

Witness Name: Sophie Louise Underwood
Statement No.: WITN09820100
Dated: 12 November 2024

POST OFFICE HORIZON IT INQUIRY

FIRST WITNESS STATEMENT OF SOPHIE LOUISE UNDERWOOD

I, Sophie Louise Underwood, will say as follows:

Introduction

1. I am a former employee of Post Office Ltd (“**POL**”) and held the position of Public Affairs Manager between 2 April 2013 and 22 July 2014. During my employment at POL, I was known by my maiden name, Sophie Bialaszewski.
2. This witness statement has been prepared in response to a request made by the Post Office Horizon IT Inquiry (the “**Inquiry**”) pursuant to Rule 9 of the Inquiry Rules, dated 10 October 2024 (the “**Request**”). The facts in this witness statement are true, complete and accurate to the best of my knowledge and belief.
3. I left POL over ten years ago and worked there for just over a year. Because of the time that has elapsed, I do not recall the details of all of the meetings I attended, documents I worked on, or emails I sent during my time at POL. That said, I have studied the documents provided to me by the Inquiry. The Request identified 29 questions to be addressed and I have done so to the best of my ability in this statement.

4. I have been assisted in preparing this witness statement by my legal representatives, Farrer & Co LLP.

Background

5. I have been asked to set out a summary of my career and qualifications prior to joining POL. I have had a varied career working in a number of different sectors, mainly with a focus on digital skills and business transformation.
6. I studied Economics and Political Development with European Study at the University of Exeter and graduated in 2004. After graduation, I spent a short time working at Shaw Trust charity before joining e-skills UK (which later became The Tech Partnership) and the following year began studying a Master's in Public Policy at University College London, which I did alongside my work. e-skills UK was a project-based organisation focused on helping the UK maximise the value of digital. I held a number of positions at that organisation between 2004 and 2009. When I left, I had the role of Team Manager (co-ordinator) of the Schools Team, which managed a number of programmes and looked at ways of encouraging more young people into STEM (science, technology, engineering and maths) subjects and careers.
7. I left e-skills UK in 2009 and spent a year at the charity FILMCLUB, working on strategy, partnerships and fundraising. In 2010, I joined IBM as a contractor, working as a Corporate Social Responsibility Manager for a year. In 2011, I took on a consultant role at a small cybersecurity firm where my role was to help organisations with their cyber security culture, training and communications programmes. In April 2013, I joined POL as a Public Affairs Manager.
8. I have been asked to briefly summarise the roles I held at POL. As set out at paragraph 1, I was employed by POL for just over one year, between 2 April 2013 and 22 July 2014.

My only role during this time was that of Public Affairs Manager within the Communications Directorate. This was the first time I had worked within a Communications Directorate and as such was keen to learn as much as I could. I reported into Jane Hill, Head of Public Affairs, who in turn reported into Mark Davies, Communications Director.

9. Communications, albeit a critical function, acts in service to an organisation. It is not a decision-making function, nor does it have the power or responsibility to make strategic decisions as to actions of the business. I was not accountable for strategic initiatives at POL, including those related to Horizon. My role involved providing opinion, advice and support in relation to communications.
10. I worked on a variety of different things whilst at POL. POL was a newly independent business when I joined, having separated from Royal Mail in 2012. I spent a lot of my time on the development of and embedding of POLs "Post Office 2020" strategy, working with external management consultants and colleagues across the organisation. I was the communication representative for the "Post Office 2020" strategy work, and this took up most of my time during my tenure.
11. As detailed later in this statement, I became involved in Horizon-related work when I was asked to join regular Horizon calls as a communications representative in July 2013. Shortly thereafter, I was asked to get involved in the Initial Complaints Review and Mediation Scheme (the **Mediation Scheme**), also as a communications representative. The Mediation Scheme had been established in August 2013 in response to Second Sight's "*Interim Report into alleged problems with the Horizon system*" (the **Interim Report**) (POL00029650).
12. I have been asked to summarise other professional roles I have held since being engaged by POL. When I left POL in July 2014 I joined a UK financial services organisation, where I continue to be employed on a part time basis. I have held a number of business

transformation roles in that organisation since and my current title is Head of Experience and Adoption.

Knowledge of relevant issues

13. I have been asked to set out my knowledge and understanding of the Horizon IT system, including the existence of bugs, errors and defects (**BEDs**) within Legacy Horizon and Horizon Online; remote access and that Fujitsu may be able, under certain circumstances to delete and replace Horizon audit files containing transaction data; when I joined POL. I did not have knowledge of the existence of the Horizon system itself when I joined POL so it therefore follows that I did not have any knowledge of these issues when I joined POL. I was not familiar with the term “BEDs”.

