

Witness: Rodric David Alun Williams
Statement No.: WITN08420200
Dated: 2 October 2024

POST OFFICE HORIZON IT INQUIRY

**SECOND WITNESS STATEMENT OF
RODRIC DAVID ALUN WILLIAMS**

I, RODRIC DAVID ALUN WILLIAMS, will say as follows:

INTRODUCTION

1. This is my second statement to the Post Office Horizon IT Inquiry ("**the Inquiry**"). I make this second witness statement in response to a request made under Rule 9 of the Inquiry Rules 2006 ("**the Request**") dated 5 August 2024. The Request contains questions relevant to Phases 5, 6 and 7 of the Inquiry.
2. On 11 March 2024 I signed my first witness statement (**WITN08420100**). I appeared and gave evidence to the Inquiry on 18 and 19 April 2024. This second statement is supplemental to my first witness statement and my evidence to the Inquiry. I instructed a firm of solicitors to support me in my preparation of this witness statement.
3. To assist the Inquiry with the clarifications they are seeking in the Request in respect of Phases 5 and 6, I have undertaken searches of my POL Outlook, to which I still have access as a current POL employee. I have carried out these searches to the best of my ability to try to locate relevant documents. I have not

had any technical or other assistance with searching or analysing my Outlook. In the process of reviewing emails, it has become clear that the timestamps of emails are not consistent,¹ which has made the process of reconstructing chronologies of events from the documents more challenging.

4. Given the time available to respond to the Request, I have limited this statement to responding to the questions in it, and have not sought to comment on or address any other evidence before the Inquiry as part of Phases 5 and 6.

BACKGROUND

5. There have been no updates in respect of my position since the submission of my first witness statement. I remain a Head of Legal at POL but do not currently have responsibilities within the Remediation Unit. I transferred my responsibilities to the other lawyers within the unit's legal team so that I would have the capacity to respond to requests from the Inquiry. Paragraph 15 of my first witness statement remains accurate.

PHASE 5/6 CLARIFICATION

Email Accompanying Board Briefing of 4 June 2014

6. The Inquiry has shared with me an email from Alwen Lyons to me of 4 June 2014 (**POL00029733**) and an attached briefing document for the Board prepared by Deloitte (**POL00130618**) (the "**Board Briefing**"). The email from Alwen Lyons forwards to me an email message that had been sent on behalf of Chris Aujard and Lesley Sewell to members of the Board, enclosing the Board

¹ In this statement, the timestamps of emails are taken from the exhibited documents. I have identified occasions where these differ from the timestamps of emails I located in my Outlook, but I have not sought to identify each occasion where such a discrepancy occurs.

Briefing. I have been asked about my role in drafting the email from Chris Aujard and Lesley Sewell that accompanied the Board Briefing.

7. As I explained at paragraph 113 of my first witness statement, my recollection is that the Board Briefing was a document that Chris Aujard asked Deloitte to prepare for the Board, and that I was involved in discussions with Deloitte about it. In preparing this statement I have located correspondence describing Lesley Sewell as “co-sponsoring” the Board Briefing (**POL00458682**). Sending the email enclosing the Board Briefing to the Board in Chris Aujard and Lesley Sewell's names also suggests that they were the members of the POL executive team² sponsoring this work.

8. At 17:42 on 4 June 2014, I sent an email to Paula Vennells and Alwen Lyons with Chris Aujard, Lesley Sewell and Martin Edwards in copy (**POL00304766**). In this email, I have written:

“Hi Paula, Alwen – below is the message that Chris and Lesley would like to send to the Board attaching the final draft of Deloitte’s Briefing on their review. Alwen – would you be able to send this once you have Paula’s approval?”

The email then sets out a proposed email to be sent to the Board in Chris Aujard and Lesley Sewell's names, which I refer to in my statement below as the “Proposed Text”. The Proposed Text was used by Alwen Lyons in her

² The Request refers to the “POL executive team”, which I understand to mean those who were on the 'ExCo' or 'Group Exec'/GE' committee reporting to POL's Board. See paragraph 12 of my first witness statement.

email to the Board shared with me by the Inquiry (**POL00029733**). The Board Briefing is also attached to my email (**POL00130618**).

