

Tuesday, 21 May 2024

1
2 (9.45 am)
3 **MR BLAKE:** Good morning, sir, can you see and hear me?
4 **SIR WYN WILLIAMS:** Yes, thank you very much.
5 **MR BLAKE:** This morning, we're going to hear from Ms Lyons.
6 **ALWEN LYONS (affirmed)**
7 **Questioned by MR BLAKE**
8 **MR BLAKE:** Thank you very much. Can you give your full
9 name, please?
10 **A.** It's Alwen Lyons.
11 **Q.** Ms Lyons, you should have in front of you a witness
12 statement, or at least in a bundle in front of you.
13 **A.** I do, yes.
14 **Q.** Can you see that? Thank you. Is that dated 24 April
15 2024?
16 **A.** Yes.
17 **Q.** Could I please ask you to turn to the final page, that's
18 page 90.
19 **A.** Yes.
20 **Q.** Can you confirm that that is your signature?
21 **A.** It is.
22 **Q.** Is that statement true to the best of your knowledge and
23 belief?
24 **A.** So I'd like to make some clarifications to that
25 statement, if that's okay.

1

1 12 January 2012 and the statement suggests that two
2 reports were to be circulated. Having revisited the
3 action log, it states "a report" rather than "two
4 reports", were circulated to the board.
5 And, lastly, my statement at paragraph 345 on
6 page 104 refers to my contact with ex-colleagues after
7 my retirement, including, for example, with Paula
8 Vennells. I had forgotten, until reminded recently,
9 that Paula had contacted me in March and in June 2020,
10 via text message and follow-up email in June 2020, to
11 ask if I could help with details for her information to
12 the Select Committee. I believe she called me on two
13 occasions, March 2020 and June 2020, but I do not recall
14 that I was able to provide you with any information.
15 I've also been reminded that I met Paula for dinner
16 early in 2020 and I cannot specifically recall what we
17 spoke about. Since retiring, I've had a small number of
18 other communications with Paula.
19 And that is my clarification, thank you.
20 **Q.** Thank you. Subject to those clarifications, is that
21 statement true to the best of your knowledge and belief?
22 **A.** It is.
23 **Q.** Thank you very much. I believe there's something else
24 you would like to say as well.
25 **A.** Yes, before I give evidence I would like to convey my

3

1 **Q.** Yes, please.
2 **A.** So I would like to make the following clarification and
3 comments in relation to my statement and, as before,
4 I give this evidence to the best of my knowledge and
5 belief.
6 Firstly, in my statement, I refer to a meeting with
7 Alice Perkins and Lord Arbuthnot as having taken place
8 on 12 March 2012, this being the date indicated to me by
9 the Inquiry. However, on further review of the
10 material, I can see that this meeting took place on
11 13 March 2012.
12 Secondly, it was my belief that Susan Crichton had
13 been General Counsel for the -- from the point of
14 separation from Royal Mail Group. However, since
15 submitting my statement, I've been made aware that Susan
16 Crichton was actually Legal and Compliance Director from
17 separation and became General Counsel in July 2013.
18 Thirdly, paragraph 64 and 96 of my statement refer
19 to the Royal Mail Group Internal Audit with a reference
20 number. It has come to my attention that the reference
21 number referred to at these paragraphs and within the
22 index is incorrect. The correct reference number is
23 POL00029474.
24 Fourthly, paragraph 62 on page 15 of my statement
25 refers to the action log from a Board meeting on

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1 sincere sorrow that this scandal has happened and, in
2 particular, my deep regret for those wrongfully
3 convicted or accused. These words cannot even begin to
4 put right what has happened but they are sincere.
5 I cannot imagine how it must have been for
6 subpostmasters whose voices were not -- went unheard
7 throughout these years and I want to express my deep and
8 genuine remorse for what has happened.
9 **Q.** Thank you very much, Ms Lyons. The statement you have
10 spoken about is WITN00580100, and that will be uploaded
11 onto the Inquiry's website.
12 I want to begin today just by looking at your
13 background. I think you were employed by the Royal Mail
14 Group and the Post Office for some 33 years; is that
15 correct?
16 **A.** Yes, that's right.
17 **Q.** I think, in fact, your parents ran a sub post office --
18 **A.** They did.
19 **Q.** -- and I think your father was the NFSP General
20 Secretary at one stage?
21 **A.** He was.
22 **Q.** You joined the Royal Mail Group in 1984 --
23 **A.** Yes.
24 **Q.** -- and you started as a graduate trainee?
25 **A.** Yes.

4

1 Q. You held various roles over the length of your career?
 2 A. Yes.
 3 Q. Those included, amongst others, as an Area Manager and
 4 then Retail Network Manager between 1991 and 1995.
 5 A. Yes.
 6 Q. I think you've said in your statement that you were
 7 responsible for 180 sub post offices in that role --
 8 A. I was.
 9 Q. -- and you were involved in what you've referred to as
 10 to "disciplining" subpostmasters. Can you assist us
 11 very briefly with what that may have involved?
 12 A. So only in as much as if there was an audit at
 13 an office, I would have been involved in making the
 14 decision as to the future for the subpostmaster or to
 15 interview them or just talk to them about what had
 16 happened, et cetera.
 17 Q. You were then Head of the Retail Network for South
 18 London between 2000 and 2001?
 19 A. I was.
 20 Q. There you headed a team of 18 Retail Line Managers.
 21 I think you also heard appeals in relation to the
 22 discipline of --
 23 A. I think -- I seem to remember a couple in that time.
 24 Q. Yes, and that was, of course, during the rollout of
 25 Horizon 2000 and 2001?

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1 subpostmasters?
 2 A. So, yes, my team, when I was running South London, they
 3 were the Retail Network Managers looking after
 4 subpostmasters.
 5 Q. Did you have any personal experience of using the
 6 Horizon system?
 7 A. Only very -- so every Christmas we would go and help in
 8 our post offices, so you'd go -- you'd have somebody
 9 training and then you'd go for the day and use the
 10 Horizon system but I didn't have any experience of
 11 balancing the Horizon system.
 12 Q. When did you first become aware of the Post Office or
 13 Royal Mail Group's prosecutorial function?
 14 A. I can't really say when I became aware. I think it was
 15 later when we were talking about Sparrow -- I didn't
 16 think I realised at the time that we prosecuted.
 17 Q. So even when you were involved in the discipline of
 18 subpostmasters or the appeals from subpostmasters, you
 19 weren't aware that the company was also prosecuting
 20 subpostmasters?
 21 A. So, no, I wouldn't have been involved with any of the
 22 prosecutions.
 23 Q. But were you aware of that function?
 24 A. I don't remember being aware.
 25 Q. You held various other roles after the Head of Direct

7

1 A. Yes.
 2 Q. Do you recall that period?
 3 A. To the best of my memory, yes, that was when it was
 4 rolling out.
 5 Q. You were then Regional General Manager between 2001 and
 6 2002 --
 7 A. Yes.
 8 Q. -- responsible for running post offices in the South
 9 East region --
 10 A. Yes.
 11 Q. -- and Head of Direct Manager Branches between 2002 and
 12 2005 --
 13 A. Yes.
 14 Q. -- with four regional managers reporting to you?
 15 A. Yes.
 16 Q. During those various roles and perhaps some others,
 17 presumably you had a fair bit of direct contact with
 18 subpostmasters?
 19 A. So not when I was -- not when I was General Manager for
 20 Directly Managed because those are the Crown Offices, so
 21 at that point I would have no contact with
 22 subpostmasters.
 23 Q. But in the other roles I've described, so in the '90s --
 24 A. In south London --
 25 Q. -- early 2000s, did you have a fair bit of contact with

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1 Manager Branches and in 2011 you became Company
 2 Secretary; is that right?
 3 A. That's right, yes.
 4 Q. I think you held that role until 2017?
 5 A. Yes.
 6 Q. Can you assist us with why you were approached in
 7 respect of that particular role?
 8 A. So I -- up until that point, I'd been doing separation
 9 from Royal Mail Group for about 18 months and we were
 10 putting together a new Board with an independent chair,
 11 and I had the relevant qualification to be a company
 12 secretary, and I had a CIMA qualification and I knew --
 13 because of how long I'd worked in the business and my
 14 experience in the business, I was approached by Paula
 15 Vennells and Debbie Moore to ask if I would like to be
 16 Company Secretary.
 17 Q. What was your relationship with Paula Vennells at that
 18 stage?
 19 A. Well, at that stage, she was the CEO, she was running
 20 the company. I think I had a good relationship with her
 21 but not a necessarily close one.
 22 Q. Do you know why you were specifically chosen for that
 23 role?
 24 A. I think Paula, and probably more Debbie, thought I had
 25 the experience to carry out that role.

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1 Q. Did you ever been a company secretary before that role?
 2 A. No.
 3 Q. How about the Chair, what was your relationship like
 4 with the Chair at that stage?
 5 A. So I think it was good. It was very professional.
 6 I tried to help with Alice's induction into the business
 7 and point her in the right directions when she wanted to
 8 go and learn more information about different parts of
 9 the business.
 10 Q. You took on the role in 2011. When were you first aware
 11 of subpostmasters experiencing issues with Horizon?
 12 A. So I believe it was at a board meeting and the issue was
 13 raised, I think it was early 2012, was raised by Les
 14 Owen, who was a Non-Executive Director.
 15 Q. We've heard, for example, of a 2009 Computer Weekly
 16 article. Was that something you were aware of?
 17 A. Not that I remember.
 18 Q. In all of the various roles you held within the Post
 19 Office over the years before becoming Company Secretary,
 20 had you not heard of complaints from subpostmasters
 21 experiencing problems with the Horizon system?
 22 A. Not that I can remember.
 23 Q. I want to ask you about the role of company secretary.
 24 Do you consider that when you took on that role you were
 25 fully aware of what the role of a company secretary

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1 Accountant, and to get any further in the Finance
 2 Department, you had to be qualified. So I decided this
 3 is what I wanted to do and spent four years getting the
 4 qualification.
 5 Q. Was that a qualification that was specific to a company
 6 secretary role or a broader finance role?
 7 A. No a broader finance role. It's a finance -- it's
 8 an accountancy role.
 9 Q. You've set out in your statement at paragraph 29 various
 10 roles that were involved with the position of company
 11 secretary. I want to take you to the expert report that
 12 we have from Dame Sandra Dawson and Dr Steward
 13 outlining -- it goes into quite a bit of detail about
 14 the different roles within a company.
 15 A. Okay.
 16 Q. Could we please turn to EXPG0000006, please. This the
 17 first of their reports. Could we please turn to
 18 page 23. I'm just going to take you to a few sections
 19 of the report to see if it accords with your
 20 understanding of your role. If we look 2.2.9, it says:
 21 "The Chair, with the support of Company Secretary,
 22 is responsible for ensuring that all committees have
 23 sufficient support to conduct their business
 24 effectively, eg with timely and appropriate papers and
 25 minutes."

11

1 involved.
 2 A. No, and before I accepted the role I did some research
 3 as to what it would be that I would be taking on.
 4 I went to see the Royal Mail Group Company Secretary,
 5 had a couple of meetings with him, I also did some
 6 research online about what the role was, what the
 7 responsibilities were, so that I made an informed
 8 decision about whether I thought I should take that role
 9 on.
 10 Q. Were you provided with any training for the role?
 11 A. So I had some training and some ongoing training after
 12 taking the role. I did some, I think, three or four
 13 online courses before I started and then, whilst I was
 14 doing the role, there was some catch-up, whenever
 15 anything changed with the Companies Act or, you know, we
 16 needed updating, some -- I think it was legal firms that
 17 offered company secretaries to come in and have a day
 18 with them, and I did, I think, three or four of those.
 19 Q. I think you've said you were accredited by the Chartered
 20 Institute of Management Accountants in 1993?
 21 A. Yes.
 22 Q. What made you take on that qualification in 1993?
 23 A. So in 1993 -- or just before that because it took me
 24 four years to qualify -- I was working in the Finance
 25 Department of the business, I was the Management

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1 Do you agree with that description of the role?
 2 A. Yes.
 3 Q. Do you think you fulfilled that role?
 4 A. I believe so.
 5 Q. If we turn over the page to 24, 2.2.17, please -- it's
 6 the bottom of page 24, thank you. It says:
 7 "Chairs are accountable for running the Board, ie
 8 for ensuring that the Board ..."
 9 Then it goes through various different
 10 accountabilities of the chair:
 11 If we look at (f), it says:
 12 "With the Company Secretary, ensuring that movement
 13 on and off the Board is accompanied by appropriate
 14 induction (training and familiarisation with duties of
 15 Board [members] and company strategy, operations and
 16 risks) and exit (confidentiality, equipment, access
 17 controls) procedures."
 18 Do you agree that was one of your roles?
 19 A. Yes.
 20 Q. Do you think you fulfilled that role?
 21 A. I believe so.
 22 Q. Could we turn to page 29, 2.2.33. There's a detailed
 23 section on the role of a company secretary. It says:
 24 "A Company Secretary is an officer who is appointed
 25 by the company's directors to advise the board on all

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1 governance matters and codes."
 2 Do you agree with that?
 3 A. Yes.
 4 Q. Do you think you fulfilled that?
 5 A. I do.
 6 Q. "They will normally seek to ensure compliance with the
 7 company's legal obligations. Their accountability is to
 8 the Board and the Chair to ensure that all appropriate
 9 governance measures are brought to the Board's
 10 attention. As regards the functioning of the Board,
 11 they are technically independent of the CEO, and
 12 accountable to the Chair. However, as an Executive
 13 colleague (and in a sense subordinate to the CEO) they
 14 need a very good working relationship with the CEO, who
 15 is likely to be very influential in their relationship."
 16 Do you agree with that summary?
 17 A. I do, yes.
 18 Q. Again, do you think you fulfilled that role?
 19 A. I do.
 20 Q. One more, also on the same page. There are various
 21 accountabilities that are set out there at 2.2.34:
 22 "A Company Secretary's accountabilities normally
 23 include:
 24 "Maintaining the company's statutory books,
 25 including registers of directors and shareholders;

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1 A. So at times, it was wider and -- but always coming back
 2 to the Board. So I was -- if I did other things, it was
 3 mindful that I was doing them on behalf of and for the
 4 Board -- and the Chair, sorry, and the Chair.
 5 Q. I mean, that's quite an important distinction. Do you
 6 think that you were pursuing those objectives for the
 7 Board or for the Chair?
 8 A. I think both.
 9 Q. Do you think that the Board had sufficient oversight of
 10 that work?
 11 A. I think they did. I think they did at the time.
 12 Q. Can we please, while we're on this report, turn to
 13 page 102. There's one more reference there to a company
 14 secretary. It's at the bottom of the page. This is
 15 a table that sets out various changes over time. That
 16 there refers to the Walker Review of the banking crisis,
 17 which:
 18 "... proposed changes to the Combined Code to
 19 strengthen the principles of stewardship and greater
 20 challenge in financial services, which were taken on by
 21 other sectors. Proposals for all large listed companies
 22 included:
 23 "Embedding a 'culture of challenge' into Boardroom
 24 behaviour."
 25 Then over the page, we see there at (b):

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1 "Working with Chair to ensure that all Board members
 2 are aware of their duties and powers;
 3 "Providing secretarial services to the Board and all
 4 its committees, including arranging meetings, minuting
 5 meetings;
 6 "Working with the Chair on the Board agenda; and
 7 "Arranging participation of non-Board members for
 8 specific items in Board discussions (including handling
 9 sight of relevant minutes, timing of Board appearances,
 10 follow up)."
 11 Do you agree with those duties?
 12 A. Yes.
 13 Q. Do you think you fulfilled those?
 14 A. I think I did, yes.
 15 Q. I think at one stage in your statement you refer to part
 16 of your role as being a conduit?
 17 A. Yes.
 18 Q. But it does see as though it is more of a substantive
 19 role than simply a conduit to the Board; do you agree
 20 with that?
 21 A. Oh, yes, definitely.
 22 Q. Was your role -- and we'll come on to look at a number
 23 of documents over the years -- was it wider than is
 24 described here, taking forward, for example, certain
 25 strategic matters for the CEO and chair?

14

1 "Providing adequate support for [Non-Executive
 2 Directors] typically from the [company secretary]."
 3 Did you see that as part of your role?
 4 A. I think providing adequate support for the non-execs,
 5 definitely.
 6 Q. Do you think you fulfilled that role?
 7 A. I believe so.
 8 Q. One of the roles involves minuting Board minutes.
 9 A. Yes.
 10 Q. Can you assist us with what experience or what training
 11 you had in respect of that skill?
 12 A. So I believe that one of the training courses I did
 13 before I took up the role was in minute taking. So it
 14 was an online course and it was in minute taking.
 15 Q. Can you assist us with who the provider was --
 16 A. I'm sorry, it's too long ago. I can't.
 17 Q. The Post Office was wholly owned by the Government?
 18 A. Yes.
 19 Q. To what extent did you consider the corporate governance
 20 rules of a commercial company to apply to the Post
 21 Office?
 22 A. So, clearly, the Post Office did not have to comply to
 23 all of those rules but I saw those rules as best
 24 practice and so I would have looked at those rules and
 25 thought "Which of these are relevant for us?", and

16

1 I would have discussed -- if it was necessary, would
 2 discuss that with the Chair.
 3 **Q.** What, if any, difference did you see in the governance
 4 of a publicly listed compared to a publicly owned
 5 company?
 6 **A.** I think we had a difference -- a different type of
 7 governance because we had governance through to the
 8 Government and, therefore, we had, for instance,
 9 a non-exec that was a Shareholder Executive
 10 representative. So in some ways there was additional
 11 governance in terms of how we were responding.
 12 **Q.** What role did you see the Government or the Civil
 13 Service playing in the governance of the company?
 14 **A.** So they were our shareholder. So, in my eyes, a very
 15 important role and having that Shareholder Executive NED
 16 on the Board was very important.
 17 **Q.** What, if any, conflicts of interest did you see between
 18 the ownership of the Post Office by the Government?
 19 **A.** So the only conflicts of interest in Board meetings that
 20 I remember -- and all Board members gave a declaration
 21 at the beginning that they would speak up if there was
 22 a conflict of interest -- the only conflict of interest
 23 I remember was that the Shareholder Executive wasn't in
 24 the room when we were discussing funding and areas that
 25 we were going to negotiate with the Government. I don't

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1 **A.** No, she wasn't.
 2 **Q.** Was that something that you considered?
 3 **A.** So I think it was something that Alice considered but it
 4 was her decision that she wouldn't -- that General
 5 Counsel would not be a member of the Board or even
 6 attend Board meetings.
 7 **Q.** What was your view on that?
 8 **A.** I don't think I had a view either way. If the Chair
 9 wanted and the Board wanted the General Counsel in the
 10 room, that would be fine. When I was -- so I worked to
 11 the General Counsel, so the General Counsel was my boss,
 12 until Chris Aujard came along and, because he was
 13 an interim, I then worked to Paula for about nine months
 14 and then when Jane MacLeod came along I worked again for
 15 the General Counsel. So I am not sure that it would
 16 have changed the Board at all to have the General
 17 Counsel there.
 18 **Q.** Because you were on the Board?
 19 **A.** Well, I wasn't on the Board; I was attending the Board
 20 meetings, yes.
 21 **Q.** Is that why you don't believe it would make
 22 a difference: because you attended?
 23 **A.** Yes.
 24 **Q.** How about the contract and personnel management? Where
 25 do you consider the oversight and accountability for the

19

1 see any others.
 2 **Q.** We spoke about the prosecutorial function --
 3 **A.** Yes.
 4 **Q.** -- of the company?
 5 **A.** Yes.
 6 **Q.** Where did you consider oversight and accountability for
 7 the investigation and prosecution function to lie within
 8 the company?
 9 **A.** So I certainly didn't it lying with company secretary
 10 because I had no input to any prosecutions. I would
 11 have thought it would have lie -- laid with the Legal
 12 Team.
 13 **Q.** Do you recall any specific mechanisms for reporting and
 14 feedback, in that respect, to the Board?
 15 **A.** So there was -- so the Board heard -- had litigation
 16 reports sent to them at -- not at every Board meeting,
 17 I think quarterly or they would come to the Board. And
 18 I think that's the way that the significant litigation
 19 was passed to the Board.
 20 **Q.** Who would you expect to have fed back to the Board in
 21 that respect?
 22 **A.** So I would have expected that to be the General Counsel.
 23 **Q.** We've seen -- and I don't know if you saw Ms Crichton's
 24 evidence -- but General Counsel wasn't, in fact,
 25 a member of the Board?

18

1 contractual and personnel management of subpostmasters
 2 to have laid within the company?
 3 **A.** From my memory, I believe it sat in Network. So there
 4 was a Network Director and I believe that that
 5 responsibility would have sat with them.
 6 **Q.** Again, do you recall any specific mechanisms for
 7 reporting in that respect?
 8 **A.** No, not that I can recall.
 9 **Q.** Who would you have expected to feed back to the Board?
 10 **A.** From the Network?
 11 **Q.** Yes.
 12 **A.** I would have expected the Network Director to have come
 13 to the Board.
 14 **Q.** To have attended the Board?
 15 **A.** No, to -- so the way that the Board meeting worked was
 16 you had your Members of the Board and myself in the
 17 Board meetings, and then when executive members were
 18 coming along to give a presentation or share a paper or
 19 whatever, they would come to that specific part of the
 20 Board meeting.
 21 **Q.** Where did you consider oversight and accountability of
 22 issues relating to the Horizon system to have laid?
 23 **A.** So if we're talking about Horizon, as in the computer
 24 system, I would have -- I believed that lay with the CIO
 25 because I believe they had the relationship with

20

1 Fujitsu.

2 **Q.** Do you recall any specific mechanism for reporting and
3 feedback in that respect?

4 **A.** So I think the CIO did come to the Board on a few
5 occasions, not only talking about Horizon, talking about
6 the wider IT.

7 **SIR WYN WILLIAMS:** Sorry, I may not have quite caught the
8 acronym. Did you say "CIO" or "CEO"?

9 **A.** CIO, sorry, sir.

10 **SIR WYN WILLIAMS:** That's what I thought.

11 **MR BLAKE:** So Chief Information Officer.

12 **A.** Yes, Chief Information Officer.

13 **Q.** That was Lesley Sewell at the time?

14 **A.** Yes.

15 **Q.** How would you judge whether something needed to be
16 brought to the Board's attention?

17 **A.** So I would check with the Chair. If something came to
18 my attention that I believed that either the Chair or
19 the Board would -- should know, I would check with the
20 Chair and she would -- or he when it was Tim -- they
21 would generally say, yes, this needs to be sent to the
22 Board. It was something that could come to a Board
23 meeting, then I would generally check the agenda with
24 the Chair -- not generally, I always checked the agenda
25 with the Chair because it was the Chair's agenda, and

21

1 a significant role during that period --

2 **A.** No.

3 **Q.** -- that period of great change?

4 **A.** No, I believed I could represent the business well.
5 I knew the business well. I knew Royal Mail well
6 because I had been managing the Royal Mail contract for
7 the few years before that. So I didn't have any
8 concerns, no. It was a tough few months because --
9 well, it was a very serious issue that was happening.

10 **Q.** What committees or formal groups were you a member of in
11 respect of the decision making for separation?

12 **A.** So there was one formal meeting, where I think -- where
13 it was the Government, myself and Royal Mail, and
14 I think Royal Mail were represented by McKinseys, as
15 their consultant, and I would go to that meeting.
16 I think it was weekly and, as we got nearer to
17 separation, it became more regular.

18 We would have morning conference calls, which lasted
19 about an hour, and then, in terms of me taking that
20 information back into the Post Office, I would --
21 I cannot specifically remember who sat on which
22 committees but the Post Office had a Separation Working
23 Group where I would bring the information back from the
24 large committee and say, "These are the areas we're
25 discussing and this is where Royal Mail wants to go, and

23

1 I might have had input from executive members saying,
2 "I need to bring this paper to the Board", or whatever,
3 and I would -- the Chair and I would sit down and look
4 at the agenda and say -- agree the timings and agree the
5 agenda.

6 **Q.** Would you be, effectively, a conduit to the Chair for
7 that purpose?

8 **A.** Yes, yes. So -- I mean, some areas came seasonally
9 because you'd have a budget and some came quarterly,
10 some came when the exec wanted to raise or discuss
11 something with the Board, and I would amalgamate all
12 these into an agenda, go and see the Chair and say,
13 "This is what needs to come to this board meeting, are
14 you happy with all those things coming?", and we'd agree
15 timings.

16 **Q.** I now want to move on to the separation of Royal Mail
17 and the Post Office.

18 **A.** Okay.

19 **Q.** You've said that you were involved before you became
20 Company Secretary --

21 **A.** Yes.

22 **Q.** -- in that role. Separation itself occurred shortly
23 after you became Company Secretary.

24 **A.** Yes.

25 **Q.** Did you have any concerns about being appointed to such

22

1 this is what I've told them where we are but I need more
2 information from the experts in the business", if you
3 like, because we talked about every single aspect of the
4 business and how it would be affected by this
5 separation.

6 **Q.** You've said that you discussed every aspect of the
7 business.

8 **A.** It felt like it.

9 **Q.** To what extent was there discussion about the Horizon
10 system?

11 **A.** So I honestly do not remember there being specific
12 discussion about the Horizon system. I do remember
13 there being discussion about IT and I went -- because we
14 were talking about splitting the IT systems, and I'm not
15 sure that happened on the date of separation because
16 I think -- I seem to remember that Lesley came to the
17 Board to talk about separation later. So not everything
18 separated on 1 April 2012, because it would have been
19 impossible to do that, and the separation actually
20 carried on probably for another two to three years.

21 **Q.** What discussion, if any, was there about the
22 prosecutorial function from what you can remember?

23 **A.** I don't remember any discussion about that.

24 **Q.** So there were discussions about lots of things but not
25 the two matters that are quite important to this

24

1 Inquiry?

2 A. Well, not that I can remember.

3 Q. Were you involved in developing the governance

4 structures at the Post Office that would follow the

5 separation?

6 A. Only in terms of the Board.

7 Q. What do you recall of significant changes that you --

8 A. So coming -- so Post Office always had a Board but it

9 wasn't an independent Board and, after -- and the reason

10 that the Board was put in place before separation was

11 that, otherwise, Post Office was also -- was almost

12 negotiating with its boss because Royal Mail was its

13 boss.

14 So they wanted to split the Board and give us

15 an independent Board before separation so that Board

16 could then have the governance, and I was involved with

17 that governance in terms of helping Alice set up the

18 Board, finding Non-Executive Directors and all the

19 things that have to happen before you set up a Board.

20 Q. Were you involved in the development of policies and

21 procedures in respect of governance or was it more

22 structural?

23 A. More structural.

24 Q. Could we please turn to POL00179491 and this is a chain

25 of emails that relate to the investigations and

25

1 "[Royal Mail Group] Security wish to take the

2 prosecution lead for offences committed against [Royal

3 Mail Group] products, including Post Office employees

4 and/or agents. Post Office Security position is that

5 the lead/parent organisation of the employee/agent

6 apprehended should take the lead for prosecution (in

7 line with their HR and Prosecution Policy and will be

8 the organisation most likely to have the evidential

9 material in which to support a prosecution)."

10 If we go over to page 3, please, the bottom of that

11 page, John Scott forwards the email to a number of

12 people and you're one of the named people there. Do you

13 recall this discussion?

14 A. I don't recall this discussion, no.

15 Q. Why would you have been copied into a discussion

16 relating to the Investigations MOU; was that --

17 A. I think purely because of my separation role. So on

18 here you've got a lot of people who were part of that

19 separation team, if you like, from Royal Mail as well as

20 Post Office.

21 Q. If we look from the bottom of page 1 over to page 2,

22 please, there's a response from Tony Marsh, who is the

23 Group Security Director at the Royal Mail Group; do you

24 remember Mr Marsh?

25 A. I do, yes.

27

1 prosecution function within the Post Office and the

2 drafting of a Memorandum of Understanding. Could we

3 start on page 4, please. It's the second half of page 4

4 and on to page 5. There's an email here from John

5 Scott, who is the Post Office Head of Security to Mike

6 Young. Do you recall who Mike Young was?

7 A. So Mike Young was, I think, the Chief Information

8 Officer at the time.

9 Q. Thank you. He says:

10 "Mike [this is 6 March 2012].

11 "We believe we're close to an agreement.

12 "There have been a number of debating points, but

13 are now down to the last two:

14 "Number 1

15 "[Royal Mail Group] Security focus primarily on

16 investigations and prosecution with a view for

17 compensation via the courts and then supported by crime

18 prevention post-apprehension. They seek to allow

19 further theft/crime to continue in order to be able to

20 identify and apprehend the offender for such

21 prosecution. Post Office Security will support this

22 approach in most circumstances, but cannot agree on

23 every occasion which has been discussed."

24 Then, if we go down the page over to the next page,

25 you have the second debating point, number 2.

