

Witness Name: Jane Hill

Statement No: 1

Dated: 24.10.24

Ref: WITN10680100

POST OFFICE HORIZON IT INQUIRY

FIRST WITNESS STATEMENT OF JANE HILL

I, Jane Hill, will say as follows:

1. I make this statement following a request for information pursuant to Rule 9 of the Inquiry Rules 2006, dated 25 September 2024. Before I begin, I would like to take this opportunity to extend my deepest sympathies to every individual who suffered due to the faults in the Horizon system and the treatment that they subsequently received from the Post Office. I hope that my evidence goes some way to giving these individuals closure and assisting in preventing an event such as this ever happening again.
2. I can confirm that I have had the legal assistance of Ashfords LLP in drafting this statement.

BACKGROUND

3. I graduated from Sussex University in 1992 with a degree in Geography. After graduation I held various jobs before I eventually found my place working as an assistant to a Member of Parliament (MP), Sir Richard Ottaway in 1996. I worked for him until 2000 at which point I took a break to study for a Masters in Interactive Multi-Media at Westminster University. I returned to work in the House of Commons from 2002 – 2005 after which I joined M&S as a Government Affairs Officer from 2005 – 2008. I then became Head of Public Affairs at ITV from 2008 – 2013 before joining Post Office Limited ('POL') as Head of Public Affairs on 9 September 2013.

4. I originally held the job at POL full time, but dropped down to 4 days a week in May 2014. I then went on maternity leave from October 2017 – October 2018, during which time my job title changed to Director of Public Affairs (2018). Although my job title changed, my role did not. In 2019 I gained a place to study Organisational Psychology at Birkbeck College (part of the University of London) but unfortunately due to health issues I was not able to pursue my studies and I went on long term sick leave from July 2019 before eventually leaving POL in 2020. I reported to Mark Davies throughout my time at POL. Although Richard Taylor was technically my line manager when Mark left in 2019, I was not working at this time and so in practical terms, never reported to him.

5. My primary role was to manage POL's relationship with Parliament - to promote the business as well as protect its reputation. My role also involved building

relationships with other stakeholder organisations, such as rural, disability, retail and other groups who had an interest in POL outside the political sphere.

6. The promotional side of my role included helping raise awareness among parliamentarians and other stakeholders of POL's strategy following separation from Royal Mail as many would get confused between the two or did not know that POL was now a standalone organisation. POL's strategy at that time was to change the way many post office branches operated. This always attracted local interest and sometimes concern, and my job was to ensure parliamentarians understood the rationale and context for the changes we were making. I would seek opportunities to brief MPs either reactively, in response to concerns raised, or proactively, often around parliamentary business. I would also organise events in Parliament or at party conferences and use these as briefing opportunities. The role also entailed supporting senior colleagues' engagement with political audiences.
7. I led a team of regional public affairs managers, whose primary role was to communicate changes to Post Office branches to local MPs and councillors and to manage any concerns that arose. We would ensure that Post Office colleagues were aware of any serious local concerns to planned changes and, on occasion, seek to influence these plans where we thought that the full local impact had not been fully considered by the business.
8. I also helped to put together submissions and briefings for relevant Select Committee Inquiries.
9. A separate but key role was establishing and managing the development of the Post Office Advisory Council which I have described in further detail below.

10. In terms of my team, I originally started off with a team of 5. After a restructure this rose to 12 but around spring 2014, this roughly halved following a round of redundancies and a further restructure. Initially one of my team members, Sophie Bialaszewski, was responsible for communications planning around Horizon, alongside her public affairs role, although she reported to the Communications Director for this part of her role. She left in Summer 2014 after which the Horizon communications planning aspect of her role was moved to the press office. I can also recall that initially the regional public affairs managers reported to another colleague but after a short period they were moved to my team so that public affairs activity sat in one place.

11. The Inquiry have asked how, when, and in what circumstances I became aware of complaints about the Horizon system. I was aware of the complaints at the interview process because I had researched POL prior to my job interview and read about the complaints online. I imagine this would have come up in my interview but I can't remember exactly. I can recall having conversations about Horizon with colleagues when I started the role, as part of my getting to know the business. As referenced above, for my first six months at the Post Office Sophie Bialaszewski was responsible for communications planning around Horizon and so most of these conversations would have been with her. I do not recall having any formal briefing from POL on complaints regarding Horizon.

