

Friday, 26 July 2024

1
2 (9.45 am)
3 **MR STEVENS:** Good morning, sir. Can you see and hear me?
4 **SIR WYN WILLIAMS:** Yes, thank you.
5 **MR STEVENS:** Sir, we are hearing from Allan Leighton today
6 and, as you will remember, but for the benefit of those
7 watching, Mr Leighton gave oral evidence to this Inquiry
8 on 17 April of this year and, on that occasion,
9 Mr Leighton confirmed the accuracy of his witness
10 statement, subject to one minor correction. The Unique
11 Reference Number for that statement is WITN04380100.
12 The statement and the transcript of Mr Leighton's oral
13 evidence is available on the Inquiry's website.
14 We weren't able to conclude his oral evidence on
15 17 April and I stress that was through no fault of his,
16 and Mr Leighton has agreed to the Inquiry's request to
17 re-attend to answer further questions today.
18 With that in mind, sir, unless you wish to say
19 anything I would ask that Mr Leighton be sworn in?
20 **SIR WYN WILLIAMS:** No, that's fine.
21 **ALLAN LESLIE LEIGHTON (re-sworn)**
22 **Questioned by MR STEVENS**
23 **MR STEVENS:** Thank you, Mr Leighton. Thank you for
24 attending the Inquiry again to complete your oral
25 evidence. I want to start by recapping on some of your
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1 structures are in place to enable any issue in the
2 business to be raised up the organisation. And,
3 therefore, you've got -- you have the, you know, the
4 Executive Management Team who are responsible do that.
5 You've got all the meeting structures from the POL Board
6 to the Royal Mail Board to the Audit and Risk Committee,
7 to the subcommittees of all those organisations, to the
8 Management Boards of those organisations that move all
9 the time and, over time", and then you go on to talk
10 about Have Your Say.
11 Do you remember giving that evidence?
12 **A.** Yes.
13 **Q.** Could we please then turn to page 38, A4-page 38, and
14 then internal page 152, please, at the bottom, line 7.
15 I asked:
16 "What is the Non-Executive Director or Non-Executive
17 Chairman's role in respect of risk management?"
18 Your answer says:
19 "To make sure that the processes are in place that
20 enable that to happen, in terms of risk management,
21 Audit and Risk Committee obviously are a big part of
22 that, but also a lot of risk doesn't just come through
23 the Audit and Risk Committee, it comes from the
24 day-to-day interface you have with people. So the most
25 important thing is to have some set processes, to make
3

1 oral evidence from the last hearing and so if we could
2 please bring up the transcript of that, it's
3 INQ00001131. While that's coming up, I will say that
4 I will use two pages references when referring to the
5 transcript, one the A4-page reference for the purposes
6 of our document management system and then the internal
7 page reference as well.
8 So if we could first, please, turn to page 32,
9 that's A4-page 32, and at internal page 126, we see
10 there your evidence begins, your oral evidence. Please
11 can we look at A4-page 35 and at internal page 138,
12 line 22, this follows a question I asked about Post
13 Office Limited issues. I asked:
14 "With hindsight, should added to that list be
15 prosecutions of subpostmasters and oversight of
16 prosecutions of subpostmasters?"
17 If we could go down the page, please, to page 139,
18 we don't need to read the whole of it but part of your
19 answer was:
20 "Non-execs are called non-execs because they don't
21 execute; executives are called executives because they
22 do execute."
23 That's at line 11, sorry.
24 Then carrying on from line 13:
25 "So our role, I think, really is to make sure the
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1 it clear where the responsibility lies and, again,
2 I think you can see, certainly in the Royal Mail pieces
3 of the report and accounts, that there were -- you know,
4 risk management was built up from the bottom of the
5 organisation."
6 Again, do you recall giving that evidence?
7 **A.** Yes.
8 **Q.** So I think, summarising your evidence, is that
9 a non-executive had responsibility to see that
10 appropriate reporting structures were in place in the
11 group or business?
12 **A.** That's right.
13 **Q.** Would that include a responsibility to see that there is
14 appropriate oversight of the group's operations?
15 **A.** Absolutely.
16 **Q.** Can we turn, please, to page 40. I should say
17 A4-page 40. Then at internal page 159, line 13,
18 I asked:
19 "Well, when was the first time that you were aware
20 that subpostmasters were prosecuted for those offences
21 by a Royal Mail Group --"
22 I think I was going to say "company". You answered:
23 "When I joined the organisation".
24 At internal 160, line 3, it says:
25 "Were you aware that the decision of whether to
4

1 prosecute someone or a subpostmaster, was made by
 2 a Royal Mail Group company?"
 3 You answered:
 4 "Yeah."
 5 Then at line 7:
 6 "Were you aware that the prosecution was conducted
 7 by a Royal Mail Group company?"
 8 You answered:
 9 "Yes."
 10 Again, do you recall giving that evidence?
 11 **A.** Yes.
 12 **Q.** Page 41, please -- thank you -- and down to internal
 13 page 163. At line 6 I asked:
 14 "So you were aware of the prosecutions. Were you
 15 aware that prosecutions of subpostmasters relied on data
 16 generated by the Horizon IT system?"
 17 **"Answer:** I'm not acutely aware of it but it would
 18 be obvious that it would be because, obviously, that was
 19 the EPOS system of the branches.
 20 **"Question:** On an operational level, who or which
 21 team did you think was responsible for investigating
 22 suspected theft, fraud or false accounting on the part
 23 of subpostmasters?
 24 **"Answer:** Again, I can't recall exactly but I would
 25 say it was in that sort of Security/Legal area of the

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1 **"Question:** So within Group in Legal?
 2 **"Answer:** Yes.
 3 **"Question:** Who did you think was responsible for
 4 the conduct of those prosecutions? Would that be legal
 5 again?
 6 **"Answer:** Yes, I think so."
 7 I think it's fair to say that those were all matters
 8 that you -- your evidence is you knew those at the time
 9 you were chairing; is that right?
 10 **A.** Sorry, could you repeat that?
 11 **Q.** Is your evidence that you knew those matters, which
 12 we've just gone through, at the time you were Chairman?
 13 **A.** Largely, yes.
 14 **Q.** When you say "largely", what matters do you think you
 15 weren't aware of when you were Chairman?
 16 **A.** I mean, some of the detail, I would think, I was -- I'd
 17 need to go back over things but, largely, I would have
 18 been aware of all those things when I was Chairman.
 19 **Q.** Can we look, please, at A4-page 42 and then internal
 20 page 165, line 1. It says:
 21 "Were these matters actively on your mind at the
 22 time when you were running the company?"
 23 **"Answer:** Not at all.
 24 **"Question:** Why not?
 25 **"Answer:** Because, obviously, there were many other

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1 business.
 2 **"Question:** So we have the Security Team. Where did
 3 you think the Security Team sat in the reporting line
 4 within the group?
 5 **"Answer:** Again, I can't -- I don't know exactly
 6 because I haven't seen the organograms but I think my
 7 recollection is that they worked into the Legal teams
 8 and that they all worked into the Company Secretary.
 9 **"Question:** So the Legal Team, where did the Legal
 10 Team sit?
 11 **"Answer:** Again, I'm not 100 per cent sure but
 12 I think it reported into the company secretary.
 13 **"Question:** The company secretary of which company?
 14 **"Answer:** Of Royal Mail Group.
 15 **"Question:** So Legal was a group function?
 16 **"Answer:** I'm pretty -- yes, I think so, yeah."
 17 Again, do you recall giving that evidence?
 18 **A.** Yes.
 19 **Q.** Then, actually, line 16 as well, please, of internal
 20 page 164.
 21 **"Question:** Again, at the operational level, who did
 22 you think was responsible for the decision as to whether
 23 or not to prosecute a subpostmaster?"
 24 **"Answer:** I would have -- again, I'm not -- I have
 25 to say within the Legal Team.

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1 things that were being addressed both --", and you go on
 2 to say what those were.
 3 Just to clarify this, what is you're saying is that
 4 you knew, as you say, largely the overview of what I've
 5 just been through but it's not something that you
 6 actively thought about when you were Chairman as to how
 7 the process worked?
 8 **A.** Absolutely.
 9 **Q.** We then turned in your evidence to look at the oversight
 10 of prosecutions at the group level. I don't need to go
 11 through the entire transcript for that. I'll take you
 12 to one part. It's A4-page 44, please and internal
 13 page 73, at line 25. I asked:
 14 "Let's take it in charges. You say that Jonathan
 15 Evans, the Company Secretary, that's the line of report
 16 for Legal?
 17 **"Answer:** That's what I think. I'm not 100 per
 18 cent, as I said to you.
 19 **"Question:** You said earlier you thought the
 20 decision to prosecute and the investigation of offences,
 21 responsibility for that lay with Legal --
 22 **"Answer:** Yes.
 23 **"Question:** -- at Group level?
 24 **"Answer:** Yes.
 25 **"Question:** We see that the Audit and Risk Committee

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1 of the Royal Mail Holdings Group are exercising
2 oversight of the prosecution of offences affecting Royal
3 Mail, yes?

4 **"Answer:** Yes, but their oversight is on the Royal
5 Mail and POL and Parcels. The Royal Mail Audit
6 Committee's oversight is across all of the elements of
7 the business.

8 **"Question:** Yes, so that's my question. Why, in
9 those circumstances, was the Audit and Risk Committee
10 not exercising the same type of oversight as we see here
11 in respect of prosecution of crime that was affecting
12 Post Office Limited?

13 **"Answer:** That I don't know."

14 Is it fair to summarise your evidence as this: that
15 the Royal Mail Board in practice did not exercise
16 oversight of the prosecutions of subpostmasters?

17 **A.** That's correct.

18 **Q.** You couldn't give us an answer to why that was at the
19 last time?

20 **A.** That's correct.

21 **Q.** Can you give us an answer today?

22 **A.** No, I mean, I -- it's the same thing. Obviously, at the
23 Audit Committee, as you saw, some of these issues were
24 discussed. But it seems it would largely be a cost of
25 to Royal Mail, and so at no stage really was there any

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1 **A.** None at all.

2 **Q.** So during your time as Chairman, is it the case that you
3 did not discuss prosecutions of subpostmasters with
4 anyone?

5 **A.** As far as I can recall, yes.

6 **Q.** If we could please look back at your statement, page 23,
7 paragraph 45. You say:

8 "As a general matter, my role as Chairman and
9 [Non-Executive Director of Royal Mail Holdings] was one
10 which involved overseeing and advising on the strategic
11 objectives of [Royal Mail Holdings]."

12 Pausing there, you were also a Non-Executive
13 Director of Post Office Limited?

14 **A.** Absolutely.

15 **Q.** "Where issues were raised to Board level, I would seek
16 to take an active role in discussing and probing the
17 best course of action. Since the litigation was taking
18 place within [Post Office], as with other companies with
19 whom I have worked over the years, I would have expected
20 the Board of [Post Office] to be kept up-to-date with
21 key litigation ongoing in the company."

22 What did you mean by "Since the litigation was
23 taking place within Post Office Limited"?

24 **A.** That the -- that that's where the interface was.

25 Basically, POL was in charge of the subpostmasters.

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1 information coming up the organisation that this was
2 an issue, or the issue that it was. And therefore,
3 I think that is why it was never really picked up at the
4 Audit Committee.

5 **Q.** Can we look at Post Office Limited's oversight of
6 prosecutions and turn to your statement, please,
7 at page 23, paragraph 44. So you're discussing
8 oversight of legal departments for various other
9 departments, you'll see from the first line.

10 Midway down you say:

11 "I do not recall any discussion during Board
12 meetings of the prosecutions that [Post Office] was
13 pursuing against those [subpostmasters]."

14 Is that relating to all boards, Post Office Limited
15 and Royal Mail Holdings?

16 **A.** Absolutely.

17 **Q.** Does it also apply to any subcommittees of the Boards of
18 either company that you sat on?

19 **A.** As far as I know, yes.

20 **Q.** Do you recall having any discussion with any other
21 member of the Post Office Executive Team about
22 prosecutions?

23 **A.** None at all.

24 **Q.** Do you recall having any such discussion with any other
25 Post Office Non-Executive Director?

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1 Obviously, they're working with Royal Mail Group, who
2 were doing the legal activity, but I'd have expected
3 both -- it to come to the Board of POL and, if
4 necessary, to the Board of the Royal Mail, if there were
5 significant issues in litigation, including litigation
6 against subpostmasters and/or any issues that resolve --
7 that were a cause of that.

8 **Q.** Do you accept that oversight of the legal function in
9 Royal Mail Group was to the Royal Mail Group Board?

10 **A.** It was through the Royal Mail Group Board, yes. But,
11 also, had an interface with the POL Board because POL
12 operationally managed that piece of the business. So
13 I'd see it as a joint responsibility.

14 **Q.** You say that you would have expected the Board of Post
15 Office Limited to be kept up to date with key litigation
16 ongoing in the company, and you go on to say:

17 "Usually this would include litigation which
18 impacted, or had the potential to impact, the strategic
19 objectives of the company. I would not have expected to
20 have been briefed on all litigation, but rather those
21 deemed by the Executive Team to be high cost or have the
22 potential to impact the strategic objectives of the
23 company. Within the business, the responsibility for
24 conducting and overseeing litigation is, in my
25 experience, the responsibility of the company's legal

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1 function."

2 When you say "high cost", are you referring to the
3 legal costs, the risk of -- so what's at stake in the
4 litigation, the amount that's at stake in the
5 litigation, or both?

6 **A.** Both, and impact that it may have on the business, in
7 a negative sense, from either a revenue or a cost
8 perspective.

9 **Q.** When you say "the potential to impact the strategic
10 objectives of the company", what did you mean by that?

11 **A.** Well, any -- I mean exactly that. If there is anything
12 that would affect the strategic impact -- have
13 a strategic impact on the company, from wherever it came
14 from, then I'd expect the Board to be aware of that.

15 And, again, if you look at this particular tragedy,
16 clearly, if there were issues with Horizon in a systemic
17 way, that would not just have a cost impact on the
18 business. It would have a strategic impact on the
19 business, because you would question why we were rolling
20 that system out because it was the backbone of
21 everything that was happening in the Post Office. So
22 Horizon was a major strategic activity within the Group.

23 **Q.** Just looking at the prosecutorial function: reduced to
24 its simplest, this meant that Royal Mail and Post Office
25 would take people to court and, in certain

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1 the prosecutorial process was fair and lawful?

2 **A.** I think the role of the Board in this would be to ensure
3 that there were practices and policies and procedures in
4 place, and that those were taking place, and then would
5 expect to hear where that was not the case.

6 **Q.** So is your evidence that the role of the Board is to set
7 up the process, firstly?

8 Yes, I think?

9 **A.** Yes.

10 **Q.** Secondly, to see that that process is being followed
11 through?

12 **A.** Yes.

13 **Q.** And, presumably as part of that, it's important that
14 people in the management chain know who is responsible
15 for what?

16 **A.** Absolutely, and not just in the management chain: in all
17 of the functions that were interfacing in that activity.

18 **Q.** Is it the Board's responsibility to satisfy itself that
19 people in the management chain and elsewhere, as you
20 describe, knew the remit of their responsibility?

21 **A.** Absolutely.

22 **Q.** I want to look at what was considered by the Post Office
23 Board and/or subcommittees. Could we please start with
24 POL00021483. It's a meeting of the Post Office Limited
25 Board of Directors on 20 August 2003, and we see on the

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1 circumstances, that would lead to sentences of
2 imprisonment; do you agree with that?

3 **A.** Yes.

4 **Q.** You would have known, when you were Chairman, the very
5 serious consequences of a criminal conviction against
6 a subpostmaster?

7 **A.** Yes.

8 **Q.** You would have known of the very serious consequences of
9 a term of imprisonment against a subpostmaster?

10 **A.** Yes.

11 **Q.** In those circumstances, would you agree that the
12 exercise of the prosecutorial function should have been
13 at the forefront of the Board of Directors' minds?

14 **A.** I'm not sure that it should be at the forefront of the
15 Board's mind but it would -- certainly should have been
16 in scope. But I go to the same issue, which we come to
17 all the time here: the issue was that there was nothing
18 coming to the Board from any direction that suggested
19 there was any -- the scale of the activity or some
20 systemic issue in Horizon that was causing that.

