- all of those Tier 2 cases.
 11 That said, many of our Tier 2 Support Advisors will
 12 come from Branch Support Centre or from internal roles,
 13 where they are taken through that Horizon training as
 14 part of that induction.
 15 Q. If we look at the Tier 2 role, please, if we look at
 16 POL00448229.
 17 This is a Postmaster Support Policy for accounting
 18 dispute resolution, and can we look, please, at page 15.
 19 If we can go down to show Tier 2, please. It says:
 20 "These investigations are fully detailed
 21 investigations after being assigned by Triage."
 22 The second bullet point is:
 23 "Undertaking a check of the Horizon system
 24 information to ascertain whether Horizon was
 25 a contributory factor to the Discrepancy ..."

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1 Bearing in mind the level of expertise with Horizon
 2 you just discussed for Tier 2 analysts, what does that
 3 check actually involve?
 4 **A.** It involves a number of things. So I think we talked
 5 about the branch impacting problem process that IT own,
 6 we have knowledge articles for all of the known branch
 7 impacting problems and screenshots of how those branch
 8 impacting problems might impact a branch. So one of the
 9 first things we do is check that the discrepancy hasn't,
 10 or the branch hasn't exhibited any of those branch
 11 impacting problems. We look at calls into the IT
 12 support desk as well as the Branch Support Centre to
 13 understand if the branch has logged any issues with
 14 their either hardware or software from a Horizon
 15 perspective, and then we recalculate a cash flow.
 16 So we take the opening balance from a set period and
 17 that's the period under review for the discrepancy. We,
 18 through HORice and Credence, the databases that hold the
 19 Horizon transaction data, we look at all the input --
 20 deposits and withdrawals and all of the cash flows
 21 through that branch, and recreate almost a closing
 22 balance, and we check that that is actually the closing
 23 balance that Horizon is showing us.

24 So we try and recreate that balance to understand
 25 whether we've got missing transactions that don't flow

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1 **Q.** You say "absolutely would be"; does that mean it hasn't
 2 happened today?

3 **A.** It's unusual.

4 **Q.** Are Fujitsu involved at all in the Tier 2 process?

5 **A.** No, they're not, other than requesting ARC data where
 6 required.

7 **Q.** Forgive me, sorry. I had a reference. If you could go
 8 to page 60, please. So you're here talking about after
 9 this Tier 2 process and you say:

10 "If there are no suspected issues, the investigation
 11 will continue and that might lead to a conclusion that
 12 Horizon was not a contributory factor in the
 13 discrepancy. However, if the data suggests that there
 14 could be an issue, the IT Team would do further
 15 analysis."

16 Is it fair to say, then, that the team, when
 17 resolving this, are -- once the investigation has been
 18 done, if they haven't found a problem or haven't
 19 identified a problem, they are still content to rely on
 20 the data produced by Horizon to satisfy themselves that
 21 there has been a loss to Post Office?

22 **A.** I think the data that sits from Horizon in HORice and
 23 Credence is the start of that investigation but the
 24 investigation looks at a whole raft of other things. So
 25 it looks at the operational strength of that branch;

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1 through to the bottom line from Horizon by taking that
 2 data out and recalculating it.

3 **Q.** You just mentioned the branch impacting problems.
 4 I think that's -- you say it's maintained by the IT Team
 5 within Post Office.

6 **A.** That's right, yes.

7 **Q.** So is it that the IT Team draft the copy that goes into
 8 the branch impacting problem database for your team to
 9 read when doing investigations?

10 **A.** Yes, so they create knowledge articles, and they're the
 11 Subject Matter Experts, so they will create the
 12 knowledge articles but a member of my team will review
 13 them to make sure they can be easily understood and they
 14 reflect the actual issue before they're published on the
 15 Knowledge Base that can be used by a number of different
 16 teams.

17 **Q.** Is there -- so there is some sort of assurance checking
 18 on that, but is there any checks to be done at Tier 3,
 19 so if Tier 2 can't resolve a matter, it goes to Tier 3,
 20 and they say, "Well, actually, this is a known problem
 21 in the branch impacting problem". Is there feedback to
 22 the IT Team to change the way the branch impacting
 23 problem database is worded, so that the Tier 2 team can
 24 understand it?

25 **A.** Yes, there absolutely would be.

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1 have they been doing daily cash checks; have they been
 2 doing weekly balances; it looks at outstanding
 3 transaction corrections; it may look to see if all of
 4 the transaction acknowledgements have been processed.

5 So it's part of a wider review that is then used to
 6 come to a fair outcome and discuss that with the
 7 postmaster.

8 **Q.** That can come down. Thank you.

9 Could we look, please, at POL00448072. The document
 10 is entitled "Escalation process" on the left. On the
 11 right, the "Process Summary" says:

12 "If a discrepancy has been investigated, this
 13 process shows how it can be escalated if the
 14 [postmaster] does not agree with the decision, or if the
 15 loss cannot established."

16 Then if we go to page 2, please. It says:

17 "The Weekly Case Review will assess the case and
 18 based on the success rate value will make the decision
 19 to escalate the case to Tier 3 or clear the account."

20 What is the "success rate value"?

21 **A.** I think what that's referring to is the fact that there
 22 is a cost, both in resource and time, to escalating and,
 23 if we believe that, actually, as a result of that
 24 escalation, it won't change the outcome of a case, then
 25 we might choose to write that off, rather than take

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1 a postmaster through a further process that we might not
 2 get a different outcome. So we do have the opportunity,
 3 subject to value limits, and also the history of that
 4 branch and, potentially, previous write-offs, just to
 5 take that and, on that occasion, not to progress with
 6 the discrepancy but simply write it off.

7 **Q.** Just so I am clear, if the postmaster's disputing it and
 8 wants to go to Tier 3, is it the case that it could be
 9 refused to be escalated but not written off?

10 **A.** I don't believe -- no, I don't think that's the case.
 11 I think if a postmaster is escalating it, we will always
 12 review the case. We always review all cases, from
 13 a Tier 3 perspective, to make sure that that case has
 14 been carried out consistently and transparently. Once
 15 we've reviewed that, we then make a decision on the next
 16 steps for that case.

17 **Q.** So this escalation policy is, in essence, if the
 18 subpostmaster disputes it, it's going to be escalated?

19 **A.** Absolutely.

20 **Q.** But this is: should it be written off, rather than be
 21 escalated?

22 **A.** Yes, it will go for a review.