9. Although I have seen emails exchanged during the course of 4 June 2014 with Chris Aujard and Lesley Sewell concerning the Board Briefing,³ I have not been able to locate any email correspondence with them regarding the Proposed Text. I cannot now, 10 years later, recall drafting the Proposed Text or any specific conversations with Lesley Sewell, Chris Aujard, or anyone else about it. However, I do not believe I would have sent the Proposed Text to Alwen Lyons without discussing it at some level with Chris Aujard first, and possibly also with Lesley Sewell, given that it was proposed to be sent to the Board in their names. The Proposed Text contains information relating to the Sparrow Sub-Committee that I do not believe would have been within my own knowledge at that time as I was not a member of that Sub-Committee, and the inclusion of this information supports my view that it was drafted with at least some input from Chris Aujard, who I believe was a member of the Sparrow Sub-Committee. I copied Chris Aujard and Lesley Sewell into my email to Paula Vennells and Alwen Lyons at **POL00304766**, giving them sight of the Proposed Text and providing them with the opportunity to comment on it if it did not reflect their position or any instructions received from them. I have no record of receiving any such comments from them.
10. At 18:06 on 4 June 2014, Paula Vennells responded to my email indicating that it was for Chris Aujard to approve the Proposed Text (**POL00304771**). At 18:09

³ See for example email from Chris Aujard to me dated 4 June 2014 at 09:14 (**POL00458681**); **POL00458682**; and my email to Lesley Sewell dated 4 June 2014 at 14:09 (**POL00458683**).

on 4 June 2014, Alwen Lyons responded to Paula Vennells' email asking Chris Aujard if the Proposed Text and Board Briefing could be sent (**POL00108630**). I have not been able to locate a response from Chris Aujard to Alwen Lyons but it may be that I was not copied in.

11. I cannot now specifically recall drafting the email that I sent to Paula Vennells and Alwen Lyons containing the Proposed Text (**POL00304766**), or the process I used to draft it. I believe however I would have been trying to introduce and put into context the Board Briefing, summarise what we understood the key findings of it to be, signpost key limitations, and identify next steps, so that the recipients of the email could more easily understand why they had been sent it. The third paragraph of the Proposed Text states that the Board Briefing is based on a desktop review of currently available information and "*is therefore heavily caveated*". In the fourth paragraph, before summarising the key findings, it states that: "*Deloitte expressly identify a number of limitations and assumptions which underpin their findings (see Section 3 "Limitations and Assumptions"). The briefing must be read in this context.*" (emphasis in my original Proposed Text). Those paragraphs flagged the importance of reading the Board Briefing in the context of those limitations. It appears that the emphasis in the Proposed Text, included in my email to Alwen Lyons (**POL00304766**), may have been lost on some subsequent versions of the email (for example at **POL00108630**).
12. It was my expectation that the Board Briefing itself would be read by Board members and they would form their own views on it. It was a document specifically prepared for the Board by subject matter experts, Deloitte, and

considerable efforts had been made by Deloitte and POL to make it accessible to the members of the Board. I believe I would have drafted the Proposed Text in that context. I would have expected feedback from Chris Aujard if anyone had found the Proposed Text to be unhelpful. I do not recall receiving any feedback about the Proposed Text from anyone.

Next Steps in Respect of the Board Briefing

13. I have been asked to set out what steps the POL executive team took to follow up on the issues raised in the Board Briefing, and the extent of my involvement in that work. I do not recall attending any Board meetings at which the Board Briefing or any of Deloitte's work was discussed. As mentioned at paragraph [7] above, it is my understanding that the members of the POL executive team sponsoring the work were Chris Aujard and Lesley Sewell. I am aware that they continued to be involved in the work that Deloitte were undertaking.⁴ I do not recall what Chris Aujard and Lesley Sewell's work entailed, nor working with them on it.

14. In responding to the Request, I have located in my Outlook emails indicating that members of POL staff outside of the POL executive team were undertaking work related to Deloitte's work.⁵ I do not however know what steps members of

⁴ See the email from Julie George to Rod Ismay, David Mason and Malcolm Zack sent 17 June 2014 at 09:02 (**POL00346958**), which was put to me during my evidence of 19 April 2024; the email from Chris Aujard to me, David Mason, Rod Ismay, Julie George and Malcolm Zack re "FW: Project Zebra" sent 2 July 2014 at 11:43 (**POL00305039**), which includes an email from Gareth James to Chris Aujard and Lesley Sewell dated 10 June 2013 that references meeting with them on 9 June 2013; and the email from Julie George to Belinda Crowe and others dated 19 August 2014 at 08.26 (**POL00458689**).