26

1 Q. You're still copied in here.

2 A. Yeah.

3 Q. He says:

4 "Colleagues

5 "The conference call will take place. The main

6 issue has been unflagged changes made by [the Post

7 Office] in returned documents", et cetera.

8 If we scroll down, I am just going to read that

9 paragraph that begins "It is inaccurate". He says:

10 "It is inaccurate and disingenuous for John to state

11 [it quotes, I think, the bit that I've just read] 'RMG

12 Security focus primarily on investigations and

13 prosecution with a view to compensation via the courts

14 and then supported by crime prevention post

15 apprehension. They seek to allow further theft/crime to

16 continue in order to be able to identify and apprehend

17 the offender for such prosecution', as he does in his

18 associated email of 6 March to Mike Young. If this was

19 the basis of John's briefings to Mike Young then some of

20 Mr Young's mornings explicable briefs and positions may

21 now be better understood. [Royal Mail] Security

22 naturally pursues a strategy of prevention, deterrence,

23 disruption and detection, with prosecution and asset

24 recovery a key element of the deterrence approach.

25 [Royal Mail] Security would never seek to prolong

28

1 offending behaviour, as this would exacerbate losses to
2 the organisation and its customers, impact negatively on
3 customer satisfaction and public perception and might
4 result in an offender facing increased penalties, which
5 would in itself be an affront to natural justice. Any
6 suggestion to the contrary is unprofessional and does
7 John little credit."

8 Do you recall tensions between the Investigations
9 and Security branches of the Royal Mail and the Post
10 Office?

11 A. So I didn't at the time. Having read this now, it's
12 very clear that there were tensions between the two of
13 them and, yeah, it's very clear.

14 Q. If we scroll up to page 1, please, in the middle email,
15 there is an email from you to Susan Crichton. You say:
16 "Mike would have stamped on this very quickly."

17 A. So my response there was that, if Mike thought that he
18 was not being presented with all the information by
19 John, he would have very quickly gone and sorted that
20 out, basically.

21 Q. So are you there saying that Mr Marsh is wrong or --

22 A. No, no, no. I'm saying -- so, from what we've just
23 heard, my understanding is that Tony Marsh is saying
24 that John Scott has misrepresented something to Mike
25 Young and my point here is that -- and Mike's on that

29

1 Post Office as a prosecutor?

2 A. No.

3 Q. Were you aware of, for example, the ongoing duties of
4 disclosure?

5 A. No.

6 Q. Did you give the Board or enable the Board to have
7 a briefing on their duties as a prosecuting body?

8 A. So I believe there was, I think it's later, though.
9 There was discussion at the Board around prosecution but
10 not at the start of them becoming a Board, no.

11 Q. So there was discussion, I think, once the Horizon
12 issues --

13 A. Yes, yes.

14 Q. -- are raised in the Board but, in terms of them taking
15 over an entirely new function, are you aware of any
16 briefing about their duties?

17 A. Not that I'm aware of.

18 Q. Who did you consider was responsible to ensure that the
19 Board had systems in place so that they were aware of
20 their legal and regulatory responsibilities?

21 A. So it would have been -- in terms of governance, it
22 would have been myself, along with the Chair.

23 Q. Do you see any issue there?

24 A. I think it would have been helpful -- knowing what
25 I know now, it would have been helpful if the Board had

31

1 email chain -- Mike would have very quickly stamped on
2 that and gone back to John and said, "I'm being given
3 the wrong information here".

4 Q. Did you know John Scott at this time?

5 A. Yes, I knew him.

6 Q. Did you have a view on his abilities?

7 A. I didn't know him well enough to have a view on his
8 abilities, really. I just knew him as a colleague in
9 the business.

10 Q. If we scroll up we see a response from Susan Crichton,
11 and she says:

"Oh no it's all Lesley needs at the moment."

Can you assist us with that at all?

14 A. No, and is that -- so --

15 Q. Lesley Sewell is copied in to --

16 A. Are we assuming Lesley is John Scott's boss? I don't
17 know the hierarchy so I don't know what Susan's
18 referring to here.

19 Q. You have no recollection of this particular chain?

20 A. No.

21 Q. Thank you. That can come down.

22 In terms of taking over the prosecution and
23 investigation functions from the Royal Mail Group, did
24 you have any training, were you given any training, on
25 the particular legal and regulatory obligations on the

30

1 had a briefing on the prosecutions.

2 Q. Do you reflect on that as a personal failing?

3 A. It wouldn't have been for me to provide that but
4 I should -- I could have gone and asked for whoever was
5 now taking over the prosecutions to come to the Board
6 and explain prosecutions to the Board.

7 Q. It wouldn't have been for you to provide the training or
8 the briefing itself?

9 A. No, no.

10 Q. But as somebody who was responsible for the governance
11 function within the Board, do you take some
12 responsibility for not having that briefing?

13 A. Yes, I have to.

14 **SIR WYN WILLIAMS:** Earlier to Mr Blake, when he was asking
15 you about when you first realised that either Royal Mail
16 or Post Office exercised a prosecution function, you
17 gave me the impression -- and I'm not saying that in any
18 critical sense -- that you were not actually aware that
19 that function was being exercised by either until a date
20 after separation. Now, on the face of it, that may be
21 quite surprising, given that something as important as
22 prosecuting is passing from Royal Mail to Post Office.

23 So could we just revisit your best recollection of
24 when you were aware that, first, Royal Mail, if at all,
25 secondly, Post Office, were actually exercising

32

1 a prosecution function?

2 **A.** So, sir, I'm not sure in that email -- and we'd have to

3 bring it back up, if it suggests that we are prosecuting

4 and, if it does, then that's something I missed or --

5 **SIR WYN WILLIAMS:** Well, I'm not too concerned --

6 **A.** Okay.

7 **SIR WYN WILLIAMS:** I don't think it does, subject to

8 Mr Blake correcting me, but I'm more interested in the

9 fact that there's going to be a transition from Royal

10 Mail prosecuting people to Post Office prosecuting

11 people and, from what you've told me, so far at least,

12 there was simply no discussion, amongst any of the

13 senior people, of which you were aware, that this was

14 going to happen; now, is that right?

15 **A.** No, I'm saying I wasn't aware. There was discussion

16 between senior people, clearly, because we've just --

17 and Mike Young, who was the Chief Information Officer,

18 he would have owned this and there must also have been

19 a handover in the Legal Team with lawyers coming over

20 from Royal Mail to Post Office. My comment earlier was

21 that -- and I still would, I think, stick to that,

22 I wasn't aware of the detail of the -- of us

23 prosecuting. I -- so the assumption I made until later,

24 when I found out about it, was that it was -- that we

25 were using external -- the police or whoever to do those

33

1 of matter wouldn't reach Board level?

2 **A.** Well, a lot of things that happened through separation

3 and the agreements between Royal Mail and Post Office

4 didn't -- I don't believe went to Board level because

5 there would have just been too many of them. However,

6 this is, you know, an important issue that the Board,

7 I believe, should have been aware of and I'm not sure

8 they were.

9 **Q.** I now want to ask you about your lines of reporting --

10 **A.** Yes.

11 **Q.** -- because you've given some evidence about that, that

12 you reported to two General Counsels: first, Susan

13 Crichton --

14 **A.** Yes.

15 **Q.** -- second, Jane MacLeod. There was this period in

16 between the two where Mr Aujard was Interim General

17 Counsel. Am I right in saying you didn't report to

18 Mr Aujard; during that period you reported directly to

19 the CEO?

20 **A.** That's right.

21 **Q.** Were you the most senior officer to be reporting to the

22 General Counsel?

23 **A.** I mean, the General Counsel also had a Head of Legal and

24 other people in their teams, so I wouldn't have

25 considered myself any more senior than some of those

35

1 prosecutions.

2 **MR BLAKE:** When you referred to "senior people", I mean,

3 we're concerned really today, principally, with the

4 Board.

5 **A.** Yes.

6 **Q.** Do you think if the Board had known about it you would

7 have known about it?

8 **A.** I think so.

9 **Q.** So we've seen emails with Mike Young in, John Scott in,

10 about Investigations Memorandum of Understanding --

11 **A.** Yes, yes.

12 **Q.** -- as an example. If that had reached Board level and

13 there had been discussion about the prosecution function

14 at Board level, you would have known about it?

15 **A.** It would have been in the minutes, yes.

16 **Q.** Well, I suppose Board level doesn't necessarily mean

17 formal board discussions.

18 **A.** Oh, okay. So I still believe I would have known about

19 it because the general practice was that anything going

20 out to the Board was sent via me, so that we could keep

21 an understanding of what's being sent to the Board

22 because, otherwise, it wouldn't be -- it would not be

23 good governance if anybody could send anything to the

24 Board.

25 **Q.** Do you find it surprising or unsurprising that that kind

34

1 people but I was the only officer of the Board reporting

2 to the General Counsel.

3 **Q.** Can we please have a look at WITN10010102. This is

4 an organogram that has been produced as an exhibit by

5 Jane MacLeod. We can see there at the top, POL Board

6 and your position is on the top right-hand side,

7 "Company Secretary"?

8 **A.** Yes.

9 **Q.** We then see below that, the structure that falls

10 underneath the Chief Executive and then the General

11 Counsel. If we have a look to the left-hand side, it

12 says there company secretary, prior to 2016, reporting

13 directly to the Chief Executive; is that wrong?

14 **A.** That's wrong. So there was a period in 2016 which was

15 when Chris Aujard was General Counsel, and it's only for

16 that period that I reported to the Chief Exec.

17 **Q.** Then we see on the right-hand side of that Company

18 Secretariat and Company Secretary and the line going

19 there to General Counsel; is that more of how you saw --

20 other than that temporary position --

21 **A.** Yes.

22 **Q.** -- that's where you saw your reporting line?

23 **A.** Yes.

24 **Q.** Is it in any way odd that you were a member of the Board

25 but reporting to somebody who was not a member of the

36

1 Board and who is considerably below the Board?

2 **A.** So I didn't consider it odd. It didn't change the way

3 I behaved or -- on a day-to-day basis. It didn't --

4 although I was a member of the General Counsel's team,

5 I considered myself also a member of the Chair's team

6 and a member of the Board's team. So, no, I don't think

7 it changed the way I behaved, that I was a member of the

8 General Counsel's team.

9 **Q.** Who would induct the General Counsel? We've seen a bit

10 of movement during this period.

11 **A.** Yes. So that would have been the outgoing General

12 Counsel. I believe that Susan would have done the

13 induction for Chris Aujard, and Chris Aujard would have

14 done the induction for Jane MacLeod.

15 **Q.** Did you oversee that at all?

16 **A.** No.

17 **Q.** There's quite a lot of movement at quite an important

18 time --

19 **A.** Yes.

20 **Q.** -- for the Inquiry. I mean, just to give you a very

21 brief timeline, we have the separation in April 2012.

22 **A.** Yes.

23 **Q.** We have the Second Sight Interim Report in July 2013.

24 We have various important advice, Mr Clarke's Advice on

25 Gareth Jenkins in July 2013 --

37

1 my role.

2 **Q.** But you don't recall being responsible in any way for

3 that passing of information?

4 **A.** No, not at all.

5 **Q.** Thank you. That can come down.

6 I want to move on now to your early work on what

7 I'll call Horizon issues.

8 **A.** Okay.

9 **Q.** We see some emails. The first one I'll look at is March

10 2012. That's POL00096052. It's an email chain of

11 13 March 2012. It's an email from Alice Perkins to

12 Paula Vennells, Susan Crichton, you and Lesley Sewell.

13 The subject is "James Arbuthnot" and it says:

14 "Alwen will do a note of the meeting for you and

15 attach on a personal basis, a document which [James

16 Arbuthnot] gave me. I won't duplicate that but would

17 like to talk to you about this once you've had a chance

18 to read them and what follows.

19 "I think [James Arbuthnot] genuinely wants to seek

20 a resolution to the difficulties concerned and is

21 willing to believe that we will do the right things.

22 There is a real prize for us in finding an effective way

23 of convincing him and his fellow MPs that things are as

24 they should be. He believes that this will quieten down

25 Private Eye and would prevent proposed escalation,

39

1 **A.** Yes.

2 **Q.** -- Mr Clarke's Advice on the retention of materials, the

3 "shredding" advice in August 2013?

4 **A.** Yeah.

5 **Q.** We have Susan Crichton leaving towards the latter half

6 of 2013 --

7 **A.** Yeah.

8 **Q.** -- Mr Aujard taking his position in October 2013.

9 Throughout the later period so 2014, you have issues

10 with the Mediation Scheme and then you have Jane MacLeod

11 taking over in January 2015.

12 **A.** Mm-hm.

13 **Q.** How were those 2013 issues, from Susan Crichton's time,

14 passed to somebody like Jane MacLeod? How would the

15 company ensure that that institutional knowledge from

16 2013 moved to the person who took on the role in 2015?

17 **A.** So my understanding is that that the -- so the briefing

18 from Susan to Chris Aujard, I believe Susan did that,

19 and she would also have had at the time a Head of Legal,

20 who would presumably have -- not that I have any

21 knowledge -- but would have briefed Chris Aujard on the

22 legal issues that are -- that are going on with the

23 company. I don't specifically remember -- or I don't

24 believe that I was involved in that briefing, although

25 I must have briefed him about the Board because that was

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1 eg adjournment debate etc. To do this, we might

2 commission a new independent review of the Horizon

3 related questions (my thought) or invite him accompanied

4 by someone from Computer Weekly to visit the Model

5 Office and be shown how Horizon works (his suggestion)

6 or something else altogether.

7 "I promised to go back to him once I had the chance

8 to consider all this. I would like to do so by Easter

9 or at least have fixed a further meeting by then.

10 "I am asking Glenda to set up a further meeting to

11 discuss this amongst ourselves in the next couple of

12 weeks."

13 So there's a small group here who are discussing

14 James Arbuthnot and what looks like what ultimately

15 becomes Second Sight's investigation.

16 **A.** Yes.

17 **Q.** Why were you part of this group?

18 **A.** Well, so Alice is -- I went with Alice to visit James

19 Arbuthnot and this is the note she's asking for about

20 that meeting. I believe Alice wanted me to be involved

21 when she couldn't be around, almost as her ears on

22 anything that was discovered.

23 **Q.** Do you think that that is part of the role of company

24 secretary or is that something else?

25 **A.** I think it is part of the role of company secretary to

40

1 flag up issues to the chair, if they arise and you have
 2 to be part of the conversation to enable you to flag
 3 those issues up.
 4 Q. Were you there simply to listen or to provide
 5 a substantive contribution?
 6 A. So I think I was -- when Alice was in the room, I was
 7 there to listen and take a note and support her and,
 8 therefore, the Board. When she wasn't in the room,
 9 I would contribute but I always did so thinking that I'm
 10 here representing Alice and the Board.
 11 Q. Could we turn, please, to POL00107712. We're now on
 12 11 April. If we could start on page 3, please. There's
 13 an email from yourself to Rod Ismay, and you say:
 14 "Rod, can we have the file on this office as well.
 15 I will ask Glenda to organise an urgent meeting with the
 16 four of us to go through both files to see if there are
 17 similarities. If Oliver and James are coming it would
 18 be great to be able to look at the keystrokes which
 19 caused this and explain why they happened."
 20 So this is relating to Oliver Letwin, so we've now
 21 got James Arbuthnot and Oliver Letwin --
 22 A. Yes.
 23 Q. -- and you're asking Rod Ismay to provide you with
 24 a file; is that right?
 25 A. Yes.

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1 A. What I meant by this was that we're going to talk about
 2 two cases. What I would have liked to see was the
 3 accounts for those two cases, which show the -- all the
 4 transactions, the keystrokes, that have gone into those
 5 accounts so that we can somehow find out where
 6 a discrepancy has happened, where a mistake has
 7 happened. So that's what I mean by "keystrokes".
 8 Q. Keystrokes implies some sort of recording of every
 9 single move that a subpostmaster makes?
 10 A. Yes, yes.
 11 Q. What was your understanding of the information that was
 12 available to either subpostmasters or to the Post
 13 Office, in that respect?
 14 A. So my understanding, at this point, and -- was that
 15 a subpostmaster could see everything in their account
 16 and they would be able to look at their account and look
 17 at all the transactions and understand what had
 18 happened.
 19 Q. Did you understand that they could look at the
 20 transactions or the keystrokes because those are two
 21 different things, aren't they?
 22 A. Okay, so, in my head, I was -- so I don't differentiate
 23 between those two things. That's maybe because I'm not
 24 as IT literate, or whatever, but what I thought I was
 25 saying here was I would like to look at the keystrokes

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1 Q. Do you recall this?
 2 A. Don't recall it but, from reading it now, yes, I --
 3 Q. I think it's the case of Ms Merritt --
 4 A. That's what I was doing --
 5 Q. -- that was being raised by Oliver Letwin?
 6 A. Yes, yes.
 7 Q. A few questions in relation to this. I mean, first of
 8 all, were you then taking a slightly more proactive
 9 role?
 10 A. So I believe I was trying to get all the people that
 11 were inputting to the notes for Alice and Paula for this
 12 meeting to provide information, so that a note could be
 13 written. That's my belief of what's going on here.
 14 Q. Reference here to looking at the keystrokes which caused
 15 the issue.
 16 A. Yes.
 17 Q. You had, by this stage, worked at the Post Office and
 18 Royal Mail for a very considerable period of time.
 19 A. Yes.
 20 Q. You had worked with subpostmasters?
 21 A. Yes.
 22 Q. You had, as you say, used Horizon but never balanced on
 23 Horizon?
 24 A. Yes.
 25 Q. What did you mean by "keystrokes"?

42

1 for each transaction. So --
 2 Q. So every step that led up to the transaction --
 3 A. Every step, yes, yes.
 4 Q. Did Mr Ismay or anybody come back to you and say that's
 5 possible or not possible?
 6 A. Not that I can remember. I think we got a -- I think we
 7 got the files through that we needed to put together the
 8 brief for the two MPs.
 9 Q. Did you, at this stage, know what ARQ data was?
 10 A. No.
 11 Q. Do you recall looking at what you understood to be the
 12 keystroke data at that time or the transaction data?
 13 A. So I didn't look at this in any detail. The people who
 14 were providing this would provide this for the report
 15 for the MPs. I didn't have the knowledge to be able to
 16 challenge any of these reports.
 17 Q. Could we turn to POL00057656, please. This is a note
 18 from 3 May 2012 discussion on James Arbuthnot and Oliver
 19 Letwin meeting. This is your note, I think your name is
 20 at the bottom of it.
 21 A. Yeah.
 22 Q. Do you recognise it?
 23 A. I don't recognise it but it clearly is my note.
 24 Q. It has there "Present: Alice, Paula, Susan and Alwen",
 25 so a very small group: Chair, Chief Executive, General

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1 Counsel and you?

2 **A.** Yes.

3 **Q.** "On 17 May, we have [James Arbuthnot] and [Oliver
4 Letwin] arriving at 10.30 with [Oliver Letwin] leaving
5 at 11.30 and [James Arbuthnot] leaving at 12.00:
6 "The best outcome of this meeting would be
7 a position where they believe our evidence in their
8 individual constituent's cases and support how we are
9 handling the current situation.
10 "Longer term, once they are assured by the review of
11 Horizon they could 'help' to win others round."
12 If we scroll down on the same page, one of the
13 bullet points says as follows, it says:
14 "Explain the old and new Horizon systems and that
15 any live system review would have to be on the new
16 system, although we have an audit trail of every
17 keystroke in the old system kept for 7 years."
18 There's again there the reference to "keystrokes".
19 **A.** Yes, yes.
20 **Q.** Was that a term that the other attendees at this meeting
21 would have used or is this your wording?
22 **A.** So this is my note of the conversations in the meeting,
23 so I don't know whose words those are in the meeting.
24 So I don't know what the others in the meeting knew and
25 I don't know who mentioned "keystrokes", if it was me or

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1 "Brampton SPSO Barnsley.
2 "Contract termination due to an aged debt of
3 £20,000 -- former [subpostmaster] claims ATM/Horizon was
4 at fault for the loss in as much as a transferred to ATM
5 figure doubled up (matter dealt with by conduct and not
6 prosecution) ...
7 Whilst in summary the former [subpostmaster] was not
8 operating the ATM reconciliation correctly, she is
9 alleging that the Horizon system and ATM machine
10 generated the loss and that she has been the innocent
11 victim in this matter."
12 If we scroll up, please, we have Mr Flemington
13 sending you and Ms Crichton that email and saying:
14 "So a possible ATM issue rather than Horizon this
15 time ..."
16 Your response was:
17 "This isn't the only ATM one though so we need to be
18 careful we don't make that the next computer system they
19 want a forensic review of!"
20 Can you assist us with why you were being copied in
21 and why this correspondence was taking place with
22 Mr Flemington?
23 **A.** So I don't know why I was copied in by Hugh. So I don't
24 know.
25 **Q.** We've seen your involvement with James Arbuthnot --

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1 someone else. I don't have a recollection.

2 **Q.** Do you recall anyone ever challenging that term or
3 anyone explaining the level of information that was or
4 was not available to the Post Office?
5 **A.** No.
6 **Q.** Were you aware of costs involved in obtaining what we
7 know as ARQ or audit data?
8 **A.** No, at this -- I didn't know what ARQ data -- or what it
9 was called or whatever.
10 **Q.** Thank you. Could we please turn to POL00180773. We're
11 still in 2012. If we scroll down, there's an email from
12 Hugh Flemington. So if we -- yeah, that's fine. Thank
13 you. So it's Mr Pardoe to Hugh Flemington, Susan
14 Crichton is copied in. It's then forwarded to you by
15 Hugh Flemington slightly above but we can stick with
16 this email to start with. Did you know Mr Pardoe?
17 **A.** Yes.
18 **Q.** So he says it's related to "Wincor ATM Log Fault", and
19 he says:
20 "As per our conversation I have been advised that
21 a contract termination issue has been passed, by former
22 [subpostmaster], to Shoosmiths in regards to alleged
23 Horizon issues and an erroneous entry in an ATM log (not
24 a Horizon log)."
25 It gives the details:

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1 **A.** Yes.
2 **Q.** -- with Oliver Letwin.
3 **A.** Yes.
4 **Q.** By this stage, were you taking more of an active role in
5 those discussions regarding potential litigation, for
6 example, we see here the mention of Shoosmiths, which is
7 a law firm?
8 **A.** Yes, I don't believe I had any involvement in the
9 Shoosmiths issues but this -- it may well be that Hugh
10 thought, because of the James Arbuthnot and the MP
11 meetings, that it was -- you know, it mentions Horizon,
12 so I needed to be included.
13 **Q.** Your comment there that "[We have got] to be careful we
14 don't make that the next computer system they want
15 forensic review of", was that reflective of a general
16 view in the company; was that something that was simply
17 your own view?
18 **A.** So I think that -- I think -- I must have known at the
19 time, and I don't recall now, but I must have known at
20 the time that there were ATM -- there were issues with
21 the ATM reconciliations and how those numbers got put
22 into Horizon. But it was a completely separate system,
23 so I don't know why I made that comment. You know. No,
24 I don't know.
25 **Q.** Could we please turn to POL00180830. We're now just

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over a week later, 28 June, on page 2, please. Hugh Flemington sends Paula Vennells an email.

"Hi Paula

"I just wanted to flag this court case to you.

"We have civil (not criminal) case in court tomorrow where we have already had an admission from the subpostmaster that she owed us the money. Tomorrow sees us try to put a charge on her property so *if* she ever sells it we (hopefully) get paid back out of the scales proceeds."

Then it gives a brief history, and it says:

"She started out as a [subpostmistress] in 2008 and seems to have had balancing issues from the start. She closed temporarily in 2010 due to ill health and finally for good in 2011. We never terminated her because of her illness. She resigned in June 2011 but it seems by November 2011 we had noticed losses (10k). The husband then makes various allegations. However the subpostmistress offers a debt management payment which we reject (only £5 per month). We issued court proceedings for the whole debt in [February] this year and the subpostmistress admitted the debt! We then took the steps to place a charging order on the property to try to ensure we actually see the money if we ever sell their property."

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team that we saw before:

"For your information only -- update on this one for you:

"The hearing went ahead last Friday and we were granted a 'Final Charging Order' over Mrs Etheridge's ... house.

"The district judge made it clear this *doesn't* mean [the Post Office] can force her to sell her property. It just protects [the Post Office's] position if she ever does sell."

The bottom point says:

"Apparently Mr Etheridge turned up to court with a bundle of papers, including correspondence with his MP. We have not had sight of this bundle but have requested a copy ..."

If we scroll up, please, there's a response from Ms Vennells, she says:

"Hugh: Thank you very much. Just so I'm clear, does this mean we got the outcome you wanted, ie no adjournment and future repayment of the debt?"

His response is as follows:

"Yes, we got the outcome we wanted and we have the flexibility not to press it further etc if we ever want to be 'caring', etc.

And yes we are looking at the whole area of prosec

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Mr Flemington proposes as follows, he says:

"I think we proceed with the hearing."

Over the page, please, on page 3 at the top of page 3 he says:

"I don't think we should *agree* to any adjournment application as it will just encourage more debtors to play the system and use these tactics to slow down our ability to recovery. *They will all jump on the bandwagon*. We will however need to manage the PR side and Alana has already been briefed by Chris our litigator."

If we scroll down it details the complaint by the subpostmistress's husband it's the fourth pull up there, halfway through that, it says:

"Mr Etheridge appears to have blamed the ATM for the losses, but he never sets out any specific allegations. He also refers to a lack of adequate training and at one point appears to blame staff members for entering inaccurate detail on to the Horizon system. No specific allegations are made about the Horizon system itself. He also accuses the business of failing to provide adequate support."

If we scroll, please, to page 1, the bottom of page 1, Hugh Flemington sends this email to you, Paula Vennells and Susan Crichton. So, again, the same small

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[I think that's prosecutions] etc and things like economic cut-off levels below which we don't chase etc."

Can you assist us with why you were copied into this email?

A. So I -- again, I don't know why I was copied into this email. It may well have been because that enabled them to update Alice, I don't know. I don't remember updating Alice from this email, so -- I don't remember this email but I would imagine it was because it was Horizon issue and Hugh -- or Hugh felt that I needed to know about it.

Q. It looks as though, from the summer of 2012, the Post Office was looking into the whole area of prosecution --

A. Yeah.

Q. -- and things like economic cut-off levels, so perhaps not going after the smaller cases?

A. Yes.

Q. Is that something, as Company Secretary, would have been relevant to your role as Company Secretary?

A. No, I think Susan Crichton as General Counsel was the person leading on that. My only role would have been if and when it came to the Board, so at -- the board were -- it was explained to them what decisions the business were making.

Q. Would it be of relevance to the Board that the whole

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1 area of prosecutions was being rethought at that stage?
 2 **A.** So I don't know if the Board knew that at this point and
 3 my expectation would be that, when we have something to
 4 tell the Board, we would then take that to the Board and
 5 say, "This is what we've considered and this is the
 6 changes we would want to make".

7 **Q.** Do you recall following that up at all, asking any
 8 questions at this stage about the business looking at
 9 the whole area of prosecutions?

10 **A.** I don't because I would have seen there that Susan was
 11 picking that up.

12 **Q.** Would you have independently taken anything forward to
 13 the Board or would you have relied on Susan Crichton to
 14 raise it as an issue with you?

15 **A.** So I would have relied on Susan Crichton.

16 **MR BLAKE:** Sir, that is probably an appropriate moment to
 17 take our first morning break.

18 **SIR WYN WILLIAMS:** All right. What time, 11.10?

19 **MR BLAKE:** Thank you very much.

20 **SIR WYN WILLIAMS:** Fine.

21 (11.00 am)

(A short break)

23 (11.11 am)

24 **MR BLAKE:** Thank you, sir. Can you see and hear me?

25 **SIR WYN WILLIAMS:** Yes, I can, yes.

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1 attention of Second Sight and to James Arbuthnot, Second
 2 Sight were proposing a system whereby subpostmasters
 3 could provide information without fearing that that
 4 information would be used to prosecute them. The draft
 5 announcement says, as follows, it says:

6 "[The Post Office] also recognises that some members
 7 of the Justice for Subpostmasters Alliance may have
 8 concerns about submitting cases for independent review
 9 by Second Sight where even basic case information is
 10 communicated to [the Post Office]. Whilst [the Post
 11 Office] cannot provide any form of immunity from
 12 prosecution in respect of information held by [the Post
 13 Office], in recognition of the concerns expressed by the
 14 JFSA, [the Post Office] agrees not to take any
 15 prosecution action relating to information provided by
 16 JFSA without the agreement of the Board of [the Post
 17 Office] and to deal with each case submitted in
 18 a sensitive manner."

19 Just pausing there, by this stage, undoubtedly you
 20 were aware that the Post Office carried out
 21 a prosecution function?

22 **A.** Yes.

23 **Q.** Could we please turn to the first page, the bottom of
 24 the first page. There's an email from Susan Crichton to
 25 you and Mr Baker. She says as follows:

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1 **MR BLAKE:** Sticking with the summer of 2012, can we please
 2 look at POL00180986, please. If we could please turn to
 3 page 2, 19 July 2012. We have an email here from Ian
 4 Henderson of Second Sight to Susan Crichton, and there
 5 is a draft policy statement regarding what by then is
 6 the Justice for Subpostmaster Alliance submitted cases.
 7 Mr Henderson says:

8 "This is probably way off but this is the sort of
 9 briefing note that Janet and I discussed this
 10 afternoon."

