

Witness Name: Mark Underwood

Statement No. WITN00990100

Dated: 12 November 2024

POST OFFICE HORIZON IT INQUIRY

FIRST WITNESS STATEMENT OF MARK UNDERWOOD

I, Mark Underwood, will say as follows:

INTRODUCTION

1. I am currently employed by Post Office Limited (“**POL**”) as its Legal, Compliance & Governance Operations Director. I have held this post since April 2020. I joined POL in September 2014, initially as an independent contractor before becoming an employee in 2016. I describe the previous roles I have held at POL in the Background section of this witness statement below.
2. This witness statement is made to assist the Post Office Horizon IT Inquiry (the “**Inquiry**”) with the matters set out in the Rule 9 Request dated 27 September 2024 (the “**Request**”).
3. I have prepared this witness statement independently of my employer, POL and with the assistance of independent legal representation from Farrer & Co LLP. To assist my recollection and the preparation of this statement I have

reviewed additional contemporaneous documents, requested and supplied to me by the Inquiry. I have also had the opportunity to refresh my memory using material held by POL that is relevant to these events. I have mainly relied on the documents provided to me by the Inquiry, and in instances where I have not and I have relied on other documents, I have supplied the Inquiry with those documents. A full list of the documents exhibited with this statement is included in the accompanying index. Where I have quoted from any of the documents exhibited with this statement, these are in italics.

4. I have prepared this statement during October and early November, as required by the Request. The Request contains 59 questions and I have been directed by the Inquiry to review 202 documents. There are a very large number of documents that relate to my time at POL. I understand many have been disclosed to the Inquiry, however I am uncertain as to how many. Most of these may not be relevant to the Request, but in any event it has not been possible in the time available either for me or my solicitors to conduct an extensive document review. I have instead sought to focus on identifying key documents that will assist the Inquiry. The Request also included one document that has not been made available to me by the Inquiry and that the Inquiry confirmed on 29 October could be disregarded for the purpose of the Request. I have therefore not had the opportunity to review this document. Notwithstanding these limitations, I am comfortable that this statement is true to the best of my knowledge and belief.
5. Owing to the timing of the Request (which relates to Phases 5 and 6 of the Inquiry), I would like to make clear to the Inquiry that, prior to its receipt, I had

already viewed some of the witness evidence for Phases 5 and 6 and read parts of the associated witness statements. These are in the public domain on the Inquiry's website. The evidence already heard along with the associated statements have also assisted in my recollection of events over the past 10 years or so. Where I have derived information from other sources, I say so, and that information is also true to the best of my knowledge and belief.

6. I have addressed the questions asked within the Request in a narrative form and I have broadly structured the statement to follow the section structure of the Request.

BACKGROUND

7. I have been asked to set out a summary of my career and qualifications. I graduated from the University of Manchester in 2005 with a degree in Economics and Social Studies (BA Econ). This was an interdisciplinary programme focused around economics, accounting, finance, politics, and sociology.
8. Prior to joining POL, I worked within the research team of a small government funded organisation named e-skills UK. The primary function of this team was to produce annual research reports for the UK and its constituent nations and regions. These reports analysed the UK's IT & Telecoms workforce, providing forecasts of growth rates over a ten-year period and the possible impact of these on the labour market. Aside from contributing to these reports, my other responsibility was in relation to modelling the economic impact of the programmes the company delivered to remedy market failure and for which they received government funding. Subsequent to leaving this organisation in

2013, I worked as an independent contractor on numerous projects for various organisations focusing on economic impact evaluation, research and analysis.

September 2014 – November 2016

9. In September 2014, I joined POL as an independent contractor to work on Project Sparrow, which was the internal project name attached to the Initial Complaint Review and Mediation Scheme (“**ICRAMS**”). Initially I was asked to produce cost projections, improve trackers, produce management information, co-ordinate people internally and attempt to obtain clarity on issues such as remote access.

10. I joined the team at a similar time to a number of other individuals to, I think, replace PA Consulting who had, up until that point been supporting the Project Sparrow Programme Director. The then Programme Director, Belinda Crowe retired in March 2015 and soon after, her initial ‘successor’, Tom Wechsler, became Chief of Staff to POL’s Chief Executive, Paula Vennells. By this stage (March 2015), Second Sight had or were soon to be re-engaged onto a ‘piece-rate’ (as opposed to the prior ‘time and materials’ basis), the Working Group had been disbanded and POL had agreed to mediate all cases, save for those that had been subject to a prior court ruling; civil and/or criminal. The focus of the team, including mine, became ensuring Second Sight produced the outstanding Case Review Reports (“**CRRs**”) according to the work plan they created and scheduling mediation meetings. Evidently, there was also a significant amount of political and media interest during this time which I, along with others, assisted with POL’s response too - based upon the information available to us at that time.

November 2016 – December 2018

11. I joined POL as an employee in August 2016 as 'Head of Corporate Services Central Support'. This coincided with a larger internal re-structure at POL. By this stage the last mediation in the ICRAMS had taken place (I think this was on 2 January 2016), and my focus had shifted to facilitating the work Jonathan Swift KC had been asked to undertake by POL's then Chairman, Tim Parker ("The Chairman's Review") [POL00022635] though this changed once Freeths LLP issued its letter of claim in April 2016. The Chairman's Review was the internal name for the review that Mr Parker instructed Mr Swift KC to undertake into the adequacy of the ICRAMS and POL's handling of the complaints made by Postmasters. I do not recall exactly when, but a further re-organisation at POL resulted in my reporting line changing to the then General Counsel (Jane MacLeod) and my job title becoming 'Head of Portfolio: Legal Risk and Governance'. In this role I supported Mrs MacLeod from a functional management perspective (e.g. budgets, away days, meeting agendas and their cadence) and had specific responsibility for the organisation of the Postmaster Litigation Steering Group ("PLSG") meetings and a number of Business as Usual ("BAU") teams including POL's Information Rights Team, the Security Communications Team and the Group Litigation Investigations Team – the latter aiding Womble Bond Dickinson ("WBD") with the identification and collection of records and documents held across the organisation and which were thought to be relevant to the claims made against POL in relation to the Group Litigation.

December 2018 – April 2020

12. In December 2018, my job title was changed to 'Portfolio Director'. In this role I continued to support the Group Litigation Programme but also inherited responsibility for the delivery of projects that Mrs MacLeod sponsored. By way of example, these included the latter phases of POL's GDPR Programme, a programme to define and implement retention schedules across the organisation, and a programme initially set up to optimise the Group's legal entity structure ("**Project LEO**"). Project LEO was stood up to enable the realisation of a then Board stated financial services strategy but which was later re-purposed to deliver new Articles of Association for POL and its subsidiaries and to agree the first iteration of the shareholder relationship framework document, as between POL, UKGI and BIS (as it was known then).
13. Subsequent to the Common Issues Judgment being handed down and Mrs MacLeod's departure, a period of change followed. I had a number of line managers and roles in the approximate 12 months before being appointed to the 'Legal, Compliance & Governance Operations Director' in April 2020. During this period I continued to support a number of the activities described at paragraph 12 and the then Business Improvement Director (Angela Van Den Bogerd) with the Horizon Issues Trial Contingency Planning. With support from Deloitte, Mrs Van Den Bogerd and I were tasked with preparing the business to be able to provide an effective response to an adverse Horizon Issues Judgment and putting in place what was termed as being a 'Rapid Response Team' [**POL00279995**]. I was part of this team and explain its purpose and my involvement in this more at paragraph 157 below.

14. Furthermore, and for completeness, I also assisted with the acquisition of Payzone in 2019 and the pilot implementation of POL's Contract Management Framework, which led to the decentralised contract management model POL currently adopts.

April 2020 – Present

15. Since April 2020, I have been in the role of 'Legal, Compliance & Governance Operations Director', reporting to POL's Group General Counsel, Ben Foat. The title reflects the areas that were included in the directorate at the time (Legal, Compliance and Company Secretariat) and my role being focussed on Operations. My primary responsibility is to ensure the smooth running of the Office of the General Counsel via an effective meeting cadence and operating rhythm, aiding the directorate to operate effectively; underpinned by the necessary budget and signature processes. I also support other members of Mr Foat's Lead Team and other areas of the business with the delivery of key pieces of work, some of which are cross-functional in nature. The most recent example would be the Grant Thornton review into the effectiveness of POL's corporate governance.
16. Mr Foat was the Executive Sponsor for the Remediation Unit and Inquiry programmes from September 2021 until July 2023. During this time and particularly in the early months, I also assisted Mr Foat by way of drafting and reviewing papers, growing the Inquiry programme team and recruiting for an in-house Inquiry Legal Team that stood outside of and was independent of the BAU and Remediation Unit Legal Teams. During this time, I was also, for example, tasked with conducting a review into POL's data landscape and in

operationalising POL's statement of 15 November 2021 in relation to legal professional privilege which confirmed, as a general principle, POL was prepared to waive its privilege for the purpose of the Inquiry over materials that were created in the period up to 26 February 2020 (to the extent these materials are relevant to the Inquiry's Terms of Reference or requests). What this meant in practical terms was collecting POL's client files from its current and historic legal advisers so as to provide POL with confidence that it had within its possession those materials it had waived its privilege over.

17. Although I have worked closely with POL's internal and external legal teams throughout my time at POL, I was not, nor am I now, legally qualified.

KNOWLEDGE OF THE HORIZON IT SYSTEM

18. I had no knowledge of the Horizon IT System ("**Horizon**") prior to joining POL in September 2014. Whilst working on Project Sparrow / the ICRAMS (the detail of which follows below), I began to gain knowledge of the complaints that had and continued to be made by postmasters regarding both the level of support provided by POL and the Horizon IT System. I continued to gain knowledge about these issues over a number of subsequent years through my interactions with Fujitsu, my involvement in the Chairman's Review, my interactions with Deloitte (through Project Bramble), the Group Litigation Order ("**GLO**") and by virtue of the summary documents WBD produced post handing down of the Horizon Issues Judgment – all of which is set out within this statement.

Bugs, Errors or Defects in Horizon

19. None of the roles I have performed at POL have involved investigating or remediating the technical side of the bugs, errors or defects in Horizon (“BEDs”), including those which had the potential to impact branch accounts. However, my involvement in the programmes referenced within paragraph 18, meant that I did become aware of certain BEDs, as they were reported on by Second Sight, within the Chairman’s Review, and as part of or subsequent to the GLO Proceedings.
20. For example, I believe I first became aware of the Receipts/Payments Mismatch Bug, Callendar Square Bug and Suspense Accounts Bug as a result of the work performed by Second Sight – all of which were reported on by Second Sight within their Interim report of 8 July 2013. I can see from the documents provided to me by the Inquiry that I sought information from Fujitsu from as early as:
- 20.1 7 April 2015 regarding the Receipts/Payments Mismatch Bug **[FUJ00081950]**, including asking Fujitsu to explain what the statements made by Second Sight about this bug meant, and specifically:
- (a) How the alterations that Second Sight had cited would be made
 - (b) Whether they would leave a detectable footprint
 - (c) The effect they would have on data integrity
 - (d) Whether the alterations would be visible to branches
 - (e) What course of action was taken

- 20.2 11 June 2015 regarding the Receipts/Payments Mismatch Bug, Callendar Square Bug and Suspense Accounts Bug **[FUJ00237386]** during which I note my intention to “...*pull together the definitive detail on each of these bugs...*” and ask to be provided with “...*as much information as possible about each of the three bugs...*”
21. Information about each of these BEDs was provided to Mr Swift KC and featured within the Chairman’s Review. I do not recall being aware of the other BEDs commented on within the Chairman’s Review prior to obtaining information from Fujitsu to aid the production of this report. I do recall, on occasion being frustrated by Fujitsu for not being able to easily provide the information being requested, such as the “*number of system errors identified, by year, that could affect branch accounts together with the number of branches that were affected and were capable of being affected by these errors, together with reasons*” **[POL00323499]**, and that it was not always straightforward to obtain information from them. For example, **[POL00317146]** shows that as at 16 June 2015 Fujitsu’s view was that there had only been evidence of two BEDs within Horizon, despite three being reported on within the Second Sight Interim Report of July 2013 and, as included within my subsequent challenge back to Fujitsu “...*in terms of the third bug – this was said to have occurred at the Callendar Square Branch in Falkirk, so I presume it does exist – not least because it was reference[d] in two separate court procedures? Could you do some digging please?*”
22. Nevertheless, I note Mr Swift KC’s concluding point on the “Bugs in the Horizon System” section of the Chairman’s Review **[POL00022635]** where, at

paragraph 120, it reports “*We have seen nothing to suggest that these specific bugs identified have been the cause of wider loss to SPMRs in the Scheme cases or otherwise. We see no basis upon which to recommend any further action in relation to those identified bugs now*”. Evidently, my knowledge and understanding of these BEDs was based upon information which already existed and additional information I was then able to obtain from others, principally Fujitsu – often to aid or better understand the investigations being performed by third parties such as Second Sight and Mr Swift KC **[POL00323499]**.

23. Aside from the Receipts/Payments Mismatch Bug, Callendar Square Bug (also known as the Falkirk Bug) and Suspense Accounts Bug, I do not believe I had knowledge of any further BEDs impacting branches prior to the Horizon Issues Judgment being handed down in December 2019. These BEDs occurred in Horizon prior to me joining POL and my role was to attempt to collate the information necessary in order to be able to try and understand and then summarise the details for each of them (e.g. **[FUJ00237386]**, **[POL00316930]**), capturing how POL and Fujitsu responded, subsequent to these BEDs being discovered e.g. how they were identified, resolved and prevented from occurring again, along with whether their existence/ remediation was communicated to/done in conjunction with or in the knowledge of Postmasters more generally. This exercise continued even post handing down of the Horizon Issues Judgment when I asked WBD to produce plain English summaries for each of the 29 BEDs that featured in the Horizon Issues Trial. These summaries were later shared with POL’s IT Team in or

around April 2020 to check whether all had since been fixed such that they could not impact upon branch accounts going forward.

Training

24. Between 2015 and, I think, 2022, Post Office's Head Office was located in Finsbury Dials. Within this office space was a 'dummy' Post Office which was used to provide demonstrations on and test certain products ahead of being released on the live environment. I do not recall being provided with any specific training on the Horizon system, save for attending the 'model office' ahead of the Christmas period, where POL employees were asked to work in-branch for approximately 3 days, to support with the additional workload over the busy period. The 'model office' provided a high-level overview of how the system works. I have not however ever operated a Horizon Terminal – in branch, over the Christmas period or otherwise.

ARQ Data

25. In lay terms, I understand Audit Retrieval Query (“**ARQ**”) data to be a record of each transaction performed in a branch. I do not believe I have ever had detailed knowledge of what is/is not contained within this data, nor that my understanding of what ARQ data is has materially changed over time.

Remote Access

26. I have been asked to describe my knowledge of the ability of Fujitsu employees to alter transaction data or data in branch accounts without the knowledge or consent of Postmasters up to 2011. I was not at POL in the time

leading up to 2011 and as such held no such knowledge ahead of joining POL in 2014.

27. However, soon after joining POL and as noted in paragraph 18, I became aware that a number of applicants to the ICRAMS believed the shortfalls they had experienced in their branch accounts may have been caused through their branch accounts being accessed and then altered without their consent or knowledge. I believe this first arose as an issue reported on in the context of Second Sight's work and POL's initial investigations ahead of the ICRAMS being established through 'Spot Review 5' [POL00307820] which was included in Second Sight's Interim Report of 8 July 2013.
28. I have reviewed the email chain from 28 October 2014 to 31 October 2014 when POL and WBD were drafting responses to the CRR for M053 and M078 and specifically in relation to references to remote access [POL00211695]. The email chain aligns with my recollection that the information POL had access to, and its own understanding of remote access was changing, and further inquiries were being made of Fujitsu to understand the issue.
29. Subsequent to attending a meeting on or around 6 November 2014, Patrick Bourke and I were tasked with producing a "*straightforward statement*" which captured in "*plain English*" what "*Fujitsu confirmed for us yesterday*" regarding remote access [POL00149488]. It is clear from this exchange and my email of 7 November 2014, that my understanding, which was based upon my recollection of what Fujitsu had told us during this meeting, was:
- 29.1 " ...Regardless of what happens to branch accounts; there is a clear audit trail left that is easily searchable by unique user and transactional ID's..."