23 **Q.** Please could we look at page 63, paragraph 140 of your
 24 statement. You say:
 25 "If a Postmaster disagrees with the outcome of the
 141

1 whether that's -- the review as to whether that's going
 2 to happen, will that be complete before a decision is
 3 made on whether or not Post Office pursues civil
 4 litigation in future against postmasters?

5 **A.** It has to be part of that process, I believe.

6 **Q.** Part of the same process?

7 **A.** Yes.

8 **Q.** Thank you. The NFSP have suggested a three-stage test
 9 for dispute resolution. The first is to ask if the
 10 discrepancy is caused by Horizon; I may be paraphrasing
 11 slightly but the second is, is it a mistake by the
 12 postmaster or assistant; and only then, finally, ask
 13 have Post Office's assets been used in an unintended
 14 manner?
 15 What's your view on that as a framework for dispute
 16 resolution?

17 **A.** I don't think that's dissimilar to the framework that we
 18 operate in now. Part of the review process is to
 19 understand if Horizon has contributed, then we talk to
 20 the postmaster to understand the circumstances, and only
 21 then, with the cooperation of the postmaster, will we
 22 look to resolution of that discrepancy. So I don't
 23 think we're disagreeing there at all.

24 **Q.** I just want to briefly look at another point on types of
 25 escalation, please. It's POL00447943. This document is
 143

1 Tier 3 review, then the postmaster can challenge the
 2 decision by email or phone call to their ... Analyst who
 3 will present the case to the Dispute Resolution
 4 Committee for review ..."

5 At 141, you say:
 6 "If a postmaster disagrees with the outcome of the
 7 Dispute Resolution Committee, there is currently no
 8 further or independent review forum (Post Office is
 9 currently considering the use of an independent panel as
 10 part of reviewing its model for recovering shortfalls
 11 outlined in paragraphs 35 and 36 above)."

12 Has there been any progress with that review in
 13 terms of whether there will be an independent review of
 14 the dispute resolution process at any point?

15 **A.** I think the review is currently underway, so a Working
 16 Group that has been established, and we are looking at
 17 all of the things that need to be true, as part of that
 18 potential recovery process. And an independent review,
 19 or a body that has independent people, maybe postmasters
 20 or former postmasters, whether that should be created to
 21 review these, yes.

22 **Q.** We're going to come to, in a moment, civil recoveries.
 23 At the minute, your evidence is that Post Office isn't
 24 pursuing civil proceedings to recover discrepancies from
 25 postmasters. The inclusion of an independent review, or
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1 titled "Identifying postmaster support needs", on the
 2 left, but the "Process Summary" says:
 3 "During an investigation the advisor may behave
 4 [I think that should be "the advisor may have"]
 5 a suspicion that financial crime may have occurred.
 6 This is the process for referring any such suspicions to
 7 the Central Investigations Unit."
 8 So there's a bit of a mismatch between the process
 9 and aim and what the process describes.

10 What instructions are there in place to
 11 an investigator, in circumstances where they suspect
 12 that there is financial crime; what instructions are
 13 there in place for what the investigator says to the
 14 postmaster before referring it to the Central
 15 Investigations Unit?

16 **A.** So I don't think -- I think the initial triage and the
 17 data collection and analysis would provide evidence that
 18 may be in misappropriation or financial crime. At that
 19 point, the triage form would be completed and it would
 20 be referred to the A&CI team. I don't think at that
 21 point we would have had a conversation with the
 22 postmaster, unless the postmaster has spoken to us, and
 23 suggested that one of their colleagues may have been
 24 involved in the discrepancy.

25 **Q.** I see. So this is done purely to triage and then it's
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1 off to another department --

2 **A.** Absolutely.

3 **Q.** -- who will deal with it from there. That document can
4 come down. Thank you.

5 Please could we look at page 61 of your statement,
6 paragraph 133. I'm just looking at the time taken for
7 investigations. You say that:

8 "The NSRT aims to complete Tier 2 investigation
9 within 20 working days", and go on to say that some take
10 longer.

11 If we look, please, at POL00448229, page 16. Sorry,
12 it's the accounting disputing resolution document again.
13 Page 16, please. If we go to the bottom, please. Here,
14 it says that the Tier 2 investigation is to aim to
15 investigate within ten working days.

16 Has this been overtaken now and it's a 20 working
17 day limit based on your evidence?

18 **A.** I think, if you look at the total time, so all of Tier 2
19 investigations will be quality assessed by either a team
20 manager or a Tier 3 analyst and I think that's part of
21 the process. So I think 20 days is the end-to-end
22 ambition for discrepancy reviews.

23 **Q.** Can we look, please, at POL00448231. This is a paper
24 that you authored on 31 January 2024 for the Group
25 Executive report. If we look at page 3, paragraph 9,
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1 process and being able to resolve where we could. These
2 were a mixture of discrepancies that it was right to
3 take more than 20 days. Because what we shouldn't do is
4 rush discrepancies, and come to an incorrect conclusion.
5 So it's right that some do take longer than 20 days but
6 some were also very historic.

7 My ambition was to -- and I asked for additional
8 resource -- to clear those, and we are getting through
9 and resolving those, as we speak.

10 **Q.** Were you given the resource?

11 **A.** Yes, I was.

12 **Q.** So now, if someone has a case come in to Tier 2, is it
13 likely that it will be resolved within 20 working days?

14 **A.** We're not at the 70 per cent, which is our ambition but
15 we are not far off. But I guess, back to my first
16 point: it's really important that we don't try and chase
17 a service level agreement at the detriment of that
18 investigation, and the outcome for the postmaster.

19 **MR STEVENS:** Sir, that's probably a good time to take our
20 break. We're making good progress, I don't envisage any
21 difficulty finishing.

22 **SIR WYN WILLIAMS:** Fine. Resumption time this afternoon,
23 Mr Stevens?

24 **MR STEVENS:** I'll probably get it wrong again. Shall we say
25 3.35. I just listened to what I heard -- or misheard,
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1 please, "Network Support and Resolution Case Backlog":

2 "The additional Network Support resource has made
3 good progress in reducing the number of outstanding
4 discrepancy cases, with period 9 ending at 588, the
5 lowest for 12 months. The number of cases awaiting
6 triage has also reduced to just over 1,200, the target
7 being to have no case older than the 12 week process."

