

Witness Name: Sarah Munby
Statement No.: WITN11520200
Dated: 2 October 2024

POST OFFICE HORIZON IT INQUIRY

SECOND WITNESS STATEMENT OF SARAH MUNBY

I, Sarah Munby, will say as follows.

Introduction

1. I make this statement in response to the Inquiry's Rule 9 request for evidence dated 26 July 2024. I have prepared it with the support of the Government Legal Department and counsel. I served as Permanent Secretary to the Department for Business Energy and Industrial Strategy ("**BEIS**" or "**the Department**") from 20 July 2020 until 6 February 2023. I am presently the Permanent Secretary at the Department for Science, Innovation and Technology ("**DSIT**").
2. This is my second witness statement to the Inquiry. My first witness statement, dated 13 September 2024, concerned Henry Staunton's removal as Chair of Post Office Limited ("POL") and the false allegations he subsequently made about a meeting I had with him in January 2023. I understand that statement has been given the reference **WITN11520100**.

3. In this second statement, I set out my reflections on the adequacy and effectiveness of POL's corporate governance arrangements, the culture of POL, and the arrangements for and delivery of compensation and redress to subpostmasters ("SPMs"), as they relate to my tenure as BEIS Permanent Secretary. As I stated in paragraph 4 of my first statement:

"I anticipate that my second statement may be of broader interest to the Inquiry. In that statement I am keen to provide as helpful a perspective as possible on the ongoing work to provide redress for the terrible injustices which had been suffered by postmasters, and work to reform POL and HMG to ensure similar events could never happen again. Understanding the extent to which redress and reform have been effective and how they could be improved is a vital part of learning from what has happened."

Background

4. In paragraphs 5-8 of my first witness statement, I describe my professional background and role as Permanent Secretary in the following terms:

"5. My background before Government (apart from a brief stint as a junior civil servant after leaving university) was as a management consultant, where I worked for McKinsey for 15 years. At the time I left McKinsey I was a Partner, leading the firm's strategy and corporate finance practice in the UK and Ireland. I re-joined the Civil Service when I was appointed as a Director General in BEIS in July 2019. I stayed in that role until 19 July 2020 when I was appointed as

*Permanent Secretary for BEIS (this was in the midst of the Covid pandemic). I remained as Permanent Secretary at BEIS until 6 February 2023 when I moved to the Department for Science, Innovation and Technology as Permanent Secretary. This followed the Machinery of Government change that dissolved BEIS and created several new Government Departments in its place. At that point, responsibilities for POL were passed from BEIS to the new Department for Business and Trade (“**DBT**”) and I ceased to be the relevant Permanent Secretary.*

6. As Permanent Secretary at BEIS I was the Civil Service head of the Department with overall responsibility for its management and leadership. I was personally responsible for the effective stewardship of Departmental resources as Principal Accounting Officer, accountable to Parliament for Departmental expenditure. The Civil Service team in the Department aims to support Government in achieving policy objectives and ensure the effective running of the Department. As Permanent Secretary I held primary responsibility for that Civil Service team.

7. During my tenure as Permanent Secretary of BEIS, the Department consisted of around 6,000 civil servants in the core Department divided into 9 Director General-led Groups with an overall Departmental budget of about £30bn per annum. The Department was responsible for over 40 Public Bodies including (among many others) UK Research and Innovation, the Nuclear Decommissioning Authority, the Met Office, and Companies House. Our responsibilities included supporting businesses through the Covid-19

pandemic, overseeing the UK's energy transition and net zero strategy, managing the majority of HMG's Research and Development funding, and administering schemes to support energy bills in the aftermath of Russia's invasion of Ukraine.

8. Day-to-day Departmental matters concerning POL were handled by a team of officials that formed part of the Business Resilience Directorate headed by Carl Creswell, Business Resilience Director, then to the relevant Director General, and through them to me."

6. It is worth briefly situating my tenure as Permanent Secretary in the wider context of the Post Office. At the time I became Permanent Secretary in July 2020 the HMG Independent Review [Horizon Review: Progress Update submission, dated 29 July 2020] (**BEIS0000952**) had just been launched (before being converted into a statutory inquiry during my tenure); Nick Read was the CEO of POL (Paula Vennells having left in 2019); the GLO settlement had taken place; the Historical Shortfall Scheme had just opened; and although the first postmaster convictions had not yet been overturned by the courts, 47 cases had been referred for appeal. At the point I left BEIS in March 2023, the HSS scheme had made offers to 95% of claimants; redress payments had started to those with over-turned convictions; the GLO scheme was in the process of launching; HCRS had not yet been launched; and the Post Office (Horizon System) Offences Bill had not yet been introduced. My commentary only applies to this period – I did not remain involved after I left my role at BEIS.

Initial briefings

7. The Inquiry has asked me whether I received any relevant briefings before or at the time of my appointment as Permanent Secretary of BEIS on 19 July 2020.

8. During my time as Director General in the Department, I was copied into a range of documents that related to POL. This included updates from UKGI in respect of the Horizon Litigation from around September 2019 [Email from Tom Aldred to PO, Perm Sec, dated 19 September 2019 RE Post Office litigation: Appeal update] (**UKGI00024240**) and an email in September 2019 to the Permanent Secretary (Alex Chisholm) which attached a briefing [Briefing Note: Introductory Meeting with Nick Read, CEO of POL, 30 Sept 2019] (**UKGI00016309**) for a meeting between Alex Chisholm and Nick Read, POL's CEO, and POL's Quarterly Update [Email from PO Policy and Sectors Briefing Hub to PS, dated 26 September 2019] (**BEIS0000955**). Those documents provided me with an overview of the current issues arising in respect of the Horizon Litigation and the work of the Criminal Cases Review Commission ("**CCRC**").

9. I was copied on some further updates (including on the referral by the CCRC of a number of cases to the Court of Appeal) during the rest of 2019, and then on 14 May 2020, I was copied into a submission summarising issues associated with the Horizon Litigation which included introductory details on the HSS [Briefing to Secretary of State and Minister re POL Group Litigation background and latest status, dated 14 May 2020] (**BEIS0000956**).