⁵ See email from Julie George to me dated 5 June 2014 at 08:34 (**POL00458684**) email from Julie George to Rod Ismay and others dated 10 June 2014 at 06:34 (**POL00458685**); email from Julie George to Gareth James and others dated 18 July 2014 at 09:59 (**POL00458686**); and **POL00458689**.

the executive team took in connection with this, and any decision to instruct Deloitte to expand or progress work would, I believe, have been a matter for the POL executive team and may have required Board input or support. As mentioned at paragraph 114 of my first witness statement, I appear to have attended a call with Deloitte, POL IT and Internal Audit colleagues on 2 July 2014. From the notes of that meeting, which Deloitte produced, my primary concern appears to have been with "*balancing transactions*".⁶ I took steps to get Deloitte's work released to Womble Bond Dickinson and Cartwright King so it could be considered as part of the support they were providing for POL.⁷ As explained at paragraph 147 of my first witness statement, balancing transactions was something that Womble Bond Dickinson later discussed further with Deloitte. Although there is a reference to a draft of the Project Zebra Report being "*with our legal team*" in August 2014,⁸ I do not know what this is a reference to. It may have been that further feedback from the POL legal team was expected.

Prosecution and Convictions Section of the Notification to Insurers

15. The Inquiry has shared with me **POL00112856** (notification to insurers). I have been asked about my role in the drafting of the 'Prosecutions and Convictions' section of this notification and any issues arising.

⁶ Email from Gareth James to me, Julie George and Rod Ismay dated 2 July 2014 at 23.16 (**POL00138459**)

⁷ Email from Gareth James to me dated 21 July 2014 at 11:58 (**POL00458687**) and my email to Mark Westbrook dated 15 August 2014 at 15:28 (**POL00305703**).

⁸ Email from Julie George to Mark Westbrook and others dated 11 August 2014 at 11.05 (**POL00458688**)

16. At 16:45 on 6 August 2013 (**POL00193243**) I received an email from Andrew Parsons attaching a draft note on D&O risks dated 7 August 2013 (**POL00193244**) for my review and comments (“**the 7 August 2013 Note**”). The 7 August 2013 Note was to act as notification to POL’s insurers. It contained a section entitled “*Prosecutions & Convictions*” which stated:

“As noted above, in rare circumstances, the Post Office prosecutes subpostmasters who have acted criminally. The basis of these prosecutions is often found in the transaction records recorded in Horizon. As a result of Second Sight’s investigation/Interim Report, Post Office is reviewing all its criminal prosecutions over the last three years to identify any cases where a conviction may be unsafe.

In particular, the expert evidence of one Post Office witness, Dr Gareth Jenkins of Fujitsu, may have failed to disclose certain historic problems in the Horizon system. Under the criminal prosecution guidelines, Post Office has an obligation to disclose (even retrospectively) this previously undisclosed information to subpostmasters’ defence counsel. Post Office is required to make these retrospective disclosures where the additional information (ie Dr Jenkins’ knowledge of historic, but now resolved, problems with Horizon) may have undermined a prosecution case or assisted with an accused’s defence.”

17. At 17:44 on 15 August 2013 (**POL00193583**), I received an email from Andrew Parsons attaching an updated version of the Note dated 15 August 2013 (“**the 15 August 2013 Note**”) (**POL00193585**). The email from Andrew Parsons

records that the 15 August 2013 Note incorporates my "suggestions", but I do not recall now, 11 years later, what those were and have not been able to locate any material beyond the updated note indicating what they might have been. A comparison of the 7 August 2013 Note and the 15 August 2013 Note shows that the "Prosecutions & Convictions" section of each are substantially the same with one amendment: the 15 August 2013 Note states that the Post Office prosecutes subpostmasters "where circumstances warrant", whereas the 7 August 2013 Note had stated that Post Office prosecutes subpostmasters "in rare circumstances".

18. At 14:54 on 16 August 2013, I emailed Martin Smith of Cartwright King (cc'ing Jarnail Singh) a copy of the 15 August 2013 Note that I had received from Andrew Parsons and requested "any comments on this from a criminal law perspective..." (POL00298369). Although I do not now recall this specifically, I believe I will have requested input from Martin Smith because the 15 August 2013 Note, particularly the "Prosecutions & Convictions" section of it, dealt with criminal law matters which neither Bond Dickinson nor I were expert in, and I would have wanted the Note to be accurate.

19. At 12:18 on 26 August 2013, I emailed Andrew Parsons (POL00040025) an updated version of the Note dated 23 August 2013 ("the 23 August 2013 Note") (POL00040026). The 23 August 2013 Note states (changes underlined):

"As noted above, where circumstances warrant, Post Office prosecutes subpostmasters who have acted criminally. The basis of these prosecutions is often found in the transaction records recorded in Horizon.

As a result of Second Sight's investigation/Interim Report, Post Office is reviewing all its criminal prosecutions which have had a hearing since 1 January 2010.

Post Office has an obligation to consider whether further discourse [sic] should be made to defendants. It is of concern to Post Office that the expert evidence of one prosecution witness, Dr Gareth Jenkins of Fujitsu, may have failed to disclose certain problems in the Horizon system potentially relevant to a case.