8 Is there still an issue with the backlog of cases?

9 **A.** I think -- so the backlog is building again, so it's
10 higher than it was then. I think that's caused by
11 a couple of things. So the "auto case create" that
12 I described earlier is really important in identifying
13 those cases a lot quicker. So the cases are getting
14 through the system into that Tier 2 world a lot quicker,
15 and I'd like to think that postmasters are also becoming
16 more aware of their option to review or dispute, and
17 therefore using that button more, and asking for help.
18 I guess what comes with that is, from a resource
19 perspective, there's a lag and we need to understand how
20 we address that.

21 **Q.** In terms of there's a backlog, what impact is that
22 having on the time it takes to complete investigations?

23 **A.** The backlog was historic discrepancies when I first
24 joined. So it wasn't necessarily impacting the new
25 discrepancies that we were pushing through the new
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1 I should say, to my right. 3.35, please.

2 **SIR WYN WILLIAMS:** Fine.

3 **MR STEVENS:** Thank you.

4 (3.18 pm)

(A short break)

6 (3.35 pm)

7 **MR STEVENS:** Sir, can you see and hear us?

8 **SIR WYN WILLIAMS:** Yes, thank you.

9 **MR STEVENS:** I'll continue.

10 We'll have a look now at the postmaster accounts
11 support team. Could we have page 48 of your statement,
12 please, subparagraph (e). You say:

13 "The PAST [which is the Postmaster Account Support
14 Team], which is responsible for initiating contact with
15 postmasters who have escalated disputes using the
16 [Review or Dispute] function but have not contacted the
17 BSC and, following investigation by the BSC and/or NSRT,
18 for arranging repayment plans and write-offs where
19 appropriate with Postmasters."

20 Just a point of clarification. Should the "and"
21 after "BSC" be "or"? So the team is responsible for (a)
22 contacting postmasters who haven't escalated disputes to
23 the BSC but use the Review or Dispute function, and
24 separately, they are also tasked with initiating contact
25 with people who, following an investigation, it's been
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1 found there's a discrepancy?
 2 **A.** No, it's "and/or" because if, following a conversation
 3 with the BSC, we've been able to resolve a discrepancy
 4 at the Tier 1 stage and the postmaster then says, "Oh
 5 yes, I understand, how do I settle?", they may then
 6 close the case and point them in the direction of the
 7 PAST team. Because they've resolved the discrepancy and
 8 the postmaster then wants to understand how to resolve
 9 that.
 10 **Q.** Okay, so "and/or" --
 11 **A.** "And/or" is the right one, yes.
 12 **Q.** That can come down. Thank you.
 13 Why is it that the Postmaster Account Support Team
 14 calls the subpostmaster, if they haven't -- if the
 15 subpostmaster themselves haven't called the BSC, rather
 16 than the BSC or Network Support Resolution Team?
 17 **A.** So the BSC doesn't operate an outbound call facility and
 18 that is something that we are going to look at because
 19 it may be that they are better placed, given that the
 20 knowledge they have of that Tier 1 checklist to do that.
 21 So it's part of an ongoing review. I think where we
 22 don't -- where a branch doesn't call following use of
 23 Review and Dispute, it's really important that we do get
 24 the details from the postmaster or their colleagues
 25 about that discrepancy and, therefore, that -- currently
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1 Comment" written by myself, the "Executive Summary"
 2 would have been the summary created from the internal
 3 Audit Team.
 4 **Q.** Right, so this isn't your words?
 5 **A.** That's their observations following the internal audit,
 6 yes, and then my response is underneath in the
 7 "Management Comment".
 8 **Q.** So you're not speaking to these? Do you not agree with
 9 that terminology?
 10 **A.** No, I think "hindered" is probably a harsh word.
 11 I think the inability to contact postmasters to discuss
 12 the circumstances that the discrepancy might have arisen
 13 in does hinder the investigation process, and that's why
 14 we've looked at the auto case create and starting to
 15 talk to postmasters a lot sooner.
 16 **Q.** Can we please look at POL00448295. I don't propose to
 17 bring up the statement on the screen but, sir, for you
 18 it's paragraph 123(a), so page 57.
 19 You say that:
 20 "The PAST [the support team we were discussing] will
 21 make an outbound call to the postmaster and send them
 22 a letter and statement of their account."
 23 This is in circumstances where a postmaster has
 24 pressed the Review and Dispute button but not called the
 25 BSC. You say, "the call script", and you exhibit them,
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1 the Postmaster Account Support Team, that take that role
 2 in trying to contact the postmasters.
 3 **Q.** Could we look, please, at POL00448322. This is
 4 described in your witness statement as a January 2023
 5 audit report. Could we look, please, at page 3. If we
 6 go to the bottom, this is an "Executive Summary" partway
 7 through. We see this is authored by you. Back to the
 8 top, please. It says:
 9 "The increase in the use of the Review and Dispute
 10 button by postmasters (an increase of 60% [year on
 11 year]) is affecting the work load of the teams and is
 12 having an impact on their ability to respond and resolve
 13 within the desired 10-day time frame ([year to date] at
 14 [period 8] 76% of cases are completed within 10 days)."
 15 You then say later on:
 16 "Whilst the Service and Support teams are adhering
 17 to the redesigned process and control framework and
 18 closing 93% of cases (not all of which are resolved),
 19 achievement of their desired 10-day investigation
 20 completion time frame and ability to recover established
 21 losses is being hindered by PM behaviour and a lack of
 22 business appetite to recover losses."
 23 What do you mean by "hindered by postmaster
 24 behaviour"?
 25 **A.** Can I, sorry, correct something. The "Management
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1 the call script being here.
 2 When we look at this document, it says:
 3 "This script is for outbound calls for
 4 subpostmasters who have settled a negative discrepancy
 5 (or several discrepancies that result in a negative
 6 amount) at Branch Trading."
 7 So is this call script used for subpostmasters who
 8 haven't contacted the BSC as well? So the postmaster
 9 presses the Review and Dispute button, they don't call
 10 the BSC, the Postmaster Account Support Team calls them
 11 and your statement suggests this is the script that's
 12 used; is that correct?
 13 **A.** That's right, yes.
 14 **Q.** Right. If we look, please, at page 2, and if we go
 15 down, please, to "Main conversation", it says "Main
 16 Conversation":
 17 "We need to find out if the postmaster/person in
 18 charge is aware of the reasons for the discrepancies.
 19 "Do you understand the reasons for this/these
 20 discrepancy/ies [then the person's name]?"
 21 "1. If they need more information:
 22 "Talk through their account entries with them,
 23 giving as much information and detail as you can.
 24 "2. If they understand the reason for the
 25 discrepancy:
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1 "I'm glad you understand what happened here [Mr So
2 And So]. We just want to make sure that you were aware,
3 comfortable with the reason for the discrepancy and
4 offer our support if not.