10. This history meant that when I was appointed as Permanent Secretary, I did not receive an “introductory briefing” as such, given I was already aware of many of the points of background and recent events. However, almost immediately after becoming Permanent Secretary, I was provided with a Quarterly Update for POL [Submission on Post Office Limited (POL): Quarterly update dated 21 July 2020] (**BEIS0000957**) on or shortly after 21 July 2020.

11. On 1 September 2020, I attended a meeting with both POL and Minister Scully which concerned, in the main, POL’s approach to the cases of SPMs with convictions which were at that time in the process of being appealed [Email from Joshua Scott to Scully, Minister (Private Office), Permanent Secretary, SpAds Office (Private Office) RE: POL - SoS/Minister Scully/Lord Callanan/SPADs - 1 Sept Meeting dated 28 August 2020] (**BEIS0000958**) [Update on POL Post-GLO Litigation, dated 1 September 2020] (**BEIS0000959**); [Post Office Ltd. (POL) – Update to BEIS on POL Litigation dated 1 September 2020] (**UKGI00013178**); [Email from Minister Scully to Scott, Joshua - UKGI, Callanan, Minister (Private Office), Permanent Secretary, SpAds Office (Private Office) dated 8 September 2020 RE: [OFF:SEN] RE: POL - SoS/Minister Scully/Lord Callanan/SPADs - 7 Sept Meeting] (**BEIS0000961**). This followed the 3 June 2020 decision of the CCRC to refer the convictions of 47 SPMs to the Court of Appeal. The meeting therefore concerned how POL would respond to these referrals – acknowledging a very substantial liability for POL and HMG that could reach towards £1billion.

12. At the time, I felt appropriately briefed. The materials appeared thorough and of sensible quality. I was aware that very serious failings at POL had led to terrible injustice and suffering for postmasters; that the work of providing redress had only just begun and was going to expand hugely; and that POL had started (for example by proposing the creation of postmaster NEDs), but not completed, the necessary organisational change.

13. With hindsight, I have two additional reflections. First, that the briefings were (perhaps unsurprisingly) typical Civil Service briefings, focused on the facts and next steps. I couldn't honestly say that they brought home the ongoing human tragedies at the heart of this case, and with hindsight I think I should have personally pushed to meet with postmasters myself. Second, I am not sure these briefings emphasised sufficiently the ongoing cultural challenge at POL.

POL's corporate governance and oversight

14. The Inquiry has asked me to set out my reflections as to the adequacy and effectiveness of POL's corporate governance arrangements and the adequacy and effectiveness of the Department's and UKGI's oversight of POL, during my tenure as Permanent Secretary at BEIS between 19 July 2020 and 6 February 2023. I address these issues in turn.

The adequacy of POL's own corporate governance arrangements

15. As a Public Non-Financial Corporation (“Public Corporation”), POL had a properly constituted Board of executive and non-executive directors who were responsible, both legally and in practice, for the corporate operations of POL. (One of the members of this Board was a government representative; the other non-executives were appointed by the Secretary of State.) They were required to fulfil their duties as officers of the company in accordance with their legal duties and in line with corporate governance principles. POL’s Board of directors was accountable to the Secretary of State as sole shareholder for the performance of POL and was required to seek their consent in respect of certain matters as dictated by POL’s Articles of Association. Nick Read, POL’s CEO during my tenure, was POL’s Accountable Officer. As set out in POL’s Shareholder Relationship Framework Document [Post Office Limited - Shareholder Relationship Framework Document] (**UKGI00010387**), it was his responsibility to safeguard POL’s funds and ensure that POL was run on the basis of standards of governance, decision-making and financial management as set out in Managing Public Money [Managing Public Money (May 2021 version)] (**POL00413475**) and to ensure that audits were used to improve internal controls and performance. He was responsible for the day-to-day operation and management of POL.
16. These are structurally sensible governance arrangements, broadly in line with what you would expect to see in other corporate settings. Of course, though, the effectiveness of Board level governance in any corporation depends on the implementation of this structure, including both the quality of the Board itself (mix, skills, culture of challenge and so on); and the quality of the relationship between the Board and the Executive (candour, respect and so on). It is failings in these

kinds of areas that had allowed the Board to make earlier severe governance failings that so strongly contributed to this scandal.

17. During my tenure, the POL Board had a large number of hard-working and well-meaning members, and I think had learned from past failings. The Board was significantly strengthened (with support from BEIS) by the appointment in 2021 of two postmaster representatives and a dedicated Legal NED. However, there was not a clean slate of good governance during my tenure. I give two examples below.
18. The first example concerns how the Board responded to what had been a much earlier governance failure. Soon after I began as Permanent Secretary I wrote (in line with Ministerial wishes) to Tim Parker (then Post Office Chair) formally censuring him for not disclosing the Swift Review to POL's Board in 2016 [Letter to Tim Parker from Sarah Munby dated 7 October 2020] (**POL00104180**). This was a significant error of judgement by Mr Parker, which contributed to the slow recognition of the very serious problems identified by Jonathan Swift QC. After learning of this, and giving consideration to whether we should advise Ministers to fire Mr Parker, formal censure was chosen as the appropriate course of action. We took this decision in part on the advice of Ken McCall, POL's Senior Independent Director, who had consulted the rest of the POL Board and viewed dismissal as "*unfair/disproportionate*" given Mr Parker had been a "*strong force for positive change*" [Email from Sarah Munby to Creswell, Carl (Professional Business Services, Retail & Post Directorate), Cooper, Tom - UKGI, Watson, Richard - UKGI, Mark Russell, Donald, Charles – UKGI dated 27 August 2020 RE: Highly confidential. POL Litigation/Governance] (**BEIS0000963**); [Email from Carl

Creswell to Putt, Lily - UKGI, Cooper, Tom - UKGI, Watson, Richard - UKGI, Mark Russell, Donald, Charles – UKGI dated 3 September 2020 RE: Highly confidential. POL Litigation/Governance] (**UKGI00045960**); [Email from Tom Cooper to Donald, Charles - UKGI, Mark Russell, Watson, Richard - UKGI, Creswell, Carl (Professional Business Services, Retail & Post Directorate), Munby, Sarah (BEIS) dated 16 September 2020 re POL Litigation/Governance – Confidential] (**UKGI00012703**). With the benefit of hindsight it was perhaps the wrong decision not to take the harsher course of action and terminate Mr Parker's appointment (in light of the serious consequences of Mr Parker's mistake), even though it would have been very destabilising for POL at what was a critical moment. Ultimately responsibility for this decision must sit with me and Ministers, but I also think Mr McCall and the POL Board gave HMG the wrong advice, reflecting some remaining level of group-think and conservatism.

