

Witness Name: Andy Furey

Statement No.: WITN00340100

Dated: 17th October 2024

POST OFFICE HORIZON IT INQUIRY

FIRST WITNESS STATEMENT OF ANDY FUREY

I, MR ANDY FUREY, will say as follows...

INTRODUCTION and BACKGROUND

1. I was employed by Post Office as a 16-year-old in 1978 as a Postal Officer (Counter Clerk) working in the Harrow Head Post Office area. This was my first full time job after leaving school.
2. From 2002 to date I have held the role of National Officer (Assistant Secretary) employed by the Communication Workers Union, with direct responsibility for the Union's members employed by Post Office. This includes members working in Crown Offices (now referred to by Post Office as Directly Managed Branches – DMBs), Supply Chain (Crew and Cash / Stock Processing Centres) and

Admin such as Call Centres, Finance and HR (including Payroll). I was first elected to this role and have held it on a continuous basis since 1st July 2002 and prior to this I performed the role from December 2001 on an Acting basis. The key responsibilities of being the Union's National Officer for our Post Office members primarily involves engagement and negotiation with Senior Post Office Directors in respect of Collective Bargaining on a wide range of issues, including:

- a. annual pay negotiations (including wider contractual terms & conditions)
- b. general Industrial Relations and strategic issues
- c. dealing with job losses and redundancies.

I also have oversight and direction of the Union's Representative structures within Post Office and I am accountable to the Union's Postal Executive and our Annual Conference.

3. I was elected to the Union of Communication Workers (UCW) Postal Group Management Committee in May 1993 and continued to be elected annually to the Union's Postal Executive subsequently known (from 25th January 1995) as the CWU until becoming a National Officer. Prior to holding National Office I held various Local roles (from 1984) and Regional roles (from 1987) with responsibility for Post Office members including:

- a. Section Secretary (Local), Harrow Amalgamated Branch
- b. Assistant District Organiser, London
- c. Regional Counters Representative, London
- d. Regional Counters Representative, North Thames / East Anglia.

All of the above roles had responsibility for UCW / CWU members working in Crown Post Offices, along with Administration members. As a Local / Regional Representative, my responsibilities would have included collective negotiations with Local / Regional management on all matters impacting on our members' jobs, including ways of working, changes to job location / job losses, and individual representation arising from discipline, attendance procedure and grievances.

4. 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 18th May 2024 (the "Request").

5. I have been asked to provide a first witness statement covering my involvement in matters relating to Phases 4, 5 and 6 of the Inquiry.

THE CWU'S ACTIVITIES AND THE NATURE OF MEMBERSHIP

6. The CWU is an independent trade union with over 170,000 members, certified as such by the statutory regulator, the Certification Officer. The CWU is the recognised Trade Union for non-managerial employee grades working for Post Office, amongst many other companies such as Royal Mail / Parcelforce, BT / Openreach, and Capita.

7. The Union's objectives as set out in the CWU's Rule Book are:
 - a) To unite and organise all those entitled to be members

- b) To protect and promote members' interests and maintain and improve their working lives.
8. The methods adopted by the CWU to represent our members' interests between 2000 and 2019 include (as they still do today) the following:
- a) Maintaining strong, democratic representative structures so that members are represented at every level from individual workplaces through their local Branch and Area / Regional Representatives, up to national level including the Postal Executive and via annual national conferences.
 - b) Legal advice and representation, including in Employment Tribunals, through the CWU's law firm UnionLine and other legal service providers.
 - c) Campaigning for and on behalf of our members and the wider trade union and Labour movement, including the TUC, both industrially and politically on a wide range of issues, from employment rights to health and safety related concerns.
 - d) Political engagement with MPs / Peers (including the All Party Parliamentary Group for Post Offices), Scottish MPs, Welsh Assembly Members, local authorities, Metro Mayors, the Labour Party and the Government on many areas of policy, including workers' rights and industrial matters, to ensure our members' interests are best represented at every level and in all circumstances relating to their employment including legislation.

**CWU LEGAL SERVICES (RULE 11.2.1 OF THE CWU RULE BOOK 2001 AND
RULE 4.1.7 OF THE CWU RULE BOOK 2004)**

9. Between 2000 and 2019, the CWU provided a broad range of legal services to our members as we do today.

10. In 2014, the CWU jointly set up trade union law firm UnionLine alongside the GMB in response to changes to the regulatory environment for the personal injury claims market. These changes were part of the Jackson reforms that came into force in April 2013. Prior to 2014, the CWU delivered legal services in conjunction with employment law firms such as Simpson Millar and others.

11. The creation of UnionLine changed the structure and organisation of much of CWU legal services, but the scope of the union's legal services offering has remained fundamentally the same since 2000. This includes legal advice and representation on:
 - a) Employment matters (both collective and individual) such as TUPE, unfair dismissal, working time and payment issues (such as unlawful deductions of wages)
 - b) Personal injury cases, helping individuals to win compensation if they suffer an accident or injury that wasn't their fault
 - c) Road Traffic Accidents (RTAs)

12. The CWU may, dependent on circumstances, offer legal advice on other issues, e.g. consumer disputes and motoring offences. However, we do not offer legal advice or support for criminal cases.

13. I have been asked to set out to what extent the rule changes in or around 2004 affected the legal representation to which CWU members may be entitled.

14. I can confirm that the rule changes in or around 2004 did not materially affect members' entitlement to legal services. The changes were designed to simplify and summarise the rule in relation to the provision of legal services.

15. I have been asked to provide an overview of the types of Post Office employees, worker or contractors that the CWU represented between 2000 and 2019 (inclusive), limited to those who used the Horizon IT system.

16. From 2000 to 2019, the CWU represented Post Office employees who used the Horizon IT system in a range of non-managerial grades working in Crown Post Offices. This includes:

- a. Counter Clerks (grade - Postal Officer – PO, then changed to Customer Service Consultant - CSC)
- b. Postal Officer with a monetary allowance for being a Product Specialist (Mails and Travel)
- c. former Financial Specialists (grade now obsolete)
- d. former Retail Assistants (for "Post Shops" – a public facing unit within a Crown Office) - grade now obsolete due to cessation of Post Shops within Crown Offices
- e. PO(A) grade (Postal Officer with a responsibility for supervisory support) – grade now obsolete

The CWU has also endeavoured to represent Postmasters from c.2011 (who would use the Horizon IT system) via the establishment of a dedicated National CWU Postmasters Branch.

