

**Conf Call with SC, Al and IRH re Paula briefing**

**SUSAN:** ... had a chat with Paula earlier on and we had a couple of chats this morning, Ron and Ian, and then separately I've had chats with Alwen so I just thought we should probably come back together and try to see if we can move this forward.

So Paula agrees that the original scope of the investigation did not go as far as looking at whether -- it was the miscarriage of justice point, Ron and Ian. So that's -- that's not what she's looking for. She's just -- she's looking for a systematic -- or systemic, rather, not systematic -- systemic weakness in the Horizon System, but not -- as I said, didn't go on to that next point around whether or not it's called a miscarriage of justice or a suspension of a subpostmaster, because I think that's -- once you have found it, it's up for us to look for and see what impact it might be if that happens.

**RON WARMINGTON:** Yeah.

**SUSAN:** Is that okay?

**IAN HENDERSON:** That makes a lot of sense.

**SUSAN:** Right. So that's the first thing.

The second thing, and Paula and I did get -- talk ourselves round in a complete circle on this, despite me desperately trying to turn it into a square, I think -- so two things, right, and this is what I'd like us to focus on on this call. Firstly, she's obviously got a call with James tomorrow at 10.30. I don't think either of us actually know where James is. I think the one thing that's probably come out of the conversation, more so with Second Sight than anybody else, but Alwen you can say whether it's -- and Janet as well -- the

need to somehow have a plan to close down this process. I mean, even to the extent of stopping MPs sending cases in now --

**ALWEN LYONS:** Yes.

**SUSAN:** So it's how do we close down the MPs' side of the process and what would work for MPs and what could we sell to MPs and how quickly can we do that and what does that look like, in terms of both the work you and Second Sight need to do and the outcomes, and then --

**IAN HENDERSON:** Susan, sorry to interrupt but the other element of that is what I might call work in progress items where subpostmasters or former subpostmasters have claimed that they've referred cases to their MP but that MP has not yet forwarded it to James' office and therefore we don't know about it.

**SUSAN:** Yeah, so I think we almost need a sort of policy which says: look, if they have not forwarded it to the office, then obviously it can go through the standard Post Office system; what can't do is go through the Second Sight system.

**RON WARMINGTON:** Yes.

**ALWEN LYONS:** Do we have any idea how many we're talking about?

**RON WARMINGTON:** I think it's five new ones. So I put that in an email yesterday. Let me just haul it up.

There were -- Alan advised us of seven names, I think, and two of them have just come in -- did actually come in, the other ones we were talking about -- having just -- one was McQuillan and then there's another one, Gail Ward, but there were five other names on that list we didn't know anything about.

**IAN HENDERSON:** But a related element to that, of course,

is cases that have come in where we've just got, you know, no submissions and no information.

**SUSAN:** So they were going to be my next, sort of, tranche, is -- I think one thing that Paula needs to explain to James is that we can't -- do you mean no information from them?

**IAN HENDERSON:** Yes.

**SUSAN:** We have no information because you've asked us.

**RON WARMINGTON:** We've got both situations. We've also got the Seema Misra case where I can't get hold of her despite -- no matter how I try to get hold of her.

**ALWEN LYONS:** Well ...

**SUSAN:** So we've got cases where the MP has said, "I've got a case" --

**RON WARMINGTON:** Yep.

**SUSAN:** -- but then we can get no evidence; is that right?

**ALWEN LYONS:** Yes. These are from the subpostmaster or from us.

**RON WARMINGTON:** Not quite correct. We haven't gone back to the subpostmasters to say, "You haven't submitted anything of any quality or anything at all other than, at kind of best, a handwritten note," you know, to -- "do submit more." And the reason we haven't done that is because we said we would not make those approaches until we'd looked at the documentation from the Post Office.

**IAN HENDERSON:** But, Ron, you are muddling various sort of categories. What we did say to Janet -- we gave Janet some months ago, as in February, the specification agreed with the JFSA, which we regard as the minimum necessary to, sort of, enter the

process. In other words --

**RON WARMINGTON:** Yep.

**IAN HENDERSON:** -- clearly set out, sort of, Statement of Claim and what the issues are and so on.

**RON WARMINGTON:** Yep.

**IAN HENDERSON:** Janet agreed that, you know, she would ensure that MPs and SPMRs delivered that as their input to the process.

**RON WARMINGTON:** Right. I've seen no evidence that that has happened.

**IAN HENDERSON:** Yeah, we've not reached that standard in a significant number of cases.

**RON WARMINGTON:** I don't think we've received it in any case.

**SUSAN:** How many?

**RON WARMINGTON:** I don't think we received that in any -- we haven't had any cases that have got -- where they've submitted documentation.

Well, perhaps Lee Castleton has submitted a huge heap of data but it's -- there's no sort of Statement of Case. It's just a kind of heap of stuff. The only one that's articulated anything sensibly is Alan, Alan Bates.

**IAN HENDERSON:** But, Ron, you came up with a number this morning that was -- was it 17 or something? -- where we have in essence got virtually nothing.

**RON WARMINGTON:** Yes.

**SUSAN:** 17 out of 29?

**RON WARMINGTON:** I think it's 15 actually. 15 out of 29 where we've got effectively nothing.

Pardon?

**SUSAN:** Have you got -- have you got the list of those cases, the actual names?

**RON WARMINGTON:** Yep. Yeah, we've -- I'll send a fresh version of the spreadsheet that we've sent to Simon that's got that summary in it.

**IAN HENDERSON:** Ron, don't send the spreadsheet. It's easier to deal with an email. You know, list the people in an email.

**RON WARMINGTON:** All right, okay.

**SUSAN:** So we're saying that you would have liked to have carried on that investigation but you were unable to do so because there isn't enough evidence. Is that what we're saying?

If I say this to James -- or Paula says this to James tomorrow, it has to be factual, doesn't it?

**RON WARMINGTON:** I wouldn't say we'd like to. We -- we're as committed to --

**SUSAN:** You're unable to.

**RON WARMINGTON:** Yeah, we're as committed to wrapping this up as you are.

**SUSAN:** Yeah, yeah.

**RON WARMINGTON:** Yeah, so we have been unable to, yeah.

**SUSAN:** (unclear) quite saying I think we have an aligned interest.

**RON WARMINGTON:** Yeah, good.

**ALWEN LYONS:** Yes. Yes, absolutely.

**SUSAN:** Sorry, Ron, I shouldn't have interrupted you.

**RON WARMINGTON:** No, all right. I will send -- getting back to it again, I will send a list of names of those where we've -- I'll give you a little summary that says where we've received nothing at all from the SPM and where we've received nothing at all from POL, in some cases. Tick both boxes.

**SUSAN:** Okay.

**RON WARMINGTON:** Does that worry me? Not particularly because --

**IAN HENDERSON:** But, Ron, we ought to look at it from a James sort of perspective --

**SUSAN:** Yeah.

**IAN HENDERSON:** -- and not muddy the waters by introducing POL issues. You know, let's deal, in this category, with cases from SPMRs, you know, where they/their MP have not delivered what is necessary.

**RON WARMINGTON:** Okay. Yeah.

**SUSAN:** So how many do you think those are?

**RON WARMINGTON:** 15 probably.

**SUSAN:** Right. So that out of the 29?

**RON WARMINGTON:** Yes.

**SUSAN:** Or out of 20?

**RON WARMINGTON:** Out of what is now the 31, because we had two more added.

**SUSAN:** Yeah, okay.

Okay, so those two added were the ones that came in yesterday?

**RON WARMINGTON:** Yes.

**SUSAN:** So I think there are two policy things, Alwen, we need to be clear about. One is that if claims are now coming in, (unclear) don't(?) believe they should go to the Second Sight process, (unclear) expense, et cetera. We are absolutely, you know, committed to investigate them through the POL process.