- 29.2 It was only possible for Fujitsu (not POL) to 'inject' or 'insert additional transactions (not edit, delete, or alter existing transactions)' and this could be done through the insertion of a 'balancing transaction'.
- 29.3 Retention periods allowing, Fujitsu would be able to search the transaction data for each of the ICRAMS cases and had already performed searches over these datasets to establish whether or not a 'balancing transaction' had been inserted into any of the branch accounts for the period(s) of time they were operated by applicants to the ICRAMS.
30. Within this email (and my subsequent email of 11 November 2014) I note the need to establish what audit trail a 'balancing transaction' would leave before setting out my understanding of the ability of branch accounts to be accessed remotely, as at 7 November 2014. This was as follows:

*"Once a transaction is recorded in Branch by a SPMR or member of their staff, it cannot under any circumstance be **edited, manipulated or removed**. That transaction, against the user ID of the branch staff member who recorded it, will remain in the Branch accounts for ever and leave behind it a clear and identifiable audit trail. Though existing transactions cannot be edited, manipulated or removed, new transactions can be **added** to branch accounts, but only in the following three ways:*

- 1) There is the capability for Post Office employees to log on to a branch terminal locally (i.e. by being physically in a branch) using a unique user ID different to that of any branch staff. Such additional transactions, once recorded will remain in Branch accounts for ever and leave behind them clear and identifiable audit trails.*

2) POL can add transaction acknowledgements (TA) or transaction corrections (TC) into branch accounts. TAs are used to record transactions that have been processed in branch through other systems (e.g. the sale of Lottery products on the Camelot terminal) and TCs correct errors made by branches. Both, once added, will remain in the Branch accounts for ever and leave behind them clear and identifiable audit trails.

3) Balancing transactions. Where an error cannot be corrected through a TA or TC, Fujitsu can inject a new transaction into branch accounts using the balancing transaction process. This process has only been used once since the introduction of Horizon online, is attributed to a unique transaction ID and once injected, will remain in the Branch accounts for ever and leave behind it a clear and identifiable audit trail.

31. At this point, it was my understanding that POL would be able to discount remote access from being a potential cause for the shortfalls experienced by applicants to the ICRAMS by performing searches over the audit data. This was on the basis that *“there are only 3 ways transactions can be added to a Branch’s account, such additions leave ‘identifiable scars’ that are easily searchable and thus, if any SPMR feels they have been subject to ‘remote access’ – we can search for said ‘identifiable scars’.* If they are not in the Branch’s accounts, we can categorically say this set of Branch accounts has not had any transactions added to it by FJ or POL.” [POL00149488]. [POL00149598], includes an email within which I relay to POL colleagues that

Fujitsu had confirmed to me on a call of 20 November 2014 that “*where SPMR’s have identified periods of time mysterious transactions have taken place – the auditors have searched the data and no ‘remote access scar’ is present and thus did not take place*”. Though I note now that this references ‘auditors’ as having performed the searches and only in instances where complaints had been particularised, which is different and narrower to what I believe Fujitsu had said previously at the meeting of 6 November 2014, I still would have taken comfort in my understanding that with the assistance of Fujitsu, POL would be able to prove the negative where claims were particularised. **[POL00318209]** makes clear the conclusion (based on information from Fujitsu) that although searching for ‘Balancing Transactions’ across the whole POL estate and all versions of Horizon would be a “*big job*” and could “*take months*”, it would be possible to do.

32. At this stage, late November 2014, my knowledge of remote access was dependent upon the answers provided by Fujitsu in response to the various questions posed of them, often by reference to papers that had been drafted to try and bring clarity to the issue **[FUJ00087133]**. From reviewing the documents provided to me by the Inquiry, I recall being “*disappointed*” **[WBON0000326]** with the answers Fujitsu provided on the draft papers **[WBON0000327]** I asked them to review and provide answers to questions on. At the time I had a satisfactory rapport with Fujitsu, and I pushed back a number of times to Fujitsu on these responses and re-explained the purpose of the papers to get clearer and more robust answers from them. Based upon the documents provided to me, I think this process of making the papers more precise continued until 19 December 2014 **[FUJ00236842]** and was then

again revisited in April 2015 [FUJ00237155]. I was, and remain, mindful that POL was relying on Fujitsu's knowledge of remote access, and in so relying on Fujitsu's knowledge, was making representations to other third parties on remote access.

33. I believe my understanding of remote access remained as set out within paragraph 29 until I aided in the production of the Chairman's Review through the collation and provision of relevant materials and, as a result, becoming sighted on Deloitte's "Horizon: Desktop Review of Assurance Sources and Key Control Features" report, which is dated 23 May 2014 [POL00028062]. I do not believe this report was shared with me until receiving an email from Rodric Williams on Tuesday 13 October 2015 [POL00233987] and which, in turn was sent to Mr Swift KC to consider as part of the Charman's Review and which, along with the accompanying Board Briefing, is commented on within the Chairman's Review and resulted in a number of the Chairman's Review recommendations (as set out in paragraph 117 below).
34. My belief that I was not aware of the existence of the 'Project Zebra' reports nor its contents until October 2015 is evident from the information I suggested be included within Paula Vennells's briefing materials ahead of appearing at the Select Committee in February 2015. Subsequent to providing my understanding of what was/was not possible, I asked Fujitsu to confirm it as being accurate and to provide details on tests performed on the Horizon system [FUJ00087142].
35. Having become sighted on Deloitte's desktop report on Horizon on 13 October 2015, it is at this point that I believe I would have become aware of the

potential for Fujitsu to not only be able to inject additional transactions into branch accounts (but leave behind it a clear and identifiable audit trail) but also that Fujitsu could potentially delete files in an undetectable manner. I became aware of this information through Deloitte's desktop report and Mr Swift KC's synthesis of this information within the Chairman's Review. The Chairman's Review informed my knowledge on this subject. Within the Chairman's Review **[POL00022635]** Mr Swift KC records that in the context of the ICRAMS and allegations of remote access, allegations were "*generic rather than specific*" and "*...in the vast majority of cases specific transactions of concern have been readily explicable by common sense explanations; such as sharing of user identifications, or SPMRs being on leave, or mistakes as to the timings...*"

36. However, Mr Swift KC rightly also notes that they, unlike Second Sight, had been provided with the two documents produced for POL by Deloitte in May and June 2014 entitled 'Horizon: Desktop Review of Assurance Sources and Key Control Features' and an accompanying 'Board Briefing'. At paragraphs 140 and 141 of his report, Mr Swift KC writes:

"Deloitte note, following a review of the technical documentation, the ISAE3402 and verbal discussions with POL and Fujitsu, that database access privileges which "would enable a person to delete a digitally signed basket" do exist, but are "restricted to authorised administrators at Fujitsu". Those privileges "would enable a person to create or amend a basket and re-sign it with a 'fake' key, detectable if appropriately checked". Deloitte had not identified specific controls to prevent a person with the appropriate authorisation carrying out this exercise in an unauthorised manner. The

Briefing goes on to state that administrators had the ability to “delete data from the Audit Store during the seven year period, which was a matter...contrary to POL’s understanding...This could allow suitably authorised staff in Fujitsu to delete a sealed set of baskets and replace them with properly sealed baskets, although they would have to fake the digital signatures”. When we spoke to Deloitte, they described this functionality as resulting, in essence, from the level of security contained in Horizon being a level down from the maximum”.

“We have seen a response from Fujitsu concerning this aspect of Deloitte’s investigation, which is based upon a summary of it provided by POL rather than the original Board Briefing itself. Fujitsu appear to accept that Deloitte’s interpretation is technically correct, but emphasise the wide range of security measures in the software, hardware and environment which reduce the risk of interference. Fujitsu also, properly, stress that there is no evidence that any such action has occurred and that likelihood of all the security measures being overcome is so small that it does not represent a credible line of further enquiry”.

37. Mr Swift KC goes on to reflect that just because “...such activity is possible does not, of course, indicate that it has actually occurred” and queries why it would have done so, finding Second Sight’s suggestion that “Fujitsu employees could, in theory, run a fraud in collusion with an SPMR whereby transactions were added to the branch records generating cash payments out...” “inherently improbable”.

38. Though described by Mr Swift KC in his report as likely being “*wild goose chases*”, it was his finding that it was “*incumbent*” upon POL to commission further work which is then reflected in his recommendations 3,4, 5 and 6 **[POL00022635]**.
39. Mr Swift KC notes within paragraph 138 of his report, the 2014 Deloitte reports were based upon “*a desktop review of the operating documentation including discussions with Fujitsu. It did not involve access to the system itself or testing processes*”.
40. Further work to attempt to confirm the ‘art of the possible’ and the likelihood of occurrence was taken forward by Deloitte under the name “Project Bramble”.

Project Bramble

41. I have been asked to set out the extent of my knowledge and involvement with Deloitte on Project Bramble. I acted as Deloitte’s point person within POL for Project Bramble. My role was to ensure that Deloitte had access to whatever they needed in order to be able to produce their report. This involved agreeing commercial terms, facilitating access between Deloitte and Fujitsu, arranging meetings with POL colleagues such as Rob Houghton (POL’s then Chief Technology Officer) to determine scope, and testing Deloitte’s confidence in the system versus what they initially included within earlier draft versions of their report. Deloitte produced a number of versions of their report. I recall frustration within POL, WBD and the Counsel team on the contents of the initial reports not reflecting the strength of opinion regarding the reliability of the Horizon system when compared to the view expressed to us verbally by

the Deloitte team. With WBD, I reviewed each iteration of the report and sought to test and challenge the drafting where we felt it did not accurately reflect the confidence expressed to us verbally.

42. As noted above, Deloitte produced a number of reports and versions of reports and as their work progressed, the understanding grew, and scope widened. The first report was dated 8 July 2016, and the last report dated 19 January 2018. It was, I believe, Deloitte's first report of 8 July 2016 which confirmed a small number of 'super users' at Fujitsu had the ability to delete branch transactions (albeit it, at this stage Deloitte had not confirmed whether this could be done without leaving a 'footprint') and is what led to Mr Parsons's email of 13 July 2016 [WBON0001030] to Mrs MacLeod, Mr Williams and Mr Bourke. I suspect I was only copied owing to already being aware of the contents of this report. Mr Parsons notes within his email that this finding meant POL's historic statements about not being able to edit or delete transactions were, "*at least on face value*", incorrect. WBD subsequently proposed new wording on the remote access issue for the Letter of Response to Freeths LLP. As part of this exercise, I reviewed the scheme chronology and statements that had been made by POL regarding remote access, circulating this to PLSG members on 21 July 2017 [POL00025209].

43. Following my interactions with Fujitsu during 2014, Mr Swift KC's findings as included within the 2016 Chairman's Review, and prior to the handing down of the Horizon Issues Judgment in December 2019; my understanding regarding Horizon's integrity and the extent to which it was possible and likely that Fujitsu had remotely accessed and then altered branch audit data, which

could have been responsible for the shortfalls complained of, would have been based upon the findings as included within each version of the Project Bramble reports between July 2016 and what I believe to have been the final version as dated 19 January 2018.

44. For completeness, I paste the executive summary from Deloitte's report of 19 January 2018 **[POL00028928]** below:

"In assessing the Horizon Online system, our work has focused on a broad suite of controls which, in collaboration, work to assure that the integrity of transactional data is maintained from branch to Audit Store. The controls respond to the fundamental risks of data integrity which are:

- *Completeness – All data is transmitted from source to destination in its entirety.*
- *Accuracy – Data is accurately transmitted from source to destination without change.*
- *Validity – The data is valid and has not been doctored or changed such that it is no longer representative of the information the original data was recorded to capture, or has been created spuriously and not linked to a real life data generating event.*

The system controls across the areas of the Horizon Online system we have examined are robust at the point our work was conducted with minimal exceptions noted from our testing. They are appropriate to a system the size and scale of Horizon, and the distributed electronic point of sale (EPOS) function it performs. The system controls have been

designed to meet a high standard of control and have been assessed similarly in the reports of other independent assurance organisations such as Ernst and Young (Service Auditor Report) - although not specifically in the context of responding to these allegations.

Our work has focused on the core data flow within Horizon Online, from the Counter in branch to the Audit Store. We focussed on this particular core data flow because it is this data flow which leads to the initial capture of transaction data and its subsequent long term storage and, in the event of an issue or challenge, data is downloaded from the Audit Store to enable Post Office to carry out an investigation. This data flow is subject to industry standard cryptographic controls which are automated, inherent system controls and they are applied by the system to each and every transaction processed by the Counter. They represent the most reliable control type possible over data integrity – they are hardcoded into the system and no manual intervention is required for them to operate. As a consequence of being inherent to the technology they have been in operation throughout the life of Horizon Online

Working together, the Digital Signature (paragraph 1.3.3.1 (d)) and JSN (paragraph 1.3.3.1 (c)) controls respond to the fundamental data integrity risks of Completeness, Accuracy and Validity and make it extremely unlikely that the record of transactions contained within the Audit Store is not representative of the transactions input by staff in branch. As with all large scale computer systems whilst it is theoretically possible that glitches and coding errors in the system could have resulted in errors in the

recording of transactions to occur, the likelihood of such errors occurring in a manner which has adversely affected only certain branches materially whilst not affecting other branches at all / minimally is in our view remote given the controls in place. The testing we have performed over these controls was designed and executed to assess their operation in responding to these fundamental risks. Noting the assumptions and limitations detailed in section 1.5, this testing has not resulted in any matters being identified that would call into question the integrity of the core data flow within Horizon Online from the Counter in branch to the Audit Store.

While we have identified an exception in the cryptographic controls (paragraph 1.4.2.10 and 1.4.2.11) which would theoretically allow a malicious actor to undermine them and potentially change data, it is limited to a third party (Fujitsu) and would be technically very challenging to achieve. It would require significant motivation for one of the limited set of Fujitsu staff members to exploit this vulnerability given the technical challenges and risks of tripping monitoring controls and, although we have not performed procedures in this area, it would almost certainly require collusion with Post Office staff or Postmasters. Although our investigations have not been exhaustive, they have been extensive and we have seen no such evidence of malicious misuse of the system”.

May 2009 Computer Weekly Article

45. I created a chronology of events for Mrs MacLeod on 10 October 2015 [POL00104218], with an updated version provided on 13 October 2015

[POL00130960], which I then sought to keep up to date until Freeths LLP served the Letter of Claim on POL. The initial purpose of this chronology was for it to be shared with Mr Swift KC to aid his reading in and review. I provided Mrs MacLeod with a suggested draft email for her to send to Mr Swift KC on 13 October 2015 [POL00162686]. This included the following:

“In my email of 10 October 2015, I sent you a draft chronology of events over the last four years and said that I would provide you with the documents it is drawn from early this week. Having now collected c75% of these documents it is apparent that, due to their volume, doing so would involve providing a huge (136MB) amount of documentation – not all of which would necessarily be helpful to you at this stage of the work.

Can I suggest instead that, looking at the updated Chronology I attach, you identify any documents you feel you would particularly like to see at this juncture and I will ask the team here to get them over to you as soon as possible? For information purposes, those ‘events’ that are highlighted in yellow have been previously supplied and those with a ‘tick’ in the ‘schedule’ column have had their supporting documentation identified”.