17. Mark Baker, Branch Secretary has successfully intervened on behalf of individual Postmasters many times in respect of grievances. However, CWU has been held back in its effectiveness as Post Office has consistently refused to recognise the CWU as having bargaining and representative rights for Postmasters. Mark was the Branch Secretary until his retirement in 2023 and his primary role was to support individual Postmaster members. In doing so, he encountered massive resistance from managers to even acknowledge the CWU when supporting individual Postmasters. Indeed, Post Office management always insisted that he accompanied Postmasters as a “friend” and not as a CWU Representative. As a result of Post Office’s attitude towards the CWU and our Postmaster members, and our members’ desire to be represented by an independent trade union, the CWU represented Postmasters via a Group Employment Tribunal claim for “worker status”. The outcome in respect of 10 test cases (in March 2022) found in favour of Post Office and determined that Postmasters were self-employed agents of Post Office.

KNOWLEDGE OF HORIZON

18. I have been asked to consider the extent of my knowledge of the integrity of the Horizon IT system from 2000 to 2008 (inclusive), including a) the existence of bugs, errors or defects and b) the ability of Fujitsu staff to alter transaction data or data in Branch Accounts without the knowledge or consent of SPMs (“remote

access". In doing so, I have been asked to consider a range of documents provided by the Inquiry, including minutes of Horizon Working Group meetings and correspondence between the CWU and the Government.

19. I have also been asked to what extent did you discuss the matters set out in the paragraph above with others in the CWU.

20. I have also been asked to summarise any steps I or the CWU took to develop a better understanding of the matters between 2000 and 2008.

My personal knowledge of Horizon system integrity (2000-2008)

21. During this period, to the best of my knowledge, neither I, as the Union's National Officer, or the CWU had any insight or awareness of any material problems (BEDs) being reported by our members or Representatives regarding the integrity of the Horizon system.

22. In view of the fact there were no known challenges from either CWU members or Representatives in respect of the Horizon system integrity between 2000 and 2008, I have no reason to believe there would have been any discussions with others in the CWU on this matter.

23. Neither myself or the Union took any steps between 2000 and 2008 as we were unaware of any integrity issues with the Horizon system. There was no need to develop a better understanding of matters as there were no known problems flagged or escalated to the CWU HQs as far as I know.

**POST OFFICE INVESTIGATIONS, CRIMINAL PROSECUTIONS AND CIVIL
PROCEEDINGS**

Understanding of Post Office branch audits/investigations (2000-2008)

24. My long-established understanding of how Post Office traditionally undertook audits and investigations into alleged shortfalls in branch accounts (2000-2008) is as follows:

- a. Firstly, the audit team led by Managers (and including CWU members acting under the instruction of the managers), which were invariably called "The Checkers" by staff, were liable to turn up at Post Offices first thing in the morning (before the Post Office opened) unannounced and therefore would be a surprise to potentially the Manager of a Crown Office, and definitely the staff, or a Postmaster. Generally, these audits would take place on a Thursday morning, following the weekly balance the night before. Although special / emergency audits could take place on other occasions, particularly when they were instigated as a consequence of perceived concerns or suspicions surrounding the accuracy of Branch accounts and financial reporting of a particular Post Office. This information is likely to have arisen from the central finance teams based in Chesterfield.
- b. In respect of the mechanics of the actual audits, for Crown Offices, the Audit team would automatically check all of the tills, cash and stocks (stamps and value items such as Postal Orders) of the Counter staff, along with the main safe for the Branch Manager. A similar process would be adopted for Sub Post Offices. The audit would check against

the weekly Balance Sheets for individuals or against the cash declaration made the previous night. The same principle applied for the overall weekly cash account for the Crown Office.

- c. The perception of CWU members was that the Audit team's role in the main was designed to operate as a deterrent whereby Counter staff would be aware that an Audit team could descend on the workplace at any time. This in turn would help create the environment whereby staff would declare an accurate statement of accounts, even if this entailed showing a loss or a gain, and therefore refrain from any falsification of accounts. Whereas in practice, the Audit team visits in the main would be driven by information gleaned from the centre that gave cause for concern; hence the surprise visit.

25. I am not aware of any changes in practice during this period. Also, any investigations that may have led to disciplinary action, including dismissal, and ultimately criminal prosecutions would have been undertaken by the Post Office's Investigation Department, POID (who were all Managers and not members of the Audit Team). The Investigation Department was a separately run function, distinct from the Audit Team. In essence, the Audit Team would discover a discrepancy and if this was serious enough, it would warrant the POID being called in to instigate an investigation which invariably entailed interviewing the employee (for a Crown Office) or SubPostmaster.

26. If a significant loss had occurred at a Crown Office and was attributable to an individual stock, this may have led to an interview with the Investigation Team,

at which a CWU Representative was entitled to be present, if requested by the member. If theft was suspected, this position would lead to precautionary suspension from duty and subsequent disciplinary charges and potentially dismissal.

Mandatory Losses & Gains Policy in the Crown Office Network, Page 21

27. The Post Office mandatory Losses & Gains Policy in the Crown Office network of September 2008 (**POL00084075**) was a Post Office policy document rather than an actual Collective Agreement. However, it should be noted that pre-dating this document was the Branch Office Staffing Agreement (BOSA) reached in May 2001 (**CWU00000093**) which contained the following sections:

- section 10: Multi-User Till Working
- section 11 Single Till Working

28. These two sections of BOSA essentially amended the original Losses & Gains Postal Instruction of November 1983 (**CWU00000092**) to take account of new ways of working in respect of the introduction of multi-user tills and outdated financial numbers that hadn't risen with inflation.

29. In essence, the Post Office 2008 Document was part informed by the BOSA Agreement of 2001 in regard to multi user tills and the cash thresholds for Losses & Gains escalation process, which is commonly known amongst CWU Representatives and members as the stages for "3 losses in 3 months, 6 losses in 6 months, 9 losses in 9 months".

30. The CWU would have been provided with various earlier drafts of the 2008 Post Office policy document and would have sought to amend unsatisfactory language or direction if it was outwith our Collective Agreements. Whilst the CWU was not invited to formally agree the 2008 Post Office policy document, we would have had an input via the consultation referred to at the bottom of Page 3. Had we objected to any aspect of the policy document at the time, we would have written a letter / email outlining our rationale for the objection and articulating what we were seeking to change.

31. In 2008, the BOSAAgreement was updated and replaced with the Crown Office Staffing Agreement (COSA) (**CWU00000094**). Section 7 of this Agreement at Page 21 was Losses & Gains, with the escalation process contained at Annex F, Pages 34 and 35 for both multi-user stocks and individual stocks. The stages within Annex F are broadly consistent with the Post Office Policy Document 2008 at Pages 11 and 12 under the heading "Loss Escalation Process".

Support for Postmasters by CWU (2000 – 2008)

32. The National Federation of SubPostmasters (NFSP) was the only Union between 2000 - 2008 recognised by Post Office as the representative body for Postmasters. As such, the role of providing support for Postmasters was therefore the sole responsibility of the NFSP. It follows that there would have been no requirement for support to be offered by the CWU during this period.