12. There were communications from MPs about Horizon and the mediation scheme. However there were tight controls around all communication, internal and external, on this subject and so if I received such a communication I would have asked a colleague in the press team for their input, as they held the pen on everything to do with Horizon. My role never involved directly dealing with

SPM complaints. The closest I would have got is an MP writing to me to say that a SPM in their constituency had complained about Horizon.

13. **POL00110047** outlines the Post Office Communications Plan 2015/16. I have been asked about my involvement in setting the communications strategy for Horizon. Horizon was one area where I had no direct involvement in setting the communications strategy. Instead the strategy was set by the Communications Director and Press Team, with input from Legal, Network and IT. My involvement was to act as a communication channel for the messaging that had already been written as my role in relation to Horizon was to help deliver the strategy, not to create it. So I would become involved after the communications strategy for Horizon was set, and only if communication with parliamentarians was required.

14. My working relationship with Mark Davies was generally good although he sometimes struggled to have the more difficult conversations. However, he was a compassionate leader with a huge amount of empathy.

15. The Inquiry have asked me to describe my involvement with ShEx and UKGI during my career. I did not have any day to day involvement with them. Their primary contacts in the Communications team were the Head of Policy and Briefing / Director of Government and the Communications Director.

16. From memory, my involvement and interaction with ShEx/UKGI occurred for the most part when the Post Office was on the Parliamentary agenda, particularly when the Minister was required to respond - for example when the Minister was required to speak or answer questions about POL in the Commons. On these occasions I would let ShEx/UKGI know who we had briefed and share our

materials. I can also recall working with a representative of ShEx / UKGI to assist with their inter-departmental response to a piece of legislation which sought to cap public sector redundancy pay. My role was to provide information on how the draft legislation would effect POL if implemented. Effectively I was the provider of information.

RELATIONSHIP WITH MEMBERS OF PARLIAMENT (MPs)

17. In answering the Inquiry's questions on this subject matter I have reviewed the following documents, which I have explained below:

- a. **POL00200475** is a detailed briefing for an Industry in Parliament Trust dinner on 12 February 2014 at which Paula Vennells was speaking. This is a good example of how I would support senior colleagues as they engaged with parliamentarians. This document is a briefing for her to read ahead of an event which provides her with information about the event, attendees and issues that might be raised.
- b. **POL00101766** is an email sent from me with information for colleagues ahead of an MP drop-in event on 10 December 2014. I set up events such as these to help increase MPs' awareness and engagement with POL. We would book a room in parliament, select a topical theme and invite all MPs and some peers to attend. At these events parliamentarians could talk to POL colleagues about our strategy, ask questions and raise any concerns they had – usually about changes to post office branches in their constituency. My aim was to help facilitate an understanding of POL's strategy post separation.

- c. **POL00162224** is an email from me to Angela Van-Den Bogerd, in advance of the MP drop-in event on 10th December 2014, requesting her attendance and asking for some additional information for a briefing. Angela had good knowledge about SPMs and how they used Horizon and so I asked if she was able to attend and answer questions after seeing that two MPs, James Arbuthnot (now Lord Arbuthnot) and Andrew Bridgen, said they would be attending as both MPs had been vocal on Horizon. Unfortunately, in this case she was unable to attend due to it being a last minute invitation but she provided information for us to take to the event in case the issue was raised. From memory neither James Arbuthnot nor Andrew Bridgen attended.
- d. **POL00158072** is a Post Office weekly Briefing pack dated 27 September 2013. As noted in the document, it was produced by the Communications team. It is relevant to me in that page 11 of the document gives a summary of our weekly political activity and events which we have taken part in and which I would have been involved in arranging.
- e. **POL00162071** is an email chain from September 2013, which would have been in the first few weeks of me starting at POL. A member of the press team has circulated draft responses to BBC Wales' questions about Horizon. It is suggested that the story relates to a SPM in the constituency of the then Welsh Secretary, David Jones MP. At the time, Sophie Bialaszewski dealt with the planning on Project Sparrow and so I think it would have been sent to her for information and she

would have forwarded it to me. I am new in the role, and keen to try and impress my new boss, and offer to try speak to David Jones. I may have tried calling his office but I cannot recall ever meeting with him.