21 **Q.** Leaving Horizon to one side, when one of the operations
22 of the company had the potential to lead to terms of
23 imprisonment for members of the Group's workforce, or
24 past members of the workforce, wasn't it incumbent on
25 the Board take proactive steps to satisfy itself that

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1 "Present" side, three up from the bottom, you're listed
2 as being present.

3 Could we turn, please, to page 8. Under "POLB03/69"
4 it refers to Tony Marsh, who "presented a security paper
5 to the Board on behalf of David Miller". If you just
6 have a quick skim of that and let me know when you want
7 to go over the page. I don't need to read it on to the
8 transcript.

9 **A.** Okay to move on?

10 **Q.** Go to the next page, please. That appears to be
11 relating to the security of sub post offices rather than
12 the investigation and prosecution of crime. Is that
13 your recollection of the meeting, if you have one?

14 **A.** Well, it was a long time ago, so I can't recall but way
15 I'd read it, I'd say that that's -- when you read it,
16 that's what it is.

17 **Q.** Can we please look at POL00021485. That's a year and
18 a bit on in the chronology, 13 October 2004. We see,
19 again, three from the bottom of the "Present" list, you
20 are present, and it says, "For POLB04/86 -- 04/97".
21 I assume that means, where the references are in between
22 that number, you're present for the meeting; when it's
23 outside of that number range you aren't there?

24 **A.** Yeah, I can't recall that.

25 **Q.** We see it's up to 97 on the right side.

16

1 A. Yeah.

2 Q. Can we go to page 13, please, so "POLB04/108". So it
3 appears that you wouldn't have been there at this
4 meeting. Would you have read the minutes of the meeting
5 at a later date?

6 A. Yes.

7 Q. It says "Human Resources" and "The Board noted the
8 report":

9 "The Board agreed that in situations where fraud had
10 been perpetrated against the Company, the appropriate
11 Civil Orders would be used immediately and in advance of
12 any criminal proceedings. This would help recovery
13 efforts by ensuring that the assets of those involved in
14 criminal activity were quickly secured. David Miller
15 would verify the current procedures and report back to
16 the Board."

17 Given this is under the Human Resources section, can
18 you assist us with whether this is looking at alleged
19 fraud against the Post Office by its workforce?

20 A. I can't -- I mean, I can't recall that, no.

21 Q. Do you recall this issue being raised or discussed with
22 other members of the Board?

23 A. I've no -- obviously it's a long time ago, so I don't
24 actually recall this. If you ask me to read it,
25 I would -- it's difficult to -- it's difficult to tell

17

1 A. Just that we had no idea of the numbers of prosecutions
2 that were taking place. That was never raised up.

3 Q. What was your understanding of the numbers of
4 prosecutions that were taking place at the time?

5 A. I had no understanding of the amount of prosecutions
6 taking place at the time.

7 Q. Did you at any point ask how many people the Post Office
8 was prosecuting?

9 A. Not in that set of circumstances. There were
10 discussions at Royal Mail Group about the broader number
11 of prosecutions taking place across the group but, to my
12 recall, never a discussion about the number of
13 prosecutions actually taking place in POL itself.

14 Q. Could we look, please, at -- actually, no, before we do:
15 why did you not ask for numbers of prosecutions in
16 relation to Post Office Limited itself and/or
17 prosecutions against subpostmasters?

18 A. Because it was never seen as an issue in the
19 organisation. It was never flagged up as an issue and,
20 frankly, there were so many other things going on,
21 unless it would have been raised, it wouldn't have been
22 picked up. But in -- as you can see, in bits of the
23 Royal Mail Group, or where issues were raised generally,
24 there was a discussion. But this was not a priority at
25 the time, which was a mistake.

19

1 exactly who it's talking about.

2 Q. You weren't aware, around this time, though, of the
3 Board considering the process of prosecutions, is that
4 right?

5 A. Sorry, I don't --

6 Q. So with your -- any conversations you remember with
7 non-executives, it's right that you weren't aware of, or
8 told about, any discussion at Board level about the
9 process of prosecutions?

10 A. About the process of prosecutions?

11 Q. Yes.

12 A. No, I thought you asked a question whether we knew about
13 numbers of prosecutions. Obviously, this talks about
14 the process of prosecutions.

15 Q. Let me rephrase it. I asked you earlier if you were
16 ever involved in discussions about prosecutions with
17 members of the Board, Non-Executive Directors. My
18 question is: are you aware of any discussion at Board
19 level about oversight of prosecutions that occurred when
20 you were not there?

21 A. No. I mean, this is -- I don't think this is about
22 oversight of prosecutions. This is about, when I read
23 this, what happens when there is a recovery required.

24 Q. You mentioned numbers of prosecutions before. What were
25 you going to say about that and your knowledge of --

18

1 Q. Is that a mistake because it was a reactive approach to
2 the oversight of the process of prosecutions, rather
3 than a proactive approach of the Board satisfying itself
4 that the prosecutions were being conducted fairly?

5 A. I think it's -- I think it was reactive and -- but
6 I think it's the context of it, which is there's, you
7 know, many, many other things happening in the business.
8 This was not seen as an issue, therefore, there were --
9 you know, there were clearly procedures that should have
10 been taking place. Clearly, there were teams working on
11 this that had the opportunity to flag this up, and it
12 didn't happen, and it didn't happen not just in the
13 organisation; it wasn't flagged up by -- you know, from
14 the National Federation of SubPostmasters. You name it,
15 this was never brought up as a significant issue, and
16 Boards tend to react to significant issues.

17 Q. Can we please look at POL00021486. It's a meeting on
18 15 September 2024 of the Post Office Limited Board. If
19 we go down, we see you're not in attendance but, as
20 you've said before, you would have read the minutes?

21 Can we turn, please, to page 6.

22 When I asked "you would have read the minutes",
23 I think you nodded?

24 A. Yes.

25 Q. Yes.

20

1 A. Sorry.

2 Q. Thank you. We have an entry about the "Risk and
3 Compliance Committee". It says:
4 "Peter Corbett provided a short presentation on to
5 highlight the work of the newly formed Risk and
6 Compliance Committee. The Board noted that ..."
7 If we go over the page, please:
8 "The scope of its activity included audit,
9 compliance and legal issues ..."
10 It says:
11 "Its primary aim was to ensure the service and
12 conformance elements of the business were working
13 together properly."
14 That's (d).
15 Then (e):
16 "The next quarterly meeting would be held on
17 5 January 2005 to discuss Branch Control, Vital Few
18 Controls, Audit Reports, Anti-Money Laundering measures,
19 Crime and Fraud and the work of the Group Audit
20 Committee."
21 Do you remember what your understanding was of the
22 remit of the Risk and Compliance Committee within Post
23 Office Limited at this point?
24 A. No, I can't recall that.
25 Q. Did you ever sit on the Risk and Compliance Committee or

21

1 with those people.

2 Q. Would it require input from the Legal Department?
3 A. I would imagine so, yes.
4 Q. Could the Risk and Compliance Committee of Post Office
5 Limited effectively oversee prosecutions if it was not
6 able to oversee the Group Legal function?
7 A. Yes.
8 Q. Why?
9 A. Because it's about information, and the members of the
10 Post Office Audit and Risk Committee, and the MD, and
11 the Chairman of Post Office Risk Committee, sat on the
12 Royal Mail Board.
13 Q. Could we please look at POL00021490. It's another Post
14 Office Limited Board meeting, 14 December 2005. If we
15 go down, please. We see you have given your apologies.
16 Could we turn to page 14, please. Just scroll down
17 slightly, so we see -- that's perfect, thank you.
18 We have the "Risk and Compliance Committee" heading
19 and it says:
20 "The Board noted the Risk and Compliance Committee
21 minutes of 29 September 2005."
22 Would you have read those committee minutes as part
23 of the Board pack, even though you didn't attend the
24 meeting?
25 A. If they were in the Board pack, yes.

23

1 attend it?

2 A. Not as far as I can recall.

3 Q. Sir Michael Hodgkinson gave evidence to this Inquiry, we
4 don't need to bring up his witness statement, but at
5 paragraph 32, he said:
6 "I introduced a Risk and Compliance Committee
7 because the Board was conscious that it would need to
8 have greater corporate governance measures in place,
9 with the progression into financial market, specifically
10 because of the risk of mis-selling financial products."
11 Can you gainsay what Sir Michael says about the
12 purpose of the Risk and Compliance Committee?
13 A. No.
14 Q. Please could we turn to -- actually, before we do,
15 sorry, would this, the Risk and Compliance Committee, in
16 your view, have been a suitable place for oversight of
17 prosecutions to take place -- when I say "oversight of
18 prosecutions", I mean against subpostmasters by the Post
19 Office?
20 A. I could be a place, yes.
21 Q. In order for that to be an effective committee to
22 oversee such prosecutions, what types of attendees would
23 it require?
24 A. Again, largely the people that are on that list, I would
25 imagine. That's why it would have been set up that way

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1 Q. Because it says "the Board noted the minutes", is it
2 likely those minutes would have been in the Board pack?
3 A. Probably, I don't know. I wouldn't be able to comment.
4 Q. Could we look, please, at POL00021418. We see the
5 minutes of the Risk and Compliance Committee on
6 29 September 2005 -- sorry, just getting my copy -- and
7 members, we have Sir Michael Hodgkinson, Peter
8 Corbett -- that was the Finance Director of Post Office
9 Limited; is that right?
10 A. I think so, yes.
11 Q. Rod Ismay, who the Inquiry has heard evidence from.
12 Will he have been in the branch accounting team at that
13 point?
14 A. Again, I couldn't recall that but ...
15 Q. Alwen Lyons, again, we've heard evidence from at the
16 Inquiry.
17 The Secretary, Michael Dadra; do you recall working
18 with him?
19 A. Sorry, no, I don't.
20 Q. Apologies from Ian Anderson; do you recall working with
21 him?
22 A. No.
23 Q. Alan Cook we know and will come on to.
24 Keith Woollard; do you remember him?
25 A. Not necessarily. Long time ago.

24

1 Q. Are you aware if the Post Office Limited Risk and
2 Compliance Committee had any persons attending with
3 legal experience?

4 A. I couldn't tell from that list.

5 Q. Could we turn, please, to page 6, and, if we go to the
6 bottom of the page, it says:

7 "Post Office Limited has a principle of undertaking
8 criminal prosecutions for all cases where it is in the
9 public interest, but noting that likelihood of recovery
10 and circumstances of the defendants and the victims may
11 be relevant to that decision."

12 Firstly, after reading that, do you recall whether
13 you turned your mind to whether this committee was
14 overseeing criminal prosecutions?

15 A. I wouldn't be able to -- I mean, I wouldn't know if
16 I saw this document. So it's difficult to comment,
17 really.

18 Q. Secondly, the point of:

19 "... but noting that likelihood of recovery and
20 circumstances of the defendants and the victims may be
21 relevant to that decision."

22 The likelihood of recovery as being relevant to the
23 decision of whether a criminal prosecution is in the
24 public interest, is that something that would have
25 struck you as odd when you read it at the time?

25

1 A. No, not at all.

2 Q. Can you assist us, is this a fair reading of what
3 happens here: firstly the Board is noting an increase in
4 volume of regulatory issues, yes?

5 You're nodding.

6 A. Yes, I'm waiting for you to finish, actually. Go on.

7 Q. Regulatory issues, does that mean compliance, for
8 example, with financial services issues; is that how you
9 take that to --

10 A. It could be a number of different things. "Regulatory"
11 is quite a broad term.

12 Q. It wouldn't be used to describe prosecutions, would it?

13 A. I'm not sure it would.

14 Q. The decision is, in light of that, for the Compliance
15 Director of Royal Mail Group to be asked to join the
16 committee. Can you recall ever a similar decision or
17 discussion being made in respect of someone from Group
18 Legal joining the Compliance Committee?

19 A. No. Although this is actioned to Jonathan Evans, who
20 I think Legal reported to. I think Jonathan Evans is
21 on --

22 Q. So he's the Company Secretary and your evidence, as
23 before, was the Legal Department -- Group Legal
24 department reported to him.

25 A. I think -- I'm pretty sure it did. So Jonathan would

27

1 A. Well, I'm not sure I did read it at the time. As

2 I said, I don't recall seeing this document, so I'd only
3 be speculating. To be honest, it's not very clear at
4 all, as a --

5 Q. Do I take it from this that, to the best of your
6 recollection at the time, you didn't turn your mind to
7 the circumstances in which Post Office Limited would
8 pursue prosecutions?

9 A. No.

10 Q. That can come down. Thank you.

11 Could we look, please, at POL00032210. This is
12 another meeting of the Post Office Limited Board, this
13 time on 20 April 2006. We can see present, second from
14 bottom, you're in attendance. Yes?

15 A. Yes.

16 Q. If we can turn to page 2, please, and then at the top
17 there's (c). It says:

18 "The Board noted the minutes of the Post Office
19 Limited Compliance Committee of 22 March 2006. In view
20 of the increasing volume of regulatory issues the Board
21 considered that it would be beneficial for the Committee
22 to recruit additional expertise. The Board agreed that
23 Luke March, Compliance Director Royal Mail Group, should
24 be asked to join the Compliance Committee."

25 Do you recall this discussion or this decision?

26

1 be -- you know, he would be the legal representative,
2 I would imagine, in this discussion.

3 Q. My question is slightly different. I think you have
4 answered it, which is: was there a discussion ever at
5 Board level of having someone from Group Legal be put on
6 the Compliance Committee at Post Office level. I think
7 your answer is no, or you don't recall?

8 A. I don't recall but it looks here as if that's what's
9 happened.

10 Q. Sorry, is your evidence that Luke March, as Compliance
11 Director, would be within the Legal function?

12 A. Would be -- no, but this is about regulatory -- I mean,
13 I'm trying to read what you said, but this is about
14 regulatory issues, and Luke March, who I don't recall,
15 but compliance generally is broader regulatory issues.
16 So I think this is -- when I read this, this is about
17 regulatory issues in the broadest sense. Not just about
18 legal issues.

19 Q. No. I suppose I'll narrow my question further: do you
20 recall there ever being a conversation about the General
21 Counsel at group level, or a member of the Royal Mail
22 Group Legal team being asked to sit on the Post Office
23 Limited Compliance Committee?

24 A. Not that I can recall.

25 Q. That can come down. Thank you.

28

1 Is it fair to say that, looking at those Board
2 minutes -- leaving the Compliance Committee to the side
3 because you didn't sit on that, but at the Board
4 minutes -- is it fair to say that the Post Office Board
5 didn't exercise active or real oversight of the
6 prosecutions brought by Post Office Limited?

7 **A.** No, I don't think that's correct. I think what would
8 happen is the Post Office Board would have oversight of
9 those -- that activity, if the executives on that Board
10 felt and knew that there was a significant issue.

11 **Q.** So, again, I think your evidence is it's for the
12 executives to raise the problem. Is your evidence that
13 there's no obligation on the Post Office Board
14 proactively to ask about the process of prosecutions?

15 **A.** Generally they -- they would -- the Board would ask
16 things proactively, if there was an issue or if somebody
17 had seen some data that flagged an issue.

18 **Q.** Is that the general approach to matters, how a Board
19 operates generally?

20 **A.** Well, that's a big generalism. No, obviously not. But,
21 in essence, the Board focuses on one of the key
22 strategic issues facing the business and then relies on
23 the management teams within those businesses to manage
24 the pieces in their operational areas against the
25 policies and procedures that are put in place to do

29

1 of prosecutions, and it wasn't necessary to have
2 hindsight to do that?

3 **A.** No, I think that what was missing was the level of
4 prosecutions, and what was missing was the impact that
5 Horizon was having on that. And with those two
6 issues -- those two issues would weigh significantly on
7 whether the Board, you know, spent time on that
8 particular issue.

9 **Q.** I want to look at some of the evidence given by other
10 senior figures within the Royal Mail Group and Post
11 Office Limited to this Inquiry, and I'll start with
12 Sir Michael Hodgkinson. He was Senior Non-Executive
13 Director of Royal Mail Holdings from 1 January 2003
14 until 31 August 2007 and Chair of Post Office from May
15 2003 to March 2007. I'm not asking you to remember the
16 specific dates but does that broadly sound right to you?

17 **A.** Yes.

18 **Q.** You would have worked with him regularly in your role as
19 Chairman?

20 **A.** Yes.

21 **Q.** Sorry, could you just speak up a bit, was that --

22 **A.** Yes. Sorry, yeah.