20. My email to Andrew Parsons stated that the Note had been updated "with input from Cartwright King on the criminal law risks", and the version of the Note attached to that email had been saved under the title "Insurance_Risks_(with_CK_amendments)_22.08.13.docx" (POL00040026). I believe this shows that the amendments made to the 23 August 2013 Note reflected input from Cartwright King, as I would not have said that otherwise. I assume this will have come from Martin Smith, either in person or by telephone, given I sent my email request for input to him, but have not been able to locate an email in reply. I believe this section was seeking to reflect the "Sift Review" Cartwright King was undertaking for POL to determine the specific prosecutions where further disclosure was required, and it would not have been in POL's interest to misstate that in a notification to insurers.

21. In my email to Andrew Parsons of 26 August 2013, I asked him to check that the Note would still serve the purpose of notifying insurers of the grounds for

potential claims. At 13:49 on 26 August 2013, he replied enclosing the 23 August 2013 Note and stating (in part) *"The note and email look good"* (**POL00458680**). At 16:19 on 28 August 2013, I sent the cover email (**POL00242854**) and text of the 23 August 2013 Note (**POL00242856**) to Miller Insurance.

Briefing Note for Paula Vennells

Overview

22. I have been asked by the Inquiry to consider **POL00145089**. This contains the text of a briefing note for Paula Vennells for a meeting with James Arbuthnot, which is also referred to in contemporaneous correspondence as a 'speaking note'. I have been asked to set out: (1) my role in the drafting of the Current Prosecutions and Historical Prosecutions section of this note and (2) the issues concerning the note that I produced, referred to by Susan Crichton in the covering email.

23. In this statement I will refer to the briefing note prepared for the meeting with James Arbuthnot as the "Speaking Note", to distinguish it from a separate "Briefing Note" I was drafting at the same time. The Briefing Note was a document which, as I set out at paragraph 58 of my first witness statement, I was co-ordinating. The Speaking Note appears to have been drafted at the same time by others who worked more closely with Paula Vennells and were more familiar with the public affairs context in which the notes were being prepared. I was aware by being copied into emails that the Speaking Note was being drafted, and that it covered similar subject matter to the Briefing Note, but

I do not recall considering the contents of the Speaking Note in detail. My focus would have been on the Briefing Note, for which I was 'holding the pen'. I set out below a summary of my understanding of how the Briefing Note and Speaking Note were created and developed, based on documents I have reviewed whilst preparing this statement.

Briefing Note

24. I set out in paragraph 58 of my first witness statement that on 2 July 2013 I was asked by Hugh Flemington and Susan Crichton to co-ordinate revisions to a draft briefing note he had prepared for Paula Vennells,⁹ so as to provide a consolidated overview of the background to and issues arising out of the draft Second Sight Interim Report.¹⁰ Following receipt of the Request, I have undertaken a further review of my Outlook to try to understand whether I had any input into the Speaking Note. As set out below, I have located emails which show that I first became involved in the drafting of the Briefing Note on Thursday 27 June 2013, a few days earlier than Tuesday 2 July 2013 as stated in my first statement.
25. On 27 June 2013, I instructed Andrew Parsons by email to prepare a response document to Second Sight's Interim Report which was due to be published imminently (**POL00189184**). At 17:13 that day, Andrew Parsons emailed me (**POL00189205**) attaching the draft response document (**POL00189206**). At

⁹ This is the document that I refer to as the Briefing Note in this statement.

¹⁰ Email from Rodric Williams to Lesley Sewell and others dated 2 July 2013 at 14.19 (**POL00115918**); and 'Internal Briefing Note to Paula Vennells: Second Sight review into Horizon – Implications of Interim Report' dated 2 July 2013 (**POL00115919**)

17:54, I emailed the draft response document to Lesley Sewell, Hugh Flemington and Alwen Lyons (**POL00296725**). In my cover email, I stated that this could also act as a briefing note for Alice Perkins. Over the following days a number of iterations of the draft were circulated and revisions were suggested by a number of individuals at POL. Jarnail Singh's input was sought on a number of occasions in relation to criminal law matters as he was POL's in-house criminal lawyer. As I was 'holding the pen' in respect of the Briefing Note, I would have sought to reflect the amendments and comments received into updated drafts, which I would re-circulate.¹¹

Speaking Note for Meeting with James Arbuthnot

26. On 2 July 2013 at 19:33 Susan Crichton circulated what I now believe to be the first iteration of the Speaking Note. I was not copied into that email from Susan Crichton, but Hugh Flemington forwarded it to me and Jarnail Singh on 2 July 2013 at 20:56¹² (**POL00458679**). I believe Hugh Flemington forwarded this and another email chain regarding the Speaking Note (see below at paragraph [28])