46. In preparing this witness statement and having reviewed the chronology [POL00041564], I have noted that the 2009 Computer Weekly article is included within it. Although I cannot recall the motive behind including it, I believe it would have been due its relevance to creating a timeline to explain the genesis of ICRAMS. I do not recall the 2009 Computer Weekly article being discussed within POL.

POL's Prosecutorial Function

47. I have been asked to set out my knowledge of POL's prosecutorial function. I have never had any involvement in a POL prosecution or prosecutions brought by the Crown Prosecution Service (CPS) or equivalent. I believe that save for three cases involving four defendants, POL ceased prosecuting cases related to Horizon before I joined POL. However, through my involvement in the ICRAMs, I would have been aware of the fact that POL had historically brought private prosecutions against individuals. I believe that my knowledge of the prosecutions being an abuse of process and convictions unsafe, with inadequate investigation and/or that full and accurate disclosure was not made, would have originated from reading the Court of Appeal Criminal Division *Hamilton & others -v- Post Office Limited* summary judgment in April 2021 (the "**Hamilton Judgment**").
48. The Inquiry has provided me with [**POL00040517**] which are talking points for Jo Swinson MP during the Westminster Hall Debate. The talking points state, "*Since POL separated from RMG (1/04/12) Prosecution decisions have been made by external lawyers i.e. solicitors and Barristers*". Although my role included me having various interactions with various internal and external legal advisors, I can confirm that I was not involved in overseeing the work done by external lawyers regarding prosecution decisions.

SECOND SIGHT AND THE INITIAL COMPLAINT REVIEW AND MEDIATION SCHEME

Initial Complaint Review and Mediation Scheme (ICRAMS)

49. Second Sight were a firm of independent forensic accountants who were initially appointed by POL in July 2012 to conduct an independent investigation into Horizon. Second Sight's appointment was supported by Members of Parliament. Following Second Sight's Interim Report in July 2013, Second Sight's remit changed to reviewing the individual complaints of Postmasters through the ICRAMS. The ICRAMS was developed jointly by POL, Second Sight, the Justice for Sub-postmasters Alliance ("**JFSA**"), and overseen by a Working Group Chaired by Sir Anthony Hooper. By the time I joined POL in September 2014, the ICRAMS was already established and the window for applications had closed.

50. My recollection of the process was as follows:

50.1 First, POL would re investigate and review the facts and circumstances of each case admitted to ICRAMS. The reports produced by this team were called Post Office Investigation Reports ("**POIR**").

50.2 Then Second Sight would use the POIRs to conduct an independent assessment of the facts and produce their own report, a Case Review Report ("**CRR**"), with their recommendation of whether they believed a case would be suitable for mediation.

50.3 The CRR and its recommendation would then be passed to the Working Group, which would discuss which cases should or were capable of being mediated. The Working Group included the Chair, members of the JFSA, POL, and representatives from Second Sight. I did not attend the Working

Group. The Chair, Sir Anthony Hooper held the casting vote when there was disagreement and was appointed as Chair on the recommendation of the JFSA.

51. Mediations were planned and conducted by the Centre for Effective Dispute Resolution (“CEDR”). The mediations would be attended by the CEDR mediator, a representative from POL with the operational know-how behind the running of a Post Office branch and a legal representative from WBD. Applicants were also allowed to bring legal representation to the mediation. I did not attend the mediations. Provided below is a table which I believe to set out the outcome for each of the 150 applications that were made to the ICRAMS [POL00235243].

Applications to the Scheme		150
Applications rejected (ineligible)		4
Cases resolved prior to entry into the Scheme		10
Cases accepted into the Scheme		136
No. of cases not suitable for mediation: 48	Cases POL found unsuitable for mediation	42
	Cases the WG found unsuitable for mediation	2
	Cases closed owing to a missing / ill applicant	4
Residual		88
No. of cases suitable for mediation: 88	Cases resolved during investigation	5
	Cases resolved prior to mediation meeting	4
	Cases resolved at mediation	22
	Cases not resolved at mediation	22

	Cases referred to CEDR for mediation by POL which will not be mediated, owing to the Applicant's decision	35
Residual		0

52. As explained above, by the time I joined POL, Second Sight had already been appointed in 2012 and their terms of reference had already changed following the establishment of ICRAMS. On that basis, I was not involved in the decision-making process, the terms of reference, or contract with Second Sight, as it all predated my time at POL.
53. However, I was involved with POL's response to requests for information from Second Sight and supporting their investigation. Where Second Sight would request documents or information, and after POL confirmed access was approved, I would then facilitate the access to the correct documentation or subject matter experts. In my role, I was asked to assist Second Sight with finalising their Part Two Report. This included setting up a business wide meeting between Second Sight and subject matter experts, and then following up with colleagues over email and liaising between all parties for outstanding questions. Various examples of me seeking answers to questions posed from across POL are at [POL00216092], [POL00221743], [POL00221759], and [POL00312099].

Project Sparrow

54. Project Sparrow was the internal project name for the ICRAMS [POL00152996]. It was, in effect, the team that produced the POIRs along

with the team whose primary functions were to act as the Secretariat for the Working Group (during its existence), progress cases through ICRAMS and arrange the mediations for those that proceeded to mediation. As a member of the latter team within Project Sparrow, it was also our responsibility to support with the production of papers and ensure the Working Group had all the papers they needed to take a view on whether a case was suitable for mediation. I do not believe these teams had any particular decision-making role or authority and the material decisions relating to Project Sparrow were taken at the Working Group level or through the POL Board or its Subcommittee. I did not attend either of these meetings, but I would have seen and provided my views on the papers I had sight of, and which would have been taken to the relevant committee.

55. When I joined POL, I came into the organisation to support the Secretariat. Initially, I produced case trackers (which have been withheld by POL due to personal data reasons), budgets, and cost forecasts. I also looked at some discrete issues that the team wanted analysis of, such as remote access, the invoices received from Second Sight, and case data more generally (e.g. the costs incurred by scheme activity). Initially my role was more administrative, such as being responsible for version control, producing data, capturing key details of each case on a spreadsheet, and recording the themes of the complaints. As discussed above, I would also help to coordinate Second Sight's access to subject matter experts across POL and seek to obtain answers to their outstanding questions to enable Second Sight to finalise their Part Two Report. Subsequent to the changes in personnel referred to at paragraph 10 and shift in focus for the team, I was responsible for helping to

progress cases and navigate logistical issues. I was also asked to review Second Sight's reports and co-ordinate POL's response to the Part Two Report which is described in further detail at paragraph 63.

Second Sight

56. Shortly after I joined POL, I was sighted on an analysis of the first 10 CRRs produced by Second Sight [POL00153248]. I believe this analysis to have been conducted by PA Consulting. Within it at paragraph 1.5, it refers to Second Sight's signed letter of engagement dated 1 July 2014 and Second Sight's scope of services as including:

- *“Investigating the specific complaints raised by each Subpostmasters who has been accepted into the Scheme*
- *Acting independently in providing the Services and any assessment or opinion given by Second Sight shall be without bias and based upon the facts and evidence available*
- *Acting with the skill and care expected of qualified and experienced accountants*
- *Conducting the Services in an efficient manner and with a view to ensuring that the costs of the Scheme are reasonable*
- *Using its reasonable endeavours to comply with any deadlines or timeframes set by the Working Group”.*

57. It is this paper, I suspect, to be the reference included within the Board paper dated 17 September 2014 [POL00027363] and which refers to having already

addressed “*privately*” concerns regarding Second Sight’s “...*productivity, costs, quality of work and general engagement with Post Office.*” My reading of this paper is that it is clear POL was moving towards setting out its concerns in detail via a letter and at a formal meeting with Second Sight to discuss the improvements required, manage their costs and link productivity with payment, to incentivise Second Sight to work faster.

58. Following the circulation of the Board Paper dated 17 September 2014, I was likely sighted on Chris Aujard’s subsequent letter to Second Sight [POL00209725] of 24 September 2014 where he makes clear the dissatisfaction POL had with Second Sight, reiterating the points in his paper. It is clear from the Board Paper and this letter that at the point I joined POL, significant concerns were held by POL with regard to Second Sight’s productivity, quality of work product and value for money. This correspondence also makes it clear that these concerns were discussed internally (at Board level), within the Working Group Meetings and with Second Sight directly at meetings with POL.

Second Sight’s Independence

59. I have been asked by the Inquiry to comment on whether I thought Second Sight was independent in conducting its investigations. In order to answer this question adequately, I will not consider the fact that there was a contract, in which POL was paying Second Sight to run its investigation, as fettering Second Sight’s independence. I will treat that as a natural byproduct of a business using a third party to run an investigation.

60. Subsequent to Mr Aujard's letter of 24 September 2014, I believe I then prepared a briefing paper [POL00209883] for Mr Aujard ahead of the meeting with Second Sight on 30 September 2014. The purpose of this paper was to provide evidence for each of the points raised in the letter. The contents of this briefing paper also provided examples for some of the concerns POL had regarding Second Sight forming conclusions which were neither reasoned nor supported by evidence. I believe this will have been based upon [POL00153248], which will have been added to and finalised by the team, which I would have coordinated. The contents of the paper, which included evidence against each area of concern (rate of delivery, quality of work, manner of delivery and cost) will have informed my view on Second Sight's independence. For example, the paper records that Second Sight's conclusions were not seen to be reasoned or supported by evidence and that the quality of their CRR had been subject to minuted Working Group concerns over their style and quality. Further, Second Sight were failing to express what standard of proof they were applying in giving its opinion on disputed issues of fact.
61. Further to the concerns raised in September 2014 regarding Second Sight's quality of work, in an email to Mr Bourke on 21 November 2014 [POL00156544], I examined and explained a few of the mediation cases that showed Second Sight's lack of quality. I noted, *"I think the following cases evidence the lack of quality and critical reasoning behind their recommendations. Further they show a worrying tendency to appear willing to be swayed easily by [sic] less than compelling and un-evidenced assertions*

or special pleadings, including where these contradict the findings of a Court process.”

Strategies for Responding to Complaints about Horizon

62. I have been asked to comment on what, if any, policies or strategies were adopted by POL in responding to complaints made about Horizon, regarding the ICRAMS and more generally. I am not aware of any ‘policies’ adopted by POL in responding to complaints about Horizon, either within ICRAMS or more widely. However, I would suggest that POL considered and then acted upon various options available to it to progress cases through the ICRAMS quicker; seek to defend the claims made against it during the Group Litigation; and how it responded to enquiries from media outlets. Taking these in turn:

ICRAMS options

62.1 **[POL00219827]** appears to be a draft version of a paper that would have informed a paper to be taken to Board. This paper makes clear that by January 2015 POL felt the ICRAMS was failing to satisfy all parties involved save for itself **[POL00219104]**. The paper cites unfavourable broadcasts, MPs withdrawing their support, the JFSA’s refusal to engage in meaningful discussions (which I assume to be in reference to at the Working Group) and appeals for the Department (BIS at this time) to intervene. The paper notes that *“there is a strong case that the Scheme no longer serves as an expedient and fair way to explore and, where possible, resolve a small number of individuals’ complaints...”*

62.2 It is against this backdrop that the POL team were asked to revisit and present back to Board the options and choices available to it with regards to the ICRAMs. [POL00149577] looks to be the set of slides that were prepared earlier on (November 2014) [POL00149576], when it is likely the team were first asked to consider by the Executive Committee (“ExCo”) POL’s options. This email chain aligns with my recollection that I was asked to produce the slides relating to “costs and scheme facts”, though I also recall producing the more visual of the slides relating to the “Impact & Risk Matrix”. Ultimately, the recommendation included within this slide pack is to “Carry on as we are”.

62.3 By January 2015, evidently, we were revisiting POL’s options and this is what resulted in the eventual decision to mediate all cases, save for those subject to a previous court ruling, to disband the Working Group (as it would no longer serve a purpose), and re-engage Second Sight on a piece rate basis. I do not believe I attended any of the associated committee level meetings at which this decision was taken, but consistent with the role I have described earlier, I would have been sighted on and fed into the papers that were prepared. [POL00352082] shows that I am asked to provide information regarding costs, which I do, for each of the five options being considered at that time.

Group Litigation

62.4 I have described at paragraphs 121-133 below my lay understanding of how the Group Litigation would work in terms of the sequencing of trials, the role of the PLSG and how it operated in respect of Decision Papers.

I do not recall an overall strategy being discussed or adopted for the litigation per se, save for proceeding in accordance with the legal merits of POL's arguments, as then thought. That said, a number of individual strategy papers were taken through the PLSG. Though not necessarily the definitive list, I am aware of the following such papers:

- PLSG of 14 February 2017 – Decision: Does Post Office agree with the recommended strategy set out in this paper? **[POL00025376]**
- PLSG of 11 September 2017 – Decision: Does Post Office support the general strategy set out below? **[POL00006497]**
- PLSG of 4 October 2017 – Briefing Paper: Update on case management strategy **[POL00006462]**
- PLSG of 16 October 2017: Noting Paper: Update on Litigation Strategy **[POL00006634]**
- PLSG of 17 January 2018 – Decision Paper: Does Post Office support the proposed strategy for the Court Hearing on 2 February 2018? **[POL00006481]**
- PLSG of 2 February 2018 – Noting Paper: Update on strategy for the Court Hearing on 2 February 2018 **[POL00006453]**

62.5 Having reviewed these papers again, it is those for meetings on 14 February 2017 and 11 September 2017 which I believe most closely align to an overarching strategy for the litigation as a whole **[POL00025376]**.

62.6 The paper of 11 September 2017 [POL00006497] sets out what was explained to us as the “general strategic direction that we recommend is adopted by Post Office”, noting it is “...not possible to make definitive decisions on future strategy at this stage as it will ebb and flow with outside events”. The paper records the ambition for the claimants to “...*abandon the claim or seek a reasonable settlement*” through a preference for focussing on the Postmaster contract as the first substantive issue to address in the litigation, seeking to have some claims struck out, and asking the court to order the claimants to value their claims more completely.

Communications

62.7 I don't recall a specific communications strategy being adopted but do recall a need to maintain confidentiality and not speak about individual cases. From the materials shared with me by the Inquiry I note that [POL00216579], which is dated 7 January 2015, includes within it a “Communications Analysis” and states within it:

“The communications strategy to date has focussed on providing measured and proportionate response to key audiences on the central allegation of faults within the Horizon system”.

POL's Response to Second Sight Investigations and/or Applications to ICRAMS

63. By the time I joined POL, the window for new applications to the ICRAMS had closed and those applicants which were accepted into the ICRAMS, from the 150 applications made, of which I believe there were 136, had all already been

accepted. I did not therefore have a role to play in responding to the applications that were made to ICRAMS.

64. Excluding individual CRRs, I believe Second Sight produced four reports, all of which save for its Part 2 Report of 9 April 2015 were produced prior to me joining POL in September 2014. As such, it was this report that I believe I sought to obtain answers to the questions they posed and support Post Office's Reply [POL00224571]. With regard to the substance of the "Reply of Post Office Limited to Second Sight's Briefing Report – Part Two", I believe [POL00224571] and [POL00313587] set out the approach adopted for producing POL's Reply. Within these emails, it would seem that I prepared an initial response, using the previous POL Reply to Second Sight's 21 August 2014 version of the Part 2 Report. The date of that POL Reply was 22 September 2014.