14. I have been asked to set out my knowledge and understanding of complaints made by subpostmasters (**SPMs**) as to the integrity of the Horizon IT system when I joined POL, and my knowledge and understanding that POL and previously Royal Mail Group, or companies within it, had investigated, prosecuted and obtained convictions of SPMs for theft, fraud and false accounting. I did not have any knowledge of these matters when I joined POL.

15. I have been asked to set out when my knowledge of the issues at paragraphs 13 and 14 materially changed. Some time in July 2013, the Communications Director asked me if I would join a regular meeting with other business departments as a communications representative. I cannot recall the name of the meeting but can see from the documents that it was called “*Regular Call re Horizon Issues*” (for example, Regular call re Horizon Issues – Meeting minutes from 19/07/2013 (**POL00141561**)). Around the same time, a number of colleagues across PR, policy and public affairs (including myself) got involved with managing Horizon-related work. It was around this time that I became aware of the existence of the Horizon system itself and the fact that

there were issues relating to it. I discuss the regular Horizon meeting in more detail at paragraphs 36 to 40 below.

16. I have been asked to set out when I first became aware of the existence, content or gist of a number of documents which have been provided to me by the Inquiry, and to set out what my thoughts were on these documents and any discussions I had with others at POL regarding them. Those documents are (as described in the Request):

- (i) Simon Clarke's advice of 15 July 2013 (**POL00006357**);
- (ii) Simon Clarke's advice of 2 August 2013 (**POL00129453**); and
- (iii) Deloitte's Project Zebra reports (**POL00028069**).

17. I do not recall being aware of, or seeing the documents at (i) and (ii) above during my time at POL. I can see from the documents provided to me that Simon Clarke was a Barrister for Cartwright King Solicitors. I was aware that POL's Legal team worked with Cartwright King Solicitors but do not think that I would have been privy to legal advice of that nature in my role as Public Affairs Manager. Regarding the documents at (iii), I can see that in Email from Sophie Bialaszewski to David Oliver, Rodric Williams, Belinda Crowe and others re: RE: Draft paper for the Board (**POL00304030**) that I was aware in April 2014 that Deloitte was carrying out an assurance exercise and that it would be producing a report as a result, but I do not recall seeing the report, nor does it appear that I was aware of any further reports. I do not recall hearing the term "Project Zebra" during my time at POL. I discuss this further at paragraphs 68 and 69 of this statement.

POL and my role

18. I have been asked to summarise my role and responsibilities in respect of public relations. As set out earlier in this statement, my role was Public Affairs Manager. Public

relations work was the remit of another team within the Communications Directorate whom I would have collaborated, coordinated and shared documents with.

19. I have been asked to describe my role and responsibilities at POL regarding the Horizon IT System and the response to complaints made about it. Alongside my work on the "Post Office Strategy 2020" and other things, as set out in paragraph 11, over the summer of 2013 I became involved in some Horizon-related work, having been asked to do so by the Communications Director. This started with me joining the regular Horizon calls (as detailed in paragraphs 36 to 40 below) in July 2013. Thereafter I worked on the Mediation Scheme from a communications perspective.

20. In terms of my role and responsibilities, I joined the Horizon regular calls and was a member of the Mediation Scheme's Programme Board as a communications representative. I was also involved in preparing communications documents such as communications plans, briefing documents, communications papers, handling plans and Q&As for the Mediation Scheme.

21. I have been asked to describe what my views were on the working culture within POL and the management style at the time, and whether my views have changed. During my short time at POL, I found my colleagues to be professional, helpful and supportive. Those views have not changed.

22. I have been asked to describe my working relationship with others who were involved in POL's response to complaints about the Horizon IT system, including Paula Vennells, Mark Davies, Jane Hill, Rodric Williams, Jarnail Singh, Angela Van Den Bogerd and Belinda Crowe.

23. Paula Vennells was the CEO of POL during my tenure. I did not have regular face-to-face contact with Paula, however I may have answered emails from her from time to

time, or may have been asked by more senior colleagues to send her information. For example, in an email from me to Paula dated 27 January 2014 (Email from Sophie Bialaszewski to Paula Vennells cc: Chris Aujard re: Second Sight (**POL00100123**)), I appear to be responding to a request for information about the original Second Sight cases. I do not recall this email, or the context in which I sent it, but assume that I sent it following an instruction, as I open the email with "*Following on from your discussion with Belinda please find below the information we have about the original Second Sight cases*".

24. As set out in paragraph 8, Mark Davies was the Director of Communications, and therefore had overall responsibility for the Communications function, of which public affairs was a distinct part. I had a great deal of respect for Mark. He was a visible leader and made an effort to get to know and support those in his direct reporting line and the wider team.

25. Jane Hill was the Head of Public Affairs, and as set out in paragraph 8, I reported into her. Jane joined POL shortly after I did. I had a good working relationship with Jane and enjoyed working with and learning from her during my time at POL.

