

Witness Name: David Basil George Oliver

Statement No: WITN09780100

Dated: 12 December 2024

POST OFFICE HORIZON IT INQUIRY

FIRST STATEMENT OF DAVID BASIL GEORGE OLIVER

I, David Basil George Oliver, will say as follows in response to a Request for Information pursuant to Rule 9 of the Inquiry Rules 2006 – Request number 1 dated 4 November 2024 (the “**Request**”), regarding matters falling within Phase 5 and 6 of the Inquiry.

INTRODUCTION

1. The Inquiry has asked me to provide a brief outline of my professional background, summarising my career and qualifications.
2. I am currently employed by PA Holdings Limited, part of the PA Consulting Group (“**PA**”), a professional services and consultancy firm that works with public, private and third-sector organisations. PA provides a wide range of services, including management consulting, IT consulting, and technology and

innovation services across a variety of sectors, including local and national governments.

3. I studied Natural Sciences at the University of Cambridge. I am currently a Partner at PA. I joined PA in November 2013 as a Principal Consultant. Before that, I spent 10 years in the Civil Service, entering as a Civil Service Policy Fast Streamer, and going on to have a series of senior Civil Service roles focussing on policy, strategy and private office.
4. For the relevant period of time that I was providing services to the Post Office Limited ("**POL**"), I was a Principal Consultant at PA. The duration of the POL assignment was between December 2013 and October 2014. My assignment to POL was primarily to provide support, management and programme management services for the Initial Complaints and Mediation Scheme (the "**Scheme**"). My formal role was Programme Manager of the Scheme.
5. The Inquiry has asked me to set out in detail my appointment to that role, my relevant training and experience, my understanding of my role and responsibilities (including any material changes during the duration of the assignment), who I reported to, and my general views on the competence and professionalism of the team and managers at POL.
6. PA had a pre-existing relationship with POL, prior to me becoming employed by PA. Ahead of the assignment, I recall being asked to attend an initial meeting with POL (Belinda Crowe), where my assignment to POL to assist in the running of the Scheme was first discussed.

7. The initial assignment was to assess the programme and make recommendations for improvements over a circa 4-week period. This extended into supporting the delivery and administration of the Scheme.
8. I recall that the main reason for POL seeking to obtain extra support for a degree of the administration of the Scheme was because, up until that point, there had been a lack of general programme structure / governance for the delivery of the Scheme and also a lack of sufficient resource within POL, to commit to it. The Scheme was in danger of stagnating and not meeting the assurances that POL had given to external stakeholders. There was also an element of public scrutiny (both political and from the media) associated with the Scheme. My past experience in the Civil Service, which included handling external communications, led to me being selected to provide assistance to POL.
9. As above, my educational background is in Natural Sciences. My relevant professional background (at the time of being engaged by POL) was working within the Civil Service, in roles focussing on policy and strategy. Generally, I had experience of delivering and administering complex projects. I do not have any relevant technical IT qualifications or experience, nor am I legally trained.
10. My role was to be the Programme Manager of the Scheme. In short, my role was to assist POL in delivering and administering that Scheme, such that it was progressed and completed as efficiently as possible, whilst servicing (where possible) the requirements of all interested stakeholders. At the time of my engagement by POL, the Scheme did not have a clear level of governance, there were a significant number of cases / claims from sub

postmasters / subpostmistresses (“**SPM**”) which had been entered into the Scheme, and there were concerns within POL about how those cases could be properly progressed and resolved through the Scheme, within an appropriate and acceptable timescale (based, in part, on a lack of available capacity and expertise within POL). I will necessarily provide more detail on my role in the rest of my statement, whilst addressing the Inquiry’s specific questions.

11. My direct POL client for the assignment was Belinda Crowe. My senior reporting manager for the assignment was Chris Aujard. Overall project reporting for the Scheme flowed through Chris Aujard to both Paula Vennells and Alice Perkins. Paula Vennells and Alice Perkins were both informally updated, and formally updated, via board / sub-committee updates. Whilst not formally part of the Scheme, POL’s own investigation of cases which had been accepted into the Scheme was led by Angela van den Bogerd. Angela van den Bogerd was also responsible for managing the separate Business Improvement workstream, which ran concurrent to the Scheme (i.e. that any potential improvements / learning points for POL systems identified through the administration of the Scheme and the handling of cases, would be considered and implemented through that workstream).
12. At the time and based on my interactions, I generally considered the team within POL, in terms of the narrow focus of my engagement (i.e. to administer the Scheme) to be competent and professional. As above, my main client contacts were Belinda and Chris; both of whom I understand had not been at POL for a significant period of time before my assignment commenced in

December 2013. Belinda appeared to be an experienced mid-senior manager, who was open-eyed to the issues facing the Scheme and the work needed to try and progress it. I believe that Chris had come from a predominantly Financial Services background and appeared to have a wide-span of workstreams under his control as General Counsel, beyond the Scheme (such as the criminal prosecutions, general commercial, M&A etc). It was clearly a sensitive period for POL, both in terms of potential financial and reputational risk, and it appeared to me that there was a genuine intention by those I worked closely with (primarily, Belinda and Chris) to progress the Scheme in an effective manner, such that as many cases as possible could reach a satisfactory resolution.

BRIEF ADDITIONAL BACKGROUND AND CLARIFICATION

13. Whilst the Inquiry has not asked me to address the following points, I believe they are necessary to provide sufficient context and clarity to the answers that I will go on to provide throughout this statement.

14. As stated above, I do not have any technical IT expertise and that my role within POL did not involve any aspect of considering or analysing the Horizon Software as a whole or in specific cases. Considering and / or addressing the technical substance of any claims which were being made via the Scheme (i.e. alleged technical faults within Horizon by SPMs) did not fall within my remit and did not have any impact upon the administration of the Scheme itself. The Scheme was effectively a form of dispute resolution between SPMs and POL. Equally, the technical position adopted by POL in relation to Horizon (i.e. that there were no systemic issues), both as a mediating party within the

Scheme and publicly, did not impact upon my administration of the Scheme itself, nor was it part of my role to interrogate, assess or advise in relation to POL's technical position.

15. I am not legally trained and that, whilst POL sought external legal advice from a number of law firms (which, in some instances, I had sight of and shall address in this statement), my involvement in the Scheme was a separate and distinct workstream from any civil and / or criminal proceedings that were undertaken by POL against SPMs, and the associated legal advice that was obtained. During my assignment with POL, I was necessarily aware of those proceedings and the extent to which they effected the way in which they could be progressed and settled through the Scheme. However, I was not part of any decisions relating to the conduct of those proceedings, POL's disclosure obligations within (or after) those proceedings, or the safety of those proceedings (particularly convictions).

16. During my assignment with POL, I was provided with a POL laptop and a POL email account. I was also required to predominantly work on POL premises and to leave my POL laptop in a secure location within POL premises overnight. I was not provided with open access to POL systems / data during my time working on the Scheme; my level of access was limited to information (passed to me by the POL team) and systems which were necessary to allow me to administer and progress the Scheme. As set out above, my work on the Scheme for POL concluded in October 2014, at which point I no longer had any access to my POL email account or laptop.

17. It has therefore been c.10 years since I had any direct involvement with, or access to, POL information and systems. For the purposes of providing this statement, I have not been able to check or cross-refer any of the exhibits which have been provided to me by the Inquiry, due to my inability to access the POL laptop / email account upon which all the relevant work was conducted.
18. Due to the above, the information and answers provided by me in this statement are entirely limited to: (i) the content of the exhibits which have been presented to me by the Inquiry; (ii) the relevant period where I was engaged by POL, namely December 2013 to October 2014; and (iii) the extent of my recollection of the Inquiry exhibits and associated issues from c.10 years ago.
19. In responding to the Inquiry's topics and questions, I shall confirm which exhibits have been provided to me and that I have reviewed, before responding to the Inquiry's specific questions and further referring to the exhibits where applicable / necessary.
20. For the purposes of responding to the Inquiry's deadline for this statement, and in light of the significant scope of the Inquiry's Request (168 individual questions, many with a significant number of additional sub-questions, together with in excess of 1,800 pages of accompanying exhibits), it has not been possible to provide detailed commentary and analysis of every exhibit. I confirm that I have reviewed each of them, in order to answer the questions put to me. This pragmatic approach has been taken to ensure that a statement could be provided to assist the Inquiry, within the specified timeframe and to prevent any delay to the Inquiry's schedule.

KNOWLEDGE OF HORIZON ISSUES

21. The Inquiry has asked me to confirm what IT expertise I had during my assignment with POL. As per para. 14, I did not have any such IT expertise.
22. The Inquiry has asked me to confirm what knowledge and experience I had of the Horizon IT System during my time with POL, together with any relevant training, any steps that I took to increase my knowledge of Horizon IT System, any initial opinion I formed and whether I noticed any common complaints from SPMs.
23. As per para. 14, I did not have any technical knowledge or experience of Horizon during my time with POL. I was not provided within any specific training on the system (beyond a broad understanding of what it did, but not how it did it) and the role I was undertaking did not require me at any point to take any steps to increase my knowledge of the system itself. I did not (and do not) have the technical expertise to allow me to provide any formal opinion on the system itself. I was generally aware that there was a dispute between POL and SPMs, whereby POL held a position that there were no systemic issues with the Horizon system, and that various SPMs had alleged that there were specific technical faults with the system. Those opposing positions had formed the basis upon which the Scheme had been created (prior to my assignment) and was the proposed method of dispute resolution to try and narrow the gap, or otherwise resolve, those opposing positions. In administering the Scheme, it was not part of my role (nor did I have the

expertise) to analyse the credibility of the respective positions of either POL or any SPM.

24. I necessarily became aware, through my administration of the Scheme and knowledge of the cases that were being processed through it, of various common themes within SPM cases / claims. Those common themes were analysed and are set out in **POL00040076**, as broadly falling into three categories: (i) training and support issues; (ii) Hardware / Software Issues with Horizon; and (iii) and lack of an audit trail.

BUGS, ERRORS AND DEFECTS (“BEDs”) IN HORIZON

25. In responding to this topic, and in order to address the Inquiry’s questions, the Inquiry has asked me to consider the following exhibits:

25.1. **POL00021872**; and

25.2. **RLIT0000007**.

26. I confirm that I have reviewed those exhibits and they have informed my answers to the below questions. I shall make specific references to exhibits where necessary, to explain my answers.

27. The Inquiry has asked me to confirm when I first became aware of allegations and complaints regarding BEDs in the Horizon system, or a lack of integrity in the Horizon system. I was generally aware of allegations and complaints regarding Horizon from the outset of my assignment with POL, as those issues

formed the whole basis upon which the Scheme had been devised and implemented. As per para. 14, I did not have the necessary expertise, nor was it part of my role in administering the Scheme, to reach any form of view on the nature or veracity of the complaints. Equally, I did not have the necessary expertise, nor was it part of my role, to form a view on the veracity of POL's position whereby there were no systemic issues within the Horizon system.

28. The Inquiry has asked me to confirm what, if any, knowledge I had of the BEDs summarised in **RLIT0000007**. This exhibit post-dates the relevant period where I was engaged by POL. As per para. 24, I recognise some of the BEDs outlined in the document as falling within the common theme of Hardware / Software issues with Horizon, identified during the administration of the Scheme (i.e. forming the basis of SPM complaints), however I do not (and did not) have the technical expertise to provide any substantive opinion on the BEDs themselves.

29. The Inquiry has asked me to confirm any involvement that I, or other members of the Scheme management, had in dealing with and responding to complaints by SPMs. I refer to para. 11 and para. 24. I had broad knowledge and superficial (i.e. non-technical) understanding of complaints being raised by SPMs, in relation to those cases which had been accepted into the Scheme. It was not part of my role to investigate or respond to the subject matter of those complaints, as this did not relate to the administration of the Scheme itself (as a forum for discussion and mechanism for potential dispute resolution between the positions of POL and SPMs, through mediation). POL investigations into individual complaints were overseen by Angela van den

Bogerd, to inform the position that POL would adopt at any final mediation, as a party to that mediation. I did not form part of that investigation team and was not privy to the technical outcomes of any investigations, to the extent that any BEDs were, or should, have been identified.

30. The Inquiry has asked me to set out my understanding of POL's approach to handling such complaints. I answer this in more detail at para. 177, where I address how the Scheme operated in practice and how complaints were processed through it.
31. The Inquiry has asked me to set out the steps POL took to investigate concerns raised regarding systemic and / or intermittent errors in Horizon. As per para. 29, POL's investigations into complaints was a separate and distinct workstream to the administration of the Scheme, managed by Angela van den Bogerd. I was not part of the investigation workstream.
32. The Inquiry has asked me to reflect on whether I consider POL did enough to investigate the concerns raised about Horizon. I refer again to para. 29, whereby I was not part of the investigation workstream. I discuss later in this statement from para. 91, the advice POL received from Linklaters on 20 March 2014 (**POL00105529**) – specifically that *"We note that there is, so far as we understand it, no objective report which describes and addresses the use and reliability of Horizon. We do think that such a report would be helpful", that "Second Sight seem to have relied on concerns raised by the JFSA [Justice for Subpostmasters Alliance] to prepare their report...but they do not address any fundamental questions about the problems with Horizon", and that "They [Second Sight] have done so without reference to any robust evidence as to*

how and why there may have been malfunctions with Horizon or how any such malfunctions could have caused the losses in the particular case". On reflection, POL should have ensured that there was an objective report which addressed the Horizon system as a whole (which, I understand, was originally part of Second Sight's scope of engagement). Equally, there were concerns raised relating to the quality of the work being undertaken by Second Sight (see para. 96), particularly around the absence of a firm evidential basis for complaints and issues being raised. POL attempted to rectify the position by instructing Deloitte to undertake an assurance review (see section from para. 107), but this did not provide the objective report and evidential base which had been absent throughout. I reiterate that my role did not relate to investigating concerns directly, but the lack of evidence relating to the concerns raised about Horizon had an impact upon the effective running of the Scheme and the extent to which a satisfactory resolution (including the narrowing of any issues) within any specific mediation case could be achieved.

FUJITSU

33. In responding to this topic, and in order to address the Inquiry's questions, the Inquiry has asked me to consider the following exhibits:
- 33.1. **POL00108424**; and
 - 33.2. **POL00029710**.

34. I confirm that I have reviewed those exhibits and they have informed my answers to the below questions. I shall make specific references to exhibits where necessary, to explain my answers.
35. The Inquiry has asked me to confirm if I am aware of whether any “*further explanation*” was provided, in relation to Angela van den Bogerd’s email on 14 April 2014 [**POL00108424**]. Specifically, the email chain relates to the “Helen Rose Report” and the suggestion that “*Fujitsu have the ability to impact branch records via the message store but have extremely rigorous procedures in place to prevent adjustments being made without prior authorisation*”. I was aware of this suggestion, which I would generally describe as the “remote access” issue. However, I cannot recall any further discussion on this point and cannot comment on whether it was separately progressed and discussed by other individuals within POL. I also cannot recall any occasion where I liaised directly with Fujitsu, during my assignment with POL. I do recall that lines of communication with Fujitsu were tightly controlled and that, from POL’s perspective, there was no requirement for Fujitsu to interface with the administration or management of the Scheme itself; their involvement was limited to assisting POL’s investigations which, as per para. 29, was led by Angela van den Bogerd and was a distinct workstream that I was not party to.
36. **POL00029710** is from 2008 and therefore pre-dates my assignment with POL. I can see that it relates to the issue of “remote access”. I cannot recall if I ever saw this email during my assignment with POL.

37. The Inquiry has asked me to confirm what knowledge did I and the other members of the Scheme management team have of Fujitsu's remote access privileges and their ability to amend branch transaction data. I cannot speak as to the knowledge of any other members of the Scheme management team. Personally, I was broadly aware of the "remote access" issue, insofar as it formed part of the common themes within the Scheme and I was copied into various emails where it was discussed (e.g. **POL00108424**). However, I refer to paras. 14 and 23; my role did not relate to the technical investigation of issues or the veracity of complaints themselves.
38. In responding to this topic, and in order to address the Inquiry's questions, the Inquiry has asked me to consider the following exhibits:
- 38.1. **POL00138077**;
 - 38.2. **POL00138101**;
 - 38.3. **POL00108521**;
 - 38.4. **POL00021883**; and
 - 38.5. **POL00021870**.
39. I confirm that I have reviewed those exhibits and they have informed my answers to the below questions. I shall make specific references to exhibits where necessary, to explain my answers.
40. The Inquiry has asked me to describe any circumstances in which I had contact with Fujitsu, whilst working for POL. As per para. 34, I cannot recall

any occasion whereby I contacted Fujitsu or attended any meetings where Fujitsu personnel were present.

41. On that basis, in response to the Inquiry's follow-on questions, I am not able to confirm the identify of any individual from Fujitsu with whom I was in contact, nor can I detail any communications regarding BEDs in Horizon, or Horizon's general integrity.
42. I did not consult with either POL's or Fujitsu's IT teams to investigate any complaints relating to Horizon; this was not part of my role. I cannot comment on the extent to which any of the team were involved in such investigations.
43. The Inquiry has asked me to comment on the extent to which I consider sufficient information regarding BEDs in Horizon was passed to POL by Fujitsu. As I was not part of that relationship or line of communication / investigation, I cannot comment upon this.

THE HELEN ROSE REPORT

44. In responding to this topic, and in order to address the Inquiry's questions, the Inquiry has asked me to consider the following exhibits:
 - 44.1. **POL00116487;**
 - 44.2. **POL00029707;**
 - 44.3. **POL00116480;**
 - 44.4. **POL00116486;**
 - 44.5. **POL00108439;**

44.6. **FUJ00086811**; and

44.7. **POL00020634**.

45. I confirm that I have reviewed those exhibits and they have informed my answers to the below questions. I shall make specific references to exhibits where necessary, to explain my answers.

46. The Inquiry has asked me to confirm when I first became aware of the Helen Rose Report / the Lepton Report. I cannot recall when I first became aware of the Helen Rose Report [**FUJ00086811**]. Prior to reviewing the exhibits provided by the Inquiry, I would have said that I had never seen the report before. However, I acknowledge that the exhibits provided show that I was copied into various emails discussing the report and that the report was attached to some of those emails. The report itself pre-dates my assignment with POL, though I do not recollect it as a key document in my role.

47. The Inquiry has asked me to confirm my understanding of how and why the report was commissioned. As above, the report itself pre-dates my assignment with POL. I cannot therefore comment upon the specific circumstances in which it was commissioned. From reading the report itself, I can see that it relates to a reversal transaction issue that had been raised by an SPM, which took place in October 2012 (again, pre-dating my assignment with POL).

48. The Inquiry has asked me to confirm, during my assignment with POL, what knowledge I had as to the findings of the report in relation to BEDs in Horizon.

As per para. 46, prior to reviewing the Inquiry's exhibits I would have stated that I had never seen the report before. From reading the report as part of the preparation of this statement, I do not (and did not) have any knowledge beyond the content of the report itself.

49. During my assignment with POL, I do not recall the report being a substantial issue. My understanding was that it was primarily being dealt with by POL's criminal prosecution team (Jarnail Singh, Chris Aujard), which was a separate and distinct workstream to the Scheme, and one which I did not have any involvement; I refer to para. 15. I was aware that the report had been disclosed to SPMs (but was not involved in the decision-making process) and that the report was referred to within various SPM claims within the Scheme, relating to the SPMs complaints with the Horizon system.
50. The Inquiry has asked me to confirm how and to what extent were the findings of the report communicated to me and others within the Scheme management. As I set out above, I acknowledge that I was aware of the report during my assignment with POL but that, until reviewing the exhibits provided by the Inquiry, I would have stated that I never had sight of it. I have already commented upon what I understand the findings of the report to be. I cannot comment on the extent to which the findings (or implications) were more broadly communicated within POL, beyond the exhibits which I have been referred to.

51. The Inquiry has asked me to set out my understanding of POL's response to the report. Beyond my understanding that it had been disclosed to various SPMs (which led me to believe that the report's findings were not fundamentally problematic to POL's overarching position, for the purposes of the Scheme, that there were no systemic issues with the Horizon system, which POL maintained throughout my assignment), I cannot otherwise comment upon POL's wider response to the report or its findings.
52. The Inquiry has asked me to set out my understanding of the use that POL made of the report. I repeat my answer at para. 51 above.
53. The Inquiry has asked me to confirm to whom within POL the report was disseminated. I cannot confirm the POL recipients of the report, beyond those individuals who are included within the email chain exhibits set out at para. 44.
54. The Inquiry has asked me to confirm what, if any, impact the report had on how I (and the team) on the Scheme dealt with and responded to complaints from SPMs about BEDs and / or the integrity of Horizon. Beyond the fact that the report had been disclosed by POL to various SPMs, and thereafter was referenced by SPMs in a number of the cases being progressed through the Scheme, the report itself did not have any impact upon the administrative running of the Scheme. As per para. 23, my role in administering the Scheme did not extend to the consideration of the substantive technical positions of either POL or SPMs, in relation to the existence of BEDs or the integrity of Horizon as a whole.

BEDs referenced in Second Sight's Interim Report

55. In responding to this topic, and in order to address the Inquiry's questions, the Inquiry has asked me to consider the following exhibit:

55.1. **POL00099063.**

56. I confirm that I have reviewed that exhibit and it has informed my answers to the below questions.

57. The Inquiry has asked me to confirm when and how I became aware of this report. Whilst Second Sight's interim report dated 8 July 2013 pre-dated my assignment with POL, I confirm that I was aware of its content during my assignment. I cannot recall specifically when I was made aware of it; it was certainly towards the start of my assignment (either December 2013 or January 2014), and it may have formed part of some initial "reading-in" material that was provided to me when I first started my assignment with POL.

58. The Inquiry has asked me to confirm, during my assignment with POL, what knowledge I had as to the findings of the report in relation to BEDs in Horizon. My recollection is that the findings of the report were a consistent reference point throughout my assignment with POL; specifically, from POL's perspective, that Second Sight "*have so far found no evidence of system wide (systemic) problems with the Horizon software*". As previously explained, this was (and remained) POL's position throughout my assignment. In terms of

BEDs, I was aware that the report referenced “2 incidents where defects or “bugs” in the Horizon software gave rise to 76 branches being affected by incorrect balances or transactions, which took some time to identify and correct”. As far as I am aware, the detail of those incidents was disclosed by POL to Second Sight, as opposed to Second Sight identifying the incidents through their own investigation. The report also summarised other preliminary conclusions, some of which related to POL’s handling of individual complaints, as opposed to issues with the Horizon system itself. As per para. 23, my role in administering the Scheme did not extend to the consideration (or engagement with) the substantive technical positions of either POL or SPMs, in relation to the existence of BEDs or the integrity of Horizon as a whole.

Gareth Jenkins

59. In responding to this topic, and in order to address the Inquiry’s questions, the Inquiry has asked me to consider the following exhibits:

59.1. **POL00113111;**

59.2. **POL00029707;** and

59.3. **POL00020634.**

60. I confirm that I have reviewed those exhibits and they have informed my answers to the below questions. I shall make specific references to exhibits where necessary, to explain my answers.