- f. **UKGI00004680** is an email from Mel Corfield, who sat in the press team. She has forwarded me two Freedom of Information responses to the BBC in respect of prosecutions. I forwarded these to the Shareholder Executive. From reading the subsequent email (**UKGI00004692**), I think that the information was requested for a briefing. It was common for me to act as a communications channel in this way, essentially acting as a line of communication to forward on information as and when needed.
- g. **UKGI00023280** is an example of where I would be copied into an email for information but not needed to take any action. Here, Alice Cookson is making individuals aware of an NFSP press release saying that *"Post Office network has 'been taken beyond a tipping point' and its future viability is now in doubt..."* Recipients include a representative from UKGI and the subsequent trail is a discussion amongst representatives from BEIS and UKGI on the Government's response.
- h. **POL00211460** is an email chain about *'handling Arbuthnot (and related) correspondence'*. Although I do not respond in the email chain, Patrick Bourke references that he has spoken to me and that I have said that we should *"avoid appeasing or giving the impression of appeasing JA"*. I do not remember this conversation but I imagine that I

thought it unwise to simply tell James Arbuthnot what he wanted to hear or to do so without knowing the full facts.

- i. **POL00130759** is an email sent from me to Ian Murray (MP) enclosing a short briefing on the mediation scheme and further attachments which go to the background of the mediation scheme. I believe that document **POL00130760** is the briefing document which I attached but I cannot say for definite. I cannot remember the context as to why this was sent.

18. I led the team which was responsible for communicating with MPs. The vast majority of these communications were about changes to Post Office branches and briefing MPs on the business' progress to becoming commercially sustainable following its separation from Royal Mail. I had overall responsibility for planning, drafting and delivering these communications, ensuring they were in line with broad key messages. As noted above, this was the case with all communications on subjects ranging from the transformation of the post office network, access to banking services, to mobile post offices in rural locations. Horizon was an exception. Due to its sensitivities, the content of any communication on Horizon was drafted separately by the Press Office with the oversight of the Communications Director. Once these communications were drafted, I may be consulted with to help decide to whom the communications would be sent, although sometimes I would be out of the loop entirely. I may also try to tighten up the language but the message would not change.

19. My team would keep records of every meeting with MPs. I remember that initially software called Salesforce was used for this purpose, but this was later

changed to a spreadsheet which held notes on every meeting held by a member of the public affairs team. If I met an MP or another stakeholder I would generally send an email update to relevant colleagues on the content and outcome of that meeting.

20. I have been asked to describe the nature of any communication strategy employed by POL in relation to Lord Arbuthnot and / or MPs raising concerns about Horizon and my involvement in formulating this strategy. As noted above, I did not have any involvement in drafting communication on Horizon or formulating any communication strategy around Horizon.

21. I did find the strategy on Horizon to be very robust and defensive. I recall the strategy was to demonstrate what the mediation scheme was doing and what it was designed to achieve rather than engage in the suggestion that the SPMs had been treated unfairly or that there was a flaw in the Horizon system. Obviously communications had to be consistent – there couldn't be one message for parliamentarians and one for everyone else.

22. As time went on, I remember feeling more wary about being so robust about the issue and I regret feeling too uncomfortable to challenge this approach in a significant way. I remember the first day I came back from maternity leave, I was given what I think was the draft opening statement from our QC in the litigation trials to have a look at. I was conscious that I didn't know anything about legal process but I remember thinking that the tone was overly aggressive and editing it to tone it down. I don't think my input was taken into account.

23. In respect of the communication strategy employed by POL in relation to Early Day Motions, this was similar to other organisations that attract political interest.

We would monitor Early Day Motions and their signatories to gauge political opinion on a range of issues that either directly or indirectly affected POL and we would encourage supportive MPs to sign or even table Early Day Motions. For example, document **POL00162657** is an email chain which shows the Public Affairs Team receiving an alert on a new Early Day Motion concerning Horizon. Mark Davies picked this up and asked the team to contact the signatories as it would have created a difficult situation for POL if the EDM gained traction. Personally, I would have felt uncomfortable about speaking directly to the signatories but would have probably sent out a briefing note on POL's position.