26. Rodric Williams and Jarnail Singh were both in-house lawyers in POL's Legal team. I did not have a close working relationship with either of them, but we did interact, including on the regular Horizon calls in July and August 2013. Part of my role often involved collating information from around the business to assist with the preparation of communications documents. The Legal team, including Rodric and Jarnail, assisted us with information gathering, assisting with fact-checking and answering queries we had, and also advising on what information could be shared externally. I was wholly reliant on them in that respect.

27. Angela Van Den Bogerd led the Business Improvement Programme which was part of POL's response to the Interim Report (the other being the Mediation Scheme). I had

contact with Angela from time to time in the course of my work, but would not say that we had a regular working relationship.

28. I had regular contact with Belinda Crowe during my time at POL and we had a good working relationship. Belinda was a Programme Director who was in charge of running the Mediation Scheme.

29. I have been asked to describe my impression of my colleagues' views on the merits of the complaints made by SPMs about the Horizon IT system. I do not recall any discussion with or between colleagues on the merits of the complaints made by SPMs about the Horizon IT system, nor would I have expected that to be discussed within my remit. I do recall, however, having a sense that POL and other stakeholders were trying to resolve the concerns raised by SPMs via the Mediation Scheme and that POL was taking the complaints raised very seriously.

Communications regarding Horizon and the related issues

30. I have been asked to describe the nature and extent of my work in (a) handling external communications including with MPs and/or journalists and/or broadcasters and (b) internal communications in so far as relevant to the complaints relating to the Horizon IT system. No part of my work at POL involved dealing with journalists or broadcasters, which was the remit of the Public Relations team. Part of my role in supporting the Mediation Scheme involved preparing communications (with input from colleagues in other business functions) to MPs, for example, notifying an MP that a constituent SPM had applied to the scheme.

31. I would have drafted or contributed to working internal communications about the Mediation Scheme, such as briefing notes or Q&A documents, but this was a collaborative process with colleagues from across the business. Communications

containing legal and technical content, for example, need to be prepared in collaboration with, and signed off by subject matter experts.

32. In particular, I have been asked to explain (i) what POL's communication strategy was and who was involved in setting that strategy; (ii) to what extent, if at all, did the potential for future litigation or criminal appeals affect POL's communication strategy; and (iii) if on reflection, do I think that strategy was appropriate.

33. I do not recall what POL's overall communication strategy was at the time, nor was I responsible for setting it. I assume that would have been the remit of the Director of Communications, with input from all business functions of POL. I have no knowledge of the extent to which the potential for future litigation or criminal appeals affected POL's communication strategy and it therefore follows that I have no opinion as to whether that strategy was appropriate.

34. I have been asked to describe POL's communications strategy in respect of the Interim Report, including the use of the words "*no system wide (systemic) problems*"; and to what extent, if at all, did POL try to highlight or downplay that it was an interim report. POL issued a number of press releases about the Interim Report and the Mediation Scheme, which were prepared by the Public Relations team, alongside subject matter experts. I note that at the "Preliminary Conclusions" section of the Interim Report (**POL00029650**) states "We have so far found no evidence of system wide (systemic) problems with the Horizon software" and therefore it appears that in using those words, POL was quoting directly from the report. To the best of my recollection, the colleagues I had interactions with and the stakeholders that contributed to communications documents I worked on, thought that the Mediation Scheme, which had been established off the back of the Interim Report, was an appropriate way to address the complaints raised by SPMs.

35. I have been asked to describe the nature and extent of my involvement with POL's communication with government (including the Shareholder Executive) regarding Project Sparrow related matters. I do not recall corresponding with the Shareholder Executive directly about Project Sparrow related matters (which included the Mediation Scheme), but the Communications Directorate did have contact with Peter Batten from the Shareholder Executive which I would have been copied to. I can see in Email from Peter Batten to Belinda Crowe, Martin Edwards and others re: Horizon PQs (**UKGI00002126**) that I am copied to email correspondence with Peter Batten (from the Shareholder Executive) relating to Parliamentary Questions that had been received.

Horizon regular call

36. I have been asked to set out the nature and extent of my involvement with the Horizon regular call meetings, including the purpose of the meetings and my attendance at them. I do not have any recollection of these calls but have been assisted by documents from the Inquiry, in particular the following:

- Regular call re Horizon Issues – Meeting minutes from 19/07/2013 (**POL00141561**);
- Regular Call re Horizon Issues - Name, Area and Issues / Observations / Comments (24 July 2013) (**POL00137370**);
- POL Meeting Minutes from Regular Call Re: Horizon Issues on 7 August 2013 (**WBON0000802**);
- Meeting Minutes for Regular Call re Horizon Issues (14 August 2013) (**POL00083930**);
- Meeting Minutes for Regular Call re Horizon Issues (21 August 2013) (**POL00089720**); and

- Bond Dickinson Agenda for Regular Call re Horizon Issues, and action points from last meeting on 21 August 2013 (28 August 2013) (**POL00083935**).