61. The Inquiry has asked me to confirm what knowledge I had of Gareth Jenkins' role as an expert witness in past criminal prosecutions and the reason why a new Horizon Subject Matter expert was required. I was aware that POL had an expert witness from Fujitsu (I cannot recall if I specifically knew it was Gareth Jenkins) and that their evidence had been used, and tested through cross-examination, during criminal prosecutions. I believe this was relayed to me towards the start of my assignment (albeit, not in any great detail), as a basis for understanding POL's general technical position within the Scheme (also supported by the Second Sight interim report), that there were no systemic issues with Horizon. I recall knowing that POL was looking for a new Horizon Subject Matter expert, but I do not recall knowing that this was because of any fundamental issue with the previous expert (i.e. Gareth Jenkins). As per para. 15, the handling of criminal prosecutions, both historic and ongoing, was a separate and distinct workstream to my administration of the Scheme and therefore it did not materially affect my role.
62. In responding to this topic, and in order to address the Inquiry's questions, the Inquiry has asked me to consider the following exhibit:
- 62.1. **POL00006798.**
63. I confirm that I have reviewed that exhibit and it has informed my answers to the below questions.

64. The advice note from Cartwright King dated 15 July 2013 pre-dates my assignment with POL. As per paras. 17 and 18, I am not able to access my POL laptop or email account to check whether I ever had sight of this advice, after I started my assignment with POL. From the exhibits provided to me by the Inquiry, I cannot see that I was sent a copy of the advice.
65. The Inquiry has asked me to confirm what knowledge, if any, did I have of the advice at the time of my assignment with POL. To the best of my knowledge and recollection, I was not aware of the advice. I am aware of the content of the advice now, through the disclosure of it by the Inquiry for the preparation of this statement, but cannot recall ever seeing it during my assignment with POL.
66. The Inquiry has asked me to confirm what knowledge, if any, did I have of any contact that had taken place between Mr Gareth Jenkins and Second Sight. I do not have any knowledge of any such contact.
67. The Inquiry has asked me to reflect on whether I consider I had sufficient information regarding BEDs and other issues with the integrity of Horizon during my assignment with POL. I refer again to previous sections of my statement (paras. 14, 15 and 23). Fundamentally, I did not have the technical expertise to offer any opinion on the issues relating to Horizon. I was also not involved in the handling of criminal prosecutions, associated expert evidence (i.e. Gareth Jenkins) or considerations around the safety of those resulting convictions. For the purposes of administering the Scheme, whereby I

understood that there were opposing positions adopted by both POL and SPMs respectively in relation to technical issues, the analysis or veracity of those positions was not part of my role and did not materially affect my administration of the Scheme.

INDEPENDENT LEGAL ADVICE AND REVIEWS

Cartwright King

68. In responding to this topic, and in order to address the Inquiry's questions, the Inquiry has asked me to consider the following exhibits:

68.1. **POL00123148;**

68.2. **POL00123147;**

68.3. **POL00108247;**

68.4. **POL00113111;**

68.5. **POL00127601;**

68.6. **POL00112974;** and

68.7. **POL00116944.**

69. I confirm that I have reviewed those exhibits and they have informed my answers to the below questions. I shall make specific references to exhibits where necessary, to explain my answers.

70. The Inquiry has asked me to confirm on what matters advice was sought from Cartwright King during my assignment with POL. To the best of my knowledge, and from reviewing the Inquiry exhibits provided to me, Cartwright King were

engaged by POL to advise in relation to issues regarding criminal prosecutions, such as disclosure and the preparation of criminal cases. My understanding is that Cartwright King were effectively the default external advisory firm for any criminal related matters.

71. The Inquiry has asked me to confirm why such advice was sought. As per para. 15, POL's criminal prosecution workstream was not part of my role and did not materially affect the administration of the Scheme. I cannot comment further on why POL sought advice from Cartwright King.
72. The Inquiry has asked me to confirm what role I had in briefing and communicating with Cartwright King. I refer again to para. 15 and my answer at para. 71; this was not part of my role.
73. The Inquiry has asked me to confirm who was responsible for the information provided to Cartwright King. I refer again to para. 15. I would assume that responsibility for instructing Cartwright King, including what information would be passed to them, was primarily handled by Jarnail Singh and potentially with input by Chris Aujard or Rodric Williams (as the other in-house POL lawyers).
74. The Inquiry has asked me to confirm how it was decided what information would be provided to Cartwright King. As per my previous answers, this was not part of my role and I can only assume that it would have been discussed and agreed by POL's in-house legal team.
75. The Inquiry has asked me to summarise my understanding of any advice that POL received from Cartwright King during my assignment with POL. I refer to

paras. 16 and 17, in relation to my inability (since October 2014 and for the purposes of preparing this statement) to access my POL laptop or email account. I also refer to para. 15, whereby POL's criminal prosecution workstream (to which, I understand, Cartwright King was predominantly instructed to advise upon) was not part of my role. I cannot therefore comment, in any complete or analytical sense, on the advice that POL received from Cartwright King.

76. For the purposes of providing this statement, I have reviewed **POL00006798**. I refer to my answer at para. 63, whereby the advice pre-dated by assignment with POL and I do not have any recollection of seeing that advice during my time with POL. My understanding of that advice from reviewing it now is that it relates to POL's obligations of disclosure, as a prosecuting body, and issues relating to POL's expert witness evidence (Gareth Jenkins).
77. The Inquiry has asked me to confirm how POL responded to any advice it received from Cartwright King. I refer to my previous answers; I am not able to comment upon how POL responded, as it did not fall within the scope of my work on the Scheme.
78. The Inquiry has asked me to confirm what use was made of any advice received from Cartwright King. I refer to my previous answers; POL's criminal prosecution workstream was separate and distinct to the Scheme and therefore I cannot comment on how it was used within that workstream. I assume that it was considered by POL's in-house legal team and used to inform decisions relating to criminal prosecutions.

79. The Inquiry has asked me to confirm to whom the content of any such advice was communicated. I cannot comment upon a full distribution list for the Cartwright King advice at POL. I would say that, from my experience within POL, the distribution of documents relating to criminal matters and any detailed discussion of those matters, was quite tightly controlled by POL. I can also say that I do not recollect Cartwright King advice being regularly passed to, or discussed with, me. This is one of the reasons that I say I cannot readily recollect seeing the 15 July 2013 advice (**POL00006798**) and why I am able to distinguish the management of those prosecutions, from my work on the Scheme.

Brian Altman QC

80. In responding to this topic, and in order to address the Inquiry's questions, the Inquiry has asked me to consider the following exhibits:

80.1. **POL00021750**; and

80.2. **POL00040254**.

81. I confirm that I have reviewed those exhibits and they have informed my answers to the below questions. I shall make specific references to exhibits where necessary, to explain my answers.

82. The Inquiry has asked me to comment on what matters was advice sought from Brian Altman QC during my assignment with POL. My understanding is that Brian Altman QC was utilised by POL to provide a more senior level of external legal advice, in relation to issues that carried particular complexity,

sensitivity and / or risk. My understanding is that the engagement of Brian Altman QC was considered to be an “escalation” of any issues, which were considered beyond either Cartwright King or Bond Dickinson, or where a QC’s advice was required.

83. The Inquiry has asked me to confirm why his advice was sought. I cannot comment upon every occasion that POL instructed Brian Altman QC to provide advice. In relation to the two exhibits which have been provided to me:

83.1. **POL00021750** relates to a query arising from a Second Sight case report, prepared in relation to a specific SPM case within the Scheme and a potential communication issue, which could arise where an SPM did not have a dedicated telephone line for the Horizon system (i.e. they used the telephone line for multiple purposes). The Second Sight report concluded that, in that particular case, the communication issues arising from multiple usages of the telephone line, did relate to losses at that particular branch. Brian Altman QC was asked to advise upon the disclosable status of the report and comments upon the evidential basis for Second Sight’s assertion; and

83.2. **POL00040254** relates to a query relating to how criminal cases (i.e. those where POL had already secured a conviction) would / could be appropriately mediated and “settled” within the Scheme. The query had arisen from a proposal by Sir Anthony Hooper (Chair of the Scheme’s Working Group) relating to the treatment of those criminal cases within the Scheme. Brian

Altman QC effectively advised that criminal cases should not be mediated and / or settled under the Scheme.

84. The Inquiry has asked me to confirm my role in briefing and communicating with Brian Altman QC. To the best of my knowledge and recollection, I did not have any role in briefing or communicating with Brian Altman QC.
85. The Inquiry has asked me to confirm who was responsible for the information and documents provided to Brian Altman QC. From the exhibits provided to me, the instructions in those two instances were led by Andrew Parsons of Bond Dickinson (**POL00021750**) and by Rodric Williams (**POL00040254**). My understanding and recollection is that both Rodric Williams and Chris Aujard had the primary line of communication with Brian Altman QC and ultimately decided when, why and how he was instructed.
86. The Inquiry has asked me to confirm how it was decided what information would be provided to Brian Altman QC. I refer to my answer at para. 85 above.
87. The Inquiry has asked me to summarise my understanding of the advice POL received from Brian Altman QC during my assignment with POL. I refer to my answer at para. 82 above.
88. The Inquiry has asked me to confirm how POL responded to the advice received from Brian Altman QC. Generally, my view is that POL took the advice received from Brian Altman QC seriously and afforded it due weight

and attention. His advice (**POL00040254**) on the handling of criminal cases within the Scheme was used to inform further discussions with Sir Anthony Hooper and the Scheme's Working Group, in relation to those cases. Whilst the advice (**POL00021750**) relating Second Sight's case review arose from work they (Second Sight) conducted for the purposes of the Scheme, the main thrust of the advice received by POL related to their disclosure obligations as a prosecutor, which (as per para. 15) was therefore outside of my remit.

89. The Inquiry has asked me to confirm what use was made of any advice received from Brian Altman QC. I refer to my answer at para. 88 above.

90. The Inquiry has asked me to confirm to whom the content of any such advice was communicated. I refer to my answer at para. 85. My understanding is that the direct lines of communication, both for instructing and receiving advice from Brian Altman QC, was via Rodric Williams and Chris Aujard. I cannot comment upon the full distribution list for any advice that was received. I assume that it was distributed appropriately within POL, dependent on the content. The reason that I was copied into the two advices referred to at para. 83, is that they related to (in part), or arose from, the administration of the Scheme and discussions within the Working Group.

Linklaters

91. In responding to this topic, and in order to address the Inquiry's questions, the Inquiry has asked me to consider the following exhibits:

91.1. **POL00074348**;

91.2. **POL00021989**;

- 91.3. **POL00027696;**
- 91.4. **POL00021991;**
- 91.5. **POL00022083;**
- 91.6. **POL00105529;**
- 91.7. **POL00022116;**
- 91.8. **POL00022093;**
- 91.9. **POL00022117;**
- 91.10. **POL00116523;**
- 91.11. **POL00116524;**
- 91.12. **POL00116548;**
- 91.13. **POL00127347;**
- 91.14. **POL00006557;**
- 91.15. **POL00022208;**
- 91.16. **POL00021800;**
- 91.17. **POL00022227;** and
- 91.18. **POL00022231.**

92. I confirm that I have reviewed those exhibits and they have informed my answers to the below questions. I shall make specific references to exhibits where necessary, to explain my answers.

93. The Inquiry has asked me to confirm on what matters advice was sought from Linklaters during my assignment with POL. The advice obtained from Christa Band (**POL00105529**) was the main piece of advice sought from Linklaters during my assignment with POL. Similar to my answer at para. 82, in respect

of Brian Altman, Linklaters were engaged to provide more specialised / complex advice, at a time where there were a number of significant workflow issues within the Scheme. The advice was obtained for the purposes of briefing the POL Board on those issues and to try and agree a way forward.

94. The various workflow issues which primarily resulted in the Linklaters advice are summarised at a high-level (by me) at **POL00105529** (page 28). There were growing concerns with the significant administrative cost of running the Scheme (both in terms of POL's own costs and also the costs of covering SPM representation within the Scheme), the significant "expectation gap" which had arisen (see para. 95) between the positions of POL and SPMs within the Scheme, and the significant amount of management resource that POL was dedicating to the Scheme.
95. The "expectation gap" was, broadly speaking, the difference in value between the claims being presented by SPMs within the Scheme (which were significantly higher than had ever been expected) and: (i) the value of claims that POL had been expecting to receive; and (ii) in light of POL's primary position within the mediation (i.e. that there were no systemic issues with Horizon), the amount at which POL would seek to "settle" (by way of financial compensation) those claims. POL was conscious that any financial compensation to SPMs would, in reality, be made using public finances and therefore there was a significant sensitivity around this. Equally, it was recognised that, due to the size of SPM claims, any offer of what would likely

be perceived as a “token” payment to SPMs could be seen as derisory and antagonise the SPMs.

96. My note at **POL00105529** (page 28) also sets out the secondary concern which had resulted in the Linklaters advice, namely concerns around the quality of Second Sight’s case reviews within the Scheme and also the speed at which those reviews were being completed. I shall address both points separately. In terms of concerns around “quality” I would like to explicitly clarify that this was not a concern borne out of any inherent disagreement with the content of Second Sight’s case reviews, insofar as they may be generally supportive of an SPM’s position as opposed to POL’s. The concern was related to the quality of the work itself, in terms of the purpose for which Second Sight’s case reviews were required: to provide an evidential basis for any conclusions they reached and to, where possible, narrow the issues in dispute between POL and any respective SPM within the scheme. Second Sight’s case reviews, generally, were not achieving those outcomes and were therefore not assisting in progressing cases through the Scheme. In terms of concerns around speed, it was recognised that there were only two Second Sight investigators (subsequently three) compared to a significant number of cases within the Scheme. Due to that capacity issue, the case reviews were not being progressed in-line with anticipated timescales, which was further resulting in the Scheme’s stagnation (with clear potential repercussions at frustrating the JFSA and external stakeholders with an interest in the progression and resolution of cases within the Scheme, such as MPs).

97. The Inquiry has asked me to confirm why such advice (from Linklaters) was sought. I refer to my answers at paras. 92 - 96 above.
98. The Inquiry has asked me to confirm what role I had in briefing and communicating with Linklaters. Compared to POL's engagement with other external solicitors (Bond Dickinson and Cartwright King), I did play more of an active role in the instruction of Linklaters. This is because the instruction and advice being sought was directly related to the administration of the Scheme and arose out of issues that were impacting that project. As can be seen from **POL00074348**, I sent Linklaters a Scheme mediation case on 28 February 2014, for consideration as part of their advice. **POL00021989** also demonstrates my involvement with Linklaters to produce a "workplan" for their advice, to ensure that it addressed all of the relevant issues required. Generally, I can recall assisting POL in gathering relevant documents and information that were relevant to the scope of Linklaters advice (**POL00021991** – shows me obtaining relevant formal pieces of advice from Bond Dickinson, which were relevant to the Linklaters advice). I also recall collating comments from others within POL (Belinda, Chris) to agree and finalise the scope of the Linklaters advice.
99. The Inquiry has asked me to confirm who was responsible for the information and documents provided to Linklaters. I refer to my answer at para. 98. Chris Aujard was leading on Linklater's engagement. I recall that Chris and Belinda were primarily responsible for identifying what would be sent. From the exhibits referred to above, I did have a line of communication with Linklaters

and sent various information / documents. However, as can be seen from **POL00021991**, I was reliant upon others (in that case Bond Dickinson) to identify and confirm what the relevant information / documents were.

100. The Inquiry has asked me to confirm how it was decided what information would be provided to Linklaters. I refer to my answer at para. 99.
101. The Inquiry has asked to confirm why Linklaters were only provided with 10 spot reviews and 4 cases for preparation of the legal issues report. To the best of my knowledge and recollection, I believe that this was because there were only 10 spot reviews and 4 cases with a suitably complete document set for Linklaters to review. I can explicitly confirm that there was no conscious intention, on my part at least, to withhold any relevant information / documents relating to particular cases from Linklaters. POL needed the Linklaters advice to appropriately address the issues and therefore it was acknowledged that Linklaters required the necessary information / documents to provide a robust advice.
102. The Inquiry has asked me confirm why Linklaters were not instructed to contact Fujitsu. I refer to my answer at para. 99. Chris Aujard was leading Linklaters instruction. I am not aware of whether there was any explicit instruction for Linklaters not to contact Fujitsu. I also refer to my answer at para. 39, whereby I did not have any lines of communication with Fujitsu. Generally, given that the scope of Linklaters advice primarily related to issues affecting the administration of the Scheme (to which Fujitsu was not a party), I did not (and do not) have any concerns that Linklaters' advice was provided

without having contact to Fujitsu. I do not believe that such contact would have had a material effect upon what Linklaters were being asked to advise upon.

103. The Inquiry has asked me to summarise my understanding of each piece of advice POL received from Linklaters during my assignment with POL.

103.1. **POL00105529.** As per my answer at para. 92, this was the main advice received from Linklaters. The advice confirmed that the contractual relationship between POL and SPMs was such that SPMs did not have an explicit right to consequential losses (consequential losses forming the main basis of the high values of SPM claims within the Scheme, resulting in the “expectation gap” – see para. 95). The Linklaters advice confirmed that the key factual issue facing POL, and its position within the Scheme, was to what extent Horizon could be said to be reliable and whether there were, in fact, any defects which could be said to have been causative of SPM losses. Linklaters made the point that this fundamental question had not been satisfactorily addressed, and that *“it would be far more satisfactory were there to be a reasoned report as to why Horizon is thought to be working properly”* and that *“Second sight should have produced a report which clearly and objectively sets out what is known about Horizon at a level of detail which can then be used as a baseline in any individual case where the complaint is that Horizon was not working properly”*. Linklaters also advised in relation to the treatment of cases within the Scheme where POL had previously secured a civil judgment and / or criminal conviction. Linklaters view (which POL was already aware of) was that there was an inherent risk in proceeding to mediate and “settle” those cases, both in relation to what

that could mean for the potential safety of any of those convictions, and also a perceived acceptance that there were, in fact, issues with Horizon.

103.2. **POL00022093**. Linklaters provided a short follow-up piece of advice on 28 March 2014, providing an outline of what a further report on Horizon should include. This relates to their comment in the previous advice about what they considered to be missing and what Second Sight had failed to provide. Linklaters confirmed that the report should be prepared by an expert with sufficient independence from POL and effectively comprise of a comprehensive analysis of Horizon as a system (how it worked, how it was used), together with consideration and analysis of the defects being alleged by SPMs.

103.3. **POL00022117**. Linklaters provided a further advice on 31 March 2014, setting out suggested solutions for the future operation and direction of the Scheme. The advice identified four main risk areas for POL, namely: the financial costs associated with the risk of having to meet individual claims; the costs of the applicants and Second Sight; the external communications and reputational issues associated with not settling claims; and the external communications, legal and reputational issues associated with settling claims. Various options were set out for POL's consideration, in light of those risk areas, including: to close the Scheme and decline to mediate any cases; amending the Scheme to clarify that cases with a criminal conviction / civil judgment fell out of the Scheme; formalising and regularising the terms upon which Second Sight were instructed – or, alternatively, terminating Second

Sight's engagement; proceeding with the advice provided in **POL00022093** to instruct and obtain a new, full and objective report into the Horizon system; consideration of a "standard" compensation offer (effectively, an ex-gratia payment) in relation to SPM cases within the Scheme, regardless of their legal merit; and reviewing the effectiveness of the Scheme's Working Group and placing POL more in control of that group.

104. The Inquiry has asked me to confirm how POL responded to the advice received from Linklaters. It was discussed at POL Board level and afforded considerable and serious attention. As my statement will go on to address, the Board went on to instruct Deloitte to prepare an "assurance" report relating to Horizon and steps were taken to regularise the scope of Second Sight's engagement. The terms of reference for the Scheme's Working Group were revisited and ultimately the POL Board did not make a decision to entirely terminate the Scheme. I was not present at the relevant POL Board meetings. However, my understanding and recollection is that the POL Board were respectful of Linklaters' advice, however chose not to proceed with all of the recommendations relating to the Scheme, which flowed from their consideration of the advice.
105. The Inquiry has asked me to confirm what use was made of any advice received from Linklaters. I repeat my answer at para. 104. In relation to Scheme cases where there was a criminal conviction, a decision was taken whereby these would not be stripped out of the Scheme, as suggested by Linklaters as a potential option. This was not seen as a viable course of action

due to inevitable negative reception that would be received from both SPMs and MPs – it would have entirely undermined one of the reasons that the Scheme had been implemented. A decision was made to retain those cases within the Scheme, such that they were properly investigated and discussed, but without proceeding to mediation. This decision is recorded in the Project Sparrow Sub-Committee meeting minutes at **POL00006565** (pages 3 and 4). I would also note that Sir Anthony Hooper (Scheme Working Group chair) was also in agreement that due regard should be given to any relevant Court judgments, where they were present within any Scheme cases.

106. The Inquiry has asked me to confirm to whom the content of Linklaters advice was communicated. As per my previous answers, the advice was obtained in order to advise the POL Board. Where decisions were made by the Board, based upon the advice, they were cascaded down to the relevant individuals to be actioned. I cannot confirm the full dissemination or communication of the advice.

Deloitte

107. In responding to this topic, and in order to address the Inquiry's questions, the Inquiry has asked me to consider the following exhibits:

- 107.1. **POL00105528**;
- 107.2. **POL00006565**;
- 107.3. **POL00116502**;
- 107.4. **POL00116523**;
- 107.5. **POL00028062**; and

107.6. **POL00116578.**

108. I confirm that I have reviewed those exhibits and they have informed my answers to the below questions. I shall make specific references to exhibits where necessary, to explain my answers.

109. The Inquiry has asked me to set out in full everything I can recall about the discussion that took place during the Sparrow Sub-Committee meeting on 9 April 2014 in relation to instructing Deloitte. I have reviewed the minutes of that meeting (**POL00006565**). I note that the discussion regarding instructing Deloitte is set out under the heading "Updated on Horizon On-line HNG-X ("Horizon") Assurance Work. It refers to a "Part 1" instruction of Deloitte to consider and assess the control framework within which Horizon operates, as a largely desk-based exercise (i.e. not a comprehensive examination of the system itself, as envisaged and recommended by Linklaters, which would be considered as a "Part 2" exercise). The minutes reiterate the position that POL had adopted throughout, based upon Second Sight's interim report from July 2013, whereby no wide-spread systemic faults had been identified within Horizon. On that basis, the Part 1 phase of work from Deloitte was considered suitable for providing POL with the necessary assurances it required. Part 2 was considered a non-essential piece of work at that stage, the need for which should be considered as and when Part 1 had been completed. It was agreed for the Part 1 assurance work by Deloitte to be considered and agreed by the POL Board, at their subsequent meeting. It was also agreed for the Chief

Information Office (“**CIO**” – Lesley Sewell) to review the outcomes of Part 1 and update the Sub-Committee on whether Part 2 was required.

110. Beyond the meeting minutes referred to above, I do not directly recall much more from this particular meeting. Deloitte were instructed to carry out the Part 1 assurance exercise, as agreed. I do not recall any hesitancy or unease on behalf of the POL team in proceeding to instruct Deloitte; it was considered to be logical follow-on from the advice received from Linklaters.
111. The Inquiry has asked me to confirm my understanding for the reason for POL instructing Deloitte. I refer to paras. 103.2 and 109. My understanding is that POL were acting upon the advice provided by Linklaters, to obtain further assurances in relation to the Horizon system.
112. The Inquiry has asked me to confirm what role, if any, I had in briefing and communicating with Deloitte. To the best of my knowledge and recollection, I played little or no role in instructing Deloitte. Overall control of Deloitte’s engagement was managed by Chris Aujard, supported by Rodric Williams with day-to-day contact with Deloitte. I note from **POL00028062** (page 64) that Deloitte acknowledge that their POL client contacts are Rodric Williams and Belinda Crowe. Also, **POL00028062** (page 61) confirms that Deloitte’s letter of engagement was sent in Chris’ name. On the same exhibit page. Deloitte set out their definition of the POL “Engagement Team”; I am not referred to.