**ALWEN LYONS:** Yeah.

**SUSAN:** And they go through our standard process, and then we -- the response was vetted by senior management.

**ALWEN LYONS:** Yeah.

**SUSAN:** That's important.

Don't say "by legal", because I just think they all (unclear) defend ourselves, but it's (unclear) senior management, so --

**ALWEN LYONS:** Yeah.

**SUSAN:** So the first policy is I think we need a bit of history, because I'm really thinking the briefing paper for Paula here to talk --

**ALWEN LYONS:** Yeah, so am I.

**SUSAN:** So I'd like to just try to show James, we've now got 31 cases that have come via your office, two came only yesterday. We don't think that it's right they should be included in the Second Sight sample because too late. Happy -- obviously happy to investigate them from the POL point of view, if she can land that and say anything else that comes in post whatever, the end of April or -- or from today or tomorrow, doesn't go into the Second Sight hopper.

**ALWEN LYONS:** Yeah.

**SUSAN:** Secondly, of those 29 --

**ALWEN LYONS:** Yeah.

**SUSAN:** -- 15 haven't supplied the information, so Second Sight can't investigate them, so we believe they should come off the list, which then takes you down to, what, 14, is it, then, Ron?

**RON WARMINGTON:** Yeah, about that. Yeah.

**IAN HENDERSON:** Susan, just to pick up what Second Sight can't investigate, that's qualified by -- you know, without a lot of extra work such as going out, interviewing SPMRs and almost writing up their case on their behalf.

**SUSAN:** I think that's really important. Alwyn --

**ALWEN LYONS:** In your email, Ron, can you put a sentence that you would be happy for me to say about Second -- or Paula to say about Second Sight as to why you couldn't take those forward, because I don't want to put words in your mouth, I'd rather you saying what you are happy that we can say.

**RON WARMINGTON:** Yep. Okay.

**IAN HENDERSON:** What we might do is refer to the paragraph that was in the JFSA agreement which actually set out the -- you know, the documentation standard.

**SUSAN:** Well, I think that -- yeah, okay.

So that takes us to 14 cases then on the (interference) list. Of those 14, how far have you got with those 14? Is that the summary that you sent through to Simon -- oh, I don't know, because I've been off -- three weeks ago now?

**RON WARMINGTON:** Yes. That's 14 cases where we've got what we assess to be 70 or better per cent

completion of the case, where we --

**SUSAN:** When you say "completion of the case", do you just mean subpostmaster evidence, or do you mean completion of the case?

**RON WARMINGTON:** I mean -- I mean that we've carried out the investigation work based on what POL has submitted as documentation, plus what the SPMRs submitted, plus the interview but -- and where we have got it, we've looked at the spot review response and/or the Horizon data. But those last two steps are thin on the ground. That's why we haven't got anything higher than 90 per cent, I think -- 85 per cent we've got, and 90 on one.

**SUSAN:** So just for my benefit here, if a case is at 90 per cent or even 70 per cent --

**RON WARMINGTON:** Yeah.

**SUSAN:** -- is it going to go any higher or than that or is it just done now and we could actually -- we've got to make a judgement on that 70 per cent?

**RON WARMINGTON:** No, it means that we have documented what the SPMRs says -- asserts, and validated as best we can without looking at the Horizon data, and submitted it, but that we haven't yet got a response from POL and/or we haven't got the underlying data yet to validate or refute the assertion.

**SUSAN:** So you're expecting -- before you could say yes or no or whatever's going on, that 70 has to go up to 100?

**RON WARMINGTON:** Yes, yes.

**SUSAN:** Okay.

**IAN HENDERSON:** There's another element sort of in the paths to completion, which is, you know, reviewing, you know, responses from, sort of, POL. If it is subject to a spot review, probably some, you know,

dialogue in terms of, you know, sort of dealing with those responses, and then finally reaching a conclusion and writing it all up in a mini sort of report.

**RON WARMINGTON:** Now, all that was sort of laid down in a process that we said we were going to deploy from several months ago, ages ago.

**SUSAN:** Yeah.

**RON WARMINGTON:** What was not mentioned and may have upset Paula is the addition of what was entirely logical and predictable but never was articulated, which is to say it makes sense to get Alan Bates' and Kay's approval -- you know, sort of at least discuss -- get their input on those before we absolutely lock in on our conclusion.

**SUSAN:** Okay. So I think that's -- I mean, that's a separate point we need -- if I could, I would just like to follow through --

**RON WARMINGTON:** Yeah.

**SUSAN:** -- so that for Alwyn's benefit in drafting the notes for Paula we can follow the waterfall of the cases from James and to sort of get a very clear understanding about how long you think it would take to get you from the 90 or wherever you are on each case, and that will be slightly different --

**RON WARMINGTON:** Yeah.

**SUSAN:** -- from there to 100 per cent, and then I think we need to come back to the JFSA point.

**RON WARMINGTON:** Yes. And that is where we got to the issue of the suggestion at one point that we drop the 14 down to two or three. But that's forward danger.

**SUSAN:** Can I just be clear about that suggestion. Did that suggestion come from James Arbuthnot?

**ALWEN LYONS:** Yes. I mean, what I think -- I'll tell you what I think and then other people can say what they think I think that was a suggestion made from James to JFSA, and I've not seen any response from JFSA. But the assumption is -- in James' head, is that that is what now is happening.

**SUSAN:** Okay? So Ron and Ian, what do you think?

**IAN HENDERSON:** I think it was slightly more complicated than that and it came up via sort of multiple routes, and this is going back to 25th March meeting where my proposal, which wasn't accepted sort of accepted subsequently by James, was to go for this, sort of, thematic approach. Sort of tied in with that was the, sort of, suggestion that we -- you know, bearing in mind his wish for some further report in July, we said we could either look at the top two or three issues or the, sort of, top two or three sort of cases. So we did actually have that sort of discussion without reaching any conclusion in March.

**SUSAN:** Did you have that with the big meeting then?

**IAN HENDERSON:** Um ...

**RON WARMINGTON:** Well, it was not suggested at the big meeting that we dropped the MP-sourced cases. Had it been there would have been -- I'm sure there would have been an outcry from the MPs representatives and their staff -- or their staff.

**SUSAN:** So would it be a correct summary to say that if we exclude the new cases, the ones where we've got insufficient evidence or lack of evidence, you've looked that 14 they've actually done quite -- we're almost there on most of them. You've still got to finish them off.

**RON WARMINGTON:** Yes.

**SUSAN:** It seems daft -- well, I say it seems daft. My

other question was: how long -- what's your guesstimate of how long it would take you to finish off those 14? And is it delay on Fujitsu or our part that's stopping you finishing up or is it just that we've fiffed and faffed around for the last month, you didn't have a known where to go. And if you were going to take two or three, which -- presumably they would be in that 14?

**RON WARMINGTON:** Yeah, I think it would be it would -- I've never been a supporter of the idea of cutting down to two or three, not least because, as I say, I've already done 14. You know, looking at this, I could -- it might even be 15. I'm not being sloppy about it, I'm just -- I've got one --

**SUSAN:** How long do you reckon it would take you to finish them?

**RON WARMINGTON:** So I've got it broken down to 50 per cent -- it probably could be higher -- however long to finish them.