37. I can see from these documents that these meetings were regular, and for the most part took place on a weekly basis during July and August 2013. They were attended by representatives from Legal, Financial Services Centre (FSC), Security, Network, Information Technology & Change, and Communications. I can see that I was in attendance as a communications representative at all of the meetings listed in paragraph 36 above, save for the meeting on 14 August 2013 which was attended by another member of the Communications team. A colleague from the Public Relations team was in attendance on 19 and 24 July 2013.

38. It is clear from the July notes that the purpose of the meeting was to "*identify any issues around the integrity of horizon from a technical perspective and take any necessary action*" (**POL00141561** and **POL00137370**), although on 21 August 2013 the purpose is set out as being "*to ensure visibility, support and communication across the business*" (**POL00089720**).

39. I can also see, based on the notes, that I rarely commented during the meetings. Based on the minimal actions I was assigned, I can only assume that I attended those meetings for awareness purposes and to ensure that the appropriate business functions were aware of various issues. For example, in the 21 August 2013 meeting my action was "*to copy Jarnail Singh and Rodric Williams into emails going forward regarding new MP cases, reporting and relaying information regarding queries from MP's to Rosie Gaisford of Bond Dickenson*".

40. I have been asked to set out my recollection of the initial meetings in July and August 2013, including what was discussed regarding note/minute taking and/or record keeping for those meetings. As set out above, I do not have a recollection of these

meetings but I have been assisted by the documents provided to me by the Inquiry. I do not have a recollection of what was discussed regarding note taking, minute taking or record keeping for those meetings. I can see, however that on 16 August 2013, Dave Posnett, Accredited Financial Investigator, sent an email to Andrew Parsons stating that the notes would be collated in an independent spreadsheet which would be circulated to attendees. I do not recall receiving this spreadsheet nor have I seen documents that suggest I did, although I would assume it was circulated to attendees in the ordinary course.

41. I have been asked to what extent, if at all, I was aware of any instructions to shred or destroy notes made as part of the Horizon regular call. I have no recollection of ever being instructed to shred or destroy notes made as part of the Horizon regular call, or at all, during my time working at POL. If I had ever been given this instruction, I would have remembered it as it would have been a very unusual request.

The Mediation Scheme and Project Sparrow

42. I understand that the Mediation Scheme was originally one of two strands of a large strategic programme known as Project Sparrow, which was set up in July 2013 by the Executive and Board in response to the Interim Report. I think it initially comprised two initiatives, the Mediation Scheme and the Business Improvements Programme. I understand that the two initiatives were separated later in 2013 so that they became two distinct projects.

43. I have been asked to describe my involvement in the establishment of the Mediation Scheme and the Working Group. I did not have any involvement in setting up or designing the Mediation Scheme, but played a role in considering and advising on POL's communications approach in relation to it during my tenure.

44. I have been asked to set out what the internal POL view was on the purpose of the Mediation Scheme, including whether there was any divergence of views on that issue. My understanding of the purpose of the Mediation Scheme (which I understood to be the internal POL view) was that it had been established to address individual complaints raised by SPMs about the Horizon system and resolve complaints where possible. I do not recall if there was any divergence of views on that issue and was not privy to any discussions indicating the same.
45. I have been asked to what extent, if at all, the Mediation Scheme was designed to identify whether there were problems with the Horizon IT system. As set out above, my understanding of the Mediation Scheme at the time was that it had been established to resolve complaints raised by SPMs. I was aware that there was a Business Improvements Programme running in parallel to the scheme, which had been set up to address any business improvement issues that were identified whilst complaints were being dealt with by the Mediation Scheme. In that sense, my view at that time was that POL was taking matters seriously and committed to making improvements.
46. I have been asked to describe what my views were at the time of the appropriateness of POL's approach to the establishment and running of the Mediation Scheme. Whilst it is difficult to recall what my personal views were at the time, I suspect I would have felt the same as my colleagues and stakeholders, in that the Mediation Scheme was an appropriate response to resolve individual complaints. As things progressed into early 2014, my view was that POL rightly took the appropriate action to involve more senior colleagues, external mediators and management consultants to deal with the Mediation Scheme and individual cases. It was not within my remit to decide what strategic action POL should take. My job was to help to ensure that it was communicating what it was doing clearly and concisely.