5 "What will happen next is that we will send you
6 a letter with a statement next week so you can see it
7 all for yourself. Give us a call back if you have any
8 questions when you receive it."

9 Now, do you think this is sufficient in the script
10 in directing people for the circumstances in which
11 a postmaster should be asked by Post Office to settle
12 a discrepancy?

- 13 **A.** I think, on review, no, and I think this needs to be
14 included in the work we're doing to give postmasters
15 greater clarity on what their options are, and how we
16 will support them with any discrepancy that they may
17 experience as part of their trading period end or
18 outside of that. So I think we definitely have work to
19 do on being clearer.
- 20 **Q.** So at the minute this document isn't being reviewed for
21 the issues we discussed before, about making it clear
22 the circumstances in which Post Office thinks
23 a subpostmaster should accept a discrepancy, but your
24 evidence is that you will review this?
- 25 **A.** Absolutely, yes.

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- 1 Office expects of postmasters?
- 2 **A.** So I can't talk about historically. I think the work
3 that myself and my team have done to date have probably
4 focused on the bigger initiatives that will improve
5 support to postmasters in order to try and stop
6 discrepancies happening. I think, as part of my
7 preparation for this Inquiry, looking at these letters,
8 the knowledge articles, the pop-up box that we talked
9 about earlier, it became clear to me that we don't do
10 a good job in talking to postmasters about the
11 circumstances of a discrepancy and what support we have
12 available and how we help them and, as part of that,
13 we're looking at all of these documents and what's
14 available via the training -- I think Ms Marshall talked
15 earlier -- to give better clarity. It's part of our
16 ongoing review and continuous improvement that we should
17 never stop doing.
- 18 **Q.** I wanted to look at another part of this letter, which
19 you yourself, in your witness statement, raise.
- 20 Sir, for you -- we don't need to go there -- it's
21 page 81, paragraph 198, if you wish to review it. Could
22 we look at page 3 of the document on screen. So this
23 appears to be a statement of account. It says it's not
24 a demand for payment at the top, and it gives four
25 different types of discrepancy, which I think you

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- 1 **Q.** And similar scripts with similar teams?
- 2 **A.** Absolutely.
- 3 **Q.** In the part of your statement I went to, you also
4 referred to a letter, please, a letter that's sent out.
5 Can I look at that. It's POL00448197. So I think this
6 is an example of an initial letter that's sent out by
7 the team. Over the page, please. We have "Accepting
8 the discrepancy":
- 9 "If, however, you understand and accept the
10 discrepancy, please contact my team on ..."
- 11 It goes on from there.
- 12 Again, is this something that is being reviewed by
13 Post Office at the moment?
- 14 **A.** Absolutely. So discrepancy letter 1 and then second
15 follow-up, I have had a complete overall, they've been
16 signed off and I believe are currently with Accenture
17 because these are auto created as part of our IT
18 systems. So we have to go through Accenture to get them
19 updated and changed but, yes, I appreciate that these
20 aren't as clear or as helpful as they should be and the
21 new ones are much more helpful, give more information
22 around the reasons and the different categories and also
23 where to go for support for each of those.
- 24 **Q.** I asked this question this morning: why is it that these
25 letters and scripts aren't explicitly clear on what Post

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- 1 acknowledge in your witness statement, the
2 classification and type of discrepancy isn't explained
3 to a postmaster receiving this letter.
- 4 **A.** That's right, yes.
- 5 **Q.** In broad terms, an outstanding discrepancy is
6 a discrepancy that the postmaster has previously
7 received a letter about?
- 8 **A.** That's right.
- 9 **Q.** A new discrepancy is a brand new one that's arisen,
10 first letter. A previously agreed discrepancy is where
11 the subpostmaster has agreed that that is a discrepancy
12 for which they are responsible?
- 13 **A.** That's right, yes.
- 14 **Q.** And a disputed discrepancy is where there's an ongoing
15 investigation?
- 16 **A.** Or the investigation has been completed and the
17 postmaster has disputed it.
- 18 **Q.** We see at the bottom there's a statement total, which
19 says £88.13. So the total doesn't distinguish between
20 different types of discrepancies but am I right in
21 saying that, in Post Office's view, the only one that it
22 would seek for subpostmasters to pay back is the
23 previously agreed discrepancy?
- 24 **A.** That's right, yes.
- 25 **Q.** Now, in your statement, you referred that this was under