Ian, that's more your bailiwick, because it's --

**IAN HENDERSON:** Sorry, just to be clear on the question, Susan, the question is how long to finish the sort of 14 or 15? Is --

**SUSAN:** Parking the let's go to two or three for a minute, because I don't know -- I can't work out whether that's a valid argument or not. So we've --

**IAN HENDERSON:** Can I just --

**SUSAN:** -- got 14/15 MPs' cases --

**IAN HENDERSON:** Could I pick up on the two or three point?

I think the only context that the two or three has come up was as an interim sort of measure; in other words, could we not so much report on the totality but could we report on two or three by July. And when that was first raised, I mean, that was a possibility. But my point is that it was only

ever an interim proposal not a finite proposal to only report on two or three, or at least -- (unclear: simultaneous speakers) --

**RON WARMINGTON:** You're correct, Ian. It was sort of mentioned in that context, and only in that context, and I think it probably -- I think it probably did come up from JFSA, because JFSA's always made it clear that they don't particularly care for the MP-sourced cases. They are "more concerned" about the thematic or systemic issues, as he calls them.

**SUSAN:** Okay.

So, sorry, Alwen, what were you going to say?

**ALWEN LYONS:** I was going to say, so could -- so can you, even if we say that it's an interim (unclear), if you like, this two or three, have you got time now to finish two or three and report by -- before recess, which is halfway through July?

**IAN HENDERSON:** I think the question or the issue there is which cases do we pick. We could pick two or three completely rubbish cases that would add very little, sort of, value, and -- and wrap those up, but that's not really sort of dealing with the bigger issue, which is --

**SUSAN:** I'm afraid we might have to, though.

**ALWEN LYONS:** Are those rubbish cases in the 14?

**RON WARMINGTON:** Yes.

**SUSAN:** Yes.

**ALWEN LYONS:** So there's rubbish in the 14 as well?

**SUSAN:** Oh, yes.

**IAN HENDERSON:** Yes. I mean, the MP cases, generally speaking, were far weaker and less value than the JFSA cases.

**SUSAN:** I mean, some of them are really old as well.

**IAN HENDERSON:** Yes.

**RON WARMINGTON:** Having said that, we have -- of the what we call high value cases, where we've been able to assess it, there's only a couple where we're not in the 70s or 80 per cent completed. So they are mostly quite good cases but some are quite simple. The Rudkin one is very, very simple. It comprises one spot review. And, frankly, we've probably got to bottom that out before and assess. It is so important.

**SUSAN:** Not what we want to do.

**ALWEN LYONS:** Well, it might be, but we just don't know, do we, at the moment?

**IAN HENDERSON:** Probably the highest risk one, you know, out of all of them at the moment.

**RON WARMINGTON:** It's probably got to be included.

**SUSAN:** I think it's got to be included. That's the Bracknell one, Alwen.

**ALWEN LYONS:** Yes.

**RON WARMINGTON:** It's the Bracknell one, yeah.

**SUSAN:** So -- sorry, I'm sorry to push you on this, but I know he's going to push us tomorrow.

If we chose that one and three others --

**RON WARMINGTON:** Yes.

**SUSAN:** -- could we get those done and a report before summer recess?

**IAN HENDERSON:** We could produce some form of report. How final it would be I think it's too early to say.

SUSAN: Okay, okay.

ALWEN LYONS: Well, that's okay --

RON WARMINGTON: For example --

SUSAN: (unclear: simultaneous speakers) -- quite a lot of the spot reviews as well.

RON WARMINGTON: For example, the Tracey Ann Merritt case might be included in one of those. We'd have to be very selective about which ones we -- which ones we --

SUSAN: I think you have to have the choice.

RON WARMINGTON: Yes, we would.

SUSAN: Yes, (unclear).

RON WARMINGTON: But it would --

SUSAN: And the other thing is what we don't want is to choose, you know, easy ones for the Post Office, if you like, is what I'm saying, because (1) it might give the wrong answer first and then a different answer later.

RON WARMINGTON: Yeah.

SUSAN: Or it might -- if someone realised, you know, that we've chosen those, because JFSA will see that quite quickly I think.

RON WARMINGTON: Yeah.

SUSAN: They'll just go: oh, well you just chose those three because that was easy.

RON WARMINGTON: Yeah.

IAN HENDERSON: Rather than make a decision on who, shall -- after this call, shall Ron and I come up with a proposal that we think is doable --

**SUSAN:** Please.

**IAN HENDERSON:** -- by the middle of July?

**SUSAN:** I think if you can think about whether -- and we should, I think, given the amount of work that's gone in, we can also, for instance, include the conclusion of the spot reviews.

**RON WARMINGTON:** Yes, we'd have to. We can't -- you know, we couldn't professionally close out a case --

**SUSAN:** So that's what I'm saying. I think you would have to write it as an interim report anyway.

**RON WARMINGTON:** Yeah.

**SUSAN:** But could we include some of the spot reviews as well as the cases maybe? Don't know.

**RON WARMINGTON:** Oh, I see what you mean, yeah.

**IAN HENDERSON:** But again, Susan, that's raising a bigger question because the spot reviews were aligned more with the thematic approach, putting them into sort of categories, you know, which is very different from reporting on cases which are, you know, unique to an individual, and many --

**SUSAN:** Okay, okay, sorry, that's not a good idea then. So that's the two or three.

**ALWEN LYONS:** Yeah.

**SUSAN:** Then what sort of timeline are we looking at to finish the whole thing, the 14, 15 whatever it is?

**IAN HENDERSON:** Probably another three months after July.

**SUSAN:** September?

**IAN HENDERSON:** Yeah.

**SUSAN:** But won't we need to think about whether we can speed stuff up, whether it's us that's delaying things or --

**RON WARMINGTON:** Yeah, I mean, for example, we've said that it would be a lot faster if we could pursue a sort of iterative path on the spot review responses rather than waiting for, you know, a six-page answer that itself then requires deep study and response.

**SUSAN:** Well, but --

**RON WARMINGTON:** Yeah, no, I know, (unclear) arguments the other way.

**IAN HENDERSON:** Also, frankly, we could be a lot more aggressive in terms of bringing to your attention sort of delays in the system, you know, when we've bashed something out and it takes six weeks for, you know, a substantive reply to come back.

**SUSAN:** Yeah, you need to be shouting to me (unclear).

**RON WARMINGTON:** Okay.

**IAN HENDERSON:** Yeah. And I think everybody involved in the process needs to be told by -- from Paula, you know, that sort of level, "This is a pariah -- a priority, and we expect" --

**SUSAN:** No, it's a pariah, you were right the first time.

**RON WARMINGTON:** Freudian slip.

**IAN HENDERSON:** -- you know, "a 48-hour turnaround."

**SUSAN:** Yeah, yeah, yeah.

**ALWEN LYONS:** So I don't --

**SUSAN:** Yeah, go on.

**ALWEN LYONS:** I don't want to suggest -- and I'm saying October not September, because I've -- I don't want to suggest that tomorrow and then us being beaten up at the end of September. So, you know, is it in your email? Can you just -- can you have a think and just check that that is all right to say, October.

**SUSAN:** I think Ian and Ron make it contingent upon -- (unclear: simultaneous speakers) --

**ALWEN LYONS:** That's fine.

**SUSAN:** -- and energetic support from POL.

**ALWEN LYONS:** Yeah, and support and everything. I think that's fine. I just -- I just don't want to --

**IAN HENDERSON:** And of course another risk in the whole process is Fujitsu getting nervous about the whole thing and I am picking up some vibes along those lines.

**SUSAN:** I think you should mention that actually, Ron, in your email.

**RON WARMINGTON:** Okay.

**SUSAN:** Because we have got a difficult few years with them, I think.

**RON WARMINGTON:** Yeah.

**ALWEN LYONS:** So has anybody told -- so this might be -- I'm thinking of that -- the James conversation now. Has anybody told James that -- you know, that half of these cases are basically it's not possible to do anything with because the evidence is lacking?

**IAN HENDERSON:** I have certainly told Janet the -- the sort of the minimum standard that is necessary, and -- and all of the submissions have come from Janet, and therefore, you know, she ought to be aware of the standard of documentation, or the lack

of it.