65. Within my email of 17 March 2015 [POL00040954] I state that "*Where possible and drawing from other docs (Scheme Report, Select Committee response, dossier etc) I have added and amended text where appropriate*" but note that "*Where I do not have the technical expertise / knowledge, I have left comments to indicate what additional paragraphs we need to formulae new lines for. Where indicated, I will chase the relevant people at PO and ask Angela – but could Bond Dickinson provide draft responses to the additional paragraphs as indicated or where you deem necessary?*"

66. I provided an update on 20 March 2015 [POL00040962], within which I state "*I thought it may be useful to share where we are up to in respect of our response to Part Two.*"

- *I have been through our original reply to their original report and tweaked & added words to cover, where warranted, any new assertions / points made over and above those included in their original report.*
- *Where I did not know the process / technical process aspects, Angela has fed in and Andy P is drafting some additional lines.*
- *Once this is complete, the report is (today) being shared with Paul Lorraine [who was a solicitor at WBD] who will sense check and double check that we have not missed anything important we need to rebut / comment on.*
- *I will then tidy up and share with Angela and Rod on Monday morning for proofing and legal sign off. Though everyone is welcome to read and comment”*
- *We should then be able to share a draft of our reply with SS (if we decide to – I am not sure we should but we can discuss). Note: the section on Foreign Currency Transactions may not be included by Monday as it needs to be drafted by Angela and Kath as it relates to M118”.*

Briefings

67. Categorically, for any elements of any briefings I contributed to or led on, I would not have purposefully “*not passed on*” any material. The briefings would have contained what I believed to be the relevant and important points for the individual or individuals to be briefed upon, as according to the purpose of their briefing and who had asked for the information.

68. During the ICRAMS, on occasion and when asked, I assisted Mrs Crowe with producing briefings (slides) for POL's ExCo in relation to projected costs, facts and figures [POL00149576]. I did not attend an ExCo meeting during Mrs Crowe's tenure and I believe the slides I prepared were for the purposes of Mrs Crowe (or someone else) to narrate and highlight certain issues, at their discretion.
69. On occasion, I would also contribute to the briefings prepared for Mrs Vennells. I would be asked to contribute or review sections about a certain issue (e.g. remote access) when further input was needed. Due to my involvement in the ICRAMS, I would also sometimes draft a section for inclusion in the CEO reports. These reports would have been spoken to by the CEO at Board.
70. Often, it would be the case that someone else would 'hold the pen' for briefings for the Shareholder Executive or Minister [POL00408646], but I would be asked about discrete points. For example, on 16 December 2014 Mr Bourke asked me to find some quotes for inclusion in a Shareholder Executive ("ShEx") briefing [POL00150296]. I would also add that I would at times be asked to edit and review briefing notes for the Board or Board Subcommittee [POL00216579]. Although the drafting could be done without my contributions, I would sometimes be asked to provide extra detail, which due to my involvement with the ICRAMS, I knew where to look for or had knowledge of. Very often, I contributed, reviewed, or offered my views and comments, but did not hold the pen on these briefings, nor did I attend the meetings when these papers were then spoken to.

71. Aided by documents provided to me by the Inquiry I can see that I provided my thoughts to Mr Bourke on what additional points could be considered for inclusion in a speaking note he required ahead of a meeting with Baroness Neville-Rolfe, for a meeting she had scheduled with Second Sight on 14 October 2015 [POL00356012].

Suspense Accounts

72. Having reviewed [POL00423922] my understanding is that POL uses suspense accounts in the following ways:
- 72.1 to house branch discrepancies arising as part of the normal course of trading and which need to be cleared at the period end (either surplus or deficit);
 - 72.2 to house surpluses arising from Postmasters where the Postmaster does not agree the surplus is due back to them; and
 - 72.3 to temporarily hold differences in payments moving between POL and its clients, where the client and POL's view of what is payable or receivable differ.
73. Differences are investigated but, in some cases, neither POL, the client, nor the branch are able to determine the identity of the customer who performed the transaction in question or the specifics of the transaction. For example, POL may not be able to determine the details of the bank account to be credited. In such situations, and following enquiries with branches, unresolved differences are moved to POL's customer creditor suspense account. Such

discrepancies are held in its suspense account to give time for customers and other parties to put forward more information to explain what has happened.

74. A long-standing assertion is that:

74.1 POL operates one or more suspense accounts in which it holds unattributed surpluses including those generated from branch accounts;

74.2 After a period of time, such unattributed surpluses are credited to POL's profits; and

74.3 POL therefore has recovered (through civil or even criminal proceedings) sums from Postmasters which were not real losses to POL, as they were housed in suspense accounts and ultimately taken to profit by Post Office.

75. I believe these allegations were first made in the context of the ICRAMS. Second Sight's final report, published in March 2015, said they had been informed that at each year end, substantial unreconciled balances existed on many individual suspense accounts and that these unreconciled balances for the 2014 financial year were approximately £96 million in respect of Bank of Ireland ATMs and approximately £66 million in respect of Santander. Second Sight stated that "*these unmatched balances represent transactions from individual branches that occurred in the preceding 6 months*" and they "*...remain concerned that these balances may include transactions that ultimately should be credited back to individual branch accounts*".

76. In its 'Reply' to the Second Sight Report, POL stated that Second Sight had misunderstood the information provided by POL. The balances of £96m and £66m were taken from routine trading balances yet to be settled with other

organisations at a particular month end. In other words, they represented amounts due to other parties, not amounts that were unreconciled and which may be due to Postmasters.

77. Second Sight were also provided with details of the credits released from POL's suspense accounts to profit for the period 2008 to 2013. As there was a 3-year retention period – no amounts at that time had been released for the years 12/13 and 13/14. The total gross credits released from suspense to profit from 2007/8 onwards were as follows:

Years released to profit	Value
2010/11	£612,000
2011/12	£207,000
2012/13	£234,000
2013/14	£104,000
2014/15 (YTD at the point provided)	£8,000

78. In its reply to Second Sight, POL stated that amounts should be considered within the overall context of POL performing around 2.5 billion transactions per annum, with a combined value in the order of £60bn. The amount of unresolved credits that end up in POL's profit and loss account (at the time) was therefore less than 0.001% of all transactions (by value) undertaken by branches.
79. Allegations continued to be made in respect of POL's suspense accounts. In February 2020 Lord Arbutnot met with and wrote to Nick Read. In Mr Read's

response, he committed to better understanding how POL operated its suspense accounts.

Deloitte Review

80. Deloitte's work with regards to how POL operated its suspense accounts was, like a number of the recommendations included within the Chairman's Review, subsequently taken forward as part of POL's preparations for the Group Litigation.

81. I have been provided with [POL00241514] which provides a very high-level summary of the work Deloitte were asked to perform as a result of Recommendation 8 of the Charman's Review. Within this draft email, which was to be sent to Mr Parker in May 2016, it records:

"Suspense Accounts – You will recall that Deloitte are also conducting the work, recommended by Jonathan Swift, into the existence and nature of the relationship between POL's suspense accounts and specific branch accounts over the relevant period. This a materially different exercise to the IT testing, since I understand that most of the relevant accounting processes were/are based paper records and manual reconciliations. Deloitte's informal and provisional view, based on the scoping exercise but before any more substantive work is undertaken, is that POL's systems and controls in this area may not have performed as well as they might. We will shortly be having a specific meeting with Deloitte to discuss this area of work to understand their concerns".

82. A briefing note I prepared **[WBON0001080]** ahead of a meeting with Alisdair Cameron, POL's then CFO, on 17 May 2017, describes the allegations being made by the Claimants and that Deloitte had been asked to investigate: the universe of suspense accounts that are or had been operated by POL, the processes in place to control the operation of these suspense accounts, and to test these processes and controls for the 'most material' suspense account.
83. A further briefing note **[POL00408769]**, prepared for a subsequent meeting with Mr Cameron on 6 July 2017, references what was agreed at the meeting of 17 May 2017 and sets out the proposed next steps. It reads as follows:

"At our previous meeting on 17 May, we discussed the findings of Deloitte's investigations into the processes that are in place to control the operation of accounts for which POL places sums, that could relate to discrepancies at branch level, and from which unmatched sums are taken into the P&L account.

It was agreed that once we had profiled these 119 accounts, according to the volume and value of the transactions that have been taken into the P&L account, we would return to agree with you the next steps.

Appended to this paper is the list of 96 accounts (from the 119) that have, from 2010 - 2017, taken sums to P&L, ordered by the total value of these transactions. Please note that this list is still in the process of being quality assured by both Paul Smith (FSC) and Deloitte.

Paul Smith is also reviewing this list of accounts to provide a view on which accounts he believes should form part of the 'sample testing' described below.

Bond Dickinson are providing a list of the Claimants along with the branch(es) and the period(s) of time to which their allegations relate.

Proposed Next Steps

Our intention is to sample test sums taken to P&L from the most pertinent account(s) to prove their legitimacy.

Which account(s) will be sample tested will be based upon the volume and value of the transactions that have been taken to P&L, coupled with people's knowledge of the types of transactions that flow through these accounts. For the agreed account(s), we intend to focus the sampling on transactions that relate to branches and periods of time relevant to particular Claimants and their allegations.

It is also our intention to establish for as many of the Claimants as possible that, for the periods of time to which their respective claims relate, no amounts relevant to their branch(es) were released to P&L.

Further, to give a sense of scale, we are currently attempting to establish the volume and value of sums going in the opposite direction from these 96 accounts i.e. being credited back to branch".

84. My recollection is that the goal for this piece of work was to be able to show, for each claimant within the GLO and the period(s) of time they operated the branch(es) in question – the extent to which sums of money were taken to

POL's profit and loss, via a suspense account. This is consistent with the information included at [POL00024771] and [WBON0001163].

85. This work was being done in preparation for the subsequent breach trials I describe at paragraph 122 but ultimately it was never completed. This is because of settlement being reached in December 2019 (i.e. the Breach Trials would no longer take place) and an issue with data extraction as is recorded in an email from Deloitte [POL00460649]. Attached to this email is also, what Deloitte believed to be the latest draft version of the report, ahead of the work not being taken forward. Within this draft is the proposed methodology and logic but also an explanation of some of the data, technical and knowledge related challenges encountered with POL's suppliers: Fujitsu and Accenture.

KPMG Reviews

86. As referenced in [POL00423922], in mid-2020 and subsequent to Mr Read's meeting with Lord Arbuthnot, KPMG were instructed to review how POL currently operated its suspense accounts. The scope of this review was as follows:

- 86.1 Confirm the number of relevant suspense accounts operated by POL into which sums are placed which could, theoretically, relate to discrepancies at a branch level and from which any unmatched sums may be taken into a Profit and Loss (P&L) account.
- 86.2 For these accounts, assess whether how they are operated reflects the associated documentation and best practice.

- 86.3 Identify whether there are any gaps / challenges within existing processes which could result in risk to POL and or Postmasters.
- 86.4 Assess whether the current resolution criteria adopted by Post Office for dealing with discrepancies appears 'fair and reasonable' to both Post Office and Postmasters, based upon KPMG's understanding of best practice.
- 86.5 Comment on any further work that Post Office might want to consider.
87. KPMG findings were presented to POL's Audit & Risk Committee ("**ARC**") on 27 July 2020. I drafted the papers that were presented to the ARC and explain their findings below. KPMG had identified four relevant suspense accounts which were currently operated by POL; details of which were provided within a table in the paper. KPMG's summary finding was that, given the robust and transparent investigations process that were undertaken, these suspense accounts should not result in POL pursuing Postmasters for sums it had or could eventually take to profit.
88. This was because sums housed in these suspense accounts:
- 88.1 are either not taken to a profit and loss account; or
- 88.2 relate to unmatched transactions due to customers (not Postmasters); or
- 88.3 relate to surpluses rather than shortfalls.
89. For completeness and although purely hypothetical, included at Annex 1 of the associated ARC paper [**POL00423922**] was a worked example for how a postmaster could repay a shortfall which POL had or eventually could take to

profit via a suspense account. POL was not aware of any examples of this having taken place and it was said to require, for example:

- 89.1 a Postmaster not following process;
- 89.2 refunding a customer, prior to an investigation taking place and without contacting POL;
- 89.3 not recording the refund on Horizon; and
- 89.4 not recalling the refund during the subsequent investigation.

Owing to its nature therefore, the paper noted that it would be extremely difficult, if not impossible, for POL to prevent.

90. The KPMG report included a number of points to consider in terms of how POL could improve its operation of suspense accounts to enhance best practice. These included:

- 90.1 Implementing and documenting policies and procedures including details of ownership, format, content and version control for all relevant suspense accounts.
- 90.2 Ensuring all processes were adequately documented and that policies are consistently applied within the documentation.
- 90.3 Implementing an overarching branch discrepancy process document linking all relevant policies and processes.
- 90.4 Formalising the reporting and review by senior management of suspense accounts and investigation outcome metrics.

- 90.5 Undertaking a review of the branch deficits written off centrally to identify whether any Postmasters are regularly benefitting from the policy.
- 90.6 Reviewing the policy and process for branch surpluses with specific focus on:
 - 90.6.1 Communicating surpluses to postmasters.
 - 90.6.2 Repayment timescales not being determined by value.
 - 90.6.3 Timeliness of investigation process.
 - 90.6.4 Aligning the branch deficit and branch surplus policies and expectations.
- 90.7 Implementing a process to address the current backlog that had arisen in the investigation of branch surpluses and the resolution of old branch surpluses that are in dispute to ensure:
 - 90.7.1 Repayments are made in a timely manner; and
 - 90.7.2 Where appropriate, amounts are moved into the Agent Creditor Account.
- 91. Though not the accountable business owner for the areas of the business to which these recommendations relate, my recollection is that all recommendations were taken forward and implemented through business as usual (BAU) over the course of the 20/21 financial year.
- 92. KPMG were then also instructed to perform a review into POL's historical operation of suspense accounts. I recall thinking it was important for KPMG to be sighted upon the work Deloitte had begun but not completed, as part of POL's GLO's preparation. With permission obtained from Deloitte, a grid

setting out the various engagements had with Deloitte regarding suspense accounts, along with the associated work product, was shared with KPMG on 30 September 2020 and 16 October 2020.

93. As referenced in **[POL00030907]** the scope of KPMG's review of POL's historical operation of suspense accounts was as follows:

93.1 Conduct research into historical suspense account operating practices pre-March 2019, holding discussions with key individuals and reviewing relevant documentation (where still available) to:

93.1.1 Identify any additional relevant suspense accounts to the 4 which were identified during KPMG's review of POL's current operation of suspense accounts.

93.1.2 Identify any changes in the suspense account operating processes during the relevant time period, which would significantly alter the way the identified accounts operated and whether these changes could have potentially had an adverse impact on the Postmasters; and

93.1.3 Understand whether the historical resolution processes adopted by POL for dealing with amounts posted into these suspense accounts were sufficient to identify potential instances where amounts should have been reconciled against branch discrepancies made good by Postmaster.

93.2 Undertake historical analysis of balances held within the relevant suspense accounts for the relevant time period (where data was still

available) to establish whether postings to these accounts have altered, and if so the potential impact.

- 93.3 Perform a high level review of the Tier 2 investigation data arising over the past 12 months to inform their understanding of how amounts could get posted to the relevant suspense accounts.
94. The findings of KPMG, from its review of how POL operated its suspense accounts historically was presented to the ARC on 24 November 2020.
95. The associated paper noted that KPMG's review into the historical practices did not identify any additional relevant suspense accounts to those which formed part of their review of current practices and that KPMG were informed by POL employees, including the product team leaders responsible for posting amounts to the relevant suspense accounts, that no changes had been made in the operating processes since they had been established. However, no formal documentation was found detailing what operational processes were or were not in place.
96. As such, KPMG's overarching finding from its review into how POL currently operates these suspense accounts was said therefore to also apply to the historical operation of these suspense accounts, though it was also recognised that, POL's investigation into discrepancies had evolved and improved, with the introduction of the Tier Two Investigation Team.
97. The two relevant suspense accounts identified by KPMG were the Agent Creditor Suspense Account ("**ACSA**") and the Customer Creditor Suspense Account ("**CCSA**"). Taking these in turn. The paper described how:

97.1 The ACSA holds surplus discrepancies which Postmasters (as opposed to POL) dispute being due back to them. In respect of this account, KPMG's finding from its review of historical practices was that it had seen no evidence to indicate amounts posted to this account related to shortfalls which should have been repaid to Postmasters.