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1 review and you, just in your evidence earlier, said this
 2 is now with Accenture. Can you help us with how this
 3 has been corrected in new form of the letter?
 4 **A.** Absolutely. So the descriptions that you've just talked
 5 about for each of those four categories will be written
 6 at the side of those. So that will help explain what we
 7 mean by each of those. The statement total will be
 8 removed, because you're right, it shouldn't be on there.
 9 It bears no reference to the individual discrepancy
 10 categories and, actually, if we scroll up, so we can see
 11 the top, we've had feedback previously from, I believe,
 12 the NFSP, but a number of postmaster forums that, whilst
 13 we say this is not a demand for payment, when you open
 14 a letter and see "demand for payment" that is quite
 15 alarming, so what we're also doing is removing that
 16 statement from this account.
 17 **Q.** So it will no longer say at all, "This is not a demand
 18 for payment"?
 19 **A.** And we'll talk what it is in the front covering letters,
 20 which we've just talked about.
 21 **Q.** So the front covering letter, will that explain that it
 22 isn't a demand for payment?
 23 **A.** It will absolutely explain that.
 24 **Q.** That can come down. Thank you.
 25 I want to move to civil recovery, please. Could we
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1 data."
 2 You go on to say that:
 3 "The data that has been identified indicates that
 4 Post Office was successful in obtaining civil remedies
 5 ... against postmasters in fewer than 100 instances
 6 since the Rule 9 start date."
 7 What degree of confidence can you put in that figure
 8 of fewer than 100?
 9 **A.** That information was given to me -- provided to me by
 10 the Remediation Team, so I have no accountability for
 11 any of those existing civil remedies. So I have to take
 12 it on the authority through which it was provided to me.
 13 **Q.** Presumably, then, you're not able to speak to why the
 14 data is in such a way that it can only be said that
 15 fewer than 100 instances have been pursued; is that
 16 correct?
 17 **A.** That's correct.
 18 **SIR WYN WILLIAMS:** I'm sorry, can you remind me what the
 19 Rule 9 start date was, so I've got some idea of the
 20 period?
 21 **MR STEVENS:** Yes. Just so I don't get it wrong, I'll just
 22 double check the Rule 9. It was defined as, "Since Post
 23 Office ceased carrying out prosecutions due to concerns
 24 with the Horizon system".
 25 **SIR WYN WILLIAMS:** So approximately earliest 2013, maybe
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1 look at page 9 of your witness statement, paragraph 21.
 2 You say that:
 3 "... Post Office does not currently have a team (or
 4 any individuals) taking civil enforcement action against
 5 postmasters to recover shortfalls shown by Horizon and,
 6 for the avoidance of doubt, at present no civil
 7 enforcement action relating to any shortfalls is being
 8 carried out against [subpostmasters]."
 9 When was that decision taken?
 10 **A.** My understanding is it was sometime around 2018/19 but
 11 I've had to rely on that fact from other people.
 12 **Q.** Could we look, please, at page 24 of your statement --
 13 sorry I have an incorrect reference there it might be
 14 paragraph 24. My apologies.
 15 Paragraph 24, it's page 10. You're answering
 16 a question about the number of civil claims pursued by
 17 Post Office, and you say you've, I think, completed this
 18 with assistance from people from the Post Office
 19 Remediation Unit. You say:
 20 "... I understand owing to the incompleteness of
 21 records, changes over the years to relevant team(s)
 22 involved in civil enforcement activity and the fact that
 23 many of those individuals no longer work at Post Office,
 24 those informing me have been unable to establish and
 25 assure the source(s), completeness and accuracy of this
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1 a little bit later?
 2 **MR STEVENS:** Yes.
 3 **SIR WYN WILLIAMS:** Fine.
 4 **MR STEVENS:** That can come down, thank you, for the time
 5 being.
 6 Who would be best placed to provide that information
 7 then, if we wanted to --
 8 **A.** My understanding is there has been a witness statement
 9 to confirm that.
 10 **Q.** Can we look, please, at the future status of civil
 11 proceedings. POL00448362. This is described as loss
 12 recovery update. It's exhibited to your statement. Can
 13 you assist for what purpose this document was created?
 14 **A.** This document was created by our interim CEO to talk to
 15 SEG about our current position on loss recovery.
 16 **Q.** So if we turn, please, to page 4, "Options and
 17 Recommendation", we see there's several options listed.
 18 At the top, "Maintain current [position]". If we go
 19 down to 4, please:
 20 "Seek recovery of established losses via a civil
 21 means/deduction from remuneration, following an agreed,
 22 defined process with an external review board that will
 23 take final recovery decision."
 24 The recommendation there is "Yes".
 25 Is that still a current recommendation?
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1 **A.** I think the recommendation was more around proceeding to
 2 understand what options we would have to seek recovery.
 3 What circumstances we would use those options and, as
 4 a result of that, we've set up a working group to review
 5 just that. This isn't necessarily a *carte blanche* to go
 6 ahead and say, "Right, seek recovery". This is signal
 7 of an intent that we need to do more work on.

8 **Q.** Can we look, please, at POL00460458. This is
 9 a Strategic Executive Group report. I think earlier in
 10 your evidence you mentioned SEG; is that --

11 **A.** Yes.

12 **Q.** We see you are the author, 20 May 2024. The title is,
 13 "Postmaster Losses Overview/Branch Discrepancies". Was
 14 this the proposal that's led to the Working Group or was
 15 it a paper that led to a proposal to lead to the Working
 16 Group?

17 **A.** This was an earlier paper. So the discussion about the
 18 extent of losses on our profit and loss account and how
 19 we addressed those losses has been ongoing since
 20 I joined, and this was a paper that I wrote to move that
 21 understanding and that discussion on. It wasn't
 22 necessarily what drove the conversation that that paper
 23 was written for at a later SEG.

24 **Q.** Can we go down, please, to page 2, and down to
 25 paragraph 11, please. It says:

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1 it zoomed out, please, if we can. It says:
 2 "Do not start recovery until clarified Horizon data
 3 used in discrepancy/review process is robust."
 4 Could you just expand on what you meant by that?

5 **A.** I can't remember the timing of it and whether it was
 6 before or after the letter but, obviously, as we've seen
 7 the Inquiry progress, there was -- and based on
 8 conversations that were ongoing with certain criminal
 9 proceedings that I think we've talked about. As one of
 10 the options being civil recovery, I think we'd need to
 11 assure ourselves and anybody else that was involved in
 12 that as to the reliability of the data in Horizon. So
 13 it wasn't just an internal assurance; it was to be able
 14 to go to external bodies and go, "No, we can rely on
 15 that data, and should".

16 **Q.** When it says, "Clarified Horizon data used in
 17 discrepancy/review process if robust", what sort of
 18 assurance would Post Office need on that before it
 19 commences civil recovery in future or, indeed, any
 20 non-voluntary recovery?

21 **A.** In my opinion, and I know this has been looked at, we
 22 need to make sure we've got external expert assurance as
 23 to that data. Given where we've been, and all of the
 24 conversations we've had as part of the Inquiry, I think
 25 it would be important to get some external expert

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1 "The table below summarises the key drivers of loss,
 2 what additional activity is required to improve
 3 prevention of the loss and also recommendations on
 4 whether [Post Office] should start recovery activity on
 5 any of these losses."
 6 We see "Loss Driver", at they top, "Current
 7 [postmaster] discrepancies post-April '21". It says,
 8 "Recommendations for prevention", and then we have
 9 "Recommendations for recovery".
 10 Is that referring to civil recovery as in issuing
 11 civil proceedings?

12 **A.** Not necessarily, no. It was that we have, I guess,
 13 a number of options to seek recovery from postmasters.
 14 So, again, that was looking at those options by which we
 15 would recover other than voluntarily.

16 **Q.** So that would include attachment of earnings, would it?

17 **A.** Yes, an auto deduction from rem, if that was one of the
 18 options that we choose to --

19 **Q.** So it's recovery but not necessarily civil proceedings
 20 but some form of non-voluntary recovery from the
 21 postmaster?

22 **A.** Absolutely, and having options to do that.