47. I have been asked to describe my role and responsibilities in relation to the running of the Mediation Scheme. I attended meetings and calls (sometimes alone, sometimes with other members of the Communications team). My work involved preparing communications documents with the input of key stakeholders across the business, for example the Mediation Scheme FAQ pack and template letters (examples of these are set out at Email from Sophie Bialaszewski to Alan Bates cc Ruth Barker, Angela Van Den Bogerd re Mediation Pack Letter and Information (**POL00146088**), Letter from Angela Van Den Bogerd to Alan Bates re Initial Complaint Review and Mediation Scheme (to be known as the Scheme) (**POL00146089**) and Letter from Angela Van-Den-Bogerd to Alan Bates to be distributed to SPMs re: Initial Complaint Review and Mediation Scheme (to be known as the Scheme) (**POL00146090**) and a communications plan. Key stakeholders were involved in inputting the appropriate information into those documents. I trusted that the information provided by stakeholders and subject matter experts was accurate and if I had sensed that it wasn't, I would have asked for more details and clarification. I do not recall ever getting a sense that information provided to me was inaccurate or untrue. If I had, I would have escalated it to my line manager (who was Head of Public Affairs) and then to the Director of Communications.

48. Specifically for the Mediation Scheme, my role involved a lot of coordinating and collating information in order to prepare communications documents. An example of this is evident in an email from me to Angela Van Den Bogerd (Email from Sophie Bialaszewski to Angela Van-Den-Bogerd RE: Feedback (**POL00200202**)) in which I ask her to review a document I had prepared.

49. I have been asked to explain POL's strategy in responding to applications and who was responsible for that strategy. I never worked on individual cases or the actual mediation of cases, and therefore, do not have any comment to make in that regard. I do not recall who was responsible for that strategy.

50. I have been asked to set out my involvement in creating the “Managing Expectations Gap” document, and any work I carried out in managing expectations. I do not recall preparing this document, nor is it written in my style. I have, however, been assisted by the documents provided to me by the Inquiry to an extent. I can see that I worked on a document called “Managing Expectations Gap” in November 2013 with Andy Parsons, Senior Associate at Bond Dickinson (Initial Complaint Review and Mediation Scheme - Managing Expectations (**POL00146799**)). I can only assume that my input into the document was from a communications perspective. It appears that this document was created to address what had been identified as a “*expectations gap*” amongst the different stakeholders involved in the Mediation Scheme (including Second Sight, the Justice for Subpostmasters Alliance and MPs) in terms of what they believed the Mediation Scheme would provide by way of resolution or settlement. On its face, it appears to be a “scenario planning” document, setting out different options, rather than a document defining a strategy. In an email to Mark Davies on 12 November 2013, I attached this document and set out my thoughts on what could be required by way of communications documents to address these differing expectations. Whilst I may have been involved in preparing the “Managing Expectations Gap” document, it appears on its face to be an Executive Committee (**ExCo**) document, and I would not have been the one to brief ExCo on it. I don’t recall ever having briefed ExCo about the Mediation Scheme during my time at POL. Other than working on this document, I do not recall carrying out other work related to managing expectations specifically. However, as set out in this statement, I was involved in preparing communications and briefing documents for stakeholders which set out what the Mediation Scheme was.

51. I have been asked to describe the extent of my involvement in developing the internal or external communications strategy in relation to the running of the Mediation Scheme. I was involved in preparing the Mediation Scheme communications plan for Mark

Davies, which he appears to have been tasked with by ExCo (Email chain from Sophie Bialaszewski to Mark Davies, cc'd Jane Hill re Mediation Scheme Comms Plan Draft (**POL00162098**)). I prepared the plan with input from key stakeholders which is evidenced in an email from me to Mark Davies and other communications colleagues in December 2013 (Email from Sophie Bialaszewski to Mark R Davies, Jane Hill, Nina Arnott & others RE: Mediation Scheme - please can you review (**POL00198974**)). In that email, to which I attach a working draft, I say *"anything in red I'm not sure about and I'd particularly like your views on"*.

52. I have been provided with three different iterations (Mediation Scheme Communications Plan (**POL00198975**), Strictly Confidential - Mediation Scheme Communications Plan (**POL00301400**) and Mediation Scheme Communications Plan (**POL00407896**)) of this document, and would say that it was not necessarily a "communications strategy" in the traditional sense. Rather, it was a "plan of action" in response to setting up the Mediation Scheme, which focused on ensuring that communications were consistent and clear across stakeholders (including MPs). The documents that I have been provided with set out a relatively short timeline to which the plan applied – 8 July 2013 to 13 October 2014. In the context of the Mediation Scheme, which I understand ran into 2015 and well after I had left POL (in July 2014), I can only assume that additional communications plans would have been prepared after my departure as the nature of communications is to evolve, change and develop in response to evolving situations.