97.2 The CCSA should only have items posted to it once it had been determined that they related to outstanding customer funds (as opposed to Postmaster shortfalls). Thus, branch affecting discrepancies should not be included within this account, which is a holding account for customer's money. KPMG's finding was that overall, a robust resolution process appeared to have been in place for each product type that is posted into this account. This process identified instances where amounts needed to be reconciled against branch discrepancies prior to them being posted into this account. However, KPMG identified two exceptions:

97.2.1 Where Postmasters had accepted cheques made out to Post Office as payment for certain services but had incorrectly recorded this transaction as having been paid for in cash and the supporting information (which would include branch details) also then became separated from the associated cheque when the Postmaster sends the cheque to the Post Office Cheques Team to process ("**Post Office Bulk Cheques Issue**").

97.2.2 When, between November 2015 and April 2019, Postmasters failed to follow the then prescribed two-part cancellation process for MoneyGram Transactions, which also coincided with unrelated connectivity issues ("**MoneyGram Issue**").

Each of these were discussed in further detail within the ARC paper.

98. The KPMG report and paper for ARC noted that the CCSA was established in April 2010 and the ACSA was established in January 2012. Prior to the establishment of the ACSA, such surpluses remained on Postmasters personal accounts, which were not released to POL's P&L account and remained on that account until claimed by a Postmaster. Prior to establishment of the CCSA, the Client Creditor Suspense Account was used to house unmatched customer monies (as well as unmatched client monies). KPMG performed a high level review of transactions posted to Client Creditor Suspense Account from 2005 (the earliest date for which data is available) to 2020 and held discussions with the relevant POL employees who managed this account. Limited documentation was available for the Client Creditor Suspense Account prior to 2018, but no further potential issues to those noted above were identified by KPMG.
99. KPMG's findings, which I summarised in the papers referenced above, is representative of my knowledge of the investigations into POL's suspense accounts.

Disclosure Obligations

100. Herbert Smith Freehills LLP ("**HSF**") and Peters and Peters ("**P&P**") were asked to advise whether the findings and the KPMG reports were disclosable as part of Post office's ongoing disclosure obligations to those it had prosecuted historically and as part of any future claims made against Post Office as a result of historical practices, in both a civil and criminal context

[POL00460657]. I do not believe POL to have waived privilege over this advice.

101. From reviewing **[POL00030907]**, I recall that KPMG advised that further investigation into these two potential issues was difficult given the lack of available data held within POL and was unlikely to add any further information especially in relation to quantification to that already included in their report. In respect of the MoneyGram Issue, this is because of the time that had passed, personnel which had since left the organisation and lack of documentation which existed / had been retained / was ever produced. In respect of the Cheques Issue, KPMG's understanding was that it is not possible to identify what proportion of the £134k (that had been posted to the CCSA as a result of the Cheques Issue) is made up from matching errors, customer losses or potential Postmaster losses due to the lack of available supporting information documented on the cheque in question. This is explained in further detail within **[POL00030907]**.

102. Although POL's operation of suspense accounts did not feature in the original terms of reference for Inquiry (which was on a non-statutory footing at that point) - subject to obtaining legal advice, the ARC was asked to approve disclosing KPMG's findings in full to the Inquiry. This was to provide the Inquiry with a level of comfort that POL had not been improperly recovering shortfalls from Postmasters which were housed in its Suspense Accounts, as had been alleged. The Chair of the ARC felt this was a decision for Board, who subsequently approved the recommendation.

103. By this stage POL had received a number of questions from the Inquiry regarding “Branch Suspense Accounts and Trading Statements”. Subsequent to receiving approval from Board, POL went further than just providing responses to the questions received from the Inquiry and also disclosed the KPMG Reports. Within an email I sent to Declan Salter (who was POL’s Historical Matters Director at the time) on Friday 4 December 2020 [POL00460656], I noted that by disclosing KPMG’s reports:

- *“Post Office will demonstrate a genuine willingness to engage with, and aid the Inquiry.*
- *It will allow Nick Read to demonstrate that he has discharged the commitment he gave to Lord Arbuthnot in February to better understand how Post Office operates its suspense accounts.*
- *It will enable Post Office to get ahead of the curve and relieve the business from having to service further questions on this topic in the future, which otherwise seems likely.*
- *It will demonstrate to Sir Wyn that Post Office has not, as has been alleged, been improperly making a profit from the operation of its suspense accounts – as has been an assertion made regularly since 2012 (ish)”*

104. Subsequent to drafting the Papers for the ARC [POL00030907, POL00423922], I recall confirming with KPMG that they were happy the contents accurately reflected their reports prior to submission. I also recall seeking and receiving the legal advice from both HSF and P&P regarding whether any disclosure obligations were triggered by the findings and contents. I believe all recommendations that KPMG made in relation to our

current operation of suspense accounts were tracked and taken forward accordingly.

Email from Jarnail Singh

105. I have been asked to consider [POL00040516] and the attachment [POL00040517]. This is an email from Jarnail Singh to Mr Bourke on 17 December 2017 with an attachment. I am not aware of any documents relating to ICRAMS being destroyed, and I can say with certainty that I have not destroyed any documents.

Project Zebra

106. I have been asked to comment on my involvement or awareness of the instruction of Deloitte on Project Zebra. I can confirm that I believe I first became aware of Project Zebra when I was collating documents for Mr Swift KC, as described in paragraph 115.

POL'S RESPONSE TO COMPLAINTS FOLLOWING THE MEDIATION SCHEME

107. I have been asked to summarise the extent to which I was involved in POL's responses to concerns raised by sub postmasters, MPs and journalists. As the Inquiry will be aware, the ICRAMS involved a re-investigation of complaints previously made by Postmasters. This took the form of the aforementioned POIR. I recall Second Sight including within the Part 2 Report their "...*appreciation for the hard work and professionalism of Post Office's in-house team of investigators, working for Angela Van Den Bogerd...*", "...*our work would have been much harder and taken much longer without the high quality work carried out by this team...*" [POL00226185]. I had no involvement

in the conduct of these re-investigations. I would however consider myself to have been part of the team that supported the Working Group and which Second Sight said, *"We have also received excellent support from the administrative team set up by Post Office to support the Working Group"*. More generally, and with regards to responses to concerns raised by MPs and journalists, I cannot recall any specific times when I was asked to lead on responses, but I suspect I would have been asked to contribute and feed my thoughts in to POL's responses, based upon my understanding of the facts at the time.

108. The extent to which I was involved in briefing the POL board and senior managers on the integrity of the Horizon IT system is covered above in paragraphs 67 onwards. One such example is at **[POL00162583]** where Mrs Corfield and I worked together to amend a briefing note prepared for the then Chairman, Mr Parker.
109. With regard to journalists and other media (including BBC panorama) running or proposing to run stories on Horizon, as noted above, I would expect my involvement to have been limited to contributing, reviewing, and offering my view, but not being the primary drafter. Insofar as they existed, I do not recall regularly attending any communications related decision-making committees nor was I part of the communications or press team (though I would of course engage with them on a regular basis as part of my role). With specific reference to the BBC Panorama programme, the document I have been asked to consider by the Inquiry, **[POL00139184]**, sets out some example responses for a colleague to consider deploying, if the assertions included within the 2015

Panorama Broadcast were raised during an upcoming mediation. As is noted within the email chain, these were based largely upon what an employee at Fujitsu had told us. I did not attend any of the meetings with the BBC.

110. The Inquiry has also specifically asked me to consider **[POL00318987]** and explain my response to Mr Davies' observation that Baroness Neville-Rolfe "*is unconvinced by our rebuttal to the Panorama programme.*" I note my email response on 6 August 2015 is "*Fantastic – thanks.*" I suspect my response was actually in relation to the point also included within Mr Davies' email where he notes "*Jane and Paula did a v good job*". I would certainly not have meant it was "*fantastic*" that Baroness Neville-Rolfe was unconvinced by the rebuttal.

THE CHAIRMAN'S REVIEW

111. Mr Swift KC was instructed to assist POL's then Chairman, Mr Parker, to review the adequacy of the ICRAMS and POL's handling of the complaints made by Postmasters. Internally, I recall this work being referred to as the "Chairman's Review" (however, I note the Inquiry has referred to it as "The Swift Review"). Broadly speaking, I believe that it ran from September 2015 until June 2016 and was stood up subsequent to Mr Parker receiving a letter from Baroness Neville-Rolfe **[WITN10010104]** (who was the Postal Minister at the time), in which he was asked to undertake a review.
112. I have been asked to consider **[POL00233179]**. Though I do not specifically recall the email chain, it looks to be a set of draft speaking notes prepared for Mrs MacLeod ahead of an early meeting with Mr Parker regarding his review. I am asked to comment on the draft speaking notes, which I do, though this is limited to what the review could still achieve (instilling confidence), if its

findings did not deliver against the expectations of key Parliamentarians. I cannot recall exactly why I was sent these notes to review, other than that I likely would have attended the meeting on 23 September 2015 where Mr Bourke and Mr Williams discussed this upcoming review. My suggested amend is a product of me actively listening in the meeting and ensuring that nothing discussed was missed off in Mrs MacLeod's notes.

113. I have also been asked to consider [POL00153429]. Though it is evident from this email chain that I shared my thoughts on what the focus and scope of the Chairman's Review was, the instructions to Mr Swift KC are clear in that ultimately it was he who was asked to advise Mr Parker regarding "*the scope of the review and how this is framed*". Regarding the instructions themselves, I do not believe I would have drafted them. Although I have not been provided with documents by the Inquiry to evidence this, it is likely that I would have seen draft versions of the instructions prior to them being sent to Mr Parker and Mr Swift KC, for their consideration. As part of this process, I would have also likely shared with colleagues any thoughts and views on drafting points I wished to be considered ahead of them being finalised and sent.

114. I am aware that the chronology I produced in October 2015 and continued to refine thereafter, as referred to in paragraph 45 above, was provided to Mr Swift KC as part of his initial briefing and suite of background materials. This was in conjunction with correspondence with Mrs MacLeod and a conference that took place with Mr Parker, again in October 2015.

115. Although I have not been provided with documents from the Inquiry to demonstrate this, my recollection is that whilst being part of the POL team

assembled to assist Mr Swift and Christopher Knight with the Chairman's Review, we primarily assisted through providing them with information and the documents they requested, providing access to individuals they wished to speak to, and arranging on their behalf the associated meetings. I do recall having more interactions with Mr Knight, albeit primarily over email, and most probably as he was the junior barrister working on the Chairman's Review, rather than speaking directly to the King's Counsel for each request or meeting.

116. Throughout the duration of the Chairman's Review, I believe Mrs MacLeod provided weekly or fortnightly updates to Mr Parker via email, which were supplemented by verbal briefings. An early example and draft version of an email update, for Mrs MacLeod's consideration ahead of sending to Mr Parker is dated 30 October 2015 **[POL00153429]**. Mr Bourke prepared a first draft, which he asked me to review **[POL00153429]**.
117. Following Mr Parker receiving a draft version of the report on 10 January 2016, I reviewed the Chairman's Review. Having reviewed **[POL00238693]**, it is apparent that my comments were not substantive but rather, many were regarding grammatical errors and syntax, correcting factual inaccuracies, typos, and suggesting amends in the drafting. From memory, I believe these suggestions were accepted by Mr Swift KC.
118. Mr Swift KC issued his final version of the report on 8 February 2016 **[POL00022635]**. It included within it 8 recommendations.
119. I was involved in taking forward recommendations 3, 4, 5, 7, and 8 **[POL00022635]**. Recommendations 3, 4 and 5 were taken forward by way of

engaging Deloitte, for whom I believe I acted as POL's lead, enabling them to produce their Project Bramble Report (the latest version of which is dated 19 January 2018). Similarly, I believe I acted as POL's lead for discharging recommendation 7, by aiding WBD in its production of a report dated 4 May 2016 and which Mr Swift KC confirmed as being a "*thorough job*" and that it "*meets the recommendation in the report, and what could reasonably be done in this regard has now been done*" [POL00024741]. Regarding recommendation 8; again, Deloitte were engaged to take this forward and this is covered in detail at paragraph 80.

120. I was made aware on 12 April 2016 that POL had received notification from Freeths LLP that they had filed a claim against POL in the High Court on 11 April 2016 on behalf of 91 claimants, including Alan Bates [POL00390517]. This email chain indicates that I arranged and attended a meeting on 12 April 2016 where I can see from the same email chain it was at this meeting consideration was given to whether, in light of this development, the work being taken forward by Deloitte should stop and Mr Swift KC be asked for his view / advice.

GROUP LITIGATION

121. In respect of the group litigation, as explained above in paragraph 120, I was part of an initial group of people with whom Mr Williams shared Freeths LLP's letter on 12 April 2016 [POL00390517]. Mr Williams shared the letter with Mrs MacLeod, members of the Communications Team, Mrs Vennells's Chief of Staff, Mr Bourke and me. I arranged and attended the initial meeting later that day during when, I suspect, we discussed some of the points included within

Mr Williams's email of 12 April 2016, regarding, for example, its implication on the work being taken forward to address the recommendations made by Mr Swift KC. I can also see from this email, that at this stage we had very little information about what the claim included and who the claimants were.

122. The litigation was significant and complicated, but at its highest level, my lay understanding was that the Common Issues Trial would determine the meaning of the Postmaster contract and the obligations which fell on POL to discharge and those which fell on Postmasters. This would be followed by a trial regarding the adequacy (or not) of the Horizon computer system which would be technical in nature and involve expert evidence. With the 'meaning' of the Postmaster contract settled and a determination on whether or not the Horizon system was fit for purpose, a series of 'breach' trials could follow – though ultimately these did not occur owing to settlement being reached in December 2019.

123. As I have throughout my time at POL, I was involved in various pieces of work during the Group Litigation, whilst supporting the litigation itself. Regarding the litigation, I believe my primary role was as a member of the Postmaster Litigation Steering Group (“**PLSG**”), which I explain further at paragraph 130 below. In addition to being a member of the PLSG, to assist the Inquiry, I have listed some of my additional responsibilities:

123.1 I frequently acted as a conduit between POL and WBD, to ensure that instructions could be requested, given and received. For example, on 14 December 2017, Mr Parsons emailed Mr Williams and me with a draft PLSG paper on the long-term strategy and a draft letter to Freeths LLP

[POL00041593]. My response shows I helped to facilitate instructions to WBD in a timely manner and, shared my view on internal sign off requirements. Another example is provided via **[POL00241025]**, where although I attended a meeting with Mr Parsons, Mr Williams, and two other lawyers from WBD - Gavin Matthews, and Elisa Lukas. My only action point was to circulate a “*time bar*” letter. I believe this was shorthand for providing some examples of the previous public statements POL had made regarding not relying upon limitation periods. Later, on 20 April 2016, I circulated some examples **[POL00041136]**.

123.2 I was heavily involved in the administration, sequencing, organisation, and facilitation of the PLSG, along with participating in its collective decision making. I was included on email chains with the PLSG as a member of the PLSG, but also to arrange the agenda and documents required for the efficient and productive running of those meetings **[POL00023013]**. By way of example, on 8 July 2016, Mr Williams suggested that, “*If you have any other items to add to the agenda, or any questions generally, please let me know (copying Mark Underwood, cc’ed, who will help coordinate as necessary*” **[POL00024988]**.