11 Can you recall who Janet was?

12 **A.** So Janet was James Arbuthnot's PA or Executive
 13 Assistant, actually.

14 **Q.** Thank you.

15 **A.** It was Janet Walker.

16 **Q.** The statement, the draft statement, says as follows:

17 "[The Post Office] has agreed that the Office of the
 18 Right Honourable James Arbuthnot should contact Alan
 19 Bates and the Justice for Subpostmasters Alliance and
 20 request that [they] submit approximately 5 of their best
 21 cases for interpreter rem by Second Sight Support
 22 Services Limited."

23 So this is the beginning of Second Sight's work on
 24 those cases. There is a section at the bottom that
 25 addresses individuals bringing their cases to the

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1 "Alwen and Simon -- can we discuss, Ian produced
 2 this at my request because Kay Linnell (forensic
 3 accountant) make much of the fact that she had been
 4 contacted by a number of current subpostmasters who had
 5 issues with Horizon but were too frightened to contact
 6 [the Post Office] because of the consequences ...
 7 obviously we want to be able to review these current
 8 cases but I said that we could not give a blanket
 9 undertaking not to prosecute so this is the result.
 10 What do you think?"

11 Why is Susan Crichton contacting you and Mr Baker?

12 **A.** I think she's contacting me because it mentions the
 13 Board. So, in the proposal, it mentions that the Board
 14 could be -- could almost sign off cases being allowed
 15 into the scheme, into --

16 **Q.** I think the proposal was that they wouldn't prosecute
 17 without the authority of the Board?

18 **A.** Right, yes. So I think that's why Susan has included me
 19 in this.

20 **Q.** If we scroll up, we have your response. You say:

21 "Don't really like the Board being involved but
 22 can't see any way round it. My concern is that this
 23 becomes the route for misbalances and cases that could
 24 be sorted by Angela or Rod and their teams will use this
 25 route for [business as usual]."

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1 Susan Crichton says:
 2 "Thought we could substitute ExCo?"
 3 Is your understanding of that that she is intending
 4 to replace the Board with the Executive Committee in
 5 terms of that authorisation?
 6 **A.** Yes, that's my understanding.
 7 **Q.** Thank you. Then you respond and say:
 8 "Yes, I think so if possible."
 9 It was only, at that stage, five cases that were
 10 being looked at by Second Sight. Why did you not want
 11 that to go to the board?
 12 **A.** Because it might not have stopped at five, and it didn't
 13 feel to me, as if it was a Board decision.
 14 **Q.** Were issues such as misbalances seen as principally
 15 matters for the Executive Committee and below, at this
 16 stage?
 17 **A.** So I think the misbalances -- I think that Angela was
 18 doing -- had already started a piece of work looking at
 19 improving support and I'm -- I would have expected
 20 misbalances to go through there, rather than to come to
 21 the Board.
 22 **Q.** Was this, we see your response there, was that
 23 a decision you made on your own?
 24 **A.** I don't know. I may well have run this past Alice.
 25 I have no evidence that I did that but I may well have

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1 Alice and she believes this, so I can't say one way or
 2 the other whether I spoke to the Chair.
 3 **Q.** Given that it doesn't say, "I spoke to Alice", and given
 4 that it says "My" --
 5 **A.** Then -- sorry.
 6 **Q.** Is it more likely or less likely that this is something
 7 you decided on your own?
 8 **A.** I can't really say but I think it's probably more likely
 9 because I would have put it in the email if I'd spoken
 10 to Alice.
 11 **Q.** Thank you. Can we turn to POL00143704 and the bottom of
 12 the first page. We have an appointment reminder or
 13 place holder, "Room 108 and by [conference] call", and
 14 the attendees required: Susan, that's Susan Crichton;
 15 then you; Simon, Simon Baker; Ron and Ian, that's Ron
 16 Warmington and Ian Henderson. Did you have regular
 17 meetings at this stage with Second Sight?
 18 **A.** So yes, there were regular meetings with Second Sight.
 19 **Q.** How regular were they?
 20 **A.** I can't really say how regular. But we had a lot of
 21 contact with them.
 22 **Q.** Why were you a required attendee?
 23 **A.** So, again, I think it would have been because I went to
 24 the initial meeting with Alice and all the things
 25 flowing from that, and Horizon was now -- we're coming

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1 done.
 2 **Q.** It certainly appears from this email that you were
 3 acting as some sort of filter mechanism for the Board;
 4 is that something that you would routinely do?
 5 **A.** So if anybody had come to me and said, "We would like
 6 the Board to do this", I would general have gone to the
 7 Chair and said -- not necessarily to do with this, to do
 8 with anything in the business -- I would have gone to
 9 the Chair and said, "Do you think this is appropriate
 10 for the Board? Is it the right level?", and we'd have
 11 had that discussion.
 12 **Q.** In this particular case, you're not sure whether you did
 13 that or not?
 14 **A.** I can't remember.
 15 **Q.** Perhaps if we scroll down slightly on this page, we have
 16 the email from Susan Crichton to you at 10.58, your
 17 response at 2.51. Is it likely or unlikely that you
 18 would have had a conversation between those hours?
 19 **A.** I can't say. If Alice had been in the office, for
 20 instance, I may well have popped into her office and
 21 said, "Alice, can I just run this past you?" I --
 22 **Q.** I mean, you refer there to, for example, "My concern is
 23 that this" --
 24 **A.** Yes, I'm not saying -- and it may well -- if I had
 25 talked to Alice, I may well have said I have spoken to

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1 up to, I think, the Second Sight Interim Report.
 2 **Q.** We're still in 2012?
 3 **A.** Oh, okay, sorry.
 4 **Q.** We're still some way off?
 5 **A.** Some way off that, okay. So I think I was included in
 6 things because of the initial contact with Alice and
 7 that's why I was included and was invited to meetings
 8 and --
 9 **Q.** You weren't just invited; you were a required attendee?
 10 **A.** Oh, yes, I --
 11 **Q.** That suggests that you had --
 12 **A.** Sorry, I didn't mean to interrupt --
 13 **Q.** There are only a very small number of people, three
 14 people from the Post Office. It is suggested that you
 15 played more than just, for example, a note-taking role?
 16 **A.** No, I did take part in these meetings.
 17 **Q.** Yes. Could we now move on, then, to 2013 and could we
 18 start with POL00184716. This is February 2013. If we
 19 scroll down, please, there's an email from Mr Warmington
 20 to Susan Crichton. I think you've said in your witness
 21 statement, it's paragraph 163, that you were involved in
 22 ensuring that Second Sight's questions were addressed by
 23 the most appropriate person?
 24 **A.** Yes.
 25 **Q.** Here we have a complaint from Second Sight in relation

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1 to the information that's being provided by the Post
 2 Office. Mr Warmington says as follows, he says:
 3 "Susan:
 4 "As previously reported, Ian and I are getting
 5 seriously concerned about whether [the Post Office] is
 6 getting to grips with issues that we are raising. Only
 7 Angela van den Bogerd seems to have grasped the need to
 8 really dig into these assertions and *join with us* (Ian
 9 and I) in our efforts to seek the truth. An air of
 10 defensiveness still seems to dominate here and we don't
 11 seem to be able to get the message across that there is
 12 no future in [the Post Office] simply trying to 'defend
 13 its patch' by constantly refuting -- with scant effort
 14 or evidence -- every allegation that we put forward."
 15 Was that a complaint that you recognised at the
 16 time?
 17 A. So I'm not sure I do -- or I did. I can't remember this
 18 specific email but I think my role here was to try and
 19 find the right people that could help Second Sight get
 20 what they needed I don't think -- at this point, they
 21 are sharing what they need, I think they're sharing the
 22 allegations with us but I'm not sure we've seen any
 23 evidence at this point. I think we're just responding
 24 to allegations.
 25 Q. Yes.

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1 review.
 2 Q. Expected by who?
 3 A. By the Chair and by the -- you can't say the business
 4 because that's not an entity but, ultimately, by the
 5 Chair.
 6 Q. We'll also see in due course complaints from Second
 7 Sight that they were being provided with large amounts
 8 of irrelevant information. Is that a complaint that you
 9 recognise?
 10 A. I don't remember that. No, I don't remember that.
 11 Q. Let's turn to POL00185741. There's a note of a meeting
 12 with Second Sight, 11 March 2013. Are these your notes?
 13 A. Does it say at the bottom?
 14 Q. It doesn't have a name at the bottom.
 15 A. Unlikely, I think, but they could be.
 16 Q. Attendees, we have you and Simon Baker with Mr Henderson
 17 and Mr Warmington. Were you the most senior Post Office
 18 representative at that meeting, would you say?
 19 A. Yes, probably.
 20 Q. If we scroll down, we have "Items discussed". One of
 21 them is the John Armstrong case:
 22 "Very simple incident.
 23 "Occurred last year.
 24 "Customer wanted to pay for a phone bill, while it
 25 was being processed there was a power failure.

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1 A. And, therefore, maybe it appeared we were defensive.
 2 Q. If we scroll up, please, we then have a response from
 3 Susan Crichton to you, and she says:
 4 "Can we have a chat about this when you get
 5 a moment?"
 6 Do you recall speaking with Susan Crichton about
 7 concerns that were being raised by Second Sight about
 8 an air of defensiveness at the Post Office.
 9 A. I don't. I don't recall.
 10 Q. Why would Susan Crichton want to talk to you about the
 11 content of this email?
 12 A. I don't recall this email. I don't know what she wanted
 13 to talk to me about. It could have been that she wanted
 14 me to help put some more pressure on people to be
 15 providing Second Sight with the information they needed.
 16 Q. Was that part of your role?
 17 A. I did chase people for people, yes, I did chase.
 18 Q. At whose instigation?
 19 A. So, at whose -- so I believed that the Chair had agreed
 20 to this -- the Second Sight review -- the Chair wanted
 21 it to go ahead and my belief was that I had to help it
 22 as much possible to get to the information it needed as
 23 quickly as possible. So why am I doing this? Because
 24 I -- in my -- I believed I was expected to do that
 25 because we'd signed up to Second Sight doing this

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1 "Horizon backed out the transaction -- without
 2 communicating this to the subpostmaster.
 3 "For the first time we have evidence Horizon has
 4 done something without reporting to the subpostmaster.
 5 "These incidents seem to be limited to power or
 6 communication failures.
 7 "Some evidence that subpostmasters have raised these
 8 type of issues with the Post Office but Post Office have
 9 fobbed off the subpostmaster (eg of letter from Andy
 10 Winn).
 11 "We expect to receive this spot review by the end of
 12 the week."
 13 This seems to be the first evidence that they have
 14 seen of -- that Horizon could do something without
 15 a subpostmaster knowing that it was being done; do you
 16 agree with that?
 17 A. So this must be Second Sight's note because they are --
 18 the way it's written. So I don't know exactly what
 19 happens when there's a communication failure. I always
 20 believed that a report was generated by Horizon to tell
 21 the subpostmaster what had happened, what had gone
 22 through and what hadn't. So I'm unclear about how
 23 I would have responded to Second Sight saying this.
 24 Q. If your position before this meeting was that the
 25 subpostmaster would be able to see what went wrong --

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1 and we saw this morning your reference to, for example,
 2 keystrokes and that kind of information?
 3 A. Yes, yes.
 4 Q. You are here finding out that, for the first time, there
 5 is evidence that Horizon has done something without
 6 reporting it to the subpostmaster. That must have been
 7 quite a significant moment for you, mustn't it?
 8 A. So I would have wanted to see the evidence of what
 9 they've got here, what Second Sight are saying add
 10 I don't remember seeing any evidence.
 11 Q. Do you remember asking for the evidence?
 12 A. I don't.
 13 Q. Do you remember doing anything about this particular
 14 information?
 15 A. I don't, because I think I would still have believed
 16 that the subpostmaster could see this disconnect.
 17 Q. We have a meeting with Second Sight where you are the
 18 most senior attendee from the Post Office where you are
 19 being told, for the first time, that they have evidence
 20 that Horizon has done something without reporting it to
 21 the subpostmaster. Must that not have been a very
 22 significant moment in your career?
 23 A. So as I say, I still believed that the subpostmaster
 24 could see this and I would have -- I should have asked
 25 for more evidence, and I don't believe I would have

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1 A. Alice's role, I'd have said.
 2 Q. I think you're the only one who's listed here to be
 3 having a conversation with the Chair. Were you, at this
 4 meeting, effectively the route between Second Sight and
 5 the Chair?
 6 A. Well, I suppose I was always the route between Second
 7 Sight and the Chair. I was the route of anything and
 8 the Chair.
 9 Q. Do you recall a conversation with Alice Perkins
 10 following this meeting?
 11 A. I don't.
 12 Q. Could we please turn to POL00186290. We'll start at the
 13 bottom of the first page, 10 April 2013, Simon Baker
 14 emails to you and to Susan Crichton. Again, it's that
 15 team of three:
 16 "Susan, Alwen
 17 "Next Wednesday morning ... I have scheduled
 18 an offsite meeting with the three of us to get some
 19 thinking time to cover the following points ..."
 20 He sets out there the various points. He says:
 21 "Ian is holding the date in his diary. Ron can't
 22 make it in person, but could join us on the phone."
 23 So it seems as though they're trying to schedule
 24 a meeting with Second Sight, Ian and Ron; do you recall
 25 that?

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1 done. I wasn't -- although I was the most senior person
 2 here, I'm not the IT person here, Simon is. So I would
 3 have expected him to have also picked up on this.
 4 Q. Second Sight were your independent investigators --
 5 A. Yes.
 6 Q. -- who had been appointed by the Post Office to carry
 7 out an independent investigation. Whether you, somebody
 8 who wasn't familiar with IT, thought or didn't think
 9 that the system could do something, you're here being
 10 told that, in fact, it can do something without telling
 11 a subpostmaster?
 12 A. So yes, that is a serious issue. I don't remember in
 13 Second Sight's Interim Report it having this.
 14 Q. That's further down the line. We're now only in March
 15 2013.
 16 A. Yes, yes.
 17 Q. But do you recall raising it ...
 18 A. I don't, no.
 19 Q. If we look down, there are actions and it says:
 20 "Alwen to discuss with Alice the confidentiality
 21 conditions of the MPs meeting and her status/role at the
 22 meeting."
 23 Can you assist us with the "her status/role at the
 24 meeting"; is that your role or Alice's role at the
 25 meeting?

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1 A. No I don't recall that specific meeting.
 2 Q. If we scroll up, please, we have a response from you.
 3 You say:
 4 "This isn't in my diary ..."
 5 I think that must be:
 6 "... I am [perhaps 'meant'] to be with Alice in
 7 [Wednesday] morning."
 8 A. Yes.
 9 Q. If we look at the top email from Susan Crichton to you:
 10 "Alwen are you going to be with her all morning.
 11 Simon and I need some time with you to work out the
 12 strategy for taking this forward, and your input was key
 13 as we need to decide how we deal with the aftermath of
 14 the [James Arbuthnot] meeting and how to take this
 15 forward."
 16 It seems from that email that Susan Crichton has
 17 formed the view that your input is key in those
 18 meetings; is that something you would agree with or not?
 19 A. Well, it is key because they want to decide in the
 20 aftermath of the James Arbuthnot meeting, so it's key
 21 because, again, they want my input, clearly, and it
 22 would be input with the Board in mind and with things in
 23 mind that -- because that's the position I came from.
 24 Q. You say with the Board in mind?
 25 A. Or, sorry, with the Chair in mind.

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1 Q. With the Chair in mind?
 2 A. Yes, not the Board.
 3 Q. So this is, again, with the background, if we trace it
 4 back to where we started this morning with the meeting
 5 with James Arbuthnot, the meeting with Oliver Letwin --
 6 A. Yes.
 7 Q. -- you were, in your view, acting on behalf of the Chair
 8 in these meetings that followed with Second Sight?
 9 A. Yes.
 10 Q. Had you been asked to carry out that role by the Board?
 11 A. No.
 12 Q. Did you see your role as acting in this role as Company
 13 Secretary, or as something else?
 14 A. I don't think you could say it was the traditional
 15 company secretary role. I think it was wider than that.
 16 Q. Wider or separate to that?
 17 A. I think -- still think it was predicated on the Chair
 18 and going back to supporting the Chair and being the
 19 Chair's ears and eyes in the business, if you like. So
 20 I think it was still supporting that role.
 21 Q. In your training to become company secretary, was part
 22 of that training informing you that you were to be the
 23 Chair's ears and eyes on the business?
 24 A. So I think there was something about facilitating the
 25 Chair -- the chair's connection with the business,

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1 were times when I thought then, "This is a lot of work
 2 on top of my traditional company secretary role", and
 3 I probably think the same now.
 4 Q. Why were you being asked to do this role?
 5 A. I think some of it was about herding the business to try
 6 to get them to respond to questions and information for
 7 Second Sight. So I think I was being asked to
 8 facilitate the independent -- getting information to the
 9 independent review.
 10 Q. Could we please turn to POL00186602. We're now on 7 May
 11 2013. At the bottom of the page, Mr Baker emails Angela
 12 van den Bogerd, Susan Crichton and you, and he says:
 13 "I would like to release the Spot Reviews to Second
 14 Sight tomorrow evening. Any chance I could have your
 15 comments or approval by the end of day tomorrow?"
 16 If we scroll up we have your response, which is:
 17 "You already have my sign off Simon."
 18 Why, again, as Company Secretary, would you need to
 19 sign off the provision of spot reviews to Second Sight?
 20 A. So I don't remember this email but I think what's --
 21 when the spot reviews were put together, there were
 22 certain people that owned parts of the spot review
 23 because they were subject experts in those areas. So,
 24 for instance, Angela would have owned anything to do
 25 with the Network, Lesley would have owned or -- would

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1 and -- but this is a long -- quite a long time ago now.
 2 I can't specifically remember what was in that training.
 3 Q. But did you see it as part of your role as Company
 4 Secretary to be attending these kinds of meetings and to
 5 be pursuing objectives on what you understood to be on
 6 behalf of the Chair?
 7 A. No, I think it was wider than my traditional Company
 8 Secretary role.
 9 Q. Was that something you ever discussed with the Chair,
 10 "Why am I performing a job that is not, in fact, the job
 11 of a company secretary?"
 12 A. I can't remember having that conversation with the
 13 Chair. I had weekly one-to-ones with the Chair and the
 14 Chair would have known I was doing this work, so -- but
 15 I don't specifically remember asking her "Do you want me
 16 to do this work on your behalf?"
 17 Q. But did you have any concerns that you're being asked to
 18 do a role that is, in fact, not the role of a company
 19 secretary?
 20 A. I don't think so at the time.
 21 Q. Looking back at it now, do you think you were being
 22 asked to do a role or carrying out a role that was not,
 23 in fact, your role?
 24 A. I think, as time went on, and this became -- there was
 25 more to do in this role, if you like, I am sure there

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1 have owned anything to do with IT and so I don't think
 2 there were any specific areas that I had to sign off
 3 because I wasn't the subject matter expert, which is why
 4 I'm saying -- I think why I'm saying to Simon "You've
 5 already got my" -- "I'm happy for you to send these but
 6 you need everybody else's input first".
 7 Q. You're not saying there, "You don't need my sign off",
 8 though --
 9 A. No.
 10 Q. -- you're saying, "You already have my sign off"?
 11 A. Yes, yes.
 12 Q. Why would you have needed to sign off the provision of
 13 information to Second Sight?
 14 A. So -- and I can't remember this email, as I say, but
 15 I don't think I am signing off the information. I think
 16 I'm signing off "This is what the spot reviews looked
 17 like and, if it's not me providing information and
 18 detail in that area, that person should be signing it
 19 off, not me, but I am happy for this to go to Second
 20 Sight". I don't think I'm signing off the detail.
 21 Q. No, but Mr Baker is saying, "I would like to release the
 22 spot reviews to Second Sight", can he have your comments
 23 or approval and you say, "You already have my sign off".
 24 It certainly reads as though you are signing off the
 25 release of the spot reviews to Second Sight. My

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1 question is: why would you, Company Secretary, need to
 2 sign off the release of the spot review to Second Sight?
 3 **A.** So, as I say, I can't remember this. It may well have
 4 been that Simon and I have had a conversation about the
 5 spot reviews and I've said to him "When you've got all
 6 the information, then, you know, it doesn't need my
 7 further sign off. You're getting information from all
 8 these people". But I'm --
 9 **Q.** It doesn't say, "You don't need my sign off", it says,
 10 "You already have my sign off".
 11 **A.** So then I would have said that to him face-to-face.
 12 That's what I'm assuming. I am assuming this -- there
 13 hasn't been another email where I've signed this off.
 14 This is, I think, I've had a conversation with Simon
 15 which says, "The spot reviews need to get to Second
 16 Sight", and he's going and asking for information is
 17 right in the spot reviews, and I've already that the
 18 conversation which said, "Yes, we need to get these to
 19 Second Sight". But that's just me surmising when
 20 reading this now.
 21 **Q.** Why, as Company Secretary, would you need to sign off
 22 the provision of information to Second Sight?
 23 **A.** So, as company secretary, I don't think I did have to
 24 sign it off.
 25 **Q.** Thank you. Could we turn to POL00029588. The second

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1 not be aware that there is, in fact, a receipts and
 2 payments mismatch.
 3 At the bottom of this page, he says:
 4 "One of the situations that we are taking as
 5 a result of the Local Suspense problem we found this
 6 year is to put some further checks in for 'situations
 7 that should never happen' that related to that problem
 8 and to raise an alert if they do."
 9 The reference there to "situations that should never
 10 happen", did that strike you at all? We will see that
 11 you are copied in to that email. Is this is an issue
 12 that caused you any concern as at 16 May 2013?
 13 **A.** So the way I'm reading this that the mismatches should
 14 never happen, so the --
 15 **Q.** Should never happen?
 16 **A.** Yes, should never happen. So the piece above where the
 17 final report mismatch, that's the way I'm reading that,
 18 is that, in the future, those things should never
 19 happen.
 20 **Q.** But, also, that things have occurred that shouldn't
 21 happen and that wouldn't necessarily be visible to
 22 a subpostmaster?
 23 **A.** But where is -- you see, I can't see anywhere here that
 24 it's not visible to the subpostmaster.
 25 **Q.** Well:

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1 half of the page, please, is an email from Gareth
 2 Jenkins to Mr Baker. So by 16 May 2013, did you know
 3 who Gareth Jenkins was?
 4 **A.** I did, yes.
 5 **Q.** How did you know who he was?
 6 **A.** Mainly from these emails.
 7 **Q.** Can you recall when you first approximately came into
 8 contact, was it in this context?
 9 **A.** I think so, yes.
 10 **Q.** Was it gathering information for Second Sight?
 11 **A.** Yes.
 12 **Q.** Yes. The subject is "Balancing issues in 2010", and
 13 he's setting out there, I think, what we know as the
 14 receipts and payments mismatch issue. I'll just read to
 15 you a little bit from that email. He says:
 16 "If the clerk presses Cancel ... and on the rollover
 17 screen then presses Rollover again, then the Final
 18 Balance report will have Receipts/Payments mismatch
 19 (Total Receipts not equal to Total Payments) which will
 20 ultimately lead to a Non-zero Trading Position on the
 21 Branch Trading.
 22 "If the clerk does not check the Final Balance
 23 report, he/she may not be aware that the report has
 24 a Receipts/Payments mismatch."
 25 So the net effect is that the subpostmaster might

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1 "If the clerk does not check the Final Balance
 2 report, he/she may not be aware that the report has
 3 a Receipts/Payments mismatch."
 4 **A.** But it's in the final balance report.
 5 **Q.** Yes.
 6 **A.** I'm not for a moment saying that it's right but I'm
 7 saying, when I read this, my belief was that the clerk
 8 could still see the mismatch.
 9 **Q.** But would it be of concern to you that Mr Jenkins from
 10 Fujitsu was identifying that there were situations that
 11 should never happen, that didn't necessarily have
 12 an alert and that, in future, one of the actions they
 13 were taking was to put in some further checks for such
 14 problems and raise an alert if they did occur; did that
 15 cause you any concerns?
 16 **A.** So -- and I can't remember reading this but, reading it
 17 again, the way I think I would have read this was: this
 18 has happened, it was clearly wrong that it happened, it
 19 does appear in the balance -- so, that's the first thing
 20 I would have picked up from here -- however what he's
 21 saying is, in the last paragraph here, "But we have put
 22 something in place so this should never happen again",
 23 and that there will be another alert, alongside, you
 24 know, the mismatch that -- that is visible, "We will
 25 give another alert to the subpostmaster". That's the

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1 way I'm reading it.

2 **Q.** That is how Simon Baker communicates it above. If we

3 scroll above, we can see an email from Mr Baker to

4 Lesley Sewell and you, saying:

5 "Lesley, Alwen

6 "Brief overview of the problem encountered in 2010

7 below.

8 "The reassuring point, for those looking for

9 comfort, is that in this case Horizon's monitoring

10 systems automatically picked up the anomaly."

11 "For those looking for comfort", but were you in any

12 way concerned by the contents of that email?

13 **A.** Well, I think I would have been concerned -- I can't

14 remember the email but I think I would have been

15 concerned that this had happened in the first place.

16 **Q.** Yes.

17 **A.** That would have caused me concern but I think -- I don't

18 think I was looking for comfort. I think that the rest

19 of the email would have given me comfort that (1) the

20 subpostmaster can see it happening and, secondly, now

21 that it has happened, Fujitsu would put something in

22 place to ensure the subpostmaster could see it.

23 **Q.** Why was Mr Baker emailing just you and Lesley Sewell on

24 this issue?

25 **A.** I don't know. Are we both -- if you go down further

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1 **Q.** Were you aware that he had given evidence in criminal

2 prosecutions?

3 **A.** No.

4 **Q.** Were you aware that he'd given evidence in any court

5 proceedings?

6 **A.** No, not that I remember.

7 **Q.** Could we look turn to POL00186943, please. If we could

8 look at the second of those emails, 21 May 2013, so

9 shortly -- the previous email that we looked at was

10 16 May; this is 21 May. This is from you to Alice

11 Perkins and the subject is "James [Arbuthnot] meeting".

12 You say:

13 "Alice I wanted to apologise for the lack of clarity

14 at the meeting today. Paula and I have had

15 a conversation about the way forward and the need to

16 ensure Second Sight are working to their terms of

17 reference, finding out the facts and not focusing so

18 much on keeping the [Justice for Subpostmasters

19 Alliance] on board.

20 "The [Justice for Subpostmasters Alliance] issue

21 will be picked up in the wider stakeholder piece which

22 Paula and I have already discussed with Mark and Martin

23 Edwards about.

24 "I have spoken to Second Sight and also to Susan who

25 is contacting Second Sight this evening to reiterate our

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1 down, are we both on the email further down?

2 **Q.** No.

3 **A.** No, so he's sending this on to us, okay. I don't know

4 why, whether I was chasing something for someone.

5 I understand why Lesley would be on there because she's

6 the Chief Information Officer. She's the conduit with

7 Fujitsu, so it's right that she should be on there and

8 whether this is me chasing something or -- I don't know.

9 **Q.** Do you want to try and see if you can think about why

10 only two people from the Post Office were copied into

11 that email, or sent that email, and it was you and

12 Lesley Sewell? We've heard that Lesley Sewell was Chief

13 Information Officer but why you?

14 **A.** I really don't know. Maybe I'm the only person that

15 doesn't know about this yet.

16 **Q.** Is it likely you would have discussed that with the

17 Chair or the Chief Executive?

18 **A.** So I do know -- and I cannot remember the date but I do

19 recall that there was a conversation with the Chair

20 about bugs because -- and before the Second Sight

21 Report. So there was that conversation. Whether it was

22 predicated on this email, I cannot remember.

23 **Q.** In terms of Mr Jenkins, you said that you became

24 familiar with him around this time?

25 **A.** Yes.

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1 concerns and to ensure that they are focused on

2 delivering the 2-3 MP cases before the summer. Which

3 they promised me they would do.

4 "I would like to clarify one point as I realised

5 that you and Paula were both disappointed with the time

6 which has elapsed since the exchange of letters between

7 James and [Justice for Subpostmasters Alliance] written

8 on 16 April and felt we should have moved things on.

9 "I should explain that we were not copied in on

10 these letters but received them from Second Sight as

11 blind copies two weeks after they were written. This

12 has made reference to them very difficult, and managing

13 the ongoing timelines and agenda challenging.

14 "I believe the call with James on Thursday and

15 a subsequent meeting after recess will help us

16 understand his position in moving this to closure, and

17 also enable us to drive the agenda more proactively."

18 Can you assist us with why -- first of all, what do

19 you recall of the James Arbuthnot meeting, very briefly,

20 that took place on 21 May?

21 **A.** The one after this?