113. The Inquiry has asked me to confirm who was responsible for deciding what information and documents would be provided to Deloitte and how those decisions were made. I refer to my answer at para. 112. My recollection is that this was entirely dealt with by Chris, Rodric and Belinda, in-line with Deloitte's confirmation of their POL client contacts and Engagement Team.
114. The Inquiry has asked me to confirm how POL responded to the report produced by Deloitte. In short, my recollection and understanding is that POL's response was negative. This is supported by the fact that **POL00028062** is version 16 of the draft Deloitte report (i.e. significant and repeat revision had been required). Chris Aujard was not happy with the work that had been done. I cannot recall if the Deloitte report was ever finalised. Fundamentally, the Deloitte report did not provide the level of assurance that POL were seeking in relation to Horizon. It was heavily caveated and did not provide POL with any basis for clarifying its position on Horizon, or deal with the issues advised upon by Linklaters.
115. The Inquiry has asked me to confirm what use was made of the report produced by Deloitte. I refer to para. 114, whereby I cannot recall if the report was ever finalised. POL had wanted, and been expecting, a piece of work that provided the necessary assurances on the Horizon system. The Deloitte report did not provide that level of assurance. I cannot recall what, if any, real use was made of the Deloitte report; it did not materially change POL's position with regard to Horizon.

Dissemination of Advice and Reviews

116. The Inquiry has asked me to consider **POL00116502** and Belinda Crowe's request for me to work on a list of tasks, including a "*Paper to be produced for the next Sub-Committee setting out approaches to disseminating the Horizon report from Deloitte and the essence of the legal opinion from Linklaters to advisors, applicants and MPs including action planning and comms and stakeholder engagement required*".
117. I confirm that I have reviewed that exhibit and it has informed my answers to the below questions.
118. The Inquiry has asked me to set out in detail the work I carried out on that task, the decision-making involved, and the substance of the paper that was produced. I exhibit at **WITN09780101** a PA invoice cover letter from 6 May 2014, sent to Belinda Crowe at POL, signed by the PA Partner in Charge of the POL assignment. I do not know if this document has been previously disclosed to the Inquiry, by POL. The letter confirms that I did produce a Sub-Committee board paper dealing with the "Dissemination of the Linklaters advice and Deloitte report". I therefore acknowledge that I completed this piece of work. However, the report itself has not been produced to me as an exhibit by the Inquiry. I refer to paras. 16 – 18 of this statement. Given the length of time which has passed, I do not have any direct recollection of the paper I produced. It has not been produced to me as an exhibit and I have no means of accessing the POL laptop (or email account) on which I would have completed the piece of work. Without having sight of further materials, I regret that I cannot assist the Inquiry any further in relation to this question.

119. The Inquiry has asked me to confirm the approach taken by POL to disseminating the advice and reports received from Cartwright King, Brian Altman QC, Linklaters and Deloitte both internally within POL and externally to other organisations and individuals outside the company, including in particular Second Sight, the Working Group, and MPs and ministers.

120. In each of the above sections, I have spoken about my knowledge and recollection of how and to whom I understand various advices and reports to have been disseminated and communicated. In general terms, I can say that POL were very careful and deliberate in how and to whom professional advice was disseminated and communicated. This was on the basis of not inadvertently waiving privilege in any of the documents. In that context, given I was not a POL employee, decision-making regarding the dissemination and communication (in terms of potential waiver of privilege) did not and could not rest with me; I did not have the authority to do so.

121. In terms of the specific advice and reports of various parties, and the external parties, which the Inquiry has asked me about:

121.1. Cartwright King. I refer to para. 79;

121.2. Brian Altman QC. I refer to para. 90;

121.3. Linklaters. I refer to para. 106;

121.4. Deloitte. I refer to paras. 114 and 115;

121.5. The Working Group. I do not believe that any of the above advices or reports were provided wholesale to the Working Group. They would have been used to inform engagement and dealings, where the content related to the administration of the Scheme (e.g. Linklaters). I reiterate my comments about POL not wanting to inadvertently waive privilege;

121.6. Second Sight. I reiterate my comments about POL not wanting to inadvertently waive privilege. I cannot see any basis upon which legal advice being obtained by POL would have been shared with Second Sight; and

121.7. MPs and ministers. I reiterate my comments about POL not wanting to inadvertently waive privilege. I cannot speak as to how (and with reference to what information / documents) POL briefed and updated MPs or ministers.

PROJECT SPARROW

122. In responding to this topic, and in order to address the Inquiry's questions, the Inquiry has asked me to consider the following exhibits:

122.1. **POL00030694;**

122.2. **POL00027482;**

122.3. **POL00099977;**

122.4. **POL00100003;**

122.5. **POL00130507;**

122.6. **POL00116277;**

122.7. **POL00006565;**

122.8. **POL00105528;**

122.9. **POL00108430**;

122.10. **POL00116502**;

122.11. **POL00116576**;

122.12. **POL00116579**;

122.13. **POL00116580**;

122.14. **POL00006571**; and

122.15. **UKGI00002375**.

123. I confirm that I have reviewed those exhibits and they have informed my answers to the below questions. I shall make specific references to exhibits where necessary, to explain my answers.

124. The Inquiry has asked me to set out everything I know about the background to Project Sparrow, including what it was, how it was established, why it was established, its management structure and reporting lines, its terms of reference, its objectives and how POL sought to deliver those objectives.

125. I refer to para. 4 of my statement, whereby my assignment with POL was between December 2013 and October 2014. The background and establishment of Project Sparrow pre-dated my assignment with POL. A number of the exhibits produced to me (**POL00030694**, **POL00027482** and **POL00099977**) also pre-date my assignment with POL.

126. Notwithstanding the above, I provide the following answers to the Inquiry based upon my knowledge during the time of my assignment with POL.

127. Based upon **POL00030694**, which is dated November 2013, Project Sparrow appears to have initially been set up as a form of umbrella project to cover a range of workstreams, including the Scheme. I note from **POL00105528** (page 5) that the Scheme had been established in August 2013. I cannot comment upon when Project Sparrow was first established or the full background. I note from **POL00027482**, which also pre-dates my assignment with POL, that *“Project Sparrow as initially conceived comprised two main initiatives, both of which were launched in response to the Second Sight Report released in 2013”*. The first of those initiatives was the Scheme and the second was the business improvement programme.
128. From the point of my assignment with POL in December 2013, reference to Project Sparrow was de facto a reference for the Scheme (from my perspective at least). The other workstreams (criminal prosecution review and business improvement programme) were not part of Project Sparrow / the Scheme, during the time that I was involved. I have previously explained that I had no involvement in those workstreams in any event.
129. The business improvement programme was led by Angela van den Bogerd and I would assume that it was progressed under separate governance when Belinda was asked to lead the Scheme project. There was a degree of interface between the workstreams, as findings from the Scheme may produce relevant issues to be considered and implemented by the business improvement programme, but the managing of any delivery under that workstream was led by Angela van den Bogerd; I did not have any involvement in that workstream. The Project Sparrow / Scheme Sub-Committee Board did

receive periodic updates on the delivery of the business improvement programme, but this was for information purposes only.

130. It may be helpful to add that my direct POL client, Belinda Crowe, preferred to refer to the project as the Scheme, as opposed to Project Sparrow. My recollection is that she believed Project Sparrow lacked clarity (in terms of what it was dealing with). I also adopted this protocol during my assignment with POL. I believe that the origin of the name "Project Sparrow" was from a POL legacy naming convention that they used for different projects.
131. In terms of management structure, I refer to the meeting minutes at **POL00006565**. There was a Project Sparrow Sub-Committee, chaired by Alice Perkins. I was part of the Sub-Committee, in my remit as Programme Manager for the Scheme. Although the minutes refer to "Programme Manager, Project Sparrow", this was not a different role or function. The Sub-Committee reported to the full POL Board, both on a formal and informal basis, and primarily through Paula Vennells, Alice Perkins and Chris Aujard. I was involved in the preparation for those briefings, where they included issues arising from the administration of the Scheme.
132. The terms of reference for the Project Sparrow Sub-Committee are as set out at **POL00105528** (page 2).
133. In terms of the objectives of Project Sparrow and how POL sought to achieve them, I refer to my previous answers in relation to the different workstreams that initially fell within it and also my involvement from December 2013 onwards. From my perspective, as explained at para. 128, Project Sparrow

was de facto the Scheme. On that basis, the primary objective of Project Sparrow was the administration and progression of the Scheme. In doing so, and as per **POL00006571**, Project Sparrow (and POL) had three fundamental principles that it wished to pursue and achieve through the Scheme, namely: (i) to gain a fuller understanding of the facts; (ii) to ensure a fair outcome; and (iii) to highlight lessons learned so that improvements can be made to business processes.

134. The Inquiry has asked me to consider **POL00030694** and explain where, if at all, my role with POL fitted within the scope and / or resources for Project Sparrow. I reiterate that this document pre-dated my assignment with POL. Notwithstanding that position, and with reference to the bullet points set out at **POL00030694** (page 2), in my role as Programme Manager for the Scheme (and Project Sparrow – ostensibly the same role), I provided secretariat support, I assisted with the creation and implementation of Scheme policy, I provided management services for the delivery of the Scheme, I carried out project management and administration tasks, I supported Sophie Bialaszewski with the preparation of some external communications, and I was involved generally with Scheme operations in terms of optimising the mediation process and process mapping. I refer to **POL00138077** (specifically, page 11 of that document), which sets out the scope of the PA proposal for working on the Scheme.

APPOINTMENT OF SECOND SIGHT

Appointment, Terms of Reference, and Terms of Engagement

135. In responding to this topic, and in order to address the Inquiry's questions, the Inquiry has asked me to consider the following exhibits:

135.1. **POL00096576;**

135.2. **POL00096615;**

135.3. **POL00117119;**

135.4. **POL00099977;**

135.5. **POL00100123;**

135.6. **POL00100165;**

135.7. **POL00100166;**

135.8. **POL00100198;**

135.9. **POL00026743;**

135.10. **POL00116305;**

135.11. **POL00100322;**

135.12. **POL00100323;**

135.13. **POL00022146;**

135.14. **POL00022148;**

135.15. **POL00022147;** and

135.16. **POL00061744.**

136. I confirm that I have reviewed those exhibits and they have informed my answers to the below questions. I shall make specific references to exhibits where necessary, to explain my answers.

137. The Inquiry has confirmed that I was involved in the preparation of the Engagement letter for Second Sight in 2014. The Inquiry has asked me, at

that time, what I understood to be the ambit of Second Sight's original role, when first engaged by POL in 2012. I confirm that from publicly available information, together with the exhibits produced to me, Second Sight were originally engaged by POL in response to a number of complaints / cases being raised by SPMs, via MPs, to investigate those complaints / cases and, generally, the functioning of Horizon as a system.

138. The Inquiry has asked to confirm how and why did this role change over the period between that initial engagement and the end of my assignment with POL. I cannot comment upon any changes to Second Sight's role prior to December 2013. From December 2013, given that the Scheme had been implemented and Second Sight formed part of the processes of that project (in that they conducted case reviews of Scheme applicant cases, for consideration and further investigation by POL) I would say that there was an increased focus on maintaining Second Sight's focus on the completion of those Scheme case reviews, as opposed to their wider investigation into the Horizon system as a whole. I should clarify that the change in focus was not (as far as I am concerned) as a result of POL seeking to hinder Second Sight's investigation of Horizon, to prevent them from investigating or potentially identifying BEDs. It is clear from the exhibits, and from my own recollection, that POL was genuinely trying to progress and make a success of the Scheme. That success was dependent, in part, upon the quality and timeliness of Second Sight's case reviews. The shift in focus was in recognition of the fact that cases within the Scheme were being delayed and the project as a whole was at risk of stagnation.

139. The Inquiry has asked me to describe the process of negotiating and determining the terms of the Second Sight engagement letter in 2014, giving particular attention to any terms over which it was difficult to reach agreement and my understanding of the reasons for any such difficulty. I have reviewed **POL00100166**, which is a draft engagement letter to Second Sight which set out POL's proposed focussed scope and terms of engagement. My recollection is that the actual negotiation of the engagement letter was led by Chris Aujard and / or Belinda Crowe.

140. I summarise the following terms as being those on which there was push-back from Second Sight:

140.1. Confidentiality. The engagement letter sought to impose a confidentiality agreement upon Second Sight, such that the information being provided to them in order to conduct case reviews for the purposes of the Scheme should only be used for that purpose and that they were not to engage in any public discussion in relation the information that they were provided with. My understanding of Second Sight's primary push-back in relation to this proposed clause is that it would prevent them from discussing Scheme cases, and their broader investigational findings, with MPs. This is what resulted in the "Side Letter", which I discuss at para. 142 below;

140.2. "Non-compete". The engagement letter sought to restrict Second Sight from being instructed to act against POL, in relation to the information which had

been provided to them for the purposes of progressing their investigation, for a period of two years. This arose out of a general feeling within POL that, despite Second Sight having been engaged by POL to undertake an independent review of Horizon and thereafter to conduct independent case reviews of claims forming part of the Scheme, Second Sight was largely supportive of the positions of SPMs and the JFSA. Without this clause, it would be difficult for POL to continue to openly provide information and access to Second Sight to conduct investigations, if there was the constant threat that Second Sight could terminate their engagement and become instructed by SPMs or JFSA, against POL. The intention of the clause was to provide certainty to the Second Sight's commitment to the Scheme, whilst it was ongoing. Second Sight did not want their ability to act against POL to be restricted, if they wished to do so and felt it was appropriate; and

140.3. Scope of Services. The revised scope of services, as set out at **POL00100166** (page 7), confirmed that Second Sight's role was to be focussed upon delivering services for the advancement of Scheme cases, as opposed to wider investigation of Horizon as a whole or any non-Scheme complaints. I have spoken at para. 32 about the concerns that POL held (and which I shared, in the context of the Scheme) as to the quality and timeliness of Second Sight's work. The revised scope was intended to focus Second Sight on delivering their case reviews, such that the Scheme could be properly administered. My understanding of Second Sight's concern with the revised scope is that they saw it as: (i) a departure from their original engagement, to investigate the wider Horizon system; and (ii) would prevent

them from investigating non-Scheme complaints which they had been requested to investigate, directly by MPs.

141. As per the agreed engagement letter dated 1 July 2014 (**POL00022148**), Second Sight ultimately agreed to the terms being proposed.
142. The Inquiry has asked me to confirm the rationale for the so called "Side Letter" at **POL00022147**. The rationale for the side letter is as per para. 140.1. Second Sight were concerned that the confidentiality clause within the engagement letter would prevent them from continuing to speak to MPs, and particularly James Arbuthnot MP. The side letter explicitly provides an exception to the confidentiality arrangements, to allow Second Sight to discuss the progress of the Scheme, with James Arbuthnot MP. It also states that, where practicable, updates should be shared with the Working Group in advance and presented on an anonymised basis. The rationale for the side letter was therefore to give comfort to Second Sight that they were not being restricted from continuing their line of dialogue with James Arbuthnot MP.
143. The Inquiry has asked me to confirm to whom the engagement letter was disseminated both within and outside of POL. I cannot comment upon the full dissemination both within and outside POL. The Inquiry has also asked me to comment upon any difference in the dissemination of the engagement letter and that of the side letter. I cannot comment on the dissemination of either but am not aware of any attempt to keep the content of the side letter secret or within a tighter circulation. It was a simple side agreement which provided an

exception to Second Sight's confidentiality obligations, to allow them to retain a line of dialogue with James Arbuthnot MP.

144. The Inquiry has directed me to **POL00022146** and asked for the meaning of the statement "*The only restriction was in relation to criminal matters*" and why I wrote this. I did not write that statement; it is Belinda Crowe's statement. My email within the chain was to Belinda and Chris to provide scanned, signed copies of the engagement letter and side letter.

Second Sight Access to Documents and Information

145. In responding to this topic, and in order to address the Inquiry's questions, the Inquiry has asked me to consider the following exhibits:

145.1. **POL00061304**;

145.2. **POL00061744**;

145.3. **POL00021937**; and

145.4. **POL00021933**.

146. I confirm that I have reviewed those exhibits and they have informed my answers to the below questions. I shall make specific references to exhibits where necessary, to explain my answers.

147. The Inquiry has asked me to confirm by what process were decisions made as to the documents and information that Second Sight received and those to which they would be denied access. I refer to my answer at para. 137. Second

Sight's original engagement pre-dated my assignment with POL. I cannot therefore comment on the provision of documents or information (or the extent to which access may or may not have been denied) at any point up to December 2013. From December 2013, my recollection is that all requests from Second Sight were primarily received by Belinda, Angela or POL's in-house legal team (depending on the subject matter). There may have been instances where requests were raised during the Scheme's Working Group, but these would also be progressed by Belinda or someone in the POL legal team (potentially upon advice from external solicitors, where needed). I did not play any role in decision making of what to disclose (or not disclose) to Second Sight, in response to any substantive request relating to Second Sight's investigation. If a Second Sight request related to their role within the Scheme (e.g. to request Scheme related administrative information or documents relating to a particular claim), then I would have dealt with that and provided the relevant material. I was not involved in discussions or decisions regarding criminal cases or any more wide-ranging requests such as seen at **POL00061304**, whereby Second Sight had requested POL's entire legal files. I did not have access to those files and it was not my role to determine how those requests should be responded to. At no point during my assignment with POL, did I seek to deny Second Sight access to any information or documents which properly related to the administration of the Scheme and their role within it. This is demonstrated in **POL00061304**, where after being copied into the original request, I was removed from the chain of follow-up emails, where the request was discussed in more detail between Chris, Belinda, Rodric and Bond Dickinson.

148. The Inquiry has asked me to confirm how, if at all, the approach to providing such materials to Second Sight varied over the time of my assignment with POL. I refer to my answer at para. 147, whereby I was not involved in the decision making relating to Second Sight requests. I also refer to para. 140.3. I am aware, at the same time that the Second Sight engagement letter was being negotiated (particularly the scope of services), of a general attempt to keep Second Sight focussed upon their case reviews within the Scheme, as opposed to wider issues. As I have set out, this was on the basis that there were concerns that Scheme was stagnating and POL needed Second Sight to ensure that they were meeting the timescales required to produce reports on mediation cases.

149. The Inquiry has asked me to confirm what role I had in the negotiation of access to and provision of any such documents and information. I refer to exhibits **POL00021937** and **POL00021933**. This is an example of me providing a note on "Pensions and Allowances "Reintroduction" Fraud" to Second Sight. The note itself confirms that it is related to the Scheme. I did not prepare the substance of that note, given that it contains technical information relating to pensions, fraud and POL systems that were beyond my technical understanding and knowledge. My role in providing that note to Second Sight would have been limited to gathering comments from relevant POL individuals (Chris, Belinda etc) to agree the substance of the document. I may then have been involved in finalising the draft of the note, in terms of

style / layout etc, before providing it to Second Sight (and once it had been otherwise approved by POL).

150. The Inquiry has asked me to confirm which individuals contributed to the decision-making regarding Second Sight's access to such materials; and who was responsible for the final decision. I refer to my answer at para. 147. Ultimate decision-making rested with Chris Aujard or Belinda Crowe. Angela van den Bogerd may also have been involved. As it was not part of my role, I did not have full visibility into the decision-making process. For the requests I was aware of, POL's decision-making was led by Chris or Belinda, potentially informed by external solicitors.

151. The Inquiry has asked me to confirm what policy / guidelines governed the nature and extent of the documents and information provided to Second Sight. I am not aware of a specific policy or set of guidelines, relating to Second Sight disclosure; I never saw one. Insofar as the Scheme, disclosure requests would have been considered in-line with the revised scope of services set out in Second Sight's engagement letter (i.e. was it relevant to their work in the Scheme). Any request would clearly also be subject to the requirements of both the Freedom of Information Act 2000 and the Data Protection Act 2018; however, compliance with that legislation and the extent to which they related to Second Sight's requests was not part of my role and I did not make any final decisions relating to the disclosure (or non-disclosure) of documents or information.

Second Sight's Interim Report – dated 8 July 2013

152. In responding to this topic, and in order to address the Inquiry's questions, the Inquiry has asked me to consider the following exhibits:

152.1. **POL00099063**;

152.2. **POL00022120**;

152.3. **POL00040074**;

152.4. **POL00040077**; and

152.5. **POL00116486**.

153. I confirm that I have reviewed those exhibits and they have informed my answers to the below questions. I shall make specific references to exhibits where necessary, to explain my answers.

154. The Inquiry has asked me to set out the understanding that I had, during my assignment with POL, of:

154.1. The key findings of the interim report. My understanding of the key findings of the report (**POL00099063**) are as set out at para. 8.2 of the document; namely, Second Sight's preliminary conclusions. The report itself is dated 8 July 2013 and therefore pre-dated my assignment with POL. All of the work conducted up to that point, including the information and documents provided to Second Sight in order to reach those preliminary conclusions, also pre-dated my assignment with POL. From POL's perspective, which informed their position as a mediating party within the Scheme, the key finding was that "*we have so far found no evidence of system wide (systemic) problems with the Horizon software*". I also refer to my answer at para. 58.

154.2. The extent to which the report was disseminated within and outside of POL. I refer to my answer at 154.1; the report was issued in July 2013 and my assignment with POL did not commence until December 2013. I cannot comment upon the degree of dissemination within and outside POL. To the best of my knowledge and recollection, it was a freely available document with no sensitivities around its existence. Whilst preparing this statement, I have located an official POL press release¹ in response to the report issued on 7 July 2013. Both the report, and POL's response to it, were discussed openly.

154.3. The extent to which the report was disclosed to SPMs who raised complaints about Horizon (whether or not they were accepted onto the Scheme). I refer again to 154.1, in terms of the report pre-dating my assignment with POL. I also refer to 154.2, insofar as my understanding that the report was a freely available document. My recollection is that it was posted on the JFSA website at some point. I also refer to various answers within this statement (paras. 15, 88) whereby disclosure by POL (and the extent to which any documents triggered POL's duties of disclosure) was not part of my role.

154.4. The interpretation of the report that POL adopted in relation to the concerns that had been raised about issues with Horizon. I refer to para. 154.1. The primary position adopted by POL, both prior to and during my assignment

¹ <https://www.mynewsdesk.com/uk/post-office/pressreleases/post-office-statement-on-findings-of-interim-report-into-horizon-computer-system-1034990>

from December 2013, was to rely upon the preliminary conclusion that no systemic problems had been identified. As per para. 14, that was POL's technical position with regards their role as a mediating party within the Scheme and was not part of my role to analyse or verify. As per para. 11, the extent to which any of the conclusions were (or should have been) progressed as part of the business improvement programme, headed by Angela van den Bogerd, was not part of my role.

154.5. The steps that POL took following publication of the report. I refer again to paras. 154.1 and 154.2. By the time of my assignment with POL in December 2013, the Scheme had been established as a means by which to engage and resolve (where possible) complaints which had been raised by SPMs.

THE INITIAL COMPLAINT REVIEW AND MEDIATION SCHEME ("THE SCHEME")

The Establishment of the Scheme

155. In responding to this topic, and in order to address the Inquiry's questions, the Inquiry has asked me to consider the following exhibits:

155.1. **POL00022120**;

155.2. **POL00030694**; and

155.3. **POL00027482**.

156. I confirm that I have reviewed those exhibits and they have informed my answers to the below questions. I shall make specific references to exhibits where necessary, to explain my answers.