¹¹ See in particular email from me to Alwen Lyons (with Hugh Flemington copied in) at 21:59 on 27 June 2013, attaching an updated version of the briefing note (**POL00189436**); email from me to Jarnail Singh at 06:39 on 28 June 2013 asking him questions about pre-separation prosecutions (**POL00296754**); email from Jarnail Singh to me at 09:44 on 28 June 2013 in response to my questions and my response (**POL00296787**); email from me to Jarnail Singh at 17:09 on 28 June 2013 with a copy of the current version of the Briefing Note at his request (**POL00189534**); email from Jarnail Singh to me at 17:12 on 30 June 2013 providing further information on the prosecutions part of the draft Briefing Note (**POL00296855**); email from me to Lesley Sewell, Alwen Lyons and Hugh Flemington with Simon Baker, Gina Gould, Martin Edwards, Jarnail Singh and Mark Davies in copy at 01:06 on 1 July 2013 circulating an updated draft of the Briefing Note (**POL00296858**); email from Hugh Flemington to me, Alwen Lyons and Martin Edwards on 1 July at 12:14 (**POL00144948**); email from Alwen Lyons to me at 20:07 on 1 July 2013 (**POL00380977**); email from Simon Baker to Rodric Williams at 20:30 on 1 July 2013 (**POL00296942**) with attached draft (**POL00296943**); and email from me to Lesley Sewell, Susan Crichton, Mark Davies, Alwen Lyons, Martin Edwards and Simon Baker with Hugh Flemington and Jarnail Singh in copy at 13:18 on 2 July 2013, circulating updated version of the draft Briefing Note dated 2 July 2013 (**POL00296960** and **POL00296963**).

¹² There is a discrepancy between timestamps in the email I can see in my Outlook (20:56) and the email that has been disclosed to the Inquiry (19:56).

to me so that I could see the work being undertaken on the Speaking Note in parallel to the Briefing Note.

27. At 21:43 on 2 July 2013,¹³ Martin Edwards emailed me, Lesley Sewell, Susan Crichton, Alwen Lyons and Simon Baker with Hugh Flemington, Mark Davies and Jarnail Singh in copy asking if there had been any updates to the latest draft of the Briefing Note which I had circulated earlier that day. In this email, Martin Edwards stated: *"Would be good to send Paula and Alice the latest version alongside the speaking note."* (POL00368546). I replied to this at 23:07 stating *"I'm just updating it now – I will resend shortly, adding Nina and Ruth."* (POL00368548).
28. At 22:30 on 2 July 2013, Hugh Flemington forwarded to me with *"Fyi"* an email exchange between Martin Edwards and Susan Crichton concerning the prosecutions section of the Speaking Note (POL00368552).
29. At 22:38 on 2 July 2013, I emailed Mark Davies and Martin Edwards with Lesley Sewell, Susan Crichton, Alwen Lyons, Simon Baker, Hugh Flemington, Jarnail Singh, Nina Arnott and Ruth Barker in copy (POL00297032) with the updated draft of the Briefing Note (POL00297033).
30. I now understand from evidence before the Inquiry that during the evening of 2 July 2013, Martin Edwards and Mark Davies exchanged emails making amendments to the Speaking Note (POL00297040). I do not appear to have

¹³ The document I am exhibiting, which has been disclosed to the Inquiry, shows this email to have been sent at '21:43'. When I view the email in my POL Outlook it shows it as being sent at 22:43.

been copied in to those exchanges and do not have any recollection of them. At 23.44 on 2 July 2013, Mark Davies responded to my email circulating the latest draft of the Briefing Note (see paragraph [29] above) seeking a clarification in relation to a particular prosecution. I responded at 23.55 indicating that we had limited information regarding this prosecution and that we should know more tomorrow (**POL00297081**).

31. At 00:16 on 3 July 2013, I emailed Martin Edwards informing him that there was one amendment (which concerned the "62 Branch Exception") to the draft Briefing Note which I had just circulated (and was attached **POL00368557**) that "*should track across into the one Susan prepared*" (**POL- POL00368556**). The "*one Susan prepared*" is I believe a reference to the Speaking Note. At 00:16 on 3 July 2013, Martin Edwards replied to say he would make this amendment (**POL00368555**).
32. At 02:04 on 3 July 2013, Martin Edwards circulated a version of the Speaking Note to Alice Perkins and Paula Vennells, copying Susan Crichton, Alwen Lyons, Mark Davies, Hugh Flemington, Simon Baker and me. Martin Edwards' email is the first email in the chain at **POL00145089**. I do not recall reading the Speaking Note before the meeting with James Arbuthnot took place, and may not have done so given my understanding of who was involved in preparing it, my focus on the Briefing Note, and the timing of this email (the lateness of the hour and its proximity to the meeting with James Arbuthnot). If I did, I do not believe I would have commented on the Current Prosecutions and Historical Prosecutions section (or indeed any other section) given that the Speaking Note

had been drafted by colleagues who had the latest draft of the Briefing Note and a better understanding of what the Speaking Note was required to address.