24. As far as I can recall the Post Office Advisory Council ('POAC') was established in response to a Government/Liberal Democrat policy paper about the future of the Post Office. I cannot remember the details but I think that there was pressure from the Shareholder, now that POL was independent, for its governance to evolve. There was talk about the POL becoming mutual and POAC was part of this mutualisation theme. Ultimately it was about opening up POL, with the aim being to bring a range of voices closer to the governance of POL.

25. There were around 25 members, comprising employees, postmasters, representatives from the unions, National Federation of SPMs (NFSP), retail, consumer groups, disability organisations and digital. Membership was voluntary. It was chaired by a Non Executive Director. Paul Vennells was also a member and I remember that she always attended the meetings which were held 2 – 3 times a year.

26. I was responsible for establishing the Council and running the secretariat. This included recruiting members, setting meeting agendas and following up actions. For example, **POL00423968** and **POL00423972** show me tweaking agendas. It was very time consuming as it involved a lot of management of colleagues in what was not a very culturally open organisation. For example, getting people to agree to agendas and managing sensitivities about opening up certain areas of the business, particularly with unions and the Chief Executive around the table. It was disbanded before I left because it became a talking shop, with no one in POL taking on any recommendations even though good ideas came up and Paula Vennells supported it.

27. The Inquiry have asked me to consider **POL00295528**. However, this is an email chain from before I started and so I do not feel able to comment upon it. As to whether complaints were prioritised on the basis of the sender, I would only generally respond to parliamentarians, or other stakeholder organisations, and so my audience was relatively narrow. It is standard practice in stakeholder management to consider an individual's position. For example, if there was correspondence from somebody who was deemed, at that time, to be particularly relevant because of their policy area then their correspondence may be flagged to me so that I could have greater oversight of our response. However, everyone would be responded to in a timely manner no matter who they were.

Second Sight, Project Sparrow and the Mediation Scheme

28. I do not remember having any role in formulating POL's communication strategy in relation to Second Sight's investigation. Those close to the mediation

scheme, including the legal team, would have worked with colleagues in the press team to formulate the communication strategy, with the communication director having overall responsibility. I can remember that communication was tightly controlled due to its sensitivity and need for confidence. I would have been brought in after the strategy had been decided if there were to be any communication to MPs.

29. Similar to the response to Second Sight's investigation, I would have had minimal involvement in formulating POL's response to their Part 2 Report. **POL00306722** is an email from Melanie Corfield forwarding me two documents: Response to Second Sight Part 2 report; and Rebuttals – updated September 2014. I understand that these are the same documents as at **POL00002415** (Response to Second Sight Part 2 report) and **POL00306723** (Rebuttals – updated September 2014). **POL00002415** is very technical and I would not have had a hand in writing this. I cannot remember **POL00306723** and do not know who wrote this but it is clear from reading the document now that POL were maintaining a very robust position against the allegations. I was often forwarded information to keep me in the loop in case I was asked about it. Often it was for my general awareness of the operation of POL and no further action from me would be taken.

30. The media strategy would have been set by the Communications Director and the Press Office, following the publication of Second Sight's Part 2 Report. They would have also had input from the Legal and others close to the mediation scheme. This might have been discussed with the Communications Director's direct reports when we all met but I cannot recall anything specifically. My area

of expertise was public affairs, and while I had worked closely with PR and press teams in my career, my views on media strategy were never sought on this issue. I trusted the professional judgment of those that I worked with.

31. I recall that Brunswick, a PR Consultancy, was brought in to help manage POL's reputational risks but, from memory, my involvement with them was minimal. **POL00384446** shows a member of my team, Sophie Bialaszewski, in her Horizon Communications Planning role, pulling together information to send a briefing pack to Brunswick with Mark Davies asking for contribution by myself and others. I cannot recall whether or not I contributed but I was not close to the detail in respect of Horizon and SPM prosecutions and so I do not think I would have had anything substantive to contribute. I do not believe that I was at the meeting when Brunswick were first briefed. This memory is supported by **POL00207399**, an email chain showing me introducing myself to them in August 2014, 2 months after they were initially instructed.

32. **POL00384471** is an email from Sophie Bialaszewski sent in June 2014 and attaching Brunswick's 'Horizon: Public Affairs Messaging' (**POL00384472**) and asking for mine and others feedback. I cannot remember this email and there is no email chain to suggest I responded.