23 **Q.** No need to apologise. From your evidence before, I take
24 it you didn't discuss the oversight of prosecutions of
25 subpostmasters with Sir Michael; is that correct?

31

1 that, and those things tend to be reported up to the
2 Board on an *ad hoc* basis, generally driven by an issue
3 being raised that means it needs to be brought to the
4 attention of the Board. It's a top-down and bottom-up
5 approach.

6 **Q.** I'll come back to the questions I asked earlier about
7 the consequences of the criminal process, of which you
8 were aware. Because of those significant consequences,
9 do you not think a more active or careful or different
10 approach to oversight was required by the Board because
11 of the significant consequences?

12 **A.** Well, obviously at the time, that was not the case.
13 People did not think that. With hindsight, obviously
14 that would -- I would change my opinion today. But
15 I think the crucial issue here is that the systemic
16 issues of Horizon then impacted the prosecutions of the
17 subpostmasters was not an issue that was ever raised
18 over a long period of time, and a lot of governance
19 comes from intelligence up the organisation.

20 **Q.** Again, I'm going to deal with Horizon shortly. You said
21 "with hindsight". The risk arising from prosecutions
22 was known and obvious at the time; would you agree?

23 **A.** Yes.

24 **Q.** Would you accept that the Post Office Board should have,
25 knowing what it knew, exercised more proactive oversight

30

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

2 **Q.** I think you said, "Not that I can recall"?

3 **A.** Yeah.

4 **Q.** Can we please bring up Sir Michael's statement. It is
5 WITN10660100. It came up before I finished the number,
6 very impressive.

7 Can we turn to page 22, please. Paragraph 56, it
8 says:

9 "I have been asked about where the responsibility
10 lay in the Holdings Group for criminal prosecutions and
11 civil proceedings of [subpostmasters] for shortfalls in
12 branch accounts. I cannot recall who would have been
13 responsible within [Post Office Limited], but my
14 assumption is that this would have been dealt with by
15 the [Post Office Limited] Legal Department who would
16 have reported any issues to the CEO or COO."

17 It goes on to say:

18 "I do not recall discussion about the risks and
19 compliance issues arising from the prosecution of
20 [subpostmasters] for theft and false accounting, or the
21 pursuit of civil litigation against [subpostmasters] to
22 recover alleged shortfalls in branch accounts. As far
23 as I was aware, there was a fully functioning Legal Team
24 responsible for these actions."

25 Then if we can bring up on the screen, at the same

32

1 time, please, Sir Michael's evidence to the Inquiry.
2 It's INQ00001128.

3 We'll see this is the transcript of the proceedings
4 on 11 April 2024. If we could go to page 32. That. Is
5 internal page 126 at line 9. Mr Blake is asking
6 questions and says:

7 "Putting those three together, did the Board, so far
8 as you recall, ever receive notice of concerns about
9 prosecutions relating to Horizon or problems with the
10 Horizon system itself?

11 **"Answer:** I was not made aware of those.

12 **"Question:** I'd just like to read paragraph 38.1 of
13 your statement which addresses the legal document. It
14 says:

15 "I do not believe the Board had direct oversight or
16 involvement with the Legal Department and I do not
17 recall the structures of the Legal Team. This was
18 ultimately the responsible of the CEO and COO."

19 "We saw when we started today the Board composition.
20 It doesn't seem as though there was what you might see
21 nowadays, a General Counsel --

22 **"Answer:** Yeah.

23 **"Question:** -- someone of an equivalent position.

24 "Was there, in your view, any gap in relation to
25 oversight of the Legal Department at the Post Office?"

33

1 Crozier, please. He was Chief Executive between
2 February 2003 to April 2010; does that sound about
3 right?

4 **A.** Yes.

5 **Q.** He reported to you; is that right?

6 **A.** Yes.

7 **Q.** Would you have worked with him closely?

8 **A.** Yes.

9 **Q.** Again, from your evidence before, I take it that you
10 don't discuss the oversight of prosecutions of
11 subpostmasters with Mr Crozier?

12 **A.** Yes.

13 **Q.** Can we look at his witness statement please. It's
14 WITN04390100, page 14, please, paragraph 41.1. We see
15 from 41 it's talking about supervision, it says:

16 "As far as I can recall:

17 "Oversight for criminal prosecutions and civil
18 proceedings brought by [Post Office] would have sat with
19 the [Post Office] Legal Team, and oversight for
20 prosecutions brought on behalf of the rest of the Group
21 would have sat with the Group Legal team."

22 If we can then look at his evidence to the Inquiry;
23 it's INQ00001129. If we turn to page 27, please.
24 A4-page 27, please. Scroll down please, there we see
25 Mr Crozier giving evidence, questioned by Mr Beer.

35

1 **"Answer:** I think there was and I think that was
2 part of the fact that some of the functions remained
3 central.

4 **"Question:** Can you expand on that, please?

5 **"Answer:** I think we had a subset of the Royal Mail
6 Legal department.

7 **"Question:** What was the problem with that?

8 **"Answer:** I think then it wasn't represented on its
9 own right on the [Post Office] Board.

10 **"Question:** Did that change at all during your time?

11 **"Answer:** No."

12 **"Question:** Was that something you were aware of at
13 the time or is that looking back now?

14 **"Answer:** I think more looking back."

15 Did you discuss the oversight of the Legal
16 Department, the Royal Mail Group Legal Department, did
17 you discuss that with Sir Michael at any point?

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

19 **Q.** In circumstances where Sir Michael was Chair of the Post
20 Office Limited Board and you were Chair of the Group,
21 and the Legal Department within the Group was providing
22 services to the subsidiary, why did you not discuss
23 oversight with Sir Michael?

24 **A.** Because we'd have no reason to discuss the oversight.

25 **Q.** That can come down. Thank you. I'll turn to Adam

34

1 If we could turn, please, to page 35, that's
2 A4-page 35. Thank you. If you can go down to internal
3 page 140, we see there's a question that starts -- or
4 a quote, sorry -- at line 9, and then from line 21 it
5 says:

6 "Were you not aware that, in fact, there was no Post
7 Office Legal team, it had no separate legal in-house
8 function and that civil and criminal proceedings were
9 brought by lawyers within the Royal Mail Group Legal
10 Team?"

11 Over the page he goes on to say:

12 **"Answer:** I was not, no.

13 **"Question:** So lawyers from within the Group gave
14 advice on prosecutions, they made decisions about
15 prosecutions and within prosecutions, and they conducted
16 the proceedings, not any Post Office lawyers. You
17 didn't know that?

18 **"Answer:** Was that throughout the whole period or --

19 **"Question:** Yes.

20 **"Answer:** And I -- I'm sorry --

21 **"Question:** Throughout the whole of your period.

22 **"Answer:** My period?

23 **"Question:** Yes.

24 **"Answer:** I was not aware of that, no.

25 **"Question:** Given the facts that I've just

36

1 described, that would mean, is this right, that your
2 Board had a responsibility for the conduct of a team of
3 lawyers within Royal Mail Group who were acting on
4 behalf of the Post Office, rather than the Post Office
5 Board having such a responsibility for them, wouldn't
6 it?

7 **"Answer:** In part yes, but also, they would be doing
8 that at the behest of the Post Office team who owned
9 Horizon and any issues deriving out of that.

10 **"Question:** Well, they might be their clients.

11 **"Answer:** Yes.

12 **"Question:** Post Office Limited might be their
13 client?

14 **"Answer:** Yes, sorry, yes.

15 **"Question:** I'm talking about responsibility for the
16 conduct and work of the lawyers. That fell, if I'm
17 right, to Royal Mail Group to manage and oversee?

18 **"Answer:** My understanding at the time was that was
19 also under the supervision of the Company Secretary at
20 the Post Office, in conjunction with the Royal Mail, and
21 they used, I thought, a mix of Post Office Legal Team
22 augmented by Royal Mail Legal Team and outside legal
23 people, as well. That was my understanding."

24 Did you discuss with Mr Crozier how the legal teams
25 were structured across the group when you were at Royal

37

1 I think, people who were dedicated to POL in that Legal
2 Team. So this is not an unusual structure in any way,
3 shape or form.

4 **Q.** Did you not see there being a problem with the Chief
5 Executive Officer of Royal Mail Group not being aware of
6 precisely what the Legal team within Royal Mail was
7 doing, namely involved in the prosecution of
8 subpostmasters for Post Office Limited?

9 **A.** Well, I think that's a question you need to ask the CEO
10 of the Royal Mail. I mean -- if --

11 **SIR WYN WILLIAMS:** Gentlemen, I think I've got the general
12 structure quite a long time ago and I got Mr Crozier's
13 evidence that he didn't know about it. Whether he
14 should have known about it is quite another thing.

15 **MR STEVENS:** Mr Leighton, can I ask you this, then: why is
16 it that you didn't discuss Royal Mail Group's legal
17 responsibilities with Mr Crozier?

18 **A.** Because we -- he never -- we'd never raised it as
19 an issue --

20 **SIR WYN WILLIAMS:** Again, Mr Leighton, can I shortcut this:
21 the impression I get from you is that, rightly or
22 wrongly, you did not discuss these issues, either
23 formally in a Board or informally with anyone else, and
24 the reason you have given me is that because these
25 issues were never raised with you. Now, is that it, in

39

1 Mail?

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

3 **Q.** So for that reason, presumably you can't assist us with
4 how Mr Crozier may have come to understand that there
5 was a Post Office Limited Legal Team responsible for
6 prosecutions?

7 **A.** Not at all. I mean, it may be worth -- it is not
8 unusual to have -- remember, the Royal Mail Group had
9 a number of ancillary companies: Post Office, GLS,
10 Parcelforce, Royal Mail Holdings, the Royal Mail itself.
11 So it's not unusual at all to have a Group function at
12 Royal Mail Group, where that group function supports
13 those individual divisions. In fact, it's generally the
14 case in most companies where you have a group set-up.

15 So this structure is not unusual. And in that -- in
16 the Royal Mail Group Legal team, it would also not be
17 unusual for that -- a team of that -- a part of that
18 team to be dedicated to Post Office Limited, and for
19 that team to have a dotted line into Post Office
20 Limited.

21 So, you know, when I read these responses, they seem
22 to be quite confused but it's very clear: Royal Mail
23 Group had group functions. Those group functions
24 assisted the divisions that worked within Royal Mail,
25 and that included the Legal Team supporting POL with,

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1 summary?

2 **A.** Yes, but also, sir, this point about -- obviously,
3 there's been some confusion with people as to -- the
4 first piece of confusion was, you know, did the --
5 people not knowing that Royal Mail carried out these
6 prosecutions, which it's been doing for a long, long
7 period of time, and then, secondly, the structure of
8 where the Legal Team sat in Royal Mail and POL. And
9 what I'm saying to everybody is this structure is not
10 unusual in any way, shape or form, and it's slightly
11 surprising that people didn't know that this was the
12 structure and this is how it worked.

13 **SIR WYN WILLIAMS:** Well, clearly you knew.

14 **A.** Absolutely.

15 **SIR WYN WILLIAMS:** Yes.

16 **MR STEVENS:** I want to come back, Mr Leighton, to something
17 you said in your evidence last time, which I repeated
18 this morning, which was, in relation to the roles of
19 a Non-Executive Director or Chair, that the most
20 important thing is to have some set processes to make it
21 clear where the responsibility lies.

22 The Inquiry has also heard evidence from David Mills
23 and Alan Cook. For example, Alan Cook said he wasn't
24 aware of the prosecutorial decisions being made in-house
25 until 2009. Do you accept any responsibility for the

40

1 fact that key figures -- Adam Crozier, David Mills, Alan
 2 Cook -- appear to be confused about the role of Royal
 3 Mail Legal and the oversight of prosecutions?
 4 **A.** None at all.
 5 **Q.** Why not?
 6 **A.** Because it's very -- to me, it's all been very clear
 7 exactly what that structure is and these are executives
 8 in the business working full time in the business and
 9 I'm somewhat surprised that they didn't understand the
 10 structure.
 11 **MR STEVENS:** Sir, that's probably a good time to take the
 12 morning break because we'll move on to a separate set of
 13 topics thereafter.
 14 **SIR WYN WILLIAMS:** I had assumed that Mr Leighton's evidence
 15 would be completed reasonably quickly, since we dealt
 16 with him for a couple of hours, and I'm anxious about
 17 the timing for today altogether, if you see what I mean.
 18 How much longer do you expect Mr Leighton to be giving
 19 evidence?
 20 **MR STEVENS:** Half an hour, sir, if that.
 21 **SIR WYN WILLIAMS:** Fine. Okay, fine. That's fine.
 22 **MR STEVENS:** I think with the transcriber it would be better
 23 to have the break now.
 24 **SIR WYN WILLIAMS:** Yes, by all means. Sure. So what time
 25 shall we resume?

41

1 **A.** I would imagine so, yes.
 2 **Q.** "The Chairman reported that he had become aware that
 3 a suggestion may have been made by a DTI Minister that
 4 Mr Colin Baker, General Secretary of the NFSP, should
 5 become a Non-Executive Director of Post Office Limited.
 6 After careful consideration the Board agreed that it
 7 would reject the proposal, if made, for the following
 8 reasons ..."
 9 Firstly, and we can summarise them: Colin Baker's
 10 position with the union would be compromised by a closer
 11 relationship; over the page, a Non-Executive Director
 12 would need to be independent of the day-to-day executive
 13 affairs; and then another matter about the Nolan rules.
 14 Do you recall that discussion?
 15 **A.** I don't recall the discussion but I can see what the
 16 discussion was from this note, yeah.
 17 **Q.** At any point, at this point or thereafter, do you recall
 18 the Board considering whether there should be
 19 a subpostmaster representative on the Board?
 20 **A.** Not past this particular point, no.
 21 **Q.** Do you know why that was?
 22 **A.** I think, for the reasons that are given here. I think
 23 it's -- I think these are good reasons why this couldn't
 24 happen. There would be a big conflict of interest and
 25 the other piece of this is the Nolan rules are quite

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1 **MR STEVENS:** If we could say 11.00, sir.
 2 **SIR WYN WILLIAMS:** Fine.
 3 **MR STEVENS:** Thank you.
 4 **(10.51 am)**
 5 **(A short break)**
 6 **(11.00 am)**
 7 **MR STEVENS:** Sir, can you still see and hear us?
 8 **SIR WYN WILLIAMS:** Yes, thank you.
 9 **MR STEVENS:** I wanted to look at a topic about Board
 10 composition. Would you agree that subpostmasters, as
 11 individual businesses, invested significantly in the
 12 Post Office Network?
 13 **A.** Absolutely.
 14 **Q.** Who, at Board level, was considering their interests?
 15 **A.** The team that were -- the POL team, the MD of POL and
 16 the Chair of POL, and all the other Board members of the
 17 Royal Mail.
 18 **Q.** Could we look, please, at POL00021487, so a meeting of
 19 the Post Office Limited Board on 23 February 2005. We
 20 see, third from the bottom, you're in attendance. On
 21 "Appointment of Directors", at the bottom of this page,
 22 please, it says the Chairman -- pausing there, I'm
 23 assuming that's referring to Sir Michael Hodgkinson as
 24 Chairman of the Committee, rather than you as Chairman
 25 of Royal Mail?

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1 explicit on that you need to have a number of criteria,
 2 of which part is quite a significant commercial
 3 criteria.
 4 So I think this was a -- the right decision, and
 5 made sense. But, also, I think it's this point made
 6 before: the interests of the subpostmasters was driven
 7 by POL but also all the members of the Royal Mail Group
 8 Board. Only this issue, and the significant tragedy, of
 9 the Horizon issues and the systemic issues off the back
 10 of that -- but in support of the Post Office and
 11 subpostmasters, in my time at the Royal Mail, that was
 12 always very significant across the Board, both boards.
 13 **Q.** That can come down. Thank you.
 14 I want to look at oversight of Horizon. I think you
 15 agree, you say in your witness statement that the
 16 transaction data recorded by Horizon was used to compile
 17 Post Office Limited's management and statutory accounts?
 18 **A.** I think so, yeah.
 19 **Q.** A director of a company is required to prepare a set of
 20 accounts that gives a true and fair view of the state of
 21 affairs of the company; would you agree with that?
 22 **A.** Yes.
 23 **Q.** So the director must be able to have confidence in the
 24 data being used to prepare those accounts?
 25 **A.** Yes.