Issues referred to by Susan Crichton in her email (POL00145089)

33. I have been asked by the Inquiry to comment on “the issues concerning the note” that I produced, referred to by Susan Crichton in her email of 3 July 2013 at 07:13 (POL00145089). I understand “the note” to be a reference to the Briefing Note described at paragraphs [24], [25], [29] and [31] above.

34. We were working in a very fast paced environment at the time the Briefing Note was being prepared, and had received a great deal of information concerning the matters traversed in it in a short period of time, meaning the Briefing Note needed to be updated constantly. In her email Susan Crichton considered the Briefing Note required some “updating”, but I do not know which part or parts of the Briefing Note she was referring to, and I do not recall her communicating to me any specific issues she may have had with the Briefing Note. Susan Crichton had been copied in to two emails prior to this that indicated that the Briefing Note would need to be updated, so it may be that she was referring to these parts of the Briefing Note.¹⁴

¹⁴ See emails from Mark Davies sent at 23:44 on 2 July 2012 and Lesley Sewell sent at 07:06 on 3 July 2013 raising issues with the “Merthyr Dyfan case” and “Rudkin Spot Review” respectively (POL00297081). Please note that there is a timestamp discrepancy between the document disclosed to the Inquiry and the document in my Outlook in respect of the email from Lesley Sewell. My Outlook indicates that it was sent at 08.06, which would be after Susan Crichton had sent her email at POL00145089.

LESSONS LEARNED

35. I have been asked by the Inquiry to set out any conversations that I have had with the current executive team or Board of POL regarding my involvement in the matters being investigated by the Inquiry and their response to the same. I do not recall any specific discussion with the current executive team or POL Board regarding my involvement in the matters being investigated by the Inquiry. When the scope of the Inquiry was expanded in Spring 2021 to include matters in which I may have been personally involved, I emailed the General Counsel Ben Foat and Historical Matters Director Declan Salter concerning the conflict or potential conflict of interest this could create between POL and me around POL's participation in the Inquiry, following which I ceased providing legal support to POL with respect to its participation in the Inquiry.
36. I have been asked by the Inquiry to set out any internal investigations, inquiries or lessons learned exercises that have taken place into my involvement in the matters being investigated by the Inquiry and their findings. I am not aware of any internal investigations or inquiries that have taken place into my involvement in the matters being investigated by the Inquiry. I am however aware that shortly after the conclusion of the Group Litigation, POL's Board commissioned a review of events that led to that litigation. I did not have any involvement in that review, but it is possible that it considered matters being investigated by the Inquiry and my involvement in them. I understand that POL maintains and retains privilege over the instruction, communications and output regarding this review.

37. I have been asked by the Inquiry to set out any changes within POL that have been implemented as a result of my involvement in the matters being investigated by the Inquiry (if any). Since the handing down of the judgments in the Group Litigation, I know that across POL a great deal of work has been undertaken to try to remedy the issues raised in the various legal judgments and observations made as part of them, for example so that POL engages with serving postmasters consistently with the postmaster contracts as construed by the Group Litigation's Common Issues Judgment, to establish and fund compensation schemes, and to consider claims made to them. As set out at paragraph 20 of my first witness statement, my primary role at POL has been to manage POL's legal risks and facilitate the provision of appropriate legal support and advice to the business. My role therefore has been to support rather than lead these activities, and I believe others are better placed to speak to the detail of them.
38. I have sought to provide this support cognisant of the criticisms that have been made against POL, and of POL's desire to address and not repeat them. I have done so because that is consistent with the legal judgments and observations which have been made, and because it is clearly the right thing to do given the profound personal impact these matters have had on the people affected. I would therefore like to reiterate what I said at the conclusion of my first witness statement, that I hope that a resolution to these matters is achieved soon for all those who might have been affected.

39. I am happy to assist the Inquiry further if required.

STATEMENT OF TRUTH

I believe the content of this statement to be true.