19. The second example concerns how the Board interacted with BEIS and the POL executive over pay. POL's Remuneration Committee acted in breach of their responsibility by making a CEO Short-term Incentive Plan payment without appropriate approvals from HMG [Briefing Note - 20221027 Sarah Munby call with Lisa Harrington] (**BEIS0000966**). The Chair of the committee had to write to me making a formal apology [Letter to Sarah Munby from Lisa Harrington dated 4 October 2022 Re: Letter of Apology] (**BEIS0000967**) and also came to my office to apologise in person [Email from Rajeswaran, Siv – UKGI to Permanent Secretary, Gourlay, James – UKGI dated 25 October 2022 OSCOMMERCIAL Briefing Note - 20221027 Sarah Munby call with Lisa Harrington] (**BEIS0000968**); [Email from Permanent Secretary to Siv Rajeswaran, David Bickerton, Carl

Creswell and others re Sarah Munby call with Lisa Harrington, dated 28 October 2022] (**WITN11520201**). This was a relatively less significant process failure in the grand scheme of what the Inquiry is investigating, but I mention it here as it cannot be considered a sign of fully robust governance at POL and was unusual in my experience of working with large numbers of Arm's Length Bodies.

20. Overall, like many aspects of POL's performance during this time, I think POL's internal governance was very much improved, but still not fully adequate.

The adequacy and effectiveness of the Department's and UKGI's oversight of POL

21. The POL Board itself was primarily responsible for the oversight of POL. As sole shareholder, the Department was (alongside UKGI) providing a "second line" of assurance. The Secretary of State had a number of levers to influence POL including: the ability to withhold consent to the appointment and removal of Board members and the CEO; the ability to influence Board decisions through a representative on the Board; the ability to provide or withhold public funding to POL; the ability to veto individual expenditures over £50m; and the ability to approve the Strategic Plan of the organisation. From early 2020, the Secretary of State also had a power to issue directions to POL [Articles of Association of Post Office Limited] (**UKGI00016507**).
22. Although it is true that Ministers and the Department should and must take an active interest in matters involving an ALB like POL, there is nothing inherently wrong about using an independent Board to provide primary oversight. A

Department running an organisation like POL directly would be very hard to imagine given the scale, complexity and nature of decision-making required; and creating too many opportunities for the Department to intervene in operational matters has a tendency to both politicise and to gum-up what should be operational decisions taken by properly qualified people. This is why Arm's Length Bodies exist.

23. However, while ALB arrangements are (by design) supposed to limit the ability of Ministers directly to influence the day-to-day operations of organisations they are responsible for, in the case of POL this certainly created challenges as I will go on to discuss.
24. Historically, I understand from the record, there had been serious inadequacies in HMG's oversight of POL. By the time I took over, I do think much of this had been addressed. A dedicated POL policy team had been created in the Department, led by a full-time member of the Senior Civil Service, and closely overseen by Carl Creswell, Director of Business Resilience. We had a Minister leading on Postal Affairs spending very significant time on the Post Office, who (for example) met monthly with the CEO. We had an engaged and activist Board representative in Tom Cooper. I certainly spent more time on POL issues myself than I did on any other one of BEIS's more than 40 ALBs.
25. Insofar as there were governance challenges during this period I do not think they related to a lack of interest or involvement on the part of HMG (perhaps in contrast

to what had happened earlier during the initial scandal itself). For this reason, I did not make any substantial changes to these structures.

26. I think the hard part tended to be actually getting POL to do what Ministers wanted. As described above, the Department did, from 2020, have a power to issue directions to POL, but Ministers could not routinely become involved in the nuts and bolts of operational decision making. Fundamentally altering the ALB structure would have caused different, but likely equally (or more) profound, problems.
27. A good example to illustrate this would be our efforts to get POL to tighten up its management of legal costs. As I explained in my first witness statement, we had an ongoing push to get POL to better forecast and control the amount of money it was spending on lawyers. On 28-29 September 2021, Minister Scully and I approved the decision to withhold planned Network Investment and Network Subsidy payments of £64m and £12.5m from POL on the basis that POL's management and control of its litigation costs was not adequate [Email from Desai, Meet – UKGI to Permanent Secretary dated 23 September 2021 re Post Office - withholding funding] (**BEIS0000970**); [Network Investment and Subsidy Payments due to POL by BEIS] (**BEIS0000971**); [Email from Desai, Meet – UKGI to Permanent Secretary, Submissions Distribution List dated 27 September 2021 re OFF-SEN COMMERCIAL: Post Office Limited (POL) - funding delay from BEIS to POL] (**BEIS0000972**); [Email from Scully, Minister (Private Office) to Permanent Secretary dated 29 September 2021 re FW: OFF-SEN COMMERCIAL: Post Office Limited (POL) - funding delay from BEIS to POL] (**BEIS0000973**); [Email

from Permanent Secretary to Desai, Meet - UKGI, Submissions Distribution List dated 29 September 2021 RE: OFF-SEN COMMERCIAL: Post Office Limited (POL) - funding delay from BEIS to POL] (**BEIS0000974**); [Letter to Nick Read from Sarah Munby dated 29 September 2021 Re Post Office: Budget 2021/22] (**BEIS0000975**). This was a difficult choice to make, given POL's challenged financial picture, but instruction had not got us far enough. It's also interesting to note that at the time there was in fact a theoretical legal risk that by doing this BEIS was over-reaching its powers in relation to POL, further emphasising the comparative lack of potency we had. This process did result in the introduction of cost controls, and the payments were released in February 2022 [Email from Barnett, David – UKGI to Permanent Secretary, Submissions Distribution List dated 11 March 2022 re [OFFICIAL COMMERCIAL] Submission on Release of POL withheld funding] (**BEIS0000976**); [Post Office Limited ("POL") Budget For 2021/22 And Release Of Network Subsidy And Network Investment Funding dated 11 February 2022] (**BEIS0000977**). Yet by December 2022 I was writing to the new Chair Mr Staunton, asking him to ensure "*effective management of legal costs*" [Letter from Sarah Munby to Henry Staunton re Strategic priorities for 2022/23] (**BEIS0000987**). For these kinds of important but ultimately operational matters, if POL did not do as we asked we had relatively few levers with "teeth" other than ones that had other issues (like removing the Chair or pushing the organisation into financial trouble).