44

1 Q. So any allegation of a lack of integrity in the data
 2 produced by Horizon would have been a significant issue
 3 for both Post Office Limited and Royal Mail Group?
 4 A. Yes.
 5 Q. Can we turn to your statement, please, page 18,
 6 paragraph 35. You say:
 7 "My main recollection of the Board's oversight of
 8 the Horizon IT project is that a key focus, and repeated
 9 discussion point within the Board of [Post Office
 10 Limited], related to the timeline and headline content
 11 of the project, the cost and its value for the UK
 12 Government and by extension the taxpayer. This is
 13 evident from the minutes provided to me by the Inquiry
 14 but I also recall that, from the time I began working
 15 with [Royal Mail Holdings] and [Post Office Limited],
 16 [Post Office Limited] was in a difficult financial
 17 position, and Horizon represented a significant cost.
 18 I knew that projects of this nature often took
 19 significantly more than the planned time and cost to
 20 implement properly. This was therefore an area that was
 21 tested by the Board -- the company needed a system which
 22 was fit for purpose and represented value for money."
 23 Do you recall being told anything about Horizon's
 24 fitness for purpose when you served on the Board?
 25 A. All of the time. I mean, the most significant thing
 45

1 has heard evidence that Fujitsu thought this had been
 2 resolved by the S90 release.
 3 Can we look, please, at POL00032210. It's a Board
 4 meeting on 20 April 2006. If we could please turn to
 5 page 10. We can go down to the "Operations Report"
 6 section, please. We see it says "Horizon S90
 7 Release" -- firstly sorry, pausing there it says, "The
 8 Board noted the report and in particular that"; where it
 9 says "noted" does that mean that there was any
 10 discussion on the report?
 11 A. I can't recall it was such a long time ago, but I would
 12 imagine there would have been some discussion on it.
 13 Q. "The Horizon S90 release", number (iv):
 14 "provide for a plethora of change requests across
 15 a variety of existing capabilities."
 16 Do you recall whether or not any questions were
 17 asked as to what changes were made to the system or if
 18 there were any bug fixes?
 19 A. No, I can't but I do read:
 20 "The release continued to make good progress. There
 21 had been number of issues in the pilot but these had
 22 been quickly diagnosed and resolved."
 23 And that's what we'd expect to see. We'd expect to
 24 see what's actually happening, what's the state of play,
 25 if there are any issues, are they being resolved? And
 47

1 about this Horizon project, and it's reflected in
 2 certainly all the documentation you've given me, there's
 3 not a Board meeting that goes by where it's not talked
 4 about, and that's very unusual for an IT system, even
 5 an IT system of this scale. So the amount of oversight
 6 on Horizon within the organisation as a whole was
 7 extremely high.
 8 Q. We won't go through them but would you accept that a lot
 9 of the discussion at Board level was on the negotiation
 10 of contracts relating to Horizon, rather than the
 11 technical oversight of it?
 12 A. No, I -- if you read -- certainly from the Board minutes
 13 I've read, a lot of the discussion and a lot of the
 14 documentation is absolutely about the enabling impacts
 15 of Horizon. All of the new releases -- I mean, this is
 16 a -- this is a massive IT system with multiple releases,
 17 with millions of transactions, which -- as all these
 18 systems have -- have problems and issues along the way,
 19 and I feel very confident, having read all the papers
 20 and reminded myself, that the oversight on this -- on
 21 the project, the Horizon project, was probably more
 22 significant than I'd ever seen on any IT project.
 23 Q. You've referenced releases. The Inquiry has heard
 24 evidence about the Callendar Square bug, the bug that
 25 caused discrepancies in branch accounts, and the Inquiry
 46

1 that, I think, was the theme of Horizon for a long
 2 period of time.
 3 Q. So when you are referring to the oversight and the
 4 detailed oversight you said, at Board level, this is the
 5 type of thing?
 6 A. This is the type of thing. "Network Resilience" is
 7 a good example:
 8 "... the software necessary to deploy ... for 2,000
 9 large branches and ... solution to limit the period of
 10 downtime for smaller branches", which was now ready for
 11 implementation.
 12 These are significant steps on the evolution of
 13 Horizon.
 14 Q. That can come down. Thank you.
 15 At paragraph 36, we don't need to bring it up, you
 16 refer to a visit to Chesterfield, which was where the
 17 Product and Branch Accounting was based at Post Office
 18 Limited, and you say:
 19 "Although there appear to be some day-to-day issues
 20 that the staff in the office were dealing with, I do not
 21 recall there were complaints which indicated major
 22 issues with the system."
 23 What were the day-to-day issues you were told about?
 24 A. Again, I can't recall what they were, it was such a long
 25 time ago. But most of the day-to-day issues were about
 48

1 slow running and some outages, and things like that.
 2 The major point is, at no stage in any of the
 3 documentation is there any clue that there's a systemic
 4 issue with Horizon, and the opportunity for that to
 5 arise is significant, because there's not a Board
 6 meeting of the Royal Mail Group or the Post Office
 7 Limited where that Horizon is not discussed.
 8 **Q.** Can we look, please, at POL00107538.
 9 This is a letter addressed to you from Sir Alan
 10 Bates on 7 August 2003. Paragraph 51 of your statement,
 11 we don't need to turn it up, it says:
 12 "I do not recall receiving these letters and I do
 13 not know if I did."
 14 To be clear, is your evidence that you cannot
 15 remember whether you did or did not receive them?
 16 **A.** That's my evidence. But it's -- it looks more than
 17 probable that I didn't because of what happened post.
 18 So you can see that it's obviously been passed on to two
 19 people -- in the top right-hand corner, that's not my
 20 writing. And then in all the subsequent responses to
 21 this, which went over quite a long period of time, about
 22 six months, I'm not copied in on any of them. So
 23 I would say the likelihood is I never saw this letter.
 24 But I can't say for definite I didn't.
 25 **Q.** We see at paragraph 3, it says:
 49

1 different exchanges between that which go on for quite
 2 a long period of time. Lots of different people engaged
 3 in it.
 4 **Q.** Obviously you worked at the company and with the people.
 5 Do you have any insight or can you assist us with why
 6 a letter like this wouldn't be passed up to you?
 7 **A.** Lots of letters would not be passed up to me. You know,
 8 I think other people have said the same: we would get
 9 hundreds or thousands of letters and, often, they would
 10 not come to us, they would be handled by one of the
 11 Complaints Department or another department, and we
 12 wouldn't necessarily see them. If we -- one thing's for
 13 sure, if I'd have seen this letter, then I would have
 14 been copied in on the correspondence post it.
 15 **Q.** Could we please look at POL00161769.
 16 **A.** I think it's a very important letter, I think it also --
 17 I want to say -- and I think you've seen, certainly in
 18 the documentation, that the process -- there was
 19 a process that was taken past this letter, which is the
 20 process I'd expect to see, which is somebody responded
 21 to it, another letter came back, there were more pieces
 22 of dialogue. I think at one stage an MP got involved.
 23 Then, to make sure there was not a biased response,
 24 I think one of the --
 25 **Q.** Just pausing there, sorry, Mr Leighton, if your evidence
 51

1 "It is again trying to use what seems to be so often
 2 described as its outdated 'Stalinistic' management
 3 approach, in order to bludgeon its will onto the poor
 4 subpostmaster, with an issue that could bankrupt every
 5 sub post office in the country. Whilst I appreciate the
 6 principle can be expensive, I cannot agree to any
 7 position which would leave me (and every other
 8 subpostmaster) liable for claims of millions of pounds
 9 from the Post Office without any redress or access to
 10 data to check such claims."
 11 Then it goes on at page 3, paragraph 2 to say:
 12 "My personal belief, based on my experiences and
 13 from stories I hear, is that the Post Office are having
 14 considerable problems with the Horizon software, and
 15 that was especially true in the early days."
 16 That effectively summarises the scandal, doesn't it,
 17 or the problem that the subpostmasters were facing?
 18 **A.** I think probably, yes. I mean it's hard to judge but
 19 ...
 20 **Q.** So this letter, who would be handling it on your behalf
 21 if you say you didn't see it?
 22 **A.** Well, I think it's the people on the -- if you look at
 23 the top, I think there's a series of correspondence post
 24 this from different people, who respond to Mr Bates,
 25 I think there's a -- sorry, Sir Alan Bates. There's
 50

1 is that you were not involved in that process, we can
 2 read the documents to see what happened.
 3 **A.** No, okay, I'm just saying that if I'd -- the process
 4 that was then taken on board post-this would be the
 5 process I would expect.
 6 **Q.** Please can we bring up POL00161769. If we could go to
 7 page 8, please, you see there's an email from Karen
 8 Arnold to Mr Hughes, 2 July 2006, asking for an update
 9 about Hoylake:
 10 "... is the [subpostmaster] still maintaining his
 11 allegations about the Horizon system, I guess if this is
 12 still the case then we won't be able to get it rolled
 13 over ..."
 14 If we turn to page 7, please we see the response:
 15 "Karen, [ex-subpostmaster] still raises issues
 16 around Horizon hence our inability to reopen."
 17 Then it goes on:
 18 "When I reopened Gaerwen late last year within
 19 a couple of hours of audit, I had to close almost
 20 immediately because of a similar scenario."
 21 Could we then, please, go to page 5. Mark
 22 Partington's email on 5 July:
 23 "We need to weigh up the cost to the business of the
 24 installation at short notice of a new kit and the
 25 configuration of this by Fujitsu. Against this we have
 52

1 a closed branch, and the loss to the business this is
2 resulting in, and the exceedingly bad PR we will receive
3 if we cannot open this branch in the next week or so."

4 Then, bottom of page 2, please. You see an email
5 from John Breeden there 6 July. Go over the page:

6 "As mentioned on the phone the Chief Executive of
7 the local council has written again seeking assurances
8 this branch will be opened by the start of the Open Golf
9 later this month. I am pleased to see progress is being
10 made with the recruit of an interim."

11 It's probably a matter of public record, that's the
12 Open Championship at Hoylake. If we go to page 2,
13 7 July:

14 "Just to advise you I have been made aware that
15 Allan Leighton has been asked to be kept informed on
16 progress on the reopening."

17 Do you recall what reasons you were given for the
18 Post Office being closed?

19 **A.** No.

20 **Q.** Presumably, whether or not a Post Office is open or
21 closed isn't something that you would, as Chair of the
22 Royal Mail Group, usually get involved in?

23 **A.** No, unless in this particular case, what -- and again
24 I can't recall this but what it seems to me, I'm asking
25 about the reopening, so I think somebody has asked

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1 "My understanding is that the integrity of the
2 Horizon data is sound and it is as a result of this that
3 persistent challenges that have been made in court have
4 always failed."

5 The Inquiry has heard evidence of the various
6 challenges that were made to Horizon. Again, is your
7 evidence that you were never informed of any of these
8 challenges in courts?

9 **A.** Absolutely. The systemic issues and some of the bugs
10 that came out since were never brought to either me or
11 the Board's attention.

12 **Q.** If the Board, or the system, was operating as you think
13 it should have done, who should have brought those
14 concerns to you, in terms of the challenges made in
15 courts?

16 **A.** That should have come up via the operation and the legal
17 functions.

18 **Q.** So the operation and legal functions?

19 **A.** Yeah.

20 **Q.** So that included the Company Secretary?

21 **A.** Who would be head -- if the company secretary at this
22 stage -- it's 2010 -- I don't know, was in charge of
23 Legal. I've not seen this document so this is after
24 I've gone, presumably, isn't it?

25 **Q.** Yes, yes.

55

1 a question about will this post office be open for the
2 golf?

3 **Q.** Yes, there's a massive golf tournament going on, which
4 encourages a lot of tourism, and you're being asked when
5 it will reopen.

6 **A.** I think that's what it looks like, yeah.

7 **Q.** Surely, in those circumstances, would you not ask the
8 reasons as to why the post office closed?

9 **A.** Not necessarily, no.

10 **Q.** Why not?

11 **A.** I just wouldn't. I'd be asking the question here about
12 why -- you know, when will it be reopened? I will be
13 addressing the question.

14 **Q.** In order to address that question, you wouldn't have
15 thought it relevant to ask the reasons why it was
16 closed?

17 **A.** No.

18 **Q.** If we look, please, at POL00106867.

19 We see an email from Rob Wilson, Head of the
20 Criminal Law Team at Royal Mail; do you remember Rob
21 Wilson?

22 **A.** Not really, no.

23 **Q.** 3 March 2010, that's after you finished --

24 **A.** Yeah.

25 **Q.** -- as Chair. It says:

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1 **A.** Okay, yeah.

2 **Q.** That can come down, thank you. I've one more point
3 I want to ask you on, please. Could I please have
4 POL00120833. It's an Excel spreadsheet. If we could go
5 to the "Risk/Opps" tab, P5, it says at the bottom. The
6 Inquiry has seen this before. It's been described as
7 a register of risk within the IT Directorate for Post
8 Office Limited. Would you have seen a document like
9 this at the time?

10 **A.** No.

11 **Q.** If we look in the description, the first row, beneath
12 that, the description is:

13 "Damage to reputation of Post Office and potential
14 future financial losses if Post Office loses court case
15 relating to reliability of Horizon accounting data at
16 Cleveleys branch office."

17 Then "Action":

18 "Royal Mail Legal services have made an offer for
19 out-of-court settlement of the case.

20 "Review with Fujitsu of their processes to protect
21 against similar future cases."

22 We see the risk is put at £1 million.

23 From your perspective, should that have been raised
24 to the Royal Mail Group Board as a risk?

25 **A.** Which one?

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- 1 **Q.** The damage to reputation -- the first risk which
2 I just --
- 3 **A.** But is that being specific about that one branch office,
4 or -- I'm trying to --
- 5 **Q.** Well, if we see, it says:
6 "Damage of reputation of Post Office and potential
7 future financial losses if Post Office loses court case
8 relating to the reliability of Horizon accounting data
9 at Cleveleys branch office."
10 So it's referring to one case, namely the Cleveleys
11 case, but would you accept that it's raising the risk of
12 potential future financial losses?
- 13 **A.** Well, it's certainly -- it is but the risk that it's got
14 attached to it is -- looks relatively low. So if you're
15 asking me would I expect that that particular -- that
16 particular point to come to the Royal Mail Group Board,
17 probably because the level of risk is so low, probably
18 not.
- 19 **Q.** Where are you saying that's a relatively low risk?
- 20 **A.** Well, 1 million.
- 21 **Q.** Sorry?
- 22 **A.** 1 million.
- 23 **Q.** I see. So because of the quantification of the risk?
- 24 **A.** Yes. So the level of risk plays a big part of what
25 comes into the risk thought process.

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- 1 **A.** -- and that basically it was made clear that the
2 prosecution would not succeed because there was
3 a systemic issue in Horizon, and, for me, that would
4 have been a significant point.
- 5 **SIR WYN WILLIAMS:** Right. So that I can understand this, in
6 the Cleveleys case -- and this may -- just to ensure
7 that we are not at cross purposes -- there had been
8 obtained a joint report, it was civil proceedings not
9 criminal proceedings, and there'd been a joint report
10 from an expert which suggested -- and I use the layman's
11 terms -- problems with Horizon, which had caused the
12 loss. As a result, that case was settled by the Post
13 Office.
- 14 Now, are you telling me that had you, not
15 necessarily in your capacity as Chair of our Royal Mail,
16 but as a senior Royal Mail or Post Office person, been
17 aware of an expert report which suggested problems with
18 Horizon, and, as a consequence, the Post Office were
19 proposing to settle the case, that that is something
20 which should have been taken very seriously and
21 investigated?
- 22 **A.** Absolutely.
- 23 **SIR WYN WILLIAMS:** So when earlier this morning Mr Stevens
24 took you to -- I'm now not quite sure whether it was
25 a policy or what, but let's call it a policy, whereby

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- 1 **Q.** But the fact that it says that the court case relating
2 to the reliability of the Horizon accounting data, that
3 wouldn't trigger it going higher, in your view?
- 4 **A.** I'd be guessing.
- 5 **Q.** I'm going to ask you a hypothetical. If you had seen
6 this at the time, what do you think you would have done?
- 7 **A.** Well, I saw in the papers the Cleveleys piece. So, if
8 I'd have seen the Cleveleys piece, then that would have
9 raised a real issue.
- 10 **Q.** When you say that, do you mean the advice --
- 11 **A.** Yes, that would have raised a real issue.
- 12 **Q.** What would you have done, having read that advice?
- 13 **A.** I'd have had a massive dig into everything around it.
- 14 **Q.** That document can come down. Thank you.
- 15 Sir, those are the questions I have. Do you have
16 anything?
- 17 **Questioned by SIR WYN WILLIAMS**
- 18 **SIR WYN WILLIAMS:** Yes, I wasn't quite clear about that last
19 answer. Did you say of the Cleveleys piece,
20 Mr Leighton?
- 21 **A.** Yes, sir, in the --
- 22 **SIR WYN WILLIAMS:** What do you mean by that, sorry?
- 23 **A.** In the documentation, there's a note on what happened at
24 Cleveleys --
- 25 **SIR WYN WILLIAMS:** Yes.