157. The Inquiry has asked me to set out in detail everything I know about the implementation of the Scheme, including, but not limited to, my understanding of:

157.1. Its terms of reference, purpose and objectives. The terms of reference for the Scheme are set out at page 4 of **POL00138077**. My understanding and recollection of the terms of reference for the Scheme are consistent with the information on that page. Generally, the purpose of the Scheme was to create a framework under which SPM complaints would be investigated and, where possible, result in a mediation meeting to try and reach a resolution for that complaint. In terms of the objectives of the Scheme (which, for the avoidance of doubt, had been devised / implemented prior to my assignment with POL), my understanding is that it was POL's attempt to formally respond to mounting public pressure in relation to Horizon and the number of SPM complaints. My understanding at the time was that POL wanted to do the right thing, by properly engaging with the substance of SPM complaints, through a process of investigation and mediation. I also agree that the objectives of the Scheme are accurately set out in the Working Group's terms of reference (**UKGI00002361**) whereby "*the Scheme's overall objective is to try and achieve the mutual and final resolution of an Applicant's concerns about Horizon and any associated issues*" and that it must "*provide a mechanism to investigate proportionately and effectively an Applicant's concerns*";

157.2. The possible outcomes anticipated by POL. I refer to page 6 of **POL00138077**, which sets out POL's "High Level Success Criteria" for the Scheme. The long-term vision for the Scheme had a number of aims, including resolving all of the complaints and retaining public confidence in POL;

157.3. The anticipated timetable for the Scheme. The initial anticipated timescale for the Scheme was to conclude by April 2014. As referred to in various other answers, due to a number of factors, that timescale was extended.

157.4. The identity and role of every independent organisation that POL engaged to assist it with operating the Scheme. I refer to page. 10 of **POL00138077** which sets out all of the parties (which were generating cost to POL) who were involved with the Scheme. While this is a very wide question and I have referred to the majority of these parties already in this statement, however I have provided the following overview:

- a) Bond Dickinson. One of POL's external legal advisers;
- b) Cartwright King. One of POL's external legal advisers (criminal prosecution focus);
- c) Independent Chair. Sir Anthony Hooper, Chair of the Scheme's Working Group and retained to provide independent and respected oversight;
- d) Second Sight. Independent investigatory services;
- e) Mediators (CEDR). Dispute resolution services retained to mediate any Scheme cases;

- f) Fujitsu. POL's source of technical data relating to Horizon, for Scheme cases;
- g) Mediation venue. Self-explanatory;
- h) SPM advisors. POL committed to paying the reasonable costs of SPMs own advisors for the Scheme; and
- i) PA. I refer to paras. 10 and 134;

157.5. Other parties that I recall being involved are Brian Altman QC (see section commencing at 80), Linklaters (see section commencing at 91) and Deloitte (see section commencing at para. 107). Clearly, Alan Bates was involved, on behalf of the JFSA, who sat on the Scheme's Working Group – assisted by Kay Linnell (independent forensic accountant).

158. The Inquiry has asked to consider pages 10 and 11 in **POL00138077** and also **POL00101350**, in which I refer to "*my pa account*". The Inquiry has asked me confirm:

158.1. What was and is my connection with PA. I refer to paras. 2 and 4; and

158.2. Did PA have any role in relation to the Scheme. I refer to paras. 4, 6, 10 and 134.

158.3. In terms of the reference to "*my pa account*" in **POL00101350**, I refer to paras. 16 and 17. I was provided with a POL laptop and email account that was required not to be taken off POL premises. My email in **POL00101350**

was at 19:13, where I assume I was about to leave work for the day. My offer of being available on my PA email account, if needed, reflected the fact that I would not have external access to my POL laptop or email account and that it was possible that the media interest may develop overnight.

The Leadership of the Scheme

159. In responding to this topic, and in order to address the Inquiry's questions, the Inquiry has asked me to consider the following exhibits:

159.1. **POL00138077**;

159.2. **POL00040074**;

159.3. **POL00040075**;

159.4. **POL00040076**;

159.5. **POL00040077**;

159.6. **POL00040078**; and

159.7. **POL00138147**.

160. I confirm that I have reviewed those exhibits and they have informed my answers to the below questions. I shall make specific references to exhibits where necessary, to explain my answers.

161. The Inquiry has asked me to provide details of the assessment of the Scheme and any risks to POL which were identified. The Inquiry has also asked me to describe any steps which were taken to mitigate those risks. The question does not specify if it relates to risks / challenges to the Scheme itself (and the

steps taken to mitigate those risks / challenges) – which the majority of exhibits relate to – or whether it relates to wider reputational risks to POL, and the extent to which those were mitigated. I will address both.

162. As demonstrated by the Key Issues slides in both **POL00138077** and **POL00040078** a number of risks had been properly identified which could have a material impact upon the administration and success of the Scheme itself. These include consideration of points which I have already addressed, such as whether Second Sight had sufficient resources (see answer at para. 138 relating to the timeliness of Second Sight work), delays associated with data requests from Fujitsu, POL's own capacity and capability to progress investigations, and the potential impact of the "expectation gap" (see para. 95) on the Scheme's success. Each of those risks / issues were identified, assessed and the exhibits set out the actions which were identified and assigned, to mitigate.
163. **POL00040075** is a Media Scenario Planning document which, from recollection, had been prepared by Mark Davies (or his team) in his capacity as POL's Communications Director. That document identifies a number of additional risks (albeit there is some cross-over with the previous exhibits) which could eventuate, and consideration of the proposed approach POL would take with the media. The document also sets out the proposed actions to mitigate those risks.
164. The Inquiry has asked me to confirm what key themes were identified in the CQRs (Case Questionnaire Responses) that been reviewed by February 2014. I refer to my answer at para. 24 and reference to **POL00040076**, being

an analysis undertaken by Bond Dickinson on 27 January 2014 relating to the key themes arising from CQRs at that time. I was aware of that analysis and agree with its content as to the position, at that time.

165. In responding to this topic, and in order to address the Inquiry's questions, the Inquiry has asked me to consider the following further exhibits:

165.1. **POL00100032**;

165.2. **POL00138101**;

165.3. **POL00138167**;

165.4. **POL00138176**; and

165.5. **POL00138282**.

166. I confirm that I have reviewed those exhibits and they have informed my answers to the below questions. I shall make specific references to exhibits where necessary, to explain my answers.

167. The Inquiry has asked me to set out the membership of the programme board and the extent, if any, to which it differed from the leadership / management team for the Scheme. There was a difference between membership of the programme board and the leadership / management team for the Scheme, which I explain below:

167.1. As per **POL00138147**, Chris Aujard was the chairman of the programme board. The membership of the programme board is set out in the same document. Prior to the establishment of the programme board, as set out at

POL00100032, there was a Scheme steering group which was chaired by Paula Vennells. The membership of the steering group is set out in the same document. I had very little sight of the steering group, beyond my attendance at that meeting on 16 December 2013, because it had been established prior to my assignment with POL and was replaced by the establishment of the programme board shortly thereafter.

167.2. As evidenced by the programme board minutes provided by the Inquiry, the programme board reported into both the Project Sparrow Sub-Committee of the POL board (see **POL00138176** page 3 - I refer to my answer at para. 131 and also para. 128, whereby my understanding is that Project Sparrow was de facto the Scheme) and also the full POL Board (see **POL00138167** page 2 – minute numbers 4 & 5). In short, the Scheme programme board was the most proximate governance group for day-to-day administration of the Scheme. The overall leadership, management, decision-making (in relation to more complex, strategic, long-term or risk related decisions) and knowledge of the Scheme went as high as the POL Board.

168. The Inquiry has asked me to set out any material changes to the structure and membership of those teams over the period that the Scheme operated. I can only speak for the period between December 2013 and October 2014. In my view, the key material change in structure and membership was moving from a governance group chaired by Paula Vennells (Scheme steering group) to a group chaired by Chris Aujard (Scheme programme board).

169. The Inquiry has asked me to describe the role and work of the Scheme steering group. I refer to my answer at para 167.1 above. The establishment of the steering group pre-dated my assignment with POL and was quickly replaced by the programme board. I would assume that the steering group provided a materially similar function, in terms of providing a means of executive oversight, preliminary discussions on how to administer the Scheme and to review the progression of cases within it. My understanding is consistent with the note produced by Chris Aujard dated 21 November 2013 (**POL00027482**) whereby "*The Steering Group has, however, recently agreed that the Post Office's interests would be better served, and greater focus would be achieved, by separating these activities [Project Sparrow] into two distinct projects with Belinda Crowe being appointed as Programme Director for the first (the mediation scheme) and Angela Van Den Bogerd acting as Programme Director for the second (the BIP) [business improvement programme]*".
170. The Inquiry has asked me to describe the role and work of the Scheme's Programme Board, including a summary of the objectives, discussions and outcomes of each of the meetings that I attended. I refer to my answer at para. 167.2, whereby the role of the Scheme's Programme Board was to provide governance for the day-to-day administration and progression of the Scheme. Its overarching objective was to drive the delivery of the Scheme and the effective management of cases being progressed through it. I have reviewed the exhibits of Programme Board meeting minutes and associated briefing materials. In terms of the discussion and outcomes of each of those meetings,

I confirm that the minutes are an accurate reflection (and consistent with my recollection) of the discussion points and associated actions, where applicable.

Settlement Policy

171. In responding to this topic, and in order to address the Inquiry's questions, the Inquiry has asked me to consider the following exhibits:

171.1. **POL00146797**;

171.2. **POL00027505**;

171.3. **POL00129110**; and

171.4. **POL00040201**.

172. I confirm that I have reviewed those exhibits and they have informed my answers to the below questions. I shall make specific references to exhibits where necessary, to explain my answers.

173. The Inquiry has asked me to set out any knowledge I had about the settlement policy, its origins, who was responsible for it, any use made of it before its withdrawal, and the circumstances and reasons for its withdrawal. I have reviewed the draft settlement policy which is dated November 2013 and is at **POL00027505**. Given the date, its creation pre-dates my assignment with POL. Notwithstanding that position, my understanding and recollection is that it had been prepared by Andrew Parsons from Bond Dickinson. I cannot

comment further on the origin or wider authorship of the document. To the best of my knowledge and recollection, it was never actually signed-off or issued; in that context, it was never formally “withdrawn”, albeit I accept that language is used in the exhibits (by Andrew Parsons, at **POL00040201**). It was not part of my role to authorise or make decisions in relation to any “settlements” for cases within the Scheme; neither did I actually attend any ultimate mediation, where any settlement offers from POL would be made and discussed. I recall that the draft settlement policy was used by POL as a useful starting / reference point for considering potential settlements at mediation, but it was not a definite policy which determined or dictated POL’s position in relation to any prospective settlement.

The Operation of the Scheme

174. In responding to this topic, and in order to address the Inquiry’s questions, the Inquiry has asked me to consider the following exhibits:

- 174.1. **POL00125093;**
- 174.2. **POL00040079;**
- 174.3. **POL00040084;**
- 174.4. **POL00040082;**
- 174.5. **POL00038682;**
- 174.6. **POL00116487;**
- 174.7. **POL00029707;**
- 174.8. **POL00108424;**

- 174.9. **POL00108439;**
- 174.10. **POL00040182;**
- 174.11. **POL00040183;**
- 174.12. **UKGI00002395;**
- 174.13. **POL00061460;**
- 174.14. **POL00116648;**
- 174.15. **POL00116649;**
- 174.16. **POL00021803;**
- 174.17. **POL00074651;**
- 174.18. **POL00108764;**
- 174.19. **POL00061594;**
- 174.20. **POL00021760;**
- 174.21. **POL00124439;**
- 174.22. **POL00075691;** and
- 174.23. **POL00075679.**

175. I confirm that I have reviewed those exhibits and they have informed my answers to the below questions. I shall make specific references to exhibits where necessary, to explain my answers.

176. The Inquiry has asked me to describe how the Scheme operated and also to describe each discrete step in the process by which the cases in the Scheme were dealt with, from application to mediation. During my assignment with POL, I (with the assistance of the other PA individuals assigned to the project) designed and implemented a "Programme Dashboard" for the administration

of the Scheme. Reference to that document (which was effectively an excel spreadsheet) is made in the exhibits, such as at **POL00138077** (page 6), namely a Scheme Programme Board meeting pack dated 17 January 2014. That slide confirms that the Programme Dashboard had been developed and would be capable of producing reporting data / management information, for the next Programme Board meeting. The Programme Dashboard effectively tracked the number and progression of cases through the various stages of the Scheme, to inform general management and workflow. I have not seen a full version of the Programme Dashboard within the exhibits provided to me (and cannot comment on whether it is otherwise in the possession of the Inquiry), but that document would provide the greatest degree of detail on the distinct stages of the Scheme process, from application to mediation.

177. In general terms, an SPM would submit an application to join the Scheme. The initial application would be considered by the Scheme's Working Group for general suitability / eligibility to be dealt with under the Scheme. Where an application / case was considered suitable / eligible, the applicant would be provided with a Case Questionnaire (CQ) to complete, to set out a general overview of their case and the nature of their complaint, for further consideration. Once completed and submitted by the respective applicant, the CQ became a Case Questionnaire Response (CQR). The CQR would be reviewed by Second Sight in the first instance and, once considered to contain sufficient information to allow POL to understand the nature of the complaint and what investigation would be required to address it, it would be considered by the Working Group for acceptance. Once accepted, the CQR was passed

to the POL investigation team (led by Angela van den Bogerd) to produce their own case report. POL's case report would then be passed to Second Sight to prepare a Case Review Report (CRR). The purpose of a Second Sight CRR was to consider the content of the CQR (applicant information), the POL case report (POL investigation) and also to conduct their own investigation into the nature of the complaint and set out their evidential findings, together with a recommendation as to whether they considered the case to be suitable for mediation. Second Sight's CRR would then be considered and discussed by the Scheme's Working Group and whether the case would be sent for mediation, or if further investigatory work was required. The final stage of the process, for those cases where agreement was reached by the Working Group (and by both the SPM and POL as the mediating parties) was mediation.

178. The Inquiry has asked me to confirm how many applications to the Scheme were anticipated when the Scheme began. As per para. 6, the establishment of the Scheme pre-dated my assignment with POL. The initial deadline for applications to the Scheme (18 November 2013 – as per **POL00022120** page 6) also pre-dated my assignment with POL. I cannot therefore definitively comment upon how many applications were anticipated by POL when the Scheme began, but my recollection is that I was informed it was between 50 – 70. I can say that from December 2013 and my assignment with POL, the number of applications which had been received (and which continued to be received) greatly exceeded the numbers which had been anticipated by POL.

179. The Inquiry has asked me to confirm if the number of anticipated applications changed over the period that the Scheme was open. As per my answer at para. 178, the actual number of applications received as at December 2013 had already exceeded POL's expectations on the number of applications. From that point onwards, more applications were received and were also more than had been anticipated.
180. The Inquiry has asked me to confirm how the deadline for applications was set. I refer to para. 178 – both the establishment of the Scheme and the setting of the initial deadline of 18 November 2013, pre-dated my assignment with POL.
181. The Inquiry has asked me to confirm the approach taken for dealing with applications received after the deadline had passed. Notwithstanding the deadline, where applications were received after that point, we would write to the applicant and consider any completed CQR within the Working Group, consistent with any other application (whether received before or after the deadline). I do not recall any instances whereby POL unilaterally refused to accept an application, solely on the basis that the deadline had been missed.
182. The Inquiry has asked me to confirm how applications to the Scheme were investigated. I refer to my overview at para. 177. I cannot comment in terms of the actual mechanics of the POL investigation, to include what other third parties they liaised with (e.g. Fujitsu for technical data or legal input from Bond Dickinson or Cartwright King), as that fell within the remit of Angela Van Den

Bogerd. My recollection is that where an application related to a case where there was an existing criminal conviction, the case underwent an additional legal review by Cartwright King before being investigated by the POL Investigation team.

183. The Inquiry has asked me to confirm how decisions were made as to whether or not to support mediation for a given case. For the avoidance of doubt, whether or not to support a mediation for a given case was a POL decision (i.e. beyond the scope of my remit or authority). My recollection is that Bond Dickinson provided POL with legal advice on potential mediation settlements and I would suspect POL received similar legal advice from Cartwright King in relation to any criminal cases. Fundamentally, my recollection is that it was a legally driven review process. That legal review process would result in a recommendation for a POL mediation position, agreed between Belinda Crowe and Andrew Parsons, for an ultimate decision to be made by one or more of: (i) Chris Aujard; (ii) Paula Vennells; and / or (iii) Angela van den Bogerd.
184. The Inquiry has asked me to confirm what advice was obtained to assist in this determination. I refer to my answer at para. 183.
185. The Inquiry has asked me to confirm who had the final say about the position POL would take regarding each case. I refer to my answer at 183.

186. The Inquiry has asked me to confirm POL's approach to the conduct of the mediations themselves. I refer to my answer at 173; I never attended a mediation. My understanding is that most mediations (if not all) were attended by a POL representative and also a representative from Bond Dickinson.
187. The Inquiry has asked me to explain the role that Fujitsu had in the operation of the Scheme. I refer to para. 35; whereby Fujitsu were not involved in the administration or operation of the Scheme itself and also that lines of communication with Fujitsu were tightly controlled. As per para. 182, my understanding is that Fujitsu were involved in assisting and providing information for the purposes of the POL investigation into Scheme cases, which was a separate workstream.
188. The Inquiry has asked me to describe any contribution sought and obtained by POL from legal advisers at each stage in the operation of the Scheme. I refer to my answer at para. 183. More generally, it is worth making the point (demonstrated by the exhibits) that POL was an organisation that sought and obtained a significant amount of external legal advice. I was not privy to each and every piece of legal advice that was obtained, but POL appeared to have a very "thin" in-house legal model that operated with a high-degree of input and support from a wide range of panel solicitor firms, most notably Bond Dickinson who were the default external legal advisers for the Scheme.
189. The Inquiry has asked me to describe any material changes to the operation of the Scheme, of which I was aware, over the period in which it was in

existence. I can only comment on the period from December 2013 to October 2014. During that time, largely, the operation of the Scheme did not materially change and was executed in broad compliance with the operational overview and Frequently Asked Questions (FAQs) as set out at **POL00105528**, which pre-dated my assignment with POL. I have spoken about the establishment of the Scheme's Programme Board in terms of management, but this did not materially affect the operation of the Scheme itself.

Executive / Board Oversight

190. In responding to this topic, and in order to address the Inquiry's questions, the Inquiry has asked me to consider the following exhibits:

- 190.1. **POL00100032;**
- 190.2. **POL00100165;**
- 190.3. **POL00027685;**
- 190.4. **POL00116277;**
- 190.5. **POL00130509;**
- 190.6. **POL00116348;**
- 190.7. **POL00105529;**
- 190.8. **POL00116241;**
- 190.9. **POL00116240;**
- 190.10. **POL00116562;** and
- 190.11. **POL00108742.**

191. I confirm that I have reviewed those exhibits and they have informed my answers to the below questions. I shall make specific references to exhibits where necessary, to explain my answers.
192. The Inquiry has asked me to describe the nature and extent of the executive oversight that the CEO (Paula), Chairman (Alice) and board (various) of POL exercised over the Scheme. I refer to my answer at para. 167.2. Both Paula and Alice sat on the Project Sparrow Sub-Committee to the Board, where the operation and progress of the Scheme was discussed on a regular basis and, what I would describe as, to a granular level of detail. The basis for the Scheme (i.e. the very existence of complaints) and the Scheme itself (in terms of administrative cost, potential compensatory cost, and associated public relation concerns) was a major corporate risk for POL at that time. The Linklaters advice (I refer to para. 91 onwards) directly related to risks associated with the Scheme and was obtained for the purposes of briefing the POL Board. Christa Band presented that advice, in person, to the POL Board. In summary, in my view, there was a significant degree of executive oversight over the Scheme by Paula, Alica and the POL Board.
193. The Inquiry has asked me to set out my recollections of every meeting that I attended with the CEO and Chairman on the subject of the Scheme. I refer to my answers at paras. 17 and 18; whereby it has been over 10 years since my assignment with POL and I do not have access to my POL laptop / email account (or associated calendar / diary) in order to provide a comprehensive or complete answer to this question. From the exhibits disclosed to me, where there are minutes of a meeting (Steering Group, Programme Board, Sub-

Committee etc) at which I am in attendance with Paula and / or Alice, I believe that those minutes are a fair reflection of what was discussed and what any outcomes were. In terms of the Scheme, Belinda (as Programme Director) had more of a direct line of communication with Paula than I did. I did not have any informal lines of communication with Paula. Any meeting that I did have outside of the formal governance meetings, would have had a defined purpose for briefing or updating her on some aspect of the Scheme (see para. 282 in relation to briefings for Paula's meeting with James Arbuthnot MP). Chris Aujard was primarily responsible for briefing Alice, as that was her preferred way of working (i.e. she had an expectation that she should be briefed, as Chairman, by one of her executives – such as the General Counsel).

Funding

194. The Inquiry has asked me to set out any knowledge I had of the budget of the Scheme, how this changed over time and the reason for any changes. I refer to para. 157.4 and the exhibit reference therein, which set out an initial budgetary assessment. I did not have sight of the overall POL budget cost for the Scheme at any point. This is not unusual, given that my assignment (and PA's involvement to provide external management services to POL) formed part of that budget and was one of a number of external management costs. Generally, I can say that my understanding is that the administrative cost of running the Scheme was substantial and only increased over time. The reasons for those increases were due to delays with the Scheme, the extended duration of the Scheme from initial lifespan, and the widening pool

of external experts who were retained by POL to provide different types of advice at various stages. Notwithstanding that comment, I am not aware of any instance where budgetary restraint by POL had any impact upon the execution or delivery of the Scheme.

195. The Inquiry has asked me to confirm what knowledge I had about any cost concerns regarding the Scheme and what, if any, impact those concerns had on POL's overall approach to the Scheme and decision making in relation to individual cases. To the extent that the Inquiry's question regarding "cost concerns" includes the expectation gap (see para. 95) then there were concerns on that point. The Linklaters advice (see section from para. 91 onwards) provided POL's Board with clarification on the actual legal recoverability of consequential losses which gave rise to the expectation gap (i.e. the cost implication), but did not resolve the gap itself as a significant rift between POL and SPM positions. Separate to that point, in terms of concern over the rising administrative cost of the Scheme (see para. 194 above), there was a significant amount of concern within POL as to size of the costs but I cannot recall any decisions being made as a result of cost concerns that had a material impact on the Scheme's operation during the time of my assignment with POL.

THE WORKING GROUP

Overview

196. In responding to this topic, and in order to address the Inquiry's questions, the Inquiry has asked me to consider the following exhibits:

196.1. **UKGI00002360**;

196.2. **UKGI00002361**; and

196.3. **POL00026641**.

197. I confirm that I have reviewed those exhibits and they have informed my answers to the below questions. I shall make specific references to exhibits where necessary, to explain my answers.

198. The Inquiry has asked me to set out my understanding of the scope of the Working Group. My understanding of the scope of the Working Group is consistent with the terms of reference at **UKGI00002361**. Generally, the Working Group was established to provide independent oversight over the administration of the Scheme and ensure that there was an appropriate level of visibility and transparency in the process, for the benefit of JFSA (Alan Bates) and Second Sight. It was on that basis that POL sought a respected and independent chair for the Working Group; Sir Anthony Hooper, who was a former Court of Appeal judge.