23 **Q.** If we can zoom in on that recommendation for recovery
 24 part. It says, the first bullet point, "Do not start
 25 recovery" -- that doesn't assist, I don't think. Leave

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1 assurance for everyone.

2 **Q.** Could we look, please, at POL00448520. This describes
 3 a SEG tactical meeting on 17 July 2024. Does that have
 4 any special meaning, that it's a tactical meaning?

5 **A.** I think it's just the different types of Strategic
 6 Executive Group meeting. I think they had strategic
 7 ones and tactical ones, but ...

8 **Q.** So the paper we just saw before, that was dated May
 9 2024. Was that too old to be considered at this meeting
 10 in 17 July 2024?

11 **A.** I can't recall but this would have been an update on
 12 that position with a view to -- I think that was the --
 13 the May paper was quite a rounded paper, talking about
 14 discrepancies, how they arise, trying to get all of SEG
 15 to a level of understanding, so that they are making
 16 more informed decisions when we come with proposals and
 17 recommendations, and I think, from recollection,
 18 although I can't recall the paper that went with this,
 19 that would have been a more detailed next steps versus
 20 a Teach-In session.

21 **Q.** We see you're not in the "present" line at the very top
 22 but, if we just scroll down slightly, when it comes to
 23 branch grapes, you join the meeting and, if we go
 24 please -- we don't need to read all of it but, if we go
 25 to page 2, there's a discussion about recovering

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1 discrepancies and, towards the bottom of the page, it
2 says:
3 "SEG discussed a number of other alternatives,
4 including:
5 "Some form of 'losses' pool, to which all
6 postmasters contributed and from which repayments would
7 be made."

8 Could you just describe what that proposal was?

9 **A.** So that was something suggested by one of our Legal
10 Team, and --

11 **Q.** Do you know who in the Legal team?

12 **A.** Neil Wallace(?). So he -- I think his opinion -- and
13 again, this is something that we need to look at all
14 options -- was to, if we had a budget for losses and
15 that budget wasn't achieved during any one year, then
16 however much we were short or the benefit we created
17 from not spending all that money on losses would go back
18 to postmasters to try to encourage postmasters to,
19 I guess, run operationally kind of robust branches and
20 seek support for discrepancies when they first saw them.
21 And, as a result of that, our cost in our profit and
22 loss account would be less, which means, ultimately, we
23 would be able to give more remuneration to all our
24 postmasters.

25 **Q.** This reads like the proposal is to say postmasters
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1 it's Post Office's position that it does not recover
2 losses, except where a postmaster agrees the reasons for
3 the shortfall, and now witnesses have said that's Post
4 Office's position; do you accept that?

5 **A.** Absolutely, yes.

6 **Q.** At paragraph 15 of your statement you set out
7 12 postmaster policies, I think you call them a suite of
8 policies, which you say set out the guidelines of how
9 postmasters are supported, and their assistance across
10 number of key areas by Post Office --

11 **A.** That's right.

12 **Q.** -- and it sets out minimum operating standards for Post
13 Office. Are you familiar with these policies, Ms Park?

14 **A.** I'm familiar with all of the policies in general but
15 more familiar with the ones that sit in my area.

16 **Q.** Okay, could we then go very quickly to a section of the
17 policy that Mr Stein took Mr Read to last week, and it's
18 POL00448000. This is the Postmaster Account Support
19 Policy and it's page 8 of 25, section 2.5 "The risk".
20 It's just coming up on the page now. Page 8, please.
21 We can see the second paragraph there, and it says:

22 "Post Office can recover losses from a postmaster
23 when such losses are caused through negligence,
24 carelessness or error and Post Office has carried out
25 a reasonable and fair investigation, as set out in the
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1 contribute to a general pool to make up for losses or
2 discrepancies in Horizon.

3 **A.** That's not my understanding but, again, this will form
4 part of the Working Group conversations and look at what
5 options and alternatives we have.

6 **Q.** So is this losses pool a matter that is actually being
7 still -- sorry, start again. Is the losses pool
8 suggestion under active consideration still?

9 **A.** I couldn't say for certain because I've not been
10 involved in those working groups over the last month or
11 so, so I don't know.

12 **Q.** In summary terms, can you assist at all where the
13 Working Group has got to with next steps, in terms of
14 civil recoveries?

15 **A.** I can't, no, sorry. I've not been involved. I will
16 pick up my involvement again over the next couple of
17 weeks.

18 **MR STEVENS:** Sir, that's all the questions I have. I will
19 look around the room.

20 There's questions from Howe+Co and NFSP.

21 **SIR WYN WILLIAMS:** Right.

22 **Questioned by MR JACOBS**

23 **MR JACOBS:** Hello, Ms Park, I have some questions for you.
24 Simon Oldnall gave evidence yesterday and Tracy
25 Marshall this afternoon gave evidence and confirmed that
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1 Postmaster Accounting Dispute Resolution Policy ..."
2 Just pausing there, Mr Stevens took you to that
3 policy earlier on this afternoon, just before 3.00 and
4 this is the Tier 2 investigation and the Tier 3
5 investigation?

6 **A.** That's the fair -- reasonable and fair investigation
7 that that piece refers to.

8 **Q.** In Tier 2, one of nine actions that can be taken within
9 an investigation is to undertake a check on the Horizon
10 system information to ascertain whether Horizon was
11 a contributory factor in the discrepancy; is that right?

12 **A.** That's right, yes.

13 **Q.** Tier 3 sets out five contractual thresholds, and one of
14 those, one of those five, is that the Horizon system
15 information has been checked to ascertain whether the
16 Horizon system was a contributory factor to the
17 discrepancy. So part of the investigation but there is
18 an investigation into a shortfall?

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

20 **Q.** So going back to the text of the policy, so Post Office
21 can recover the losses, carry out a reasonable
22 investigation, as set out in the other policy, the
23 resolution policy, as to the cause and reason for the
24 loss, and going over the page:

25 "... whether it was properly attributed to the
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1 postmaster. Postmasters are also responsible for losses
2 caused by their assistants."

3 So we can take that off the screen now. Thank you.

4 Do you accept, in principle, there is scope within
5 the policy, this policy, for recovery based on Horizon
6 shortfall?

7 **A.** I think that, if we're talking about a shortfall, it
8 will be linked -- the way a shortfall is identified is
9 by doing a full count of cash and cash equivalents in
10 a branch and comparing that to Horizon data. So if we
11 are -- what Horizon expects the value to be in that
12 branch. So I think if we're talking about shortfalls,
13 they will all be linked back to Horizon because that's
14 the operating system that we check back to.