GRO

Sig _____

RODRIC DAVID ALUN WILLIAMS

Dated: 2 October 2024

Index to Second Witness Statement of Rodric David Alun Williams

No.	URN	Document Description	Control Number
1.	WITN08420100	First witness statement of Rodric David Alun Williams	WITN08420100
2.	POL00029733	Email from Alwen Lyons to Rodric Williams dated 4 June 2014 at 18:27	POL-0026215
3.	POL00130618	Deloitte Draft Board Briefing document further to report on Horizon desktop review of assurance sources and key control features dated 4 June 2014	POL-0120670
4.	POL00458682	Email from Rodric Williams to Gareth James dated 4 June 2014 at 09:25	POL-BSFF-WITN-052-0000007
5.	POL00304766	Email from Rodric Williams to Paula Vennells and Alwen Lyons, with Chris Aujard, Lesley Sewell and Martin Edwards in copy dated 4 June 2014 at 17:42	POL-BSFF-0142816
6.	POL00458681	Email from Chris Aujard to Rodric Williams dated 4 June 2014 at 09:14	POL-BSFF-WITN-052-0000006
7.	POL00458683	Email from Rodric Williams to Lesley Sewell dated 4 June 2014 at 14:09	POL-BSFF-WITN-052-0000008
8.	POL00304771	Email from Paula Vennells to Chris Aujard, Alwen Lyons and others dated 4 June 2014 at 18:06	POL-BSFF-0142821
9.	POL00108630	Email from Alwen Lyons to Paula Vennells, Chris Aujard and others dated 4 June 2014 at 18:09	POL-0106722
10.	POL00346958	Email from Julie George to Rod Ismay and others dated 17 June 2014 at 09:02	POL-BSFF-0172679
11.	POL00305039	Email from Chris Aujard to David Mason and others dated 2 July 2014 at 11:43	POL-BSFF-0143089
12.	POL00458689	Email from Julie George to Belinda Crowe and others dated 19 August 2014 at 08:26	POL-BSFF-WITN-052-0000016
13.	POL00458684	Email from Julie George to Rodric Williams dated 5 June 2014 at 08:34	POL-BSFF-WITN-052-0000011
14.	POL00458685	Email from Julie George to Rod Ismay and others dated 10 June 2014 at 06:34	POL-BSFF-WITN-052-0000012
15.	POL00458686	Email from Julie George to Gareth James and others dated 18 July 2014 at 09:59	POL-BSFF-WITN-052-0000013
16.	POL00138459	Email from Gareth James to Rodric Williams and others dated 2 July 2014 at 23:16	POL-BSFF-0000683

17.	POL00458687	Email from Gareth James to Rodric Williams dated 21 July 2014 at 11:58	POL-BSFF-WITN-052-0000014
18.	POL00305703	Email from Rodric Williams to Mark Westbrook dated 15 August 2014 at 15:28	POL-BSFF-0143753
19.	POL00458688	Email from Julie George to Mark Westbrook and others dated 11 August 2014 at 11:05	POL-BSFF-WITN-052-0000015
20.	POL00112856	Email from Stuart Corney to DO Claims dated 9 September 2013 at 15:34	POL-0110268
21.	POL00193243	Email from Andrew Parsons to Rodric Williams dated 6 August 2013 at 16:45	POL-BSFF-0031306
22.	POL00193244	Draft Note on "Horizon Risks" (" the 7 August 2013 Note ") dated 7 August 2013	POL-BSFF-0031307
23.	POL00193583	Email from Andrew Parsons to Rodric Williams dated 15 August 2013 at 17:44	POL-BSFF-0031646
24.	POL00193585	Updated Draft Note on "Horizon Risks" (" the 15 August 2013 Note ") dated 15 August 2013	POL-BSFF-0031648
25.	POL00298369	Email from Rodric Williams to Martin Smith and Jarnail Singh dated 16 August 2013 at 14:54	POL-BSFF-0136419
26.	POL00040025	Email from Rodric Williams to Andrew Parsons and Simon Gildener dated 26 August 2013 at 12:18	POL-0036507
27.	POL00040026	Updated Draft Note on "Horizon Risks" (" the 23 August 2013 Note ") dated 23 August 2013 Note that this document has been saved under the title: "Insurance_Risks_(with_CK_amendments)_22.08.13.docx"	POL-0036508
28.	POL00458680	Email from Andrew Parsons to Rodric Williams dated 26 August 2013 at 13:49	POL-BSFF-WITN-052-0000004
29.	POL00242854	Email from Rodric Williams to Miller Insurance dated 28 August 2013 at 16:19	POL-BSFF-0080917
30.	POL00242856	Note on "Horizon Risks" dated 23 August 2013 attached to Rodric Williams' email to Miller Insurance dated 28 August 2013 at 16:19	POL-BSFF-0080919
31.	POL00145089	Email from Susan Crichton to Martin Edwards and Hugh Flemington dated 3 July 2013 at 07:13	POL-BSFF-0004216