53. I have been asked to what extent I was involved in devising the policy to settle claims made to the Scheme and to describe how the policy was formed. I do not recall how the policy was formed, although have been assisted by the documents provided to me by the Inquiry. Based on the documents, I can see that I was copied to a thread of correspondence with other POL colleagues attaching various drafts and iterations of the policy, which appears to have been initially drafted by Bond Dickinson. I can see that all those copied to the email correspondence made comments on the draft policy.

I made what I describe as “*minor tweaks*” to a working draft on 11 November 2023 (Email from Sophie Bialaszewski to Belinda Crowe, Andy Holt, Angela Van-Den-Bogerd Re: ExCo paper - settlement policy (**POL00197021**) and Horizon - Initial Complaint Review and Mediation Scheme Settlement Policy (**POL00197022**)). My changes appear to be limited to giving my opinion from a communications point of view and ensuring that the wording in the document was consistent with other communications documents that had been prepared about the Scheme.

54. I have been asked how, when responding to queries or questions regarding Horizon, I satisfied myself that the answers I provided were accurate. I was never directly asked queries or questions about Horizon in the course of my role. When compiling communications documents or information factsheets, I relied on the relevant person within the business to provide the answer, and trusted that the responses that they provided were accurate, especially in relation to legal or technical information which was outside of my area of expertise.

55. I have been asked to describe the nature and extent of my involvement with POL decision making in respect of Second Sight’s remit and/or the scope of their instruction in the Mediation Scheme, including whether to produce thematic reports. I had no involvement in respect of Second Sight’s remit or the scope of their instruction in the Mediation Scheme. This was not the remit of Communications, rather a strategic business decision.

56. I have been asked to consider the Mediation Scheme settlement policy (**POL00197022**) and to explain what I meant by my comment at paragraph 4.1 that “*The scheme has to be seen as legitimate/credible*”. This relates to the comments and “tweaks” that I describe at paragraph 53 above. I can see from the documents that the settlement policy (**POL00197022**) contained a line that said:

"It is vital for the Post Office that...the Scheme...not only achieves its objectives but is generally considered to having successfully resolved the concerns of Subpostmasters and is acknowledged as having been a success."

57. I commented on this line in the document and said *"The scheme has to be seen as legitimate/credible"*. I suspect that my view at the time was that it was not enough for POL to know internally that the Mediation Scheme was legitimate and credible. All parties needed to agree that it was legitimate and credible, including MPs and the SPMs applying to it. If they did not, they would not have seen it as a credible scheme worth applying to.

58. I have been asked to describe the nature and purpose of the Sparrow Steering Group and the Initial Complaints Review and Case Mediation Scheme Steering Group / Programme Board, including the extent of my role on those committees.

59. I can see from the documents that I attended a Sparrow Steering Group meeting in November 2013, although I do not recall attending it. The notes of that meeting state that I was Mark Davies' deputy and that he was not in attendance. Therefore I can only assume that I attended that meeting as his deputy.

60. Similarly, I can see that I attended one of the Mediation Scheme Steering Group meetings on 16 December 2013, when Mark was not in attendance. Therefore, as above, I can only assume that I was attending that meeting as his deputy.

61. I do not recall the nature and purpose of the Sparrow or Mediation Scheme Steering Groups, although I can see that they were attended by very senior colleagues, including the CEO. On that basis, I assume that they were forums that were used to discuss issues and provide updates about Project Sparrow and later, the Mediation Scheme, to Board-level executives.

62. I was a member of the Mediation Scheme Programme Board, which I understood to be the group that had “on the ground” responsibility for the management of the Mediation Scheme. I cannot recall the Programme Board meetings that I attended but I have been assisted by the documents provided to me by the Inquiry, which indicate that I attended Programme Board meetings in January, February and March 2014. In February 2014 I was accompanied by Mark Davies from a communications perspective. I can see that at the February 2014 meeting (Initial Complaints Review & Case Mediation Scheme Programme Board (**POL00138147**)) a number of actions were assigned to me, including drafting a “*paper on media risk for ExCo*” and creating “*reactive lines that are aligned to the Second Sight themes*”. I do not recall what these specific actions relate to, however I suspect I would have worked with the relevant stakeholders (and Mark Davies) to take them forward as was usual practice in my role. For example, any work relating to media would have required input from the Public Relations team. I understood that the Mediation Scheme had grown bigger in the preceding months and more resources had been pulled in, including external management consultants PA Consulting. The following day, I sent an email to Mark Davies (Email from Sophie Bialaszewski to Mark R Davies and Jane Hill RE: PO business improvements (**POL00344384**)) in which I said:

“Mark I am still really happy to be the point person on this working with members of the comms team – I’m really happy to do the work I will just need guidance re positioning with the media/MPs (from those that have more experience than me).”

63. I suspect that I raised this with Mark because, as above, the Mediation Scheme had grown and there was more going on, it was rightly getting more attention within the organisation, including at Executive and Board level.