199. The Inquiry has directed me to consider **POL00040078** and explain in what way was “*a different view being taken by JFSA and Second Sight to Post Office*” as to the scope of the Working Group. My recollection is that this comment is linked to my answer at para. 138, in relation to discussions and negotiations around the scope of Second Sight’s work. The question being discussed at the Working Group was whether it would oversee the previous

work being undertaken by Second Sight (i.e. their original scope of engagement, to investigate the Horizon system as a whole) or whether it would be limited to their work on the mediation cases within the Scheme. Clearly, it was the view of JFSA and Second Sight that: (i) that work should continue; and (ii) it should be overseen by the Working Group. This is evidenced at **POL00026641** (page 1), whereby "*Alan Bates raised the issue of the scope of the Working Group and whether the intention was that the Terms of Reference would replace existing documentation particularly but not limited to the 'raising concerns about horizon' documentation*" and that "*JFSA felt the Terms of Reference as drafted were insufficiently broad*". POL's position, as I set out at para. 138, was to try and ensure that Scheme cases were investigated and progressed in an expeditious manner, for the benefit of applicants and all members of the Working Group.

200. The Inquiry has asked me to confirm how, if at all, did the scope of the Working Group change over the period that I was part of it. The membership and chairmanship of the Working Group was consistent throughout my assignment with POL. My view is that the objectives of the Working Group remained broadly consistent with those set out in the terms of reference at **UKGI00002361**. On reflection, I do not recall that paragraph 4.6 in that document – "*manage the administration of the Scheme so as to ensure that the Scheme's processes and procedures are offering value for money for taxpayers*" – was ever really enacted or a point of focus for the Working Group, during my time in it.

Meetings

201. In responding to this topic, and in order to address the Inquiry's questions, the Inquiry has asked me to consider the following exhibits:

- 201.1. **POL00026666;**
- 201.2. **POL00026638;**
- 201.3. **POL00026639;**
- 201.4. **POL00026640;**
- 201.5. **POL00026641;**
- 201.6. **POL00026635;**
- 201.7. **POL00043626;**
- 201.8. **POL00026636;**
- 201.9. **POL00026637;**
- 201.10. **POL00026656;**
- 201.11. **POL00026643;**
- 201.12. **POL00026642;**
- 201.13. **POL00026644;**
- 201.14. **POL00026633;**
- 201.15. **POL00026652;**
- 201.16. **POL00026653;**
- 201.17. **POL00026660;**
- 201.18. **POL00026663;**
- 201.19. **POL00043627;**
- 201.20. **POL00026657;**

- 201.21. **POL00026659**;
- 201.22. **POL00026667**;
- 201.23. **POL00026668**;
- 201.24. **POL00026664**;
- 201.25. **POL00026673**;
- 201.26. **POL00026665**;
- 201.27. **POL00026672**;
- 201.28. **POL00026671**;
- 201.29. **POL00026683**;
- 201.30. **POL00026674**;
- 201.31. **POL00026676**;
- 201.32. **POL00026679**;
- 201.33. **POL00026680**;
- 201.34. **POL00026685**;
- 201.35. **POL00043628**; and
- 201.36. **POL00026684**.

202. I confirm that I have reviewed those exhibits and they have informed my answers to the below questions. I shall make specific references to exhibits where necessary, to explain my answers.

203. The Inquiry has asked me to explain how the Working Group operated. I refer to my answer at para. 177 in terms of how and where the Working Group sat within the Scheme's process itself. In terms of actual operation, I refer to again to **UKGI00002361** and specifically paragraph 6, namely the Working Groups

“Working process”. This is broadly a fair reflection of how the Working Group operated in practice, whereby practices were determined by the Chair, meetings were held at least once a month with further ad-hoc meetings being arranged as and when required, the meetings were to remain confidential to the members of the Working Group unless there was agreement that information could be disclosed, and accurate minutes of the meetings were kept and approved by the Chair. I consider **POL00026660** (page 1) to set out, in my view, a fairly standard agenda for discussion points in each Working Group meeting.

204. The Inquiry has asked me to describe my role within the Working Group and the work I carried out in that role. I supported Belinda Crowe who acted as secretariat to the Working Group. Although I was likely seen as attending on behalf of POL (as a consultant providing services to POL), I was not de facto a “POL representative” within the Working Group. My role was restricted to providing secretariat support to Belinda, or Sir Anthony Hooper as required, and to provide administrative support and updates on the cases being progressed within the Scheme and their current position. I was not a voting member of the Working Group. I would occasionally participate in meetings in order to provide Scheme updates, on a factual basis and with reference to the case tracker. I did not make decisions on the suitability of cases to be included within the Scheme, the suitability of cases for mediation, or what any potential outcome of a mediation would be. Equally, I did not engage with the technical subject matter forming the basis of either POL’s, or an SPM’s, respective position.

205. The Inquiry has asked me to set out what I know about the role and activities of each of the other POL members of the Working Group. As per my answer at para. 204, answering this question requires a degree of nuance to differentiate between POL individuals attending Working Group meetings, and POL individuals who were there as bona fide POL representatives with the authority to speak on behalf of POL as a mediating party and Working Group member (i.e. to exercise POL voting rights). Belinda Crowe attended the Working Group but in her capacity as Programme Director for the Scheme and therefore, similar to my role, largely provided secretarial and administrative support to the Working Group and Chair, and factual case progression updates where required. Actual POL representatives at Working Group meetings varied but, as demonstrated by the various minutes, included Chris Aujard, Angela van den Bogerd, and Rodric Williams – usually supported by Bond Dickinson. That representation made sense, as an interface between POL legal (Chris, Rod) and POL investigations (Angela).

Information provided by POL to the Working Group

206. In responding to this topic, and in order to address the Inquiry's questions, the Inquiry has asked me to consider the following exhibits:

206.1. **POL00040144;**

206.2. **POL00040146;**

206.3. **POL00040151;**

206.4. **POL00040152;**

206.5. **POL00040153;**

206.6. **POL00040154;**

206.7. **POL00124439;**

206.8. **POL00101297;** and

206.9. **POL00040282.**

207. I confirm that I have reviewed those exhibits and they have informed my answers to the below questions. I shall make specific references to exhibits where necessary, to explain my answers.

208. The Inquiry has asked me to describe how decisions were made as to the information that would be provided to the Working Group. I do not fully understand the context and relevance of the exhibits which have been provided to me, in order to answer this question. The majority of the material relates to the preparation of briefing notes, and the notes themselves, to inform POL's position (i.e. POL representatives – Chris, Rod, Angela) at the Working Group, on behalf of POL. They are not papers which were being prepared for the Working Group and, in my view, there is no basis upon which the content should have been shared. Similarly, I expect Alan Bates on behalf of JFSA (potentially in collaboration with Second Sight, on specific issues, and SPMs) to have prepared for meetings and attended on an informed and briefed basis, as to what their position was. This is not unusual. I would equally not expect to have been provided with information from Alan Bates, JFSA or Second Sight as to the basis of their position. Generally, the Working Group would have access to the investigatory work products of both POL and Second Sight (once finalised) and would be provided with full and transparent updates

on the progression of cases through the Scheme and the reasons for any delays. POL's position in relation to any wider points would be relayed during the course of meetings, by an authorised POL representative (Chris, Rod, Angela etc).

209. The Inquiry has asked me to describe how decisions were made as to the position that POL would take on any issues to be determined by the Working Group. POL's position would be informed by any individuals who held relevant information relating to the relevant issue. That information would be collated and considered by Chris Aujard as General Counsel, discussed as appropriate with other senior executives (e.g. Paula, Angela if it related to investigation detail, Mark Davies if there was a substantial PR concern relating to a particular issue), before Chris would make a final decision on the majority of day-to-day issues – potentially with the input and assistance of Rodric and / or Bond Dickinson. I would sometimes be involved in the preparation of materials (i.e. briefing notes) which would assist in that decision making, but that would largely consist of collating relevant information and comments from other POL individuals who had the requisite technical and / or legal knowledge. The only instances where I would offer my own view / recommendation for consideration by Chris would be where any issue related to the administration or operation of the Scheme itself. For example, I would provide my view on the general quality and timeliness of Second Sight work, insofar as the work product expected and required to progress cases through the Scheme or narrow the issues in dispute.

210. The Inquiry has asked me to confirm which individuals had input into any such decision making. Day-to-day decision-making lay with Chris Aujard as General Counsel. Ultimate decision-making on any particularly sensitive issues lay with Paula Vennells, on the advice of Chris. Input into decision-making came from a number of sources, including Angela, Rodric, Bond Dickinson, Mark Davies, Belinda and myself (to the extent set out at para. 209 above).

211. The Inquiry has asked me to confirm who had the final say in any such decision-making. I refer to my answer at para. 210 above.

Communication with Sir Anthony Hooper

212. In responding to this topic, and in order to address the Inquiry's questions, the Inquiry has asked me to consider the following exhibits:

- 212.1. **POL00108268;**
- 212.2. **POL00116305;**
- 212.3. **POL00100322;**
- 212.4. **POL00100324;**
- 212.5. **POL00002329;**
- 212.6. **POL00116536;**
- 212.7. **POL00116544;**
- 212.8. **POL00108528;**
- 212.9. **POL00021844;**
- 212.10. **POL00021803;**
- 212.11. **POL00101053;**

212.12. **POL00040221**;

212.13. **POL00040233**;

212.14. **POL00075193**;

212.15. **POL00065213**;

212.16. **POL00101305**;

212.17. **POL00040263**;

212.18. **POL00040264**;

212.19. **POL00040265**;

212.20. **POL00040266**;

212.21. **POL00040267**; and

212.22. **POL00136853**.

213. I confirm that I have reviewed those exhibits and they have informed my answers to the below questions. I shall make specific references to exhibits where necessary, to explain my answers.

214. The Inquiry has asked me to describe the nature of the communications between POL and Sir Anthony Hooper in respect of both the work of the Working Group and any parallel meetings and communication that took place alongside the activities of the Working Group.

215. In answering this question, I would reiterate that the entire purpose and rationale for appointing Sir Anthony Hooper as Chair of the Working Group, in his capacity as a former Court of Appeal judge, was to provide a recognised and senior level of independent oversight to the Working Group. It was to provide proper assurances to Second Sight, Alan Bates, JFSA and interested

MPs that the Scheme was being scrutinised and arbitrated by a well-respected and nonpartisan intermediary, outside of POL. That remained the position throughout. In my recollection, Sir Anthony Hooper performed his duties expeditiously and impartially.

216. In respect of the Working Group, communications between POL and Sir Anthony Hooper related to the arranging of meetings, agreement and circulation of agendas and minutes, and correspondence relating to cases being considered by the Working Group and within the scheme. **POL00040264** is a good example of this, whereby Sir Anthony Hooper sent a letter to Chris Aujard to provide various Second Sight case review reports.
217. In relation to “parallel meetings and communication”, I can see from the exhibits (**POL00108268**) that in February 2014 a meeting was arranged between Paula Vennells and Sir Anthony Hooper. **POL00100322** is a briefing note for Paula (which I was involved in preparing), to prepare for that meeting. The discussion points are set out at point 6 of that briefing note and entirely relate to the Working Group and administration of the Scheme. There is a further reference at **POL00108528** where I email Sir Anthony Hooper and confirm that Paula and Chris wanted a catch up. I would not categorise any of these instances of communication or meetings as “parallel” or materially beyond the topic of the Working Group. Sir Anthony Hooper deliberately maintained a level of formality with all members of the Working Group. It’s not unusual for members to separately meet with the Chair of a governance group and it does not undermine the integrity of the group or the Chair’s position. It was not an attempt by POL to sway Sir Anthony Hooper. The meetings and

correspondence that I am aware of related to the discussion and resolution of legitimate issues (including the consideration of criminal cases) within the Scheme and the Working Group and potentially to agree agenda points for formal Working Group meetings.

218. The Inquiry has asked me to confirm how frequently representatives of POL met with, spoke with, or corresponded with Sir Anthony Hooper outside of the ambit of the formal Working Group meetings and communication. I am aware of the meetings and correspondence as set out in the exhibits which have been provided to me. I am not aware of the full extent of meetings or correspondence between Sir Anthony Hooper and POL and have no way of checking (I refer to paras. 17 and 18).
219. The Inquiry has asked me to confirm why such parallel communications took place. I refer to my answer at para. 217.
220. The Inquiry has asked me to confirm what knowledge I have of the matters that were discussed on any such occasions. I refer to my answers at paras. 217 and 218. To the best of my knowledge and recollection, all matters discussed with Sir Anthony Hooper would have been in the context of his role as Chair of the Working Group and related to the discharging of his duties as Chair of the Working Group.

Communication with Sir Alan Bates

221. In responding to this topic, and in order to address the Inquiry's questions, the Inquiry has asked me to consider the following exhibits:

221.1. **POL00116500**;

221.2. **POL00116501**;

221.3. **POL00116507**;

221.4. **POL00116521**;

221.5. **POL00040144**;

221.6. **POL00040145**; and

221.7. **POL00021872**.

222. I confirm that I have reviewed those exhibits and they have informed my answers to the below questions. I shall make specific references to exhibits where necessary, to explain my answers.

223. The Inquiry have asked me to set out my recollection of any communication that occurred between POL and Mr Alan Bates, outside the ambit of the Working Group, during my time working on the Scheme. Sir Alan Bates was an applicant of the scheme and therefore there would have been direct communication with him relating to his application. I am not aware of the full extent of the correspondence between Sir Alan Bates and POL and have no way of checking. I see from the exhibits (**POL00116500 and POL00021872**) that following a letter from Sir Alan in April 2014 and a freedom of information request in May 2014, there was communication outside of the ambit of the working group. These were two isolated incidents and I am not aware that any communication took place other than through the Working Group and mediation

224. The inquiry has asked me to confirm what matters were raised by Sir Alan Bates in the communications that occurred with POL, and how POL responded. I refer to my answer at para. 217. In relation to **POL00116500** there was an internal POL discussion that discussed the points raised within the letter. I helped prepare a draft response on behalf of POL and a commentary of the letter was prepared ahead of the 30 April 2014 Working Group meeting. In relation to **POL00021872**, Bond Dickinson and Belinda Crowe drafted response relating to the freedom of information request.

The Response to Second Sight's Findings

225. In responding to this topic, and in order to address the Inquiry's questions, the Inquiry has asked me to consider the following exhibits:

225.1. **POL00006554**;

225.2. **POL00006555**; and

225.3. **POL00004439**.

226. I confirm that I have reviewed those exhibits and they have informed my answers to the below questions. I shall make specific references to exhibits where necessary, to explain my answers.

227. The Inquiry has asked me to summarise my understanding of the findings in Second Sight's Briefing Report Part One. My understanding is that Second Sight's Briefing Report Part One was meant to be a factual description of the

Horizon System within the POL network, including providing background about the operation of the POL systems and the use of Horizon as an accounting piece of software. My understanding is Second Sight's Briefing Report Part One was designed to be helpful factual reference document that could be used by the mediator and parties to mediation as a reference piece. This is noted by Andrew Parson at **POL00006555** (page 3).

228. The Inquiry has asked me to describe POL's response to Second Sight's Briefing Report Part One, and what my contribution to that response was. I refer to my answer at para. 227. POL believed that Second Sight's Briefing Report Part One designed to be helpful factual reference and provided a substantial amount of the content for the report. POL were concerned with some of the unsupported assertions and lack of accuracy. I refer to my answer at para. 23. I did not have the technical expertise to provide any substantive technical feedback, but I suspect I will have had a role in consolidating POL's comments.
229. The Inquiry has asked me to state who else at POL made a contribution to their response to Second Sight's Briefing Report Part One. Belinda Crowe, Angela van den Bogerd, Chris Aujard and Rodric Williams all received the report and would have provided feedback.
230. The Inquiry has asked me to state what legal advice was obtained in respect of POL's response to Second Sight's Briefing Report Part One. As far as I am aware, the report was reviewed by the in-house legal team, Chris Aujard and Rodric Williams, and it was reviewed by Bond Dickinson

231. The Inquiry has asked me to state who had the final say as to the nature and form of POL's response to Second Sight's Briefing Report Part One. I cannot recall specifically, though it is likely to have been Chris Aujard,

232. The Inquiry has asked me to describe how and to whom was POL's response to Second Sight's Briefing Report Part One disseminated. I cannot comment upon the degree of dissemination within or outside POL.

Briefing Report – Part Two (Thematic Issues) – dated 21 August 2014

233. In responding to this topic, and in order to address the Inquiry's questions, the Inquiry has asked me to consider the following exhibits:

233.1. **POL00006552;**

233.2. **POL00006553;**

233.3. **POL00100479;**

233.4. **POL00021844;**

233.5. **POL00021803;**

233.6. **POL00021934;**

233.7. **POL00021909;**

233.8. **POL00022149;**

233.9. **POL00006557;**

233.10. **POL00132931;**

233.11. **POL00022208;**

233.12. **POL00021916;**

233.13. **POL00040210;**

- 233.14. **POL00021904;**
- 233.15. **POL00022212;**
- 233.16. **POL00021866;**
- 233.17. **POL00040491;**
- 233.18. **POL00021800;**
- 233.19. **POL00040221;**
- 233.20. **POL00021954;**
- 233.21. **POL00021953**
- 233.22. **POL00021922;**
- 233.23. **POL00040233;**
- 233.24. **POL00021760;**
- 233.25. **POL00123336;**
- 233.26. **POL00021883;**
- 233.27. **POL00021773;**
- 233.28. **POL00021886;**
- 233.29. **POL00132933;**
- 233.30. **POL00027113;**
- 233.31. **POL00040252;**
- 233.32. **POL00040253;**
- 233.33. **POL00021763;**
- 233.34. **POL00022240;**
- 233.35. **POL00148981;** and
- 233.36. **POL00148982.**

234. I confirm that I have reviewed those exhibits and they have informed my answers to the below questions. I shall make specific references to exhibits where necessary, to explain my answers.
235. The Inquiry has asked me to summarise my understanding of the findings in Second Sight's Briefing Report Part Two. My understanding of the rationale behind the production of Second Sight's Briefing Report Part Two is explained in exhibit **POL00040253**, namely that Second Sight suggested that they would provide an overarching thematic report which would allow them to write shorter individual case reports. This would be done by drawing upon spot reviews. It was hoped that this would reduce costs and make the case reports more manageable. My understanding of Second Sight's findings was that they had identified key thematic issues relating to the POL systems. This included, but was not limited to, transactional anomalies associated with ATMs, lottery terminals, motor vehicle licenses and foreign currency.
236. The Inquiry has asked me to describe POL's response to Second Sight's Briefing Report Part Two, and what my contribution to that response was. POL's response is summarised in exhibit **POL00006552** by Andrew Parsons who explains that the report lacks detail and evidence to back up sweeping conclusions. I refer to my answer at para. 23. I did not have the technical expertise to provide any substantive technical feedback, my role was to draw together others' comments on those findings and to depersonalise POL's response to the report and ensure the response was measured and factual. I also helped to prepare the logic note (**POL00040253**). This note followed the decision of the Chair of the working group that the release of Second Sight's

Briefing Report Part Two should not be delayed while the disagreement between POL and Second Sight was resolved. This is because Second Sight were providing an independent view. However, it was felt by POL that they needed in parallel to provide clarity that they did not accept the report or its content. I believe the note was sent to all recipients of Second Sight's Briefing Report Part Two I also helped draft the email (**POL00132933**) to applicants of the Scheme expressing POL's position and highlighting some of their various concerns with the report.

237. The Inquiry has asked me to state who else at POL contributed to their response to Second Sight's Briefing Report Part Two. As can be seen from the exhibits, input into the response came from a number of sources, including Paula Vennells, Angela van den Bogerd, Belinda Crowe, Rodric Williams, Chris Aujard, Bond Dickinson, Mark Davies, and myself. Brunswick Group, a PR and crisis management company were also engaged. Paula would have had ultimate oversight of the response – it would have been led by Chris Aujard.
238. The Inquiry has asked me to state what legal advice was obtained in respect of POL's response to Second Sight's Briefing Report Part Two. The report was reviewed by the in-house legal team, Chris Aujard and Rodric Williams, and it was reviewed by Bond Dickinson. Beyond that I am not able to say.
239. The Inquiry has asked me to state who I believe had final say as to the nature and form of POL's response to Second Sight's Briefing Report Part Two. I refer to my answer at para. 237. Paula Vennells, assisted by Chris Aujard and Mark Davies, would have led the response.

240. The Inquiry has asked me to describe how and to whom was POL's response to Second Sight's Briefing Report Part Two disseminated. Exhibit **POL00027113** shows that POL's response was shared with the Working Group, which included Sir Alan Bates and Sir Anthony Hooper. The same email explains that Angela Van Den Bogard also wrote to the applicants of the Scheme who had received the Second Sight Part Two Report.
241. The Inquiry has asked me to consider the exhibit **POL00021916**. I confirm that I have reviewed this exhibit, and it has informed my answers to the below questions. I shall make specific references to the exhibit where necessary, to explain my answers. However, it is important to highlight that this document was a speaking note that I prepared for Belinda Crowe.
242. The Inquiry has asked me to explain why I was "*so concern[ed]*" about Second Sight's Briefing Report Part Two. I refer to my answer at para. 241. It was Belinda's concern that I was noting the point is intended as a speaking point for her to raise with Second Sight.
243. The Inquiry has asked me to explain why I felt that Second Sight's Briefing Report Part Two adversely impacted applicants at mediation. I refer to my answer at para. 241. It was felt that due to the quality of the report and the lack of evidence to support the conclusions, Second Sight's Briefing Report Part Two was not helpful as it did not narrow the gap between mediating parties, as needed.

244. The Inquiry had asked me to explain in what way I believe the scope of Second Sight's work had slipped. I refer to my answer at para. 241. It was felt that not only had timescales slipped but Second Sight had widened their scope to include expressing opinions on matters outside their professional discipline. An example being providing a commentary on the fairness of agent contracts and contract law.
245. The Inquiry has asked me to explain why I believed POL would be "*forced*" to take a particular response to the report in its "*current form*". I refer to my answer at para. 241. It was felt that the report could drive a wedge between the parties, it would further complicate the Scheme and it would not narrow the issues, and therefore POL would need to respond.
246. The Inquiry has asked me to explain, on reflection in the present day, my thoughts about the views that I held at the time. Having reflected extensively on this matter, I still believe that Second Sight's Briefing Report Part Two was not ready for publication at that stage, as it did not document and evidence their findings adequately or in sufficient detail.
247. The Inquiry has asked me to consider the exhibits **POL00040074** and **POL00040076**. I confirm that I have reviewed these exhibits, and they have informed my answers to the below questions. I shall make specific references to the exhibits where necessary, to explain my answers.
248. The Inquiry has asked me to describe what POL's views were as to the existence and nature of any common themes arising from the application to the Scheme. POL acknowledged and were aware that there were key themes

in the applications to the Scheme but at that point in time, those applications had not been investigated.

249. The Inquiry has asked me to describe how, if at all, did my view vary over the period I was involved with the Scheme. Throughout the entire period I was engaged in the Scheme, POL's view remained constant, that there were no systemic issues with Horizon and that had been tested by a High Court judge with the help of an expert witness. It was consistently acknowledged that there were similar themes and / or areas raised by applicants but it was not acknowledged that the themes being raised showed systemic issues with Horizon.