33. **POL00101778**, **POL00101786** and **POL00101793** are all email chains relating to a debate in Parliament on 17 December 2014 about the Post Office Mediation Scheme. It was part of my job to be aware of debates that were directly or indirectly relevant to POL, and plan how we could put our position across. In some instances, if we thought it would be beneficial, I would contact MPs and ask if they were willing to attend the debate to, for example, ask

questions and put forward points which were helpful to POL. If they were supportive, I might brief them on the issue. In respect of this particular debate, the email chain shows that I am looking to line up a list of potentially supportive MPs but I cannot recall whether or not I did approach any MPs. It was not unusual for me to compile a list of supportive MPs, in case we decided to ask them to participate, but after weighing up the pros and cons decide not call upon them. Even if we did ask supportive MPs if they were willing to attend and speak in a debate, there was no guarantee that they would have done so.

34. **POL00149293** is an email chain concerning an article written in 'Wales Online' where the Ogmore MP, Mr Iranca-Davies is demanding "*that the Government publish a leaked report which is believed to be highly critical of the Post Office's handling of problems with the Horizon computer problem*". The email exchange shows me suggesting we try to meet him or send him a briefing and Belinda Crowe asks me for a word before deciding how to proceed. I cannot remember the outcome of that conversation. If I had written to Mr Iranca-Davies the key content would have been provided by Belinda's team and the Press Office.

35. **POL00150364** is an email chain which shows my response to an email from Gerry Sutcliffe MP who has written in about a former SPM who alleged that she was the victim of mistakes made by Horizon. In my reply I set out some background and say that, while the mediation scheme is closed to new applicants, we would be happy to investigate the SPM's concerns. I can't remember whether Mr Sutcliffe followed up. Following my reply, I forward a copy of the email to Belinda Crowe so that she is aware of the issue and could take any relevant action to help the SPM if they came forward.

36. **POL00101478** is an email chain discussing correspondence from James Arbuthnot who is expressing his concern about how the mediation scheme is working. It was very common for me to be copied into email chains such as this so that I was aware of current issues in case any input was needed from a public affairs position. I cannot recall what, if any, action I took in response. I never met James Arbuthnot. I only ever remember meeting with one MP (Ian Murray) about Horizon related issues. In that situation, it was merely to make introductions between the MP and Patrick Bourke as I knew Mr Murray.

37. The above emails demonstrate the nature and extent of my engagement with MPs in relation to Horizon. My role was very reactive, responding to MP communications and I often acted as a communication channel between POL and the MPs, sharing information and messaging that POL wanted to put out. As mentioned above, any messaging which went out on Horizon or the mediation scheme was carefully controlled with me effectively acting as a communications channel but having little input into the actual wording. I was often copied into communications so that I was aware of issues in case my advice about who and when to brief was needed.

38. From memory, my engagement with MPs following the publication of Second Sight's Part 2 report and the mediation scheme was limited. The publication of Second Sight's report was very difficult for POL and a rebuttal document was drafted (**POL00002415**). I can see that Mel Corfield sent me a copy of the Rebuttals document and Response to Second Sight Part 2 Final report in an email of 23 September 2014 (**POL00306722**). It is possible that I would have sent something similar out to MPs who had constituents in the mediation

scheme. **POL00078261** is a planning grid that shows a record of correspondence sent by me to MPs with SPMs in their constituency who applied to the mediation scheme. I cannot say for definite, but I believe that **POL00078267** is an example of one of these emails. Again, this is an example of how I would have acted as a communications channel between the Mediation team and MPs where the issue of Horizon is concerned.

39. In respect of the mediation scheme, I was often copied into correspondence about it and was briefed on facts such as the number of participants and MPs who had constituents in the scheme, but my role was peripheral. If an MP asked a question specifically about the scheme, I would have let the Mediation team know and they would have drafted the response. Again, my role was more reactive than proactive, responding to messages and acting as a go-between between MPs and the Mediation team.

40. The Inquiry have provided me with document **POL0040075** which is a presentation entitled 'Media Scenario Planning: Initial Complaint Review and Mediation Scheme'. I would not have been involved in this and cannot remember the presentation although it is possible that I would have been asked to action some of the action points listed in it, in respect of communication with MPs.

