

Witness Name: Calum Brian
Greenhow

Statement No.: WITN00370200

Dated: 6th November 2024

POST OFFICE HORIZON IT INQUIRY

SECOND WITNESS STATEMENT OF Calum Brian Greenhow

I, Calum Brian Greenhow, will say as follows...

1. This witness statement is made to assist the Post Office Horizon IT Inquiry (the “**Inquiry**”) and is given in order to provide updated information to the Inquiry about an aspect of my oral evidence given on 26 September 2024 in relation to questions about the NFSP’s efforts to meet with the Lord Advocate and the Cabinet Secretary for Justice.
2. Prior to my oral evidence, I provided a witness statement (WITN00370100) to the Inquiry. The NFSP provided a number of documents to the Inquiry to accompany that witness statement, in particular in relation to the matter of the correspondence with the First Minister, the Lord Advocate and the Cabinet Secretary for Justice. The correspondence provided was the letter from the NFSP to the First Minister and sent 16th January 2024 (WITN00370141) and to which the NFSP received a response from the Lord Advocate on 11th March (WITN00370142). The NFSP also wrote to the Cabinet Secretary for Justice by email on 19th April 2024 to request a

meeting (WITN00370201). The NFSP provided the Inquiry with the letter it received from Head of Criminal Justice at the Scottish Government dated 14th May 2024 (WITN00370140). This letter was sent to the NFSP on behalf of both the Cabinet Secretary for Justice and the Lord Advocate. The letter of 14th May 2024 offered the prospect of meeting and asked that the NFSP respond to the letter after which the Private Offices would be in touch to arrange a meeting. The letter did not provide an email address to which the response should be sent. I can now advise the Inquiry that the NFSP, having received the letter of 14th May, subsequently sent three emails to the generic email address from which we had received that letter, and from which we had also received some of the earlier communications. Two of the three emails were sent on 15th and 24th May and made an offer regarding attendees and dates for a meeting. A follow-up email was sent on 12th July. We had not had a response to those emails by the date of my oral evidence on 26th September. A meeting with the Lord Advocate and/or the Cabinet Secretary had therefore not been arranged nor had one taken place by that date.

3. In the closing part of my oral evidence when I was being asked questions by the representatives of the Core Participants, I was asked by Ms Christie Allan of Livingstone Brown: *"Can you please elaborate on your attempts to meet with [the Scottish Justice Minister and the Lord Advocate]; when did you first contact them, what was the format of your communication; and have you been successful in receiving any kind of response?"* I replied, *"Well, we've received a response, which I think is within the core bundle*

and I can't remember the very specific details of it, but I think you'll have been able to read that. But as far as, you know, trying to get to the Lord Advocate and the Justice Minister of Scotland has proved difficult. I think they've obfuscated that down the line." (Transcript of Oral Evidence dated 26 September 2024, INQ000001187 at pages 148 – 149).

4. Following my oral testimony, there was a report within the Sunday Post newspaper on 29 September 2024 part of which referred to the proposal of a meeting between the Lord Advocate and the NFSP. Within the article there was a statement which had been issued by the Lord Advocate's office which indicated that the NFSP had not responded to an offer of a meeting made in a letter dated 14 May 2024. I was surprised by this as I knew the NFSP had responded by email offering dates and attendees for such a meeting.
5. As a result of all of this, we reviewed our correspondence regarding the meeting with the Lord Advocate and Scottish Justice Minister. The letter from the Head of Criminal Justice dated 14 May 2024 (WITN00370140) was sent from a generic email address. The letter offered a joint meeting with the Cabinet Secretary for Justice & Home Affairs and the Lord Advocate, and asked us, *"please respond to this letter and the Private Offices will be in touch to identify a suitable date and time."* The letter did not provide an alternative email address to respond to.
6. The NFSP sent three emails to the generic email address from which we had received this letter, seeking to arrange a meeting. These emails were

sent on 15th May 2024, 24th May 2024, and 12th July 2024 (WITN00370202, WITN00370203, and WITN00370204 respectively). It has now transpired that those emails to the generic email address from which we had received the letter did not reach either the offices of the Lord Advocate or the Cabinet Secretary for Justice and they were therefore not aware of them.

7. In light of these matters, the NFSP sent a letter to the Lord Advocate and Cabinet Secretary on 3 October 2024 (WITN00370205). We advised them of the emails dated 15 May 2024, 24 May 2024, and 12 July 2024 and confirming that, whilst we were unsure where these emails ultimately reached, the NFSP would still wish to meet with them.
8. The Lord Advocate responded on 21 October 2024, and I have provided this letter to the Inquiry (WITN00370206). It is hoped a meeting can be arranged in the near future.
9. In light of the above, I therefore wish to provide this additional information which directly relates to my answer to Ms Allan, in that it transpires that the emails the NFSP sent in response to the letter from the Head of Criminal Justice dated 14 May 2024 did not reach the offices of the Cabinet Secretary or the Lord Advocate, who were therefore not aware that we had responded. In turn, the NFSP were not aware about what had happened (or not happened) to our emails. I am therefore content that the part of my answer to Ms Allan where I said: *"I think they've obfuscated that down the line"* can be treated as withdrawn in light of the information now available to me. I trust this additional information to clarify this particular situation is of

assistance to the Inquiry.

Statement of Truth

I believe the content of this statement to be true.

Signed: _____

GRO

Dated: 6th November 2024

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| 6. | INQ000001187 | Transcript of Oral Evidence dated 26 September 2024 | INQ000001187 |
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