28. More governance and assurance is not always better governance and assurance, and I would acknowledge that while we may have sometimes felt it hard to get messages across, at times POL felt the Department was overbearing and

bureaucratic. (For example, the CEO reported this in regard to BEIS's involvement in compensation governance in October 2022 [Briefing for Perm Sec for Nick Read meeting - 17th October 2022] (**BEIS0000978**). I don't agree, but it is a good illustration of the challenges of just putting ever tighter layers of governance and more approval points upon things – one really good and effective layer would of course be better.

POL's culture

29. Aside from the Department's and UKGI's collective ability to provide adequate and effective oversight of POL's culture and leadership, I have been asked by the Inquiry about my understanding of the culture of POL .
30. Given the role I played, my exposure to the detail of POL's culture (within the organisation and at Executive and Board level) was fairly indirect, and my observations should be taken in that context.
31. At Executive level, POL was unstable in the lead up to and during this period [Annex B: Personnel changes in POL's Board and Group Executive over the last 3 years] (**BEIS0000979**). Changes had included the departure of Paula Vennells, her interim replacement by Alisdair Cameron in April 2019, and then permanent replacement by Nick Read in September 2019. Most of the Executive team were new as of 2020 (reflecting a need to change over roles given all that had happened) and I think there were a number of further

changes during the time I worked with POL, although the majority of my personal interactions were directly with the CEO, Nick Read.

32. BEIS and UKGI spent an unusual amount of time dealing with executive compensation matters at POL. Both Tim Parker and subsequently Henry Staunton were concerned about key executives leaving if we did not pay them more, particularly Nick Read [Email from Cooper, Tom – UKGI to Emerson, Edward - UKGI, Gourlay, James - UKGI, Rajeswaran, Siv – UKGI dated 26 August 2021 FW: OFFICIAL SENSITIVE PERSONAL: Nick Read, Post Office] (**BEIS0000980**) [Letter from Tim Parker to Secretary of State dated 30 September 2021] (**BEIS0000981**). I am not sure I draw any particular cultural conclusion from this, other than that POL existed in an uncomfortable space between the public sector (where lower salaries are usually and necessarily just accepted by leaders as part of the package, in the knowledge they are providing public service) and the private sector (where pay is higher than what POL usually offered). However, it certainly raised the temperature of our interactions with POL leadership, and took up time. I was concerned that POL executives would leave and we would be left with no ability to replace them, which I understood Mr Parker and Mr Staunton to be concerned about too [Readout - Minister Scully call with Tim Parker 15.11.2021] (**BEIS0000982**).
33. As to cultural change within POL more broadly beyond the Executive team, by the time I became Permanent Secretary in July 2020 Nick Read had already announced a programme of reforms of the organisation focused on forging a

new relationship with SPMs and making fundamental changes to POL's culture, practices and operating procedures.

34. The key cultural changes I was told had already been made by POL included:

- a. An agreement to appoint a current SPM as Non-Executive Director to POL's Board to influence POL's strategy and the implementation of programmes affecting postmasters.
- b. Increasing postmaster remuneration by £20 million a year on top of the £17 million increases secured for banking services through POL's new framework with the high street banks.
- c. Undertaking a programme of improvements to overhaul culture, practices and operating procedures throughout POL to forge an open and transparent relationship with SPMs. Area Managers had been appointed to provide support to SPMs.
- d. Comprehensive improvements to recruitment and training to daily transaction accounting, with dedicated Post Office teams available to SPMs for support.
- e. Setting out for SPMs the detailed responsibilities and commitments which support them to build thriving businesses.
- f. Establishing claims schemes to provide redress for former and current postmasters who experienced unexplained shortfalls.

35. My ability to judge the success of this programme mainly rested on what we heard from Postmasters – improvements in feedback began in around 2022

but by 10 August 2022 I was told by Mr Cooper and Mr Creswell that , while the Second POL Annual Research survey showed an overall increase in SPM sentiment, it remained low at 28% [Post Office Limited (POL): Quarterly update 10 August 2022] (**BEIS0000983**). Whilst the level of SPMs satisfaction was therefore still poor, it was the view of UKGI and the BEIS team that those improvements, small though they were, were as a result of the work POL had been doing on the feedback from previous surveys. By that time POL had introduced WhatsApp groups to improve Area Manager communications, and there had been engagement through the Regional Forums and the Voice of Postmasters to identify opportunities for continuous improvement.

36. Pressing for continued cultural change was to form an ongoing part of my relationship with POL, and on 23 May 2022 I wrote to Tim Parker requesting further assurance on POL's systems and processes [Letter to Tim Parker from Sarah Munby re STRATEGIC PRIORITIES FOR 2022/23] (**BEIS0000984**).

37. On 1 September 2022, Tim Parker wrote to me setting out the changes that had been or were in the process of being made by POL in response to the principal findings of the Common Issues Judgment and the Horizon Issues Judgment [Letter from Tim Parker to Permanent Secretary dated 1 September 2022] (**BEIS0000985**) . I was told that POL had commissioned a project, 'Shine a Light', within its Historical Matters Business Unit to review the Common Issues Judgment and identify areas for improvement. That work I understand was supplemented by a review undertaken by Deloitte published in March 2021 which identified completed improved actions. This, together with a third

report published in June 2021, a stock report issued by POL's Group Compliance function, framed the actions to be taken in response to the Common Issues Judgment. The key changes identified to me were:

- a. A restructuring of the business which focussed on SPMs, with better regular reporting the deliverables arising from the Common Issues Judgment to the Group Executive and POL's Board.
- b. All automatic deductions from SPMs remuneration were stopped, unless these had otherwise been agreed with SPMs.
- c. An independent appeal panel had been set up, including former SPMs, to review disputed investigations, suspensions and terminations.
- d. A discrepancy investigation process was put in place that included processes to improve quality and consistency
- e. A suite of policies had been introduced to ensure all SPM support practices are consistent with POL's duty of good faith.
- f. POL's "Branch Hub" had launched as a portal for SPM communications, trading data, e-forms, and other day-to-day operational support.
- g. New training, content and learning aids had been developed to support SPMs better in how they run their branch and grow their business.
- h. New SPM onboarding was simpler, with a single point of contact, and with an average time to onboarding reducing from over a year to 5 months.