33. The CWU did not organise or recruit within the Postmaster community between 2000 and 2008 and therefore was not required to provide any support for Postmasters. In simple terms, the Union did not recruit Postmasters into the CWU between 2000 and 2008 and as a consequence did not need or indeed seek to make any representations whatsoever on behalf of Postmasters.

34. Consequently, the CWU would not have been aware of or needed to raise any concerns about the Horizon IT or related training and support services for Postmasters. This position would also have equally applied for the conduct of Branch audits and investigations into alleged shortfalls in Branch accounts. This would have naturally been the role of the NFSP as the recognised Postmaster representative body.

35. Also, the CWU would not have been involved in any civil or criminal proceedings against Postmasters arising from alleged shortfalls in Branch accounts.

36. I have been asked to describe the nature and extent of any support the CWU offered to SPMs between 2000 and 2008 in relation to Horizon, branch audits and alleged shortfalls and civil and criminal proceedings.

37. For the reasons given above, the CWU did not provide support or representation for any Postmaster involved in Horizon cases between 2000 and 2008. Therefore, there is no knowledge to impart in respect of Postmasters who were accused of misconduct or incompetence in relation to a shortfall in a

Branch account. Similarly, this also applied to Postmasters who could not explain the cause of the shortfall or if they alleged it was caused by the Horizon IT system.

RESPONSE TO THE EMERGING SCANDAL

Personal awareness of JFSA and the Horizon IT problem raised by Computer Weekly in 2009

38. I am unable to say when I first became aware of the creation of the JFSA as the JFSA did not formally or informally reach out to the CWU at any point following its creation.

39. Whilst I cannot be certain, I assume the Computer Weekly article of 11th May 2009 (**POL00041564**) would have come to my attention at some point not long after publication due to it being a Post Office related article. That said, ordinarily Computer Weekly wouldn't have been a publication I was familiar with at the time. Furthermore, it is unlikely that the allegations made by Postmasters in the 2009 Computer Weekly article were on the CWU's radar in any meaningful way as the CWU did not represent Postmasters at that time and crucially there had been no reports of problems with Horizon from our Representatives or members working in Crown Offices.

Establishment of the CWU Postmasters Branch 2011

40. The CWU Postmasters Branch was formed around 2011 as a result of two main drivers:

- a. Dissatisfaction of Postmasters / NFSP members with the inability of the NFSP Executive / Leadership to improve Postmasters pay, and the constant support the NFSP Leadership gave to Post Office policies that were often perceived as detrimental to a Postmasters' livelihood.
- b. Network Transformation: This transformation programme commenced around 2010 as a voluntary exercise but some of the new models were not popular amongst many Postmasters, especially as the fixed element of Postmasters' pay (known as the Core Tier Payments) would be removed. Eventually, Post Office had to advise Government / BIS that the programme was not going to meet its target deadline date and the NT program was therefore made compulsory which would require further Government funding. The funding was approved and NT was made compulsory. This caused much upset amongst elements of the Postmaster community, especially as the only representative and recognised body for Postmasters, the NFSP, fully endorsed the programme going compulsory. It is my understanding that two Regions within the NFSP rebelled against this decision as they believed the NT programme would be bad for the Network and their livelihoods due to the remuneration changes. These two regions, led by their respective National Executive Officers Nippy Singh and Mark Baker, campaigned against this change.

I was told that, as this was seen by the Executive Council of the NFSP as going against NFSP Policy, Mr Singh was disciplined and thrown out of the NFSP and Mark Baker resigned in protest.

Following this, Mr Baker and Mr Singh, supported by their regional members approached the then CWU General Secretary Billy Hayes and the CWU Postmasters Branch was launched. As the National Officer with responsibility for Post Office members, I played a key part in welcoming them into the CWU and integrating them into my area of responsibility. Seemingly, the establishment of a CWU Postmasters Branch caused a degree of panic amongst the NFSP Leadership, along with Post Office, both of whom saw the prospect of a well organised independent alternative to the NFSP as a serious threat and a disruptor to the cosy relationship between the two organisations. It would be fair to say that a concerted effort was made to sully the reputation of the CWU with the aim of dissuading Postmasters from joining the Union. In this regard Post Office and the NFSP have been relatively successful as our membership has not grown significantly from the original base.

41. Although the CWU has struggled to achieve a major breakthrough in membership levels amongst Postmasters, since its launch, there have been a number of notable activities, for example:

- a. The CWU Postmasters Branch set up a closed Facebook group for Postmaster members, led by Mark Baker, so they could keep in touch, share experiences, ask questions and request assistance etc. as well as all the other CWU benefits available to its members. This Facebook group is very active and members are supportive of each other in sharing problems and solutions.

- b. Mark Baker was elected as Branch Secretary and he regularly travelled the length and breadth of the UK representing CWU members in meetings with Post Office management on individual contractual disputes as well as engaging and being involved with Government Officials and Committees. The Postmasters Branch represented its members, as part of the wider CWU, at Select Committees, All Parliamentary Party Group (APPG) on Post Offices, Post Office Advisory Group and for a period played a prominent role as part of the Post Bank Coalition. Mark Baker was also designated to sit on a Working Group established by Post Office to look into Mutualisation.
- c. When the Horizon Group litigation was being pursued, the CWU Postmasters Branch reached out to the JFSA and in particular with their managing solicitors Freeths. Mark Baker offered all the assistance Freeths requested as well as assisting members of the Press with their questions about Horizon and how Post Offices operated.
- d. Mark Baker attended many of the High Court hearings and I understand at one point he submitted a witness statement and was about to be sworn in to give verbal evidence but was not needed in the end.
- e. Mark Baker, on behalf of the Union (although not formally recognised by management) frequently challenged the Post Office and has represented CWU Postmasters over its treatment of individuals particularly since the Common Issues Judgment was handed down.
- f. We continue to press Nick Read, the current CEO for representational rights for Postmasters and for formal recognition in order to be able to engage in collective bargaining on behalf of Postmasters. However, the

CEO is proving fiercely resistant to the very idea and has continued to maintain the mantra that the NFSP is the only organisation recognised by Post Office for Postmaster matters. He has also pointed to the legally binding Grant Framework Agreement between Post Office and the NFSP which has recently been renewed and extended as a purported reason to exclude the intervention of an independent trade union.