I don't think we've explicitly said, you know, "Here is a list of, you know, 17 cases, you know, we need a lot more."

**ALWEN LYONS:** Is Paula going to raise that? So who should raise that first with him? Should that be you guys or should that be Paula tomorrow?

**IAN HENDERSON:** I think it's perfectly appropriate to raise tomorrow because, you know, he in his office should be aware of that fact.

**SUSAN:** Also we've been giving people time, you know, blah de blah de blah, haven't we?

**IAN HENDERSON:** There are -- sorry --

**ALWEN LYONS:** Let me just play devil's advocate, okay? Because if I was James tomorrow, I would turn round and say, "Well, why haven't Second Sight told me that?"

**IAN HENDERSON:** Because we have only got what they have submitted from his office and, therefore, you know, that they have as much information as we do about the submission.

**SUSAN:** But you are the expert. I'm just --

**IAN HENDERSON:** No, that's fair enough.

**SUSAN:** You are the expert, right? Janet isn't an expert. She just sends you something across -- all right, you have laid out what you want, but she just sends you something across. And me, being Simon, and going back and saying, "That's not good enough, it can't stand as a case."

**IAN HENDERSON:** Yeah, no, you're right --

**RON WARMINGTON:** Yes, that is correct. We've got to wear that hat. We have been silent to Janet. We've

realised that for a couple of months now that we've been silent on this subject and it's itching us, but the questions as to -- you know, the key issue has been if we go back and ask for more, we are further raising expectations and we've got to do them all then. Okay? So the reason we haven't done that is for that reason.

You know, the moment we should have done that was when we created the JFSA agreement we should have all slammed back to Janet and James a document saying: right, the cases submitted so far do not comply with this, they need to, you've got to go back and get some level of documentation of every case.

I mean --

**IAN HENDERSON:** Ron, we did do that, but without listing the cases. I mean, I wrote to Janet, I think in March --

**SUSAN:** Yeah.

**IAN HENDERSON:** -- saying this is the standard that we require.

**RON WARMINGTON:** Yeah, and I might --

**SUSAN:** (unclear: simultaneous speakers) -- phrased it, Alwyn, they probably had --

**ALWEN LYONS:** Yeah, okay.

**SUSAN:** -- (unclear: simultaneous speakers) -- and it needs to be on these cases.

**RON WARMINGTON:** I might add --

**SUSAN:** -- (unclear: simultaneous speakers) -- listened.

**RON WARMINGTON:** I might add that of all the interviews I've done, I haven't really found many people, hardly any actually, that are capable of documenting

their own case, without external help.

**SUSAN:** Yeah, right. That's a different issue.

**RON WARMINGTON:** Well, that might account for why you haven't got a response.

**SUSAN:** Sorry?

**RON WARMINGTON:** That might account for why we haven't had any responses.

**ALWEN LYONS:** Yeah.

**SUSAN:** It might, but then, you know, they've called on their MPs, they can pick the phone up to you and just say -- or email you and say, "Look, I really want to talk to you about this, I can't explain it."

**RON WARMINGTON:** Yeah. Yeah.

**SUSAN:** Okay.

**RON WARMINGTON:** I mean, the truth was we -- we diverted some attention on to the more fertile, useful spot reviews coming in or matters coming in from the JFSA, and we had our work cut out with the 14 or so cases on which we did have documentation.

**SUSAN:** Yeah, okay.

**ALWEN LYONS:** So I get the MP cases now. So then the JFSA cases --

**RON WARMINGTON:** Yeah.

**ALWEN LYONS:** -- have they -- so we've got the -- so we're talking about the 29 and I understand those. How many cases have you had from -- direct from JFSA? Or have they not sent cases like that? Have they just sent thematic things?

**RON WARMINGTON:** Yeah, there's 19, and what they've sent in are, you know, anything from emails to -- to

scanned documents, isolating in every case one or two transactional issues. Tiny issues. You know, very isolated, closely cropped, relatively easy to understand issues. They are much easier to deal with than the MP-referred cases.

**SUSAN:** I'm just wondering how -- you know, how on earth we shut these down as well, because --

**RON WARMINGTON:** We have shut them down in the sense of no more are coming in because after -- we've got past the end of February.

**SUSAN:** Yes, yes. I meant more how do we get to resolution, really, because we can do all these MP cases --

**RON WARMINGTON:** Yeah.

**SUSAN:** -- some of which are rubbish, and then we'll go to the MPs and we'll say we found this or we found that, and then (unclear) to stand at the sidelines going, "Yes, but you have answered the wrong question. What about all this stuff?"

**RON WARMINGTON:** Yeah, well, exactly. The inference is that -- my position, Alwen, is that trying not, now, to review the JFSA-referred cases will be -- I just can't see how we could get away with that.

**SUSAN:** Okay, well, that then brings us on to discussing the position with the JFSA.

**RON WARMINGTON:** Yeah.

**SUSAN:** So I'll say where I think we are, having garnered that from Ron and Ian, and Alwyn can -- and you can all interrupt.

So Ron and Ian are working closely together with Kay and Alan Bates -- Kay Linnell and Alan Bates. This was an arrangement brokered by James because it was one of the things he started off by saying we need to take JFSA with us. So I reminded Paula, we

all agreed, us at POL, that it was the right thing to do --

**ALWEN LYONS:** Yeah.

**SUSAN:** -- and actually to get them on side would be a remarkable achievement and something we should aim for.

**ALWEN LYONS:** Yeah.

**SUSAN:** We even offered, and it was part of the sort of independent agreement by Kay Linnell, which was also part of -- wound -- so this was all wound up in the James Arbuthnot piece.

Ron and Ian have agreed with JFSA that we would take themes, hence the thematic reviews. A number of themes have come out of cases. Some are duplicated so (unclear) across one or two cases.

We have looked at a -- I don't know, about a quarter of the thematic reviews and delivered them back to you, Ron, Ian?

**RON WARMINGTON:** It would be about -- we've got nearly six spot reviews back, Ian?

**SUSAN:** You have certainly got five back, haven't you?

**RON WARMINGTON:** Yeah, five I think. Yeah.

**SUSAN:** Is it going 20-ish?

**RON WARMINGTON:** We've got 27 spot reviews at the moment.

**SUSAN:** Okay, so a fifth, say --

**RON WARMINGTON:** Yeah.

**SUSAN:** -- (unclear: simultaneous speakers) --

**ALWEN LYONS:** Yeah.

**SUSAN:** Now, I think there is something around the process of the spot reviews where we, POL, have assumed that we would get the allegations, for want of a better word -- statement of facts --

**RON WARMINGTON:** Yeah.

**SUSAN:** -- open quotes, close quotes, from you, the JFSA and the subpostmasters. We would then respond to them.

**RON WARMINGTON:** Yeah.

**SUSAN:** Then I think what we weren't expecting is sort of an iterative process around discussions with Kay Linnell and Alan Bates.

**RON WARMINGTON:** Yeah.

**SUSAN:** And I think we're not entirely sure how we stop this process and it doesn't just go round and round and round, because obviously they're not going to like what we say, they're not going to believe what we say, and we don't know how we could convince them just, short of just telling them face to face, and why would that work when they won't believe it in writing. So my one question is, how do we actually -- having done all the work to answer the questions in the spot reviews, in our honest opinion having answered them properly, because Alwen and I have both reviewed the documentation and -- not been involved in all the investigative work but we have at least reviewed it, as has Angela, to make sure that it's -- and make sure of we know about how we operate, so that sort of sense check there -- can't say it would be absolutely perfect but I think it would get there or thereabouts, particularly with Angela and Alwen's impact, not mine.

**RON WARMINGTON:** Yeah.

**SUSAN:** What do I know? My (unclear) per cent.

My question then is, how do we actually put these

to bed so that we can say those spot reviews are now "agreed" by the JFSA?