22 **Q.** No, the one that you're apologising in relation to.

23 **A.** So I'm -- I think this is -- I can't specifically

24 remember but I think this is the -- a pre-meet for

25 a James Arbuthnot meeting, and it's -- this -- so

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1 I don't think James was at this meeting. I think this
 2 is a meeting with Alice and Paula, and presumably other
 3 relevant people who are -- you know, Mark might have
 4 been there, I don't know who was there, but I don't
 5 think James Arbuthnot was in this meeting.

6 **Q.** Thank you. So this was a pre-meeting before a meeting
 7 with James Arbuthnot?

8 **A.** That's my understanding.

9 **Q.** You seem to be concerned, requiring an apology for
 10 a lack of clarity. Can you assist us with why you were
 11 apologising?

12 **A.** I don't remember this meeting but if I've apologised for
 13 a lack of clarity it's likely that Alice has left the
 14 meeting not very pleased with how it has gone,
 15 basically. And I think it may be something to do with
 16 the copy of the letter, which we -- I allude to further
 17 down and that she would have expected us to have done
 18 more, if we'd had that letter since the 16 April. So
 19 I suspect that we didn't get as far in this meeting as
 20 we would have hoped to get.

21 **Q.** There also seems to be some concern that has been raised
 22 about Second Sight working outside of their terms of
 23 reference, for example. Do you recall concerns being
 24 raised by Paula Vennells regarding Second Sight working
 25 within their terms of reference?

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1 straightforward and frank.

2 "I think it would be worth having a chat about this
 3 at some point soon. There are some things to learn from
 4 it.

5 "In the meantime, we must get into a different gear
 6 on this issue. We stood to gain a huge prize from
 7 embarking on this ... "

8 Just pausing there, what did you understand to be
 9 the "huge prize"?

10 **A.** So again, it's her words but I think she was talking
 11 about an opportunity to show that the computer, Horizon,
 12 was -- had integrity. I think that's where she is
 13 coming from and to be able to show to the MPs -- because
 14 Alice's main concern was the MPs -- was to show to the
 15 MPs that -- what had actually happened.

16 **Q.** "... huge prize from embarking on this though it was
 17 never going to be easy. We have almost blown it on more
 18 than one occasion and if it goes wrong it will be hugely
 19 damaging. Too bad if we find substantive things which
 20 are wrong. But if what goes wrong is self-inflicted,
 21 that would be inexplicable.

22 "This is not all down to you by any means but I do
 23 think in practice you have a pivotal role of only to
 24 bring things to my attention -- which you have sometimes
 25 done."

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1 **A.** So I think -- and I think the -- later on, we'll
 2 probably get to it -- the Board were also concerned
 3 about the speed at which Second Sight were producing
 4 evidence and I think, certainly for Alice, I think
 5 Alice, when we started the review, wanted a forensic
 6 review to look at the Horizon computer. That's what
 7 I think, and you'll have to Alice and you'll no doubt
 8 have a chance to do so, but that's my belief, that Alice
 9 wanted to know that the computer worked, basically.

10 And what was becoming more apparent was that Second
 11 Sight were looking in a much more wider frame than "Does
 12 the computer work?", and I think that's what these
 13 conversations were about.

14 **Q.** You're apologising there. Is that something you
 15 regularly did to Alice Perkins; is that something
 16 unusual, something that stood out?

17 **A.** I wouldn't have said it was regular but I -- if I did
 18 feel that something hadn't gone as well as I would have
 19 wanted it to go for the Chair, then I would apologise
 20 because it's, you know, it's easy to apologise and say,
 21 "I'm sorry, Alice, we didn't have as good a meeting as
 22 we had hoped to have today".

23 **Q.** If we group we can see Alice Perkins' response, she
 24 says:

25 "Thank you for saying all this. Characteristically

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1 What did you understand by that?

2 **A.** Well, again, you'd have to ask Alice what she meant by
 3 that but I took from that -- again, from rereading the
 4 email -- that we were taking too long to do things.

5 I mean, it's interesting, in Alice's head, you know, if
 6 we find substantive things wrong with the computer, then
 7 let's find those things wrong with the computer and have
 8 proper evidence there's things wrong with the computer
 9 and put them right. That's sort of what I'm reading
 10 from this.

11 **Q.** What did you understand by "self-inflicted" to have
 12 been? It seems to be a criticism of yourself or --

13 **A.** I don't think it is. Well, it might have been. I don't
 14 think it is. I think it's that the business has not
 15 provided things and has not -- and it's an independent
 16 review, so it's not a case of, you know -- because
 17 I know the word "managing" that review has been used at
 18 a later stage in the Board. It's not a case of managing
 19 that review; it's enabling that review to get to a place
 20 that review needs to get to and get to it quickly.

21 I'm not reading that as personal to me but I could
 22 be wrong.

23 **Q.** She then says:

24 "This is not ..."

25 I've put the emphasis on the word "all":

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1 "This is not all down to you by any means but I do
2 think in practice you have a pivotal role ..."
3 What did you understand by "of only to bring things
4 to my attention"?
5 A. I think it should be "if only".
6 Q. "If only to bring things to my attention"?
7 A. So that's me coming back to the fact that the things
8 I was doing, I was doing on behalf of Alice and, here,
9 she's making it very clear that, you know, the role that
10 you need to bring things to my attention.
11 Q. Then she says "which you have sometimes done"?
12 A. Yes, yes.
13 Q. Would you have read that to mean not always?
14 A. Not necessarily. It's a bit damned with faint praise,
15 isn't it, really?
16 Q. Do you read this email or did you read this email as
17 a bit of a telling off from the Chair? I mean, you've
18 apologised in the email below and it's not just "Thank
19 you very much for apologising", it's then just raising
20 some concerns about something that could be hugely
21 damaging to the business?
22 A. So, yes, I would have had taken this as a telling off
23 from the Chair.
24 Q. Is it something that you recall that stands out in
25 memory, being criticised by the Chair of Post Office?

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1 Q. Was there increased pressure coming from above during
2 this period, in light of Second Sight's investigation
3 seemingly, potentially causing problems for the
4 business?
5 A. Who do you mean by "from above"?
6 Q. Entirely up to you.
7 A. Oh, okay. Well, there's pressure here from Alice, isn't
8 there, because I can see it in this email, that this
9 meeting has not gone very well, I've apologised because
10 I knew she left the meeting not very happy and she's
11 come back and explained why she wasn't very happy, in
12 terms of tensions between -- yes, there was pressure,
13 there was clearly pressure, we were doing a lot of work,
14 trying to get Second Sight to do a place where they
15 could do the Interim Report, trying to get them to focus
16 on evidence, and there may well have been pressure, you
17 know, or -- between Alice and Paula. I don't know.
18 Q. Could we please turn to POL00105632. This is the very
19 next day, 6.00 in the morning, an email from you to
20 Paula Vennells, copied to Martin Edwards, Mark Davies
21 and Susan Crichton. You say:
22 "Paula the only things that is not for the brief for
23 James is our move away from 'there are no bugs in
24 Horizon' to 'there are known bugs in every computer
25 system this size but they are found and put right and no

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1 A. As I say, I didn't remember this email, so it couldn't
2 have stood out for me.
3 Q. Do you remember significant tensions towards the end of
4 May 2013 with the Chair, in respect of the Second Sight
5 investigation?
6 A. Not between myself and the Chair, no. I don't remember
7 that. Whether there were other tensions with other
8 people --
9 Q. Do you recall increased pressure at this time in the
10 business in relation to the work that Second Sight were
11 carrying out at the time?
12 A. Yes. Yes, I do.
13 Q. Do you recall concerns that the Second Sight
14 investigation could be hugely damaging?
15 A. So Alice is saying, "If it goes wrong it will be hugely
16 damaging"; I don't think she's saying that it's going to
17 be hugely damaging.
18 Q. "We have almost blown it on more than one occasion ..."
19 A. Yes.
20 Q. "We stood to gain a huge prize from embarking on this
21 ..."
22 A. And I think this is all about how long it's taking and
23 the clarity of Second Sight in Alice's mind looking at
24 the computer. I think that's what she's talking about
25 here, but I --

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1 subpostmaster is disadvantaged by them' it would be good
2 to be able to go on and say 'or has been wrongly
3 suspended or prosecuted'.
4 "I do not think that is a phone call conversation
5 but needs to be aired at some point with James, I would
6 suggest at your meeting."
7 "Our move away from 'There are no bugs in Horizon';
8 who is 'our'?"
9 A. So I think this is talking about a brief for James'
10 meeting and I can't remember who was putting that
11 together. It may have been Martin Edwards, it may have
12 been Mark Davies. I can't remember and I've -- this is
13 me saying -- this is me saying, in the brief -- I've
14 obviously read the brief for James and, in the brief for
15 James, we are silent on there are no -- you know, we are
16 silent on the fact that we have found bugs.
17 So I believe this is me saying we need to be upfront
18 here and we need to be honest and we need to say we have
19 found some bugs in Horizon, and well, as you can read.
20 Q. "... but they are found and put right and no
21 subpostmaster is disadvantaged by them' ..."
22 A. That's -- sorry.
23 Q. How could the Post Office say that or be confident in
24 that?
25 A. Well, I think what I'm saying here is we need evidence

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1 that we can -- if we want to say these things, we need
 2 evidence that they are 100 per cent true and the same --
 3 you know, the same true of or have been wrongly
 4 suspended or pros -- if we want -- if we're going to say
 5 to James anything on bugs, we need to be absolutely
 6 clear that that statement is true, that they've been
 7 found, put right and no subpostmaster is disadvantaged
 8 by them.

9 **Q.** But aren't you saying that is what James needs to be
 10 told?

11 **A.** No, I'm saying --

12 **Q.** You're saying it's not in the brief, there isn't
 13 anything in the brief for James --

14 **A.** Yes.

15 **Q.** -- that has our new line, our new line being not that
 16 there aren't bugs in Horizon but that there are bugs,
 17 that that arises in every computer system, but they are
 18 found and put right and no subpostmaster is
 19 disadvantaged by them. That was the new corporate line,
 20 it seems from this email.

21 Two questions, really: where did that corporate line
 22 originate from and, secondly, how could you be confident
 23 that that was correct?

24 **A.** Well, I wasn't confident that was correct. I'm asking
 25 the question here. I'm not saying, "Put these two
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1 **A.** I can't remember if those are my words or if I'm saying
 2 "It would be good to be able to say, 'or have been
 3 wrongly suspended or prosecuted' but we mustn't go on
 4 and say that if it isn't true".

5 **Q.** Where is that in that email?

6 **A.** Well, it's not written but no one -- I don't believe
 7 that we would have put that in a brief if we didn't --
 8 if we hadn't checked it. Susan is on this email so --

9 **Q.** It wasn't in the brief, though?

10 **A.** It wasn't --

11 **Q.** "Paula, the only thing that is not in the brief for
 12 James is our move away", and the move away is not "There
 13 are no bugs", but now "There are bugs but they're found
 14 and put right and no subpostmaster is disadvantaged by
 15 them".

16 **A.** Yes, yes.

17 **Q.** Where, in this correspondence, does it suggest, in any
 18 way, that that might not actually be accurate and that
 19 that needs to be looked into?

20 **A.** Well, it doesn't, in this correspondence. However, I do
 21 not believe that it would have been included in a brief
 22 if we weren't sure that it was right.

23 **Q.** How can you be so sure?

24 **A.** I can't be. I can't be. This is an email from me to
 25 Paula saying "The only thing that's missing out of
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1 things in the brief for James", I'm saying the brief for
 2 James needs to cover bugs and, if we have the
 3 information that says we can say that sentence, in
 4 parenthesis, and the final sentence, if we have that
 5 information, that should be in James' brief.

6 I'm not -- I --

7 **Q.** Where are you saying, "If we have that information"?

8 **A.** I'm saying it would be good to say but --

9 **Q.** No, you're saying, "It would be good to be able to go on
 10 and say 'or has been wrongfully suspended or
 11 prosecuted'". You weren't sure you could go that far
 12 but it does seem from this email that you thought you
 13 could at least say that they're found and put right and
 14 no subpostmaster is disadvantage by them, or have
 15 I misinterpreted that email?

16 **A.** I personally think you've misinterpreted that email but,
 17 you know, I can't specifically remember sending this
 18 email. I do know I would not have wanted anything to be
 19 in a brief for anyone that wasn't an accurate piece of
 20 information.

21 **Q.** So where are those words that are quoted here from?

22 **A.** I can't remember but they are quoted. I don't think
 23 they're my words.

24 **Q.** Well, you are proposing the addition of "or has been
 25 wrongfully suspended or prosecuted", aren't you?
 90

1 James' brief is a comment on bugs, and I would like it
 2 also to be clear about prosecutions". But I'm not --
 3 this is not saying just put these in the brief without
 4 anybody checking anything.

5 **SIR WYN WILLIAMS:** Can I tell you, Ms Lyons, how I read it,
 6 which I think is very similar to Mr Blake. First of
 7 all, you were saying there's nothing in the brief about
 8 a move in the Post Office position from "There are no
 9 bugs in Horizon" to "There are known bugs in every
 10 computer system", et cetera, all right? My reading of
 11 that is not least buttressed by evidence I've heard from
 12 other sources, that, by this stage, that was the Post
 13 Office's position, either because Second Sight had
 14 tipped them the wink or, more likely, because there were
 15 people in Post Office who knew, of course, that there
 16 were bugs in Horizon by this stage. All right?

17 So that's the Post Office line, which you identify
 18 as not being in the brief. Then you go on to say, "And
 19 it would be good" -- in other words "if we can" -- "can
 20 we say 'or has been wrongfully suspended or
 21 prosecuted'", where I accept that the inference to be
 22 drawn from that is you're only going to say if it's
 23 accurate but you're hoping that it can be said, all
 24 right?

25 Then, just as a matter of detail, I think, from
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1 previous emails, it's clear that there was to be a phone
 2 call conversation with Lord Arbuthnot on 23 May, if you
 3 go back to the previous emails, you'll see that, and you
 4 saying it's not appropriate to have this in
 5 a conversation but, rather, in a meeting, which is going
 6 to take place at some future time.
 7 That's as I read it, Ms Lyons. Have I got that
 8 hopelessly wrong?
 9 **A.** No, I think that's helpful. Thank you.
 10 **MR BLAKE:** Is it helpful or accurate?
 11 **A.** It's helpful because I can't now say what was in my mind
 12 in 2013 but, reading that, I would say that it's
 13 accurate to the way I'm reading it now.
 14 **Q.** The "or has been wrongfully suspended or prosecuted",
 15 was that something you were aware the Post Office had
 16 confirmation of, or was --
 17 **A.** I wasn't sure, so that's why I was asking.
 18 **Q.** Do you recall anybody coming back to you and saying
 19 that's accurate or not accurate?
 20 **A.** I don't and I don't know if that ended up in the brief,
 21 and with -- if we felt comfortable to say that.
 22 **Q.** It's quite a significant shift in the Post Office's
 23 position at this time from "No bugs" to "There are
 24 bugs". Was that something that was raised at Board
 25 level at this time?

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1 (A short break)
 2 (12.25 pm)
 3 **MR BLAKE:** Thank you, Ms Lyons.
 4 Could we please turn to POL00098655. Moving on to
 5 21 June 2013. This is an email from you to Paula
 6 Vennells and Lesley Sewell, and copied to Susan
 7 Crichton. So, again, that small group of individuals
 8 who have been in a number of emails that we've been
 9 looking at today:
 10 "Paula
 11 "As you medicinal remember [James Arbuthnot] is
 12 hosting a meeting on 8 July where [Second Sight] are
 13 going to present their interim findings to MPs and
 14 [Justice for Subpostmasters Alliance], on 3 MP cases.
 15 "We had a call with Second Sight today and have now
 16 put in place calls every day from next Tuesday to take
 17 us through to their report being ready.
 18 "There are still risks with what the report will
 19 say. Not around the system but around the wider issues
 20 eg training and support (which [Second Sight] are
 21 counting as part of the Horizon operating model).
 22 "I am sure that there will be enough in the report
 23 for JFSA to cause mischief if they want to with the
 24 media, and Ruth is involved in updating the comms plan.
 25 "[Second Sight] have a call with James on 2 July and

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1 **A.** I can't remember if it was raised at Board. I do
 2 remember it being raised with the Chair but I would have
 3 to check minutes about the Board, but -- and it was
 4 a shift. It was -- you know, until that time, I naively
 5 didn't think there were bugs in Horizon.
 6 **Q.** So that was quite a significant moment in time, this
 7 shift?
 8 **A.** Yes, I think it was.
 9 **Q.** If it isn't contained in, for example, Board minutes, at
 10 that particular time, what would you have to say about
 11 that?
 12 **A.** Well, I think it -- I think it should have come to the
 13 board. It certainly -- the Chair, it certainly went to
 14 the Chair, and I cannot remember whether we had
 15 a conversation about it, and about it coming to Board.
 16 Clearly it came to Board when the Second Sight Report
 17 came to Board. But that's later.
 18 **MR BLAKE:** Yes.
 19 Thank you, sir. That might be an appropriate moment
 20 to take our second morning break.
 21 **SIR WYN WILLIAMS:** Yes. What time shall we resume?
 22 **MR BLAKE:** 12.25, please.
 23 **SIR WYN WILLIAMS:** Yes, by all means.
 24 **MR BLAKE:** Thank you very much.
 25 (12.13 pm)

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1 you have a call with him on the 3rd and we should know
 2 in advance what the report will say and therefore what
 3 they are likely to say to James.
 4 "Things will get clearer next week but my biggest
 5 concern at the moment is if the review focuses on
 6 training, et cetera, how the [Justice for Subpostmasters
 7 Alliance] will respond. I think you can make some
 8 positive noises to [James Arbuthnot] on the 3rd
 9 including improvements in training and support and also
 10 our idea of a Horizon user group made up of existing
 11 subpostmasters who use the system.
 12 "I will get an update in the diary for us and Lesley
 13 on Wednesday next week."
 14 It seems, by this stage, so 21 June 2013, even, you
 15 are having quite a significant role in matters relating
 16 to the Second Sight investigation.
 17 **A.** So I cannot remember this email. I think this email --
 18 and I can't remember it specifically -- might be me
 19 putting down on paper what a group of people have
 20 discussed. So I think this might be me going to Paula
 21 and saying, "Right, as you remember, we've got this
 22 meeting", and so I don't think these are only my words
 23 but I've got no evidence of that.
 24 **Q.** "I am sure there will be enough in the report"; "My
 25 biggest concern at the moment" -- the penultimate

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1 paragraph "Things will get clearer next week but my
2 biggest concern at the moment"; "I think you can make
3 some positive noises to [James Arbuthnot]". I mean,
4 there's no "We" in that email is there?

5 **A.** No, I accept that and it's written in the first person
6 so it's me saying this to Paula, I accept that.

7 **Q.** Do you accept, irrespective of whether you remember the
8 email, don't remember the email, that, by the summer of
9 2013, you were clearly not just collating documents for
10 Second Sight; you were having some strategic input on
11 the response to Second Sight?

12 **A.** I think I was trying to put in place a journey to the
13 Interim Report and trying to understand who is seeing
14 who, when, and when we needed to brief people, and
15 whatever. So yes, I am trying to lay out how we get to
16 the Second Sight Interim Report.

17 **Q.** "I think you can make some positive noises to [James
18 Arbuthnot] including improvements in training and
19 support ..."

20 I mean, that's not simply laying something out, is
21 it? That's making a positive suggestion to the CEO as
22 to how she should respond to the Second Sight Report?

23 **A.** Well, she will have seen what we've seen. So, in the
24 paragraph above where it says that there are no issues
25 around -- not issues around the system but around

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1 James Arbuthnot, for instance, yes, I am, and that she
2 can talk about training and support. So if that's
3 advice, then yes, this email is advice.

4 **Q.** You say "if that's advice"; is that advice or is that
5 not advice?

6 **A.** Yes, that's advice.

7 **Q.** Can we turn to POL00188912. This is an email we will
8 return to on the issue of remote access but I want to
9 look at something else. It's the bottom email from
10 Simon Baker, again very small distribution list, to you,
11 Susan Crichton and Lesley Sewell. Subject "Second Sight
12 Call", and it's number 2, "Bugs in Horizon". This is
13 a call, a very animated call with Ron and Ian:

14 "Bugs in Horizon: They are concerned that [James
15 Arbuthnot] is or has been told by Post Office that there
16 are no bugs in Horizon, and that is what [James
17 Arbuthnot] believes and when Second Sight inform him
18 that there were bugs, and subpostmasters accounts were
19 affected it will go 'viral' amongst MPs and the press --
20 my suggest here is that Paula gives this news to James
21 first and explains to him why this isn't a problem. We
22 may also want to go to the press first on this, as part
23 of are overall message, to get out our message out
24 first."

25 If we scroll above, there's a response from you but

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1 training and support, that's what we were being told at
2 the time, and what I'm saying to Paula here is that
3 there are things that she can discuss with James about
4 how things are being improved and are being changed.

5 **Q.** Ms Lyons, isn't it now time to reflect on your work on
6 the Second Sight issue in the summer of 2013 and accept
7 that you had more of a significant role than is
8 reflected in your evidence so far?

9 **A.** So I did have a role with Second Sight, yes. I don't
10 believe I collected any information for them because
11 I wasn't an expert in that field. So my role was much
12 more almost -- and, again, it's the "facilitating"
13 word -- my role was much more facilitating Second Sight,
14 helping them get what they needed to get and then, when
15 meetings were coming up, laying out what was needed to
16 happen. And, yes, here I'm obviously -- I am saying to
17 Paula "These are the areas for the meeting with James".

18 **Q.** Are you providing advice to the Chief Executive as to
19 how best to respond to the Second Sight Report?

20 **A.** I don't think -- no, I don't think I am. I think the
21 Chief Executive would have made her own decision as to
22 how to respond to the Second Sight Report.

23 **Q.** She may make her own decision but are you providing her
24 with advice?

25 **A.** I'm saying that there are areas for positive noises for

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1 that relates to the remote access issue, which I'll
2 return to shortly.

3 So Mr Baker has raised the issue of bugs in Horizon,
4 James Arbuthnot at this stage, so we're now 24 June
5 2013, and Lord Arbuthnot isn't aware that the Post
6 Office accepts that there are bugs in the system. Do
7 you agree with that?

8 **A.** So is this email before or after the one that we talked
9 about earlier?

10 **Q.** Could we scroll down, please. We're going in order, in
11 date order, so --

12 **SIR WYN WILLIAMS:** It is after.

13 **A.** So it's after. In that email, we've already said that
14 the brief for the James Arbuthnot meeting, I've already
15 raised the fact that there's nothing about bugs in that
16 brief and shouldn't there be.

17 **MR BLAKE:** Yes, so that was 23 May.

18 **A.** Right, okay.

19 **Q.** We're now 24 June, so we're a month later, Second Sight
20 are concerned that James Arbuthnot still is of the
21 opinion that there are no bugs in Horizon; do you recall
22 this email?

23 **A.** I don't recall this email and, given the email earlier,
24 I would have thought that James Arbuthnot would have
25 known.

1 Q. Who would have told him?
2 A. Well, it was a brief for Paula, wasn't it? Paula was
3 going to see James Arbuthnot and I thought that what we
4 said was that we would change the subpostmaster --
5 sorry, we would change the Post Office "There are no
6 bugs in Horizon" to "There are bugs in Horizon which",
7 et cetera, et cetera.
8 Q. Is your evidence today that that would have been
9 communicated to James Arbuthnot in May 2013, when you
10 sent that email?
11 A. Well, I have no evidence as to whether that happened.
12 But that's what I thought the email we were discussing
13 earlier was suggesting.
14 Q. Would it have been of concern to you if it hadn't been
15 raised with James Arbuthnot in May 2013?
16 A. Yes, because I think that's what I'm trying to say in
17 that email. I, you know, I wanted it to be raised with
18 him, and I also, if it was true, wanted the prosecution
19 piece to be raised with him.
20 Q. Because of its significant impact?
21 A. Absolutely.
22 SIR WYN WILLIAMS: Just as a matter of timeline, because, as
23 you will have appreciated, I think, I'm quite interested
24 in the points that we've just been discussing, in that
25 May email of the 23rd, you suggest it wouldn't be
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1 been discussed in court and [the Post Office] still won
2 the case."
3 So just to remind ourselves, we have the local
4 suspense account problem, that's the 14 branch issue,
5 said by Second Sight to have occurred from 2011.
6 A. Okay.
7 Q. We have the 64 issue, the receipts and payments mismatch
8 issue: 64 branches, said by Second Sight to have been
9 discovered in September 2010.
10 We have here reference by Mr Jenkins to the Seema
11 Misra case which was October 2010 and he is accepting
12 that -- well, he is highlighting there that there was
13 reference to a third bug in that case, the Callendar
14 Square bug. Do you recall that issue?
15 A. So, I only recall it having now read this email and
16 having listened to some of the Inquiry.
17 Q. If we scroll up, we can see Mark Davies responding to
18 this. Lesley Sewell has forwarded it to you, Martin
19 Edwards and Mark Davies. Mark Davies said:
20 "This is massively important.
21 "Is there also a possibility that all incidents --
22 14 and 64 -- have been referenced in court?"
23 Then if we scroll up, we have a response from you.
24 You say:
25 "I would have thought the 14 is unlikely as it is
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1 appropriate to tell Lord Arbuthnot about it in
2 a telephone call which was occurring that day but you
3 anticipate, in effect, that it will be told to him in
4 a face-to-face meeting. So the question becomes: was
5 there a meeting between Lord Arbuthnot and anybody in
6 the Post Office, but presumably Paula Vennells, between
7 23 May and 24 June?
8 A. I haven't got that evidence. I don't know.
9 SIR WYN WILLIAMS: Right. Fine.
10 MR BLAKE: Can we please turn to POL00371710. We're on
11 28 June now, if we could turn to the second page,
12 please. The bottom of the first page, top of second
13 page. It's an email from Gareth Jenkins to Lesley
14 Sewell and the subject is "My witness statement for the
15 MISRA case". It says:
16 "Lesley,
17 "Attached is my final Witness Statement for the
18 Misra case. This was heard in Guildford Crown Court in
19 October 2010 and concerned West Byfleet Post Office.
20 "Page 14 covers my response to a problem that had
21 been identified in an earlier case (that involving Lee
22 Castleton who took [the Post Office] to court for unfair
23 dismissal which he lost).
24 "Do you need me to dig out anything more on this?
25 I think the key point is that Horizon did have bugs has
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1 too recent. Hugh can we check, or is it quicker to ask
2 Gareth Lesley.
3 "I will certainly be sharing this with Janet on
4 Monday."
5 Then Lesley Sewell said:
6 "Will ask ..."
7 I think that's Fujitsu?
8 A. Yes.
9 Q. Were you concerned at this stage about whether there
10 were additional bugs, which might call into question the
11 evidence that Mr Jenkins gave in the Misra case or in
12 other cases?
13 A. So I'd had no knowledge of more bugs. I just knew the
14 three bugs that were being talked about.
15 Q. Yes. So we knew the two that went to Second Sight, and
16 then we have here the reference to the third, the
17 Callendar Square bug --
18 A. Yes, yes.
19 Q. -- being referred to by Gareth Jenkins. Did that not
20 raise your concerns about the reliability of the Horizon
21 system?
22 A. So we had been provided with -- and I think there was
23 a document somewhere, which is a brief for Paula, which
24 went through what happened, the risk, how it was put
25 right, et cetera, et cetera, and I think I knew --
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1 that's what knew at this point.

2 **Q.** But you're receiving in June 2013 an email from Gareth
3 Jenkins attaching a statement from a criminal case in
4 which he made reference to the Callendar Square bug,
5 presumably that was relatively new news to you, the
6 Callendar Square bug?

7 **A.** Well, I'm getting the timeline is quite difficult,
8 because I don't know -- because there were three cases
9 in the Second Sight Report, there were two and then the
10 other one was mentioned --

11 **Q.** Yes.

12 **A.** -- and I don't know at which point they became clear to
13 us, and I think this document that was done for Paula --
14 and I don't know what brief that was for -- had all
15 three in them. So if it was in there and it was before
16 this, then I would have known about them.

17 **Q.** So around 28 June, you were aware of three bugs, one of
18 which as we've seen, Gareth Jenkins gave evidence
19 relating to in the Misra case?

20 **A.** I believe so.

21 **Q.** So were you and those around you concerned at this time
22 about the potential implications of that?

23 **A.** Of there being three bugs?

24 **Q.** Yes, and of Mr Jenkins having provided evidence in
25 criminal proceedings?

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1 [Horizon Online]].

2 "The Falkirk bug was first raised in the Castleton
3 civil case and was then picked up on for a number of
4 subsequent criminal cases even though it was irrelevant
5 to those environments. Defence experts were using it as
6 an example that Horizon has had bugs."

7 If we scroll up, you respond and you say as follows,
8 you say:

9 "The question was really about whether the defect
10 had been spoken about in open court other than in the
11 Misra case as it helps that it was in the public domain
12 and not 'covered up' in any way."