POL's view of Second Sight

250. In responding to this topic, and in order to address the Inquiry's questions, the Inquiry has asked me to consider the following exhibits:

- 250.1. **POL00099977;**
- 250.2. **POL00100134;**
- 250.3. **POL00116250;**
- 250.4. **POL00100198;**
- 250.5. **POL00100200;**
- 250.6. **POL00116255;**
- 250.7. **POL00116276;**
- 250.8. **POL00116270;**
- 250.9. **POL00116279;**
- 250.10. **POL00100322;**

250.11. **POL00100323**;

250.12. **POL00074462**;

250.13. **POL00108377**;

250.14. **POL00116523**;

250.15. **POL00116524**;

250.16. **POL00116578**;

250.17. **POL00108742**;

250.18. **POL00022227**;

250.19. **POL00022231**; and

250.20. **POL00040290**.

251. I confirm that I have reviewed those exhibits and they have informed my answers to the below questions. I shall make specific references to exhibits where necessary, to explain my answers.

252. The Inquiry has asked me to set out my understanding of the opinion in which Second Sight was held by the POL executive and by members of the Scheme management team at the start of my work with the Scheme. At the beginning of my assignment there were capacity concerns raised by numerous people and that view solidified because Second Sight failed to hit some of their timelines.

253. The Inquiry has asked me to explain how, if at all, did those opinions change over the period that I worked on the Scheme. In addition to the capacity concerns, which were highlighted in the Working Group meeting of 27 March 2014, exhibit **POL00026644**, by April 2014 an internal discussion was taking

place in relation to the quality of the work that Second Sight was providing. It was felt their report lacked detail and would make sweeping conclusions without the evidence to back them up.

254. The Inquiry has asked me to explain my understanding of the reasoning for these opinions. The minutes of the Working Group meeting of 27 March (**POL00026644** page 4) notes that Second Sight had missed a deadline for submitting their thematic report and there were other delays caused by Second Sight. The concerns about the standard of their work became more apparent the more reports that were received.
255. The Inquiry has asked me to explain my own opinion of Second Sight. I would like to point out that I wasn't managing their activity, so I am not able to state if they were being frustrated by what they were being provided by POL. I don't know if information was being withheld from them. The problem I witnessed was that the work wasn't of the quality required, was not produced in a timely fashion and the work was not helping to progress mediation.
256. The Inquiry has asked me to explain, on reflection in the present day, to what extent, if at all, do I believe that the opinions within POL were justified. I refer to my answer at para. 255. I witnessed that the work wasn't of the quality required. It often lacked detail and it would make conclusions without providing supporting evidence. I also refer to para. 286.

Criminal Case Review and Prosecution Policy

257. In responding to this topic, and in order to address the Inquiry's questions, the Inquiry has asked me to consider the following exhibits:

- 257.1. **POL00030694;**
- 257.2. **POL00038633;**
- 257.3. **POL00138077;**
- 257.4. **POL00100136;**
- 257.5. **POL00040062;**
- 257.6. **POL00113111;**
- 257.7. **POL00027760;**
- 257.8. **POL00123176;**
- 257.9. **POL00021424;**
- 257.10. **POL00030716;**
- 257.11. **POL00116258;**
- 257.12. **POL00027754;**
- 257.13. **POL00027755;**
- 257.14. **POL00038644;**
- 257.15. **POL00027451;**
- 257.16. **POL00021750;**
- 257.17. **POL00127601;**
- 257.18. **POL00112974;** and
- 257.19. **POL00123322.**

258. I confirm that I have reviewed those exhibits and they have informed my answers to the below questions. I shall make specific references to exhibits where necessary, to explain my answers.

259. The Inquiry has asked me to set out my understanding of POL's role in prosecuting sub-postmasters for theft and false accounting. I refer to my answer at para. 15. During my assignment with POL, my understanding was that POL acted as a private prosecutor and prosecuted cases themselves. I was necessarily aware of those proceedings and the extent to which they affected the way in which they could be progressed and settled through the Scheme. However, I was not part of any decisions relating to the conduct of those proceedings, POL's disclosure obligations within (or after) those proceedings, or the safety of the convictions. My assignment was in relation to the Scheme, which was a separate and distinct workstream from any civil and / or criminal proceedings that were undertaken by POL against SPMs. As explained at para. 134, part of my assignment was to support POL employees with the preparation of some external communications. As can be seen in exhibit **POL00113111** (page 74), I assisted in the drafting of responses to individuals who were under investigation for theft and / or false accounting. The description of me as a Legal Consultant in the minutes of the Audit, Risk and Compliance Sub-Committee (**POL00021424**) is incorrect.
260. The Inquiry has asked me to explain to what extent was the POL Board and / or senior management concerned that convictions had been secured on the basis of potentially unreliable data generated by Horizon. Throughout my assignment, POL were confident that data generated by Horizon was reliable. I was aware that there was a dispute between POL and SPMs, whereby POL held a position that there were no systemic issues with the Horizon system.

261. The Inquiry has asked me to describe to what extent the Scheme management team discussed POL's involvement in prosecuting sub-postmasters and to provide details of any discussions that took place. I refer to my answer at para. 259. The Scheme's management were aware that POL brought private prosecutions, both for theft and false accounting. The Scheme management was aware of those proceedings and the extent to which they affected the way in which they could be progressed and settled through the Scheme.
262. The Inquiry has asked me to consider exhibit **POL00113111**. I confirm that I have reviewed this exhibit and it has informed my answers to the below questions. I shall make specific references to the exhibit where necessary, to explain my answers.
263. The Inquiry have asked to confirm whether Dave Posnett's email of 26 March 2024 on p.112 was addressed to me, and if so, to please explain "*your input into NFA letter re other cases*" and any advice you provided as a result of Mr Posnett's request. I do not recall assisting with the drafting of '*No Further Action*' letters to individuals. When correspondence cut across the scheme, I may have been asked to assist in the tone of the letter, but I had no responsibility for '*No Further Action*' decisions. (**POL00113111** page 12).
264. The Inquiry has asked me to set out full details of my understanding of POL's strategy and actions in respect of past convictions of sub-postmasters that involved the use of data from the Horizon IT System in evidence. I refer to my previous answers; POL's criminal prosecution workstream was separate to the Scheme and therefore I was not aware of POL having a strategy. I note

from exhibit **POL00021424** that I was present at the February 2014 Audit, Risk and Compliance ('ARC') Committee. The membership of the committee was normally very tight and limited. I believe I was invited to the meeting to assist with communicating the prosecution policy to the board. As can be seen from **POL00027754**, I was asked to send the board paper relating to the review of the current prosecution policy to EXCO. I had no input into the recommended changes of the policy.

265. The Inquiry has asked me to explain what involvement the Scheme's management team had with the review of past criminal prosecutions undertaken by Cartwright King, and what my understanding was at the time as to the reason why that review was undertaken. I refer to my answers in the section commencing at para. 68. I did not have any involvement into the review of past criminal prosecutions undertaken by Cartwright King. I am unable to speak to Scheme management as a whole.
266. The Inquiry has asked me to explain what contribution the Scheme's management team made to disclosure decisions in relation to past and ongoing prosecutions. I did not contribute to any disclosure decisions, but I am unable to speak to Scheme management team.
267. The Inquiry has asked me to describe what impact Second Sight and the Scheme had on POL's approach to bringing prosecutions. The approach taken by POL relating to prosecutions had been initiated before I started my assignment. I was not made aware that any review or changes to the prosecution policy was related to the Second Sight and / or the Scheme.

268. The Inquiry has asked me to explain the process by which changes to the prosecution policy were implemented. I refer to my answer at para. 264. I was invited to the February ARC meeting, which was a single-issue meeting relating to the proposed changes to the prosecution policy, to assist with communicating the proposed changes to the board. I am not aware why changes to the prosecution policy were implemented.

269. The Inquiry has asked me to explain what role I had in assisting any such changes to the prosecution policy and to develop the new policy. I refer to my answer at para. 268. I assisted with communicating the proposed changes to the POL Board and would have then been in a position to draft any additional correspondence that may have been required in relation to those changes, though I do not recall having to do so.

Public Statements and Media Strategy

270. In responding to this topic, and in order to address the Inquiry's questions, the Inquiry has asked me to consider the following exhibits:

270.1. **POL00123148;**

270.2. **POL00040056;**

270.3. **POL00138101;**

270.4. **POL00040075;**

270.5. **POL00116579;**

270.6. **POL00116580;**

270.7. **POL00044356;**

270.8. **POL00101295;**

270.9. **POL00101297;**

270.10. **POL00101305;**

270.11. **POL00101316;**

270.12. **POL00101350;**

270.13. **POL00101361;**

270.14. **POL00101362;** and

270.15. **POL00040282.**

271. I confirm that I have reviewed those exhibits and they have informed my answers to the below questions. I shall make specific references to exhibits where necessary, to explain my answers.

272. The Inquiry has asked me to explain what role the management team of the Scheme had in providing oversight of POL communications / PR. I refer to my answer at para. 6. My past experience in the Civil Service not only involved project delivery, but also handling external communications, so providing input into POL communications / PR was within my professional competence. In addition, Belinda had joined POL from the Ministry of Justice, originally, so would have been comfortable in handling external communications. We would work with Mark Davies through his team, and through Sophie, who was embedded into the Scheme team, to agree POL public facing position issues. Scheme management were consulted and had a role in drafting and agreeing media lines where it could impact public perception on the Scheme. I was also asked to assist on wider associated issues as and when required.

273. The Inquiry have asked to explain my understanding of POL's public communications strategy in relation to journalists and the wider public in respect of Horizon, Second Sight and the Scheme. In respect of Horizon, the strategy was to reassure and reiterate that Horizon was a functioning system and had no systemic flaws. This was done by reference to independent validation, namely that Second Sight's interim report provided that Horizon was a reliable system and with no systemic flaws. This allowed POL to reassure all stakeholders that the prosecutions were safe. In respect of a communications strategy relating to Second Sight, there was minimal public comment on Second Sight by POL. When Second Sight's Briefing Report Part Two was obtained by different journalists, POL confirmed their position was that the report was inaccurate (**POL00101305**). The communications strategy in relation to the Scheme is outlined in **POL00116580**. The purpose of the communications strategy was to show there was a desire by POL to resolve SPM's concerns, and that the Scheme had been established with an Independent Chair to investigate any complaints and to resolve them through mediation if possible.
274. The Inquiry has asked me to consider how, if at all, did this strategy change over the period that I worked for POL, and the reasons for any changes. During my assignment, there was no change in strategy in respect of Horizon, Second Sight or the Scheme. I refer to my answer at para. 273. Following journalists obtaining Second Sight's Briefing Report Part Two, there was an overt statement disagreeing with the report and expressing concerns about its

accuracy, but I was not aware of an active campaign to communicate this sentiment more broadly, it was only in response to specific requests.

275. The Inquiry has asked me to consider in turn each news publication, broadcast, and or transmission relating to Horizon, Second Sight and the Scheme that occurred during my time working on the Scheme and to set out:

- i) how the publication was received in POL; ii) the detail of POL's response;
- iii) how POL's response was prepared; and iv) how POL's response was delivered.

276. It is difficult to recall the exact way in which each publication was received by POL and / or the detail of the response. However, there was overarching guidance and some contingency planning for potentials areas of media interest, both of which were led by the media and communications team. The wording of such statements or briefings were finalised by Mark Davies and the press office. The POL press office would field queries and request input from members of POL or Scheme management, if and when required. There was often a collaborative development of a position and an agreed approach relating to who and how to engage with journalists. When POL were made aware that different media outlets had obtained a copy of Second Sight's Briefing Report Part Two (**POL00101350**), the proposed media coverage was received with concern as it was felt it was inaccurate. The subsequent media coverage, where the journalists had altered their line following input from Post Office, was met more calmly. The Scheme management were not in any way authorised to speak to the media unless prior approval was given by the POL press office.

Engagement with Politicians

277. In responding to this topic, and in order to address the Inquiry's questions, the Inquiry has asked me to consider the following exhibits:

- 277.1. **POL00108232;**
- 277.2. **POL00100124;**
- 277.3. **POL00100126;**
- 277.4. **POL00100128;**
- 277.5. **POL00100144;**
- 277.6. **POL00116246;**
- 277.7. **POL00116247;**
- 277.8. **POL00100142;**
- 277.9. **POL00100141;**
- 277.10. **POL00100136;**
- 277.11. **POL00100203;**
- 277.12. **POL00108257;**
- 277.13. **POL00100191;**
- 277.14. **POL00108351;**
- 277.15. **POL00026743;**
- 277.16. **POL00100210;**
- 277.17. **POL00100226;**
- 277.18. **POL00116258;**
- 277.19. **POL00100254;**
- 277.20. **POL00077180;**

- 277.21. **POL00116325;**
- 277.22. **POL00108341;**
- 277.23. **POL00116340;**
- 277.24. **POL00130527;**
- 277.25. **POL00116344;**
- 277.26. **POL00108346;**
- 277.27. **POL00100445;**
- 277.28. **POL00116353;**
- 277.29. **POL00116356;**
- 277.30. **POL00116351;**
- 277.31. **POL00116367;**
- 277.32. **POL00116381;**
- 277.33. **POL00116334;**
- 277.34. **POL00116382;**
- 277.35. **POL00027700;**
- 277.36. **POL00116407;**
- 277.37. **POL00116413;**
- 277.38. **POL00100506;**
- 277.39. **POL00116436;**
- 277.40. **POL00116500;**
- 277.41. **POL00116507;**
- 277.42. **POL00025801;**
- 277.43. **POL00116530;**
- 277.44. **POL00116531;**
- 277.45. **POL00116536;**

- 277.46. **POL00116544;**
- 277.47. **POL00116548;**
- 277.48. **POL00116549;**
- 277.49. **POL00116550;**
- 277.50. **POL00116551;**
- 277.51. **POL00116552;**
- 277.52. **POL00116553;**
- 277.53. **POL00116562;**
- 277.54. **POL00116563;**
- 277.55. **POL00100737;**
- 277.56. **POL00100695;**
- 277.57. **POL00116579;**
- 277.58. **POL00116580;**
- 277.59. **POL00131522;**
- 277.60. **POL00025801;**
- 277.61. **POL00131534;**
- 277.62. **POL00116584;**
- 277.63. **POL00100891;**
- 277.64. **POL00116593;**
- 277.65. **POL00116648;**
- 277.66. **POL00116649;**
- 277.67. **POL00116661;**
- 277.68. **POL00116668;**
- 277.69. **POL00116679;**
- 277.70. **POL00101054;**

277.71. **POL00101053**;

277.72. **POL00116944**;

277.73. **POL00109115**;

277.74. **POL00109203**;

277.75. **POL00109204**; and

277.76. **POL00105556**.

278. I confirm that I have reviewed those exhibits and they have informed my answers to the below questions. I shall make specific references to exhibits where necessary, to explain my answers.

279. The Inquiry has asked me to explain what I understood to be POL's communications strategy in relation to parliamentarians such as Lord Arbuthnot and Oliver Letwin MP and to government ministers, in respect of Horizon, Second Sight and the Scheme, and to further explain: i) how, if at all this strategy changed over the period that I worked for POL; ii) the reasoning for any changes; iii) the extent to which POL were seeking to persuade MPs that their constituents' concerns were wrong; and iv) the extent to which POL were seeking to listen and investigate those concerns.

280. Similar to my answer at para. 273, the communication strategy in respect of Horizon was to reassure and reiterate that Horizon was a functioning system and had no systemic flaws. This allowed POL to reassure parliamentarians that the prosecutions were safe. This strategy never altered during my assignment. In respect of a communications strategy relating to Second Sight and the Scheme, as Second Sight and the Scheme were a mechanism for

investigating the MPs complaints, POL tried to reassure parliamentarians that the Scheme was the correct route for their complaints to be resolved, and Second Sight had the ability to independently to look into the complaints as part of the Scheme, and report directly to parliamentarians if required. Again, this strategy never altered during my assignment. I am not aware that POL ever explained to parliamentarians that their constituents were wrong. The communication strategy with politicians was always that the Scheme would investigate their constituent's claims and if POL found evidence of a miscarriage of justice, they would deal with it accordingly. It is worth repeating that the purpose of the Scheme was to create a framework under which SPM complaints would be investigated and, where possible, result in a mediation meeting to try and reach a resolution for that complaint. Engagement with parliamentarians allowed POL to listen to, and investigate, constituents' concerns.

281. The Inquiry has asked me to take in turn each meeting that occurred between POL and Lord Arbuthnot and / or any other members of parliament during my time working for POL and set out to the best of my knowledge: i) who attended the meetings; ii) how the attendees at the meetings were briefed for the meetings, including everyone responsible for contributing to the briefings; iii) the source of any evidence used to prepare the briefings; iv) to what extent, if at all, POL's IT and problem management teams were consulted in preparing briefings; v) how I personally prepared for any contributions I made towards the briefings; vi) how decisions were made as to the scope and limits of the information provided to the parliamentarians at each meeting, including who

was responsible for those decision; vii) POL's objectives for the meetings; viii) a full account of what was said in the meetings; and ix) any and all action that was taken as a result of the meetings.

282. It is difficult to recall the exact details of each meeting between POL and Lord Arbuthnot and / or any other members of parliament during my assignment. POL engaged with parliamentarians on a wide range of issues. My role in relation to meetings with parliamentarians is helpfully highlighted within the exhibits, namely, to pull together a briefing note for members of POL who were attending those meetings. I would walk the attendees through the briefing notes, which would usually include either Alice and / or Paula. I would often then be tasked to work on certain things within the briefing note with other senior leaders within POL (**POL00116247**). Where necessary, I would add any follow up points to the briefing document. I also helped to draft an agreed agenda with the parliamentarian's secretary (**POL00100128**). As far as I can recollect, I only attended one meeting with Lord Arbuthnot, on 28 January 2013, as the Scheme was being discussed (**POL00026743**). From the exhibits, I can see that the senior leadership team of POL attended those specific meetings; this included Alice Perkins, Paula Vennells, Angela Van Den Bogerd, Mark Davies and Chris Aujard. Usually, an agreed agenda and a written briefing was provided to POL individuals, and there was a pre meeting which often resulted in an updated briefing document being provided. Alice and / or Paula led the pre-meeting briefings with them. I was never instructed to withhold anything from the briefing. The set of correspondence for the January 2014 meeting (**POL00100124**) is a good example of the preparation that took place for the meetings. The process for briefing

parliamentarians was no different to briefing the POL board. I took care to make sure the data was, as far as I was aware, fair, true and accurate. The only primary evidence that I would have provided would have been the status of the cases currently in the Scheme. Everything else was provided by other teams. POL's IT team would have provided input into these briefings. Fujitsu may have provided input, but that would not have been through the Scheme or me. The objective of the meetings with Lord Arbuthnot and other parliamentarians, was to reassure parliamentarians that the Scheme was the correct route for their complaints to be resolved, to update them on the progress of the Scheme and to reassure them that POL was taking the Scheme seriously, committing necessary resource and progressing cases expeditiously. **POL00026743** shows that a final note was agreed between POL and the office of Lord Arbuthnot following the meeting that I attended. A list of actions was noted and agreed upon. I believe that the actions flowed from the meeting.

283. The Inquiry has asked me to explain my understanding as to how Lord Arbuthnot's stance in relation to the Mediation Scheme changed during 2014, and to further explain: i) what my understanding was for the reason for any change; ii) how POL responded to Lord Arbuthnot's changing stance; and iii) how and by whom decisions on that response were made.
284. I refer to my answer at para. 4; my assignment ended in October 2014. **POL00026743** minutes that as of January 2014, Lord Arbuthnot was pleased with progress being made under the scheme. I'm unaware of any material

change in that position being communicated to the Scheme team or to me directly.

GENERAL

285. The Inquiry has asked me to reflect on my time with POL and set out whether there is anything I would have handled differently with hindsight, in relation to the Horizon IT System and its associated issues. As I've made clear throughout my statement, my role as Programme Manager for the Scheme did not involve any direct involvement with, or analysis of, the Horizon IT System itself. My answer to this question is therefore limited to the Scheme and the associated issues which arose during its operation, until the end of my assignment with POL in October 2014. Given my involvement with the Scheme, I have inevitably followed the evidence which has emerged during the course of the Inquiry and the associated media coverage. My answer to this question is therefore in two parts: (i) reflection upon my involvement with the Scheme, based upon my recollection of the knowledge and information I had at that time; and (ii) reflection upon my involvement with the Scheme, including my knowledge of the events which post-dated my assignment with POL and the evidence which the Inquiry has heard.

286. Based upon my recollection of the knowledge and information I had at the time, I cannot identify any points at which I would have handled things in a materially different way. I was engaged by POL to assist with the administration of an already established Scheme and in the wider context of a significant period of public scrutiny of POL. I believe that at all times I performed my role properly and with professional integrity. I believe that the

Scheme was set up with the right intentions, in order to investigate and hopefully resolve as many of the SPM complaints as possible; that was certainly the basis upon which I worked on the Scheme and tried to progress cases through it. Ultimately, I was not a POL representative and did not have the power or authority to dictate POL's position as a party to the Scheme and mediations. I have reflected upon the period in August 2014 when Second Sight issued their Part 2 report. I have set out in this statement my view that the Part 2 report did not deliver what was needed for the Scheme's cases at that time, in terms of providing a clear evidential basis for the issues being raised. I reiterate my comments earlier in this statement that this criticism is not in relation to the factual basis of the issues themselves, but that the report did not further or clarify the positions of either POL or any respective SPM; the distance between the parties was not narrowed. The Part 2 report should have resulted in POL obtaining the evidence base that would have facilitated meaningful mediations. The Part 2 report released to applicants in August 2014 did not do that. At that point, in hindsight, I believe POL should have commissioned alternative independent work in order to fill that evidential gap. Proceeding to mediate cases from that point, in the absence of further evidence which may have resulted in concessions by either mediating party, feels like a missed opportunity. I sympathise with the SPMs who feel like their cases were never going to be resolved through the Scheme. Notwithstanding that reflection, I do not believe that I could have materially changed the course POL was taking.