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- 1 litigation which was going to cause very substantial
2 financial loss or relate to important policies of the
3 Post Office, should be brought to the Board, then this
4 case would have fallen into that category, in your
5 opinion?
- 6 **A.** Absolutely.
- 7 **SIR WYN WILLIAMS:** Fine. While we're on that, a couple of
8 years later Mr Castleton was sued, as you probably know
9 from press reports, by the Post Office for
10 a comparatively small sum of money, about £25,000. In
11 that case, he maintained that there were no losses to
12 the Post Office, that -- these are my words -- it was
13 all a figment of Horizon, rather than being a real loss.
- 14 That case was litigated in the High Court. Is that
15 also the sort of case, in your view, which should have
16 been raised to the level of the Board, given what was
17 involved in it?
- 18 **A.** I think the answer is yes, sir. I think the Cleveleys
19 one, in a strange way, more so because it meant that
20 a prosecution didn't take place.
- 21 **SIR WYN WILLIAMS:** All right. I take it that it's your
22 evidence that, at the time -- namely in 2004, Cleveleys;
23 2006, Mr Castleton -- you and/or the Board knew nothing
24 about them?
- 25 **A.** Absolutely, sir.

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1 **SIR WYN WILLIAMS:** Fine. Sorry, Mr Stevens, but I wanted to
2 be clear about that.

3 **MR STEVENS:** Yes. Not at all, sir.
4 In fact I think I should clear one thing up, because
5 I can see the list of documents sent to Mr Leighton and
6 can we just bring on screen POL00118229. When you were
7 earlier referring to a document on Cleveleys, was it
8 this document?

9 **A.** I think so, yes.

10 **MR STEVENS:** So that being the advice. Thank you. That can
11 come down.

12 Sir, I believe Mr Stein has two minutes' of
13 questions. I think that's it: Mr Stein with two
14 minutes' of questions.

15 **SIR WYN WILLIAMS:** Right. Over to you, Mr Stein.

16 **Questioned by MR STEIN**

17 **MR STEIN:** Mr Leighton, one area whereby information should
18 have been relayed to a board -- we'll talk about which
19 board in a moment -- could have been via company
20 accounts? So if we think about the situation that was
21 ongoing, as we know it, within the investigation and
22 prosecution of subpostmasters, somewhere within
23 accounting there should have been: the costs of that
24 system ongoing; costs including the costs of
25 Investigators; costs of the actual prosecutions; money

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1 I suppose things can't be just pretty unique -- but even
2 though it is a very unusual situation for a company to
3 prosecute its own people, in other words subpostmasters,
4 you are saying that you don't think it is likely that it
5 would have had a separate accounting?

6 **A.** I think so, yes.

7 **Q.** All right.

8 On a slightly more granular level, there must have
9 somewhere been accounting for those costs within the
10 organisation. It must have existed at some level, do
11 you agree?

12 **A.** Yeah, but probably not in a joined-up way as you
13 described.

14 **Q.** Right. So in other words, the individual costs of
15 prosecutions, the number of prosecutions, it must have
16 been known about at some point within the accounting
17 department at --

18 **A.** Yeah, in -- well, it would probably show in the
19 divisions where that money was taking place. I'm sort
20 of not 100 per cent, but based on what I would imagine,
21 what I know on what I see every day, I would imagine it
22 would show in each cost centre of the individual
23 division that was responsible for that particular piece
24 of activity.

25 **MR STEIN:** Right. Thank you, Mr Leighton.

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1 coming back another way, which is via the court process,
2 which would include any recovery of monies through those
3 processes; and then through the civil system of
4 investigations, the taking of individuals to the civil
5 courts, the same?

6 One other aspects of costs that we have been hearing
7 about within the Inquiry has of course been the costs
8 of, on occasions, when there was information requested
9 from Fujitsu to support prosecutions or civil actions,
10 those costs as well?

11 So, in that general area of costing, do you agree it
12 would have been somewhere in company accounts?

13 **A.** Not necessarily.

14 **Q.** Right. Help us understand why not.

15 **A.** Largely, when -- those types of issues would be picked
16 up with the auditors. So what tends to happen, you have
17 a discussion with the auditors about what you disclose,
18 what you don't disclose, what needs to be -- so I would
19 imagine if a -- and I don't know this -- a conversation
20 may well have taken place along that line, and the
21 auditors would probably have said that, you know, that
22 sort of disclosure is not necessary. It is -- we're in
23 a -- we're a unique organisation but it would be quite
24 unique to show that in a set of accounts, I think.

25 **Q.** Even though it's a unique situation or pretty -- well,

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1 **THE WITNESS:** Thank you.

2 **SIR WYN WILLIAMS:** Is that it, Mr Stevens?

3 **MR STEVENS:** Yes, sir, that's it.

4 **SIR WYN WILLIAMS:** Let me thank you, Mr Leighton, for
5 returning to give evidence before the Inquiry. There
6 was unfortunately a long delay between your two
7 appearances but, as I expect you'll have understood, we
8 have been busy hearing from a great number of people,
9 and we couldn't fit you in more quickly than we did.
10 But I'm very grateful to you for coming back and for
11 answering the further questions.

12 **THE WITNESS:** Thank you.

13 **MR STEVENS:** Thank you, sir.

14 I think it would be best to take a 10-minute break
15 now, more time efficient, and then we run until lunch.

16 So if I could say we come back at 11.45.

17 **SIR WYN WILLIAMS:** Certainly.

18 **MR STEVENS:** Thank you, sir.

19 (11.35 am)

(A short break)

20 (11.45 am)

22 **MR BLAKE:** Good morning, sir. Can you see and hear me?

23 **SIR WYN WILLIAMS:** Yes, thank you very much. Yes.

24 **MR BLAKE:** Can I call Mr Edwards, please?

25 **MARTIN ANTHONY EDWARDS (affirmed)**

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Questioned by MR BLAKE

- 1
- 2 **MR BLAKE:** Can you state your full name, please?
- 3 **A.** Martin Anthony Edwards.
- 4 **Q.** Thank you. Mr Edwards, you should have in front of you
- 5 a witness statement.
- 6 **A.** Yes.
- 7 **Q.** Can I ask you to have look at that witness statement.
- 8 Is it dated 18 April this year?
- 9 **A.** Yes.
- 10 **Q.** Could I ask you to turn to the final substantive page,
- 11 please, that's page 45. Can you confirm that that is
- 12 your signature?
- 13 **A.** It is.
- 14 **Q.** Can you confirm that that statement is true to the best
- 15 of your knowledge and belief?
- 16 **A.** It is.
- 17 **Q.** I believe there's one change that you would like to make
- 18 to that statement?
- 19 **A.** Yes.
- 20 **Q.** Can you assist us with what that is?
- 21 **A.** So, paragraph 23.
- 22 **Q.** Perhaps we could bring it up on the screen. It's
- 23 WITN09760100.
- 24 **A.** So the sentence beginning "The reports I refer to".
- 25 **Q.** It's page 8, paragraph 23, it's about halfway through.

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- 1 terms, so middle management.
- 2 **Q.** You joined the Post Office in September 2012; is that
- 3 right?
- 4 **A.** Yes.
- 5 **Q.** Did you know anybody at the Post Office when you joined?
- 6 **A.** No.
- 7 **Q.** I mean, we've heard from, for example, Patrick Bourke
- 8 and Mark Davies, both of them previously worked in the
- 9 Civil Service or as Special Advisers. You weren't aware
- 10 of them before?
- 11 **A.** No, I hadn't dealt with them in my previous life, no.
- 12 **Q.** In your role at the Post Office, you were Chief of Staff
- 13 to Paula Vennells; is that correct?
- 14 **A.** Yes.
- 15 **Q.** If we could bring up your witness statement onto screen,
- 16 please, and if we could start paragraph 4. You've set
- 17 out your evidence as to the role that you played. It
- 18 begins at paragraph 4. About halfway down you say as
- 19 follows:
- 20 "A major part of the role involved coordinating and
- 21 editing numerous briefings, reports and correspondence,
- 22 either going to [Paula Vennells] (for example to prepare
- 23 her for meetings) or being issued from her, such as
- 24 letters to external stakeholders or updates to the [Post
- 25 Office] Board. The substance and technical detail for

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- 1 **A.** So please could we delete "POL's prosecution process"
- 2 and replace that with "the Cartwright King review".
- 3 And to explain, at the time, in preparing my witness
- 4 statement, I hadn't seen the Altman advice and I was
- 5 relying on a secondhand summary of that advice, which
- 6 led me to believe the quote of "fundamentally sound"
- 7 referred to the prosecution process in general.
- 8 Having now seen the Altman advice, I understand he
- 9 was specifically referring to the Cartwright King
- 10 review.
- 11 **Q.** Thank you very much. That statement can come down, and
- 12 the statement will be uploaded onto the Inquiry's
- 13 website.
- 14 By way of background, after graduating university
- 15 you joined the Civil Service; is that right?
- 16 **A.** Yes.
- 17 **Q.** Where you worked for about 11 years?
- 18 **A.** Yes.
- 19 **Q.** I think you worked in the Treasury, UK Financial
- 20 Investments, the Home Office and the Scottish
- 21 Government; is that right?
- 22 **A.** Yes.
- 23 **Q.** Can you assist us with what grade you reached in the
- 24 Civil Service?
- 25 **A.** It was what was known as a Grade 7 in Civil Service

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- 1 these documents would typically come from the relevant
- 2 SMEs ..."
- 3 Is that Subject Matter Experts?
- 4 **A.** Yes.
- 5 **Q.** "... for the topic in question, and my role was to edit
- 6 this information to ensure the end product was suitably
- 7 clear and succinct for the target audience."
- 8 If we move to paragraph 31, which can be found at
- 9 page 11, you say, in broadly similar terms:
- 10 "My role as part of [Paula Vennells'] office was to:
- 11 (a) ensure the briefing was provided on time to inform
- 12 the engagement; (b) edit the document to ensure that it
- 13 covered an appropriate amount of detail, taking into
- 14 account the target audiences's time constraints; and (c)
- 15 make sure that it was clear and succinct. When the
- 16 topic was not entirely familiar to me, I would prepare
- 17 the draft briefing paper and then send it to the
- 18 [Subject Matter Expert] to check that the important
- 19 messages had been captured correctly and comprehensively
- 20 in my summary."
- 21 Turning to paragraph 50, that's at page 22, you say:
- 22 "My involvement with [Post Office's] preparation
- 23 for, and response to the Second Sight Interim Report was
- 24 consistent with the responsibilities of my Chief of
- 25 Staff role. As noted above, my role was primarily one

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1 of a conduit: to collate information from the relevant
2 business leads and SMEs, then to synthesise such
3 information into an accessible format for [Paula
4 Vennells], the Board or other audiences."

5 Moving on to paragraph 99, that's page 44, again,
6 similarly:

7 "I was not the [Subject Matter Expert] on any
8 particular issue, nor did I have any substantive
9 decision making accountabilities."

10 So it seems from your statement that your role was
11 principally one of a conduit, that you relied on Subject
12 Matter Experts and that you didn't have decision making
13 accountabilities; is that correct?

14 **A.** Yes.

15 **Q.** Moving now -- that can come down, thank you -- to the
16 initial months in your post, you became aware of the
17 Computer Weekly interest in matters relating to Horizon
18 quite early on; is that correct?

19 **A.** Yes, very soon after I'd joined, I was asked to join
20 Paula in a meeting with James Arbuthnot and Alan Bates,
21 for an update on the Second Sight investigation.
22 I think that was within two weeks of me joining, so as
23 part of getting ready for that meeting, I was brought up
24 to speed on the issues.

25 **Q.** Thank you. Sorry, one matter I forgot to ask you about.

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1 around stakeholder engagement and public affairs, we
2 need as a business to work more effectively at bringing
3 together our collective knowledge, particularly in the
4 Government space."

5 Were you aware of a greater degree of coordination
6 taking place in the business at this time, in respect of
7 the public responses to matters such as Horizon?

8 **A.** I think this email and the driver for it, it partly
9 related to the Horizon matters but I think it was
10 broader than that. There were lots of interactions
11 underway with Government at the time, funding
12 negotiations, seeking to win new business from
13 Government, discussions around the future of the
14 network. So I think the drive for greater coordination
15 was across all of those fronts.

16 **Q.** Was there a greater centralisation of company messaging?

17 **A.** There was certainly a desire for greater coordination,
18 lots of different bits of busy would come into contact
19 with the Government and I think there was desire from
20 the Communications Team to bring some more coordination
21 to that.

22 **Q.** "Key to this is a degree of discipline around planning
23 of meetings and coordination of messaging at such
24 meetings. Being more aware of what meetings are being
25 held and when will enable us to ensure that the right

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1 After your Chief of Staff position, you moved in 2014
2 and you became Group Strategy Director; is that right?

3 **A.** Yes.

4 **Q.** Then you have worked in various other roles since then
5 at the Post Office and you are still employed by the
6 Post Office?

7 **A.** Yes.

8 **Q.** What role do you currently have?

9 **A.** Currently Network Strategy and Delivery Director.

10 **Q.** Does that involve liaising with subpostmasters?

11 **A.** Yes.

12 **Q.** Thank you. I'm going to turn to my first document which
13 is relatively early on in your time at the Post Office.

14 It's a January 2013 email. Can we please turn to
15 POL00380018.

16 By this time, you've had a meeting with Second
17 Sight, James Arbuthnot and Alan Bates?

18 **A.** *(No audible answer)*

19 **Q.** Presumably you joined at a time when those kind of
20 issues, the Horizon issues, were rather prominent in the
21 company?

22 **A.** Yes, they were, yes.

23 **Q.** 29 January 2013. This is an email from Mark Davies,
24 Communications Director. He says as follows:

25 "As we move towards a greater degree of coordination

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1 messages are delivered, and that we can ensure clarity
2 of messaging. There is real reputational risk at play
3 when we don't have this oversight."

4 It then says, further down:

5 "Alongside this we are developing more disciplined
6 and coordinated approach to briefing materials", and it
7 sets out who is responsible for that.

8 Then it goes on to say:

9 "I will go into more detail on this when I update
10 [the Executive Committee] on the wider changes to our
11 communications approach. But as a first step I would be
12 grateful if you could ask your office and your team to
13 ensure:

14 "That all government ... and other stakeholder
15 meetings are communicated in advance ...

16 "The short readouts of all such meetings are sent to
17 [those two individuals] for appropriate cascade."

18 This was sent to you, presumably as part of Paula
19 Vennells' team at that time?

20 **A.** Yes.

21 **Q.** Could we please turn now to POL00097786. Moving now to
22 March of that year. This is an email from yourself to
23 Mr Davies and you say as follows:

24 "Would be good to have a quick word in the morning
25 about MP handling [regarding] the Horizon investigation.

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1 Paula asked me on Friday morning whether I still thought
2 it was the right call that we should not attend the
3 meeting with Arbutnot and co -- I said yes on balance,
4 but it might be sensible to get a separate opportunity
5 for her to engage directly with the relevant MPs, given
6 that she was persuasive and convincing in explaining
7 that we're taking this all seriously and are changing
8 culture of the Post Office ..."

9 So there was due to be a meeting of Members of
10 Parliament with James Arbutnot and the decision had
11 been taken that Paula Vennells shouldn't attend that
12 meeting; is that right?

13 **A.** Yes, as I recall, yeah.

14 **Q.** "I said I'd discuss with you."

15 You say at the bottom:

16 "Looking at the list, Tessa Munt is obviously a good
17 friend of ours (and fan of Paula) -- I wondered if it
18 was worth Paula speaking to her before the meeting to
19 feed in our side of the story. Although not without
20 risk, so I'm unsure. Let's discuss."

21 Now, in this email, you're not synthesising, you're
22 not gathering the views of Subject Matter Experts; it
23 does seem as though you are playing a role in the
24 advising Paula Vennells about her attendance at
25 a meeting. Is that a fair summary?