13 Mr Jenkins responds to you and he says as follows:

14 "Alwen,
15 "I understand the bug was spoken about in the
16 Castleton case (I wasn't personally involved). It was
17 definitely spoken about in the Misra case where it was
18 interrogated about [its] length. Other cases where it
19 was mentioned were settled out of court as far as
20 I know."

21 Isn't the penny beginning to drop now, with the
22 reference to cases being settled out of court that have
23 raised that particular bug?

24 **A.** No, not -- no because I think cases were settled out of
25 court.

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1 **A.** So --

2 **Q.** You can take those two separately.

3 **A.** Okay.

4 **Q.** So first the bugs.

5 **A.** So the bugs, I went from believing there were no bugs to
6 believing there were -- being given evidence there were
7 these three bugs and that they had been dealt with and
8 I was given some comfort that they'd been dealt with
9 properly. So I didn't know that there were any more
10 bugs and I would have expected Lesley, or whoever, to
11 have told us if there were or if there was the potential
12 of more.

13 **Q.** Could we please turn to POL00031352. If we start on
14 page 3, please. This is the same day, 28 June.
15 An email from Simon Baker on page 3, please, the bottom
16 of the page. He emails Gareth Jenkins, you're copied in
17 directly to that email to Gareth Jenkins. He says:

18 "Gareth
19 "You mention discussing the Falkirk bug in the Misra
20 case today, are there any other examples where bugs have
21 been discussed in court."
22 If we scroll up, please, he says:
23 "Simon,
24 "I'm not aware of any other specific bugs being
25 discussed in court (either related to Horizon or

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1 **Q.** Why might they have been settled out of court?

2 **A.** I don't have any information about why cases were
3 settled out of court, I just knew that some cases were
4 settled out of court.

5 **Q.** Did that cause you to think about whether, in fact,
6 there might have been something in their allegations?

7 **A.** I'm sure there were lots of different reasons why they
8 were settled out of court. I didn't have that
9 information, so ...

10 **Q.** Did you ask anybody for that information?

11 **A.** No, I didn't.

12 **Q.** If we scroll up, we have another response, you say:

13 "Thanks Gareth. Can we get the witness statement
14 for Castleton please Hugh. Thanks, Alwen."
15 Then Hugh says:
16 "Jarnail -- can you get Castleton case details
17 please [as soon as possible] as Alwen has asked for."
18 Then we have a response from Jarnail Singh. I'll
19 read to you just some extracts from the response. He
20 begins by saying:
21 "In criminal trials both the prosecution and defence
22 put their case to the jury. Who make a decision 'beyond
23 all reasonable doubt' on finding it the defendant
24 guilty, jury do not give reasons for their verdict and
25 it is not possible to ask the jury the basis and details

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1 upon which they made their decision. On occasion
 2 particular point can be inferred."
 3 Did you understand what's meant there?
 4 **A.** Yes, I think so.
 5 **Q.** What did you understand by that?
 6 **A.** Just that you -- so I understand what he's saying is
 7 that we can't get a reason why a case that a jury sees
 8 gives their decision.
 9 **Q.** He says:
 10 "This is the only criminal trial where a jury has
 11 been required to consider in detail the integrity of the
 12 Horizon system."
 13 He summarises Seema Misra was a subpostmistress at
 14 West Byfleet. He says about halfway down the second
 15 paragraph, he says:
 16 "The jury's verdict showed that it was sure that
 17 computer error played no role in the case. There has
 18 been no appeal against conviction."
 19 He says:
 20 "We instructed our own expert, Gareth Jenkins, from
 21 Fujitsu. This was a turning point in the case."
 22 About halfway thorough paragraph 4 he says:
 23 "In a nutshell his final conclusion was this: he
 24 hadn't found any problem but there still might have been
 25 a problem that he and Jenkins [this is talking about the
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1 is clear and can be communicated.
 2 "Mark is putting in place external comms ...
 3 "We have a call with [Second Sight] this afternoon
 4 ..."
 5 It's the fourth paragraph I'd like to just read to
 6 you:
 7 "I am going to spend time with Janet [Janet Walker,
 8 James Arbuthnot's Chief of Staff] at 9.00 on Monday
 9 morning, she says she can give me as long as it takes.
 10 My approach will be to try to get to understand the
 11 status of the review and the risk to James and us of
 12 an incomplete Interim Report. I will share the fact
 13 that [Second Sight] are not using all the evidence they
 14 are being given and are our concerns is that their
 15 approach to try and keep everyone happy is not how we
 16 would expect a forensic accountant to behave. I do
 17 think this is the right place to share the 'bugs' we
 18 have found and how we have dealt with them, which is why
 19 the report from Rod/Lesley checked by Legal and Mark is
 20 important. My objective is to get Janet to a place
 21 where she also wants the meeting to be cancelled. I am
 22 also going to mention the timing of the report aligned
 23 with the funding and James' unhelpful comment to Jo
 24 about 'unfair convictions'. I will have to play this
 25 meeting a bit by ear!"
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1 defence expert] might have missed. The jury clearly
 2 rejected this as wishful thinking after considering all
 3 of the evidence in the case."
 4 He says at 5, about halfway down:
 5 "It provides a rigorous analysis that is woefully
 6 absent from the vague and illogical complaints about
 7 Horizon that are reported in some sections of the media.
 8 The judgment referred briefly to a real computer problem
 9 that had emerged at the Callendar Square office in
 10 Falkirk. Gareth Jenkins to investigate this problem.
 11 He provided a detailed summary of the problem in his
 12 witness statement ... He also explained in that
 13 statement why he concluded that it was irrelevant to
 14 Mrs Misra's case."
 15 Were you satisfied by the explanation that was
 16 provided by Mr Singh?
 17 **A.** Well, he was -- yes, he was the expert. He was, you
 18 know, he was -- I'm not a lawyer. He was the lawyer.
 19 He was the expert, so, yes, I was satisfied.
 20 **Q.** Can we please turn to POL00144909. The second page,
 21 please. We're now at 28 June 2013 and you email Paula
 22 Vennells "Next steps on Horizon issues -- update":
 23 "Paula
 24 "Rod Ismay and Lesley working the detail of the 2
 25 bugs, to understand them and get them into language that
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1 The comment there, "I do think this is the right
 2 place to share the bugs we have found and how we have
 3 dealt with them", your evidence to the Chair earlier was
 4 that you thought that that had already been dealt with
 5 by Paula Vennells after the meeting in May.
 6 It certainly reads here as though you are, in fact,
 7 going to be the bearer of that bad news; is that right?
 8 **A.** So certainly it sounds -- I've said I will tell them how
 9 we've dealt with them. So it could -- it could well be
 10 that I had not remembered this and that this is the
 11 first time that we've talked about bugs. It could also
 12 be that Paula had shared it and I'm just sharing the
 13 detail of the bugs but, reading this now, I think I was
 14 expected to share the detail about the bugs.
 15 **Q.** Why is it that the Company Secretary is fulfilling the
 16 role of communicating that important shift in the Post
 17 Office's position?
 18 **A.** So I was seeing Janet because she and I had had a good
 19 relationship from the first meeting with Alice and, if
 20 Janet had any issues, she would contact me and I would
 21 try and help sort out any things for her that were for
 22 James. You would have to ask others why I was expected
 23 to do this.
 24 **Q.** Which others?
 25 **A.** Well, you'd have to ask Paula because I would have
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1 thought Paula would have wanted to speak to James.
 2 **Q.** You say, "I do think this is the right place to share
 3 the bugs"?
 4 **A.** Because it looks as if we haven't shared them yet.
 5 **Q.** Yes.
 6 **A.** So I'm going, "Look, we have to share this information
 7 about bugs and I'm seeing Janet".
 8 **Q.** You had a good relationship with Janet Walker --
 9 **A.** Yes.
 10 **Q.** -- and it was your advice that now was the time to share
 11 that information, not with James Arbuthnot himself, but
 12 with the person who you had a good relationship with?
 13 **A.** Well, I don't think I was under any misillusion that if
 14 I shared it with Janet it wouldn't be shared with James,
 15 you know, I --
 16 **Q.** Were you being used as the bearer of bad news by the
 17 company?
 18 **A.** Possibly. But it's me suggesting I do this. It's me
 19 saying I do think we need to share this with Janet and,
 20 therefore, James before the Second Sight Report comes
 21 out.
 22 **Q.** We started today looking at the expert report and the
 23 role of the company secretary?
 24 **A.** Yes.
 25 **Q.** Where in the role of the company secretary does this
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1 **A.** Yes, yes.
 2 **Q.** -- to the Chair. This not communicating anything to the
 3 Board. In fact, it's the very opposite, isn't it? It's
 4 communicating something to an external party?
 5 **A.** Yes.
 6 **Q.** Why is the Company Secretary doing that?
 7 **A.** Because I had the meeting with Janet and I didn't want
 8 to go to that meeting and not tell her about the bugs
 9 that I now knew about.
 10 **Q.** Why were you attending a meeting with Janet?
 11 **A.** So I was attending a meeting with Janet because I -- it
 12 was my -- I had the connection with Janet and I was
 13 attending this meeting with Janet in advance of the
 14 Second Sight Interim Report, and it was to -- and I'm
 15 going from memory here -- but I believe this meeting was
 16 to understand how both James and the Post Office and
 17 Second Sight were going to align the following week and
 18 understand how this report was going to come out and how
 19 we were going to deal with it.
 20 **Q.** Was it a strategic choice to break the news to
 21 a friendly face, to somebody not as senior as James
 22 Arbuthnot, somebody who assists him; not directly from
 23 the Chief Executive to the Parliamentary but from you
 24 to his assistant?
 25 **A.** I don't believe that's a choice that I made. I believe
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1 kind of a role come in?
 2 **A.** Well, it doesn't.
 3 **Q.** Why were you doing it?
 4 **A.** Because, in this instance, I was trying to get the
 5 information about bugs out to Janet and, therefore, to
 6 James, and, if no one else was seeing them before the
 7 Second Sight Report, then I needed to do that.
 8 **Q.** I mean, we've seen email after email about bugs, direct
 9 liaison with Gareth Jenkins by this stage, you are
 10 meeting up with the assistant to the key
 11 Parliamentary?
 12 **A.** Mm-hm.
 13 **Q.** Why, as I say, is the Company Secretary being tasked
 14 with all of this or, even if you're not being tasked,
 15 why is the Company Secretary doing this work?
 16 **A.** So I've explained that, originally, the connection with
 17 James and with Alice was through James, and that's how
 18 I had a relationship with Janet. We've also seen emails
 19 where Alice is saying that, you know, I needed to be
 20 involved in things and needed to feed back things to
 21 Alice when things arose.
 22 **Q.** Feeding back to Alice absolutely would fall under that
 23 job description that we looked at --
 24 **A.** Yes, yes, yes.
 25 **Q.** -- the role to communicate --
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1 I got to this point and I was saying "At the meeting on
 2 Monday, I think I have to share what we know about
 3 bugs". I wasn't willing to go to this meeting and see
 4 Janet and talk about how we move towards a Second Sight
 5 review without talking to her about bugs.
 6 **Q.** "My objective is to get Janet to a place where she also
 7 wants the meeting to be cancelled."
 8 **A.** So I'm -- I believe that is the meeting that James has
 9 got with Second Sight --
 10 **Q.** Yes.
 11 **A.** -- and the reason for that is that this was now -- it
 12 wasn't the Interim Report we had here; it was
 13 an incomplete report. And you can see from above that
 14 Second Sight hadn't used all the evidence, there were
 15 gaps in the report and the reason I'm saying that
 16 James -- there is a risk with James having this meeting
 17 with Second Sight is because the Second Sight Report at
 18 this point is not accurate, it's incomplete.
 19 **Q.** Isn't this a highly strategic move that you are advising
 20 on here: when to tell the Parliamentary, the objective
 21 to get the subsequent meeting with Second Sight
 22 cancelled; that's well beyond your role as Company
 23 Secretary, isn't it?
 24 **A.** Absolutely, and it's beyond -- we -- I could not tell
 25 Janet that the meeting needed to be cancelled. I needed
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1 to explain to Janet that this was an incomplete Interim
 2 Report, that not all the facts were in it, that there
 3 was evidence lacking and, if James went ahead with his
 4 meeting with Second Sight, there was risk that he would
 5 be -- that he would be misinformed. That's all I'm
 6 doing here and then it would be for Janet and James to
 7 decide whether the meeting should be cancelled.
 8 I didn't want them to go ahead not knowing that the
 9 report was incomplete.
 10 **Q.** I'm just going to take you to two very brief documents
 11 before we break for lunch. Could we just turn to
 12 POL00296821. If we turn over to page 2, this is
 13 an email from Andrew Parsons to Rodric Williams
 14 providing detail about a particular bug.
 15 "Mrs Wall was terminated in September 2011. The
 16 first '14 Bug' error in her branch occurred after she
 17 was terminated", et cetera.
 18 So it was relating to what was at that time referred
 19 to as the "14 Bug".
 20 Could we group please, Hugh Flemington says,
 21 "Useful". Then Mark Davies says:
 22 "Can we change the way we are referring to this
 23 please as a matter of urgency?"
 24 If we look above, we have a request from you to Mark
 25 Davies, Hugh Flemington and Lesley Sewell:
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1 at that stage, Paula Vennells seeking a non-emotive word
 2 for bugs?
 3 **A.** No, I don't, I just -- I just know that we stopped
 4 calling bugs "bugs".
 5 **Q.** One final document before we break, POL0029638. This is
 6 within a day of that email. If we turn to page 2,
 7 please. We have Gareth Jenkins emailing Simon Baker:
 8 "Simon ..."
 9 It was about the Callendar Square bug.
 10 "It was first raised in 2005."
 11 If we scroll down, it says, halfway down that
 12 paragraph:
 13 "The problem in business terms was that due to
 14 transactions not being visible, [subpostmasters]
 15 considered that they had not been input and so re-input
 16 the transactions, thus ending up with duplicate
 17 transactions and so when the originals came through the
 18 following day, the accounts would be in a mess."
 19 The bottom paragraph:
 20 "This problem was evidenced by a large number of
 21 events in the event logs."
 22 If we scroll up, please. Simon Baker forwards it to
 23 you, Susan Crichton, and Hugh Flemington. If we scroll
 24 up we have an email from you to Lesley Sewell and Susan
 25 Crichton:
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1 "Can we call bugs incidents from now on please."
 2 That is the same day as the email that we have just
 3 been looking at. Why are you, on that day, seeking to
 4 rename bugs.
 5 **A.** Well, you can see from the email before that I'm calling
 6 them bugs and I have no problem with that. Mark Davies,
 7 who is the Communications Director, comes out and says
 8 "Can we call them something else, please", and that's me
 9 going out to everybody on that email and saying, "Can we
 10 call bugs incidents from now on, please".
 11 **Q.** Was that in your role as Company Secretary or is that in
 12 some other role?
 13 **A.** That's just me cascading Mark Davies' email.
 14 **Q.** If we turn, please, to POL00380985. Within a matter of
 15 days we have the email that the Inquiry has already
 16 seen, 2 July. Paula Vennells seeking an answer to the
 17 question:
 18 "What is a non-emotive word for computer bugs,
 19 glitches, defects that happen as a matter of course?"
 20 "Answer:
 21 "Exception or anomaly' ..."
 22 Who set that particular question, do you recall?
 23 **A.** No idea.
 24 **Q.** If we scroll above, we have the full distribution list,
 25 so you were on that distribution list. Do you remember,
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1 "Is this another anomaly it does worry me that the
 2 number seems to be going up."
 3 So the very next day you are then referring to
 4 a bug, the Callendar Square bug, as an anomaly. Do you
 5 recall using the corporate dictionary?
 6 **A.** I don't but if I had sent the email asking other people
 7 to use that word, I would probably start using that
 8 word.
 9 **Q.** Did you give any thought to why you were now calling
 10 bugs "anomalies"?
 11 **A.** In my mind, it didn't really make any difference what we
 12 called them but I'd been asked to call them this, so
 13 I called them it.
 14 **MR BLAKE:** Thank you, sir. That is an appropriate time for
 15 lunch. Could we come back at 2.00, please. Thank you.
 16 **SIR WYN WILLIAMS:** Sorry, yes. I was mute. Yeah, 2.00.
 17 **MR BLAKE:** Thank you very much.
 18 (1.04 pm)
 19 (The Short Adjournment)
 20 (2.00 pm)
 21 **MR BLAKE:** Good afternoon, sir, can you see and hear me?
 22 **SIR WYN WILLIAMS:** Yes, thank you.
 23 **MR BLAKE:** Can we please turn to POL00029641.
 24 We're at 3 July 2013. So the same day, in fact the
 25 evening, of the email that I took you to before lunch.
 120

1 If we scroll down, please. There's an email from Rodric
2 Williams to Rod Ismay and Lesley Sewell and it's about
3 the local suspense problem. I think -- yes, you're not
4 in this chain, are you? He says as follows, he says:
5 "All -- here's my summary of my call with Andy Winn
6 ..."

7 I think it's information about the 14 branch issue:
8 "The issue first surfaced at the Post Office Finance
9 Service Centre on 6 February 2012, at the close of
10 a Branch Trading period ...

11 "FSC might have proactively contacted the
12 [subpostmistress or subpostmaster] given the size of the
13 discrepancy.

14 "FSC investigated, saw that it looked wrong, and
15 brought the account back to balance ... at no cost to
16 the [subpostmaster]."

17 It says there:

18 "Over the next few weeks, as the rest of the branch
19 trading data for the same period was processed, the
20 other 13 branch anomalies were noted.

21 "Those other branches' accounts were brought to
22 balance, again at no cost to the subpostmaster.

23 "This was not perceived to be a significant issue
24 given the small number of branches affected and the
25 small sums involved."

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1 information about this bug.
2 **Q.** Could we turn, please, to POL00027825. Still on 3 July,
3 same day. There's an email from Paula Vennells, second
4 email. She says:
5 "Ignore the note below. Just getting mixed up with
6 mails: I'm sure there are plenty of good reasons but let
7 me ask anyway: could our two documents be shared with
8 [James Arbuthnot]? They are so clear -- it might help
9 his understanding."

10 Do you recall what those two document were at all?

11 **A.** I don't. Does it make it any clearer further down the
12 email?

13 **Q.** Well, it's no the clearer because that email says,
14 "Ignore the note below", so it may not be.

15 **A.** Oh, no.

16 **Q.** There's a response from you above, and you say as
17 follows:

18 "I think it's risky. It would depend on how open he
19 is with us, if he listens and whether we believe we have
20 convinced him to amend his approach to media, MPs, etc."

21 **A.** So I don't remember this email and I don't know which
22 two documents Paula is alluding to. It could be our
23 media brief, I don't know.

24 **Q.** So to continue a theme that we were discussing for most
25 of the morning, this is again you being really part of

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1 Then it says:

2 "On 6 February 2013, the Willen [subpostmaster]
3 contacted [the Post Office] National Business Support
4 Centre to report the same discrepancy in his Branch
5 Trading as the previous year."

6 So were you aware that this particular problem was,
7 first of all, reported to the Post Office back in 2012,
8 that it, although they thought they had addressed it,
9 appeared again in February 2013?

10 **A.** So I was aware of this as a bug. So I don't know how
11 much detail I had on it. It would have been in one of
12 the reports I got about the bugs.

13 **Q.** Not just a bug but a bug that lasted from 2012 on to
14 2013. If we scroll over the page, it was passed to
15 Fujitsu between 6 and 8 February 2013 and was resolved
16 in April 2013. So were you aware that the 14 branch
17 issue or anomaly was an issue that lasted for well over
18 a year and which was known to the Post Office at the
19 time?

20 **A.** So I think in one of those documents it does explain how
21 it happened, and I think it's triggered by the date. So
22 it comes -- so it happens a year later, if you see what
23 I'm saying.

24 **Q.** Yes.

25 **A.** So I was aware of this bug and I think I had had

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1 that inner circle, advising Paula Vennells not on
2 whether a matter should go to the Board but should go to
3 James Arbuthnot.

4 **A.** So I think in the run-up to meeting James Arbuthnot,
5 yes, I was involved in that. Because I was the one
6 meeting Janet and I was the one doing lots of the input
7 into James.

8 **Q.** Again, same question as I was asking this morning: what
9 part of the job of a company secretary was that?

10 **A.** Well, it isn't the part of a traditional company
11 secretary role; it's a role that seemed to have evolved
12 because I got involved with Alice in the initial meeting
13 with James Arbuthnot.

14 **Q.** Thank you. We're now quite a way -- I mean, we started
15 looking at emails from 2012 --

16 **A.** Yes.

17 **Q.** -- so this is a year on. Could we please turn to
18 POL00192017. We're now on 8 July. If we have a look
19 down the first page, we can see there, at the bottom of
20 the page, please, Sarah Paddison on behalf of Paula
21 Vennells, on 8 July:

22 "As promised in my previous email, here is a copy of
23 the final draft of the [Second Sight] Report ... They
24 took on board the majority of our comments over the
25 weekend, but not all of them. The second attachment is

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1 an internal note detailing the remaining aspects of the
2 report which we believe are misleading or factually
3 inaccurate."

4 Would you have read the Second Sight Report at that
5 point?

6 **A.** I think at this point I would have just sent the two
7 things that Paula's asking me to the Board but I do
8 believe I read the Second Sight Report.

9 **Q.** Approximately around this time?

10 **A.** I can't be sure but I would have imagined I would have
11 done.

12 **Q.** Where there is a report that is relevant to the legal
13 and regulatory obligations of the company, would you
14 generally have read that substantive report?

15 **A.** Yes.

16 **Q.** If we scroll up we see you then forward it to the
17 "Horizon reading room". Can you assist us with what
18 that is?

19 **A.** So the Board had a reading room, so this could well be
20 a folder within the Board's reading room.

21 **Q.** How would you decide whether it was something to go to
22 the Board or not to go to the Board?

23 **A.** So here you can see that I'm being told to send it to
24 the Board.

25 **Q.** Yes.

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1 "I spoke with Alice this morning: as I [explained]
2 (and rightly) Alwen and I need to give an oral update to
3 the Board tonight and she would like a paper tabled and
4 discussed next week at the Board meeting."

5 Could we scroll up, please. Susan Crichton says:

6 "We are working [through] this and will have
7 thoughts later today which can feed in."

8 Paula Vennells says:

9 "... do you mean everyone is [or are there] multiple
10 angles? If so, that's great, when would be a good time
11 for a call?"

12 Susan Crichton responds:

13 "Alwen Hugh and I it was Lesley as well but she has
14 gone to the House of Parliament to help brief Jo S --
15 also Angela is around so will try and get her to help."

16 So we saw the first email from Mark Davies. Was it,
17 in your view, appropriate for Mark Davies, the Head of
18 Communications, to have been providing the kind of
19 thoughts that we've seen at the end of this chain?

20 **A.** Can we go back down?

21 **Q.** Yes, absolutely. If we scroll down. What was your view
22 of the role of Mark Davies at this particular time, in
23 the response to the Second Sight Report?

24 **A.** My understanding would be that Mark would be pulling
25 together the PR response and all the Communications

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1 **A.** So it would have got sent to the Board. If something --
2 if I wasn't sure, I would ask the Chair.

3 **Q.** Could we please turn to POL00099149, please. Thank you.
4 Over the page, actually, the second page, we have
5 an email that the Inquiry has already seen from Mark
6 Davies to Paula Vennells. You're also an addressee and
7 he provides some thoughts on the next steps following
8 the publication of the Second Sight Report and proposes
9 various initiatives. If we scroll up, please, to
10 page 1, we have a response from Paula Vennells. She
11 says:

12 "Mark, thank you for this.

13 "All, if you could do something similar -- half
14 a dozen points on what you think we need to do next,
15 re your own areas and overall. It will help define next
16 steps. See below.

17 "Susan, re point one below -- do you have
18 a proposal/something in writing as to what the next
19 legal steps are, or is this referring to the general
20 conversation last week re the external lawyers code of
21 disclosure?"

22 Do you recall an issue with the Code of Disclosure
23 at this point?

24 **A.** No.

25 **Q.** No. It then says:

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1 response.

2 **Q.** There we see some substantive suggestions about the way
3 forward, such as:

4 "[Second Sight] will have to be involved: they have
5 to position themselves with the MPs as crucial
6 independent voice.

7 "We need to find ways of supporting them in areas
8 where they do not have expertise ...

9 "That support needs to look with them at all cases
10 brought by MPs", et cetera.

11 **A.** Mm.

12 **Q.** Did you have a view at that stage about whether it was
13 or wasn't appropriate for the Head of Communications to
14 be inputting in that way?

15 **A.** I know that Mark had a lot of contact with MPs and
16 I think that was maybe part of his role, as well, so
17 maybe that's why he's picked up the MP piece. I think
18 he's just sending some thoughts and saying, you know,
19 "These are my thoughts, what do you think?"

20 **Q.** If we scroll up we have, in the first email, a meeting
21 with you -- at the very top of the page, please -- you,
22 Hugh, and Susan Crichton. What do you recall of those
23 conversations?

24 **A.** So I don't recall those conversations. I would imagine
25 that, if Alice has asked for a call and Paula wants to

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1 give her a verbal update that evening and she wants
 2 a Board paper, I'm seeing my job here as coordinating
 3 that verbal update and then the Board paper.
 4 **Q.** If we scroll down, the reference to the update to the
 5 Board, it says:
 6 "... update to the Board tonight ..."
 7 Sorry, if we scroll down to the bottom of that page,
 8 there:
 9 "... I need to give an oral update to the Board
 10 tonight and she would like a paper tabled ..."
 11 Do you recall there being a conversation with the
 12 Board that night?
 13 **A.** I don't but, if Alice has asked for it, it probably
 14 happened.
 15 **Q.** If we turn to POL00027573, these are some minutes of
 16 a Board meeting on that day. You've referred to this in
 17 your witness statement. It addresses an entirely
 18 different topic. It's the 2013/2020 strategic call.
 19 **A.** Oh right, yes.
 20 **Q.** If we scroll down, we can see. So that's a conference
 21 call held on 9 July and we can scroll down it, there's
 22 no mention -- and you've said in your statement -- there
 23 of any Horizon related issues?
 24 **A.** No.
 25 **Q.** Would that have been the moment to have raised those
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1 "Simon is preparing a further advice about Gareth
 2 Jenkins as agreed. However he touched on the [Gareth
 3 Jenkins] point in his earlier advice on the 8th."
 4 You're not copied into this correspondence. Were
 5 you aware, at this time, of concerns within the Post
 6 Office about the reliability of Gareth Jenkins?
 7 **A.** No.
 8 **Q.** Can we please turn to POL00145427. If we scroll down,
 9 please, this is the next day, 12 July. So the bottom of
 10 page 1, into page 2. We have an email there, Susan
 11 Crichton to you, subject is "Board Paper for
 12 circulation":
 13 "Alwen -- if you can bear to read it quickly
 14 [please] do as I am tired ... of it!"
 15 If we scroll up, please, the response from you:
 16 "Sorry I know you don't want to but I have change
 17 the recommendation and a few bits are you happy."
 18 We will come to look at the changes that are made.
 19 Then this is the response from Susan Crichton, which
 20 I took her to in her evidence, where she says:
 21 "Hi you must have read my mind whilst I was walking
 22 the dog I suddenly thought it wasn't a good idea to
 23 mention 'bugs' so have changed that and also found
 24 another couple of typos -- the recommendation is much
 25 better."
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1 issues or was that a separate call?
 2 **A.** So I think -- no, this is a completely separate call,
 3 and I think this would have been earlier in the day.
 4 **Q.** Thank you. Do you think it's likely or unlikely that,
 5 if there was a call later that day, there would be
 6 minutes of that call?
 7 **A.** I think it's likely there would be a note of the call,
 8 not necessarily minutes, unless it was -- it was
 9 convened as a Board meeting.
 10 **Q.** Who would have taken the note of the call?
 11 **A.** It would likely to be me.
 12 **Q.** Thank you. Could we please now turn to POL00297607.
 13 We're moving on now to 11 July. If we could scroll
 14 down, please. So this is 10 July, and the top one is
 15 11 July, and this is an email that relates to Gareth
 16 Jenkins and Rodric Williams is saying here to the
 17 external lawyers at Cartwright King, copying in Susan
 18 Crichton and others:
 19 "Do you have some suggested wording for how we break
 20 the [and we think that's 'Gareth Jenkins'] news to
 21 [Fujitsu], including why it is a problem for you from
 22 a criminal law perspective?"
 23 If we scroll up, please, on the 11th, it's an email
 24 from Martin Smith at Cartwright King to Rodric Williams,
 25 Susan Crichton copied in:
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1 So we saw there that the day before, and the day
 2 before that, there's that chain of emails relating to
 3 the Gareth Jenkins issue.
 4 **A.** Yes.
 5 **Q.** You are in contact with Susan Crichton, who was involved
 6 in the Gareth Jenkins issue. Did Susan Crichton, at
 7 this point where you are discussing a Board paper for
 8 circulation, mention concerns about the reliability of
 9 Gareth Jenkins?
 10 **A.** No, I do not remember ever seeing any concerns about
 11 Gareth Jenkins or the Clarke Advice, or at all.
 12 **Q.** Thank you. The paper that was sent to you is
 13 POL00145421. Perhaps if we turn to page 3 and if we
 14 could keep page 3 on screen, at the bottom of page 3,
 15 please, so the "Recommendations", and then could we
 16 please also bring up on screen your amended version, and
 17 that is POL00145426.
 18 Do you recall in that email chain you had told Susan
 19 Crichton that you had amended the "Recommendations"?
 20 **A.** Yes.
 21 **Q.** So this, on the right-hand side, is the original
 22 version. If we look on the left-hand side, if we could
 23 turn, please, to page 3 of that version, we can see
 24 there that the "Recommendations" is now changed. It was
 25 originally:
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1 "The Board is asked to:
 2 "Note the update and action set out above;
 3 "Consider whether the Post Office cease criminal
 4 prosecutions;
 5 "Request the Audit and Risk Committee to oversee the
 6 actions set out above."
 7 It's now changed to:
 8 "Note the update and actions set out above;
 9 "Decide whether the Audit and Risk Committee should
 10 consider the position of the Post Office as
 11 a Prosecuting Authority alongside its ... work in
 12 September ..."
 13 So that second recommendation, the explicit
 14 recommendation to consider whether the Post Office cease
 15 criminal prosecutions has been removed. Can you assist
 16 us with why that was removed?
 17 A. So the ones on the left, they are the ones that were --
 18 Q. That's the updated version that you returned to Susan
 19 Crichton on the left.
 20 A. Okay.
 21 Q. The right-hand side is the version you were sent by
 22 Susan Crichton originally.
 23 A. So I can't -- I only saw these two papers this morning.
 24 Q. Yes.
 25 A. I can't really help with why I suggested the ones on the
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1 my advice on how I thought that would land with the
 2 Board and whether I thought that was enough information
 3 or whether they needed to take information out but
 4 I don't specifically remember this one.
 5 Q. Do you have any recollection at this time of the Board's
 6 views on ceasing prosecutions?
 7 A. I don't, I'm sorry.
 8 Q. Could we please turn to POL00191966. This is the same
 9 day, 12 July. This isn't an email that went to you but
 10 this is just to assist us with the timeline of where we
 11 are. Rodric Williams is sending to Andrew Parsons,
 12 external lawyer, and a team of internal lawyers, the
 13 attached:
 14 "... which sets out the high level issue which
 15 Cartwright King (our criminal law solicitors) has
 16 identified with the Fujitsu evidence Gareth Jenkins has
 17 been providing in support of the criminal prosecution
 18 cases conducted for Post Office Limited. A more
 19 detailed note should arrive on Monday, which I will
 20 forward to you once I have it."
 21 So, again, we have there, that's the Gareth Jenkins
 22 advice that you referred to --
 23 A. Yes.
 24 Q. -- that you say you didn't know about --
 25 A. No.