Index to the First Witness Statement of David Oliver

<u>No.</u>	<u>URN</u>	<u>Document Description</u>	<u>Control number</u>
1.	POL00040076	Key Themes Emerging out of the applications to the scheme	POL-0036558
2.	POL00021872	Email from Andy Holt to Andrew Parsons re: New Requests (Bates - freedom of information requests)	POL-0018351
3.	RLIT0000007	Appendix 2 - Summary of Bugs, Errors, Defects - Judgment (No.6) "Horizon Issues" to Bates & Ors v the Post Office Ltd (No 6: Horizon Issues) (Rev 1) [2019] EWHC 3408 (QB) (16 December 2019) (Horizon Issues Judgment)	RLIT0000007
4.	POL00105529	Legally privileged initial complaint and mediation scheme review by Chris Aujard	POL-0105096
5.	POL00108424	Email from Andrew Parsons to Belinda Crowe, Angela Van-Den-Bogerd and others re: Post Office Mediation Claims. [BD-4A.FID20472253]	POL-0106524
6.	POL00029710	Email from Andrew Winn to Alan Lusher re: Rivenhall	POL-0026192
7.	POL00138077	Post Office; Initial Complaint Review and Mediation Scheme Programme Board Slides	POL-BSFF-0000313
8.	POL00138101	Initial Complaints Review and Case Mediation Scheme Programme Board.	POL-BSFF-0000337
9.	POL00108521	Email from Lesley J Sewell to Andy Holt, Belinda Crowe, Chris Aujard and others re: Requests to retain Fujitsu data (CRO3170/ROM3170)	POL-0106618
10.	POL00021883	Email from Belinda Crowe to Dave Hulbert re: Second Sight Part Two	POL-0018362
11.	POL00021870	Email from Andrew Parsons to Belinda Crowe, Rodric Williams and Andrew Pheasant and others re: Response to Second Sight Part 2 report Final Draft (incorporating ADVB DO and AP comments)	POL-0018349

<u>No.</u>	<u>URN</u>	<u>Document Description</u>	<u>Control number</u>
12.	POL00116487	Email from Andrew Parsons to Belinda Crowe, David Oliver, Rodric Williams and others re Post Office Mediation Claims	POL-0115055
13.	POL00029707	Email from Andrew Parsons to Belinda Crowe, Angela Van-Den-Bogerd, Andy Holt and Rodric Williams and others, re: Post Office Mediation Claims.	POL-0026189
14.	POL00116480	Appendix 1 - Credence data and Fujitsu transaction logs for Lepton SPSO 191320	POL-0115048
15.	POL00116486	Horizon Spot review, response, SR01 Debit cards - cash withdrawals and GIRO payments.	POL-0115054
16.	POL00108439	Email from Andrew Parsons to Rodric Williams, Belinda Crowe and others, RE: Post Office Mediation Claims "Lepton Report"	POL-0106538
17.	FUJ00086811	Horizon data, Lepton SPSO 191320, Draft Report by Helen Rose	POINQ0092982F
18.	POL00020634	Email chain from Andrew Parsons to Chris Aujard, Rodric Williams, Jarnail Singh and others re: Helen Rose Report and CQRs re Gareth Jenkins report	POL-0013826
19.	POL00099063	Signed Interim Report into alleged problems with the Horizon system	POL-0098646
20.	POL00113111	Email chain from Sharron L Jennings to Martin Smith re: Prosecution of Philip Dauncey. @This also contains attachments of Case Note Entries	POL-0110499
21.	POL00006798	Legal advice on the use of expert evidence	POL-0017590
22.	POL00123148	Email chain from Sophie Bialaszewski to Jarnail Singh cc David Oliver, Rodric Williams and others RE: Post Office Ltd /Abbas & Daw - 41459 - Selsey Road - POLTD/1314/0014 [BD-4A.FID20472253]	POL-0129353
23.	POL00123147	Email from Jarnail Singh to David Oliver cc Rodric Williams RE: briefing on Cartwright King review work	POL-0129352

<u>No.</u>	<u>URN</u>	<u>Document Description</u>	<u>Control number</u>
24.	POL00108247	Advice on Evidence Report for Philip Dauncey. Advice by Harry Bowyer (Cartwright King)	POL-0106372
25.	POL00127601	Email chain from Jarnail Singh to Kathryn Alexander, cc'd Shirley Hailstones, Belinda Crowe and others re Mediation Applicants' Criminal Files.	POL-0134366
26.	POL00112974	Project Magellan- Generic Disclosure Review - Schedule of Extracts Of Disclosable Material	POL-0110369
27.	POL00116944	Email from Jarnail Singh to David Oliver, Rodric Williams, Belinda Crowe and others re: RE: Rt Hon James Arbuthnot MP letter	POL-0117793
28.	POL00021750	Email from Andrew Parsons to Rodric Williams, re: FW, Disclosure query	POL-0018229
29.	POL00040254	Email chain between Gavin Matthews, Rodric Williams, Andrew Parsons and others RE: , Advice from Brian Altman QC on Suggested Approach to Criminal Case Mediation	POL-0036736
30.	POL00074348	Email from David Oliver to Christa Band RE Documents email four - Case M001	POL-0070911
31.	POL00021989	Email from David Oliver to Christa Band re: Mediation Scheme-confidential and privileged	POL-0018468
32.	POL00027696	Email from David Oliver to Paula Vennells RE: Scope for Linklaters work	POL-0024337
33.	POL00021991	Email from David Oliver to Johnathan Swil re: Advice for Linklaters	POL-0018470
34.	POL00022083	Email from David Oliver to Jonathon Swil, Chris Aujard and Belinda Crowe and others, RE Draft report	POL-0018562
35.	POL00022116	Email from Belinda Crowe to Rodric Williams regarding plans going forwards	POL-0018595
36.	POL00022093	Outline of points produced by Linklaters to explain Horizon and form a basis for a report to respond to public criticism and individual complaints by SPs.	POL-0018572

<u>No.</u>	<u>URN</u>	<u>Document Description</u>	<u>Control number</u>
37.	POL00022117	Preliminary Note on the Future of the Mediation Scheme - Post Office Limited	POL-0018596
38.	POL00116523	Email from Mark Davies to Belinda Crowe, Chris Aujard, Sophie Bialaszewski, and others, Re: 2014 01 22 Initial Complaint Review and Mediation Scheme Briefing	POL-0114594
39.	POL00116524	The Post Office and the Horizon System -	POL-0114595
40.	POL00116548	Email chain David Oliver to Mark R Davies, Sophie Bialaszewski cc Jane Hill RE: Correspondence for review (for Paula)	POL-0117476
41.	POL00127347	Email chain from Sophie Bialaszewski to Melaine Corfield, Rodric Williams, Matthew Fielden cc Belinda Crowe, David Oliver RE: Linklaters advice re potential format for the Horizon Computer system report	POL-0132889
42.	POL00006557	Email re Project Sparrow	POL-0017651
43.	POL00022208	Email from Jonathan Swil to Belinda Crowe, Melanie Corfield, Rodric Williams and others regarding Version 4 of part 2 response	POL-0018687
44.	POL00021800	Email from Belinda Crowe to David Oliver, Melanie Corfield and Andrew Parsons RE: Fwd: Second Sight's Draft Part Two Report	POL-0018279
45.	POL00022227	Email chain from Melanie Corfield to Jonathan Swil, Belinda Crowe, David Oliver and other regarding examples for letter to SS	POL-0018706
46.	POL00022231	Email chain between Jonathan Swill, Belinda Crowe, Chris Aujard and others, regarding a letter to Second Sight re quality of work.	POL-0018710
47.	POL00105528	Project Sparrow Subcommittee ToR and discussion documents: Options for the future of the Scheme; Update on Horizon Assurance Work; public statements made re ICMRS and overview of ICRMS.	POL-0105095
48.	POL00006565	Project Sparrow Sub-Committee Minutes	POL-0017844

<u>No.</u>	<u>URN</u>	<u>Document Description</u>	<u>Control number</u>
49.	POL00116502	Email chain between Sophie Bialaszewski, David Oliver, Belinda Crowe and others - Re: Project Sparrow Sub-Committee - POL Initial Complaints Review and Mediation Ministerial Commitments	POL-0114592
50.	POL00028062	Report: Horizon Desktop Review of Assurance Sources and Key Control Features - draft for discussion, Deloitte	POL-0023065
51.	POL00116578	Email chain from Ruth X Baker to Mark R Davies, Belinda Crowe cc Nina Arnott and others Re: Continue but refine	POL-0114598
52.	WITN09780101	POL APRIL invoice cover letter v2.docx	WITN09780101
53.	POL00030694	Note on resources for Project Sparrow	POL-0027176
54.	POL00027482	Post Office Limited - Board Paper - Project Sparrow Update by Chris Aujard	POL-0024123
55.	POL00099977	Minutes for meeting on 27 November re: Costs, Second Sight	POL-0099560
56.	POL00100003	Post Office Limited, PROJECT SPARROW - UPDATE, 2013	POL-0099586
57.	POL00130507	Memo from Chris Aujard to POL Board, cc'd ExCo re: Project Sparrow Update	POL-0124097
58.	POL00116277	Email from Belinda Crowe to Martin Edwards re Sparrow.	POL-0117270
59.	POL00108430	Email from Paula Vennells to Theresa Iles re: Sparrow Sub-Committee	POL-0110986
60.	POL00116576	Email chain from Mark R Davies to Belinda Crowe, Paula Vennells, Chris Aujard and others re: Sparrow s/c	POL-0117504
61.	POL00116579	Email from Mark R Davies to David Oliver, Sophie Bialaszewski, Belinda Crowe and others, Re: AP Slide Deck Comms Lines	POL-0114599
62.	POL00116580	PowerPoint Presentation: Communication Key Messages	POL-0114600
63.	POL00006571	Project Sparrow Sub-Committee Minutes 6 June 2014	POL-0017847

No.	URN	Document Description	Control number
64.	UKGI00002375	Email chain from Richard Callard to Peter Batten re: FW: Board Papers	UKGI013189-001
65.	POL00096576	Post Office Limited: Proposal to carry out an Independent Review of Past Fraud and Theft Cases	POL-0096159
66.	POL00096615	Draft, Post Office Limited, Terms of Reference: Proposal for an independent review of the company's systems relating to the occurrence of apparent shortfalls in individual PO branch accounts	POL-0096198
67.	POL00117119	Email from Alwen Lyons to Angela-Van-Bogerd, Simon Baker, Mike Granville and others re Horizon TOR	POL-0117951
68.	POL00100123	Email from Sophie Bialaszewski to Paula Vennells cc: Chris Aujard re: Second Sight	POL-0099706
69.	POL00100165	Email from David Oliver to Paula Vennells re For 1130 Meeting - Mediation Scheme	POL-0099748
70.	POL00100166	Draft Engagement Letter from Chris Aujard for POL to Second Sight RE: Initial Complaint Review and Mediation Scheme	POL-0099749
71.	POL00100198	Email from David Oliver to Paula Vennells RE: Second Sight and James Arbuthnot	POL-0099781
72.	POL00026743	Final Note by David Oliver of Meeting held on 28/01/2014 between Post Office and James Arbuthnot MP	POL-0023384
73.	POL00116305	Email from Paula Vennells to Belinda Crowe, David Oliver, Chris Aujard and others re. Papers for tomorrow - our pre-meeting, and meetings with Second Sight and Tony Hooper.	POL-0117298
74.	POL00100322	Memorandum from Belinda Crowe to Paula Vennells, and others, re: Briefing for the meetings with Second Sight and Sir Anthony Hooper on Monday 24 February.	POL-0099905
75.	POL00100323	Annotated Agenda, Meeting with Second Sight on 24 February 2014.	POL-0099906

<u>No.</u>	<u>URN</u>	<u>Document Description</u>	<u>Control number</u>
76.	POL00022146	Email from Belinda Crowe to Rodric Williams regarding second sight side engagement letter	POL-0018625
77.	POL00022148	Engagement letter in relation to the initial complain review and mediation scheme	POL-0018627
78.	POL00022147	Engagement letter in relation to the Initial Complaint Review & Mediation Scheme	POL-0018626
79.	POL00061744	Email chain from Belinda Crowe to Andrew Parsons and Rodric Williams re: Email retrieval [BD-4A.FID255887215]	POL-0058223
80.	POL00061304	Email chain from Rodric Williams to Chris Aujard and Andrew Parsons cc Belinda Crowe re: Access to legal files	POL-0057783
81.	POL00021937	Email from David Oliver to Ron Warmington and Ian Henderson re: Note on pensions and allowances reintroduction fraud	POL-0018416
82.	POL00021933	Document responding to points raised by Second Sight investigation. Initial Complaint Review and Mediation Scheme @Pensions and Allowances "Reintroduction" Fraud	POL-0018412
83.	POL00022120	Overview of the initial complaint review and mediation scheme.	POL-0018599
84.	POL00040074	Email from Nicky Mal to Chris Aujard, Fay Healey, Belinda Crowe and others, RE: "The Scheme Programme Board Papers."	POL-0036556
85.	POL00040077	Independent Resolution of future cases policy- project brief	POL-0036559
86.	UKGI00002361	Initial Complaint Review and Mediation Scheme Terms of Reference for the Working Group	UKGI013175-001
87.	POL00101350	Email chain from Nina Arnott to Piero D'Agostin, David Oliver and others re: Radio 4 Transcription	POL-0100933
88.	POL00040075	Post Office Media Scenario Planning- Initial Complaint Review and Mediation Scheme Presentation	POL-0036557

<u>No.</u>	<u>URN</u>	<u>Document Description</u>	<u>Control number</u>
89.	POL00040078	Initial Complaint Review and Mediation Scheme Programme Board	POL-0036560
90.	POL00138147	Initial Complaints Review & Case Mediation Scheme Programme Board	POL-BSFF-0000378
91.	POL00100032	Initial Complaints Review & Case Mediation scheme Steering Group	POL-0099615
92.	POL00138167	Initial Complaints Review & Case Mediation Scheme Programme Board	POL-BSFF-0000396
93.	POL00138176	Initial Complaints Review & Case Mediation Scheme Programme Board	POL-BSFF-0000405
94.	POL00138282	Initial Complaints Review & Case Mediation Scheme Programme Board	POL-BSFF-0000508
95.	POL00146797	Post Office Executive Committee: Horizon - Initial Complaint Review and Mediation Scheme Settlement Policy	POL-BSFF-0005924
96.	POL00027505	Initial Complaint Review and Mediation Scheme - [Draft] Settlement Policy	POL-0024146
97.	POL00129110	Email from Belinda Crowe to Chris Aujard, cc. David Oliver re: Initial Complaints and Mediation Scheme - Settlement Policy.	POL-0132847
98.	POL00040201	Email from Andrew Parsons to Belinda Crowe, Angela Van Den Bogerd, Rodric Williams etc, RE: M127- CRR response and settlement analysis	POL-0036683
99.	POL00125093	Email from Kathryn Alexander to Carole Butler, Chris J Gilding and others re: M029 Report case summary.	POL-0131093
100.	POL00040079	Email from Angela Van Den Bogerd to Claire Parmenter, Belinda Crowe cc Andrew Parsons and others RE: Training Pack for POL mediation attendees	POL-0036561
101.	POL00040084	Email from Nicky Mal to Belinda Crowe, Chris Aujard, Angela Van-Den-Bogerd, RE: Remaining papers for the Scheme Programme Board	POL-0036566

<u>No.</u>	<u>URN</u>	<u>Document Description</u>	<u>Control number</u>
102.	POL00040082	Initial Complaint Review and Mediation Scheme- Briefing to Post Office Attendees	POL-0036564
103.	POL00038682	Draft Paper for the Working Group on Delays in Investigating Cases	POL-0027993
104.	POL00040182	Email from Andrew Parsons to David Oliver, RE: FW: Mediation Pack v2	POL-0036664
105.	POL00040183	PO Initial Mediation Scheme Pack - Draft	POL-0036665
106.	UKGI00002395	Email from David Oliver to Chris Aujard cc Belinda Crowe, Angela Van Den Bogers and others re Mrs Javinder Barang - Lower Stondon Post Office - Late application to scheme	UKGI013209-001
107.	POL00061460	Peter Holmes case study: Email from Rodric Williams to Harris Matthew, Angela Van-Den Bogerd CC various others re M003 - Holmes/Jesmond PO) - POL GC Approved	POL-0057939
108.	POL00116648	Email from David Oliver to Belinda Crowe, Mark R Davies, Sophie Bialaszewski and others re: Letter from M005 to PM.	POL-0117521
109.	POL00116649	Letter to David Cameron PM from Mrs Jennifer O Dell @Re: Mrs O'Dell's Second Sight case	POL-0117522
110.	POL00021803	Email from Roderic Williams to Caroline Culver re: Part 2 SS Report	POL-0018282
111.	POL00074651	Email from Belinda Crowe to Angela Van-Den-Bogerd, Lena Hameed, Andrew Parsons and others re MO33 IA/QA - Discusses early settlement	POL-0071214
112.	POL00108764	Email chain from Angela Van-Den-Bogerd to Andrew Parsons, Belinda Crowe, David Oliver and others, RE: New CQRs	POL-0106842
113.	POL00061594	Email chain from Angela Van-Den-Bogerd to Shirley Hailstones, Jonny Gribben, Matthew Harris and others, RE: Updated Evidence Files (Lynette Hutchings)	POL-0058073

<u>No.</u>	<u>URN</u>	<u>Document Description</u>	<u>Control number</u>
114.	POL00021760	Email from Rodric Williams to Andrew Parsons re: Applicants letter P2 (response to Second Sight Report)	POL-0018239
115.	POL00124439	Email from Stephen Hocking to Rodric Williams re: Escalation points for WG.	POL-0126742
116.	POL00075691	Email from Patrick Bourke to Andrew Parsons, cc'd Jessica Barker RE: Schduling [BD-4A.FID20472253]	POL-0072254
117.	POL00075679	Email from Patrick Bourke to Belinda Crowe and Andrew Parsons cc: David Oliver re. Schduling.	POL-0072242
118.	POL00027685	Email from Chris Aujard to Belinda Crowe, David Oliver, Angela Van-Den-Bogerd and others RE: The ARC meeting on Tuesday	POL-0024326
119.	POL00130509	Initial Complaint Review and Medication Scheme Paper (to be provided shortly on Egress)	POL-0124099
120.	POL00116348	Email from Neil Hayward to Belinda Crowe, cc Paula Vennells, Chris Aujard and others re Post Office Ltd Board - Mediation Scheme Update March 2014 v3 following advice from Linklaters	POL-0117341
121.	POL00116241	Briefing Note from Belinda Crowe to Paula Vennells cc Chris Aujard, Hugh Flemington 'and others' re: Briefing for your 1-2-1 with Alice	POL-0117235
122.	POL00116240	Email from Belinda Crowe to Martin Edwards, David Oliver, Chris Aujard and others RE: Briefing for Paula's 1-2-1 with Alice	POL-0117234
123.	POL00116562	Email chain from Martin Edwards to Belinda Crowe, Mark R Davies and others@RE: Sparrow: Draft Letters and Next steps	POL-0117490
124.	POL00108742	Email chain from Avene O'Farrell to Chris Aujard cc Amanda A Brown re: FW: Printed Re: Sparrow update paper	POL-0111004
125.	UKGI00002360	Email from Belinda Crowe to Alwen Lyons, Alice Perkins, Alasdair Marnoch and Others	UKGI013174-001

<u>No.</u>	<u>URN</u>	<u>Document Description</u>	<u>Control number</u>
		RE Board Sparrow Subcommittee Papers - Working Group Terms of Reference	
126.	POL00026641	Initial Complaint Review and Mediation Scheme - Working Group - Minutes - 30 January 2014	POL-0023282
127.	POL00026666	Working Group for the Initial Complaint Review and Mediation Scheme (Key points and actions from the conference call)	POL-0023307
128.	POL00026638	"Working Group for the Initial Complaint Review and Case Mediation Scheme" Amended Minutes of 03/01/2014	POL-0023279
129.	POL00026639	"Working Group for the Initial Complaint Review and Case Mediation Scheme Standing Agenda" for 16/01/2014.	POL-0023280
130.	POL00026640	Meeting Minutes for Working Group for the Initial Complaint Review and Case Mediation Scheme	POL-0023281
131.	POL00026635	Working Group for the Initial Complaint Review and Case Mediation Scheme Standing Agenda for Thursday Calls	POL-0023276
132.	POL00043626	Working Group for the Initial Complaint Review and Case Mediation Scheme'	POL-0040129
133.	POL00026636	Working Group for the Initial Complaint Review and Case Mediation Scheme Standing Agenda for 20/02/2014	POL-0023277
134.	POL00026637	"Working Group for the Initial Complaint Review and Case Mediation Scheme Standing Agenda" for 27/02/2014	POL-0023278
135.	POL00026656	Face to face meeting of the working group - Initial complaint review and mediation scheme- 7 March 2014	POL-0023297
136.	POL00026643	Working Group for the Initial Complaint Review and Case Mediation Scheme Standing Agenda for 13/03/2014	POL-0023284

<u>No.</u>	<u>URN</u>	<u>Document Description</u>	<u>Control number</u>
137.	POL00026642	Working Group for the Initial Complaint Review and Case Mediation Scheme Standing Agenda	POL-0023283
138.	POL00026644	Working Group for the Initial Complaint Review and Case Mediation Scheme - Minutes for 27/03/2014.	POL-0023285
139.	POL00026633	Initial Complaint and Mediation Scheme Working Group Minutes of 01/04/2014.	POL-0023274
140.	POL00026652	Working Group for the Initial Complaint Review and Case Mediation Scheme minute dated 17/04/2014	POL-0023293
141.	POL00026653	Working Group for the Initial Complaint Review and Case Mediation Scheme Minute	POL-0023294
142.	POL00026660	Working Group for the Initial Complaint Review and Case Mediation Scheme Meeting Minutes of 24/04/2014	POL-0023301
143.	POL00026663	Minute - Initial Complaint Review and Mediation Scheme - Working Group 1 May 2014	POL-0023304
144.	POL00043627	Initial Complaint Review and Mediation Scheme Working Group - Minute of meeting dated 6 May 2014.	POL-0040130
145.	POL00026657	Working Group for the Initial Complaint Review and Case Mediation Scheme - Minutes of case conference call 15 May 2014.	POL-0023298
146.	POL00026659	Minute of Initial Complaint Review and Mediation Scheme - Working Group 20 May 2014	POL-0023300
147.	POL00026667	Meeting Minutes for the Working Group for the Initial Complaint Review and Case Mediation Scheme	POL-0023308
148.	POL00026668	Working Group for the Initial Complaint Review and Case Mediation Scheme - Working Group Minute - 5th June	POL-0023309

<u>No.</u>	<u>URN</u>	<u>Document Description</u>	<u>Control number</u>
149.	POL00026664	Working Group for the Initial Complaint Review and Case Mediation Scheme Meeting Minutes - 12th June.	POL-0023305
150.	POL00026673	Minute - Initial Complaint Review and Mediation Scheme - Working Group 16 June 2014	POL-0023314
151.	POL00026665	Working Group for the Initial Complaint Review and Case Mediation Scheme - Minute of Working Group Call 26 June 2014	POL-0023306
152.	POL00026672	Minute - Working Group for the Initial Complaint Review and Case Mediation Scheme - 10th July 2014	POL-0023313
153.	POL00026671	Working Group for the Initial Complaint Review and Case Mediation Scheme - Minutes of the Working Group Call 17 July 2014	POL-0023312
154.	POL00026683	Working Group for the Initial Complaint Review and Case Mediation Scheme Meeting Minutes of 24 July 2014	POL-0023324
155.	POL00026674	Minute - Working Group for the Initial Complaint Review and Case Mediation Scheme - 31st July 2014	POL-0023315
156.	POL00026676	Minute - Working Group for the Initial Complaint Review and Case Mediation Scheme - 28 August 2014	POL-0023317
157.	POL00026679	Working Group for the Initial Complaint Review and Case Mediation Scheme - Meeting Minutes (04/09/14).	POL-0023320
158.	POL00026680	Minutes - Working Group for the Initial Complaint Review and Mediation Scheme - 11 September 2014	POL-0023321
159.	POL00026685	Working Group for the Initial Complaint Review and Case Mediation Scheme Meeting Minutes - 16.09.14.	POL-0023326
160.	POL00043628	Standing Agenda for Thursdays calls - Working Group for the Initial Complaint Review and Case Mediation Scheme (25/09/14).	POL-0040131