**IAN HENDERSON:** Well, unfortunately, it may be that we don't reach agreement with the JFSA. As almost a natural justice point, I think we felt that it was appropriate to have some input from the JFSA before we reach a final sort of conclusion on the whole matter but, I mean, that is a step and a stage that -- that, you know, Ron and I have introduced. We're in control of that and ultimately Second Sight needs to make a decision and come to a conclusion on each spot review, which, you know, we're prepared to do.

**RON WARMINGTON:** Absolutely. Yeah, we're not -- we're not going to be biased in favour of accepting Kay's or Alan's response.

**SUSAN:** Or our response.

**RON WARMINGTON:** Or yours, yeah. I mean, we'll look at -- look at all of it. But in my judgement, and Ian's I think too, it was better to disclose those to them, and obviously once you disclose it to them you're kind of inviting their response. I didn't actually say to them, "Please -- you know, what do you think of this? Please send us your response." But you're bound to get it.

**IAN HENDERSON:** But that was the clear intention, Ron, and I think we would welcome that.

**RON WARMINGTON:** Yeah.

**IAN HENDERSON:** You know, we have not -- you know, any input from them that is, you know, of an informed sort of basis potentially could be helpful, and it's up to us to sort of decide whether to accept or to reject that.

**RON WARMINGTON:** Exactly.

**SUSAN:** Okay, Alwen, does that make you feel -- because

Alwen and I a discussion, as indeed Paula and I had a discussion, about how we get to the conclusion, and we had internally agreed that it was up to Second Sight at some point to get to the conclusion, and you're right, they may never accept it.

Alwen, are you okay with that as an answer?

**ALWEN LYONS:** I suppose that, yes, I am okay with it. I suppose -- I'm just worried that it's always become ever decreasing circles, so, you know, you said this, we said that, you said that. And my expectation, and I think you have just confirmed that that's what's going to happen, my expectation is you're the experts and that -- and in the end you will call it and you'll say the evidence shows or that this is what we think happened and therefore, you know, you need to do something about it, either left-hand side or on the right-hand side.

**RON WARMINGTON:** Yeah, that's --

**ALWEN LYONS:** I wasn't expecting it almost -- it just feels as if -- and I absolutely understand why we need to engage with JFSA and I think that's right, I think we need to do it at a strategic level rather than at a "You said this, we said that, you said this" -- I don't think that will help anybody.

**RON WARMINGTON:** Yep.

**IAN HENDERSON:** Bear in mind, of course, that there are some spot reviews where there is a conflict of evidence, where, you know, POL, possibly via Fujitsu, is saying one thing and where the SPMR is saying something else.

**ALWEN LYONS:** Absolutely.

**IAN HENDERSON:** And it may be that we're unable to resolve that.

**SUSAN:** And it may be that you will have to come back to us and say, "Show us the base data," or, "Ask us

more questions."

**IAN HENDERSON:** Yeah.

**SUSAN:** We completely understand that, don't we, Alwen?

**ALWEN LYONS:** Yes, absolutely.

**SUSAN:** Yeah, I mean, I would expect some -- you know, I would expect that to be the case, because otherwise -- if it was straightforward, we would have sorted it out years ago.

**IAN HENDERSON:** Yeah.

**SUSAN:** Okay. So the next point then is your commentary around what the JFSA's expectation is and who needs to be managing them as stakeholders. So they're expecting us and you to work through the 27 spot reviews. Is that right?

**RON WARMINGTON:** They haven't -- they never said that but I think it's inferred, yeah.

**SUSAN:** I think that -- and what do they expect the outcome to be then, Ron, do you think?

**RON WARMINGTON:** I think very much as Alwen described it, which is that we would get POL's input -- well, we've always said this. We would get POL's input, try to validate or prove/disprove it with the underlying data, bounce it off Kay and Alan, and then reach a conclusion on each case. That's always been the understanding of how we deal with it.

**SUSAN:** Okay.

**RON WARMINGTON:** And I think they would be quite surprised were we to sort of lop off a chunk of spot reviews. I don't think -- I don't have any problem with --

**IAN HENDERSON:** (unclear: simultaneous speakers) -- closed is it?

**RON WARMINGTON:** No, I don't see any problem with an interim report based on some of them. Nothing wrong with that at all.

**IAN HENDERSON:** Except it flies in the face of what Arbuthnot wants or expects.

**SUSAN:** Yes.

**RON WARMINGTON:** It **might do, yeah.**

**SUSAN:** So --

**ALWEN LYONS:** So is there any way, and I'm thinking out aloud here, is there any way of shutting down the MP cases and making James and his friends happy so they'll just go away basically, and then us finding a way forward with JFSA about how we look at the thematic spot reviews and how -- in the future, after you're no longer involved in all this, how we have some sort of Horizon users group, which they might be part of or lead on or whatever. I mean, if we would -- I mean, that's the sort of communication I think we need to have with JFSA, which is around how can we make this better for everyone, including the subpostmasters, and make sure the system works properly.

**RON WARMINGTON:** Yeah.

**ALWEN LYONS:** You know, I think we're just so far away from that at the moment. That should be our goal surely.

**IAN HENDERSON:** I think that's right. I just think it's going to be difficult even to have that discussion until we've reached something closer to finality on the existing spot reviews, because the risk is JFSA will feel we're just brushing the past under the carpet and proposing something that hopefully will be better in the future, and they want closure as far as the past is concerned.

**ALWEN LYONS:** Okay.

**RON WARMINGTON:** But I don't think you'll get any push-back on chopping some of the MP cases from Alan, but we would get push-back on chopping some of his 19 cases or the 26 spot reviews that relate to his cases and the MP ones.

**IAN HENDERSON:** Can I just say one thing on the spot reviews? One thing that we have said from day one, and explained to all the MPs, each spot review is a mini case in itself, and as and when we reach a sort of a conclusion on each spot review, there will be the spot review form, there will be the spot review response from POL, and then there will be our sort of conclusion. We envisage packaging those all together right at the end of the process, and that would form the sort of appendix or a number of appendices to our report. But what it does mean is that over the next few months we will be concluding on a number of spot reviews, we will be sharing those conclusions with JFSA, and whilst we won't be publishing them in the sense of, you know, the world at large, it does represent a form of conclusion on that particular sort of spot review, and I'm just wondering if there's anything we can do with that that, you know, will be of benefit to the process.

**ALWEN LYONS:** So I think there's opportunity and risk there, and I think the risk is around the media, and I suppose it depends what conclusions you come to, and it could go on in either way. If you keep telling them, "There's no problem, there's no problem, we've done this, we've done that, you know, yes, they should do more training, they should do better communications but actually the system is sound," if we say that to them, then -- and you drip-feed that to them, saying there's a big report coming, I think that -- I think there's danger there that they will start disbelieving stuff. If we give them an inkling that there is an issue, I think to make them sit on their hands for three months for a report to arrive, I think that's -- I think that will happen.

**RON WARMINGTON:** Do you mean -- when you say "they", do you mean the JFSA, Alwyn?

**ALWEN LYONS:** Yes.

**RON WARMINGTON:** I'm more confident than I suspect you are because I'm probably closer to them. Alan and Kay I think right now are not in the least bit minded to go to the press, but I accept what you're saying, that were we to lose -- were they to lose trust with us, then I think they will go to the press pretty quickly.