41. As mentioned above, when I first started at POL, Sophie Bialaszewski, a member of my team, was responsible for the communications planning around Project Sparrow. **POL00147377** is an email sent by Sophie in January 2014 about the media strategy for Project Sparrow which was to go to the Board. I cannot recall contributing to this document but think I would have been copied in

for awareness. As referenced above, Sophie reported to the Communications Director for this aspect of her role.

42. I do not know what process was in place by which information about Horizon and Project Sparrow were passed to the Communications team in POL as by the time I received any information, it had already been filtered through the press team and I would only see the finished material.

RELATIONSHIP WITH THE MEDIA

43. My role was narrowly focused - perhaps blinkered - on Public Affairs and so I had little, if any, involvement with the media. I do, however, recall that what the media was reporting was directly at odds with what colleagues were saying – they were adamant that Horizon was robust. I had worked in other large, high profile organisations and experienced situations where this had happened before and so I was used to this tension.

44. **POL00162505** is an email from Mark Davies letting senior colleagues know that the BBC is planning a programme on Horizon, alongside a debate in the House of Commons. The email attaches a 'Panorama note' which has not been disclosed but I imagine lays out POL's position on Horizon. I would not have been involved in drafting this.

45. **POL00174376** is an email from me to Mark Davies, Melanie Corfield and Ruth Barker, forwarding an email from my friend who worked for a TV listings magazine giving me a heads up of the transmission date of the Panorama programme. I remember I asked her if she could do this as the BBC were not forthcoming with the transmission date. I did not have any role in the media

response to the Panorama TV programme - this was simply me using my TV contacts to try and be helpful to the Press team so they had as much notice as possible before Panorama was broadcast.

46. **POL00228588** is a request from BBC Panorama for Paula Vennells to be interviewed on the Horizon system issues which I have forwarded to Mark Underwood for his information. This email is not relevant to Public Affairs and so I am unsure why it was sent to me. I would not have had any involvement in whether Paula should attend a media interview and certainly no decision-making power although there is a chance that Mark might have canvassed for views at the team meeting, but I cannot remember. This is likely an example of me being copied into information so that I am in the loop about current issues.

SELECT COMMITTEE – FEBRUARY 2015

47. **POL00150551** is an email chain attaching my tracked changes to POL's response to a Westminster Hall debate (**POL00150552**). The email chain indicates that the first draft was written by Belinda Crowe and Mel Corfield. However, as the document was intended for use with MPs, I would have reviewed it. My review would be primarily focused on the language and style of communication, not the actual content as can be seen in the tracked changes.
48. **POL00027731** is an email from Mark Davies to senior colleagues regarding an update on Project Sparrow and the Department for Business, Innovation and Skills ('BIS') Select Committee hearing in February 2015.
49. **POL00310730** is an email chain about Ian Henderson from Second Sight appearing before the BIS Select Committee to give evidence and concerns

being raised about him giving evidence alongside Paula Vennells. It was part of my role to liaise with the Committee which is why I think that I picked this up and called the Clerk who I state is “*not budging*” on the position. Mark Davies subsequently drafted wording to be sent to the Clerk following my conversation with them, further explaining why POL is concerned that they give evidence separately to Second Sight. **POL00150982** is the email chain discussing this proposed wording with myself and others making suggested amendments.

50. Following the BIS Select Committee hearing, Rod Williams sets out his legal advice in an email to Mel Corfield which Mark Davies subsequently forwarded to myself and others (**POL00221138**). Mark is particularly concerned about making a statement to the BBC in respect of the allegation from Second Sight that POL were not disclosing information to the Defence in connection with the prosecution. Although I am copied in, this would have been for information only I would not have been involved in drafting a statement to the BBC.

51. Following the BIS Select Committee hearing, Belinda Crowe emailed me with a mark-up of the transcript, along with a document identifying which points needed rebutting. She sent this to me asking me to “*hold the pen finally in terms of finessing this from a PA perspective*” (**POL00221184**). My role was to finesse the language and make it presentable but I did not fact check the content as this was carried out by Belinda, along with Andrew Parsons of Bond Dickinson. I cannot remember this specific document and whether anything actually happened with it, it might have just been prepared to be kept in the back pocket in case we needed to use it.