CWU action to raise concerns about Horizon Integrity (2009 – 2019)

42. The earliest record of the CWU communicating with our Branches in relation to the potential Horizon IT problem and the role of the JFSA is the Letter to Branches (LTB 489/13) from myself of 12th July 2013 (**CWU00000001**). It is likely that awareness, following the Computer Weekly publications, gradually came to the CWU's attention.
43. The key reason for a slow burn of awareness and knowledge surrounding the Horizon system and the problems we know of today was the fact that CWU HQ didn't receive any escalation or reports from our Representative structures of specific or general concerns in relation to the Horizon system in Crown Post Offices. Furthermore, there had been no reported individual discipline cases, including dismissals, relating to discrepancies arising from Horizon, to myself as the Union's National Officer for Post Offices during this period. Indeed, during this timeframe, the Union, at National level, was completely unaware of any Horizon-related prosecutions by Post Office of our former members in Crown Offices. I understand the process of instigating prosecutions is a lengthy activity and transpires following the dismissal of the employee; hence the reference to "former member". It follows that overall, due to the lack of

involvement of Crown Office employees in the scandal (as far as we were aware), it was believed by my Representatives with responsibility for Crown Offices that Horizon problems was only an issue for Sub Post Offices and Postmasters / their staff. This was also my belief.

44. As a consequence of the above, aside from the developing scandal for Postmasters, to the best of my knowledge, we had no reason to and did not raise directly with Post Office, the Government, the Shareholder Executive / UKGI any major concerns regarding the integrity of the Horizon IT system on behalf of our members. This is due to the fact there was no reporting by the Union's Representatives of any Horizon-related concerns. Also, at that time we didn't have any specific discipline cases escalated to HQ that were identified as Horizon related from across our Crown Office membership.

45. In respect of MPs, we did submit, in January 2015, following discussions with Mark Baker, written evidence to the BIS Committee Inquiry on Horizon, when we stated: *"We believe there are serious failures with...Horizon and the infrastructure over which it runs. This includes problems with training, accounting practices, losses and gains policies, disciplinary policies, technical and operational help desk support, telecommunication and power related issues, interface development issues, hardware maintenance and data centre integrity."* (RLIT0000220)

46. On 3rd February 2015, Mark Baker and I gave oral evidence to the BIS Committee Inquiry on Horizon expressing serious concerns about the system

as well as Post Office's mediation scheme. During the session, Mark Baker said (**UKGI00003229**): *"What has been systemic and consistent throughout Horizon's life is the failure to recognise that parts of the infrastructure could be to blame for some of these discrepancies occurring."* Additionally, I stated *"We are concerned about the pace of the process of mediation, and the number of cases that seem to have fallen out of the process. Overall, we are not particularly happy with the way that the mediation scheme has been conducted."*

47. In April 2015, the CWU called for an independent inquiry into the Horizon debacle and justice for postmasters who claim they had been wrongfully accused of theft, false accounting etc. We also called on the Post Office to formally recognise the CWU to represent postmasters with immediate effect (**CWU00000004**), CWU letter to branches from myself, 21st April 2015). This reiterated the position we had advocated at the Select Committee.

48. Latterly, as an active invitee and member of the APPG for Post Offices, Mark Baker and I would have periodically participated in various discussions with MPs and Peers regarding the developing and ongoing Horizon scandal. Much of these discussions would have centred on raising the profile of the campaign with parliamentarians and the media, whilst developing a strategy of exposing the Post Office's attitude towards Horizon and Postmasters. These meetings are relatively informal and I'm unaware of any minutes being available. Suffice to say, generally speaking, the participants of the APPG have consistently been very concerned with the actions of Post Office in denying, up to and including

the Group Litigation Claim, any problems with Horizon. It should be noted, Lord Arbuthnot was an office holder of the APPG.

49. The CWU in April 2019 sent a parliamentary briefing to MPs (**CWU00000020**) to alert them to the outcome of the Post Office Horizon Trial known as the Common Issues Trial. The briefing contained a number of recommendations, including that Post Office's right to prosecute without CPS scrutiny needs to be assessed, that an investigation be undertaken into the appropriateness of using a public authority grant to fund the NFSP and an overhaul of Post Office's governance is needed.

50. In December 2019, the CWU reiterated its call for a public inquiry into the whole Horizon scandal (**CWU00000029**).

51. The CWU did not liaise or communicate with senior individuals at Post Office in respect of the integrity of the Horizon IT system for the following reasons:

- a. Firstly, to the best of my knowledge at the time, I was unaware of any CWU members working in Crown Offices who had been caught up in the scandal. Specifically, there had been no escalation by our Representatives of any discipline case to CWU HQ involving discrepancies through Horizon and crucially no correspondence from members raising concerns about Horizon.
- b. Secondly, the CWU was unaware of any CWU members from our Postmasters Branch who had been dismissed and / or prosecuted for

Horizon related matters. Had Mark Baker come across any case of this nature, he would have immediately brought it to my attention.

- c. Thirdly, the CWU would have expected the NFSP, as the recognised representative body for SubPostmasters, to have raised problems directly with Post Office in respect of its SubPostmaster members.

52. With regards to **POL00417089**, which is a Post Office internal briefing document in preparation for meeting with Lord Arbuthnot and specifically Page 6 which references the CWU. Firstly, it should be borne in mind the CWU was not a party to the meetings that Lord Arbuthnot was holding with Post Office in and around 2012 and therefore was not conversant with the specific cases under scrutiny or the strategy being adopted by Lord Arbuthnot in pursuing justice. Secondly, none of the cases Lord Arbuthnot was raising emanated from CWU or involved CWU members. Consistent with previous answers, the CWU had not experienced and was unaware at HQ level of any of our members being dismissed due to Horizon-related matters and subsequently prosecuted. The Post Office document suggests I had been “supportive” of the system to date. The document suggests that there would be an action from Kevin Gilliland to share the press position with me. I don’t believe this transpired and I certainly don’t recall ever, publicly or privately, saying I had been “supportive” of Horizon.

53. In respect of the internal Post Office emails at **POL00117004**, **POL00386319**, **POL00162290** regarding preparation for the BEIS Select Committee. I am bemused by much of the language and tone of these documents. My reasoning for this is that the CWU would always welcome the opportunity to present oral

evidence to a Select Committee on behalf of our members. This would definitely be the case if there were serious matters or concerns that we wished to draw to the attention of a Committee of MPs. I would expect Post Office to know and understand this.

54. Ordinarily, prior to giving oral evidence, we would provide a written submission in advance and this is what happened on this occasion (early 2015). The written evidence would accurately reflect the CWU's position and would invariably include recommendations from the Union which we would want the Committee to support or embrace. Also, our submission would help to inform questions to be put by MPs at the oral evidence session. We are therefore careful to ensure our accurate views are contained within our submissions.