38. I was told that changes were assured by POL's Internal Audit function and the commissioning of a number of reviews.

39. In respect of POL's culture, Mr Parker recognised the systemic cultural issues at POL in his letter to me and said that "*we must change the way we work comprehensively so that the issues as raised in the CIJ, can never happen again*". He told me that POL had "*embarked on an extensive culture transformation programme with the aim of 'putting Postmasters at the heart of the business'*".
40. To that end, POL had appointed a Director of Culture Change, Communications and Engagement to develop and execute a programme of cultural change lead by the Senior Leadership Group. POL had developed a new "*Ways of Working*" to "*align all Post Office to our behaviours of 'working in partnership, as one team to deliver'*". I was told that all POL Leadership and Group Executive members had undertaken the first phase of POL's "*Leading to Serve*" programme which had been extended to Regional and Area Managers. I was told that all POL staff had participated in a SPM-oriented immersive learning programme of activities. Mr Parker told me that POL had "*aligned all Postmaster facing teams under a single Group Executive member to break down solos and ensure consistency of interactions*".
41. Others will be better placed to comment on how effective these changes have been. From my perspective at the time, it looked like considerable corporate effort was being put on this agenda, in a sensibly structured and serious way, but that actual results were slow (at least in terms of how SPMs were feeling). That was perhaps unsurprising – given the terrible betrayal of postmasters'

trust by POL management, rebuilding trust was always going to be a challenging journey. This was one of the ongoing priorities I set for the new Chair, Henry Staunton, when he was appointed [Email from Permanent Secretaries to Gourlay, James - UKGI, Rajeswaran, Siv - UKGI, Creswell, Carl (Business Sectors - Services Directorate), Bickerton, David (Business Sectors DG Office), Brooks-White (Jobshare) dated 9 December 2022 RE: OS COMMERCIAL: Perm Sec letter to new POL Chair] (**BEIS0000986**); [Letter to Henry Staunton from Sarah Munby] (**BEIS0000987**).

Redress and Compensation

42. As I am aware the Inquiry has received detailed information on the specifics of the compensation schemes (reflected in the Interim documents produced by the Chair, several of which were produced during my tenure as Permanent Secretary, and which the Department responded to at the time), I have tried to focus the rest of this witness statement primarily on my own reflections as to the effectiveness of redress during this period, and what lessons might be learned from the process. This evidence is, therefore, primarily based on my own views – I am acutely aware that other views exist and it will be for the Inquiry to look in the round as it reaches its conclusions. Nevertheless, I hope these reflections are helpful.
43. I view these conclusions as broadly consistent with those the NAO reported on in its July 2024 report on Lessons Learned from government compensation

schemes [National Audit Office - Lessons learned: Government compensation schemes Cross-government] (**RLIT0000258**), which emphasises stakeholder trust and engagement. My thoughts are a little more specific about how this relates to the POL schemes as an individual case, but I would not personally disagree with any of the NAO's broader conclusions (though some are inevitably general to the point of being imprecise, simply because of the variation in individual schemes).

44. I want to start by framing the overall context as it has looked from my position. Ministers, officials in BEIS and UKGI, and those I encountered from the Post Office were all clear that the goal was prompt, fair and full compensation. I never encountered anything that could be described as resistance or opposition to that intent, from anyone. However, translating an intent into actual, delivered work does inevitably involve delays, complexities and challenges. In the case of compensation and redress for SPMs, like in many other areas of government policy, such delays and complexities have a real human cost. I have tried to reflect on where we could have done better, faster. Of course, just because these lessons look clear (at least to me) in hindsight, that does not necessarily mean they could have easily been fixed at the time. My experience of government policy as a whole is that when you get nearer to the end, you wonder why you couldn't have just jumped to there from the beginning. In reality though, at the start of the process, you don't have all of the information, or wisdom, that you will have gained by the end, and waiting to have a full picture before you act is damaging in its own way. I return to this in specifics below.

45. I have broken down my evidence into a series of specific reflections. This is my own list and is, of course, therefore an incomplete one.

HSS and the slow beginning

46. In brief summary, the HSS was introduced by POL in 2020 for the purposes of the investigation and compensation of SPMs not party to the Group Litigation Order. By July 2020 (when I became Permanent Secretary), the latest estimates were to expect approximately 500 claims costing around £35m. In the end, the HSS attracted around 2,500 applications and eventual costs were estimated in the region of £150m. POL committed to funding a little under £90m with BEIS committing to fund the compensation exceeding that threshold.
47. I add my own personal apology to the institutional apology that POL has already made for slow progress during the early part of the scheme's operation. POL (and, in turn, HMG) had seriously under-estimated the scale, complexity, and cost of the problem, and consequently HMG did not press POL hard enough to, and POL did not themselves, set up a sufficiently robust operation at the start. Operation got a lot better during 2022, with the end-2022 performance target being hit by POL.
48. I do not have any direct evidence to explain why this mistake was made. But with the benefit of hindsight, I think it is reasonable to conclude that, in the run-up to the scheme's launch, there was not yet a sufficient understanding of the

depth of the scandal and hence the scale of the response. Everybody knew by this time in mid-2020 that awful injustices had happened to significant groups of SPMs. The HMG Independent Review had been established and was about to become a Public Inquiry. However, there had not yet been a “no stone unturned” approach to understanding events, either by POL or HMG. The problem was assumed to be of a scale something like that already reflected in the GLO. In my view, that under-estimation of the scale of the problem was the fundamental cause of the early delays, rather than any unwillingness to deliver.

49. It looks like a version of this problem of insufficiently complete digging into the issue continued for some time. Although the Department was aware that some postmasters had missed the HSS open window, the scale and importance of the late applications issue was not really emphasised by POL, and hence by HMG, until the time at which it was mentioned by POL in its submissions to the Inquiry of May 2022. We then did serious work on how to handle the problem (including securing new approvals from HMT for what was, in Whitehall terms, a “new” expenditure). BEIS announced the new arrangements on 3 October. However, looking at the record now, it is hard not to wonder why this issue had not been raised more forcefully by POL to the Department earlier. There was, to some degree, a feeling by this point of not wanting to pre-empt the Inquiry, or step on its toes, but on this operational matter that doesn’t look like a good enough reason.