15 **Q.** Okay. So you do accept, I think, is your answer, that
16 there can be recovery based on a Horizon shortfall under
17 the policy?

18 **A.** Yes.

19 **Q.** The concern that our clients have -- and we represent
20 some current subpostmasters, as well as many, many
21 subpostmasters who were affected by the scandal and
22 their concern is -- and we put this to Ms Marshall
23 earlier -- that the Post Office's policies do not
24 reflect Post Office's expressed intent and the evidence
25 that the witnesses have given in this Inquiry. If it's

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1 the door open and goes out for the day, perhaps that's
2 different.

3 But the position that the Post Office has accepted
4 in this Inquiry is that post offices do not recover
5 shortfalls unless the postmaster agrees with the reasons
6 for the shortfalls. That's not what is said in the
7 policy. Do you accept that the policy should reflect
8 Post Office's position, the position I've just
9 articulated -- and you can say something about other
10 extraneous factors, like leaving safe doors open and
11 going out for the day, but you're not being clear in the
12 policy, are you?

13 **A.** I think we could be more overt with our current position
14 in the policy and in some of the communications that we
15 have with postmasters during the investigation process.
16 You're right.

17 **Q.** Our position is that the policy should be reviewed; do
18 you accept that it should be reviewed --

19 **A.** Absolutely --

20 **Q.** -- and changed?

21 **A.** -- and we will take that, definitely.

22 **Q.** Will subpostmasters be entitled to comment on the
23 Postmaster Account Support Policy and Accounting Dispute
24 Resolution Policies before they're finalised?

25 **A.** I think we referred to that -- Ms Marshall referred to

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1 the position that Post Office does not recover Horizon
2 shortfall losses, except for when a subpostmaster agrees
3 to repay those losses and starts to repay, why doesn't
4 the policy say that? The policy seems to say something
5 completely different and opposite.

6 **A.** I think my understanding is that the policies, as well
7 as the contract, should include the opportunity, such
8 that, if the circumstances are shown that the shortfall
9 is a result of negligence, carelessness or error and we
10 do have situations where, actually, Horizon data isn't
11 involved, where we've spoken to the postmaster and, for
12 example, a safe has been left open, or they haven't been
13 doing regular cash decs and couldn't identify -- and
14 haven't been running their branches in an operationally,
15 I guess, sound way, where cash has fallen into the bin.

16 So we should have that opportunity in our policies
17 and contracts such that, when we're confident that all
18 of the support is in place and we're doing all of the
19 things we should be doing -- we're doing the right
20 training the right interventions -- we should have that
21 opportunity and, therefore, I do believe it's right to
22 have it in there, but I understand why, at the moment,
23 we're not necessarily fulfilling that opportunity to its
24 full extent.

25 **Q.** Of course. Yes, if someone leaves a safe open or leaves

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1 that earlier. So absolutely.

2 **Q.** Super. I've now got one other line of questioning for
3 you. We asked Ms Marshall this morning about
4 Mr Patterson's letter to Mr Read, dated 17 May 2024.
5 Are you familiar with that letter?

6 **A.** I am, yes.

7 **Q.** It's well known to the Inquiry now. It's worth saying
8 that it says in the second paragraph:

9 "To be clear, Fujitsu will not support the Post
10 Office to act against subpostmasters. We will not
11 provide support for any enforcement actions taken by
12 Post Office against subpostmasters, whether civil,
13 criminal, for alleged shortfalls, fraud or false
14 accounting."

15 Now, I should say at this stage, before I ask you
16 a question, that I have looked at the fifth corporate
17 statement of Mr Patterson, and the reference -- we don't
18 need to call it up for the Inquiry -- is WITN06650500.
19 At paragraph 66 and 67 of that statement, Mr Patterson
20 states that Fujitsu does continue, when contractually
21 bound to do so, to provide ARQ data but Fujitsu has
22 sought to put in place processes to ensure that any ARQ
23 data it provides is not used in enforcement action
24 against postmasters, and one of the things that Fujitsu
25 is seeking to do is require Post Office to confirm, when

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1 requesting ARQ data, whether it is to be used for
2 redress of subpostmasters or investigation into or
3 actions against a postmaster or member of a branch
4 staff.

5 So with that caveat, it's right, isn't it, that
6 Fujitsu are not going to cooperate by assisting or do
7 not intend to cooperate to assist Post Office in taking
8 any sort of enforcement action against postmasters; do
9 you accept that?

10 **A.** I accept that that's the letter, but --

11 **SIR WYN WILLIAMS:** Well --

12 **MR JACOBS:** Sir, I see that you're --

13 **SIR WYN WILLIAMS:** The letter speaks for itself. I think
14 this witness is incapable of giving an answer other
15 than, "The letter speaks for itself."

16 **MR JACOBS:** Indeed. I'll move on. I just wanted to clarify
17 that point with her.

18 My question to you is: how can Post Office fully
19 investigate without this assistance, without this data?

20 **A.** So, I -- the data, as it exists at the moment sits in
21 HORice and Credence, and that's the data we used to
22 investigate. I find it quite alarming that the provider
23 of an EPOS operating system is not assured of the
24 reliability of the data that is in that system. But we
25 don't need Fujitsu's cooperation because the data exists

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1 conversation.

2 **MR JACOBS:** Thank you. I'm just going to ask if I have any
3 more questions for you. No, I haven't.

4 That's all I have, sir.

5 **THE WITNESS:** Thank you.

6 **SIR WYN WILLIAMS:** Yes. Ms Watt.

7 **Questioned by MS WATT**

8 **MS WATT:** Thank you, sir.

9 Good afternoon, Ms Park, we have this perennial
10 issue of just being able to see each other. Thank you,
11 it's just the location of the desks.

12 I just want to ask you a couple of questions to
13 check in with some of the matters you raise in your
14 witness statement.

15 I'm asking questions on behalf of the NFSP. Sorry,
16 I should have said that at the beginning.

17 I'm not going to call up these documents; I'm just
18 going to make some general summaries and ask some
19 questions. At paragraph 17 of your witness statement
20 you say, in relation to the 12 postmaster policies:

21 "Prior to submission to ARC [that's the Audit and
22 Risk Committee] each policy is reviewed and agreed with
23 the National Federation of SubPostmasters, NFSP, with
24 feedback also obtained from the Postmaster Experience
25 Director, who is a serving postmaster working within the

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1 in our systems and that we -- we use that data as part
2 of the investigation.