**ALWEN LYONS:** Or if they thought they had a chink of a story, I think that's --

**RON WARMINGTON:** No.

**ALWEN LYONS:** I mean, we're hearing, you know -- we're being quoted that, you know, they've got Private Eye waiting, they've got the BBC --

**RON WARMINGTON:** That's me. I'm saying that. No, it's all quite contained, Alwen.

**ALWEN LYONS:** That's from them, then?

**RON WARMINGTON:** No, they're not -- they're not threatening us with that at all.

**ALWEN LYONS:** Okay, sorry --

**RON WARMINGTON:** I think you -- I want to reassure --

**IAN HENDERSON:** What they did do, of course, was write to the MP, you know, with responsibility for the Post Office --

**RON WARMINGTON:** Yes.

**IAN HENDERSON:** -- and so, you know, that -- (unclear: simultaneous speakers) --

**ALWEN LYONS:** (unclear: simultaneous speakers) --

**RON WARMINGTON:** Yeah, in fact, Alan also told me today he'd written to Paula seeking to meet with her, not least to make sure, he told me today, that there are -- that the messages are getting through to her that should be getting through to her. That's what he said to me just a short while ago.

**ALWEN LYONS:** That's funny because I said I wasn't sure he and Paula should meet. I thought it would be Alwyn and I who should meet him, but anyway.

**RON WARMINGTON:** Yeah, okay. Right.

**SUSAN:** If we go back to the briefing with James for tomorrow, which is Alwen's most immediate problem.

**ALWEN LYONS:** Yeah.

**RON WARMINGTON:** Yes, exactly.

**SUSAN:** Alwyn, have you got enough now and is there a remaining issue round convincing Paula and Alice that we need to keep going with the JFSA reviews?

**ALWEN LYONS:** I think it is. I think -- and I think the issue there will be -- cost will be the issue there, because, in fact, if (unclear) is saying that we can do the MPs and everybody by the end of October, how long is it going to take beyond that to do all the JFSA spot reviews?

**SUSAN:** I thought we'd get everything done by the end of October --

**RON WARMINGTON:** Yeah, I don't think --

**IAN HENDERSON:** When I said three months, I included or had in mind --

**SUSAN:** Oh, right, okay. That's helpful.

**IAN HENDERSON:** I see this all wrapped up by October.

SUSAN: Okay. That's helpful.

RON WARMINGTON: I bloody well hope so, because **GRO**

**GRO**  
**GRO** I've  
already got --

SUSAN: (unclear: simultaneous speakers) -- **GRO**

**GRO**

RON WARMINGTON: Right, that sounds like good  
-- (unclear: simultaneous speakers) --

IAN HENDERSON: (unclear: simultaneous speakers) -- **GRO**

**GRO**

SUSAN: **GRO**

**GRO**

RON WARMINGTON: **GRO**

SUSAN: **GRO**

**GRO**

IAN HENDERSON: **GRO**

RON WARMINGTON: **GRO**

**GRO**

SUSAN: **GRO**

RON WARMINGTON: **GRO**

SUSAN: Alwyn, (unclear).

RON WARMINGTON: It doesn't do any harm.

IAN HENDERSON: Can I just mention one practical point in  
case you get any push-back on JFSA issues?

SUSAN: Yeah.

IAN HENDERSON: The totality of the JFSA agreement is

published on the internet, you know, and is available to the world and its dog, and I don't think, in any practical sense, there's any scope to renege on any of that.

**SUSAN:** Okay.

**ALWEN LYONS:** Well, I did bring this up with Paula today, and she said, "Oh, yes, I assumed we'd keep on doing those."

**RON WARMINGTON:** Yeah.

**MR ENRIGHT:** Okay.

**ALWEN LYONS:** Whether that's true or not, but that's what she said to me when I spoke to her at lunch --

**SUSAN:** So that's helpful. It's helpful.

**RON WARMINGTON:** Well, what we're getting to then is the culling of some of those low value, undocumented, disinterested MP cases. You're not getting push-back from us, that's for sure, and I don't think you're going to get push-back from JFSA, and actually neither from Arbuthnot. The only people that might --

**IAN HENDERSON:** No, Ron, can I just pick up on Arbuthnot? I mean, I raised that with Arbuthnot.

**RON WARMINGTON:** Yeah?

**IAN HENDERSON:** And he specifically said, "I don't think I've got the power, you know, to involve individual cases" --

**SUSAN:** Well, the other option --

**RON WARMINGTON:** No --

**SUSAN:** The other option, Ian, if we could offer -- so -- because it's the -- it's not only those but it's the new cases that are coming in. The other

option is we could say that we will offer those MPs the POL reviews. And frankly, given how much attention they've paid so far, the MPs that is, that may be enough.

**IAN HENDERSON:** Well, can I just read something out, because I've been looking at my emails with Janet whilst we've been talking. I had an email from Janet on 21st March, which is obviously four days before the MP meeting, and the relevant sentence is:

"Dear Ron and Ian, I am sending these two [as in cases] in some trepidation from discussions with ..."

**RON WARMINGTON:** Exactly.

**IAN HENDERSON:** "... earlier this week. I gather that there has been a deadline for new cases to be accepted."

In other words, **she's implying or accepting that the drawbridge had come down probably on 28th February and that we would be getting no more MP cases from that date --**

**SUSAN:** That's what we agreed, I think.

**IAN HENDERSON:** Yes.

**RON WARMINGTON:** I just found the same email, Ian.

**SUSAN:** (Unclear) JFSA?

**RON WARMINGTON:** Yes, this was -- would have been Shaheen(?) and Robinson come in, and yeah, you're right, the conversations we had with her, I remember, she called me, she said, "Oh, look, I'm really embarrassed, I think these have been sitting on my desk."

**IAN HENDERSON:** Ron, can I just finish reading this out? Second sentence from Janet:

"I'm afraid I didn't know about the deadline until it was mentioned this week, so it might be worth mentioning to MPs obviously, i.e. no new cases to be taken on from now, but I would be very grateful if you'd consider taking these two on."

**RON WARMINGTON:** Exactly.

**IAN HENDERSON:** So I think that, you know, we had in effect reached agreement that after the date of this email that we would definitely be getting no new cases via the MP route.

**SUSAN:** I think there are two things we can say: firstly that, "And there's the evidence"; secondly, if there are cases where you have not been able to find evidence and not -- the subpostmaster has not been forthcoming, that we, POL, again subject to senior management review and intervention, will contact those subpostmasters and invite them to come forward.

I mean, we could offer that, Alwen. I don't know whether she will offer it tomorrow with James.

**ALWEN LYONS:** Yeah.

**SUSAN:** Or she could say, of course, it's always up to the subpostmasters to come directly to -- and I think we should give them a separate email address or something, not -- that they don't go through the normal route in the network. Even maybe come to you as the company secretary or something.

**ALWEN LYONS:** Yeah, yeah, could do that. I have my own email address now.

**SUSAN:** Well, I was thinking that it was possible that for subpostmaster complaints and queries, in order to stop getting -- to get them out of the network loop, we should --

**ALWEN LYONS:** Yeah.

**SUSAN:** -- you should actually do sort of -- I know we didn't provide another appeal to it, but they can come to you and at least get a hopefully more, maybe -- maybe -- more fair hearing.

**ALWEN LYONS:** Yeah.

**SUSAN:** Or at least a hearing.

**ALWEN LYONS:** Yes, yeah. Okay, I have that.

**SUSAN:** (unclear: simultaneous speakers) -- a little way --

**ALWEN LYONS:** Yeah.

**SUSAN:** -- from that, but it's part -- and it's part of what I need to put in place as part of the "let's change the investigation" structure.

**ALWEN LYONS:** Yes, absolutely. Okay.

**SUSAN:** So I think the one issue we have then is whether Paula is prepared to wear us taking until the end of October, worst case, to get to all the other -- the JFSA.

**ALWEN LYONS:** I think she's going to want to run that past Alex.

**SUSAN:** That's fine. I thought she remembered -- you know, but I think she needs a timeline, Alwen, which we can probably get from Simon.