The fundamental approach

50. While it is true that the HSS scheme could have operated faster, sooner, if POL had better understood its likely scale, it would have still taken time, and placed a burden on SPMs, simply by nature of being an application-based scheme with applicant-by-applicant assessments, and the accompanying work of detail, panels and so on. The same applies to the OHCS and indeed the later GLO scheme. This inevitably raises the question of whether an entirely different approach could have been taken from the start.
51. Any such approach would necessarily have to have been much more “blanket” in its nature, and probably would have meant we all had to accept paying people whose circumstances were different the same amount as each other. Likely the only way it could have proved acceptable to SPMs is if the numbers had in general been much higher overall (“levelling up” the different individual payments rather than “levelling down”). For HMG to have gone down this road officials and Ministers would have had to have given up on two quite fundamental principles. First, fairness, both as to between different applicants, and as to between SPMs and other victims of past injustices. Second, standard use of public money, as we would have had to accept making payments that could not by any normal standard of judgement be viewed as compatible with the formal guidance for spending taxpayer money (Managing Public Money).
52. It is not completely fanciful to think such an approach could have been taken. During Covid, under Ministerial Direction (a specific public declaration that Ministers are prepared to pay out public money in defiance of normal value for money or other Accounting Officer considerations), HMG made widespread

payments to (broadly speaking) all furloughed workers and all owners of high street premises. Shortly after the Russian invasion of Ukraine, I was involved in putting in place energy support schemes under Ministerial Direction that (again, speaking broadly) provided significant support with energy costs to every household.

53. There are some important reasons why this approach would have been difficult to take here, and certainly at the time I was in post. First, it would have been technically very challenging to identify the correct “class” of people to pay and where to draw the appropriate boundary (at least for HSS). Second, the circumstances of individual SPMs differed hugely, and so blanket approaches could have been unfair to SPMs themselves. Third, giving out payments that were not strongly related to suffering that had taken place would have been seen by HMT as a very unwelcome precedent, effectively “ratcheting up” the taxpayer’s liability for other compensation schemes that might arise in entirely different areas (that were nothing to do with POL). There are probably other reasons as well. In due course HMG did get closer to this kind of model for OHC, through the introduction in 2023 of fixed payments (as an option) for those with overturned convictions: this group, of course, was a clearly defined class with a strong pre-existing legal claim against POL. And I know that the option of fixed sum payments has now been adopted across the various Horizon compensation schemes.
54. However, despite the real challenges of taking a more radical approach much earlier, and the particular challenges of doing so in relation to HSS, it is also

the case that when the (metaphorical) “Emergency” button has been truly pulled by HMG in other contexts, as it was during the energy crisis or the Covid pandemic, HMG has demonstrated enormous creativity in overcoming these sorts of problems, both technically and politically. Another example of this is the passing of the Post Office (Horizon System) Offences Act in 2024 which, in the face of significant concern about precedent from Parliamentarians and legal and constitutional theorists, quashed convictions en masse.

55. So, beyond the important operational and speed improvements that could have been made, particularly in the early part of the schemes’ operations, I have reflected on how things might have looked if we had operated in a truly radical mode, with a preparedness to rip up precedent; to do things that were not compatible with the duties of Managing Public Money; and to be “unfair” to some victims in the interests of speed and justice for the group as a whole. I don’t know if this would have been better. It might well have been. Certainly, given that Parliament ended up quashing convictions through legislation in the end, it would have been better to have taken that step earlier (although until that point it had not looked legally or politically plausible).

Independence and ownership

56. Postmasters have criticised the fact that the HSS and OHCS were run by the Post Office, albeit with significant Departmental and independent oversight. The later GLO Scheme was set up to be run by the Department in response to SPM feedback.

57. I did not personally see any evidence that POL running the schemes was specifically causing unfairness, or that POL were not trying to put into action their commitments. For example, I understand they never tried to pay out less than recommended by an independent panel. The challenges that POL faced in effective design and delivery were real, but many would have been replicated under a different administrator.

58. While for HSS the decision for POL to lead its operation arose I think primarily “by default” because it was originally a POL funded scheme that arose out of commitments made by POL in the GLO settlement, the question of ownership of OHCS was considered actively.

59. On 26 May 2021, Carl Creswell emailed me with his thoughts [Email Carl Creswell to Sarah Munby dated 26 April 2021 re Update on Post Office compensation next steps - OFF SEN COMMERCIAL] (BEIS0000988). He said that:

“It looks increasingly likely to me that we should consider taking on responsibility for the design and delivery of the compensation scheme within BEIS, though that would have large resource implications. The current HSS scheme (see below) is taking a long time and doesn’t offer the best model for the type of scheme we will need here.”

The big question for us [...] is whether we should set up a parallel team alongside the current Post Office policy team (perhaps at Director level) to oversee the criminal compensation scheme that we're likely to need. Ministers are currently saying that the design and delivery are for POL, which has its advantages, but we are all likely to face criticism if compensation does not flow quickly. Much depends on whether it is decided that we should go for mediation or to court with some 'malicious prosecution' test cases. We still aren't completely sure what the postmasters want either, though we are pressing POL for this information."

60. I agreed with Mr Creswell that this was an issue, and we ultimately presented analysis to Ministers on the pros and cons of HMG running the scheme on 10 June 2021 [Email from Carl Creswell to Secretary Of State (Kwasi Kwarteng), Scully, Minister (Private Office), Callanan, Minister (Private Office), SpAds Office (Private Office) dated 10 June 2021 OFF SEN: Post Office: Ownership of Criminal Convictions Compensation] (**BEIS0000989**) [Post Office: Ownership of Criminal Convictions Compensation dated 10 June 2021] (**BEIS0000990**). The Secretary of State, following input from other Ministers, ultimately decided that the scheme would be left with POL but that BEIS should focus on "*delivery and ensure appropriate governance structures in place with POL*" [Email from Carl Creswell to Secretary Of State (Kwasi Kwarteng), Scully, Minister (Private Office), Callanan, Minister (Private Office), SpAds Office (Private Office) dated 10 June 2021 OFF SEN: Post Office: Ownership of Criminal Convictions Compensation] (**BEIS0000991**) [Email from Secretary Of State (Kwasi Kwarteng) to Scully, Minister (Private Office), Callanan,

Minister (Private Office), Holmes, Euan (Communications), Creswell, Carl (Services Directorate), SpAds Office (Private Office) dated 6 June 2021 RE: OFF SEN: Post Office: Ownership of Criminal Convictions Compensation] **(BEIS0000992)**.