52. In terms of my role in making preparation for the BIS Select Committee hearing in February 2015, prior to it taking place I assisted by acting as a liaison between POL and the committee clerk, as shown in **POL00310730** where I am seen to have spoken to the clerk about Second Sight and POL giving evidence. I also put together a briefing pack for witnesses to read ahead of being questioned. This would have contained information on the issues that were likely to be covered in the session, as well as biographies of committee members. This has not been disclosed by the Inquiry but would have been an extensive document. I would have been guided on the content by the Select Committee Inquiry's Terms of Reference which would provide areas that would be covered in the session. To create this document I would have spoken to different departments to obtain information for the briefing, for example the Mediation team and legal for details of the mediation scheme, IT for details about Horizon and Angela Van-Den Bogerd for details about training and support for sub-postmasters and background data such as how many people use Horizon. My role was to collect all of this information from the business and pull it together so that there was one note which could be given to Paul Vennells and Angela Van-Den Bogerd so that they had all the relevant information needed to answer any questions. After the information was collated I would have sent it to each relevant department for their review to fact check. Legal colleagues would have had oversight and I think that Patrick Bourke and Mark Davies would have reviewed the final note to decide on any particular areas that should be emphasised.

53. **POL00117096** is an email that I sent to Paula Vennells the evening before the hearing with two attachments. The first is key facts on the mediation scheme for

Paula to have in front of her (**POL00117098**). This is not the full briefing but an abbreviated version so that she has key information easily accessible to her on the day. The second contains additional information on anticipated areas of questioning (**POL00117097**). I would have drafted these, with input from the press team, mediation team, legal, IT and Network.

54. In addition to oral evidence, we also provided written evidence which is at **POL00026702**. Again, I would have written this, with input from the press team, mediation team, legal, IT and Network. Patrick Bourke and Mark Davies would have signed it off.

55. Ahead of colleagues appearing in front of a select committee, it was usual for me to ask a public affairs consultancy to take them through a rehearsal. I imagine that the same would have been true in this case although I don't remember the details.

56. Following the hearing, it was the role of the Press team and Communications Director to decide what the appropriate lines to take were in respect of the press although I was sometimes copied into correspondence for information purposes.

CONCLUSIONS

57. There are no other matters that I would like to draw to the Chair's attention.

Statement of Truth

I believe the contents of this statement to be true.

Signed:





GRO

Dated: 24 October 2024

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No	URN	Document Description	Control Number
1.	POL00110047	Post Office Communications Plan 2015/16	POL-0111143
2.	POL00200475	Industry in Parliament Trust dinner agenda	POL-BSFF-0038538
3.	POL00101766	Email from Jane Hill to Gavin Lambert, Mark R Davies, Richard R Weaver and others in re to 'information for MP drop in tomorrow' dated 09/12/2014.	POL-0101349
4.	POL00162224	Email from Jane Hill to Angela Van-Den-Bogerd, Belinda Crowe and Mark R Davies. RE: event in Parliament tomorrow - 4 to 6pm.	POL-0150661
5.	POL00158072	Post Office weekly briefing pack to support the principles in our leadership behaviours around knowing the numbers and working with others.	POL-0146415
6.	POL00162071	Email from Mark Davies to Jane Hill re BBC Wales - Horizon Documentary	POL-0150516
7.	UKGI00004680	Email from Jane Hill to Laura Thompson re FOI responses on prosecutions.	UKGI015494-001
8.	UKGI00004692	Email from Laura Thompson to Richard Callard re: FW: FOI Responses to Prosecutions	UKGI015506-001
9.	UKGI00023280	Email from Tom Cooper to Annabelle Miles CC'ing Alex Col, Stephen Clarke and others RE: NFSP Embargoed Press Release on POL Select Committee Inquiry	UKGI032175-001
10.	POL00162657	Email from Martine Munby to Mark R Davies, Patrick Bourke, Mark Underwood & Ors RE: Post Office - Monitoring Early day motion 427 - POST OFFICE HORIZON COMPUTER SYSTEM	POL-0151053
11.	POL00211460	Email from Mark R Davies to Patrick Bourke cc Belinda Crowe, Chris Aujard and others RE: Handling Arbutnot (and related) correspondence - regarding Second Sight and hostile MPs	POL00211460
12.	POL00423968	Email from Mark R Davies to Louise Chatfield: Please ignore the attachment to my last email- this is the right attachment.	POL-BSFF-0238784
13.	POL00423972	Post Office Advisory Council: Inaugural Meeting, 18th and 19th March 2014.	POL-BSFF-0238788
14.	POL00295528	Email from Theresa Iles to Mia Porter re FW: Andrew Tyrie MP.	POL-BSFF-0133578
15.	POL00384446,	Email from Mark R Davies to Sophie Bialaszewski, Nina Arnott, Jane Hill and others, Re: Pack for Brunswick	POL-BSFF-0211333
16.	POL00384471,	Email from Sophie Bialaszewski to Mark R Davies, David Oliver, Melanie Corfield and others, Re:	POL-BSFF-0211358