32.	POL00115918	Email from Rodric Williams to Lesley Sewell others dated 2 July 2013 at 14:19	POL-0116920
33.	POL00115919	Draft "Internal Briefing Note to Paula Vennells: Second Sight review into Horizon – Implications of Interim Report" dated 2 July 2013	POL-0116921
34.	POL00189184	Email from Rodric Williams to Andrew Parsons with Hugh Flemington in copy dated 27 June 2013 at 13:14	POL-BSFF-0027247
35.	POL00189205	Email from Andrew Parsons to Rodric Williams with Hugh Flemington in copy dated 27 June 2013 at 16:12	POL-BSFF-0027268
36.	POL00189206	Draft Response to Second Sight Interim Report (undated)	POL-BSFF-0027269
37.	POL00296725	Email from Rodric William to Leley Sewell, Hugh Flemington and Alwen Lyons dated 27 June 2013 at 17:54	POL-BSFF-0134775
38.	POL00189436	Email from Rodric Williams to Alwen Lyons and Hugh Flemington dated 27 June 2013 at 21:59	POL-BSFF-0027499
39.	POL00296754	Email from Rodric Williams to Jarnail Singh with Hugh Flemington in copy dated 28 June 2013 at 06:39	POL-BSFF-0134804
40.	POL00296787	Email from Jarnail Singh to Rodric Williams dated 28 June 2013 at 10:44	POL-BSFF-0134837
41.	POL00189534	Email from Rodric Williams to Jarnail Singh dated 28 June 2013 at 17:09	POL-BSFF-0027597
42.	POL00296855	Email from Jarnail Singh to Rodric Williams with Hugh Flemington in copy dated 30 June 2013 at 17:12	POL-BSFF-0134905
43.	POL00296858	Email from Rodric Williams to Lesley Sewell, Alwen Lyons, Hugh Flemington and others dated 1 July 2013 at 01:06	POL-BSFF-0134908
44.	POL00144948	Email from Hugh Flemington to Alwen Lyons, Martin Edwards, Rodric Williams and others dated 01 July 2013 at 12:15	POL-BSFF-0004075
45.	POL00380977	Email from Alwen Lyons to Rodric Williams, Susan Crichton and Hugh Flemington dated 1 July 2013 at 20:07	POL-BSFF-0207864
46.	POL00296942	Email from Simon Baker to Rodric Williams and others dated 1 July 2013 at 20:30	POL-BSFF-0134992
47.	POL00296943	Draft "Internal Briefing Note to Paula Vennells: Second Sight investigation into Horizon -	POL-BSFF-0134993

		Implications of Interim Report" dated 1 July 2013 with Simon Baker's amendments	
48.	POL00296960	Email from Rodric Williams to Lesley Sewell, Susan Crichton, Mark Davies, Alwen Lyons, Martin Edwards and Simon Baker with Hugh Flemington and Jarnail Singh in copy at 13:18 on 2 July 2013, circulating updated version of the draft Briefing Note dated 2 July 2013	POL-BSFF-0135010
49.	POL00296963	Draft "Internal Briefing Note to Paula Vennells: Second Sight review into Horizon - Implications of Interim Report" dated 2 July 2013	POL-BSFF-0135013
50.	POL00458679	Email from Hugh Flemington to Rodric Williams dated 2 July 2013 at 19:56	POL-BSFF-WITN-052-0000002
51.	POL00368546	Email from Martin Edwards to Rodric Williams and others dated 2 July 2013 at 21:43	POL-BSFF-0191963
52.	POL00368548	Email from Rodric Williams to Mark Davies and others dated 2 July 2013 at 22:06	POL-BSFF-0191965
53.	POL00368552	Email from Hugh Flemington to Rodric Williams dated 2 July 2013 at 22:30	POL-BSFF-0191969
54.	POL00297032	Email from Rodric Williams to Mark Davies and others dated 2 July 2013 at 22:38	POL-BSFF-0135082
55.	POL00297033	Draft "Internal Briefing Note to Paula Vennells: Second Sight review into Horizon - Implications of Interim Report" dated 2 July 2013	POL-BSFF-0135083
56.	POL00297040	Email from Mark Davies to Martin Edwards and others dated 2 July 2013 at 11:19	POL00297040
57.	POL00297081	Email from Rodric Williams to Mark Davies and others dated 2 July 2013 at 23:55	POL-BSFF-0135131
58.	POL00368556	Email from Rodric Williams to Martin Edwards with Hugh Flemington in copy dated 2 July at 23:16	POL-BSFF-0191973
59.	POL00368557	Draft "Internal Briefing Note to Paula Vennells: Second Sight review into Horizon - Implications of Interim Report" dated 2 July 2013	POL-BSFF-0191974
60.	POL00368555	Email from Martin Edwards to Rodric Williams with Hugh Flemington in copy dated 2 July at 23:16	POL-BSFF-0191972