123.3 Due to the nature of my role, I was copied into most things regarding the PLSG. My approach was, and remains, that if I was copied into something I would seek to read it and then if I had questions, I would ask them. An example of this is at **[POL00024165]**. I believe I was included in the distribution list of this email, because I had to know what was happening in order to be able to arrange the PLSG and understand what papers were

required for the meeting. I would also then be able to flag things to Mr Williams and Mrs MacLeod which I thought they would need to read, respond to, or brief others about. Lastly, I hoped I asked sensible questions which, if I did, would then help shape the subsequent papers that needed to be drafted and taken to the PLSG.

124. From memory, WBD led POL's disclosure exercise, based upon the model ordered by the Court. I believe I was WBD's principal point of contact within POL for access into the business subject matter experts and would, for example, co-ordinate meetings between WBD and the POL teams that were required, particularly in relation to data extraction exercises. I recall arranging a meeting early in the litigation that was attended by WBD, Millnet and POL's Data Protection and Information Security Teams ahead of extracting data from POL's systems. Further detail is provided at paragraph 142.

125. I note I am recorded as being the joint author of the GLO – GC Briefing Note - **[POL00253137]**. During the Group Litigation, there were a vast number of papers and emails produced which were rich in content. I also attended the PLSG. Though not legally trained, I believe I had a reasonable lay understanding of what was going on. Briefings being reviewed by individuals with a lay understanding is a helpful way to test whether the drafting is too technical, or as per the goal, easy to understand, or not. Often, the briefings I prepared would be produced by 'stitching together' content from pre-existing material.

126. With regards to POL's preparation of lay evidence, I do not recall being involved in any of the strategic decision making. I was involved in arranging

pastoral support for witnesses and arranging accommodation for the duration of the Common Issues Trial. I cannot recall exactly when, but it is likely I did receive a copy of the witness statements before they were filed. The statements were probably circulated to me for awareness purposes, rather for any substantive input from me, which I am confident I did not provide for any.

127. I do recall being asked to attend the interviews held by POL and WBD to select an expert. I attended those interviews not as a subject matter expert but probably owing to Rob Houghton (POL's then Chief Technology Officer) not being able to attend all of the initial interviews and WBD and POL valuing my view. Mr Houghton did however subsequently meet with Mr Worden, when it became apparent that POL's preferred candidate (Gill Hunt) may have had pre-existing commitments. Although I have not been provided this document by the Inquiry, it is likely that the decision of who POL ultimately chose as their expert would have been a decision made by the PLSG, subsequent to a Decision Paper drafted by WBD. I have been shown **[POL00266141]**, which is an email chain between Mr Parsons, Mr Williams, Mrs Van-Den Bogerd and me. This chain is simply me processing the information Mr Parsons has passed to us and asking follow up questions to confirm my understanding of the situation along with the subsequent steps to be taken.

128. With regards to the decision to seek that Fraser J recuses himself, I was not involved in instructing Lord Neuberger nor Lord Grabiner, nor this decision more generally. By virtue of working closely with those who were advising the decision makers, I was generally aware of the decision being taken to the Board. The Inquiry has provided me with **[POL00359886]**, which having

reviewed, I can see I was made aware of the claimants' statement of costs and shared thoughts regarding POL's statement of costs, in response. This would have been something that naturally came to my desk due to my ongoing work with POL's finance teams on POL's budgeting and cost forecasting, as explained below in paragraph 149.

129. I did not own the relationships with nor was I responsible for keeping the Board or government informed regarding: POL's general litigation strategy; its approach to the disclosure of documents; its preparation of lay and expert evidence; the recusal application. I would not have been directly interfacing on a regular basis with members of the Board or government with regards to these issues. I would have contributed to and prepared papers, briefings and PowerPoint slides which would have gone to the Board and/or government, but I would have rarely attended these meetings and in circumstances where I did, I would not have spoken to these materials.

130. I have been asked to set out who was responsible for decision making in relation to POL's conduct in the Group Litigation. My recollection is that initially the PLSG was the POL governance forum from which WBD received instructions on material items. The internal 'client' was the network / retail team and I recall Kevin Gilliland (then the CEO, for Retail) originally being asked to chair this meeting, though he delegated this role to Thomas Moran (Network Development Director). I understood the internal and external legal teams' role to be one of advice regarding legal risk, whilst that of PLSG members' and its Chair were to provide instructions to these legal teams', having considered the advice – which usually took the form of decision papers drafted by WBD and

which often included a recommendation. The PLSG was comprised of senior colleagues from across POL who had the authority and business experience to provide instructions sought and make the necessary decisions. Typically, WBD would prepare the decision papers, which I would often review with Mr Williams before they were shared with PLSG members ahead of each meeting. The papers would seek to set out what decision needed to be made and include the relevant information and context surrounding the decision, with, ultimately, a summary of the risks and associated issues PLSG members needed to be aware of. From my recollection, more often than not, but not without proper debate, the PLSG would follow WBD's recommendation and the legal advice. The decisions made by the PLSG ultimately did inform the strategy of how the Group Litigation took place. However, no one single person was the decision maker, these decisions were made collectively as the PLSG. I explain my role within the PLSG further at paragraphs 131 and 132 below. In addition to the PLSG, the Postmaster Litigation Sub-Committee ("**PLSC**") was later established on 29 January 2018 to provide a forum for members of the Board, including the Shareholder Representative to oversee the Group Litigation, in a greater capacity than what the Board agenda allowed. I attended the PLSC on 26 March 2018 [POL00006764] where *"it was explained that day-to-day decisions on the litigation were taken by the executive [Group Executive], but the Board was consulted in advance of any significant decisions being taken."*

131. I have been asked how POL and/or I satisfied itself/myself that the substantive positions taken in letters and court documents (including the Generic Defence and Counterclaim) were accurate, including in respect of remote access.

While I arranged PLSG meetings, reviewed materials and facilitated access to POL subject matter experts and POL's suppliers such as Fujitsu – I will not have seen all letters and court documents prepared by POL and was not the signatory on any. My understanding was that POL's external legal advisors, who were holding the pen on drafting the letters and court documents, were using all the available facts and resources available to them at that time in order to produce accurate representations of POL's position and knowledge. It was not my role and I did not have sufficient technical detail or understanding to be able to state that the substantive position was accurate.

132. I have also been asked to set out the nature and extent of my involvement in drafting POL's letter of response. I did not draft the response, and my recollection is that POL's external legal team held the pen, with WBD in collaboration with external Counsel providing the drafting and subject matter experts including Fujitsu and Deloitte reviewing (and signing off on) relevant sections. Having read Mr Williams's email of 8 July 2016 **[POL00024988]**, it is apparent that once WBD finished their first draft of the response, specific members of the PLSG were asked to review certain sections. Mr Williams further explains that he would circulate a table directing each member of the PLSG to the relevant part of the response which relates to 'their' section of 'the business' (e.g. POL). I have reviewed the table **[POL00025299]** which referenced the 14 sections and 7 schedules that needed to be reviewed and can see that I was asked to review parts of the letter of response relating to: (1) Section 3 Post Office's knowledge of the dispute; (2) Schedule 1: Documents to be disclosed; and (3) Schedule 3: History of Events. I have now seen the agenda for the PLSG meeting on 20 July 2016 **[POL00139292]**. I

recall providing comments around 19 July 2016, and do not believe they were substantive in nature [POL00424926]. From reviewing the emails provided to me by the Inquiry I can see that there was further discussion and a call on 27 July regarding the formulation of words to be used for Remote Access. I did not however join this call owing to be out of the country on annual leave from 23 – 30 July 2016. I note POL filed its Letter of Response on 28 July 2016.

133. I have been asked to set out my involvement in POL's position on remote access throughout the Group Litigation. My role was to enable Deloitte to complete their Project Bramble Report, which was then shared with POL's internal and external legal team. I have further explained my knowledge of remote access and my role regarding the Project Bramble Report at paragraphs 26 to 44 of this statement.

Preparation of the Defence

134. I have been asked to describe my involvement with the drafting of POL's Generic Defence and Counterclaim. With respect to the drafting of POL's Generic Defence, I note that on 12 July 2017, Mr Parsons circulated a summary of the "*fact heavy section of the defence*" with different subject matter experts from POL listed against each section [POL00117755]. My name is not allocated to any of the sections, and I do not recall being asked to review the Generic Defence ahead of it being filed.
135. Other than my periodic receipt of updates via the PLSG, my input into the Generic Defence was with regards to Deloitte's investigations into POL's operation of suspense accounts. I have explained my role in suspense accounts at paragraph 72. Around 13 July 2017 it became apparent that

Deloitte's report would not be ready in time for the Defence to be filed **[WBON0001163]**. As such I had proposed to WBD that we have three possible drafting scenarios for what the outcome of Deloitte's investigation would be. I can see that WBD and Anthony De Garr Robinson KC were concerned about getting the position wrong (owing the Deloitte's work being ongoing) and as such "*decided to go very light on the drafting of this section*" **[WBON0001171]**.

136. I have been asked by the Inquiry to comment on specific paragraphs of the Defence. To confirm (and as is consistent with the substance of earlier paragraphs) I do not recall nor have I seen any documents provided to me by the Inquiry that suggest I have commented on the following paragraphs of the Defence, therefore I am unable to explain the basis on which POL pleaded or denied certain elements of the Defence:

136.1 Paragraphs 43(1) to (3)

136.2 Paragraph 48(3)(b)

136.3 Paragraph 48(3)(c)

137. I have considered the contents of paragraph 57(4) of the Defence, and specifically, "*To have abused those rights so as to alter branch transaction data and conceal that this has happened would be an extraordinarily difficult thing to do, involving complex steps...which would require months of planning and an exceptional level of technical expertise. Post Office has never consented to the use of privileged user rights to alter branch data and, to the best of its information and belief, these rights have never been used for this*

purpose.” Upon reviewing the email chain of 20 November 2016 [POL00245359] between Mr Parsons, Mrs MacLeod, Mr Williams, and me, I can see I suggest qualifying the statement “*that transaction data can be deleted / changed by detailing that – although theoretically possible – because the logistical challenges that would need to be overcome are so huge, it really is not a credible line of enquiry.*” Although I was not actively part of the drafting team of the Defence, from now reading this email chain provided to me by the Inquiry, it is possible that this pleading stemmed from my view of November 2016, which was based upon Mr Swift KC’s findings (as referred at paragraph 39) and the conclusions within the various versions of the Project Bramble reports.

138. My understanding at the time regarding POL’s decision to bring counterclaims against Postmasters in the Group Litigation was informed by WBD’s Decision paper (number 4) [POL00024989] presented to the PLSG on 14 July 2016 [POL00024650]. I do not specifically recall the meeting or the discussion we had around counterclaims, but having reviewed the documents provided to me by the Inquiry, I understand that in order to further substantiate the line of argument in POL’s Defence and confirm its legal position, it was logical and consistent with POL’s Defence to pursue counterclaims. WBD explained that approximately £700,000 was owed to POL, and provided there were “*fair legal grounds*” to do so, POL could legally pursue and recover these debts if the counterclaims were successful. I do not recall the discussions we had on 14 July 2016 at the PLSG or to the extent which I contributed, but I believe we were in agreement with WBD’s recommendation.

Ongoing Management of the Litigation

139. As discussed above at paragraph 130, POL oversaw the conduct of the litigation through its governance structure which included: (1) the PLSG; (2) the PLSC; and (3) the Board. Notably, the governance structures were not purely made up of legal professionals within POL, instead the composition of the PLSG, particularly, were non-legal professionals from across the organisation.
140. The PLSC was chaired by Mr Parker, the then Chairman, and was attended by Board Members and the then Shareholder Representative, Tom Cooper. On occasion, I would attend PLSC meetings in addition to PLSG meetings. For example, I attended a PLSC meeting on 26 March 2018 [POL00006764]. I did not have a speaking role in the PLSC meetings, as noted by my name under the 'In Attendance' section of the minutes, nor was I a member of the PLSC (as I was not and am not a member of the Board). However, I did help to ensure that those meetings were timed correctly in alignment with the litigation timetable, and that the members of the PLSC had the correct supporting papers available to them to make the decisions being asked of them.

Disclosure

141. From memory, my role in disclosure was limited to facilitating access to people and systems so that WBD could disclose the documents POL was required for (what we believed to be at the time) an effective disclosure exercise. I believe I was the main point of contact for WBD into POL for disclosure in this regard. The approach taken would have been in a manner consistent with the

decisions taken at the PLSG subsequent to the WBD Decision Papers that had been drafted.

142. An example of how I assisted in respect of the disclosure, is with regards to relevant SharePoint sites. Owing to POL operating an outsourced service support model for its IT, extraction exercises involved multiple suppliers including, for example, ATOS and CompuCenter. Such extraction exercises also had to be considered by POL's IT Security and Data Protection Teams. As our solicitors on record for the GLO, WBD would also be involved and as POL didn't have the technical expertise to extract SharePoint sites in the forensic manner necessary, we had to engage a third party to do this on our behalf – this was Millnet (now Consilio). In addition to identifying the right individuals to be on the calls / attend the meetings, I would also then have to ensure the relevant Change Requests, approvals and suite of contractual documentation was complete and POL governance followed. This was a significant task; made more complicated by the deadlines we were working to.
143. Prior to this litigation, I had no prior experience of disclosure for litigation. I gained knowledge through the decision papers taken through PLSG and my conversations with the WBD team. I understood that the disclosure in the Group Litigation was managed on a trial-by-trial basis, and for each trial, disclosure was mainly given under 'Model C Disclosure'. For some of the categories, document disclosure was provided via 'Model D Disclosure' which I understood was more akin to standard disclosure obligations.
144. During the course of the Group Litigation, I also inherited the team of individuals who had aided with the production of the POIRs in the ICRAMS

and who, post ICRAMS and owing to their knowledge of what documents were held where, were re-purposed to service questions from the WBD and locate materials from across the organisation that should be reviewed by the WBD team for relevance. There was no natural home for these individuals within the organisation which is why I temporarily line managed them before they returned to Mrs Van Den Bogerd when her reporting line changed to Mrs MacLeod in, I think, mid-2018.

145. I have been asked to consider a letter from Freeths LLP to Andrew Parsons dated 13 September 2017 [POL00003414]. In this letter, Freeths LLP reiterates that the Known Error Log (“KEL”) had not yet been disclosed, and that the claimants were entitled to inspect the KEL. My recollection is that POL was willing to provide access to the database in its entirety and that an offer was made for the Claimants’ expert to be able to inspect the actual KEL database rather than be provided with a copy of it. This was on the basis that it would have been extremely difficult, if not impossible, to extract a complete copy of what was, as I understood, a living database that was regularly updated and – based upon what Fujitsu had told us – did not actually contain details of the types of BEDs the Claimants’ expert was interested in. Though I have not seen papers included within my bundle, I would expect papers on how to respond to these requests to have been taken through the PLSG via decision papers.

146. I have also been asked to set out my knowledge of the PinICL/PEAK database during the Group Litigation. I cannot recall any specific knowledge that I may have held at that time, but having read the documents provided to me by the

Inquiry, I believe we discussed disclosure of the PEAK system to the Claimants at the PLSG on 26 September 2018 [POL00023013]. However, I cannot recall the discussion regarding the PLSG's decision on disclosure of the PEAK system, nor have I been provided with a Decision Paper within my bundle to aid my memory. Nevertheless, I expect the PLSG would have acted in accordance with the legal advice provided which would have been based upon the information provided to POL and WBD by Fujitsu. At the time I genuinely did not believe POL was 'restricting disclosure'.

147. I have been asked to explain the basis on which POL pleaded Paragraph 50(4) of the Defence which relates to the KEL. I cannot recall being asked to review or feed in thoughts into this drafting. I believe it would have reflected the understanding at the time, based on what Fujitsu had told POL.