Specifically turning to the comments made by Mark Davies and Tom Moran, I am unable to state they are accurate, although there is no reason why I wouldn't have given confirmation that I would be giving evidence to the Select Committee. Also, the CWU's position relating to the Crown Network was that at the time we believed that Horizon had no impact upon our members working in Crowns for the various reasons stated above. Similarly, there is no reason why I would have held back from saying this. It is also my recollection that Mark Baker was also concerned about problems / delays being encountered by a couple of our Postmaster members in regard to the Mediation scheme.

In regard to the comments from Tom Moran, I am at a loss to understand who he thinks I would be "on orders" from as the Union does not take instruction or orders from the Post Office or any of its managers. This may have been wishful thinking on Tom Moran's part. Equally, as an independent Trade Union, whose full endeavours are to represent members to the best of our abilities, our

primary objective would be to be “supportive” of our membership, including any Postmaster caught up in the Mediation scheme.

Appearance before Business, Innovation and Skills Select Committee, 3rd February 2015.

55. I confirm that the evidence I gave to the Select Committee was an accurate position of the knowledge and awareness I had of the issues at that time and as such I do not dispute the evidence given.

56. I can confirm Dave Ward, General Secretary, and I held a brief meeting with Baroness Neville-Rolfe on or around 5th August 2015 against the backdrop of there being a newly elected Conservative Government that replaced the Coalition Government. Given that Baroness Neville-Rolfe was a newly appointed Government Minister, we wanted to raise our key priorities surrounding the wider Post Office issues at that time, as contained within in Dave Ward’s letters to Baroness Neville-Rolfe of 15th June and 3rd July 2015, (**UKGI00005210, UKGI00005211**). The main issues in terms of our agenda related directly to the future viability of the Post Office network and our concern around its long-term sustainability and the ongoing long-term need for Government Funding. As a result of feedback from Mark Baker and our Postmaster members, we had particular concerns over Network Transformation along with the NFSP's Memorandum of Understanding with Post Office, which appeared to facilitate support by the NFSP for Network Transformation. I believe the meeting, which was time limited following introductions, focused mainly on these issues, all of which would have warranted significant discussion. My recollection is we ran out of time, which is often the case when

meeting with busy Ministers and I don't recall the Horizon IT system being discussed. We certainly wouldn't have had time beyond the issues within the General Secretary's letter to raise any other business.

Losses & Gains Joint Working Group

57. Our Representatives started to report in early 2018 a high degree of managerial activity surrounding the attempts to lay disciplinary charges on our Crown Office members as a consequence of Post Office instigating a policy decision to set aside the Losses & Gains Procedure. It should be noted the L&G Procedure was contractual and by operation of TUPE was a contractual term that formed part of our members' terms at the point of separation from Royal Mail. Management activities resulted in an increase in the use of the Discipline Procedure against our members in Crown Offices when incurring losses, instead of the agreed L&G Procedure. Seemingly, the action of Post Office management was designed to reduce the cost of losses across the Crown Office Network.

58. One particular case, which involved a member from Llandudno Crown, who was precautionary suspended for at least nine weeks due to balancing errors provoked me to write to Paula Vennells on 21st March 2018 (**WITN00340105**), challenging the ill-conceived actions of Post Office managers and seeking the return to work for the individual concerned and no disciplinary action being taken. Thankfully this case was resolved to our member's satisfaction and they did in fact return to normal duties.

59. As a consequence of the upsurge in the use of the Discipline Procedure, a Letter to Branches (no.200/18 dated 6th April 2018 – **WITN00340116**) was published advising Representatives of the inappropriate use of the Discipline Procedure for counter losses. The LTB outlined the Union's challenge to the actions of Post Office and the steps we planned to take to address this situation. It should be noted, at no point in this communication was there any reference to Horizon.

60. Following the publication of LTB 200/18, I wrote to John Whitefoot, Employee Relations & Policy Director on 16th April 2018 (**WITN00340102**) advising him of the terms of an Emergency Motion that had been submitted to be heard at the Union's Annual Conference the following week.

61. The Conference debate surrounding the Emergency Motion brought into sharp focus the concerns of our members in respect of the heightened use of the Discipline Procedure and the discarding of the Losses & Gains Procedure. The Motion included calling for an amnesty of any member who had been disciplined. The Motion below, which doesn't refer to Horizon, was unanimously endorsed following debate:

This Conference is deeply concerned by the contents of LTB 200/18, which was issued on 6th April 2018. In particular, the abuse of the Conduct Code in the Post Office, and the breach of the Losses and Gains Procedure, as outlined in the Crown Office Staffing Agreement are issues that Conference believes cannot be tolerated. Whilst Conference accepts that there may be elements of the agreements that could be updated,

Conference believes that this should happen by negotiation and agreement, and not by allowing breaches of these existing agreements that have served our members well for many years.

Therefore, Conference instructs the Postal Executive that it takes steps to ensure that:

1. The Post Office reaffirms its commitment to, and abides by the Nationally Agreed procedures in the Conduct Code and the Losses and Gains Procedure until such time as they are renegotiated and any replacement or amended version is agreed.

2. The £30 trigger contained in the Losses and Gains Procedure be updated to take into account inflation since the level was set in 2001.

3. There is an amnesty for any disciplinary penalties that members have already received through this abuse of the Conduct Code, so they are expunged from their records.

Glasgow and District Amal

Plymouth and East Cornwall Amal

62. Following the carriage of the Emergency Motion, I instigated further correspondence to John Whitefoot, dated 4th May 2018 (**WITN00340103**) and took measures to provide our members (via two emails dated 4th and 14th May 2018 to my Representatives – **WITN00340104** and **WITN00340106**), when facing disciplinary hearings, with five model letters (**WITN00340110**, **WITN00340111**, **WITN00340112**, **WITN00340113**, **WITN00340114**) designed to object to the actions of management and the ignoring of the Losses & Gains Procedure.

63. Following my letter to John Whitefoot of 4th May, a response was received from Lee Kelly, Senior Employee Relations Manager dated 12th June 2018 (**WITN00340108**). This letter went some way towards satisfying the terms of the Emergency Motion and I viewed this as good progress. In particular, Lee Kelly confirmed that the Conduct Code (Discipline Procedure) “*would only be used in circumstances relating to Losses and Gains where there is a reasonable suspicion of theft, dishonesty, or false accounting*”. Lee Kelly also confirmed that Post Office would follow the described escalation process as per the Losses & Gains Procedure in all other circumstances.

64. A further LTB was published (LTB 368/18 – **WITN00340117**) was published to our Branches and Representatives on 26th June 2018 confirming the progress made, described above.