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1 Can you assist us, what was the meeting that was
2 taking place at this time?

3 **A.** I think the meeting was particularly to discuss --
4 I think it was about this time that the two bugs which
5 were disclosed to the Second Sight Report had been
6 shared with the Executive Team. As I recall, it was
7 a meeting with the likes of Lesley Sewell, Alwen Lyons,
8 Mark Davies and Paula. The primary purpose of the
9 meeting, as I recall, was to get more detail on those
10 bugs, and understand the detail behind them, but I think
11 it's the meeting then moved on to the wider progress of
12 the Second Sight investigation.

13 **Q.** If we scroll up, we can see your response. In the
14 second paragraph, you say:

15 "My only other concern at the meeting was around the
16 feasibility of some of the options/levers that [we]
17 raised. As discussed we need to think about a Plan B
18 given the likelihood that James wouldn't agree to delay
19 the meeting/report."

20 So at that point in time, there was discussion over
21 whether the Interim Report itself could be delayed or
22 not published; is that right?

23 **A.** Yes, certainly a range of options were raised at that
24 meeting.

25 **Q.** "We also need to be very careful not to overplay our

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1 **A.** Yes, that's a fair summary, yes. That would be part of
2 the role.

3 **Q.** Part of your role it seems, having been in the Civil
4 Service, I think you had a fair understanding of Members
5 of Parliament and perhaps that was an area in particular
6 that you considered you were able to advise on?

7 **A.** Yes, probably more so on the Government side than the
8 Parliamentary side. I think Mark Davies would have more
9 experience on the Parliamentary side but, yes,
10 I certainly brought experience of Government issues.

11 **Q.** So when we read your statement and those passages that
12 I've just been taking you to, where you set out your
13 role, can we add to that that did advise Paula Vennells
14 in respect of certain matters?

15 **A.** Yes.

16 **Q.** Can we turn to POL00098777. If we could start with the
17 bottom email, please. This relates to the handling of
18 Second Sight before the Interim Report is published and
19 this is an email from Ms Vennells to you, and she says
20 as follows:

21 "Martin, I wondered if you had any further thoughts
22 on [James Arbutnot].

23 "You were looking thoughtful throughout the meeting.
24 Although I didn't get the sense you were holding back --
25 you asked some good questions."

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1 hand with [Second Sight] -- they could turn out to be
2 quite dangerous if we threaten them with legal action or
3 attempt to replace them with another firm. Easy for
4 this to be portrayed in the media as heavy-handed
5 tactics because we don't like their findings (it plays
6 directly into the existing perceptions we're trying to
7 counteract)."

8 So it seems as though you are also advising Paula
9 Vennells in relation to media handling?

10 **A.** I mean, less media handling -- handling of issues
11 generally, she would sometimes ask for my advice on,
12 yes.

13 **Q.** "So I think we're stuck with the softer option of
14 explaining to [James Arbutnot] calmly but firmly why he
15 cannot allow Second Sight to disseminate a misleading
16 Interim Report -- it either needs to be delayed or
17 repositioned as a very neutral status update (with more
18 detail on the one case that has been resolved)."

19 He can't allow Second Sight to disseminate
20 a misleading Interim Report; what was misleading about
21 the Interim Report?

22 **A.** So we haven't seen the report at this stage but the team
23 which were working directly with Second Sight were
24 concerned about the direction it could go, there was --
25 the impression conveyed by the team was that there was

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1 a risk they might make statements before the evidence
2 had been gathered. There was a lot of pressure from
3 Parliamentary stakeholders to get a report out before
4 summer recess and there was a concern that that report
5 wasn't going to be fully evidence based.

6 **Q.** It seems as though you have formed the view, though, in
7 this email that it was going to be a misleading Interim
8 Report. If that's the case, where did you form that
9 view from?

10 **A.** So, I don't think -- I hadn't formed that view
11 independently. That was the concern being conveyed by
12 the team working with Second Sight. The team were
13 concerned about that risk and a range of options were
14 being discussed about how to handle that. I think I was
15 steering the conversation away from some of what felt to
16 be more overly aggressive options.

17 **Q.** What was your personal individual knowledge about what
18 the Interim Report was likely to say?

19 **A.** I was wholly dependent on what the team were briefing us
20 on this. I had no direct insight into the reports.

21 **Q.** Who was the team?

22 **A.** So the team closest to it is Susan Crichton, Simon
23 Baker, Lesley Sewell, Alwen Lyons.

24 **Q.** The passages I took you to in your witness statement
25 earlier, about the involvement of Subject Matter

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1 "Do you need me to dig out any more on this?
2 I think the key point is that the fact that Horizon did
3 have bugs has been discussed in court and [the Post
4 Office] still won the case."

5 If we scroll up to the top, we can see that Lesley
6 Sewell emails a limited number of individuals: Alwen
7 Lyons, you and Mr Davies, on an FYI basis. Why that
8 small number of people? What did you, the three of you,
9 have in common that needed that information drawn to
10 your attention?

11 **A.** So, again, I think this was a follow-up to -- it was
12 about this time that the two bugs which were disclosed
13 in the Second Sight Report -- and I think what was known
14 as the Falkirk bug, the earlier bug, had been shared
15 with the Executive Team, and Lesley in particular was
16 tasked with getting more detail and background on these.
17 I think she reached out to Gareth Jenkins for --
18 particularly on the Falkirk bug. So I think this was
19 a follow-up to that action and conversation.

20 **Q.** Why to you?

21 **A.** I was part of that -- I was part of that group
22 discussing how we respond to the Second Sight Report.
23 I'd been in that earlier meeting which Paula had asked
24 me to join.

25 **Q.** What did you know about Gareth Jenkins at that time?

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1 Experts, this is you giving advice to Paula Vennells in
2 relation to handling James Arbuthnot, handling Second
3 Sight. There's no direct involvement here of any
4 Subject Matter Experts, is there?

5 **A.** Not -- no, not in this specific email, but it's
6 a follow-on from a meeting with the Subject Matter
7 Experts.

8 **Q.** Who would you consider the Subject Matter Experts, in
9 relation to the matters being discussed here, are?

10 **A.** So I think, on the contents of the Second Sight Report
11 itself, it was the team who were directly interfacing
12 with them.

13 **Q.** Who is that? The names you mentioned --

14 **A.** The names I just mentioned before, yes.

15 **Q.** Can we please turn to POL00098778. Thank you. So
16 a very similar time. This is the day after that email
17 exchange. If we scroll down, we can see that Gareth
18 Jenkins emails Lesley Sewell, attaching his witness
19 statement from the earlier Seema Misra case. He says:
20 "This was heard in Guildford Crown Court in October
21 2010 and concerned West Byfleet Post Office.
22 "Page 14 covers my response to a problem that had
23 been identified in an earlier case, (that involving Lee
24 Castleton who took [Post Office] to court for unfair
25 dismissal which he lost).

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1 **A.** Nothing at all at that time.

2 **Q.** Did you ask Lesley Sewell, "Who is this? What's this
3 all about?"

4 **A.** I don't recall any follow-up conversation to this.
5 I mean, I saw the -- I saw his role description at the
6 bottom of the email, described a Distinguished Engineer
7 at Fujitsu, and kind of took it from that that he was
8 the relevant expert on this topic.

9 **Q.** At this point in time, had you had any discussions with
10 Paula Vennells about Gareth Jenkins?

11 **A.** No.

12 **Q.** Could we please turn to POL00098806. This is the same
13 day. The top email is from Mark Davies, again, to the
14 small group. He says:
15 "This is massively important.
16 "Is there any possibility that all incidents -- 14
17 and 64 [those are the two bugs that you've mentioned] --
18 have been referenced in court?"

19 So Mark Davies seems to have seen it as massively
20 important, possibly because it showed that the Post
21 Office had previously disclosed the existence of a bug
22 in a court case. What did you do to familiarise
23 yourself with those underlying issues?

24 **A.** I don't recall any specific action myself. I think
25 there'd already been action underway to get more detail

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1 about the bugs themselves and, if I recall, off the back
2 of this, the Legal Team were tasked with understanding
3 what had been disclosed previously in court cases.
4 I don't recall seeing a follow-up to that.

5 **Q.** There is then a meeting with James Arbuthnot on 3 July.
6 So soon after. I'm just going to begin by taking you to
7 2 July. Can we please start with POL00190092. By this
8 stage, you are part of group who is drafting a briefing
9 for Paula Vennells and Alice Perkins, I think in
10 relation to a discussion with James Arbuthnot; do you
11 remember that brief?

12 **A.** Yes.

13 **Q.** Thank you. If we look at the bottom of the page, we can
14 see an email from Susan Crichton to you and to Mark
15 Davies as well, and it's sent from, it says, Alwen at
16 Susan. They say:

17 "Susan and I have pulled this together with help, so
18 it is now over to you, to work your magic and send on
19 the final document to Paula, Alice and me tonight."

20 So this, I think, the day before the meeting with
21 James Arbuthnot?

22 If we scroll up, we can see your first response, and
23 you say as follows:

24 "On the prosecution section of the brief there is
25 a half-finished sentence (see blow) -- what were you

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1 (and this is why some prosecutions are still happening)?
2 Presumably there is some kind of reasonableness test
3 here -- ie a [subpostmaster] can't just get off
4 scot-free by saying it's an Horizon issue, irrespective
5 of the circumstances?"

6 Then below that, it has a section that had been
7 drafted and that had been sent to you and that reads as
8 follows:

9 "Prosecutions

10 "Where cases have been preferred to [Second Sight]
11 via JFSA these are subjective to the immunity agreement.
12 Where we have investigated subpostmasters since the
13 start of the [Second Sight] work, and the subpostmaster
14 has said that the Horizon computer systems has been key
15 to the issues that have arisen in the branch we have not
16 taken action against the subpostmaster."

17 So the immunity agreement was, if a case was lodged
18 with Second Sight, there would not be a prosecution?

19 **A.** Yes.

20 **Q.** Then it continues:

21 "Where [the Post Office] takes legal action against
22 a ... "

23 Then if we scroll up, that hadn't been completed in
24 the draft that you received; is that right?

25 **A.** Yes. So that was the sentence I was querying with Susan

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1 planning to say?! Was this going to cover the issue
2 around previous convictions? If not, what is our best
3 possible defence against the suggestion that this
4 process had called into question the validity of
5 previous prosecutions? Think we definitely need a line
6 on this."

7 So, at this stage, you were aware that there was
8 a concern that had been raised that Second Sight's
9 findings could potentially call into question the
10 validity of previous prosecutions?

11 **A.** I was aware it was a question which James Arbuthnot had
12 raised in previous meetings with Paula, so it felt
13 necessary to ensure she had a position to take on that.

14 **Q.** Not just a position to take but a defence against that
15 suggestion?

16 **A.** Yes, informed by -- so, at this point, we hadn't seen
17 the final report but the preliminary view from Susan
18 Crichton and the Legal Team was there was nothing at
19 this stage to expect that it would change the safety of
20 previous convictions.

21 **Q.** It then says:

22 "On the first bullet below, presumably we should add
23 a sentence to state that where it is clear that the
24 Horizon system isn't the issue at stake, we have a duty
25 to protect public money by pursuing appropriate action

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1 and asking her to complete it.

2 **Q.** Then if we scroll up, we can see Susan Crichton saying
3 to yourself and others:

4 "Hugh and I are just discussing will get back to you
5 shortly."

6 We can see a continuation of this issue at
7 POL00190132.

8 Thank you. Now, we have to be a bit careful reading
9 this email. If we scroll down, the best way to read it
10 is to begin with Susan Crichton's email, which is the
11 final substantive email on the page. Then she has made
12 comments below on the original email. So she says as
13 follows:

14 "Martin -- following your conversation with Hugh, he
15 and I have discussed and I think that this is the best
16 wording we can use (see below). The bottom line is that
17 this dialogue and resulting potential publicity -- could
18 increase the risk of appeals being made against previous
19 convictions, we have no reason to believe that those
20 appeals would be automatically successful we would have
21 to deal with each on a case-by-case basis. There would
22 be significant cost implications.

23 "It is interesting that neither of us can think of
24 one."

25 So it seems as though she is outlining there to you

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1 that there is an increased risk of appeals and, although
2 they wouldn't be automatically successful, they'd have
3 to be dealt with on a case-by-case basis?

4 **A.** Yes.

5 **Q.** Then, if we scroll down, we can see how she has filled
6 in that prosecution section. It now reads:

7 "Where cases have been referred to [Second Sight]
8 via JFSA they are subject to the terms of the immunity
9 agreement, which allows non-MP generated cases to be put
10 before the JFSA and/or [Second Sight].

11 "For criminal prosecutions we treat each matter on
12 a case-by-case basis, with an investigation and legal
13 review (generally involving external lawyers). We have
14 a duty to protect public money and take appropriate
15 action to safeguard such public money.

16 "In the event that any concern considers that there
17 has been a miscarriage of justice they have the right to
18 apply to the Court of Appeal to have their conviction
19 reviewed."

20 We can see your response on the first page. You
21 say:

22 "Thanks both.

23 "On the point about current investigations/
24 prosecutions, that's a significant weakening of the
25 reassuring line we discussed earlier. Can we add

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1 publicity -- could increase the risk of appeals being
2 made against previous convictions, we have no reason to
3 believe that those appeals would be automatically
4 successful. We would have to deal with them on
5 a case-by-case basis".

6 She has amended the wording with some more balanced
7 and neutral wording over the page. Your comment there,
8 if we scroll up slightly, for example, on the past
9 convictions:

10 "... can we say that we're not aware of any cases
11 there we believe an appeal would now result in
12 a different judgment ..."

13 Where did you get that information from? You said
14 you spoke to Subject Matter Experts and that you relied
15 on Subject Matter Experts. Susan Crichton is a Subject
16 Matter Expert. You're proposing amending wording.
17 Where did that come from?

18 **A.** Well, I am asking her the question. In her covering
19 email, I think the -- if we could scroll back up to
20 it --

21 **Q.** Down, I think.

22 **A.** Sorry.

23 **Q.** Yes.

24 **A.** I think I took this -- this covering email and the
25 previous dialogue as quite reassuring. She includes the

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1 something along the lines of 'since start of
2 investigation we have not pursued action against
3 [subpostmasters] where it is apparent that Horizon
4 system may be involved'?"

5 Just pausing there, where did you get that
6 information from?

7 **A.** I think it had been conveyed to me by Susan and Hugh.

8 **Q.** The second paragraph says:

9 "And on past convictions, if pushed, can we say that
10 we're not aware of any cases where we believe an appeal
11 would now result in a different judgment (but clearly we
12 need to take these on a case-by-case basis)? Difficult
13 not to say something like this ..."

14 What research had you undertaken to be able to draft
15 both of those lines?

16 **A.** So these were -- as I referred to in the earlier emails,
17 there'd been conversations with Hugh and Susan about the
18 preliminary interpretation of the -- the implications of
19 this. So this wasn't based on personal research; this
20 was based on the messages I'd been given to them earlier
21 (*sic*).

22 **Q.** The message is below though, isn't it? The message is
23 from Susan Crichton below. If we scroll down, we can
24 see what she says. She says:

25 "The bottom line is that dialogue and resulting

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1 words "We have no reason to believe that those appeals
2 would be automatically successful", and goes on to say,
3 "It's interesting that neither of us can think of one",
4 which I interpreted to mean that neither of us can think
5 of grounds for a successful appeal. So that covering
6 email was reassuring and all of my dialogue which --
7 with Susan and Hugh, which preceded this email
8 exchange -- had been quite reassuring and strong on this
9 point, and it felt that Paula was clearly going to be
10 pushed quite hard on this point in the meeting with
11 James Arbuthnot, so I want to -- I'm basically asking
12 the team to give us the best line they felt comfortable
13 with.

14 **Q.** But you're changing the line that she has provided you
15 with?

16 **A.** I'm asking "Can we say what you've said elsewhere and in
17 your covering email?"

18 **Q.** If we scroll up, we can see you you're also
19 communicating thoughts from Mark Davies. You say:

20 "Mark just raised a similar point (with slightly
21 different suggestion on language)."

22 Are you quoting below from Mark Davies or is this --

23 **A.** Yes, I think that text in the darker font is a cut and
24 paste from an email from Mark.