		Brunswick Public Affairs Messaging	
17.	POL00384472,	POL Brunswick Horizon Public Affairs Messaging	POL-BSFF-0211359
18.	POL00207399,	Email from Belinda Crowe To: Jane Hill, Mark R Davies and CC: Melanie Corfield re RW Letter to SS 13082014.docx	POL-BSFF-0045462
19.	POL00147377	Email thread from Sophie Bialaszewski to Mark R Davies, Nina Arnott, Jane Hill & others RE: Scheme Media Planning	POL-BSFF-0006500
20.	POL00040075	Post Office Media Scenario Planning- Initial Complaint Review and Mediation Scheme Presentation	POL-0036557
21.	POL00002415	Post Office, Initial Complaint Review and Mediation Scheme, PO Reply to Second Sight's Briefing Report –Part Two	VIS00003429
22.	POL00306723	Report about Draft Rebuttals documents	POL-BSFF-0144773
23.	POL00306722	Email from Melanie Corfield to Jane Hill. CC ing Mark R Davies, Nina Arnott and others. RE: Sparrow latest	POL-BSFF-0144772
24.	POL00101778	Email from Mark R Davies to Belinda Crowe, re ONE show	POL-0101361
25.	POL00101786,	Email from Mark R Davies; re: ONE show Belinda Crowe to	POL-0101369
26.	POL00101793	Email from Mark R Davies to Belinda Crowe, re Debate next week	POL-0101376
27.	POL00149293	Email chain including Jane Hill (POL); Belinda Crowe (POL); Melanie Corfield (POL) & Others Re: Media Coverage following 2nd sight report	POL-BSFF-0008413
28.	POL00150364	Email chain including Belinda Crowe (POL); Jane Hill (POL); Mark R Davies (POL) & Others Re: PO Mediation Service	POL-BSFF-0009476
29.	POL00101478	Email from Mark R Davies to Belinda Crowe, cc'd Avenue O'Farrell, Tom Wechsler, Chris Aujard and others re: Post Office mediation process	POL-0101061
30.	POL00162505	Email from Mark Davies to Martin George, Mark Siviter, Peter Markey and others others re: Panorama and Horizon	POL-0150911
31.	POL00174376	Email chain from Jane Hill to Mark Davies, Melanie Corfield and others re Panorama	POL-0168376
32.	POL00228588	Email from Jane Hill to Mark Underwood1 Re: FW: BBC Panorama IV request	POL-BSFF-0066651
33.	POL00150551	Email chain from Jane Hill to Patrick Bourke, Mark R Davies, cc'd Tom Wechsler and others re The "dossier".	POL-BSFF-0009663

34.	POL00027731	Email from Mark R Davies to Paula Vennells, Martine George, Neil Hayward and others RE: Sparrow update	POL-0024372
35.	POL00310730	Email from Jane Hill To: Mark R Davies, Patrick Bourke CC ing Belinda Crowe and others. RE: BIS Committee hearing 3 February 2015	POL-BSFF-0148780
36.	POL00150928	Emails from Jane Hill to Mark R Davies RE: FW: Letter to committee	POL-BSFF-0010040
37.	POL00221138	Email from Mark R Davies to Rodric Williams, CC'ing Melanie Corfield, Jane Hill and others RE: Legal position on legal advice	POL-BSFF-0059201
38.	POL00221184	Email from Belinda Crowe to Melanie Corfield, Andrew Parsons, Mark Underwood and others RE: Doc for select committee	POL-BSFF-0059247