65. Throughout the summer, further talks took place at a National level with the aim of negotiating a revised Losses & Gains Procedure as well as delivering in full the terms of the Conference Motion. We established a Joint Working Group to undertake this activity. However, this failed to get off the ground properly, not least due to disagreements around the wording of the draft Terms of Reference. In essence, on a positive note, the pressure put on management arising from the Emergency Motion and our actions in respect of the five model letters had the desired effect and along with a change in management in both the Industrial Relations teams and the Senior Management of the Crown Network, matters settled down considerably. Accordingly, to all intents and purposes, although

we did not achieve the amnesty the Motion called for, the Union achieved its aims of management ceasing to use the Discipline Procedure rather than the Losses & Gains Procedure. In respect of the amnesty, the vast majority of warnings were of a year's duration and with the passage of time most of these were due to expire anyway.

66. Prior to the Panorama documentary of August 2015, the Union issued a press release (**POL00152928**) condemning the behaviours of Senior Post Office Directors towards Postmasters, resulting from Horizon. The Union also issued a Letter to Branches (**CWU00000013**) highlighting the forthcoming Panorama programme and Parliamentary activity including a Question raised at PMQs on 1st July 2015.

67. Following the Panorama programme, we published a further LTB (534/15 – **WITN00340115**) on 18th August 2015 in which we reiterated our criticism of Post Office and once again called for a full judicial Inquiry. Our strong view at the time was that there needed to be a political solution to the Horizon scandal and to bring about justice for Postmasters. As a consequence, I felt that any engagement with Post Office would be fruitless as Post Office was still in denial about system bugs, errors and defects. Additionally, as far as we knew, at this juncture, there weren't any CWU Postmaster members subjected to disciplinary measures, including dismissal and prosecution. Therefore, to the best of my recollection, there wasn't any communication between CWU and Post Office on this matter.

68. The CWU did not have any involvement in claims submitted by SubPostmasters represented by Shoosmiths in 2011 as we had no Postmasters members involved in the Horizon scandal at the time. Similarly, as we had no Postmaster members prosecuted, the CWU was not involved in representing any SubPostmasters convicted of theft, fraud offences or false accounting to overturn convictions.

69. In respect of the initial Complaint Review and Mediation Scheme, my understanding is that Mark Baker, Postmasters Branch Secretary was involved at that time to the extent of supporting one member who actually went to a Mediation hearing. I personally didn't have any involvement in this matter.

70. The CWU was not directly involved in the Group Litigation Order proceedings – Bates & Others vs POL, although I'm given to understand that Mark Baker offered to support the claimants by submitting a witness statement and was prepared to give evidence. Ultimately, this wasn't necessary. The CWU was of course principally publicly and politically supportive of the JFSA's ambitions in seeking to secure justice for the Horizon victims.

71. The CWU did not have any liaison or communication with either the NFSP or the JFSA in relation to the integrity of Horizon as far as I am aware. To the best of my knowledge, neither the NFSP or JFSA contacted CWU to discuss Horizon. In regard to the NFSP, this is hardly a surprise as they remained steadfastly in support of the "robust" system up to and including the GLO. Also,

the JFSA did not contact CWU to seek our support for or involvement in their GLO.

72. It is fair to say that following the decision by the CWU to recruit Postmasters into our organisation, that we do not have a "relationship" with the NFSP. This position didn't change following the NFSP's conversion to the status of Trade Association from Trade Union in 2014, following a decision of the Certification Officer that the NFSP did not satisfy the definition of the trade union.

73. Our long-held view is that the NFSP merely performs the role of cheerleader for Post Office and that the grant funding agreement is wholly inappropriate, unhealthy and essentially props up the NFSP, to the detriment of the SubPostmasters' interests. From the CWU's perspective, a strong indication of the loyal support the NFSP gives to Post Office was seen when the NFSP actively opposed the CWU's claim for Postmasters to gain Worker status. Obviously the NFSP was hostile to a CWU successful claim as this could have been the precursor to securing a recognition agreement whereby the CWU would be able to collectively bargain for Postmasters.

74. The reality is, the CWU, as an independent Trade Union, generally has a different perspective and policies on Post Office matters to the NFSP. There are obviously areas where we would be aligned, such as protecting the long-term viability of the service to customers and the need for gaining new work and revenue. However, our Postmaster members feel very strongly that the NFSP let Postmasters down badly in respect of Network Transformation and

wider remuneration matters and of course we now know that their support for the Horizon system was unstinting up until at least the GLO proceedings. This position is an anathema to the CWU and our members who are not slow in challenging and criticising Post Office Leadership when it is treating them badly.

Whistleblowing

75. Our members employed by Post Office and Postmasters are able to raise matters of concern directly with our Representative structures, which included Representatives at Area and Regional (now Territorial) levels and the Postmasters Branch Secretary. This organisation and CWU structure enables matters of concern to be escalated through its Branches up to and including National level.

76. Our members' voices are of paramount importance to the Union, particularly in the establishment of our policies. Accordingly, there are various regular forums where Representatives meet with the CWU National leadership. These include National Briefings, Senior Field Officials Briefings and Annual Conferences. Also, our members are able to email or write to CWU HQ complaining of matters relating to their day to day working lives, although they are encouraged to initially raise matters via their Representative and Branch structures. We have also, for many years had in place a members only closed Facebook group for directly employed staff and members are encouraged to raise matters of concerns via this platform. In parallel to this, we also run a dedicated close Postmasters Facebook group.

77. Whilst the CWU does not have a specific whistleblowing policy for members to raise allegations about their treatment in the workplace, as a result of our extensive network of Representatives, many of whom are very experienced, I am confident that any major area of concern would quickly find its way to myself as the National Officer. In essence, our members are very vocal and do not hesitate to complain about Post Office procedures, policies and actions if they think management are behaving inappropriately. Basically, we have a very active membership, this is demonstrated by the fact that it has on numerous occasions taken strike action when in conflict with Post Office.

78. Similarly, Mark Baker our Postmasters Branch Secretary was well known to all Postmaster members and his contact details have been regularly shared when communicating with members. Additionally, Mark was the main administrator for our dedicated closed Postmasters facebook group which is very active in discussing all matters relating to the wellbeing of Postmasters. Mark, due to his extensive knowledge and commitment, even to this day, is a frequent poster on this group and still regularly provides advice and guidance and support whenever necessary and has performed this role since the establishment of our Postmasters Branch. Sean Hudson, our new Branch Secretary, has quickly taken up the mantle and is passionate about providing decent and independent representation for Postmasters.

General

79. My strong personal view is that SubPostmasters collectively (not just those that were unjustly prosecuted and convicted) have been severely let down by both Post Office and the NFSP and this happened over a significant period of time.