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1 left and not the ones on the right.
 2 Q. The one on the left reflects the ultimate version that
 3 went to the Board.
 4 A. Okay.
 5 Q. Do you recall, in July 2013, discussions about whether
 6 the Post Office ceases criminal prosecutions?
 7 A. I don't. Is that in the main body of the report?
 8 Q. So that's 8.2, the "Recommendations".
 9 A. So I -- no, I can't remember.
 10 Q. Did you get involved -- I mean, is this a typical
 11 example of you getting involved in what recommendations
 12 were made to the Board; is this unusual; is this
 13 something we might see elsewhere or not?
 14 A. I can't really comment. I'm -- having only seen this
 15 this morning, I don't know why those two things change
 16 or why I thought the left one was a better update for
 17 the Board or a better part of the Board paper.
 18 Q. The question really was about whether that was something
 19 you would typically do, to amend recommendations to the
 20 Board or to --
 21 A. No.
 22 Q. No. So if you had made that change, would it have been
 23 an unusual change to have made?
 24 A. I think so, yes. I mean, not this particular paper but
 25 people did send me Board papers, you know, and ask for
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1 Q. -- at the time.
 2 We just had an email chain about discussing a paper
 3 for the Board. Is that a matter that you would have
 4 expected to have gone to the Board had you known about
 5 it?
 6 A. Absolutely.
 7 Q. Could we please turn to POL00099200.
 8 Same date, 12 July, you are there emailing Susan
 9 Crichton and Paula Vennells and you're providing them
 10 with a timeline. So this is events that are going to
 11 happen over the next week or so, I think; is that right?
 12 A. Yes.
 13 Q. Yes. So on 15 July:
 14 "... Decide who's going to lead going forward.
 15 "16th -- Paper and discussion with the Board.
 16 "16th -- meeting with [Second Sight] and External
 17 Lawyers ...
 18 "17th -- [you] to call AB ..."
 19 Is that Alan Bates?
 20 A. I assume so.
 21 Q. "... re toxic cases and set up a face-to-face to
 22 understand which cases he believes are in this category
 23 and a quick talk through, with [the Post Office] lead."
 24 Can you assist us with what "toxic cases" is
 25 a reference to?

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1 A. So I can't specifically but I think I was saying that
 2 I would call Alan Bates and talk about the specific
 3 cases that he thought needed to be discussed face to
 4 face as -- well, the Second Sight review -- so they
 5 hadn't done their Interim Report yet, have they, or had
 6 they? Sorry, I'm a bit --
 7 Q. Not yet.
 8 A. -- a bit confused by the timeline here.
 9 Q. Sorry, they have. Sorry, yes.
 10 A. They have?
 11 Q. Yes.
 12 A. Okay. So -- and I'm --
 13 Q. So we're still going chronologically.
 14 A. Okay. Okay.
 15 Q. There's been a discussion of the Board paper, which is
 16 entitled "Update following the publication of the
 17 report", and that's the discussion between you and Susan
 18 Crichton.
 19 A. Yes.
 20 Q. We have on the same day, an email from Rodric Williams
 21 circulated internally and to Mr Parsons about those
 22 Gareth Jenkins concerns. We're still on the same day,
 23 so after the report, and this is the timeline going
 24 forward.
 25 A. So I can't remember this and I'm reading it now and

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1 If we scroll up, Mr Smith from Cartwright King
 2 responds, you're copied in:
 3 "I have asked Simon to draft a response tomorrow
 4 morning."
 5 That's Simon Clarke from Cartwright King.
 6 Then the email above that from Mr Flemington sent to
 7 the others but copied in to you:
 8 "Thanks Martin
 9 "Presumably we need to give off the signals that we
 10 are proactive, doing all the right things [regarding]
 11 writing to people to keep the [Attorney General] and
 12 [Criminal Cases Review Commission] calm. Hopefully if
 13 they see that they may leave us to it for the moment."
 14 So this is, presumably, a very significant period of
 15 time in your career. You've received a letter that the
 16 Second Sight Report has been received, you've now
 17 received a letter from the Criminal Cases Review
 18 Commission. Do you agree with that, that it was quite
 19 a significant moment?
 20 A. So the problem I have here is I did not see the --
 21 I don't believe I saw the Clarke Advice.
 22 Q. Yes.
 23 A. And yet, clearly, people are responding -- the rest of
 24 these people on this email have seen the Clarke Advice
 25 and are responding about how they are -- how, because of

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1 thinking what would I have meant? I would imagine the
 2 contact with Alan Bates would be to find out which
 3 cases -- because we've looked at spot reviews, five spot
 4 reviews, from JFSA but we haven't looked at individual
 5 cases, although some were in the spot reviews. So
 6 I think this is me going to Alan Bates and saying,
 7 "Which are the other cases that we need to talk about
 8 and to bring into the next piece of work?"
 9 Q. Thank you. Looking at this timeline, on the 15th,
 10 that's, in fact, the day of Simon Clarke's substantive
 11 advice on Gareth Jenkins.
 12 A. Yes.
 13 Q. The very next day, there is a proposed paper and
 14 discussion with the board on Horizon issues.
 15 I'd like to turn now to POL00122552. I'm going to
 16 skip to the 15th, so that's the date to decide who's
 17 going to lead, going forward.
 18 If we scroll down over the page to page 2. This is
 19 the day of the Jenkins Advice. Susan Crichton is
 20 emailing Cartwright King lawyers, and you're copied into
 21 this. She says:
 22 "Martin -- we have received the attached from the
 23 Criminal Cases Review Commission should you draft reply
 24 on our behalf or should we refer them to you to reply on
 25 our behalf?"

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1 the cases, they're going to take them back to the CCRC
 2 and -- but I'm not a lawyer. I do not know what needs
 3 to go to the CCRC, so I'm not -- I haven't got the
 4 detail behind what's going on here.
 5 Q. But you have a board meeting the next day?
 6 A. Yes, and -- sorry.
 7 Q. Does that flag to you, the CCRC writing to you, that
 8 there might be some serious issues with cases that the
 9 Post Office has prosecuted?
 10 A. So I would not have the detail of that. Susan Crichton
 11 and the Legal Team would have the detail of that and my
 12 expectation would be, if there's something in there that
 13 the board needed to know about, the Board would be told
 14 the next day.
 15 Q. They would be told by Susan Crichton?
 16 A. Yes.
 17 Q. Yes. Could we please turn to POL00021516, and these are
 18 the Board minutes of 16 July 2013. We see there that
 19 you are in attendance, if we scroll down, please. The
 20 one person who is not in attendance at this Board
 21 meeting is Susan Crichton. Do you recall why Susan
 22 Crichton wasn't invited into that Board meeting?
 23 A. So was there a legal paper at this Board meeting?
 24 Q. Well, if it assists, her evidence was that she was kept
 25 out of the meeting.

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1 A. So is this that -- I do remember that meeting.
 2 Q. Yes.
 3 A. This is that meeting; yes?
 4 Q. This is that meeting.
 5 A. Okay. So I -- my practice was that I would go to the
 6 executive member who was coming to the Board to present
 7 and I would give them an approximate time when they
 8 needed them to be standing outside the door, basically.
 9 When the moment came for us to deal with their paper,
 10 I would stand up, go to the door, invite them in and
 11 they would come and present their paper and, at the end
 12 of their presentation, I would get up, take them to the
 13 door, and bring the next person in, if there was a next
 14 person.
 15 At this Board meeting -- and our boardroom had
 16 frosted glass, so you could see if there was someone
 17 outside. At this Board meeting, Susan was waiting
 18 outside to come in and, as we started the Board -- it's
 19 not the first issue, I don't think.
 20 Q. No, we could scroll down. Horizon update is page 6.
 21 A. Okay.
 22 Q. We had seen previous correspondence that identified
 23 Susan Crichton as the relevant person to speak to that
 24 issue.
 25 A. Yes, so at the relevant point in the Board meeting,

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1 for her not being called into the room to address
 2 Horizon issues?
 3 A. So I think in the minutes it says that -- if we just
 4 scroll down a bit. Oh, no, sorry, it's here. It's at
 5 (b). So the Board were concerned that the review opened
 6 the business up to claims and the Board asked if Susan
 7 Crichton as General Counsel was in any way implicated.
 8 So, as this conversation was going on and I was taking
 9 my notes, I assumed that it was because of that that
 10 Susan hadn't been invited into the room.
 11 Q. Yes. Did anybody say why?
 12 A. No.
 13 Q. Was there any discussion?
 14 A. No.
 15 Q. Let's read a little bit about what it says emerged from
 16 the meeting so (a):
 17 "The CEO explained that although the Second Sight
 18 Report had been challenging it had highlighted some
 19 positive things as well as improvement opportunities."
 20 So was it just the CEO who was addressing these
 21 issues, from your recollection?
 22 A. So from these minutes, and I believe, the CEO then took
 23 over responsible for delivering this paper.
 24 Q. Then:
 25 "(b) The Board were concerned that the review opened

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1 I stood up and walked towards the door and was asked to
 2 hang on a minute, to sit down because there was going to
 3 be, I assumed, a discussion before Susan came into the
 4 room. I mean, that did happen sometimes, if the Board
 5 wanted a discussion on the paper before the executive
 6 member came in, that did happen. So I was asked to sit
 7 down --
 8 Q. I could ask you to stop there: who asked you?
 9 A. I believe the Chair but -- yes, I believe the Chair
 10 because it would have been the Chair who would have said
 11 they needed to have a discussion.
 12 Q. Okay. So it was Alice Perkins?
 13 A. I believe so.
 14 Q. Thank you.
 15 A. So I sat back down as I was asked to do and then this
 16 part of the meeting progressed. I do believe that --
 17 and I don't know at what point but, at some point during
 18 this Board update, I believe I said to the Chair "Do you
 19 want Susan in the room because she has the detail?", and
 20 I was told "No".
 21 Q. This was a significant meeting because, as you have just
 22 explained, the CCRC have written to you the day before,
 23 you were copied in to that. We have seen that
 24 Ms Crichton was receiving very significant advice in
 25 relation to Gareth Jenkins. What explanation was given

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1 the business up to claims of wrongful prosecution. The
 2 Board asked if Susan Crichton, as General Counsel, was
 3 in any way implicated in the prosecutions ...
 4 "(c) The Board expressed strong views that the
 5 business had not managed the Second Sight review well
 6 and stressed the need for better management and cost
 7 control going forward."
 8 Now, minutes don't always reflect precisely what is
 9 said at a meeting. Can you assist us with that comment?
 10 Was there a particular -- there's a reference there to
 11 the business had not managed Second Sight well. Was it
 12 business that was the subject of their concern? Were
 13 there named people?
 14 A. So I think -- I believe, if there had been named people,
 15 I would have put those in the minutes. So I think the
 16 "not managing Second Sight well", and you can see there
 17 the cost control, I believe the Board thought -- and
 18 I can't speak for them individually, obviously, but,
 19 from this minute, I believe that the Board thought the
 20 Second Sight review was taking too long and that they
 21 weren't focusing in on what the Board had originally
 22 thought they were going to focus in, which was basically
 23 the computer.
 24 Q. You were somebody who was, as we've seen, quite involved
 25 in liaising with Second Sight. Was there any criticism

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1 of you in this meeting?

2 **A.** Not that I can recall.

3 **Q.** Did you infer any criticism of you?

4 **A.** I can't remember there being any criticism.

5 **Q.** Did you infer or was there any criticism of any specific

6 named individuals?

7 **A.** Well, only the Susan Crichton bit at the top. Can we go

8 down a little bit further?

9 **Q.** Yes.

10 **A.** Because they then go on to say the Board accepted it was

11 an independent review but they still thought the

12 business hadn't managed that review well.

13 **Q.** There's lots of reference to, "the business, the

14 business, the business", did they really just speak in

15 terms of the business or was there comment on the

16 performance of particular individuals?

17 **A.** Not that I can recall.

18 **Q.** We have there "ACTION: Susan Crichton". Was it normal

19 for somebody to be listed as the action point, having

20 not attended the meeting?

21 **A.** No, this is really unusual. It's really unusual that

22 someone was left outside the door. It's really unusual

23 for someone to get an action point without being in the

24 room.

25 **Q.** It being so unusual, why is there no reference to that

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1 uncomfortable with that, they would have said so.

2 **Q.** But it wasn't just that she wasn't at the meeting; it

3 was, as you've said, somebody specifically asked during

4 the course of the meeting for her not to come in.

5 **A.** Yes.

6 **Q.** Is that not a notable event that should be minuted?

7 **A.** I don't think so but, clearly, it could have been

8 minuted differently but the Chair and everyone who

9 checked these minutes were happy that this was the way

10 it was minuted.

11 **Q.** But you're the Company Secretary?

12 **A.** Yes.

13 **Q.** Are you responsible for the minutes or not?

14 **A.** Yes, I am responsible for the minutes.

15 **Q.** Could we turn to page 6, please, and have a look again

16 at the Horizon update. Did you, in this meeting,

17 mention having received a letter from the Criminal Cases

18 Review Commission?

19 **A.** No.

20 **Q.** No. One of the things that you said to me earlier was

21 that the General Counsel didn't need to attend all of

22 the Board meetings because you were personally in the

23 reporting line. Did you consider whether, at this

24 particular meeting, you should say something?

25 **A.** I didn't think I had the knowledge to say anything.

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1 fact in the minutes itself?

2 **A.** Well, there's reference that she is not in the room.

3 **Q.** Where's the reference to her --

4 **A.** Because she's not on the list. She's not named as --

5 there would have been, at the beginning, "Susan

6 Crichton, General Counsel, joined the meeting". So --

7 **Q.** But we have -- if we scroll up to page 1, if we scroll

8 down, we have "Apologies for Absence", we don't have

9 Susan Crichton's name there?

10 **A.** No.

11 **Q.** "In Attendance", we have who is there. We don't have

12 any reference to who is sitting outside the room waiting

13 to be called in and there isn't any reference throughout

14 these minutes to the fact that the Chair had asked for

15 Ms Crichton not to be called in. Is that something you

16 would expect to find in the minutes of a Board meeting?

17 **A.** No, no, I wouldn't.

18 **Q.** So if somebody had been asked to attend but had been

19 kept outside, you would not expect that to be minuted in

20 the minutes?

21 **A.** So I wouldn't have expected it to be, no, because the

22 Board minute is what happened in that room and she

23 didn't come into the room, and that's -- now the Board

24 minutes were agreed by the Chair, were agreed by the

25 Board at the following Board meeting, so if anyone was

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1 I could have told them about a letter but I couldn't

2 have told them what that letter meant or what we were

3 going to do about that letter. So I didn't have the

4 expertise to raise that.

5 **Q.** Irrespective of the CCRC issue, we've seen email, after

6 email, after email copied to you, sent to you, asking

7 for your opinion, relating to James Arbuthnot, relating

8 to Second Sight. Did you not think that Susan Crichton

9 not being in that meeting, you were actually quite

10 an appropriate person to address the Board on this

11 issue?

12 **A.** So I think the appropriate person to address the Board

13 was the CEO, was Paula Vennells, because she's

14 addressing the Board and has most of the updates that

15 I would have had.

16 **Q.** Do you think that you had provided her with the

17 sufficient information to speak to all of those issues?

18 **A.** I'm not sure the CCRC, because that had happened, you

19 know, the same -- the day before or the same day or

20 whatever but I believe that Paula would have known the

21 other issues with Second Sight and with, you know -- but

22 that's my recollection now.

23 **Q.** Could we just return to the first document that we saw

24 this morning, and that's the expert report, EXPG0000006,

25 please. It's page 30. It's the bottom of page 29 into

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1 page 30, please:
2 "The Company Secretary's accountabilities normally
3 include ..."

4 Then we have (e):
5 "Arranging participation of non-Board members for
6 specific items in Board discussions (including handling
7 sight of relevant minutes, timing of Board appearances,
8 follow up)."

9 Do you think you failed in that on this occasion?

10 **A.** No, I don't. I had arranged for Susan to be there at
11 the correct time to give her presentation to the Board
12 and I was stopped from getting her into the room by the
13 Chair. So I actually do think I was doing what it says
14 here.

15 **Q.** Do you think that not raising any concerns about that,
16 knowing that Susan Crichton was very well placed to
17 speak to the Horizon issues, was in any way a failing on
18 your part?

19 **A.** So I can't specifically remember but I think I will have
20 raised -- I would have raised concerns with that after
21 the meeting with Alice and possibly Paula.

22 **Q.** You would have raised concerns?

23 **A.** I believe I would have done. I can't specifically
24 remember but, having gone through that meeting, where
25 clearly Susan had been excluded from the meeting,

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1 picture at the Post Office, concerns about the Criminal
2 Cases Review Commission?

3 **A.** Not that I can remember.

4 **Q.** Do you think that the board or members of the Board were
5 kept properly up-to-date and informed of those
6 developments?

7 **A.** Well -- and I don't know if, you know, if it's
8 chronologically is -- if it's in this order, but
9 I wasn't appraised of the Clarke Advice, and I don't
10 believe that I -- well, I don't believe I sent the
11 Clarke Advice to the Board so, therefore, the Board were
12 not appraised of the Clarke Advice. So things should
13 have been sent that weren't, I think.

14 **Q.** Who do you place responsibility for that on?

15 **A.** Well, it has -- it has to be anyone who knew about the
16 Clarke Advice. I mean, I don't know who the Clarke
17 Advice was shared with, whether it was shared with the
18 Chair, whether it was shared with Paula. All I know is
19 that I don't believe I received it and I was not asked
20 to send it to the Board. So I don't know who made the
21 decision for it not to go to the Board but I don't
22 believe it ever went to the Board.

23 **Q.** Can we turn to POL00192758, please.

24 **SIR WYN WILLIAMS:** Before we do, Mr Blake, there's just one
25 aspect of the minutes that I would like to go back to,

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1 I would have raised that, I believe, with the Chair and
2 with Paula.

3 **Q.** What did you say?

4 **A.** I can't remember, I specifically can't remember.

5 **Q.** I mean, it's quite a significant moment in time --

6 **A.** No, absolutely.

7 **Q.** -- both for your professional career but especially for
8 this Inquiry. Do you recall any conversation with Paula
9 Vennells or Alice Perkins?

10 **A.** I can't recall any specific conversation but my belief
11 is that, if I'd -- if that had happened, I would have
12 spoken to especially the Chair about how that meeting
13 had been run and that someone was standing outside
14 waiting to deliver a report.

15 **Q.** We know that Board work doesn't just occur at those
16 formal Board meetings.

17 **A.** No.

18 **Q.** There are number of people who attended that meeting,
19 and a number of Non-Executive Directors, for example.
20 Did you have discussions over lunch, over dinner, over
21 a drink, over some other social activity with any of
22 them, raising concerns about how that particular meeting
23 was conducted?

24 **A.** Not that I can remember.

25 **Q.** Did you have any discussions with them about the growing

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1 if I may.

2 **MR BLAKE:** Absolutely. Those minutes are POL00021516.

3 **SIR WYN WILLIAMS:** If we go to the section dealing with the
4 Horizon update, which I think is page 6.

5 **MR BLAKE:** Yes.

6 **SIR WYN WILLIAMS:** So under (b) the specific question is
7 raised as to whether Ms Crichton was, in any way,
8 implicated in the prosecutions, and then there's
9 a report of what followed. Could we now go to (e),
10 please, over the page. There's an explicit reference
11 there, is there not, Ms Lyons, to the Board asking
12 Ms Vennells if she had considered changing the person
13 leading for the business. All right?

14 Now, the person leading for the business, we've been
15 told, was Ms Crichton; was that your understanding?

16 **A.** Yes.

17 **SIR WYN WILLIAMS:** So is that the reason she was excluded
18 from the meeting because, in effect, she was going to be
19 criticised?

20 **A.** Possibly. Possibly.

21 **SIR WYN WILLIAMS:** Thank you. Yeah, over to you, Mr Blake.

22 **MR BLAKE:** Is it a little odd that she's not mentioned by
23 name in the -- I mean, you said that if somebody had
24 been mentioned by name it would be in the minutes. It's
25 a bit cryptic, isn't it, the "person leading"?

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1 A. I don't think anything was meant by that. I think
 2 that -- I don't think it was -- I can't remember these
 3 minutes and I don't think it was changed, you know,
 4 anybody said, "Oh that shouldn't be mentioned by name".
 5 So I can't remember.

6 Q. Can we now turn to POL00193019. I'm going to skip out
 7 that other document.

8 We're now moving to 30 July 2013 and an email from
 9 Simon Baker, you're copied in there:

10 "All
 11 "You will shortly receive an invitation to a Horizon
 12 Investigation Risk workshop.

13 "The purpose of the workshop is to identify,
 14 quantify and produce mitigation plans for the risks
 15 associated with the Horizon investigation and related
 16 activities, including an improvement project to respond
 17 to the findings."

18 Do you recall the Horizon Investigation Risk
 19 workshop?

20 A. I don't, I'm afraid. I don't think I was a member.
 21 I think I was just being told it was happening.

22 Q. Thank you. Can we turn now to POL00193585. This is
 23 advice from Bond Dickinson on the risks principally to
 24 the directors of the company. Do you recall this
 25 advice?

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1 a prosecution case or assisted with an accused's
 2 defence."

3 By this stage, that is August 2013, were you aware
 4 of concerns about the reliability of Gareth Jenkins?

5 A. So I didn't -- I do not believe I saw this advice.
 6 I don't believe I sent this advice to the Board.

7 Q. Because, over the page on page 3, there's a section on
 8 D&O risks, and it says:

9 "We have considered whether a claim could lie
 10 against a director or officer of Post Office. We think
 11 this is unlikely, as it will be difficult for
 12 a subpostmaster to pierce the corporate veil. Most of
 13 the above claims, if brought and if viable, would be
 14 against Post Office Limited as a company. Nevertheless
 15 we can envisage the following possible scenarios
 16 involving directors and officers ..."

17 They set out there the possible claims that could be
 18 brought. Now, we saw in those Board minutes that we
 19 looked at a concern amongst the Board of their potential
 20 liability for matters arising from --

21 A. Yes, yes.

22 Q. -- Second Sight's Report. This seems to be an advice
 23 that addresses those very risks. Why do you think it is
 24 that this wasn't brought to your attention if it wasn't?

25 A. I have no idea because this is exactly what the Board

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1 A. No.

2 Q. One of your responsibilities, I think, as Company
 3 Secretary, involved looking out for the kinds of risks
 4 that are discussed in this document --

5 A. Yes.

6 Q. -- is that right? If we look over the page, please, we
 7 can see section there "Risks to Post Office":

8 "Prosecutions and convictions
 9 "As noted above, where circumstances warrant, Post
 10 Office prosecutes subpostmasters who have acted
 11 criminally. The basis of these prosecutions is often
 12 found in the transaction records recorded in Horizon.
 13 As a result of Second Sight's investigation/Interim
 14 Report, Post Office is reviewing all its criminal
 15 prosecutions over the last three years to identify any
 16 cases where a conviction may be unsafe.

17 "In particular, the expert evidence of one Post
 18 Office witness, Dr Gareth Jenkins of Fujitsu, may have
 19 failed to disclose certain historic problems in the
 20 Horizon system. Under the criminal prosecution
 21 guidelines, Post Office has an obligation to disclose
 22 this previously undisclosed information to
 23 subpostmasters' defence counsel. Post Office is
 24 required to make these retrospective disclosures where
 25 the additional information ... may have undermined

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1 were asking for.

2 Q. Do you recall the Board ever receiving that kind of
 3 advice?

4 A. So I believe there was a paper, I think written by Chris
 5 Day, about a D&O risk, but I do not think the Board
 6 or -- I certainly did not receive -- I don't believe
 7 I received this and I don't believe I sent it to the
 8 board. Again, I can't say if any Board members saw this
 9 advice, as in the CEO or the Chair. But --

10 Q. Separately, as at that time, so August 2013, were you
 11 personally aware of the concerns about the reliability
 12 of Gareth Jenkins' evidence?

13 A. No. Because this document would have made that very
 14 clear, as well.

15 Q. Yes. Thank you. Can we please now -- we're going to
 16 move on to autumn 2013. Could we please look at
 17 POL00146545. If we could start at the bottom of page 2,
 18 the bottom of the page. We have an email from Jarnail
 19 Singh to you, saying:

20 "Alwen
 21 "For criminal prosecution and civil litigation cases
 22 it is essential for Post Office to instruct expert
 23 witness to produce expert reports on the impact of
 24 Second Sight's Interim Report on the Horizon system.
 25 Please find attached both CV from Professor Kramer and

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1 Professor Dulay from Imperial College London who have
 2 agreed to undertake the expert witness work."
 3 If we scroll up we see a response from you saying:
 4 "I think Lesley and Hugh should sign this off.
 5 Lesley from an IT perspective, that these CVs will mean
 6 they will understand and be able to explain Horizon."
 7 At this stage, where Jarnail Singh is specifically
 8 contacting you about two potential new experts, were you
 9 aware of concerns about the reliability of Gareth
 10 Jenkins.
 11 A. So, at this stage, I knew that we -- I knew the business
 12 was not using Gareth Jenkins any more because I think
 13 something came up as an ARC meeting and we talked about
 14 finding an expert witness, but there was no explanation
 15 as to why we were no longer allowed to use Gareth
 16 Jenkins or if he'd retired, or -- I didn't know that
 17 information. But we were asked -- the Board asked for
 18 this specific thing to happen, for us to go and find,
 19 and to find out how much it would cost as well, because
 20 that was the other issue that came up in the ARC.
 21 Q. Did no one ever ask the question: why aren't we using
 22 our own expert?
 23 A. So I think in -- I think it says somewhere that we can
 24 no longer use, and I don't remember ever it being asked
 25 "Well why?"