148. Subsequent to the decisions made by the PLSG, I would sometimes assist with ensuring the associated actions were discharged. [POL00254487] is an example of this. Freeths LLP had asked for 100 technical documents to be disclosed. I believe the PLSG had asked for these documents to be reviewed by Deloitte ahead of disclosure for any content that could contradict the conclusions within the Project Bramble report or content that could pose an IT security risk, and any content that could cause reputational damage. I would have agreed the commercial terms for the statement of work and provided Deloitte with access to the documentation in question. On this occasion, it looks from reading the materials that I authorised disclosure ahead of when I should have but immediately admitted my mistake, apologised, and set in train the necessary remedial action [POL00254556].

Preparation for the Common Issues Trial

149. Similar to as described within the paragraphs above, my role in preparing for the Common Issues Trial was primarily focussed around being a member of the PLSG and the collective decision making required to provide clear instructions to WBD, as I have explained above at paragraph 123.2 Outside of the PLSG, I sought to assist in facilitating access to the subject matter experts across POL, and I worked with our Finance Team **[POL00253439]** to obtain cost estimates, provide cost forecasts, and ensure an appropriate budget provision was in place for the litigation. I ended up taking on this role of working closely with our Finance Team because it aligned with my previous work during the ICRAMS and the broader functional management type activities I assisted Mrs MacLeod with. POL had and continues to have finite financial resources so a lot of effort must go into forecasts, re-forecasts, along with assumptions, risks and opportunities attached to those forecasts.
150. To confirm, I cannot recall preparing for the Common Issues Trial with regards to the assertion of privilege in redacting documents, the preparation of witness evidence, or how POL's case on the effect of the "settle centrally" button was prepared. In the documents provided to me by the Inquiry, I have not seen a Decision Paper or meeting minutes of the PLSG which record the decision-making process related to the technical arguments about "settling centrally", though I would expect such a paper to exist. My involvement with witness preparation was confined to pastoral care and logistics.
151. With regards to the cross-examination of the claimants, I understood that was within the remit of POL's external counsel. As I explain above at paragraph

121, my genuine understanding of the Common Issues Trial was that it was about the construction of the contract between POL and Postmasters. However, during the litigation the claimants introduced 'post signature' type evidence which POL sought to strike out. On 5 September 2018, the PLSG considered a Decision Paper titled "*Should Post Office apply to strike out inadmissible parts of the Claimants' evidence?*" [POL00023285] wherein WBD have explained that, after reviewing the claimants' witness statement evidence, evidence has been introduced which relates to events that took place after each claimant entered into their contracts with POL. WBD explained that the strike out application would not be for the statements as a whole, but approximately 30-50% of the Lead Claimants' statements. The PLSG agreed with WBD's recommendation and decided that POL should make the strike out application, which was heard on 10 October 2018 by Fraser J. A key reason for doing so was to mitigate the risk of the Judge becoming prejudiced with the evidence put forward by the claimants and which POL believed would be better heard at subsequent trials of breach, once the meaning of the contract had been determined.

152. Mr Parsons informed us on 15 October 2018 that POL's strike out application was not successful [POL00023209]. Ultimately, the view was that if the evidence was to remain in play during the Common Issues Trial, POL should be able to use it to put their case forward, just as the claimants had used the evidence to make allegations about POL's behaviour. The mechanics of how that was done in the form of cross examination was in the hands of David Cavendar KC and WBD, as POL's external legal counsel. I do think I recall a paper being circulated to the PLSG regarding the strategy for cross

examination, however I have not been provided with a copy of it by the Inquiry, nor have I been able to locate it.

153. On occasion I would be asked by key members of POL for updates on the Common Issues Trial. For example, Mrs Vennells asked me directly on 5 November 2018 for the major activities of the GLO during that week **[POL00158363]**. I was asked these types of questions frequently because I attended each day of the trial and, on this occasion, because I believe Mrs MacLeod had to unexpectedly return to Australia for a short period of time.

Horizon Issues Trial

154. I have been asked to summarise the nature and extent of my involvement in preparing for the Horizon Issues Trial. My role in the Horizon Issues Trial was similar to that in the Common Issues Trial, as I explain above at paragraph 149. I was not involved in the decisions to assert privilege in redacting documents, nor was I involved in the preparation of Mr Parker or Mr Godseth's witness evidence. I may well have retained a pastoral witness preparation role, in organising logistics or accommodation, but due to the passage of time, I am unable to confirm any details of that.
155. In September 2018, the PLSG was presented with a WBD Decision Paper **[POL00257368]** regarding the sequencing of evidence during the Horizon Issues Trial. As I explain above at paragraph 121, my understanding was the Horizon Issues Trial would be considerably more technical and involve expert opinion evidence. By virtue of this, POL would need to heavily rely on its expert witness. Furthermore, there would be a required reliance on the information and analysis provided to us by Fujitsu. WBD expressed that there was an

inherent risk in relying on a third party's evidence, because the accuracy of Fujitsu's data could not be fully tested. To confirm, the PLSG was not asked to make a decision on the sequencing of evidence, instead the WBD Decision Paper **[POL00257368]** was a record of the proposed approach and instructions POL (via Mr Williams) had given to Mr Parsons (WBD).

156. The PLSG, and specifically me, had limited, if any, involvement in liaising with Fujitsu and Gareth Jenkins for assistance with preparing the case for the Horizon Issues Trial. My recollection (and I have not been provided documents that prove contrary to this recollection) is that I have never met, spoken or exchanged emails with Mr Jenkins directly and it was WBD (and Deloitte for the purposes of Project Bramble) who liaised with Fujitsu and perhaps Mr Jenkins directly.
157. As mentioned above in paragraph 13, part of my then role included working closely with Mrs Van Den Bogerd and Deloitte on the Horizon Issues Contingency Planning. This was during the approximate 12-month period of significant change I reference at paragraph 13 within the background section. This work involved preparing the business for an effective immediate and short-term operational response, if the judgment from the Horizon Issues Trial ended up being averse to POL. My specific role in this team was: to aid Mrs Van Den Bogerd with the preparation of materials ahead of workshops with the business, aid in briefings to GE which took place on a weekly basis in the immediate run up to the Horizon Issues Trial and prepare walk throughs / run throughs with the Rapid Response Team that was assembled **[POL00155129]**.

GENERAL

158. I have been asked whether there are any other matters I consider relevant to the Inquiry and that I would like to draw to the attention of the Chair. I would like to draw the Inquiry's attention to a line of questioning that featured in oral evidence with Mr Read, Mr Foat, and Mr Recaldin. All three witnesses were presented with an email chain from January 2020 [POL00155397], within which Mr Foat seeks views on a paper containing legal advice from HSF about the design of the Historical Shortfall Scheme ("HSS"). I have been told by POL this paper is privileged and that this privilege has not been waived by POL. Nevertheless, the assumption that the comments in my email of 10 January 2020 sought to prevent people from being able to enter the HSS is incorrect. I can see how this view could be formed when reading the email chain in isolation and without the benefit of being sighted on the underlying paper. This is unfortunate but, again, incorrect.

159. The comment in question as included within my email of 10 January 2020 was as follows:

"My strong view is that you cannot seek payment from applicants – however small and regardless of the rationale behind it. Optically this would be extremely challenging and would be a position that I believe the business would struggle to maintain under political and media pressure. I think you can achieve the same desired outcome though having a very tight and clearly communicated set of eligibility criteria and requirements in terms of the documentation applicants have to provide in order to be accepted into the Scheme"

160. My comment was made in the context of claimants having already been accepted into the HSS and being asked to pay a mediation fee, if the claim was not resolved at a preceding stage. The “*desired outcome*” referred to is not in relation to preventing entry but rather, in assisting to manage claimants’ expectations and preventing unreasonable claims being made. The paper, which is privileged, makes this clear.
161. My legal representatives received a letter on 16 October 2024 from Burgess Salmon Fieldfisher, on behalf of POL. This letter states, “*the inference drawn by Mr Henry from Mr Underwood’s email was incorrect; entry fees were not mooted before access to the HSS Scheme would be allowed in the paper to go the GE*”.
162. The BSFF letter continues, recording the Group Executive were being made aware that an applicant could be “*...asked to pay a mediation fee if the claim had not been resolved at the preceding Assessment, Good Faith Meeting or Escalation Meeting in order to discourage unreasonable claims (such as claims for amounts which bear no reasonable relation to the actual amount which could be claimed on customary principles of causation and loss) but no such fee was included in the structure of the scheme*”.
163. I think it is also relevant to highlight the paper was clear in that any criteria included within it was indicative and for the Group Executive to consider (and ultimately determine – not HSF, Mr Foat, Mr Williams or I) and that this criteria could not be finalised until the extent of the claims were known as upon receipt they may need to be recast. Further, the paper, email chain and my comment were all prior to the Hamilton Judgment. Though Lord Justice Holroyde, Mr

Justice Picken and Mrs Justice Farbey DBE's findings relate to criminal law, they likely inform what should be (and likely now are) considered as being reasonable claims within the HSS (which I understand considers only civil claims).

164. Finally, towards the end of 2021 and in January 2022, KPMG were asked to assist POL, by way leading a number of workshops, regarding the design and "critical success factors" of POL's remediation schemes. Though I believe the primary focus to have been the schemes set up / being set up to consider claims involving criminal convictions, thought was also being given by Mr Recaldin as to whether to undertake a similar exercise for the HSS. My view of what the various schemes (including the HSS) should seek to achieve is set out clearly within the emails I sent to KPMG on 11 August 2021 [POL00460651] and which I forwarded to Mr Recaldin on 6 January 2022 [POL00460652] ahead of an upcoming workshop taking place. Within this email I state:

"...my view is that whatever remediation / compensation Scheme is set up, it needs to:

- *Be capable to bringing closure to this matter for interested parties.*
- *To be funded appropriately to enable those affected to be properly compensated*
- *For it to be independent of Post Office, to avoid conflicts*
- *To be properly but not overly governed, so that affected individuals receive compensation swiftly*

- *Not distract and therefore prevent POL from being able to deliver on its forward facing strategy*
- *Represent good value for money for the public purse – the administration of the scheme and how much that costs must be proportionate but not to the detriment of those affected – i.e money going to law firms rather than affected individuals*
- *Be properly documented - processes, controls, delegated authorities, ToR.*
- *The ‘client’ and decision makers must be identified and trusted”.*

165. I have also been asked to reflect upon my time at POL and whether there is anything, with the benefit of hindsight, I would have handled differently. Throughout my time at POL, I have acted in good faith based upon the knowledge I had and the information available to me but there are of course things I wish I knew earlier and could, as a result, have acted on. At the time however, I was not, for example, aware of the existence or extent of the issues referred to within the Hamilton Judgment.

166. At its heart, the cause for this Inquiry is POL prosecuting people but not discharging its duties whilst doing so. As a result, those who were prosecuted by POL and others were prevented from something everyone should be able to take for granted - a fair trial.

167. Given the nature of POL’s failings in this regard (not investigating all reasonable lines of enquiry nor making disclosure to the defense of anything which might reasonably be considered to undermine its case), it is not only

those individuals who were prosecuted that have been treated unfairly; the application of these failings and the consequence of them is much broader.

168. Reflecting upon this now and particularly in the context of when bringing private prosecutions (but also more generally), it seems to me that POL could and should have taken a step back and not ignored what was understood to be the legal position but first, satisfied itself that Postmasters were set up for success (from the point of which their relationship with POL began, until it ended and everything in-between) and with this in mind, also challenged itself with regards to what the fair-minded course of action to take was.
169. If it had asked itself these questions and concluded that it could not satisfy itself in either of these two respects, then that should have been reflected in how it responded when, for example, shortfalls were identified and potential courses of action considered.
170. Of course, I have not and do not attend every meeting that was / is held at POL, nor do I routinely interact with its operational teams so it may be that these questions had been considered. Nevertheless and to the extent these questions are not already being considered and reconsidered by POL, I think they should be, to ensure this can never happen again and that the relationship between Postmasters and POL is truly reset – to the benefit of Postmasters and the millions of customers they serve; a great number of whom are vulnerable.

STATEMENT OF TRUTH

I believe the contents of this statement to be true.

Signed: **GRO**

Dated: 12-Nov-2024

Index to First Witness Statement of Mark Underwood

No.	URN	Control Number	Document Description	Date
1.	POL00022635	POL-0019114	A review on Behalf of the Chairman of Post Office Limited Concerning the Steps Taken in Response to Various Complaints and by Sub-Postmasters	08/02/2016
2.	POL00279995	POL-BSFF-0118058	Email from Mark Underwood to Ben Foat, Tim White CC'd Katy Thorpe and others RE;Handover Note	27/07/2019
3.	FUJ00081950	POINQ0088121F	Email from Mark Underwood to Kevin Lenihan and others re: Second Sight assertions about editing data	07/04/2015
4.	FUJ00237386	POINQ0243491F	Email from Pete Newsome to Steve Bansal RE: FW: Bugs	11/06/2015
5.	POL00323499	POL-BSFF-0161549	Email from pete.newsome to Mark	21/12/2015

			Underwood CC ing Patrick Bourke. RE: presentation - Strictly Private & Confidential - Subject to Legal Privilege	
6.	POL00317146	POL-BSFF-0155196	Email from Melanie Corfield to Mark Underwood RE: Updated Information	16/06/2015
7.	POL00316930	POL-BSFF-0154980	Email from Mark Underwood to Andrew Parsons, cc Patrick Bourke and Melanie Corfield re bugs according to the Interim Report	11/06/2015
8.	POL00307820	POL-BSFF-0145870	Horizon Spot Review 5 - Response	31/10/2014
9.	POL00211695	POL-BSFF-0049758	Email from Mark Underwood to Andrew Parsons cc'd Belinda Crowe, Patrick Bourke and others re: M031 - POL Response to CRR [BD- 4A.FID25887227]	31/10/2014
10.	POL00149488	POL-BSFF-0008608	Email chain from Patrick Bourke to Mark Underwood re: Horizon questions	11/11/2014

11.	POL00149598	POL00149598	Email chain including Mark Underwood (POL); Patrick Bourke (POL); Tom Wechsler (POL) & others Re: Remote Access Question Raised	20/11/2014
12.	POL00318209	POL-BSFF-0156259	Email from Andrew Parson to Rodric Williams, Mark Underwood, Gavin Matthews RE: Horizon - balancing transactions	08/07/2015
13.	FUJ00087133	POINQ0093304F	Email from Mark Underwood) (POL) To: Davidson James (Fujitsu), Cc: Patrick Bourke (POL), Parsons, Andrew (bonddickinson), Sub: Remote Access Papers: for review	25/11/2014
14.	WBON0000326	WBD_000196.000001	Email from Mark Underwood to Andrew Parsons, Cc'd Patrick Bourke Re: Remote Access paper - V2 returned by FJ	10/12/2014

15.	WBON0000327	WBD_000197.000001	Initial Complaint Review and Mediation Scheme - Horizon Data	08/06/2012
16.	FUJ00236842	POINQ0242947F	Email from Davidson James to Newsome Pete, Harvey Michael. CC: Godeseth Torstein. RE: FW: Remote access paper	19/12/2014
17.	FUJ00237155	POINQ0243260F	Email from Pete Newsome to Michael Harvey, Steve Parker, Godeseth Torstein and others re: FW: Remote access paper.	08/04/2015
18.	POL00028062	POL-0023065	Report: Horizon Desktop Review of Assurance Sources and Key Control Features – draft for discussion, Deloitte	23/05/2014
19.	POL00233987	POL-BSFF-0072050	Email from Rodric Williams to Mark Underwood 'RE: Project Zebra – Draft Report' and 'hold harmless' letter	13/10/2015