Therefore, the simple answer is that adequate support and representation available to SubPostmasters caught up in the scandal was completely non-existent and support only materialised once the JFSA was established and the resultant political pressures started to grow. There were, however, in my opinion, a number of major factors that contributed to this position. For example:

- a. There was, amongst the Senior Leadership of Post Office, an institutionalised attitude that every SubPostmaster who had an accounting discrepancy was guilty of theft. The inappropriate methods of investigating by the POID meant that the onus was on SubPostmasters to prove their innocence, which in my opinion clearly conflicts with natural justice. These attitudes permeated down from the top management to even the junior levels of management.
- b. Post Office was obsessed with its wider reputation and branding and as a consequence, Senior Directors / management couldn't in any way accept that the Horizon system was flawed, even when all indications pointed to this. It follows that the mantra the NFSP readily bought into was that the Horizon system was robust and as a consequence they didn't support any SubPostmaster that was caught up in the scandal.
- c. In my opinion, a high degree of the toxic culture that was prevalent at Senior levels of management was driven by a pay at risk model for Directors and Senior Managers whereby the potential to receive LTIP and STIP bonuses incentivised the wrong behaviours and actions as individuals were motivated by self-benefit. The CWU believed that this toxic culture at the top of Post Office was primarily driven by Government targets linked to various bonus schemes and payments. Overall, the

combined mentality of being in denial of any bugs, errors and defects in the Horizon system and bonus-driven targets evidently led to significant levels of managerial tiers believing that many Postmasters were dishonest in their accounting. This culture was aided and abetted by the NFSP who the CWU has reasonable grounds to believe betrayed their members as they readily accepted Post Office management's mantra of Horizon being robust over the experiences and views of many SubPostmasters who had turned to them for help. Additionally, the more recent funding of the NFSP by Post Office evidently creates a conflict of interest, whereby the NFSP has been shown to put its commercial self-interest, along with the interests of Post Office ahead of its own members.

80. In closing, the main issues I wish to make the Chair, Sir Wyn Williams aware of are as follows:

81. The CWU, as a recognised and independent Trade Union, has robust Representative structures and long-established good protections and safeguards in place which have been negotiated for our directly employed Post Office members. It is my strongly held belief that the combination of these two key fundamentals has contributed greatly to the job protection for many of our members who might otherwise have been victims of the Horizon scandal. I fervently believe the CWU's policies, allied to its determination to ensure protection of employment for members wherever possible has enabled the Union to provide the strongest possible representation on behalf of our directly

employed members. Accordingly, I am not aware of any case in which the CWU has failed to support a member who has requested help in relation to Horizon.

82. Furthermore, since the Horizon system was introduced, no CWU member or former member has come forward to CWU HQ to say they were denied / refused representation or support. Similarly, to the best of my knowledge, nobody has claimed they felt let down by the CWU. Indeed, if there was any former CWU member who needed support and representation, due to being a victim of Horizon, we would have expected them to have come forward by now and definitely after the widespread national news coverage and publicity due to the ITV Drama – Mr Bates vs Post Office. The fact remains that no former CWU member has raised any concerns or complaint in respect of CWU representation at Post Office disciplinary hearings, including Appeals specifically in relation to accounting problems associated with Horizon.

83. Prior to the commencement of the Inquiry, the CWU wasn't aware and therefore had no details (names / workplaces) of any of our directly employed members being dismissed and subsequently prosecuted due to problems with Horizon. This position is consistent with the oral evidence I gave at the Select Committee in February 2015.

84. We are now aware from evidence given to the Inquiry by Andrew Wise on 20th September 2023 of the dismissal of Elena Herd who was a Counter Clerk and CWU member (our records show that Elena was a member between 2009 and

2011) at Stockport Crown Post Office. We understand Elena was convicted of fraud following a POID investigation into the use of rejected postage labels. We were pleased to find out that Elena's fraud conviction was overturned by the CCRC in November 2022 due to the conviction being unsafe because it relied on data from Horizon. We do not have any record of Elena having contacted a Local / Area CWU Representative for support in relation to her discipline case. It is however, possible that she did in fact receive support in her disciplinary hearing and appeal from CWU, although we have checked with our Representatives from the Greater Manchester area and nobody currently in post or retired has any recollection of being involved in Elena's case.

85. Tracy Felstead is the only other case I am now aware of in respect of a Post Office employee being convicted as a consequence of the Horizon scandal. The CWU has no record of Tracy having been a CWU member. I do not recall when I heard about Tracy's case (it would have been as part of the publicity gained due to the campaigning by the JFSA and the political scrutiny). By March 2020 the CWU was obviously aware of Tracy's conviction as she gave oral evidence to the BEIS Committee on the same day as me. Additionally, we have no knowledge of Tracy approaching CWU for support at the time of her employment when facing dismissal or at any time since.

86. CWU members and Post Office have experienced a high degree of conflict since 2007 in the main surrounding pay disputes and the future of the Crown Office Network. The following ballot results were declared and, in most cases, significant levels of strike action followed:

- a. **2007** - Future of Network and Pay - 2,740 Yes votes – 73%, 993 No votes, - . Turnout 74%.
- b. **2011** – Crown Office Pay. Yes votes 2,365 – 93%. No votes 172 – 7%. Turnout 66%. Resolved with a two-year pay deal without having to resort to strike action.
- c. **2013** - Pay and the Future of the Crown Office Network. Yes votes – 2,367 – 88.1%. No votes 321 – 11.9%. Turnout 74.7%
- d. **2014** – Pay. Yes votes 664 – 75.9%. No votes 211 – 24.1%. Turnout 62%.
- e. **2016** – Future of the Post Office, Job Security and Pensions dispute. Yes votes 1,459 – 83.2%. No votes 295 – 16.8%. Turnout 50.3%.
- f. **2022** – Pay. Yes votes 923 – 97.3%. No votes 26 – 2.7%. Turnout 70.2%.
- g. Further ballot in **November 2022** due to the expiry of the previous ballot, the life of which was only six months. Yes votes 802 – 91.24%. No votes 77 – 8.76%. Turnout 65.2%.

The ballots above were the main national disputes; however, there would have been other ballots of certain grade groups or functions / areas in respect of various trade disputes applicable to ways of working etc.

87. Whilst none of these ballots were in respect of Horizon, it does nonetheless demonstrate that the CWU and its members have been in regular conflict with Post Office during the tenures of Alan Cook, Paula Vennells and Nick Read. In the main, negotiated settlements were ultimately secured, with our members voting to support the outcome.

88. Clearly, the CWU has engaged with its membership on many occasions to seek legal mandates for industrial action. This position proves the CWU is independent of Post Office. We have never taken these steps lightly and have always believed that the confrontational attitude of Post Office Senior Leadership has centred around provocation which has led to our members taking action when they believed it necessary.

89. The CWU also, due to the overall strategic direction of the Board in respect of our members' job security, pay and the future of the Post Office, conducted an individual members' survey whereby we posed eight critical questions including the following key question "***Do you support a vote of No Confidence in the leadership of Paula Vennells, Chief Executive and the Post Office Board?***". I wrote to Paula Vennells on 16th March 2017 (WITN00340109) advising her of the decision to conduct the survey. I also provided her with a copy of LTB 160/17 also dated 16th March 2017.