**ALWEN LYONS:** Yes. Yeah, okay.

**SUSAN:** Otherwise, it will just -- I mean, I know it's long and it's taking too long and everything else, but this stuff --

**ALWEN LYONS:** I think if we can promise them something, an interim report, by before the end of July -- we can call it a report, wouldn't that be --

SUSAN: Yes, yes.

ALWEN LYONS: -- then I think they'll be happier.

SUSAN: Okay.

ALWEN LYONS: Then if we can say, you know, and -- and then within three months or by the end of -- let's say end of October, let's not push it -- or are we saying end of September? If you are all going off doing something --

IAN HENDERSON: I think, to be safe, it ought to be October.

SUSAN: Okay, okay.

ALWEN LYONS: (unclear) GRO

RON WARMINGTON: GRO  
GRO

ALWEN LYONS: GRO

RON WARMINGTON: GRO Right --

SUSAN: When Ron sends his email in, he has to make that subject to adequate --

ALWEN LYONS: Yes, if you could -- if you could get a form of words for me and -- so that I can include that in the report with Paula, so she's got that as (unclear) tomorrow.

RON WARMINGTON: Yeah, yeah.

SUSAN: That would be really helpful.

RON WARMINGTON: Okay. Okay, right, we'll do that.

The other thing that's -- I don't know, Ian, before this meeting we were discussing this bloody Bracknell issue. Are we right in thinking that Paula isn't aware of that?

**SUSAN:** Yes, she's not aware of it -- or, no, she's not aware of it.

**RON WARMINGTON:** I don't think Arbuthnot is aware of it either -- or maybe he is. Oh, actually he is, because it's --

**IAN HENDERSON:** He's aware that it's something we're looking at.

**RON WARMINGTON:** He is aware of it.

**IAN HENDERSON:** He's aware of some of the, you know, evidence that is -- that is coming up.

**RON WARMINGTON:** Yes, he's not aware of how it's panned out over the last -- more recently.

**SUSAN:** Yes, I suppose my view on that is I would really like to understand -- and I have been out of the loop so apologies, and it probably should be me -- Ian, you and I probably need to sit down and go through the evidence and work out what the next steps are with it, or Alwen and ...

**RON WARMINGTON:** Yeah.

**SUSAN:** He's obviously got an enormous download of data from CSP. I saw that.

**IAN HENDERSON:** Yeah.

**SUSAN:** Maybe we don't need to take Alwen's time on this but you have been through the emails.

**IAN HENDERSON:** Yes.

**SUSAN:** You've found this one email. We don't need to say, "Right, well, what does that mean?" I need probably to get Lesley involved as well, or I need to ask Lesley for consistent help.

**RON WARMINGTON:** It's more than one email but --

**SUSAN:** Yeah, okay. But there is evidence, let's put it that way.

**RON WARMINGTON:** There **is something**.

**IAN HENDERSON:** Simon also -- and before I say this, we also need to decide whether we're sticking with the discussion of a few weeks ago, which was to keep Simon completely clear of this, because Simon mentioned it in a call to Ron and I earlier today and he has, in the last couple of days, got some new information that pretty well confirms at least part of what we have found.

**MR ENRIGHT:** Right, okay. I think we are going to have to put some -- somebody else on this. I don't know. We haven't found somebody yet, have we, Alwen?

**ALWEN LYONS:** No, but I think we'll have to.

**SUSAN:** Shall I text Lesley and ask her to give me a call --

**RON WARMINGTON:** You can't really delegate this to Fujitsu because --

**ALWEN LYONS:** No, no, no, we wouldn't do that.

**RON WARMINGTON:** Okay. Now, who's mentioned it, Simon told me shortly before this call that he'd questioned Rod Ismay and Andy Winn as to whether they knew about that process, and he said that they said they didn't know anything about it.

**SUSAN:** Right.

**RON WARMINGTON:** So one of them might be a civil person.

**IAN HENDERSON:** Ron, we need somebody unconnected with the process.

**SUSAN:** To be honest, **I think we need somebody out of the line.**

RON WARMINGTON: Mmm.

IAN HENDERSON: Who is -- who -- you know, who's got a brain and has got some good IT knowledge.

RON WARMINGTON: Got an internal auditor there?

SUSAN: I almost wonder if it's our new head of internal -- there's an IT auditor who has just started.

ALWEN LYONS: Yeah, that might work.

SUSAN: I haven't dragged him into it yet. I could do.

RON WARMINGTON: The sort of thing an IT auditor would routinely do.

SUSAN: It is.

RON WARMINGTON: Yeah.

SUSAN: It might be quicker to get him. It would be good for him because it would get him up to speed quicker as well with stuff.

RON WARMINGTON: Yeah.

SUSAN: But I'd have to get Chris to agree to it.

Are you happy, because of where we are on the Bracknell piece, that we don't -- it's not -- we have suspicions. We need to work them through.

IAN HENDERSON: I think it's dangerous not to brief Paula.

RON WARMINGTON: Yes, so do I. I would brief her on it.

SUSAN: But what do we say, though?

RON WARMINGTON: How's it going to be, for example, if -- if, for all I know, Arbuthnot asks her a question

about it tomorrow? She's going to be blind-sided on it.

**SUSAN:** Well, what does he know? He only knows the allegations that Rudkin's made, doesn't he?

**RON WARMINGTON:** Yes.

**IAN HENDERSON:** Yeah, but what we're getting, Susan, you know, not putting too fine a point on it, is confirmation that the sort of facility that was described was at the sort of capability that was described does exist. You know, the issue, the outstanding issue, is what are the consequences of that and have we got a reliable record --

**ALWEN LYONS:** The last audit.

**IAN HENDERSON:** Yes.

**ALWEN LYONS:** Yes, but it's very different saying to Paula that we found this way that you can fiddle with the system, right, or them saying to her there is (unclear) process because he would have to use it for this, this and this. However, here are the records of the robust audit. That's a very different message.

**SUSAN:** And she has -- Simon has been through with her the recent incidences.

**ALWEN LYONS:** Yes.

**SUSAN:** So she has all that.

**RON WARMINGTON:** Yes.

**ALWEN LYONS:** Yes.

**RON WARMINGTON:** Yes. Yeah. Well. That's good.

**ALWEN LYONS:** Yes, she's got everything. The way that I've tried to brief Paula is as soon as I have evidence that, you know, there is a problem she

knows about it the next minute and so does Alex.  
So, you know -- so we have talked through the bugs  
and we have done and so we've done that.

**RON WARMINGTON:** But the context of this --

**IAN HENDERSON:** Bracknell is in the same category.

**RON WARMINGTON:** Yeah, the context of this is --

**SUSAN:** The thing is, Ron, we don't have the end  
solution.

**RON WARMINGTON:** Well, no but -- well, that's true of  
lots of things, isn't it? In my mind, that doesn't  
mean -- if I was in her shoes and I was not told  
about it because you didn't have the end solution,  
I wouldn't be very happy about it.

**IAN HENDERSON:** I mean, why don't we just say it does  
look as if there was the sort of capability  
available that has been sort of described. What we  
don't yet know is the consequences or the impact of  
that and that is something that we are urgently  
working on.

**ALWEN LYONS:** Do we know that the capability's there? We  
need to -- I'd like to --

**RON WARMINGTON:** Simon has told me that it is true the  
facility does exist, but --

**ALWEN LYONS:** So where's he getting that from because  
I haven't seen that anywhere?

**RON WARMINGTON:** He said he found out.

**IAN HENDERSON:** He found out --

**RON WARMINGTON:** Yeah, he's found out a lot in the last  
half day or so.

**SUSAN:** Okay, so we need --

**RON WARMINGTON:** He is the centre of knowledge on that at the moment.

**SUSAN:** Okay. Okay. Well, we'll catch up with Simon on that.

**RON WARMINGTON:** Yeah. I think, I mean, having said that, he relayed something that Gareth is saying it more or less doesn't exist or it's misunderstood but, you know, that's -- I don't know. I don't know the answer to that yet.