61. There were substantial reasons at the time why POL running these schemes looked to Ministers like the right approach. POL had first-hand access to all the data and information required to make disclosures and review cases (and it was difficult to do the necessary data transfers). It was also POL's legal and moral responsibility, and they were (at the start) paying for it – HMG would not standardly step-in to correct an ALB's mistakes by running the response. The submission also notes that previous compensation schemes run directly by the Department had had their own very significant operational difficulties. In this case, had the scheme been run by the Department it would have been caught (just to give a few examples) in the challenges that arose from Departmental headcount restrictions and in the debates about reprioritisation of people to deal with Covid and energy crises.

62. However, notwithstanding these legitimate practical reasons for the model that was used, I think we all underestimated the impact on SPMs of having the schemes run by POL. Even if the schemes were, in objective terms, being run fairly and appropriately (which I appreciate is disputed), it is clear many SPMs felt it was in principle wrong for POL to be administering this work. It is not difficult to empathise with this position given the horrendous betrayals of trust that had taken place in the past.

63. On balance, I think we should probably have moved faster to adopt HMG ownership of the schemes. I am not sure it would have improved their operation – indeed it might very well have worsened it, particularly if we had shifted the schemes while they were “in flight”. But the potential payoff in trust, and in an even more acute sense of HMG accountability for performance, might well have been worth it. In particular, bringing the operation of the schemes “closer to the politics” might have led (though this is of course my own speculation) to more effective engagement with postmasters, because ultimately Ministers would likely have felt the emerging postmaster feedback on this point very acutely, given their Parliamentary positions.

The GLO

64. Even at the very beginning of my tenure, it was obvious that the GLO settlement had (while being legally sound) caused a deep natural injustice, as those involved received so little money in their pockets after legal bills were settled and the litigation funders received their slice (particularly in comparison to other groups of SPMs). In March 2022 Ministers announced further funding would be made available for an additional compensation scheme for this group. Getting this scheme agreed took some time – between the recognition of the problem (which certainly pre-dated July 2020) and the announcements in early 2022.

65. This was, in the early part, probably due to a conceptual assumption by officials and Ministers that the GLO settlement had closed the book on this issue. Obviously this was legally true (the relevant postmasters had no further legal claim against POL) but it was not morally true. But by Carl Creswell's email of May 2021 (**BEIS0000988**) we were clear we needed to act. This proved difficult to make happen. It took significant time to find a legal means to pay the money.
66. This problem was real (and I think BEIS and HMT officials did a good job locating the Appropriation Act option). It does of course raise the question why HMG didn't just legislate to create spending authority, rather as eventually happened in 2024 under the Post Office (Horizon System) Compensation Act. I think the answer comes back to my point above about the extent of radicalism both officials and Ministers were contemplating – emergency legislation of this type is exceptionally difficult to make happen, and, speaking very frankly, requires an enormous head of political steam to have built up. This could, perhaps, be viewed as another example of not fully engaging on the human side of the issues (in this case, the shocking unfairness the GLO settlement created) and pushing for true radicalism in the approach.

Incremental improvement

67. Very significant improvements have been made to the operation of the schemes. Examples include improving (or introducing) guidance and legal support, introducing optional fixed sum offers, interim payment options, disregarding payments for benefit assessment purposes and neutralising

taxation. Many of these have been in direct response to postmaster feedback, or to recommendations from the Inquiry itself.

68. This is obviously a good thing (as in, better to have made these changes than not). However, it gives rise to good questions about why each of those things were not done sooner, or indeed right from the start. Others are better placed to comment on each of the individual specifics, but I thought some more general reflections might be helpful.
69. It is tempting to think that all of these issues should have been identified and addressed in the design from the beginning, and that obviously would have been ideal had it been possible. However, it has been my experience in every similar large-scale scheme that I have been part of that you just cannot fully see all the practical issues when you start. Waiting to get the fullest picture and design the most ideal scheme tends to leave you waiting at the starting blocks as the issues pile up. The “least bad” option is usually to get going, and then make changes in flight, even if that is sometimes hard for users, and sometimes politically difficult for Ministers who have to justify why officials didn’t sort it out in the first place. For this reason, I do not think it was a “mistake” that (for example) different schemes launched at different times, or that schemes launched without a full set of interim options. Of course, with hindsight, it would have been better to put all these things in from the start, but it is only with hindsight that all the issues emerge, and many of them come from feedback from those who are using the schemes.

70. This of course does not preclude debate about whether, in any specific case, the change could have been made earlier (and the slow introduction of guidance for HSS looks wrong, under any light). But I don't think in general delays were caused by substantial resistance to making changes: but rather the challenges of working them through in practice.

Overall conclusions on delivery of redress

71. In 2020 it was already clear that a terrible injustice had occurred and HMG and POL were publicly committed to dealing with it properly. The Inquiry itself was underway. During my tenure as Permanent Secretary, delivering compensation and redress was a key priority for the Department. The schemes were improved and expanded throughout. Notwithstanding real concerns, much important work was done, and postmasters were very much at the forefront of HMG's considerations.

72. In the round, looking back on events, an initial underestimation of the scale and depth of the challenge in truly delivering "redress" was then followed up by a plausible but incremental set of decisions on how to deliver full and fair compensation, with those decisions focused on deliverability, fairness, appropriate use of public money, and good governance, justifying and building up the response piece by piece. Such considerations are the mainstay of government and we should not leave them behind hastily. However, had we begun down the path with a deeper and more complete understanding at the start of the true human impact of all that had happened previously, I wonder

whether both officials and Ministers might have taken bolder, more radical decisions earlier, that would have allowed us to reach towards full and fair redress faster, and with less distress for postmasters.