25 **Q.** So it seems as though Mark Davies had said:

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1 "Do they need an if pressed line on miscarriages of
2 justice? 'Nothing has emerged in this report to suggest
3 a wrongful conviction. Cases have been through the
4 judicial process and we have never relied entirely on
5 Horizon in any court case'."

6 Your witness statement refers throughout to reliance
7 on Subject Matter Experts but it does seem as though we
8 have the Head of Communications here and the Chief of
9 Staff, drafting quite significant lines to take. Do you
10 agree with that?

11 **A.** I'd agree we're absolutely reiterating the lines to take
12 with the subject matter experts, I personally wouldn't
13 have put anything into a brief. I wouldn't have amended
14 something as significant as this in a brief without
15 checking back with the relevant Subject Matter Experts
16 and ensuring they were comfortable with this.

17 **Q.** Okay, so --

18 **A.** So we are --

19 **Q.** Before the final version is agreed, you would go back to
20 the Subject Matter Expert and consult them and ensure
21 that it's accurate and fair?

22 **A.** Yes, absolutely. I mean, all of this, as you can see,
23 is unfolding quite late at night, the day before the
24 meeting. So it's kind of very much happening in real
25 time. But what I'm not doing is unilaterally altering

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1 So now we're at 11.00 at night, we have below Mark
2 Davies email but, again, we'll have to read that a bit
3 carefully because that's his email but with your
4 comments within it. So if we scroll down, he says:

5 "Current version is pretty weak.

6 "The speaking note needs to be firmer -- we want to
7 make clear our position and underline our view that no
8 evidence to support the systemic failures .

9 "It should specifically address the BBC point ."

10 I think this is your wording in capitals, is it?

11 **A.** Yes.

12 **Q.** "WHAT POINT SHOULD WE MAKE. GRATEFUL FOR SOME WORDS.

13 "A really key point is that we should not guarantee
14 to agree our media lines with [James Arbuthnot]. If he
15 comes out strongly as it sounds as though he will, we
16 will have no choice but to come back strongly. So am
17 concerned about the line where it talks about agreeing
18 media statements."

19 You say:

20 "SO SHOULD WE REMOVE THIS ALTOGETHER? DIFFICULT TO
21 ASK FOR HIS MEDIA STATEMENT WITHOUT OFFERING TO SHARE
22 OURS ..."

23 He then says:

24 "There needs to be a line in there about Fujitsu if
25 there isn't currently."

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1 the brief and putting it direct to Paula; I'm iterating
2 it with the input of the Legal Team.

3 **Q.** So Susan Crichton there being the Subject Matter
4 Expert --

5 **A.** Yes.

6 **Q.** -- and you're relying on her to ensure that the changes
7 you're making are accurate?

8 **A.** Yes, and that they are comfortable with the position
9 we're taking. And to reiterate, I'm not -- on any of
10 those suggestions on wording, they're not things which
11 I have invented; they're things which have come either
12 from the preceding emails from Susan or the preceding
13 dialogue.

14 **Q.** We can continue this chain. There's a separate chain,
15 I think, with Mr Davies. Can we please turn to
16 POL00297040.

17 So this email, the top one, I think 10.41 at night,
18 so this is a late-night discussion.

19 If we could turn to the third page, please, of
20 POL00297040. Page 3, we have an email from you, just
21 above one from Mark Davies. Thank you. So you write
22 here:

23 "Thanks -- questions/comments below. Current draft
24 attached (so far I've only reworked the summary box, but
25 that's the key section I think)."

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1 Your response "WHAT LINE?"

2 He says:

3 "I think it needs to be upfront in addressing the
4 issue where [James Arbuthnot] is said to be angry -- the
5 prosecutions and the new evidence.

6 "On training we need to be very careful about
7 language -- the current version is too loose -- this is
8 your point about not leaving any glimmer which suggests
9 that cases might need to be reopened."

10 So he says "this is your point about not leaving any
11 glimmer which suggests that cases might need to be
12 reopened". What was your point there about not leaving
13 a glimmer?

14 **A.** I mean, I don't recall specifically saying that but
15 I guess the general concern at the time, this was
16 clearly a major question for James Arbuthnot. He had
17 raised the question of past convictions. The emerging
18 advice we were getting from the Legal Team at the time
19 was, as we've seen that they didn't see grounds for --
20 yes, there may be more appeals but they didn't see
21 grounds for, let's say, successful appeals and I guess
22 what we're anxious to do is to avoid raising
23 expectations externally on the basis of the Interim
24 Report hadn't even been published yet so it's about --

25 **Q.** So --

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1 A. -- managing expectations.
 2 Q. -- "not leaving a glimmer" is about managing
 3 expectations, is it?
 4 A. Managing expectations on the basis of the evidence we
 5 had at that point and the emerging interpretation of
 6 what that evidence meant.
 7 Q. He says:
 8 "So we need to acknowledge that training can always
 9 be improved (rather than our training must be
 10 improved -- important difference) and need to follow
 11 that with further statement that there is no evidence of
 12 systemic failures.
 13 "The brief needs to make clear that none of the 14
 14 or the 62 [those are the two bugs mentioned in the
 15 Interim Report] impact on the spot reviews on the
 16 Interim Report and are therefore not relevant to the
 17 Interim Report."
 18 "We shouldn't call the user group a 'Horizon' user
 19 group -- makes it clear we are acknowledging issue with
 20 Horizon -- branch management user group?"
 21 You say:
 22 "CAN WE CALL IT A HORIZON SUPPORT USER GROUP?"
 23 So you're there discussing how to rename the group
 24 so that it didn't sound like it affected the computer
 25 system; is that right?

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1 ..."
 2 If we scroll back up now to the previous page -- in
 3 fact, if we start on the second page -- Mr Davies has
 4 seen a further rewrite from yourself. We're now at
 5 11.38 at night. He says:
 6 "I think in the main body we really need to
 7 emphasise more that there is no connection between the
 8 14 in the 64 and the spot review ..."
 9 Is that possibly "to prosecutions", so no link to
 10 the prosecutions?
 11 A. I think so, yes.
 12 Q. "Do they need an if pressed line on miscarriage of
 13 justice? 'Nothing has emerged in this report to suggest
 14 a wrongful conviction. Cases have been through the
 15 judicial process and we have never relied entirely on
 16 Horizon in any court case'.
 17 That's the comment I think you made in the other
 18 chain, isn't it?
 19 A. Yes.
 20 Q. "I'd like to use the bit at the bottom of my email,
 21 reproduced here for ease of reading."
 22 And he has repeated -- if we scroll down, there's
 23 another email from him that was slightly earlier.
 24 Can we please now turn to page 1., and the bottom
 25 email there is from you. You say:

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1 A. Yes.
 2 Q. "Can you send final version to me before it goes wider
 3 so I can go through one more time? Will look back on
 4 notes to see what missed?
 5 "Overall it didn't feel to me that it captured
 6 Alice's views and I think she was right to be so clear.
 7 "It may be worth setting out three overall 'rocks'
 8 for the two of them to return to:
 9 "[The first rock being] there is no evidence in the
 10 Interim Report to support any suggestion of systemic
 11 failures.
 12 "[Second] this is a system which deals with six
 13 million transactions a day or more than 40 million
 14 a week [et cetera].
 15 "we must be satisfied that when the report is
 16 released it truly reflects the position -- the Post
 17 Office business is too important to too many people for
 18 faith to be questioned unfairly.
 19 "Another point which needs bringing out is the
 20 public money point ..."
 21 Then a further paragraph, and this is the kinds of
 22 figures that we've seen in a number of lines over the
 23 years:
 24 "... many convictions over what period compared with
 25 [what number of] transactions in 11,800 branches etc

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1 "Many thanks, I will integrate your language below,
 2 which is spot on.
 3 "Exchanging phone calls/emails with Susan and Hugh
 4 to try to pin them down on the prosecutions point ...
 5 I agree we need something fairly clear if pressed on
 6 miscarriages of justice ...
 7 "The whole brief needs rewriting, infuriating!"
 8 If you scroll up we can see there's a discussion
 9 about whether you're doing it now -- sorry, if we scroll
 10 down, slightly, mark Davies emails you to say:
 11 "Are you doing it now? Doesn't seem right! I am
 12 happy to have a go if you prefer."
 13 So this is almost at midnight. The two of you are
 14 together rewording it, and your response:
 15 "Sorry, just saw this, not ignoring you! Yes, I'm
 16 doing it now."
 17 You're after midnight now, it's 12.17:
 18 "Not right that either of us should have to rewrite
 19 so significantly at this time of night!"
 20 So it seems as though between the two of you, you
 21 are significantly rewriting the wording that was sent to
 22 you by the Subject Matter Experts; is that a fair
 23 summary?
 24 A. I think that's fair, yes.
 25 Q. As it happened, on this particular day -- the Inquiry

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1 has seen evidence, I don't need to take you to it, the
2 reference is POL00380985 -- this was a day where there
3 is another email distribution relating to non- emotive
4 language for the use of bugs and the response from
5 Ms Vennells is exception or anomaly; do you recall that
6 exchange?

7 **A.** I do, having seen it come up in other hearings, yes.

8 **Q.** Yes, and you are a recipient of that email?

9 **A.** Yes.

10 **Q.** So quite a lot to is going on at this particular day
11 before the James Arbuthnot meeting?

12 **A.** There is, yes.

13 **Q.** Can we please turn to POL00145089.

14 Did you sleep at all that night? It seems as though
15 it was a particularly late night.

16 **A.** It was a late night, yes.

17 **Q.** So I think the actual final lines that were circulated
18 quite early -- in fact, if we look at POL00145089, and
19 we look at page 2, we can see that you send it through
20 at 2.04 in the morning:

21 "Alice, Paula

22 "With many thanks to Susan, Alwen, Mark and everyone
23 else involved, here's the briefing note for the meeting
24 with [James Arbuthnot]."

25 If we scroll down we can see the speaking notes. So
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1 a case-by-case basis, with a detailed investigation and
2 legal review (generally involving external lawyers)."

3 Then there's a section on "Historical convictions",
4 and it's this passage, I think, that formed the final
5 version of what was being discussed. It says:

6 "Nothing has emerged from the interim findings given
7 to us by [Second Sight] which would point to specific
8 convictions being unsafe. Cases have been through the
9 judicial process and the Court considers all relevant
10 evidence not just that relating to the Horizon computer
11 system.

12 "In the event that any person considers that there
13 has been a miscarriage of justice they have the right to
14 apply to the Court of Appeal to have their conviction
15 reviewed."

16 Over the page, we have a heading "System
17 exceptions", so that is in line with that email
18 correspondence about, we see here, exceptions and then,
19 in brackets, anomalies:

20 "... under the current Horizon system [we know of
21 two of them].

22 "Key point to note is that in both cases our
23 processes picked up these issues, appropriate remedial
24 action has been taken and they did not lead to any
25 disciplinary action against the affect [subpostmasters].
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1 it's been sent in a Word document but also a PDF and
2 it's copied below, "Brief for meeting with James
3 Arbuthnot, 3 July".

4 If we scroll down, we can see speaking notes. If we
5 carry on down to the fourth page, we see there, there's
6 a section on current prosecutions. There we go. I'm
7 just going to read a few passages out from that
8 briefing, so this is the final version that is sent to
9 Paula Vennells:

10 "Current prosecutions

11 "Since the start of the [Second Sight] investigation
12 we have not pursued a criminal conviction which relies
13 solely on Horizon computer system evidence. We have
14 also put on hold civil recovery proceedings in certain
15 cases while we await final report.

16 "As you know, we had prepared an 'immunity
17 agreement' with the JFSA to provide reassurance to
18 [subpostmasters] thinking of submitting evidence to the
19 process."

20 So those are the kinds of lines that we saw earlier
21 in that earlier draft about the immunity agreement:

22 "But in cases where it is clear that the Horizon
23 system isn't the issue, we have a duty to take
24 appropriate action to safeguard public money. For
25 criminal prosecutions we treat each matter on
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1 "Absolutely no reason to believe that there are
2 other undiscovered issues."

3 Could we please turn to the first page. If we
4 scroll down to the middle email, please, Paula Vennells
5 has thanked you for it, and you say:

6 "I think sharing with BIS [the Department for
7 Business] would be helpful -- I know they would
8 certainly appreciate it. I'll just re-read to check for
9 any issues which could be misinterpreted or unhelpful to
10 our position, but otherwise I'll forward ... unless
11 anyone objects ..."

12 Just pausing there, "unhelpful to our position", the
13 Department for Business were your sole shareholder, what
14 might it be that would be unhelpful to your position?

15 **A.** I'm not sure, I think I was making the -- Paula had
16 said -- suggested that we forward it on to the BIS team.
17 I'm not sure I was referring to any specific risks,
18 I think I was just conscious this was a brief which had
19 been prepared for an internal audience, rather than the
20 BIS audience because, obviously, I would want to check
21 it was also suitable for the BIS audience.

22 The types of issues which -- I mean, there were
23 concerns at the time around the progress of the
24 investigation, how long it was going to -- how long it
25 had taken, how long it was going to take going forwards,
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1 the costs involved. So I think I would have wanted to
2 check that everything that was in the brief was
3 consistent with what we had briefed with the BIS team
4 on -- or, you know, was there anything in particular
5 which we need to explain to them.

6 **Q.** What was the position? Why might it be unhelpful to
7 your position; did you have a particular position in
8 respect of the Department for Business?

9 **A.** I'm not sure what I was referring to specifically there,
10 I think it was the whole conduct of the investigation,
11 what we had found from it so far, what the next steps
12 were.

13 **Q.** You then say that you'll send it to the Executive
14 Committee on behalf of Paula.

15 Now, can we turn to the top email, please. This is
16 a response from Susan Crichton, she says:

17 "Hi there -- so I have not read the reworked
18 document, are you happy that there are no hostages to
19 fortune? We shouldn't send Rod's note as there is
20 updating required."

21 So earlier your evidence was that you would have
22 consulted with the Subject Matter Experts before
23 finalising. It's clear here, the lawyer who is, to some
24 extent a Subject Matter Expert, hasn't in fact read the
25 briefing. Now, it's been drafted very late at night

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1 you edited things for clarity. But here we have, late
2 at night between yourself and the Head of
3 Communications, a significant reworking of a briefing,
4 and it's very clear here that it hadn't been seen by the
5 Subject Matter Experts, the final version; is that
6 right?

7 **A.** Yes, I mean, she clearly hadn't re-read the whole
8 reworked document.

9 **Q.** Are we to read into your witness statement an additional
10 line that is that your role also involved deep
11 involvement in briefing Paula Vennells in relation to
12 matters affecting the Horizon system?

13 **A.** So, I was absolutely at points in time involved in
14 pulling together and editing briefs which went to Paula
15 on the Horizon system. I don't believe -- whilst it
16 involved a significant rewrite, I think a lot of that
17 would have been around how the brief was structured, the
18 clarity of the messaging, how the key points were
19 highlighted in the brief. I don't believe I would have
20 been unilaterally changing the substance of what was
21 contained in the brief without that being signed off by
22 the Subject Matter Experts.

23 **Q.** But we saw the communications with Mark Davies,
24 complaints about how weak it was in certain points --
25 "needs to be firmer". You were strengthening up the

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1 between yourself and the Head of Communications, and
2 sent to the CEO, potentially going to the Department for
3 Business and the Executive Committee.

4 That's problematic, isn't it?

5 **A.** I mean, I think it's fair to say clearly the whole
6 last-minute construction of this brief was very far from
7 ideal. It's not the right way to be constructing briefs
8 on such important topics. What you saw in the earlier
9 email exchange was the iteration of specific topics.
10 I know alongside the email exchange, there are also
11 telephone calls, and I think I refer to them in my
12 email, particularly with Hugh, and I think we saw in the
13 final briefing that the wording on -- particularly on
14 past prosecutions, had evolved from the suggestion/
15 questions in my email exchange. So I can't recall the
16 exact sequence but I think there clearly had been
17 iteration and input from a combination of Susan and
18 Hugh.

19 So I would completely admit this was a far from
20 ideal way of constructing a brief and getting it
21 properly signed off. It was far too last minute but
22 they had been involved in the process.

23 **Q.** It's not just the timing though, is it? It's the people
24 as well. I mean, in your witness statement, you've been
25 very careful to set out that you were a conduit, that

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1 wording, weren't you, not just making it clearer, but
2 also strengthening it and had --

3 **A.** Yes, there was --

4 **Q.** -- to *(unclear)* --

5 **A.** Yes, there was clearly some substantial input from Mark
6 on the wording.