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1 had been requested of Brian Altman, now KC, relating to
 2 potentially stopping prosecuting altogether?
 3 A. I can't remember it.
 4 Q. Would it have concerned you that somebody described as
 5 the Post Office's "über QC" was advising on
 6 a significant matter relating to prosecutions and that
 7 wasn't widely known?
 8 A. So I -- so what I thought we were chasing here was a new
 9 expert witness and that's the piece of work that
 10 I thought I was helping to coordinate by getting the CVs
 11 looked at or whatever. Now Susan is saying we might not
 12 be doing this any more. I mean, I think in an earlier
 13 document, there's something about ceasing prosecutions.
 14 So I'm not surprised that we are considering ceasing
 15 prosecutions but, if we are going to prosecute, we need
 16 a new expert witness.
 17 Q. Was that discussion, so the issue that was not widely
 18 known within the Post Office, was that known at Board
 19 level, do you think?
 20 A. I can't remember if it was ever taken to Board that
 21 Brian Altman was doing this work.
 22 Q. Again, it's a small group of people, similar group to
 23 the emails that we've seen over the years in 2012 and
 24 into 2013. Is it surprising that, at this stage, you
 25 still are not aware of concerns that were raised about

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1 Q. Ever asked or ever asking?
 2 A. I don't remember ever asking. If someone says to you
 3 "We're no longer doing that, we're doing this, go away
 4 and sort that out", we were doing the "Go away and sort
 5 that out".
 6 Q. You had personally liaised with Gareth Jenkins --
 7 A. Yeah.
 8 Q. -- over a number of years; was it not surprising you
 9 were moving on to new experts?
 10 A. Well, I'd had probably a dozen emails from Gareth
 11 Jenkins when I was asking for things. I didn't know
 12 Gareth, I don't think I'd ever met Gareth, so I didn't
 13 read anything into it, apart from we need a new expert
 14 witness.
 15 Q. Moving on to POL00146548, please. On page 1, there's
 16 an email from Hugh Flemington, if we scroll down, to
 17 Lesley Sewell and you -- thank you, sorry, if we could
 18 scroll up -- topic being "Experts Horizon issues". He
 19 says as follows:
 20 "Susan was minded to slow this down: Brian Altman
 21 (our über QC) may recommend that [the Post Office] cease
 22 prosecuting altogether -- therefore why waste time and
 23 money committing to this person. This piece of work is
 24 not widely known within [the Post Office]."
 25 Were you aware at that time of a piece of work that

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1 Gareth Jenkins?
 2 A. Well, unless someone had shared that with me, I wouldn't
 3 have been aware. You know, a lot of the people on these
 4 emails are the lawyers. I wouldn't have been aware
 5 unless someone told me.
 6 Q. Okay, I'm going to now move on to 2014. Could we please
 7 turn to POL00147542. I'll just go to a few documents
 8 from 2014 and then we're going to move on to a separate
 9 subject of remote access.
 10 A. Okay.
 11 Q. We have the second email from Alice Perkins to yourself.
 12 We're now in March 2014, and it relates to the Audit and
 13 Risk Committee papers, and she says:
 14 "I can't attend this meeting but I was looking at
 15 the papers to see the post-mortem/lessons learned from
 16 Horizon/[Second Sight] stuff. I thought we were told at
 17 the board last week that it was on the agenda for this
 18 meeting? What am I missing -- braincells or paper or
 19 neither?!"
 20 Then you forward that to Belinda Crowe, and say:
 21 "I need to go back on this. I thought you had
 22 discussed the delay on this with her."
 23 Can you recall the context of this discussion?
 24 A. So, again, I'm assuming here but I'm reading these
 25 emails and I'm thinking that, on the original ARC agenda

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1 there was a piece on there about Horizon/Second Sight
 2 post-mortem or whatever we want to call it, lessons
 3 learned, and that Alice was expecting that to be on the
 4 agenda and was expecting a paper. I clearly have taken
 5 it off the agenda on the advice of Belinda because it's
 6 either not ready or whatever. I've sent the papers out
 7 without it, and Alice is saying, "Well, where's the
 8 paper on Horizon/Second Sight?"

9 I wouldn't have sent that paper, I don't believe,
 10 unless I thought that Belinda had had this conversation
 11 with Alice because I knew, because I'd been in the Board
 12 the week before, and I knew that Alice was expecting
 13 this to come to ARC.

14 **Q.** Thank you. One final document before we move on, and
 15 that's POL00147834.

16 We're still in 2014, we're in March 2014 and you are
 17 there giving thoughts on advice received from
 18 Linklaters. Can you assist us with why you were there
 19 giving your thoughts on --

20 **A.** So I would only have given my thoughts, I think, if I'd
 21 been asked and, because I'm sending it direct to Chris,
 22 I assume I was asked by Chris, rather than Chris and
 23 Paula, but clearly I've sent it to both of them, and
 24 I have gone through the Linklaters advice and given
 25 them -- I've been asked for my opinion, I think, on how

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1 subpostmasters are not employees. There is no broader
 2 duty of care which would extend the contractual duties
 3 owed by the Post Office in any respect relevant to the
 4 issues in this Report."

5 Your comment is as follows, it's 1.2:

6 "... said in this way this is exactly the heavy
 7 handed big business [versus] small subpostmasters that
 8 James [Arbuthnot] thinks we are guilty of."

9 **A.** Mm-hm.

10 **Q.** So it's talking about the relationship between
 11 subpostmasters and James Arbuthnot is concerned that
 12 it's a heavy-handed relationship. Was that shared
 13 amongst the Board? Are you summarising here what you
 14 think the Board's views are or are they your own views?

15 **A.** So this was shared with Alice, certainly at her first
 16 meeting with James, and I can't remember whether she
 17 shared that -- she gave an update to the Board. I'm not
 18 sure -- I can't remember whether she shared that with
 19 the board or if at any of the other meetings that we've
 20 seen today, whether it was mentioned. Sorry, I've --

21 **Q.** Was that a concern though. I mean, was it something you
 22 ever discussed with the CEO, the Chair, senior
 23 executives, about a heavy-handed big business versus
 24 small subpostmaster relationship?

25 **A.** So I think it might have been a concern for the chair

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1 the Board will respond to the Linklaters advice, and
 2 that's what I've done here. But it's only my opinion.
 3 I don't -- the Board might not have responded like this.
 4 It's just my opinion.

5 **Q.** I'd just like to go through a few of those and, if we
 6 could bring up on screen alongside it, the Linklaters
 7 advice, and that is POL00107317, please. Thank you.

8 So if we could turn to 1.2 on the left-hand side, so
 9 that is, I think, the second page. Thank you. So the
 10 Linklaters advice, do you recall the circumstances in
 11 which the Linklaters advice had been sought?

12 **A.** So I think the Board had asked for advice on the
 13 subpostmaster's contract and -- the subpostmaster's
 14 contract and whether the subpostmaster's contract
 15 enabled the Post Office to get money back from the
 16 subpostmasters over losses. I think that's -- and
 17 that's me paraphrasing it but ...

18 **Q.** They say on left-hand side:

19 "The relationship between subpostmasters and the
 20 Post Office is governed by the standard form contract
 21 which, according to its terms, allows the Post Office to
 22 recovery losses and is terminable on three months'
 23 notice without the need to specify a reason. The
 24 relationship between the subpostmasters and the Post
 25 Office is one of principal and agent and the

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1 because of the conversations that she'd had with James.
 2 Wider than that, I can't really say.

3 **Q.** Okay. 1.4:

4 "Absent such proof that Horizon is not working as it
 5 should, the Post Office should be able to recover losses
 6 which the Horizon records indicate are owing on
 7 an individual [subpostmaster's] account. If the Post
 8 Office is entitled to recover losses, then there can be
 9 no question of a consequential loss claim on the part of
 10 the [subpostmaster] relating to their recovery ..."

11 You say:

12 "... the Board will be in different places, NM ..."

13 Is that Neil McCausland.

14 **A.** Yes.

15 **Q.** So he was a non-executive?

16 **A.** He was, he was the SID as well.

17 **Q.** The --

18 **A.** Senior Independent Director.

19 **Q.** Thank you:

20 "... will say good then we can put the lid back on
 21 the can of worms and pay very little. AP ..."

22 That's Alice Perkins, is it?

23 **A.** Yes.

24 **Q.** "... will be more concerned about political optics."

25 Is this an insight we get into the different

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1 positions on the Board on paying money to subpostmasters
 2 or recovering money?
 3 **A.** These are just my thoughts of how I think they would
 4 respond. So, you know, they may have responded very
 5 differently. So these are just -- you know, this is how
 6 I think they will respond when they read this document
 7 and Alice was always concerned about the political
 8 optics and making sure that we took account of what MPs
 9 were saying, et cetera, et cetera, and Neil was much
 10 more pragmatic, I suppose, about, you know, how do we
 11 take this forward.
 12 **Q.** The suggestion, though, being that he was also concerned
 13 about not paying very much.
 14 **A.** I think everyone, I think the whole Board were concerned
 15 about the cost.
 16 **Q.** Thank you. If we scroll down the left-hand side to 2.3:
 17 "Importantly, Jo Swinson, the Parliamentary Under
 18 Secretary of State for Employment Relations and Consumer
 19 Affairs, noted that there was no evidence of a systemic
 20 problem with Horizon. This has also been the Post
 21 Office's conclusion on the information so far available
 22 to it. We know that there is, so far as we understand
 23 it, no objective report which describes and addresses
 24 the use and reliability of Horizon. We do think that
 25 such a report would be helpful, though there is
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1 doubts about the reliability of the system then this
 2 could obviously impact on the Post Office's ability to
 3 claim losses since it calls into question whether such
 4 losses exist at all. This is the fundamental question
 5 and one which has not yet been satisfactorily
 6 addressed."
 7 You say:
 8 "... this will worry them as we have said all along
 9 that there is no systemic issue with Horizon, this may
 10 make them think there might be an issue and why hasn't
 11 the business undertaken a proper forensic review/audit."
 12 So you had here received advice from Linklaters
 13 questioning whether, in fact, the Post Office had
 14 properly looked into the reliability of Horizon and you
 15 were concerned that that would worry the Board?
 16 **A.** Well, it's sort of the same point as 2.3, that we talked
 17 about earlier, is that this is now saying that we need
 18 a proper forensic review of Horizon before we can say it
 19 has integrity.
 20 **Q.** If we scroll down, please, to 5.55. This is the last
 21 paragraph we'll look at in this document. 5.55:
 22 "The Post Office in its capacity as a prosecutor has
 23 duties of disclosure which extend beyond the date of
 24 conviction in any particular case. [Then it cites
 25 a case there] it was observed that private prosecutors
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1 a decision to be made about how broad and/or thorough it
 2 needs to be."
 3 Your comment on that, if we look on the right-hand
 4 side is:
 5 "[It's] unhelpful, because it suggested that we
 6 should have taken a different route, and commissioned
 7 such a report rather than use Second Sight, so why
 8 didn't we."
 9 **A.** So -- sorry.
 10 **Q.** No, you carry on, please.
 11 **A.** So that comment there is how I think -- my thoughts of
 12 how I think the Board will respond because we've already
 13 had, in a Board meeting, the suggestion that business
 14 hasn't managed Second Sight and it's all taking too long
 15 and -- et cetera, et cetera. So I think 2.3, because
 16 2.3 on the left-hand side is suggesting that we need to
 17 do a more in-depth report to address the use and
 18 reliability of Horizon, I think the Board will be
 19 frustrated because they thought that's what they were
 20 getting with Second Sight.
 21 **Q.** Thank you. If we stick with the left-hand side and
 22 scroll down, let's go to 5.30. It's page 8. Thank you.
 23 So 5.30 says:
 24 "It is the reliability of the Horizon system as
 25 a matter of principle which is important. If there are
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1 are subject to the same obligations to act as
 2 a ministers of justice as the public prosecuting
 3 authorities. Any material in the possession of Post
 4 Office which might cast doubt on the safety of any
 5 particular conviction ought therefore to be disclosed to
 6 the convicted party."
 7 Your comment on that is:
 8 "This will cause concern again as it reopens the
 9 [Post Office] as a prosecutor, even if that is not what
 10 is being said."
 11 So is it fair to say that, as at March 2014, you
 12 were concerned that the Board would not be happy with
 13 the Linklaters advice, both because it raises issues
 14 with the reliability of the Horizon system, the fact
 15 that there hasn't been a comprehensive report addressing
 16 Horizon and also that it raised issues relating to the
 17 Post Office's prosecution role?
 18 **A.** So as I've said, this email is me assuming what the
 19 Board will think. So that's a bit dangerous but that's
 20 me assuming that's what they will think, and what I've
 21 tried to do in the report is highlight the areas that
 22 I think will cause concern for the Board. And the main
 23 concern, I think, is that the Linklaters report seems to
 24 be saying "This is all fine, you can reclaim monies,
 25 et cetera, et cetera, however you have to prove first
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1 Horizon's integrity".

2 And I think, firstly, the Board thought we were

3 doing that with Second Sight and that's clearly not

4 enough. So what I've tried to say -- and the

5 prosecution -- the prosecutor piece -- because this 5.55

6 is referring to the Clarke Advice and Gareth Jenkins.

7 Well, I hadn't seen that, I didn't believe the Board had

8 seen that, so I'm not -- when I say "reopened the PO as

9 a prosecutor", I'm not reading that as the Clarke

10 Advice; I'm reading it as, you know, Post Office has

11 a capacity as a prosecutor and I believed we were

12 already doing some work to understand how we would

13 change that.

14 **Q.** Looking back now at when that report ultimately went to

15 the Board, do you recall concerns that you had expressed

16 in that email arising or not arising?

17 **A.** I honestly can't remember.

18 **Q.** Okay, thank you.

19 Sir, I only have one more topic to address before

20 handing over to Core Participants but I think that might

21 be an appropriate time to take our mid-afternoon break.

22 **SIR WYN WILLIAMS:** Certainly. All right. So we'll resume

23 again at 3.30, okay.

24 **MR BLAKE:** Thank you very much.

25 **(3.16 pm)**

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1 "I have just spoken to Lesley who has engaged

2 Fujitsu today and is confident that within a week they

3 will provide evidence about access and audit trails

4 etc."

5 "Lesley and I will meet [Fujitsu] on the third to go

6 through this, and then if we are comfortable go through

7 with [Second Sight] and [Fujitsu] on the 6th, so let the

8 technical people can discuss the detail."

9 So as at May 2013 you were aware of a specific

10 interest in the issue of remote access?

11 **A.** Yes.

12 **Q.** Could we look at POL00029590, on the second page. We're

13 now in June, 4 June, an email from Martin Edwards, Chief

14 of Staff to Paula Vennells. He says:

15 "... as you know, Paula is seeing Alice tomorrow.

16 She asked if you could provide an update on the latest

17 state of play with James Arbuthnot *et al.*"

18 Your response is above that. I will just read to

19 you a couple of passages from your response. You say:

20 "SS [Second Sight] are now working on the 3 cases as

21 agreed which include the Rudkin case, where he alleges

22 that he heard someone at Fujitsu state they could alter

23 a subpostmaster's account.

24 "Lesley and I had a meeting with Fujitsu this week

25 and they are providing for us an audit trail of

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1 **(A short break)**

2 **(3.29 pm)**

3 **MR BLAKE:** Thank you.

4 Moving on to the topic of remote access. Could we

5 start with POL00029589, please, second page, please --

6 over the page -- an email from Paula Vennells to you.

7 She says:

8 "Alwen, thanks for the various documents coming

9 through! An enormous volume. Hopefully, you will be

10 reaching the end soon.

11 "How did the call go [this morning] [regarding James

12 Arbuthnot] with [Second Sight]? And has Janet been in

13 touch?"

14 If we go over the page to page 1 at the very top, we

15 have an e-mail from you to Paula Vennells. You say:

16 "Okay here goes

17 "Good call with [Second Sight] but James has

18 definitely caused confusion with his cases or themes or

19 topics etc.

20 "[Second Sight] have agreed they will look into

21 3 cases, they will tell JFSA which 3 cases to keep them

22 on board but [Second Sight] are choosing which.

23 "One of these will be dealing with the issue of

24 remote access to a subpostmaster's account, which James

25 specifically raised.

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1 adjustments which can be made centrally which they say

2 happens very rarely, so we are waiting to see that and

3 the controls in place. However they suggest that what

4 Rudkin heard was testers [from Horizon Online] referring

5 to test data and not the live environment. This would

6 be good if we could prove it.

7 "The plan is to look at the audit trails and then

8 have a joint meeting with us, [Second Sight] and

9 Fujitsu."

10 So you're specifically there raising the issue of

11 Mr Rudkin's case and remote access to Paula Vennells or

12 Paula Vennells' Chief of Staff.

13 **A.** Yes.

14 **Q.** POL00029601. We're moving to 11 June now, and this is

15 an email from Ron Warmington of Second Sight, in advance

16 of a call the next day. He says:

17 "I'm afraid only two of the seven documents that

18 you've enclosed seem to be relevant to SR005 ..."

19 That's Mr Rudkin's case --

20 **A.** Yes.

21 **Q.** -- the remote access case:

22 "The other five (in themselves excellent) documents

23 that were enclosed all relate to [Horizon Online],

24 which, as is explained in Gareth Jenkins' ... affidavit

25 was rolled out between January and September 2010. They

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1 are therefore irrelevant to SR005 ..."

2 Do you remember this morning I was mentioning

3 an email from Mr Warmington that was concerned with

4 overdisclosure of irrelevant material.

5 **A.** Yes, yes.

6 **Q.** Then if we scroll down, he raises a concern, he says:

7 "Luckily, we have picked up this basic error at this

8 point and not while presenting our Interim Report to

9 a roomful of MPs."

10 Over the page, please:

11 "I'm really looking forward to tomorrow's call. But

12 we need to produce something that is crisp, easy to

13 understand, and that absolutely NAILS this really

14 serious allegation once and for all."

15 Do you recall Second Sight being determined to get

16 to the bottom of that remote access issue as well?

17 **A.** Yes, I think they were but I think the business were as

18 well.

19 **Q.** If we move on to 24 June, that's POL00188912. This is

20 an email I took you to earlier but I said I'd come back

21 to it. If we scroll down to the second email, it's

22 Simon Baker to you, Susan Crichton and Lesley Sewell.

23 He's had a call with Ron and Ian, SR005, so the same

24 case, the Rudkin case:

25 "[They're] Very unhappy (and angry) with our

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1 "It is unfortunate that, due to the length of time

2 that has elapsed ... neither [the Post Office] nor

3 Fujitsu were able to identify any individual who met

4 with the [subpostmaster] ..."

5 Then they refer to managing to find an email proving

6 that the meeting took place:

7 "Unfortunately, due to a change in email systems,

8 emails from 2008 have yet to be provided to us, but

9 [they] have reviewed", some of the relevant material.

10 Then if we look down at 1.14, this is how they end

11 their review into Mr Rudkin's case. They say:

12 "We are left with a conflict of evidence on this

13 issue and our enquiries are continuing, particularly in

14 light of the new information confirming that the meeting

15 on 19 August 2008 did in fact occur."

16 So concerns prior to Second Sight's Interim Report

17 raised by Second Sight about the lack of information or

18 lack of clarity on the remote access issue, and, in

19 fact, there's no greater clarity by the time they've

20 produced their Interim Report. They make clear that

21 it's still up in the air.

22 **A.** Yes.

23 **Q.** Is that your understanding?

24 **A.** Yes.

25 **Q.** Moving on in time, please, to 30 April 2014, could we

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1 response to SR005 -- 'Post Office haven't answered the

2 questions, just spouting out the same old line'. We

3 need to sort this out in the next few days. I have

4 taken the action provide them focused information which

5 should provide them what they need. Although I am

6 concerned about the time I have to gather it."

7 The response above from you, you email Lesley Sewell

8 and say:

9 "Lesley I think you're going to have to get involved

10 in the Bracknell one or we are going to lose the

11 argument."

12 So you're escalating it there with Lesley Sewell?

13 **A.** Yes.

14 **Q.** Do you recall Second Sight being unhappy and angry at

15 this stage?

16 **A.** Only from documents that I've been sent from the

17 Inquiry. I didn't -- I didn't recall this specifically

18 but all I'm doing here is saying, you know, "Second

19 Sight clearly are not getting what they want, Lesley,

20 you own the relationship, you've got to get involved".

21 **Q.** Thank you. Then we have the Interim Report that was

22 ultimately produced, that's POL00099063, and that's

23 8 July 2013. This is their Interim Report. If we look

24 at page 12, it addresses Mr Rudkin's case, spot review

25 SR05. If we go over the page, 1.7, for example:

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1 please look at UKGI00019321. This is a Board meeting,

2 which you are in attendance. If we could please turn to

3 page 6, there's now reference to the Deloitte report.

4 Do you recall discussion about the Deloitte report?

5 **A.** I do, yes.

6 **Q.** Was one of the purposes of the Deloitte report to assist

7 with that issue of remote access, to get greater clarity

8 in that?

9 **A.** So I think the main purpose of the Deloitte report, from

10 my memory, was that, whereas the Linklaters report had

11 said -- had given us information about the contract, it

12 was predicated on that Horizon had integrity. So

13 I believe the Deloitte report -- and there were two

14 halves, I think, because one was up to -- one was

15 older -- one was new Horizon and then there was some

16 look at old Horizon but that came later, but I believe

17 the Deloitte report was asked for to fill that gap.

18 **Q.** Was one of those gaps in corporate knowledge to do with

19 the remote access issue?

20 **A.** So I can't specifically remember that but it may well

21 have done.

22 **Q.** Do you recall getting any greater clarity after the

23 Interim Report on that very issue?

24 **A.** After the Interim Report?

25 **Q.** Yes. So we've seen the Interim Report --

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1 A. Yes.

2 Q. -- ended up without any --

3 A. Without any -- yes -- so, no, I don't think the interim
4 report moved us forward at all.

5 Q. So we have here the Board discussing the Deloitte
6 report. This in advance of the Deloitte report, and it
7 says:

8 "The Board welcomed Lesley Sewell ... and Gareth
9 James [who was a partner at Deloitte], to the meeting.
10 Chris Aujard also rejoined the meeting.

11 "The Chairman thanked Gareth James for his draft
12 report and explained that there were a number of people
13 who were sceptical about Horizon. The Board were
14 concerned to know the truth about the reliability of the
15 system. Deloitte's views would need to be expressed in
16 such a way that they would persuade reasonable lay
17 people."

18 It might be suggested that that last sentence there
19 is suggestive of trying to direct Deloitte in
20 a particular way, to persuade people. Is that your
21 understanding of those words?

22 A. No, my understanding of that is that it needs to be
23 written in such a way as people can understand it and
24 that's what I'm reading into that. So make it
25 accessible is -- I think.

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1 page. It's an email from you to Chris Aujard and
2 Belinda Crowe. Thank you very much.

3 This is 23 May, so we've seen there the meeting
4 itself was 21 May. Presumably, the minutes themselves
5 are not typed up on 21 May; there is a process that
6 follows that meeting.

7 A. Yes.

8 Q. We're now on 23 May, which is the date that the Deloitte
9 report was actually produced.

10 A. Okay.

11 Q. So that is what we refer to as the final Deloitte
12 report, although I think, on the front, it says that
13 it's a draft for discussion, or something along those
14 lines. You are emailing Chris Aujard and Belinda Crowe
15 and you say as follows:

16 "It's a bit smoke and mirrors but here are the
17 minutes, comments ASAP please."

18 Now, I think in your witness statement you've said
19 that there's no issue with the words "smoke and
20 mirrors", you didn't mean anything by it; is that
21 correct?

22 A. Well, clearly, it's very unprofessional and I shouldn't
23 have put it in the email. I seem to recall that when
24 I left -- when I escorted Belinda and Chris out of the
25 meeting, because the conversation had been quite

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1 Q. Thank you. Then (e):

2 "Chris Aujard explained that several of the
3 subpostmasters who were challenging Horizon had made
4 allegations about 'phantom' transactions which were
5 non-traceable. Assurance from Deloitte about the
6 integrity of the system records logs would be very
7 valuable.

8 "The Board asked what assurance could be given
9 pre-2010 when the different Horizon system was in use.
10 It was agreed that Gareth James would produce and cost
11 a proposal for additional work to enable assurance for
12 the wider system, including pre-2010."

13 There was then a further Board meeting that followed
14 the report, can we please turn to POL00021525. That is
15 the Board meeting of 21 May 2014. Do you recall that
16 Board meeting?

17 A. I'm not -- no, not in detail.

18 Q. I'll take you to the relevant part. So it's page 9.

19 There's a section on Sparrow. We see there, if we
20 scroll down, reference there to the draft executive
21 summary of the Horizon Assurance Review having been
22 circulated to the Board.

23 I want to see how these minutes were drafted.

24 A. Okay.

25 Q. Could we turn to POL00384388, please. It's the second

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1 cyclical in terms of Sparrow, and Belinda, I believe,
2 turned to me and said, "Oh, good luck with minuting
3 that", and I'd said to her, "It's a bit smoke and
4 mirrors", and I stupidly had carried the conversation on
5 to this email but it's unprofessional and it shouldn't
6 have happened.

7 Q. But, I mean, "smoke and mirrors" is suggestive of in
8 some way misleading?

9 A. Yeah, no, that's not what I meant and my minutes were
10 not misleading.

11 Q. What you are doing, though, is you're sending to Belinda
12 Crowe and Chris Aujard draft minutes that they are then
13 amending?

14 A. So my practice was that I would take verbatim notes
15 wherever possible and when the conversation was cyclical
16 and that was quite -- that became quite difficult, but
17 they were taken, I would then draft the minute, and it
18 would be sent out to the executive member or -- Belinda
19 wasn't an executive member, but the executive member who
20 was responsible for the input to that part of the
21 meeting. They would then give their input. I would
22 then get that back and I would revisit my verbatim notes
23 to check that, actually, their input had come to the
24 meeting first, and that it was accurate. So that was my
25 practice and then, after that had happened, the minute

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1 would go to the Chair for their input.

2 **Q.** If we scroll up we can see that Belinda Crowe has
 3 responded, and she says:
 4 "Comments from me but Chris will need to agree. We
 5 are going to be speaking shortly."
 6 If we scroll down we can see, now they're in
 7 a slightly different colour, I think, the comments. We
 8 might be able to see them if we scroll down, please,
 9 under "Sparrow". Can you see? It's a little difficult
 10 to see but the comments seem to be in a slightly less
 11 dark format.

12 **A.** Okay.

13 **Q.** So it has been amended here as follows:
 14 "It was reported that [and then] the draft executive
 15 summary of the Horizon Assurance Review prepared by
 16 Deloitte had been circulated to the Board. Chris
 17 advised that it was anticipated that the full review
 18 would be available to the business on Friday, 23 May and
 19 that he would circulate it to the ... Board ..."
 20 It's this addition I would like to ask you about:
 21 "... as soon as possible but only when he was
 22 satisfied with its drafting and clarity of expression;
 23 it was agreed that he would escalate within Deloitte if
 24 he had concerns about the quality of the product."
 25 Now, that was added on the day that, in fact, that

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1 hadn't -- if this hadn't been in there at whatever --
 2 you know, whatever level, I would have gone back and
 3 challenged Chris and Belinda. I don't remember doing
 4 that.

5 **Q.** Are the number of changes unusual?

6 **A.** So ...

7 **Q.** If we scroll down, we can see more over the page as
 8 well.

9 **A.** So this -- there was a lot of information being put in
 10 by Belinda and Chris, who obviously wanted as much
 11 information in here as possible.

12 **Q.** Or wanted to direct how the minutes would read?

13 **A.** Well, you know, I think -- I believe I went back and
 14 checked my notes and a lot of this information might
 15 have been in their report, and my practice was not to
 16 regurgitate the report in the minutes because the Board
 17 had the report. So --

18 **Q.** They didn't yet have the report, though, did they?

19 **A.** They brought a report to this meeting, didn't they?

20 **Q.** They had an executive summary at the meeting.

21 **A.** Yes.

22 **Q.** The report would follow and the words that were inserted
 23 were to the effect that they wouldn't necessarily
 24 receive the report straight away.

25 **A.** Right. So this does look as if there'd been a lot of

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1 Chris Aujard and Belinda Crowe received the report
 2 itself, so they are amending minutes referring to
 3 a report that they have now received.

4 **A.** I didn't realise that.

5 **Q.** No. Do you see an issue with that?

6 **A.** I would if I didn't believe that I went back to my
 7 verbatim notes and checked them.

8 **Q.** I mean, is it possible that those words that are
 9 highlighted there were not actually spoken at that
 10 meeting?

11 **A.** Well, we do say that we want them to be clear, don't we,
 12 we want them to be understandable?

13 **Q.** Sorry, it's the second --

14 **A.** Yes, yes.

15 **Q.** So it's him saying, in essence, that he would escalate
 16 to Deloitte if he had concerns about the quality of the
 17 product and the Board might not be receiving it when he
 18 receives it.

19 **A.** Yes. I -- with hindsight, knowing that they received
 20 the report on the same day, that might be an issue, if
 21 Belinda and Chris are responding to this having read the
 22 report, then that's a completely different mindset to
 23 just responding to this as this is what they believe
 24 they told the meeting. I do think I would have gone
 25 back and checked my verbatim notes and, if they

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1 additions. However, I would -- my practice, as I say,
 2 was to go back and check my verbatim notes and, if
 3 I hadn't heard this at the meeting, I would have gone
 4 back to Chris and Belinda and said, "Actually, you
 5 didn't say any of this, you can't just have them in the
 6 minutes".