3 **Q.** My final question for you then is that Fujitsu doesn't
4 consider that the Horizon system should be used to
5 evidence shortfalls. Do you accept that that is right:
6 the Horizon system should not be used to support
7 recovery action against subpostmasters?

8 **A.** I don't accept that but I understand we should seek to
9 do some external assurance on that and I find it quite
10 confusing that that data could be used for remediation
11 but not to support a review of how a discrepancy might
12 have arisen.

13 **Q.** Well, I put this to Ms Marshall. The confusion
14 shouldn't really be confusing, it's because of the great
15 scandal that's taken place, isn't it? It's because of
16 what's happened in the past and how Post Office have
17 used Horizon data to oppress subpostmasters; that's why
18 things have changed.

19 **A.** And things have changed, so my opinion is that how we
20 support and review discrepancies with postmasters now is
21 not the same as what we -- how we did in the past, which
22 was awful. So I don't see the data being called into
23 question, because of the processes that we follow, to
24 assure ourselves but I do understand. I think we get --
25 that external assurance would help everyone in this

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1 Post Office. One of Post Office's Postmaster
2 Non-Executive Directors will also approve new policies
3 as a core member of ARC."

4 In his witness statement -- and I'm not calling it
5 up but for the Inquiry's record, WITN003700100 -- Calum
6 Greenhow of the NFSP says, at paragraph 326 that the
7 NFSP raised concerns about the audit reporting script,
8 suggested an alternative script. He also says that the
9 NFSP suggested a checklist for the postmaster and the
10 officer in charge to follow, given the potential
11 stressful situation that may be being dealt with at the
12 time but he says these suggestions were rejected by the
13 Post Office.

14 So the first question I wanted to ask you was: would
15 you agree that the policies you've been referring to
16 are, therefore, reviewed by the NFSP but are not always
17 agreed in full by them and that changes proposed by the
18 NFSP are not always taken on board?

19 **A.** I couldn't comment on that because that's not part of
20 the process that I'm then accountable for.

21 **Q.** Okay. It might be that the following question you can't
22 answer either, and that's fine. Just say if you can't.

23 But in that paragraph 17 of your witness statement,
24 where you are setting all of this out, you list three
25 potential sources of postmaster feedback on Post Office

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1 policies: that that's the Postmaster Experience
2 Director; the Postmaster Non-Executive Director; and the
3 NFSP. So if I think about an example, you've got three
4 different sources of feedback and approval. Let's say,
5 for example, the Postmaster Experience Director agrees
6 with the policy that's being brought forward but the
7 NFSP and the Postmaster Non-Executive Directors don't
8 agree in full with it. Is it the case that the
9 agreement of the Postmaster Experience Director allows
10 the Post Office to say they've received postmaster
11 feedback and approved the policy?

12 **A.** Again, because I'm not accountable for that review
13 process, I'm sorry, I can't comment.

14 **Q.** Okay. I think, just picking up on that, this may also
15 not be -- you can tell me if it's not -- but would you
16 agree that what I've just described actually suggests
17 that the Post Office effectively has a number of bites
18 at the cherry to get the answer it needs on approval?

19 **A.** Again, I can't comment.

20 **Q.** Okay. At paragraph 80 and 81 of your witness statement
21 you discuss the Operational Excellence Project; is that
22 something you are familiar with?

23 **A.** That's something I'm familiar with, yes.

24 **Q.** Okay. You say the objective of the policy is to review
25 and improve the operational support provided to

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1 **Q.** -- so perhaps you might be able to comment on my
2 follow-up questions.

3 Would you agree that it is not sufficient,
4 ie 5 per cent of this remuneration is not sufficient,
5 when postmasters across the UK report in the NFSP
6 surveys and the postmaster surveys, or the Post Office
7 surveys and the YouGov survey for this Inquiry, that low
8 remuneration is the biggest issue they face, and that
9 5 per cent of not very much is, in fact, not very much?

10 **A.** I understand the feedback about low remuneration,
11 absolutely. With relation to the Operational Excellence
12 Incentive, my understanding was that that 5 per cent
13 wasn't intended to cover the full costs of all of those
14 back office processes, my understanding is there's
15 an element of the admin process fed into each of the
16 individual rem payments for the products, and this was
17 simply a way to encourage postmasters to complete the
18 back office processes that we asked them to do as part
19 of the contract in running their branches. But
20 I understand the feedback about the rem in general, yes.

21 **MS WATT:** Thank you. Those are my questions.

22 **SIR WYN WILLIAMS:** Thank you, Ms Watt.

23 Is that it, Mr Stevens?

24 **MR STEVENS:** Yes, sir. That is it.

25 **SIR WYN WILLIAMS:** Well, then, thank you very much, Ms Park,

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1 postmasters during each stage of their journey with the
2 Post Office.

3 **A.** Absolutely.

4 **Q.** You have a number of subparagraphs in that, but
5 subparagraph 81(d) is about operational excellence
6 incentive to encourage improvements in back office
7 processes in sub post offices and you talk about
8 a financial incentive for the subpostmaster meeting
9 targets on, for example, daily cash declarations and
10 completing monthly trading within a certain period.
11 That financial incentive is a payment of 5 per cent of
12 the postmaster's total variable remuneration for the
13 month.

14 Now, I wanted to ask if you were aware that the NFSP
15 did not agree that 5 per cent of a postmaster's total
16 variable remuneration was sufficient?

17 **A.** So whilst I have responsibility for the overall
18 Operational Excellence Programme, postmaster
19 remuneration isn't part of my accountabilities and that
20 sits with another member of the retail leadership team?

21 **Q.** So you're not aware specifically of the NFSP --

22 **A.** *(The witness shook her head)*

23 **Q.** However, I think you said earlier you were
24 an accountant, if that's correct --

25 **A.** Yes.

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1 for making a witness statement on behalf of the Post
2 Office which is very detailed, and thank you very much
3 for expanding upon it in your oral evidence this
4 afternoon. I'm grateful to you.

5 **THE WITNESS:** Thank you, sir.

6 **SIR WYN WILLIAMS:** Right. We'll resume again at 10.00
7 tomorrow morning.

8 **MR STEVENS:** Yes, sir. Thank you.

9 **(4.28 pm)**

10 **(The hearing adjourned until 10.00 am the following day)**

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