The survey closed on 31st March 2017 and 910 members responded with a Yes to the No Confidence question, equating to 92% of voters. 74 (8%) voted No. The membership communication in respect of this activity is at WITN00340118. I also wrote again on 31st March to Paula Vennells (WITN00340101) to inform her of the survey results.

90. Finally, as early as 2015, CWU has campaigned politically for an Independent judicial Inquiry in order that Postmaster victims could receive justice and crucially Post Office and its senior leadership be held to account. We were obviously very pleased when the then Government agreed to give the Inquiry

statutory status. Consequently, the CWU fully supports the current Inquiry and wishes to assist with its investigations.

Statement of Truth

I believe the content of this statement to be true.

Signed: **GRO** _____

Dated: _____ 17th October 2024 __

Index to First Witness Statement of Andy Furey

No.	URN	Document Description	Control Number
1	POL00084075	Mandatory Losses & Gains Policy in the Crown Office Network	POL-0081133
2	CWU00000093	0:00 Agreement between Post Office Network and the Communication Workers Union for Staff Contractual Terms and Conditions, and for Resourcing and Staffing of Branch Offices	CWU00000093
3	CWU00000092	Post Office postal instructions re: pay and conditions and counter losses and gains policy	CWU00000092
4	CWU00000094	Agreement between CWU and the Post Office re: Crown Office Staffing Agreement on Staff Contractual Terms and Conditions, Resourcing and Staffing of Crown Offices	CWU00000094
5	POL00041564	Bankruptcy, prosecution and disrupted livelihoods - Postmasters tell their story; reported by Rebecca Thomson - Article	POL-0038046
6	CWU00000001	CWU letter to all branches with	VIS00007675

		postal members, Post Office: Findings of Second Sight report into Horizon computer system, from Andy Furey, CWU Assistant Secretary, dated 12 th July 2013	
7	RLIT0000220	Written evidence submitted by CWU (POM 12)	RLIT0000220
8	UKGI00003229	Business, Innovation and Skills Committee, Oral evidence Transcript: Post Office Mediation, HC 935	UKGI014043-001
9	CWU00000004	CWU letter to branches from Andy Furey, CWU Assistant Secretary, dated 21 st April 2015	VIS00007678
10	CWU00000020	CWU letter to branches from Andy Furey, dated 12 th April 2019	VIS00007694
11	CWU00000029	CWU letter to branches from Andy Furey dated 23 rd December 2019	VIS00007703
12	POL00417089	Email from Mike Whitehead to Peter Batten, RE: Will Gibson Meeting - Feedback/actions attaching Arbuthnot meetings communication plan.	POL-BSFF- 0237240
13	POL00117004	Email to Mark R Davies from Thomas P Moran Re: Select	POL-0117839

		Committee: initial briefing material and other actions	
14	POL00386319	Email from Mark Davies to Jane Hill re Select Committee initial briefing material	POL-BSFF-0213206
15	POL00162290	Email from Thomas P Moran to Mark R Davies and Jane Hill RE: Notes from Andy Furey conversation re Horizon	POL-0150724
16	UKGI00005210	Letter from Dave Ward, CWU General Secretary, to Baroness Neville-Rolfe, Minister for Business, Innovation and Skills, dated 15 th June 2015	UKGI016024-001
17	UKGI00005211	Letter from Dave Ward, CWU General Secretary, to Baroness Neville-Rolfe, Minister for Business, Innovation and Skills, dated 3rd July 2015	UKGI016025-001
18	WITN00340105	Letter sent to Paula Vennells by Andy Furey (CWU) Re: Llandudno Crown – precautionary suspension	WITN00340105
19	WITN00340116	CWU Letter to Branches Re: Post Office Inappropriate Use of the Discipline	WITN00340116

		Procedure for Counter Losses	
20	WITN00340102	Letter to John Whitefoot (Employee Relations & Policy Director at POL), from Andy Furey (CWU) Re: Collective Agreement for losses & gains – Emergency Motion: Inappropriate use of Discipline	WITN00340102
21	WITN00340103	Letter to John Whitefoot (Employee Relations & Policy Director at POL), from Andy Furey (CWU) Re: Collective Agreement for losses & gains – Emergency Motion Carried	WITN00340103
22	WITN00340104	Email from Lorna Pearson (CWU) to Christopher Roche (POL); David Bowmaker (POL) and others Re: Losses & Gains – Letter to John Whitefoot – update & model letters	WITN00340104
23	WITN00340106	Email from Andy Furey (CWU) to Christopher Roche (POL); David Bowmaker (POL) and others Re: Losses & Gains – Model Letters – Final Versions	WITN00340106
24	WITN00340110	CWU Letter Template Re:	WITN00340110

		Invitation to Fact Finding Interview	
25	WITN00340111	CWU Letter Template Re: Invitation to Conduct Code Interview	WITN00340111
26	WITN00340112	CWU template letter Re: Issuing of Penalty / Disciplinary Action concerning use of the Conduct Code	WITN00340112
27	WITN00340113	CWU letter template – addressed to 2 nd line manager Re: Invitation to Appeal Hearing	WITN00340113
28	WITN00340114	CWU Template Letter to 2 nd line manager Re: Outcome of Appeal	WITN00340114
29	WITN00340108	Letter addressed to Andy Furey (CWU) from Lee Kelly (POL) Re: Collective Agreement for Losses & Gains – Emergency Motion Carried	WITN00340108
30	WITN00340117	CWU Letter to Branches Re: Post Office and inappropriate use of the discipline procedure for counter losses – emergency motion E1	WITN0034117
31	POL00152928	00:00 Email chain from Martine Munby to Melanie Corfield, Ruth Barker and Mark Davies cc'ing others RE: FW:	POL-BSFF0012040

		Post Office - Monitoring Trouble at the Post Office	
32	CWU00000013	Letter: CWU letter to all branches No. 533/15 with postal members re:'Post Office: Panorama Programme on Horizon Issues"	VIS00007687
33	WITN00340115	CWU Letter to Branches Re: Panorama Broadcast – "Trouble at the Post Office"	POL-BSFF- 0012040
34	WITN00340109	Letter addressed to Mrs Paula Vennells (POL), from Andy Furey (CWU) Re: CWU Members Survey – an opportunity for the Members voices to be heard	VIS00007687
35	WITN00340118	CWU publication "Pay 2017 and the Future of the Post Office"	WITN00340118
36	WITN00340101	Letter to Paula Vennells from Andy Furey (CWU) Re: CWU Members Survey results	WITN00340101