7 **Q.** Thank you. Let's look at the report very quickly. It's
 8 POL00028062. It's page 31. Did you read the Deloitte
 9 report?

10 **A.** So I'm not sure that I saw the long Deloitte report and,
 11 therefore, I'm not sure the Board saw the long Deloitte
 12 report.

13 **Q.** Given that you had a governance aspect of your role --

14 **A.** Yes.

15 **Q.** -- why would you not have read the Deloitte report?

16 **A.** Because I'm not sure it was given to me.

17 **Q.** Having read it now, is it not a document that you
 18 recognise?

19 **A.** I don't recognise it.

20 **Q.** Can we turn to page 31, please, and it's the bottom
 21 there. I don't know if you've seen me go through this
 22 or anybody go through this with other witnesses but it's
 23 (g):
 24 "A method for posting 'Balancing Transactions' was
 25 observed from technical documentation which allows for

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1 posting of additional transactions centrally without the
2 requirement for these transactions to be accepted by
3 subpostmasters ... Whilst an audit trail is asserted to
4 be in place over these functions, evidence of testing of
5 these features is not available ..."

6 Third bullet point:

7 "For 'Balancing Transactions' ... we did not
8 identify controls to routinely monitor all centrally
9 initiated transactions to verify that they are all
10 initiated and actioned through known and governed
11 processes, or controls ..."

12 The final one:

13 "Controls that would detect where a person with
14 authorised privileged access used such access to send
15 a 'fake' basket into the digital signing process could
16 not be evidenced to exist."

17 Looking at those now, are those matters that you
18 would have expected to have been brought to your
19 attention, given to your involvement in the remote
20 access issue?

21 A. Yes. I mean, the first one there is interesting because
22 it doesn't -- the first one there doesn't say "without
23 the knowledge of the subpostmaster", because -- it says
24 the subpostmaster hasn't got to accept them but it
25 doesn't say without the knowledge of the subpostmaster.

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1 or --

2 A. From reading these emails, yes.

3 Q. Yes, but do you recall it at the time?

4 A. Ah --

5 Q. We have below that the email from Gareth James, which
6 sets out deliverables:

7 "These seek to create a shorter document for you
8 (intended for Board circulation) which focuses on
9 certain key (and most relevant) aspects of our wider
10 work to date."

11 Could we please turn to POL00346396. There is then
12 on that page we see an email from you to Paula Vennells:

13 "Paula do you want this to go to the Board this
14 evening as written by Chris, or should it wait until he
15 has answered the questions in the morning."

16 She says:

17 "We should certainly [refer to the] pre/post as
18 otherwise it will look like we've forgotten it."

19 Do you recall an issue relating to, I think, Legacy
20 Horizon and Horizon Online --

21 A. Yes, yes.

22 Q. -- and not enough detail on that issue?

23 A. Yes, because Deloitte were, in fact -- I think they'd
24 been asked to do two -- to do one report but then tell
25 us how they -- whether they were able to and how much it

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1 So I believed at this point that the subpostmaster could
2 see everything in their account, every -- you know, like
3 I spoke about earlier, keystroke, every transaction and,
4 even if they were sent a transaction correction and --
5 the process changed because they used to have to accept
6 them, even if they were sent them and now we don't have
7 to accept them, they would still see them.

8 That was my understanding at this point. However,
9 I do not remember seeing the long Deloitte report.
10 I remember the Board summary, which came to the Board at
11 a later date.

12 Q. That's what I would like to ask you about, that summary,
13 and the way that that was drafted. Could we please turn
14 to POL00346391, page 2 and into page 3. You're copied
15 in here, an email from Chris Aujard to Paula Vennells
16 and others.

17 "Dear all -- Following the 2 longish calls that
18 I have had with Deloitte today, they have now come back
19 in the email below with a revised statement of the
20 'deliverable' that they are proposing to produce for us
21 ... If the general consensus is this is okay, I would
22 propose to ask Alwen to circulate the email to the Board
23 with following message from me ..."

24 Do you recall a process by which Deloitte were going
25 to be drafting effectively a summary of the report,

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1 would cost to do a report on Legacy Horizon.

2 Q. Thank you. Could we turn to POL00346406, this is a very
3 early in the morning email from Chris Aujard, 30 May --
4 you're copied in -- to Gareth James at Deloitte:

5 "We have discussed at some length the need to
6 provide as much comfort as possible in respect of the
7 period prior to 2010. For clarity, could you kindly
8 confirm that you still propose to do this?

9 "2) On the question of the audience for the
10 document, this is principally the Board in the first
11 instance; as discussed we will however, want to be able
12 to use any high level conclusions you may reach as
13 a foundation for the release of the Linklaters advice --
14 at this stage we are not sure what form we would need
15 your conclusions to be expressed in ...

16 "3) The proposed timings do not work ... for us ..."

17 It seems as though there was some anger towards
18 Deloitte about the time that it was all taking; is that
19 correct, was that your recollection?

20 A. Yes, yes, sorry.

21 Q. I'll summarise, really, where we get to from there.

22 There is then produced the summary for the Board and the
23 summary does not set out the information that I've taken
24 you to before about remote access.

25 A. Okay.

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1 Q. Do you recall the summary being provided and any
 2 discussions about how that summary would be drafted and
 3 whether it should or shouldn't include more detail or
 4 detail about remote access?
 5 A. I don't recall that and I haven't seen any papers that
 6 suggest I'm part of that conversation.
 7 Q. Thank you. I'm going to move on now very quickly to the
 8 Swift Review. Could we please bring up on screen
 9 POL00153835. We're on 18 December 2015, an email from
 10 Mark Underwood to you. Over the page, please, or down
 11 to the bottom, and the top of page 2. There we go.
 12 "Hi Alwen,
 13 "Thank you for providing Patrick with the minutes
 14 for the Sparrow Sub Committee meetings and the extracts
 15 from other Board meetings relevant to Sparrow. I will
 16 forward these on to Jonathan Swift QC this afternoon.
 17 As one would expect, numerous papers and reports are
 18 cross-referenced in these minutes."
 19 Can you recall assisting with the provision of
 20 information to Jonathan Swift?
 21 A. Not specifically but now that I've seen this, yes, I can
 22 recall that.
 23 Q. Can you recall ever reading his report, his ultimate
 24 report?
 25 A. I don't think I ever saw his report.
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1 Sorry, it's at that meeting, in fact, that:
 2 "The CEO explained that the decision not to
 3 prosecute agents if they could use the Horizon system as
 4 a defence would be reconsidered once Deloitte had
 5 completed their work on Horizon and could be used in
 6 court as an expert witness."
 7 Was this also the meeting at which you retired?
 8 Yes, if we go over to page 7, so at that same meeting
 9 where there was discussion about not prosecuting agents,
 10 it has "Resignation and Appointment of the Company
 11 Secretary". Can you briefly assist us with the reasons
 12 for your retirement --
 13 A. So they were --
 14 Q. -- or resignation --
 15 A. -- personal reasons because we'd had two bereavements in
 16 the family, close family, and one very ill person in my
 17 close family, and I needed to be at home supporting
 18 them, rather than commuting up to London.
 19 MR BLAKE: Thank you.
 20 Sir, those are all of my questions. There are some
 21 questions from Mr Jacobs and also from Ms Shah on behalf
 22 of the National Federation of SubPostmasters.
 23 SIR WYN WILLIAMS: All right.
 24 MR BLAKE: Shall we start with Mr Jacobs.
 25 Questioned by MR JACOBS
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1 Q. Did you ever discuss his report or the drafting of his
 2 report with any senior executives at the Post Office?
 3 A. No.
 4 Q. Would a report of that nature be something that you
 5 would expect to know about or to be told about, or to
 6 read?
 7 A. So can I just clarify, is this the report that Tim
 8 Parker, when he became Chairman, was asked to --
 9 Q. Yes.
 10 A. So I never saw this report and I don't remember Tim
 11 Parker ever sharing that report with the Board.
 12 Q. So you were, to some extent, involved in the provision
 13 of information?
 14 A. Yes.
 15 Q. Do you remember any other involvement, other than that?
 16 A. No.
 17 Q. Did you ever discuss it with the Chair?
 18 A. So I believe the Chair made it very clear that he'd been
 19 asked to do this independently and, therefore, there was
 20 no discussion about it.
 21 Q. Thank you.
 22 Very finally, your resignation. Could we just turn
 23 to POL00021549. 25 July 2017, we have a Board meeting
 24 and it's at page 4:
 25 "(e) The CEO explained that the decision ..."
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1 MR JACOBS: I'd like to take you to a document, please,
 2 POL00058155.
 3 While that's waiting to come up, I should tell you
 4 I represent a large number of subpostmasters,
 5 subpostmistresses and assistants who were affected by
 6 this scandal and are represented by Howe+Co.
 7 So this is a document about a story, and all will be
 8 made clearer. Could we go, please, to page 2 of 3 at
 9 the bottom of that page. It's an email from Hugh
 10 Flemington -- if we could scroll down -- 24 July 2012 to
 11 Susan Crichton, you and Simon Baker:
 12 "This the story text which J put together [and we
 13 can see that 'J' is Jarnail Singh] following our meeting
 14 last week. Any comments, please, before we release it?"
 15 So the story from Mr Singh is entitled "Second Sight
 16 Review Draft". To summarise it, the first paragraph
 17 says that Post Office are going to undertake a review;
 18 second paragraph says Second Sight are going to be
 19 instructed and it will focus on cases raised by Members
 20 of Parliament, and that JFSA want their own forensic
 21 accountant to monitor the work of Second Sight, that
 22 accountant is Kay Linnell.
 23 But I want to focus on the third paragraph, please,
 24 so if we could maybe highlight that. I'll read:
 25 "All of the above is accepted based on the terms of
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1 the Review being carried out, but it must be stressed
2 that this is not an acknowledgement by the Post Office
3 Limited that there is an issue with Horizon. The
4 Horizon system is working properly, robust and is being
5 used up and down the country ..."

6 Then importantly:

7 "... when the system has been challenged in the
8 criminal courts, it has been successfully defended."

9 I want to ask you about that last statement, "When
10 the system has been challenged in the criminal courts it
11 has been successfully defended", and what I want to
12 suggest is that that is not true; would you agree?

13 A. So, at this point, I would have -- as Mr Singh is the
14 criminal lawyer, I would have accepted that that what he
15 was telling me was the truth.

16 Q. You would have accepted that it was or wasn't true?

17 A. Was the truth at that point because he's telling me that
18 this is what's happened in the criminal courts.

19 Q. Well, were you aware that Suzanne Palmer, who is
20 a client who we represent and who was one of the case
21 studies in an earlier phase of this Inquiry, had been
22 acquitted by a jury in Southend Crown Court in January
23 2007, and she had asserted in her defence that the
24 Horizon system had prevented her from challenging any
25 Horizon figures which she hadn't agreed. There had

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1 not only attended the hearings, attended those trials,
2 they gave evidence against our clients and they were
3 present when the jury delivered their verdict. Is that
4 not something that you knew?

5 A. No.

6 Q. Did you consider, or did Ms Crichton consider, or did
7 Mr Baker consider, that it would have been appropriate
8 before accepting this statement or putting this out that
9 there should be some fact checking that went on?

10 A. Absolutely. I would have expected -- if there was any
11 doubt in this last sentence here from Mr Singh, I would
12 have expected other members of the Legal Team to
13 challenge that, either Mr Flemington or Ms Crichton, and
14 to say this is not a correct statement.

15 Q. Well, if we could just go up to page 2 of 3 at the
16 bottom, please, so just scrolling up slightly, you will
17 see that you wrote an email to Simon Baker, and it says:

18 "Simon can you go to Alana with this request for the
19 'story' [Post Office's story] as they are the experts."

20 Who was Alana?

21 A. Alana was Mark Davies' deputy in the Communications
22 Team.

23 Q. Okay. Why did you call it the "story" with speech
24 marks?

25 A. So I'm referring to what Mr Flemington said further down

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1 been, at her trial, a jury question directed at the Post
2 Office to the effect of "What is Mrs Palmer supposed to
3 do if she didn't agree it or doesn't agree with the
4 figure that Horizon produced?", and the Post Office had
5 been unable or unwilling to answer that question. So
6 an acquittal in relation to a subpostmistress who
7 challenged the Horizon system in January 2007. Quite
8 a significant event.

9 A. Yes.

10 Q. Is that something that you were aware of?

11 A. So I don't believe I was aware of that.

12 Q. Okay. Moving on, and you may give the same answer, but
13 I need to put it to you. Also in 2006, in Northern
14 Ireland, in Dungannon court, Maureen McKelvey, another
15 one of our clients, was acquitted by a jury and, in her
16 trial, it came to light that an Area Manager had
17 experienced problems with balancing on the Horizon
18 system at Ms McKelvey's branch terminal and she had
19 maintained, right from the start, that the losses that
20 were alleged were due to errors on the computer system.
21 Is that something that you knew about?

22 A. Not that I remember, no.

23 Q. Now, the Inquiry -- you may or you may not know this --
24 has heard evidence from the Post Office Investigators in
25 both of those cases, Ms Allan and Ms Winter, and they

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1 in the email and I'm not reading anything else into that
2 at this point.

3 Q. Okay, well, if we could move up, then, after your
4 request Mr Baker wrote to Alana Renner, copying you in
5 with Mr Flemington and Ms Crichton:

6 "Please can help us craft our message around the
7 Second Sight review. We need to combat the assertion
8 that the review is acknowledgement that there is
9 a problem with Horizon.

10 "Jarnail has drafted some words below. Do they
11 strike the right tone?"

12 So what we see here is the purpose of the story is
13 to stop anyone saying that Post Office are acknowledging
14 that there's a problem with Horizon.

15 A. I think it's important here that, in the Second Sight
16 review, Horizon was used as a more generic term than
17 just the computer. So here I don't know if Simon is
18 saying problem with Horizon as the computer, rather than
19 the wider Horizon. Clearly, the wider Horizon is also
20 very important.

21 Q. Okay. If we could then scroll up to the next email,
22 which is Ronan Kelleher, 27 July 2012 at 11.27, so he
23 writes to Simon Baker, you're copied in again, and he
24 says:

25 "As this message will most probably find its way

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1 into the media, we need to get the message across from
2 the start that we continue to have full confidence in
3 the robustness of the Horizon system and ... I suggest
4 the following tweaking to the proposed wording from
5 Jarnail."

6 If you scroll down to the bottom of that letter, the
7 "tweak", so to speak, and then you can see the final
8 sentence; it's not part of a sentence, it's a sentence
9 on its own:

10 "When the system has been challenged in criminal
11 courts, it has been successfully defended."

12 So the expert, as you put it, looked at this, looked
13 into this and, when it was came back and it was given
14 a sort of final draft treatment, that sentence remained,
15 didn't it?

16 **A.** Yes, and that's appalling.

17 **Q.** Then, going up to the top, then, we've got -- or the
18 second from the top email:

19 "Ronan

20 "That works. Thanks.

21 "Simon."

22 So everything seems to be fine with that. Then the
23 last email in the chain, which was Jarnail Singh to Hugh
24 Flemington, there's been some redaction there but we can
25 see your name and --

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1 known. Whether Mr Singh knew, I don't know. But, you
2 know, you would have imagined that the lawyers on this
3 email chain would have known about the prosecutions
4 brought against subpostmasters.

5 **Q.** Thank you. The date of this, 31 July, you were the
6 Company Secretary at that point, weren't you?

7 **A.** I was.

8 **Q.** Did you present the story or show the story to the
9 Board?

10 **A.** I cannot remember doing so but I may have shared it with
11 Alice.

12 **Q.** Okay. I'm just going to see if I have any more
13 questions.

14 Finally, can you explain why it was called "our
15 story" in inverted commas?

16 **A.** I think it's because right at the beginning of the
17 email, Hugh Flemington unfortunately calls it a "story"
18 and that's continued all the way up the email, and
19 I think that's why.

20 **Q.** So it's a deliberate use of words, isn't it?

21 **A.** Yes, it's deliberate in this email but, in terms of "our
22 story", I think it's just saying what's -- what do the
23 Post Office want to say about this? That's ...

24 **MR JACOBS:** I have no further questions. Thank you.

25 **THE WITNESS:** Thank you.

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1 **A.** Yeah.

2 **Q.** -- Susan Crichton's name:

3 "Dear Hugh, Susan Alwen

4 "You have seen the final draft of 'our story' can
5 this now be released to our agents and counsel for
6 consistent approach and submissions when there is
7 [I think that's probably a typing mistake]

8 "Challenges to the Horizon.

9 "Regards

10 "Jarnail."

11 So the question I wanted to ask you is who are "our
12 agents" who this was going to go out to?

13 **A.** I don't know who he means by "our agents", unless its
14 subpostmasters.

15 **Q.** So other subpostmasters?

16 **A.** Yes, that is what I'm assuming but --

17 **Q.** Then, perhaps more troubling, this was going to go out
18 to counsel. Surely that means that this was going to be
19 used by barristers in cases against subpostmasters?

20 **A.** Well, that's why I'm -- I said it was appalling.

21 **Q.** Do you accept, having said that it was appalling, that
22 Post Office knew, must have known, that there had been
23 Horizon acquittals and deliberately put out a false
24 account to cover that up?

25 **A.** So I don't know who, on this email chain, would have

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1 **SIR WYN WILLIAMS:** Thank you.

2 **MR BLAKE:** We have Ms Shah from the NFSP, she's assured me
3 she's going to be seven minutes, and then we have,
4 briefly, Ms Patrick as well.

5 **SIR WYN WILLIAMS:** Right, okay.

6 **Questioned by MS SHAH**

7 **MS SHAH:** Good afternoon, Ms Lyons, can you hear me?

8 **A.** I can, yes.

9 **Q.** I represent the NFSP at this Inquiry. I'm going to be
10 remembering to sections of your witness statement but
11 this does not need to be brought up unless you wish to
12 review these sections.

13 So we saw in your witness statement that your
14 parents ran a sub post office and I think that your
15 father was also a previous General Secretary of the NFSP
16 from 1980 to 1991; is that correct?

17 **A.** That's correct, yes.

18 **Q.** In paragraphs 32 and 33 of your witness statement, you
19 describe your role as including the disciplining of
20 subpostmasters. This Inquiry has heard a great deal
21 about the overzealous, aggressive and intrusive way in
22 which audits and investigations were carried out with
23 an attitude of guilty from the outset, terminology used
24 such as "offender reports"; in fact you would have been
25 part of that way of working, wouldn't you?

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1 **A.** No, I don't believe so. I mean, I had no part of the
 2 investigation procedures or -- I was the Area Manager or
 3 the Retail Network Manager between '91 and '95, as you
 4 say in paragraph 32. I spent most of my time trying to
 5 help subpostmasters and support them. If something
 6 happened, which meant that there was an issue at
 7 an office, I believe that I would approach things in
 8 an even-handed way and would have listened to the
 9 subpostmaster as well as listening to investigation or
 10 whatever.
 11 **Q.** So you wouldn't accept that, given that we have heard
 12 about this culture of guilty until proven innocent,
 13 that, given your family background in a sub post office
 14 and the family background in the NFSP, there is not much
 15 empathy being shown in this disciplining of
 16 subpostmasters when you were in your role?
 17 **A.** So I'm saying that I don't agree with you in terms of my
 18 empathy with subpostmasters. In '91 to '95, the
 19 Investigation part of the business was in Royal Mail
 20 Group and that was a very different culture to how we
 21 dealt with subpostmasters and tried to help
 22 subpostmasters during this time. So I would really
 23 disagree that I was heavy-handed with subpostmasters at
 24 all.
 25 **Q.** Okay. At paragraph 49, of your witness statement, you
 201

1 been discussed today, can you describe the differences
 2 in the level of disciplinary action and sanctions
 3 between subpostmasters and Crown Office cases?
 4 **A.** So, at this point, I wasn't dealing with subpostmasters
 5 at all. I believe in the Crown Office cases, if someone
 6 had a loss on the counter, they would be -- I believe
 7 they could have so many losses within so many months of
 8 time. I can't remember specifically but they would
 9 have -- they would get some additional training, maybe,
 10 if they were new or -- they would have support because,
 11 in a Crown Office, you've got a branch manager standing
 12 there who can be helping them with any issues on the
 13 counter.
 14 **Q.** So are you aware of the reason for the differences
 15 between Crown Office staff who are employed and
 16 self-employed, small business people, as to the level
 17 and attitude towards disciplinary action and/or
 18 sanctions?
 19 **A.** So they were on a very different contract, so that's why
 20 it was different: one was an employee and one was
 21 an agent.
 22 **Q.** So would your evidence be that it's nothing to do with
 23 the ability to recovery funds from subpostmasters?
 24 **A.** I don't believe it was.
 25 **Q.** Okay. At paragraph 360 of your witness statement you
 203

1 talk about your role as Head of Directly Managed
 2 Branches. What was taking place during that time with
 3 the disciplining and/or prosecutions of Crown Office
 4 personnel?
 5 **A.** So it was a very different regime because they were
 6 employees not agents and there was an HR process, which
 7 meant that, if someone at an office -- there was
 8 a problem with someone in a Crown Office, then they
 9 would be part of the -- they're employees so they would
 10 be dealt with very differently than subpostmasters.
 11 **Q.** How about prosecutions?
 12 **A.** I can't remember any prosecutions but I might have --
 13 I might have misremembered that but I can't remember any
 14 prosecutions specifically about Horizon issues.
 15 **Q.** In your role, what discussions did you have with unions
 16 who represented Crown Office employees about the
 17 approach to disciplining and prosecutions, albeit you
 18 can't remember any prosecutions regarding Horizon
 19 specifically?
 20 **A.** So I had a lot of discussions with the CWU about the
 21 people issues and trying to work with them, actually, to
 22 try and make sure that our people were looked after as
 23 well as, you know -- so I had lots of discussions with
 24 the CWU.
 25 **Q.** So, from your knowledge in your various roles which have
 202

1 say that your pride in working for the Post Office is
 2 now tainted by what has happened. Do you not understand
 3 or accept your own either active or passive role in what
 4 has happened?
 5 **A.** Yes, I do understand that. That's why my 34 years at
 6 the business, which I was very proud of when I left, is
 7 tainted, and it's very difficult because, you know,
 8 something that you are very proud of like that, it's
 9 suddenly not right to be proud of it any more.
 10 **Q.** Would you accept that, given your family background in
 11 a sub post office and your family background in the
 12 NFSP, it might be said that you took the saying "poacher
 13 turned gamekeeper" to the extreme?
 14 **A.** I find that quite offensive, actually. My family
 15 background, I think, enabled me to understand some of
 16 the issues that subpostmasters were going through and,
 17 at no point, did I think I was, you know, "poacher
 18 turned gamekeeper". I believe that, through all my
 19 career, I did a lot to help subpostmasters.
 20 **MR BLAKE:** Thank you, sir. It's Ms Patrick.
 21 **SIR WYN WILLIAMS:** Is that it, Ms Shah?
 22 **MS SHAH:** I've got a few more short questions, sir. Sorry.
 23 Would you accept that you shut your mind to the
 24 consequences of everything you knew and ought to have
 25 taken further and that directly or indirectly led to
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1 subpostmasters being wrongly prosecuted?

2 **A.** So in hind --

3 **SIR WYN WILLIAMS:** I don't think the witness can answer that

4 because she wasn't in any relevant post at any relevant

5 time to this Inquiry when people were being prosecuted.

6 **MS SHAH:** Okay, sir.

7 Okay. Would you agree that your actions, directly

8 or indirectly, led to organisations and unions such as

9 the NFSP and the CWU being misled to keep their concern

10 to a minimum and avoid them putting their support behind

11 the JFSA?

12 **A.** So I don't believe my actions did that. I believed that

13 I was acting in good faith. I believed that -- the

14 information I was given from experts within the business

15 and I relied on that information. If I had a regret,

16 it's that I relied on information from people who

17 I considered to be experts without demanding more proof.

18 **MS SHAH:** That concludes my questions. Thank you.

19 **SIR WYN WILLIAMS:** Thank you, Ms Shah.

20 Ms Patrick.

Questioned by MS PATRICK

22 **MS PATRICK:** Thank you, sir.

23 Ms Lyons, my name is Angela Patrick. I represent

24 a number of subpostmasters who were convicted and have

25 since had their convictions overturned.

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1 long -- sorry, scroll down. You say:

2 "Dear All,

3 "As detailed in the Board update sent last Saturday,

4 please find attached Deloitte's final draft 'Board

5 Briefing', received by us late this afternoon."

6 As you go down, it talks about:

7 "... features of the Horizon system which operate to

8 provide subpostmasters with full ownership and

9 visibility of their branch ledger, and which maintains

10 a complete and accurate audit trail."

11 The next paragraph:

12 "The briefing strives to be succinct and

13 intelligible. However, given the subject matter and

14 scope of the review, it remains somewhat technical."

15 There are some bullet points which provide

16 a summary. We don't need to go to those for now but

17 I just want to ask you one question.

18 You circulate this message with the attachment and

19 the summary to the Board. Now, you've said you didn't,

20 in April and May, read the Deloitte report, the original

21 version, and I think your evidence is that, until you

22 were shown it by the Inquiry, you hadn't seen the

23 original report; is that right?

24 **A.** That's my belief, yes.

25 **Q.** So you wouldn't have checked this summary accurately

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1 You might be glad to hear I've only got one document

2 I want to ask you about and it's about the Deloitte work

3 that Mr Blake has already asked you about. He's asked

4 you about April and May in the minutes in 2014. I want

5 to look at one document which comes a little after that,

6 which is POL00029733. If we could look at the bottom

7 third of page 1, I'd be grateful.

8 We can see there, at the very bottom third of that

9 page, we see an email from you, Ms Lyons. Can you see

10 that?

11 **A.** Yes.

12 **Q.** It's dated 4 June 2014. I don't need to read those

13 names but do you accept that's the Board?

14 **A.** Yes.

15 **Q.** So it's a message from you to the Board and it's

16 forwarding, and we see the header there, "Deloitte

17 Briefing -- Message from Chris Aujard and Lesley

18 Sewell", and it's marked, "Strictly Private and

19 Confidential -- Subject to Legal Privilege".

20 The message says you're forwarding a message from

21 Chris Aujard and Lesley Sewell and you attach the

22 Deloitte briefing.

23 Just for fullness, if we scroll up a little, we can

24 see the message. It goes over on to page 2, as well.

25 We don't need to read it all out because it's quite

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1 reflected the original?

2 **A.** No, because I wouldn't be able to do so.

3 **Q.** You don't recall asking to see the original at this

4 time?

5 **A.** No, I don't recall asking.

6 **Q.** I just want to ask you and to check whether this helps

7 your memory on who might have completed the summary for

8 the Board and helped with the Deloitte summary; now was

9 it Mr Aujard and Ms Sewell who would have asked you to

10 circulate this message?

11 **A.** Can we keep going down for a minute to see who the

12 signatory --

13 **Q.** Of course.

14 **A.** Yes. So this message has come from Lesley and Chris and

15 that's who I am circulating it on behalf of. Now, that

16 doesn't mean I didn't check with someone before I did

17 that. So I might have checked with Paula, for instance.

18 It doesn't look as if I checked with Alice. So we were

19 expecting this update from Lesley and Chris, so I'm

20 circulating it on their behalf.

21 **Q.** Okay. If we scroll up to the very top of this document,

22 we see that you circulate it separately to Rodric

23 Williams. Can you see that there, at the top?

24 **A.** I can, yes.

25 **Q.** You say:

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1 "Sorry should have cc'd you in as you did all the
2 work!"
3 Now, you're circulating a message from Mr Aujard and
4 Lesley Sewell. Can you remember now which of both of
5 them might have asked you to circulate the document?
6 **A.** No, I can't.
7 **Q.** You're forwarding it to Mr Williams, saying:
8 "... should have cc'd you in [because, essentially]
9 you did all the work!"
10 Does that help your memory on who was involved in
11 the preparation of the final summary for the Board with
12 Deloitte?
13 **A.** So Rodric was a lawyer and I am reading into this now
14 that he had the connection with Deloitte and that he
15 was -- and so I would have said it was Chris Aujard but
16 that's only because I'm saying here that Rod, a lawyer,
17 did all the work.
18 **MS PATRICK:** Thank you, Ms Lyons. That's all the questions
19 we have for you.
20 **SIR WYN WILLIAMS:** Is that it, Mr Blake?
21 **MR BLAKE:** It is, yes. Thank you, sir.
22 **SIR WYN WILLIAMS:** Well, thank you very much, Ms Lyons, for
23 producing a detailed witness statement and for coming to
24 the Inquiry today to answer very many questions. I'm
25 grateful for your participation.

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1 **A.** Thank you.
2 **SIR WYN WILLIAMS:** So we'll resume tomorrow morning with
3 Ms Vennells, I take it?
4 **MR BLAKE:** That's correct, sir, yes.
5 **SIR WYN WILLIAMS:** Jolly good. Thank you.
6 **(4.28 pm)**
7 **(The hearing adjourned until 9.45 am the following day)**
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