<u>No.</u>	<u>URN</u>	<u>Document Description</u>	<u>Control number</u>
161.	POL00026684	Minute - Working Group for the Initial Complaint Review and Case Mediation Scheme - 02 October 2014	POL-0023325
162.	POL00040144	Email from David Oliver to Andrew Parsons, RE: As discussed.	POL-0036626
163.	POL00040146	Working Group Briefing Note 30 April	POL-0036628
164.	POL00040151	Email from David Oliver to Andrew Parsons, RE: Briefing Note	POL-0036633
165.	POL00040152	Working Group 30 April Briefing Note	POL-0036634
166.	POL00040153	Email from David Oliver to Chris Aujard, Belinda Crowe, RE: Working Group 30 April Briefing Note	POL-0036635
167.	POL00040154	Post Office Briefing Note, Working Group	POL-0036636
168.	POL00101297	Email from Belinda Crowe to Mark R Davies, Belinda Crowe, Melanie Corfield and others re: FW: E-mail to Working Group	POL-0100880
169.	POL00040282	Email from Tom Wechsler to Chris Aujard, Rodric Williams, Andrew Parsons and others, RE: Briefing Note Working Group	POL-0036764
170.	POL00108268	Email from Belinda Crowe to Theresa Iles, Amanda A Brown, cc Martin Edwards and others re Meeting between Paula and Sir Anthony Hooper about progress on the Mediation Scheme the Working Group	POL-0110967
171.	POL00100324	Annotated Agenda, Sir Anthony Hooper.	POL-0099907
172.	POL00002329	Email chain between Chris Holyoak, Ron Warmington, Ian Henderson and others re: the draft letters to Aver and Howe and Co	VIS00003343
173.	POL00116536	Email chain from Mark R Davies to David Oliver, Sophie Bialaszewski and Belinda Crowe re: JA Handling Plan (to be provided shortly on Egress)	POL-0114597
174.	POL00116544	Email from Paula Vennells to Martin Edwards. Re: Letter from Tony Hooper to Jenny Willott	POL-0117472

<u>No.</u>	<u>URN</u>	<u>Document Description</u>	<u>Control number</u>
175.	POL00108528	Email from David Oliver to Anthony Hooper, Amanda A Brown, Theresa Iles, and Sarah Paddison re Meeting with Paula and Chris	POL-0110989
176.	POL00021844	Email from Andrew Parsons to Belinda Crowe and Chris Aujard re: Mediation for M)22 and M127	POL-0018323
177.	POL00101053	Email from Belinda Crowe to Sophie Bialaszewski, Mark R Davis, Chris Arnold and others re: FW Post Office - proposed July meeting	POL-0100636
178.	POL00040221	Email from Andrew Parsons to Belinda Crowe and David Oliver, RE: "letter to Tony re Part 2"	POL-0036703
179.	POL00040233	Email from Rodric Williams to David Oliver, Andrew Parsons, Belinda Crowe, RE: Email to Tony	POL-0036715
180.	POL00075193	Email from Chris Lucy Overhill to Chris Aujard CC David Oliver, Belinda Crowe and Others RE: Letter from chair M001, M002, M019, M035, M052, M066, M079 & M143	POL-0071756
181.	POL00065213	Letter from Sir Anthony Cooper (Working Group) to Chris Aujard Re Initial complaint review and mediation scheme part two report	POL-0061692
182.	POL00101305	Email from Belinda Crowe to Paula Vennells, Chris Aujard, David Oliver and others re: Re: Sparrow update	POL-0100888
183.	POL00040263	Email from Georgia Barker to Chris Aujard, Re: Letter from Chair-Mo17&MO21	POL-0036745
184.	POL00040264	Letter from Sir Anthony Hooper to Mr. Aujard, Initial Complaint Review and Mediation Scheme ("the Scheme"): Case M017	POL-0036746
185.	POL00040265	Post Office Mediation Scheme@DRAFT@Second Sight - Case Review Report(Baljit Singh SETHI)	POL-0036747
186.	POL00040266	Letter from Sir Anthony Hooper to Mr. Aujard, RE: Initial Complaint Review and Mediation Scheme (Case M021)	POL-0036748

<u>No.</u>	<u>URN</u>	<u>Document Description</u>	<u>Control number</u>
187.	POL00040267	Post Office Mediation Scheme@DRAFT@Second Sight - Case Review Report(Sunil Khanna)	POL-0036749
188.	POL00136853	Email from Georgia Barker to Chris Aujard cc: Belinda Crowe, David Oliver and others. RE: Letter from Chair- M065	POL-0125406
189.	POL00116500	Email from David Oliver to Chris Aujard, Chris Day, Neil Hayward and others RE: meeting of ExCo Sub Committee	POL-0117434
190.	POL00116501	Letter from PV to Alan Bates re: response to letter to minister for postal and regulatory affairs	POL-0117435
191.	POL00116507	Email chain from Sophie Bialaszewski to Jane Hill, Nina Arnott and Mark R Davies Re: FW: Letter form the Minister for Employment Relations and Consumer Affairs	POL-0117439
192.	POL00116521	Email from Belinda Crowe to Mark R Davies, Paula Vennells, Martin Edwards and others re: Alan Bates Letter.	POL-0117453
193.	POL00040145	Letter from Alan Bates to Jo Swinson, RE: Justice for SPMs Alliance	POL-0036627
194.	POL00006554	Email from Andrew Parsons re SS Report	POL-0017648
195.	POL00006555	Draft Report on Branch Operating Procedures Prepared by SS	POL-0017649
196.	POL00004439	Initial Complaint Review and Mediation Scheme - Briefing Report - Part One - Prepared by Second Sight	VIS00005507
197.	POL00006552	Email from Andy Parsons re Draft SS Thematic Report	POL-0017646
198.	POL00006553	Draft Thematic Issues Report	POL-0017647
199.	POL00100479	Email from David Oliver to Paula Vennells re Partial draft thematic report	POL-0100062
200.	POL00021934	Email from Ron Warmington to Angela Van Den Bogerd, Belinda Crowe and Chris Holyoak re: Second Sight Briefing Report Part Two	POL-0018413

<u>No.</u>	<u>URN</u>	<u>Document Description</u>	<u>Control number</u>
201.	POL00021909	Email from Sarah Haywood to Andrew Parsons, CC Angela Van-Den-Bogerd, Phil Bowdery and Mark Wood, re: Second Sight Briefing Report - Part two	POL-0018388
202.	POL00022149	Email from Belinda Crowe to Andrew Parsons, Angela Van Dan Bogerd and others regarding Second sight part two report	POL-0018628
203.	POL00132931	Email from Belinda Crowe to Jessica Madron, cc Piero D'Agostino, Chris Aujard and others - RE: Part 2 Report - 5 August 2014 DRAFT	POL-0136268
204.	POL00021916	Email from David Oliver to Belinda Crowe, Andrew Parsons and Matther Fielden re: I will print hard copies.	POL-0018395
205.	POL00040210	Email from Andrew Parsons to Belinda Crowe, David Oliver, RE: Part 2 Appendix-letter to second sight re Part 2 Preliminary Comments	POL-0036692
206.	POL00021904	Email from David Oliver to Angela Van Den Bogerd, Jessica Madron, Andrew Parsons and others re: DRAFT Letter to Second Sight re Part 2 Preliminary Comments	POL-0018383
207.	POL00022212	Email from David Oliver to Jonathan Swil and Belinda Crowe regarding the draft letter to second sight re part 2 preliminary comments 12082014	POL-0018691
208.	POL00021866	Email chain between Belinda Crowe, Ron Warmington, Ian Henderson and others, re: Second Sight's Draft Report Part Two Report.	POL-0018345
209.	POL00040491	Second Sight's Draft Part Two Mediation Briefing Report	POL-0036973
210.	POL00021954	Initial Complaint Review and Mediation Scheme BRIEFING REPORT - PART TWO PREPARED BY SECOND SIGHT@(Draft)	POL-0018433
211.	POL00021953	Email from Andrew Parsons to Angela Van-Den-Bogerd, Rodric Williams, Belinda Crowe and David Oliver re: Part 2 Report	POL-0018432

<u>No.</u>	<u>URN</u>	<u>Document Description</u>	<u>Control number</u>
212.	POL00021922	Email chain between Andrew Parsons, David Oliver, Belinda Crowe, Melaine Corfield and others re: Responding to the Part Two Report	POL-0018401
213.	POL00123336	Email from Rob King to Andy Hayward cc Dave Posnett re Second Sight Part Two Report.	POL-0129535
214.	POL00021773	Email chain between Paul Inwood, Belinda Crowe, Dave Hulbert and others re: Second Sight Part Two.	POL-0018252
215.	POL00021886	Email from Kim Abbotts to Andrew Pheasant re: Second SIGHT Part Two	POL-0018365
216.	POL00132933	Email from Belinda Crowe to Angela Van-Den-Bogerd, Andrew Parsons, Rodric Williams and others, RE: Latest Draft POL Letter to SS Part Two Recipients	POL-0136270
217.	POL00027113	Email from Belinda Crowe to Angela van den bogerd and others RE Message from Angela Van Den Bogerd	POL-0023754
218.	POL00040252	Email from Parsons Andrew to David Oliver, Draft Logic Note-Part Two Report	POL-0036734
219.	POL00040253	LOGIC NOTE re: Circulation of the second sight part two report.	POL-0036735
220.	POL00021763	Email from Andrew Pheasant to Rod Ismay re: Second Sight Part Two - ATM and other bits of sections 2	POL-0018242
221.	POL00022240	Email from Belinda Crowe to Chris Aujard regarding second sight part two - introductory section	POL-0018719
222.	POL00148981	Email chain from David Oliver @To: Andrew Parsons CC Angela Van-Den-Bogerd and Melanie Corfield Re Response to Second Sight Part 2 report DO comments + Brunswick comments	POL-BSFF-0008101
223.	POL00148982	Draft response to Second Sight's initial complaint review and mediation scheme briefing report part 2	POL-BSFF-0008102

<u>No.</u>	<u>URN</u>	<u>Document Description</u>	<u>Control number</u>
224.	POL00100134	Meeting with Alice Perkins, Paula Vennells and David Oliver	POL-0099717
225.	POL00116250	Email chain from David Oliver to Martin Edwards, Belinda Crowe and Chris Aujard re. Draft note for Paula.	POL-0117244
226.	POL00100200	Letter from David Oliver to Paula Vennells, RE: Second Sight.	POL-0099783
227.	POL00116255	Email from Mark Davies to David Oliver re Second Sight and James Arbuthnot.	POL-0117249
228.	POL00116276	Success Criteria Document - SS	POL-0117269
229.	POL00116270	Email from Martin Edwards to Paula Vennells re David's Sparrow Note which relates to Second Sight's engagement	POL-0117263
230.	POL00116279	Email chain from Martin Edwards to Belinda Crowe, David Oliver, Amanda A Brown 'and others' re: Next Monday ExCo	POL-0117272
231.	POL00074462	Email from Andrew Parsons to Chris Aujard, Rodric Williams, David Oliver, and others re: M001 - Initial Thoughts [BD-4A.FID25886824] - Second Sight Report	POL-0071025
232.	POL00108377	Email from Belinda Crowe to Sarah Paddison RE URGENT: Sparrow Update	POL-0110979
233.	POL00040290	File Note from Second Sight meeting with POL. Records discussions including work rate and cost per case.	POL-0036772
234.	POL00038633	Draft note from Chris Aujard (GC) to Post Office Board Ltd	POL-0027944
235.	POL00100136	Email thread from Paula Vennells to Alice Perkins re: Further Briefing Tomorrow	POL-0099719
236.	POL00040062	Email from Andrew Parsons to Hugh Flemington, RE: Re-drafted draft prosecutions paper	POL-0036544
237.	POL00027760	Email from Chris M Day to Alwen Lyons, Chris Aujard, Fay Healey and others re Prosecution Policy Paper	POL-0024401

<u>No.</u>	<u>URN</u>	<u>Document Description</u>	<u>Control number</u>
238.	POL00123176	Email from John Scott to Sophie Bialaszewski, Belinda Crowe, David Oliver and others re: Investigation Review Meeting - Criminal Investigations Policies and Guidance	POL-0129381
239.	POL00021424	Post Office Limited Audit, Risk and Compliance Sub Committee Minutes of 11/02/2014	POL-0018054
240.	POL00030716	Post Office Audit, Risk and Compliance Committee, Prosecutions Policy Appendix A, Chris Aujard, February 2014	POL-0027198
241.	POL00116258	Email chain from Belinda Crowe to David Oliver, Chris Aujard, Martin Edwards and Mark Davies Re: URGENT Prosecutions policy and MPs meeting etc.	POL-0117251
242.	POL00027754	Email from Alwen Lyons to Chris Aujard, Chris M Day, Kevin Gilliland and others re Draft Prosecution Paper for the Board	POL-0024395
243.	POL00027755	POL Board Paper - Review of the Current Prosecution Policy - Chris Aujard.	POL-0024396
244.	POL00038644	Note from Chris Aujard to POL Board re-PO Prosecution Policy	POL-0027955
245.	POL00027451	POL Board: Review of the Current Prosecution Policy, version February 2014	POL-0024092
246.	POL00123322	Email chain from Victoria Brooks to Dave Posnett, Belinda Crowe, Andrew Parsons and others@re: Pensions & Allowances 'Reintroduction' Fraud - Confidential [BD-4A.FID20472253]	POL-0129521
247.	POL00040056	Email from Sophie Bialaszewski to Ruth Barker, Belinda Crowe, David Oliver etc, RE: Initial Complaint Review and Mediation Scheme QA SB Comments 06.01.2013	POL-0036538
248.	POL00044356	Email from Jarnail Singh to Martin Smith, RE: bulletpoints on the evidence in R v. Misra	POL-0040835
249.	POL00101295	Email from Cathal Wogan to Belinda Crowe, Mark R Davies, Carmel McCarthy and others re: RE: Request for an Interview	POL-0100878

<u>No.</u>	<u>URN</u>	<u>Document Description</u>	<u>Control number</u>
250.	POL00101316	Email from Mark Davies to David Oliver, Chris Aujard and Gavin Lambert re: FW: You & Yours	POL-0100899
251.	POL00101361	Email from Angela-Van-Den-Bogerd, to Richard Weaver, Mark Davies and others re: The news	POL-0100944
252.	POL00101362	Email from Mark Davies to Bryan Hewson re: The news	POL-0100945
253.	POL00108232	Email from Martin Edwards to Theresa Iles and Sarah Paddison re Briefing pack for the meeting with James Arbuthnot	POL-0110960
254.	POL00100124	Letter from Belinda Crowe to Chairman and Chief Executive, Post Office Limited cc: Chris Aujard RE: Briefing for Meeting with RT Hon James Arbuthnot MP	POL-0099707
255.	POL00100126	Email from David Oliver to Alice Perkins, Jorja Preston, Paula Vennells cc: Theresa Lies, Marin Edwards, Sarah Paddison re: Meeting with JA Tomorrow attachment: Agenda for JA Meeting	POL-0099709
256.	POL00100128	Email from David Oliver to Alice Perkins, Jorja Preston, Paula Vennells cc: Theresa LLes, Martin Edwards, Sarah Paddison and others re: Meeting with JA Tomorrow re: Agenda for JA Meeting pdf	POL-0099711
257.	POL00100144	Email chain from Alice Perkins to David Oliver and Paula Vennells re: Further Briefing for Tomorrow	POL-0099727
258.	POL00116246	Agenda for the meeting between Alice Perkins, Paula Vennells and David Oliver	POL-0117240
259.	POL00116247	Letter from Chris Aujard (General Counsel) to Chair and Chief Executive Post Office Limited; Re: Further Briefing for James Arbuthnot Meeting	POL-0117241
260.	POL00100142	Email from Chris Aujard to Angela Van-Den-Bogerd cc: Paula Vennells re: URGENT	POL-0099725
261.	POL00100141	Email thread from Martin Edwards to Paula Vennells re: Further briefing for tomorrow	POL-0099724

<u>No.</u>	<u>URN</u>	<u>Document Description</u>	<u>Control number</u>
262.	POL00100203	Email from David Oliver to Janet Walker, RE: Post Office-proposed meeting	POL-0099786
263.	POL00108257	Email from Martin Edwards to Paula Vennells and Theresa Iles cc: Sarah Paddison re Post Office - proposed meeting	POL-0110963
264.	POL00100191	Email from David Oliver to Paula Vennells, RE: MP's meeting	POL-0099774
265.	POL00108351	Email from Louise Chatfield To Theresa Lies RE Urgent James Arbuthnot MP's meeting	POL-0110974
266.	POL00100210	Email from Belinda Crowe to Alice Perkins, RE: Next steps following meeting with James Arbuthnot	POL-0099793
267.	POL00100226	Email from David Oliver to Martin Edwards, Mark R Davies RE: FW: Draft Meeting note and letter	POL-0099809
268.	POL00100254	Email from David Oliver to Belinda Crowe, Sophie Bialaszewski, RE: FW: Post office update meeting, Monday 24 March at 5:45pm	POL-0099837
269.	POL00077180	Email from Belinda Crowe to Mark R Davies, Chris Aujard, Rodric Williams and others re: FW: MPs - forwarding note to MPs issued in 2014	POL-0073743
270.	POL00116325	Email to Belinda Crowe, Mark R Davies, Jane Hill and others from Sophie Bialaszewski Re: Briefing note for Paula (to go to Alice Monday)	POL-0117318
271.	POL00108341	Email from David Oliver to Belinda Crowe RE Phone Call between James and Paula	POL-0110972
272.	POL00116340	Email from David Oliver to Mark R Davies, Martin Edwards, Chris Aujard and others re: Note for PV call with JA 18032014.docx	POL-0117333
273.	POL00130527	Email from Sophie Bialaszewski to David Oliver, Belinda Crowe re Briefing Paper for Paula	POL-0124108
274.	POL00116344	Email from David Oliver to Martin Edwards, Theresa Iles, Sarah Paddison and others re: Note for PV call with JA 18032014 Final.	POL-0117337

<u>No.</u>	<u>URN</u>	<u>Document Description</u>	<u>Control number</u>
275.	POL00108346	Letter from David Oliver to Paula Vennells RE Note for call with James Arbuthnot - 18 March	POL-0110973
276.	POL00100445	Email from David Oliver to Janet Walker re. draft email and prep for 24th	POL-0100028
277.	POL00116353	Email chain from Belinda Crowe to Martin Edwards, Mark R Davies and Chris Aujard@RE: James Arbuthnot	POL-0117346
278.	POL00116356	Email chain from Belinda Crowe to Mark R Davies, Martin Edwards, David Oliver and others RE: James Arbuthnot	POL-0117349
279.	POL00116351	Email from Sophie Bialaszewski to Mark R Davies, Belinda Crowe cc: David Oliver re: Briefing with POAC MP names	POL-0117344
280.	POL00116367	Email from Mark R Davies to Paula Vennells cc Martin Edwards, Chris Aujard 'and others' re: MPs Meeting	POL-0117360
281.	POL00116381	Email chain with Belinda Crowe, Paula Vennells, Chris Aujard and others - Re: Draft approved by James for MPs' Meeting	POL-0117374
282.	POL00116334	Draft Briefing for POL Chairman and Paula Vennells, for Meeting with James Arbuthnot, MPs, JFSA and Second Sight - Version 6	POL-0117327
283.	POL00116382	Email from Sophie Bialaszewski to Mark R Davies and Ruth X Barker re: response to Priti Patel's letter by Paula Vennells	POL-0117375
284.	POL00027700	Email from Mark R Davies to Paula Vennells, Martin Edwards, David Oliver and others RE: Questions about the briefing	POL-0024341
285.	POL00116407	Email from Chris Aujard to Mark R Davies, David Oliver, Angela Van-Den-Bogerd and others re Confidential - MP Meeting	POL-0117391
286.	POL00116413	Email from Theresa Iles to Martin Edwards, Chris Aujard, David Oliver 'and other' re: FW: James Arbuthnot MP Letter 310314	POL-0117397
287.	POL00100506	Email from Belinda Crowe to Paula Vennells re: Letter to James Arbuthnot v2	POL-0100089

<u>No.</u>	<u>URN</u>	<u>Document Description</u>	<u>Control number</u>
288.	POL00116436	Email from Paula Vennells to Mark R Davies, Belinda Crowe, Chris Aujard 'and others' - Re: JA Response	POL-0117420
289.	POL00025801	Post Office Limited Board Sub Committee - Initial Complaints Review and Mediation scheme Ministerial Commitments	POL-0022280
290.	POL00116530	Email from Louise Chatfield to Mark Davies cc Sophie Bialaszewski re James Arbuthnot letter	POL-0117460
291.	POL00116531	Email chain from Mark R Davies to David Oliver, Sophie Bialaszewski, Mark R Davie and others re James Arbuthnot Letter	POL-0117461
292.	POL00116549	Draft letter from Paula Vennells to Ms Willott re response to letter and letter from Alan Bates - Operational concerns	POL-0117477
293.	POL00116550	Draft letter from Paula Vennells to James Arbuthnot re Initial Complaint Review and Mediation Scheme - Interim report, progress to date, Alan Bates' letter	POL-0117478
294.	POL00116551	Email from Martin Edwards to Belinda Crowe, David Oliver ¹ , Mark R Davies, cc Chris Aujard re updated letters to James Arbuthnot and Ms Willott	POL-0117479
295.	POL00116552	Letter from PV to Ms Willott re Alan Bates.	POL-0117480
296.	POL00116553	Draft Letter To James Arbuthnot	POL-0117481
297.	POL00116563	Draft Letter to James Arbuthnot re the Mediation Scheme and MPs involvement.	POL-0117491
298.	POL00100737	Email from Belinda Crowe to David Oliver, Sophie Bialaszewski, Letter from James Arbuthnot MP	POL-0100320
299.	POL00100695	Letter from James Arbuthnot to Paula Vennells, Mediation process case review	POL-0100278
300.	POL00131522	Email from Matthew Fielden to Rodric Williams, Cc David Oliver re Ministerial Commitments & Working Group ToR etc.	POL-0121343

<u>No.</u>	<u>URN</u>	<u>Document Description</u>	<u>Control number</u>
301.	POL00131534	ToR - Ministerial Commitments, Detail of scheme as published, Working group ToR (not published), Journey to the WG and Scheme,	POL-0121355
302.	POL00116584	Email from David Oliver to Chris Aujard and Mark Davies, RE: Signed copy of James Arbuthnot Letter	POL-0117509
303.	POL00100891	Email sent from Melanie Corfield to Belinda Crowe, Sophie Bialaszewski and others re : Draft note to Mps	POL-0100474
304.	POL00116593	Email from Belinda Crowe to Avene O'Farrell, Chris Aujard, Mark R Davies and others re Draft note to MPs	POL-0117518
305.	POL00116661	Email from Chris Aujard to Sophie Bialaszewski, Belinda Crowe, Avene O'Farrell and others re urgent letter from James Arbuthnot.	POL-0117534
306.	POL00116668	Email from Mark R Davies to Belinda Crowe, Martin Edwards, Melanie Corfield and others Re: Urgent; Letter from James Arbuthnot, POL draft response	POL-0117541
307.	POL00116679	Email from Belinda Crowe to Sophie Bialaszewski, Martin Edwards, Avene O'Farrell and others RE: Draft email from James Arbuthnot to MPs	POL-0117552
308.	POL00101054	Email from Martin Edwards to Paula Vennells, Belinda Crowe, Sophie Bialaszewski and others re: FW Draft email from James Arbuthnot to MPs	POL-0100637
309.	POL00109115	Email chain from Avene O'Farrell to David Oliver re: Rt Hon James Arbuthnot MP letter®	POL-0111027
310.	POL00109203	Email from Avene O'Farrell to David Oliver and Tom Wechsler re: Letter for James Arbuthnot	POL-0111031
311.	POL00109204	Letter from Paula Vennells to Rt Hon James Arbuthnot MP re: Working Group Meetings.	POL-0111032

<u>No.</u>	<u>URN</u>	<u>Document Description</u>	<u>Control number</u>
312.	POL00105556	Email from Tom Wechsler to Samikah Ahmed, Re: Subject Mediation Scheme	POL-0105123