**SUSAN:** You see, I don't think we know the answer. I suppose it's a -- there are allegations made about the facility, a Post Office(?) testing facility at the Fujitsu. Maybe, you know, it is the case that that exists.

**IAN HENDERSON:** Well, remember it was POL employees. They just happened to be located in a Fujitsu building. I don't think we can sort of pass the blame on to Fujitsu.

**ALWEN LYONS:** No, no, I'm not saying that but I don't -- they're testers, aren't they? That's who they are. It's a test environment.

**RON WARMINGTON:** Well --

**IAN HENDERSON:** What we're seeing from the emails is they were getting instructions, in effect, directly from the Helpdesk saying, "Look, we need this fixed. You know, can you work your magic?" and, you know, the responses are going back, "Yeah, it will be done in the overnight run tonight. We will change the balances or whatever".

**SUSAN:** Okay. Well -- we need to talk to Simon.

**RON WARMINGTON:** Yeah.

**ALWEN LYONS:** Have you got the email? Are you the only one with the email?

**IAN HENDERSON:** And, Susan, I'm coming back to the question a few moments ago. I haven't sent that to Simon and I suggest that we don't because I really think they --

**SUSAN:** No, you're right. You're right. We can't really go to Simon --

**ALWEN LYONS:** No, no, okay. But then he's obviously been doing stuff.

**IAN HENDERSON:** I think he's doing it as much to protect his back. I mean, you know --

**ALWEN LYONS:** Well, I don't think -- I think he was just trying to be helpful --

**RON WARMINGTON:** Yeah. I think he was, Ian. I think he was genuinely trying to be helpful on it.

**ALWEN LYONS:** I don't think he was trying -- you know, I think I know him well enough that that's something --

**RON WARMINGTON:** He really is curious as to what on earth was the truth in this and he's actively trying to get to the bottom of it. So I'm -- but I agree. I don't disagree with your position there. But it does require some urgent action because it's just such a big issue that could be nothing, that's just -- it's just a big X factor.

**ALWEN LYONS:** And whether we can get to it and how we can get to it and who we can get to help us with it.

**RON WARMINGTON:** I'm pretty sure you won't be able to resolve it before tomorrow.

**ALWEN LYONS:** No, no, no. No, I'm not saying resolve it --

**RON WARMINGTON:** Get to the bottom of it --

**ALWEN LYONS:** -- what Paula needs to know before she

talks to James, that's all.

**RON WARMINGTON:** Yeah.

**ALWEN LYONS:** I'm not sure whether it's going to --  
I think it will just confuse things.

**RON WARMINGTON:** If James says something like "and where are you on this assertion about the Bracknell covert operations team" as it was referred to by Rudkin and, remember, he's got a direct line to Shoosmiths. They're chummy apparently. So they will have told him about this, for sure. So, you know, if he challenges her on it --

**ALWEN LYONS:** -- (unclear) say, well, look that's a specific case --

**RON WARMINGTON:** (Unclear).

**ALWEN LYONS:** -- when we've finished the investigation.

**RON WARMINGTON:** Yeah, as long as she doesn't come back and say, "Well, he mentioned this Bracknell issue. What is he talking about?" "Oh, we've known about that for, you know, two months."

**ALWEN LYONS:** No, she knows about the allegation.

**RON WARMINGTON:** Oh okay.

**ALWEN LYONS:** We're working on it.

**RON WARMINGTON:** That's all right then. Okay. Good, good, good.

**ALWEN LYONS:** So we mentioned it to her.

**RON WARMINGTON:** Okay.

**SUSAN:** It's been going (unclear) very odd.

**IAN HENDERSON:** But I think she needs to be prepared for the, you know, the journalist-type question, you

know.

**SUSAN:** "When did you last beat your wife?"

**IAN HENDERSON:** Yes, and in relation to, sort of Bracknell, can you assure me that there is not some, you know, back door, some remote capability, you know, at Bracknell or elsewhere, you know, that has been used to the detriment of SPMRs.

**SUSAN:** She won't. I mean --

**ALWEN LYONS:** I don't think James will ask her -- you know, if he did, I think she could quite rightly say, "My understanding is that that's one of the things in the spot reviews that we're looking at; so, you know, we'll get to it when we've looked at the evidence claims". I think, you know, that's where I would push her in that.

**IAN HENDERSON:** Okay.

**ALWEN LYONS:** I don't think she's going to start talking about cases, to be honest.

**RON WARMINGTON:** Okay.

**SUSAN:** She's just desperate to try and get some structure round it.

**ALWEN LYONS:** Yeah, yeah.

**SUSAN:** Alwyn, is there anything else you need from us because I'm conscious --

**ALWEN LYONS:** No, I don't think so. I'm going to try and put this together now and then get that over to you, Susan.

**SUSAN:** Okay. That's fine.

**IAN HENDERSON:** What time is the call?

**ALWEN LYONS:** 10.30.

IAN HENDERSON: Fine, okay. Well, if anything else springs to mind, I mean, you know, contact either Ron or I direct.

RON WARMINGTON: And we'll contribute our pieces of that stuff to you tonight, Alwyn.

ALWEN LYONS: Excellent, okay.

SUSAN: Okay. Thanks you for your help. Thank you very much.

ALWEN LYONS: Bye.

RON WARMINGTON: Bye.

IAN HENDERSON: Bye.

(The call concluded)

FEMALE SPEAKER: There weren't lithium batteries in.

RON WARMINGTON: Okay.

FEMALE SPEAKER: Or Adrian's or the chemist or --

RON WARMINGTON: No, it's only Tesco's that do them, I think. Not to worry, can we --

FEMALE SPEAKER: Have you met Becky's partner --

RON WARMINGTON: You met Becky?

FEMALE SPEAKER: -- from Winston, yes. I was coming out --

RON WARMINGTON: Oh, that Becky.

FEMALE SPEAKER: Yeah, yeah. I was coming that chemist --

RON WARMINGTON: That Becky, yeah, yeah, right.

**FEMALE SPEAKER:** And he said, "Oh, you don't want another one of those dogs, do you?" I said no but -- are you Winston's -- are you Becky's partner?

**RON WARMINGTON:** Yes.

**FEMALE SPEAKER:** I said I've got one at home.

**RON WARMINGTON:** We know. We met him.

**FEMALE SPEAKER:** Oh, that's Harry.

**RON WARMINGTON:** Yeah, funny.

**FEMALE SPEAKER:** Then I went into the crop shop, "Oh, we saw one of these the other day, a lot younger than him, white. We've looked for a tan". I said, "Yes, I think that's Winston".

**RON WARMINGTON:** That's Winston. How funny. Yeah. Yeah. No, we're on the trail of Winston, eh?  
(*Descriptive noise*) Laying in the sun there, look. Okay, I've got to do some more work on the Post Office now.

**FEMALE SPEAKER:** All right. Shovel some dirt?

**RON WARMINGTON:** Mmm?

**FEMALE SPEAKER:** (unclear) dirt shovelling.

**RON WARMINGTON:** Dirt shovelling, yeah. Ian will call in a minute. The whole bloody -- I spent the whole bloody -- I had one more spot review but spelt the whole day on the bloody phone dealing with the management of the case. They want to get some structure around it.

**FEMALE SPEAKER:** Bit late for that, isn't it?

**RON WARMINGTON:** As if it's unstructured.

**FEMALE SPEAKER:** What, who wants to control the Post Office?

RON WARMINGTON: Yeah, they want to rein the costs in.  
I mean, it's costing so much. Right, okay.

**(Recording ends)**