20.	FUJ00087142	POINQ0093313F	Email from James Davidson to Mark Underwood CC: Kevin Lenihan, Newsome Pete RE: URGENT ACTION: Accessing Horizon	30/01/2015
21.	WBON0001030	WBD_000900.000001	Email from Andrew Parsons to Jane MacLeod, Rodric Williams, Patrick Bourke & Ors RE: Deloitte Preliminary Report	13/07/2016
22.	POL00025209	POL-0021688	Email from Mark Underwood to Andrew Parsons, Thomas P Moran cc: Mark R Davies, Jane MacLeod, Tom Wechsler and others re: RE: Remote Access wording - subject to litigation privilege [BD-4A.FID26859284]	21/07/2016
23.	POL00028928	POL-0025410	Deloitte "Bramble" - Draft Report	16/01/2018

24.	POL00104218	POL-0103801	Email chain from Jane MacLeod to Jonathan Swift re: FW; Draft terms of reference	10/10/2015
25.	POL00130960	POL-0120804	Mediation Scheme Chronology – Confidential and Subject to Legal Privilege	13/10/2015
26.	POL00162686	POL-0151078	Email from Mark Underwood to Jane MacLeod, cc Patrick Bourke and Rodric Williams, RE: Draft note to accompany the updated and attached chronology for Jonathan Swift QC	13/10/2015
27.	POL00041564	POL-0038046	Bankruptcy, prosecution and disrupted livelihoods - Postmasters tell their story; reported by Rebecca Thomson – Article	11/05/2009
28.	POL00040517	POL-0036999	Report on Further lines for Jo Swinson MP – Westminster Hall Debate	17/12/2014
29.	POL00235243	POL-BSFF-0073306	Update on Project Sparrow Report	20/11/2015

30.	POL00216092	POL-BSFF-0054155	Email from Sean Farrow to Mark Underwood and Michael R Haworth Re: Counterfeit Notes	30/12/2014
31.	POL00221743	POL-BSFF-0059806	Email from Belinda Crowe to Chris Aujard, Andrew Parsons, Rodric Williams and others RE: Note of telecon with Ian Henderson 20Jan	11/02/2015
32.	POL00221759	POL-BSFF-0059822	Email from Mark Underwood to Dave M King cc Kevin Lenihan, Belinda Crowe and others Re: Second Sight data provision – Bracknell	11/02/2015
33.	POL00312099	POL-BSFF-0150149	Email from Mark Underwood to Andrew Parsons, Paul Loraine RE: FW POL Response	11/02/2015
34.	POL00152996	POL-BSFF-0012108	Note re: Bulletpoints for Project Sparrow including Panorama and Current Position	26/08/2015

35.	POL00153248	POL-BSFF-0012360	Review of the first ten Final Case Review Reports v1.0	14/09/2015
36.	POL00027363	POL-0024004	Strictly Confidential Post Office Ltd Board Initial Complaints Review and Mediation Scheme: Update Paper by Chris Aujard and Belinda Crowe.	17/09/2014
37.	POL00209725	POL-BSFF-0047788	Letter from Chris Aujard to Ron Warmington and Ian Henderson RE: Second Sight's Engagement	24/09/2014
38.	POL00209883	POL-BSFF-0047946	Annotated Agenda for Second Sight dated 30 September 2014	29/09/2014
39.	POL00156544	POL-0145696	Email from Mark Underwood to Patrick Bourke CC Belinda Crowe Re: A few cases to show SS lack of quality	21/11/2014
40.	POL00219827	POL-BSFF-0057890	Draft of the available options to handle the PO scandal.	22/01/2015

41.	POL00219104	POL-BSFF-0057167	Email chain from Tom Wechsler to Mark Underwood, Patrick Bourke, Belinda Crowe & others RE: Options	19/01/2015
42.	POL00149577	POL-BSFF-0008697	Post Office Options for the Scheme	20/11/2014
43.	POL00149576	POL-BSFF-0008696	Email chain from Mark Underwood to Belinda Crowe, cc'ing Tom Wechsler and Patrick Bourke re: Commercial in confidence - ExCo presentation.	20/11/2014
44.	POL00352082	POL-BSFF-0177803	Email from Mark Underwood to Tom Wechsler, Belinda Crowe and Melanie Corfield re Project Sparrow Sub ctte grid v1.docx	17/02/2015
45.	POL00025376	POL-0021855	Bond Dickinson PO Group Litigation Steering Group Meeting RE: DECISION: Does Post Office agree with the recommended strategy set	14/02/2017

			out in this paper?	
46.	POL00006497	POL-0017802	Bond Dickinson decision paper - Case Management Strategy	11/09/2017
47.	POL00006462	POL-0017767	Steering Group Briefing Paper: Update on case management strategy	15/12/2014
48.	POL00006634	POL-0017892	Steering Group Noting Paper: Update on Litigation Strategy	27/01/2015
49.	POL00006481	POL-0017786	Steering Group Decision Paper - Update on Litigation Strategy	17/01/2018
50.	POL00006453	POL-0017758	Steering Group Noting Paper: Update on Litigation Strategy	02/02/2018
51.	POL00216579	POL-BSFF-0054642	Working doc on Post Office Ltd Board Sub Committee Initial Complaint Review and Mediation Scheme	04/01/2015
52.	POL00224571	POL-BSFF-0062634	Email from Mark Underwood to Andrew Parsons, cc'ing Patrick Bourke, Tom Wechsler and	17/03/2015

			another re: Response to Part Two - Second Sight's Part Two report	
53.	POL00313587	POL-BSFF-0151637	Email from Mark Underwood to Belinda Crowe RE: P2 update	20/03/2015
54.	POL00040954	POL-0037436	Email sent from Mark Underwood to Andrew Parsons and others re : Response to part two of second sights report with track	17/03/2015
55.	POL00040962	POL-0037444	Email sent from Mark underwood to Patrick Bourke and others re : Update to the response to part 2 of second sights report	20/03/2015
56.	POL00408646	POL-BSFF-0233111	Meeting with Baroness (Lucy) Neville Rolfe, Parliamentary Under Secretary of State	19/07/2016
57.	POL00150296	POL-BSFF-0009414	Email chain including Mark Underwood (POL); Patrick Bourke (POL); Richard Callard (BIS) & Others Re: Project	16/12/2014

			Sparrow Actions	
58.	POL00356012	POL-BSFF-0181733	Email from Melanie Corfield to Rodric Williams, Mark Underwood) and Patrick Bourke re: BNR - SS - concerning the amount of money spent on Second Sight	14/10/2015
59.	POL00423922	POL-BSFF- 0238737	Post Office Limited Audit, Risk & Compliance Committee Report: The Current Operation of Suspense Accounts	08/01/2024
60.	POL00241514	POL-BSFF-0079577	email from Mark Underwood to Patrick Bourke and Rodric Williams Re: Tm Update	13/05/2016
61.	WBON000108 0	WBD_000950.000 001	Suspense accounts briefing note - Meeting with Alisdair Cameron	17/05/2017
62.	POL00408769	POL-BSFF- 0233234	Call with Alisdair Cameron - Briefing Note	06/07/2017
63.	POL00024771	POL-0021250	Email from Mark Underwood to Andrew Parsons and Jane MacLeod	14/07/2017

			RE: Draft Defence - Suspense Account	
64.	WBON0001163	WBD_001033.000001	Email from Mark Underwood to Andrew Parsons RE: Private & Confidential - Subject to Legal Privilege	13/07/2017
65.	POL00460649	POL-BSFF-WITN-068-0000007	Email from Mark Westbrook to Mark Underwood RE: FW: Private & Confidential: Subject to Legal Privilege - Suspense Accounts Report	26/03/2020
66.	POL00030907	POL-0027389	POL Audit, Risk & Compliance Committee Report into The Historical Operation of Suspense Accounts, Mark Underwood, 24 November 2020	24/11/2020
67.	POL00460657	POL-BSFF-WITN-064-0000270	Email from Mark Underwood to Kathryn Sherratt with others cc'd in RE KPMG's Investigation in to how POL Operates its Suspense Accounts.	08/01/2024

68.	POL00460656	POL-BSFF-WITN-064-0000273	Email from Mark Underwood to Declan Salter RE: Confidential - Contains Legal Advice: Draft response to the questions posed by the Inquiry on "Branch Suspense Accounts and Trading Statements"	04/12/2020
69.	POL00040516	POL-0036998	Email from Jarnail Singh to Patrick Bourke cc Belinda Crowe, Mark Davies and others re: Legally Privileged and Confidential - further lines for WHD	17/12/2014
70.	POL00226185	POL-BSFF-0064248	Email trail from Andrew Parsons to Andrew Parsons and others re: FW: Future Arrangements and Part II	09/04/2015
71.	POL00162583	POL-0150986	Note for Tim Parker - MU and MC amended	06/08/2015
72.	POL00139184	POL-BSFF-0001396	email from Mark Underwood to Angela Van-Den-Bogerd, Lorraine Lynch,	23/08/2015

			Alexandra Ward and others re Transcript of Panorama	
73.	POL00318987	POL-BSFF-0157037	Email from Mark Underwood to Mark R Davies cc Melanie Corfield RE: POIRs - responses to Panorama and Second Sight Report findings	06/08/2015
74.	WITN10010104	WITN10010104	Letter from Baroness Neville-Rolfe DBE CMG to Tim Parker RE: confirming their conversation last month regarding the Post Office Horizon system	10/09/2015
75.	POL00233179	POL-BSFF-0071242	Email chain from Mark Underwood to Rodric Williams, Patrick Bourke RE: Draft Speaking Notes for JM /TP Meeting on 25.09.15	24/09/2015
76.	POL00153429	POL-BSFF-0012541	Email trail from Mark Underwood to Patrick Bourke re: What about this ?	30/10/2015
77.	POL00238693	POL-BSFF-0076756	POL's Comments on the Chairman's Report	21/01/2016

78.	POL00024741	POL-0021220	Email trail from Mark Underwood to Jane MacLeod cc: Patrick Bourke and Rodrick Williams re: FW: Private & Confidential - Subject to Legal Privilege. Findings in relation to Recommendation Number 7	21/06/2016
79.	POL00390517	POL-BSFF-0217404	Email from Mark Underwood to Tom Wechsler, Melanie Corfield, Rodric Williams & Ors RE: Group Action against Post Office Limited	13/04/2016
80.	POL00041593	POL-0038075	Email from Mark Underwood to Andrew Parsons and Rodric Williams re: URGENT - Omnibus Trial	14/12/2017
81.	POL00241025	POL-BSFF-0079088	Email from Rodric Williams to Andrew Parsons Re: Group Action - action list	20/04/2016
82.	POL00041136	POL-0037618	Email sent from Rodric Williams to Mark Underwood and others re :	21/04/2016

			Group Action - action List	
83.	POL00023013	POL-0019492	Email from Mark Underwood to Jane Macleod, Angela Van-Den Bogerd, Mark R. Davies and others, ccing Aimee Daughters Re; Postmaster Litigation Steering Group call Tomorrow@ 14:30.	25/09/2018
84.	POL00024988	POL-0021467	Email from Andrew Parsons to Rodric Williams, Thomas P Moran, Andela Van-Den-Bogerd and others RE: Postmaster Litigation Steering Group - Confidential and Subject to Legal Privilege	13/07/2016
85.	POL00024165	POL-0020644	Email chain between Mark Underwood, Andrew Parsons, Rodric Williams and others Re: Tomorrow's Hearing.	01/02/2018
86.	POL00253137	POL-BSFF-0091200	Postmaster Group Litigation-General	27/01/2018

			Counsel Briefing Note	
87.	POL00266141	POL-BSFF-0104204	Email from Mark Underwood) To: andrew.parsons, Rodric Williams, Angela Van-Den-Bogerd and others re Expert joint memo [WBDUK-AC.FID27032497]	25/02/2019
88.	POL00359886	POL-BSFF-0185607	Email from Mark Underwood) to Rodric Williams, Jane MacLeod and CC Ben Foat re: Recusal Application - Claimants' Statement of Costs	02/04/2019
89.	POL00006764	POL-0018022	Meeting Minutes of the Postmaster Litigation Subcommittee of POL	26/03/2018
90.	POL00025299	POL-0021778	Section/Schedule - attachment to draft letter of response	20/07/2016
91.	POL00139292	POL-BSFF-0001480	Postmaster Litigation - Bates & 90 Others v. Post Office Limited - Agenda for steering group meeting	19/07/2016

92.	POL00424926	POL-0202873	Email from Mark Underwood to Mark R Davies, Patrick Bourke, Thomas P Moran and others re: Draft Letter of Response	19/07/2016
93.	POL00117755	POL-0114692	Email from Patrick Bourke to Andrew Parsons RE: PLSG meeting on Wednesday 24 May 2017 @ 12 in Tonbridge	13/07/2017
94.	WBON0001171	WBD_001041.000001	Email from Andrew Parsons to Jane MacLeod, Mark Underwood and others re: Draft Defence – Suspense Account	14/07/2017
95.	POL00245359	POL-BSFF-0083422	Email from Mark Underwood to Andrew Parsons, Jane MacLeod and Rodric Williams re: Remote access wording	20/11/2016
96.	POL00024989	POL-0021468	Bond Dickinson's Report regarding the Postmaster Group Action	13/07/2016

97.	POL00024650	POL-0021129	Email from Mark Underwood, Jane MacLeod, Angela Van-Den-Bogerd, and others re: PLSG meeting on Wednesday 24 May 2017 @15:00pm in Tonbridge (1.11)	19/05/2017
98.	POL00003414	VIS00004428	Letter from James Hartley to Andrew Parsons RE: Bates & Others v Post Office Limited - Group Action, Claim Number: HQ16X01238 , Inspection of Known Error Logs	13/09/2017
99.	POL00023013	POL-0019492	Email from Mark Underwood to Jane Macleod, Angela Van-Den Bogerd, Mark R. Davies and others, ccing Aimee Daughters Re; Postmaster Litigation Steering Group call Tomorrow@ 14:30.	25/09/2018
100.	POL00254487	POL-BSFF-0092550	Email from Mark Underwood to Jane MacLeod, Thomas P Moran, and Rodric	11/04/2018

			Williams - Re: 100 Technical Horizon Documents	
101.	POL00254556	POL-BSFF-0092619	Email from Mark Underwood to Jane MacLeod, Thomas P Moran, Rodric Williams – Re: 100 Technical Horizon Documents	17/04/2018
102.	POL00253439	POL-BSFF-0091502	Email from Mark Underwood to Stuart Nesbit cc'd Angela Van-Den- Bogerd re: Group Litigation OSOP 'Exposure': Private & Confidential - Subject to Legal Privilege	16/02/2018
103.	POL00023285	POL-0019764	Womble Bond Dickinson Report on Decision: Should Post office apply to strike out inadmissible parts of the Claimants' evidence?	05/09/2018
104.	POL00023209	POL-0019688	Email from Mark Underwood to Rodric Williams, Andrew Parsons and Jane Macleod ccing Dave Pa naech, Victoria	15/10/2018

			Brooks and Amy Prime re: Strike out application	
105.	POL00158363	POL-0146593	Email chain from Mark Underwood to Paula Vermeils and Mark R Davies cc'd Avene Regan re: RE: GLO update	05/11/2018
106.	POL00257368	POL-BSFF-0095431	Post Office Group Litigation - Update: First Round of Evidence for the Horizon Trial	25/09/2018
107.	POL00155129	POL-BSFF-0014226	Horizon Issues Response Plan Powepoint— GE Walkthrough by Angela Van Den Bogerd and Mark Underwood	29/08/2019
108.	POL00155397	POL-BSFF-0014494	Email chain from Mark Underwood to others "re: GLO Post Settlement GE Paper"	10/01/2020
109.	POL00460651	POL-BSFF-WITN-068-0000009	Email chain between Mark Underwood and Julie Bruce RE: Remediation Programme	11/08/2021
110.	POL00460652	POL-BSFF-WITN-068-0000010	Email from Mark Underwood to Simon	06/01/2022

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