64. I have been asked to consider the document entitled “Email from Jarnail A Singh to Andy Holt, Chris Aujard, Belinda Crowe and Others RE: FW: Post Office Ltd - Draft

Prosecution Policy” (**POL00196662**) and the attached POL Prosecution Policy reviewed by Simon Clarke - Cartwright King (**POL00196663**) and explain the nature and extent of my involvement in considering POL’s prosecution policy. I had no involvement in formulating or considering POL’s prosecution policy. I may have been asked about how to formulate communications relating to it, but had no involvement in determining the content.

65. I have reviewed other documents provided to me by the Inquiry and can see that I was copied to correspondence with Jarnail Singh and other stakeholders later in October 2013 (Email from Jarnail A Singh to Andy Holt, Chris Aujard, Belinda Crowe, Angela Van-Den-Bogerd & others cc Hugh Flemington RE: Post Office Ltd - Draft Prosecution Policy (**POL00329696**)) which Jarnail provided information about POL’s prosecution policy, in particular the factors taken into account by POL when deciding to prosecute. I can only assume that I was collating information to include in a communications document for the Mediation Scheme, and Jarnail was providing the information we had requested. A similar approach is evidenced in email correspondence in January 2014 (Email from Jarnail Singh to Sophie Bialaszewski re: Post Office Ltd /Abbas & Daw - 41459 - Selsey Road - POLTD/1314/0014 [BD-4A.FID20472253] (**POL00382925**)) in which I request information from the Legal team for the “*Media Q&A bank of questions were are developing*”, in which I ask the question “*If we were to be asked by the press...what is your prosecution policy?*”. I also can see from the documents that I prepared a “reactive briefing” regarding the prosecutions policy for Chris Aujard in the Legal team in February 2014 (Prosecutions Policy Reactive Briefing (**POL00200785**)). A reactive briefing is prepared to ensure that the business is prepared for external enquiries and has a consistent communications approach to deal with those. I can see from the documents that POL was making changes to its prosecution policy at the time therefore I assume that the Communications team was being asked to prepare a

reactive briefing in relation to that, which is common practice. Based on the documents, it appears that I was coordinating sign off of this document.

66. I have been asked to consider some undated handwritten notes and some emails with further notes (Note and printed/annotated email from Belinda Crowe to Sophie Bialaszewski re: Sparrow comms and agenda (**POL00417116**)) and to confirm if they are my notes. I have also been asked to provide the background to making these notes. The handwriting in these notes looks like mine at the time. I do not recall making these notes but having studied the document it appears to be an agenda of some sort, and notes from a meeting. The notes are not dated nor do they indicate what meeting they relate to or who that meeting might have been with. I cannot assist the Inquiry any further in this respect.

67. I have been asked to what extent I was involved in decision making in respect of (a) modifying the Mediation Scheme and/or Working Group and (b) closing the Working Group. I had no involvement in decision making in respect of modifying the Mediation Scheme or Working Group or closing the Working Group. My involvement in the Scheme was limited to the early stages, and as set out earlier in this statement, I left POL in July 2014.

Project Zebra

68. I have been asked to explain the nature and extent of my involvement with Project Zebra. "Project Zebra" is not a term I was familiar with or aware of during my time at POL. I am now aware that the term "Project Zebra" related to a piece of assurance work carried out by Deloitte for POL in 2014, which I was aware of to a limited extent during my time at POL. I was not, however, directly involved in that work.

69. I have been asked to explain what I was told about the findings of Project Zebra and/or what POL planned to do in response to the Deloitte reports. As set out in paragraph 17 above, I can see from the documents that from around April 2014 that Deloitte was carrying out an assurance exercise for POL related to Horizon and that it would be producing a report as a result. I do not recall ever hearing the term "Project Zebra" during my time at POL. I do not recall being provided with the reports or being privy to any discussions as to what POL planned to do in response to the findings. In any event, I understand that the final report was delivered in June 2014, at which point I had handed in my one months' notice to leave POL.

Conclusion

70. I have been asked to reflect on my time at POL and set out whether there is anything I would have handled differently with hindsight. I can confirm that there is nothing that I would have handled differently with hindsight. If I ever felt that I was being asked to do something wrong, I would have escalated to the Head of Public Affairs (who was my line manager) or to the Director of Communications and made it clear that I was uncomfortable.

71. I have been asked if there is anything further relevant to the Inquiry's terms of reference of which I think the Chair of the Inquiry should be aware and I can confirm that from my perspective, there is not.

Statement of Truth

I believe the content of this statement to be true.