Statement of truth

I believe the content of this statement to be true.

Signed:

GRO

Dated: 02/10/2024

Index to the Second Witness Statement of Sarah Munby

No.	Inquiry URN	Document Description	Control Number
1	BEIS0000952	Department for Business, Energy and Industrial Strategy Report: Horizon Review Progress Update	BEIS0000952
2	UKGI00024240	Email from Tom Aldred to Pranita Bhargava re: OFF-SEN Pot Office litigation: appeal update.	UKGI033135-001
3	UKGI00016309	Introductory meeting with Nick Read, CEO of post Office Limited - 30th September.	UKGI027102-001
4	BEIS0000955	Email from Pranita Bhargava to Permanent Secretary, Cc' Sarah Munby, Beth White and others Re: Briefing for Permanent Secretary/Nick Read	BEIS0000955
5	BEIS0000956	Briefing to Secretary of State and Minister re POL Group Litigation background and latest status	BEIS0000956
6	BEIS0000957	UKGI Post Office Limited (POL): Quarterly Update	BEIS0000957
7	BEIS0000958	Email from Joshua Scott to Paul Scully, Secretary of State, Minister Callanan, Cart Creswell and SPADs re [OFF:SEN] RE POL - SoS/Minister Scully/Lord Callahan/SPADs - 1 Sept Meeting	BEIS0000958
8	BEIS0000959	Post Office - update on POL Post-GLO Litigation Briefing for BEIS Ministers, Permanent Secretary and Special Advisors	BEIS0000959
9	UKGI00013178	Agenda re: Post Office Ltd.'s Update to BEIS on POL Litigation	UKGI023972-001
10	BEIS0000961	Email from Minister Scully to Joshua Scott, Minister Callanan, Permanent Secretary and others re: POL - SoS/Minister Scully/Lord Callanan/SPADs - 7 Sept Meeting	BEIS0000961
11	UKGI00010387	Post Office Limited - Shareholder Relationship Framework Document.	UKGI021195-001
12	POL00413475	Managing Public Money	POL-BSFF-0233694
13	POL00104180	Letter from Mrs Sarah Munby to Mr Tim Parker re: Post Office	POL-0103763
14	BEIS0000963	Email from Sarah Munby to Carl Creswell, Tom Cooper, Richard Watson and others re Highly	BEIS0000963

		confidential. POL Litigation/Governance	
15	UKGI00045960	Email from Carl Creswell to Lily Putt, Tom Cooper, Richard Watson and others re: Highly Confidential. POL Litigation/ Governance	UKGI023462-001
16	UKGI00012703	Email from Tom Cooper to Charles Donald, Richard Watson, Carl Creswell and others re: POL Litigation/ Governance - Confidential.	UKGI023497-001
17	BEIS0000966	Ministerial submission from Siv Rajeswaran to the Permanent Secretary re Lisa Harrington call and NED Post Office Limited	BEIS0000966
18	BEIS0000967	PO - Letter RE: Letter of apology from Lisa Harrington	BEIS0000967
19	BEIS0000968	Email from Siv Rajeswaran to Permanent Secretary, James Gourlay cc: Rebecca Stockbridge and others re OS Commercial Briefing Note (Sarah Munby call with Lisa Harrington)	BEIS0000968
20	WITN11520201	Email from Permanent Secretary to Siv Rajeswaran, David Bickerton, Carl Creswell and others re Sarah Munby call with Lisa Harrington	WITN11520201
21	UKGI00016507	Articles of Association of Post Office Limited (adopted by a written resolution passed on 19 March 2020). No 02154540	UKGI027300-001
22	BEIS0000970	Email from Meet Desai to the Permanent Secretary cc'ing Tom Cooper, Edward Emerson and others re: Post office- withholding funding	BEIS0000970
23	BEIS0000971	Post Office Limited (POL) - Network Investment and Subsidy Payments due to POL by BEIS	BEIS0000971
24	BEIS0000972	Email from Meet Desai to Permanent Secretary, Submissions Distribution List cc'ing Carl Creswell and others re: OFF-SEN COMMERCIAL: Post Office Limited (POL) - funding delay from BEIS to POL	BEIS0000972
25	BEIS0000973	Email from Scully Minister to Permanent Secretary and Scully Minister re POL funding	BEIS0000973
26	BEIS0000974	Email from Permanent Secretary to Meet Desai, Submissions Distribution List, cc Carl Creswell and others re	BEIS0000974

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35	BEIS0000982	Readout of MS Teams meeting between Minister Scully and Tim Parker re Incentive Scheme	BEIS0000982
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37	BEIS0000984	Letter from Sarah Murphy to Tim Parker RE: Strategic Priorities for 2022/23	BEIS0000984
38	BEIS0000985	Letter from Tim Parker to Permanent Secretary re: Engaging with the Post Office Horizon IT Inquiry and Implementing change	BEIS0000985
39	BEIS0000986	Email from Permanent Secretaries to James Gourlay, Siv Rajeswaran, Carl Creswell and others re OS COMMERCIAL: Perm Sec letter to new POL Chair	BEIS0000986

40	RLIT0000258	National Audit Office - Lessons learned: Government compensation schemes Cross-government	RLIT0000258
41	BEIS0000988	Email from Carl Creswell to Sarah Munby. CC: Permanent Secretary, Michael Keoghan and others. RE: Update on Post Office compensation next steps - OFF SEN COMMERCIAL	BEIS0000988
42	BEIS0000989	Email from Carl Creswell, Secretary of State, Minister Scully cc: Permanent Secretary, Michael Keoghan and others re Off Sen: Post Office: Ownership of Criminal Convictions Compensation	BEIS0000989
43	BEIS0000990	DBEIS Report on Post Office: Ownership of Criminal Convictions Compensations	BEIS0000990
44	BEIS0000991	Email from Minister Callanan (Hannah Cowie) to Euan Holmes, Minister Scully, Carl Creswell and others RE: OFF SEN: Post Office: Ownership of Criminal Convictions Compensation	BEIS0000991
45	BEIS0000992	Email from Secretary of State to Minister Scully, Minister Callanan, Euan Holmes and others re: OFF SEN: Post Office: Ownership of Criminal Convictions Compensation	BEIS0000992