Signed: _____

GRO

Dated: 12-Nov-2024

Index to First Witness Statement of Sophie Louise Underwood

No.	URN	Document	Control Number
1	POL00029650	Interim Report into the alleged problems with the Horizon system	POL-0026132
2	POL00141561	Regular call re Horizon Issues – Meeting minutes from 19/07/2013	POL-0142946
3	POL00006357	Advice on the use of expert evidence relating to the integrity of the Fujitsu Services Ltd Horizon System	POL-0017625
4	POL00129453	Simon Clarke's Advice re: Disclosure - The Duty to record and retain material - Post Office LTD	POL-0134937
5	POL00028069	Deloitte Draft Board Briefing document further to report on Horizon desktop review of assurance sources and key control features	POL-0023072
6	POL00304030	Email from Sophie Bialaszewski to David Oliver, Rodric Williams, Belinda Crowe and others re: RE: Draft paper for the Board	POL-BSFF-0142080
7	POL00100123	Email from Sophie Bialaszewski to Paula Vennells cc: Chris Aujard re: Second Sight	POL-0099706
8	UKGI00002126	Email from Peer Batten to Belinda Crowe, Martin Edwards and others re: Horizon PQs	UKGI012940-001
9	POL00137370	Regular Call re Horizon Issues - Name, Area and Issues / Observations / Comments	POL-0135345
10	WBON0000802	POL Meeting Minutes from Regular Call Re: Horizon Issues on 7 August 2013	WBD_000672.000001
11	POL00083930	Meeting Minutes for Regular Call re Horizon Issues	POL-0080861

12	POL00089720	Meeting Minutes for Regular Call re Horizon Issues	POL-0086695
13	POL00083935	Bond Dickinson Agenda for Regular Call re Horizon Issues, and action points from last meeting on 21 August 2013	POL-0080866
14	POL00146088	Email from Sophie Bialaszewski to Alan Bates cc Ruth Barker, Angela Van Den Bogerd re Mediation Pack Letter and Information	POL-BSFF-0005215
15	POL00146089	Letter from Angela Van Den Bogerd to Alan Bates re Initial Complaint Review and Mediation Scheme (to be known as the Scheme)	POL-BSFF-0005216
16	POL00146090	Letter from Angela Van-Den-Bogerd to Alan Bates to be distributed to SPMs re: Initial Complaint Review and Mediation Scheme (to be known as the Scheme)	POL-BSFF-0005217
17	POL00200202	Email from Sophie Bialaszewski to Angela Van-Den-Bogerd RE: Feedback	POL-BSFF-0038265
18	POL00146799	Initial Complaint Review and Mediation Scheme - Managing Expectations	POL-BSFF-0005926
19	POL00162098	Email chain from Sophie Bialaszewski to Mark Davies, cc'd Jane Hill re Mediation Scheme Comms Plan Draft.	POL-0150543
20	POL00198974	Email from Sophie Bialaszewski to Mark R Davies, Jane Hill, Nina Arnott & others RE: Mediation Scheme - please can you review	POL-BSFF-0037037
21	POL00198975	Mediation Scheme Communications Plan	POL-BSFF-0037038
22	POL00301400	Strictly Confidential - Mediation Scheme Communications Plan	POL-BSFF-0139450
23	POL00407896	Mediation Scheme Communications Plan	POL-BSFF-0232835

24	POL00197021	Email from Sophie Bialaszewski to Belinda Crowe, Andy Holt, Angela Van-Den-Bogerd Re: ExCo paper - settlement policy	POL-BSFF-0035084
25	POL00197022	Horizon - Initial Complaint Review and Mediation Scheme Settlement Policy	POL-BSFF-0035085
26	POL00138147	Initial Complaints Review & Case Mediation Scheme Programme Board	POL-BSFF-0000378
27	POL00344384	Email from Sophie Bialaszewski to Mark R Davies and Jane Hill RE: PO business improvements	POL-BSFF-0170105
28	POL00196662	Email from Jarnail A Singh to Andy Holt, Chris Aujard, Belinda Crowe and Others RE: FW: Post Office Ltd – Draft Prosecution Policy	POL-BSFF-0034725
29	POL00196663	POL Prosecution Policy reviewed by Simon Clarke - Cartwright King	POL-BSFF-0034726
30	POL00329696	Email from Jarnail A Singh to Andy Holt, Chris Aujard, Belinda Crowe, Angela Van-Den-Bogerd & others cc Hugh Flemington RE: Post Office Ltd - Draft Prosecution Policy	POL-0175825
31	POL00382925	Email from Jarnail Singh to Sophie Bialaszewski re: Post Office Ltd /Abbas & Daw - 41459 - Selsey Road - POLTD/1314/0014 [BD-4A.FID20472253]	POL-BSFF-0209812
32	POL00200785	Prosecutions Policy Reactive Briefing	POL-BSFF-0039250
33	POL00417116	Note and printed/annotated email from Belinda Crowe to Sophie Bialaszewski re: Sparrow comms and agenda.	POL-BSFF-0237267