7 **Q.** Mark and yourself?

8 **A.** I'm -- yes, I mean, I'm holding the pen on the overall
9 brief. I think a lot of the specific wording changes
10 came from Mark.

11 **Q.** Would you describe Mark as a Subject Matter Expert?

12 **A.** Clearly not on legal affairs and IT affairs.

13 **Q.** Was it appropriate for somebody with expertise in
14 communications to be so heavily involved in drafting
15 such a brief?

16 **A.** I think it was appropriate for the Communications
17 Director to be involved in the iteration of the brief.
18 It wouldn't be appropriate for the Communications
19 Director to fundamentally change the message of the
20 brief without the Subject Matter Experts being
21 comfortable with that.

22 **Q.** I'm going to move on to Second Sight, and the report and
23 the response. Could we please turn to POL00099021,
24 please.

25 We're now on 5 July. If we could turn to the second

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1 page, Paula Vennells has circulated:
 2 "... a brief email to update [the recipients] on
 3 where we are with the Second Sight investigation."
 4 If we turn to the first page, you have drafted,
 5 presumably from what she sent you but also from
 6 discussions -- if we scroll up to the top -- a suggested
 7 draft email to the Board.
 8 Do you recall how you came about drafting this email
 9 to the Board?
 10 **A.** Well, I mean, it was -- consistent with part of my role
 11 would be to draft correspondence on behalf of Paula.
 12 I think it would have been the synthesis of
 13 conversations with her and with others on the team
 14 working on this, and it was pulling that together into
 15 a draft.
 16 **Q.** If you say there:
 17 "Obviously the points about the ombudsman and past
 18 prosecutions could set hares running, but equally we
 19 probably do need to register these issues with the Board
 20 at this stage. Obviously feel free to change or expand
 21 the drafting."
 22 What do you mean by "set hares running"?
 23 **A.** I assume what I meant -- at this point I'm not sure
 24 there had been much conversation with the Board about
 25 the implications of the Second Sight Report for past

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1 **Q.** Doesn't "set the hares running" suggest some sort of
 2 negative implication: things that shouldn't be taking
 3 place, things that --
 4 **A.** I don't think I would have -- no, I don't think that's
 5 what I meant by that phrase. I don't think I'd be
 6 suggesting it would be inappropriate for the Board to be
 7 asking questions about that. Not at all.
 8 **Q.** If we could scroll down, please, we can have a look at
 9 the penultimate bullet point. This is a draft brief to
 10 the Board. It says as follows:
 11 "One of the main reputational and potentially
 12 financial risks arising from the review relates to
 13 possible attempts to reopen past prosecutions based on
 14 the findings. James Arbuthnot was certainly focused on
 15 this point. Susan and the Legal Team are working with
 16 our external lawyers to consider whether there are any
 17 implications arising from the report for past cases, and
 18 we can provide a further update on this work next week."
 19 This is, in particular, the paragraph that you were
 20 concerned about setting hares running, was it?
 21 **A.** Yes, as I say, I think this was probably going further
 22 than had been briefed to the Board previously.
 23 **Q.** "One of the main reputational and potentially financial
 24 risks"; how about human impact, impact on individual's
 25 lives, possible attempts to reopen past prosecutions?

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1 prosecutions, and I think what the email's raising
 2 possibly for the first time is it could result in more
 3 appeals being made. So it's kind of recognising that
 4 that maybe new news or going further than some of the
 5 previous briefings to the Board.
 6 **Q.** Are the hares running from the Board, so is the
 7 suggestion that it could get the Board asking questions
 8 about past prosecutions, and that was something of
 9 concern?
 10 **A.** Yes, I mean, I think it must have meant -- I think I was
 11 absolutely referring to the potential reaction of the
 12 Board.
 13 **Q.** Why would that be a concern?
 14 **A.** Why would -- why would what be a concern?
 15 **Q.** Isn't the Board's purpose to ask questions, to
 16 scrutinise; what would be wrong with setting hares
 17 running at Board level in relation to past prosecutions?
 18 **A.** I don't think I'm saying there's anything wrong with
 19 them asking questions. I think, clearly, that would be
 20 their role too. I think I'm just highlighting that
 21 this, as I understood it, was perhaps going further than
 22 Paula had briefed the Board on previously. So, you
 23 know, be aware this may well provoke questions. I don't
 24 think I was suggesting there was anything inappropriate
 25 about that.

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1 I mean, might have been an impact for the Board that
 2 people had been wrongly prosecuted?
 3 **A.** Absolutely, and clearly, in hindsight and everything we
 4 know now, it absolutely should have been the top
 5 concern. At the time, the view of the business wasn't
 6 that the previous prosecutions had been unsound.
 7 **Q.** But that's what James Arbuthnot was saying, wasn't he?
 8 He was concerned --
 9 **A.** Yes.
 10 **Q.** -- about actual humans, individuals being prosecuted --
 11 **A.** (*The witness nodded*)
 12 **Q.** -- and having been prosecuted when they should not have
 13 been.
 14 **A.** Yes, yeah. I think it's completely fair to say this
 15 email reflects the mindset of the business at the time,
 16 and there wasn't a -- there clearly wasn't enough focus
 17 on the actual safety of those prosecutions and the human
 18 impact.
 19 **Q.** The second half of that sentence -- of that paragraph,
 20 sorry:
 21 "Susan and the Legal Team are working with our
 22 external lawyers to consider whether there are any
 23 implications arising from the report for past cases ..."
 24 So we're here at 5 July, you were aware that Susan
 25 Crichton was working with an external law firm to

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1 consider the implications; is that right?

2 **A.** Yes.

3 **Q.** The Second Sight Report itself was dated 8 July. Can we

4 have a look at that day. Can we turn to POL00381077,

5 and could we start by looking at the bottom email on

6 that page, please.

7 So the Head of Public Relations has emailed about

8 BBC News. So this is on the day of Second Sight's

9 publication:

10 "Just to let you know that BBC News has carried

11 a news in brief piece with accompanying branch footage

12 which lasted about 20 seconds.

13 "Ran along the lines of 'Around 100 [subpostmasters]

14 are embroiled in a bitter dispute with the Post Office

15 over a computer system they claim is losing them money

16 every year'. Not ideal but probably the next best thing

17 to nothing appearing at all. We'll circulate the clip

18 once we receive it.

19 "Nothing on BBC Online yet. Expecting two

20 human-interest style regional TV pieces from BBC Look

21 North and BBC Look South."

22 You respond to say, "Hi" -- this is to Mark Davies:

23 "... assume you've seen completely erroneous

24 headline on BBC website and are on to them?"

25 Can you recall what the headline was at all?

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1 confidence in possibly an unfair way.

2 **Q.** If we scroll up, Mark Davies says:

3 "Hugely yes."

4 Your response is:

5 "Thought you would be. Arseholes."

6 Who are the "arseholes"?

7 **A.** I'm referring to the BBC coverage there.

8 **Q.** Was it part of your job to seek to control the narrative

9 of the press?

10 **A.** No. I mean, not specifically. That was Mark's job.

11 I think there are very limited numbers of occasions

12 where I would comment on this, but this came to my

13 attention -- as I describe, the reaction I had at the

14 time is it felt like it was a -- wasn't entirely

15 appropriate for the BBC to be reporting on allegations

16 against Horizon. It felt like it had misrepresented it

17 and turned it into a different story, which had far

18 greater ongoing implications for the safety of Horizon.

19 So I was reacting emotionally to that and issuing

20 what was probably a bit of an uncharacteristic email for

21 me.

22 **Q.** But, again, we saw that brief to the Board in which you

23 describe some sort of corporate mindset. Is this

24 another display of that corporate mindset at the time,

25 an "us versus them" attitude?

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1 **A.** I think it was long the lines of what Nina Arnott quotes

2 in her email.

3 **Q.** If we scroll down, let's have a look at that. What's

4 wrong with that?

5 **A.** I think the specific bit I was reacting to was the end

6 of that statement, that it's the computer system is

7 losing them money every year. So I think the bit which

8 felt to me at the time a misrepresentation of the

9 position, misrepresentation of the allegations being

10 made against Horizon, was it had been changed from

11 a historical issue to there was ongoing problems with

12 the computer system and that's losing postmasters money

13 every year.

14 Now, in hindsight, we may -- we might give more

15 credence to that but, at the time, that felt a very

16 different representation to the allegations we were

17 dealing with.

18 **Q.** But all it's saying is 100 people are claiming that it

19 is losing them money every year; it's not presenting it

20 as fact, is it?

21 **A.** No, but I think I was very conscious of -- we're all

22 very conscious of what impact headlines could have on

23 postmaster confidence, public confidence, client

24 confidence, in the computer system, and I think we all

25 knew it was quite easy for headlines to undermine

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1 **A.** The mindset I was referring to earlier was there was

2 absolutely a mindset that -- clearly a strong conviction

3 at the time of the integrity of Horizon. That was the

4 mindset I was referring to. I don't think at the time

5 I would particularly have recognised a them versus us

6 mindset. I don't think -- I wouldn't describe that

7 email as part of that. As I say, I was reacting to

8 a specific aspect of that headline.

9 **Q.** It's quite a strong reaction to have to something that

10 simply states an allegation from subpostmasters, isn't

11 it?

12 **A.** It is a strong -- our reaction, it's clearly one of

13 those emails you regret. I think it was an over-the-top

14 reaction.

15 **Q.** But does it display something wider than just your own

16 personal reaction, a corporate reaction to a BBC report?

17 **A.** As I say, I don't think it does at the time. And

18 maybe -- maybe this is unfounded but at the time there

19 was a lot of concern around what the -- would

20 allegations and headlines about Horizon undermine wider

21 public confidence in the system? At the time, the

22 financial crisis was still recent memory. We all know

23 media headlines provoked and undermined public

24 confidence in systems back then. So that type of

25 experience was front of mind, and we were concerned

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1 about what impact media statements could have on the
2 wider market position of Post Office.

3 In hindsight, I agree, it was an overreaction, but
4 I think it was -- I think what it represents was anxiety
5 around what statements about Horizon could have for
6 wider client and customer confidence and postmaster
7 confidence in Horizon.

8 **Q.** Just customer confidence or potential flotation business
9 interests?

10 **A.** I didn't -- I wasn't -- that wasn't drawing anything
11 whatsoever to the Royal Mail flotation. That absolutely
12 wasn't in my mind at the time.

13 **Q.** In terms of timing, that was 8 July. 15 July was the
14 date, we know, of the Simon Clarke Advice. You also
15 mentioned in your briefing to the Board about Susan
16 Crichton meeting with lawyers. She's given us evidence
17 on that. She said that there was a meeting on 3 July.
18 There was also a meeting on 10 July addressing the
19 Gareth Jenkins issue?

20 At this stage, were you aware of the Gareth Jenkins
21 issue?

22 **A.** No, I wasn't.

23 **Q.** Could we please look at the final document before the
24 lunch break. POL00297915. Page 3, please. If we
25 scroll down, sorry, page 3, over the page, please. The

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1 with that view.

2 **Q.** It isn't every day that the Criminal Cases Review
3 Commission writes to the CEO of a company. What kinds
4 of discussions did you have with Paula Vennells about
5 the CCRC's interest at that time?

6 **A.** I don't recall any conversations with Paula on this.

7 **Q.** None at all?

8 **A.** No. No.

9 **Q.** Would you have discussed with her who should send the
10 letter?

11 **A.** As I say, I was aware, I think she had already -- what
12 I'd already seen was she had -- if recall correctly, she
13 had forwarded on the original letter to Susan and asked
14 her to respond. So I kind of was conscious she'd
15 already given that steer.

16 **Q.** Were you aware of Mr Clarke's advice or concerns about
17 the use of Gareth Jenkins at that time?

18 **A.** No, I wasn't.

19 **Q.** You were aware that Susan Crichton was liaising with
20 external lawyers during that period, and the brief to
21 the Board said something along the lines of, "We can
22 provide a further update on this work next week".

23 That was 5 July. What investigations or enquiries
24 did you make into the discussions that Susan Crichton
25 was having?

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1 bottom email of page 3, thank you. A solicitor Rosie
2 Gaisford, from Bond Dickinson, has emailed you and she
3 says as follows:

4 "A later from the CCRC dated 12 July 2013 addressed
5 to Paula Vennells is attached above. We have drafted
6 a holding response to the CCRC's letter, to be sent
7 auditor tomorrow morning ... The holding response is
8 currently in Paula's name. Are you happy for this to be
9 sent out in Paula's name or would you rather it was sent
10 out in your name, Susan Crichton's name, or the name of
11 another individual?

12 "A substantive response has also been drafted to the
13 CCRC's letter. Once this substantive response has been
14 discussed with Brian Altman QC, a leading criminal
15 barrister and former First Treasury Counsel, it will be
16 sent out, by the end of the week."

17 If we look above, it's a response from you, and you
18 say:

19 "Thanks Rosie -- I think both this and the
20 substantive response should come from Susan."

21 Did you discuss this with Paula Vennells?

22 **A.** I mean, I think, at the time, Paula had already given
23 a steer to Susan that it should come from her, so I was
24 conscious of that. As you see in the next sentence,
25 I asked Susan if -- give her the opportunity to disagree

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1 **A.** I think the next step in the chronology -- and we might
2 come on to this -- if I recall correctly, there was then
3 a broader Board update note prepared, I think, on
4 26 July, which included updates on all of the
5 workstreams relate to this matter, including where Susan
6 had got to with the external lawyers. So I think that
7 was the next step, and that was based on input from
8 Susan and a number of others.

9 **Q.** Did that refer to, for example, Mr Jenkins --

10 **A.** No, it didn't.

11 **Q.** -- and who drafted that brief?

12 **A.** So, it's in another document which I coordinated.
13 I held the pen on it but it was based on input from
14 Susan on the legal side, Alwen -- I think the network
15 side on the branch improvement workstream. It was based
16 on input from number of different workstream leads
17 across the business.

18 **MR BLAKE:** Thank you.

19 Sir, that may be an appropriate moment to take our
20 lunch break.

21 **SIR WYN WILLIAMS:** Yes.

22 **MR BLAKE:** Can we come back at 1.50, please?

23 **SIR WYN WILLIAMS:** Yes, certainly.

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

25 (1.00 pm)

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(The Short Adjournment)

1
2 **(1.50 pm)**
3 **MR BLAKE:** Good afternoon, sir, can you see and hear me?
4 **SIR WYN WILLIAMS:** Yes, thank you.
5 **MR BLAKE:** Thank you very much.
6 Mr Edwards, before the break you mentioned the Board
7 briefing of 26 July. I'm just going to bring that up on
8 to screen, so you can confirm this is the document you
9 were talking about. It's POL00006590.
10 Is this the document you were referring to?
11 **A.** Yes, it is.
12 **Q.** Were you involved in the drafting of this document?
13 **A.** I was, yes. I kind of coordinated the preparation of
14 this.
15 **Q.** Is it at this point in time where there seems to be
16 a movement towards restricting the involvement of Second
17 Sight or limiting their involvement going forwards?
18 **A.** I think the discussion around Second Sight's ongoing
19 role had probably been iterating for a number of weeks
20 leading up to this and beyond it, so I'm not sure it
21 was -- particularly the development of this report,
22 I think it was about this time.
23 **Q.** That individuals' thoughts are gathering as to the
24 future for Second Sight and limiting their input?
25 **A.** The question I recall at the time was: there was clearly
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1 is very problematic -- it highlights all the risks which
2 NFSP and others claim, and therefore supports the
3 campaign. I don't suggest such risks should not be
4 discussed but it does so [badly] without mitigation and
5 is poorly drafted in places -- specifically on Horizon."
6 Then if we scroll up Mr Gibson has responded.
7 You're copied in on correspondence, he says:
8 "Hi Mark, I share your concerns and we've gone to
9 [Royal Mail] on them. I sent the comments we sent over
10 to Susan so feel free to have a look.
11 "The [Royal Mail] suggestion it's our document is
12 nonsense -- Slaughters are holding the pen and [Royal
13 Mail] directors are responsible for it. That said, we
14 can certainly influence its drafting as I'd be keen to
15 ensure in this case."
16 So the complaint there from Mr Davies, if we scroll
17 down, is about the risk section. We can then see what
18 happens to that risk section. Can we please turn to
19 POL00381531. There is an email from Mark Davies on the
20 second page, to Paula Vennells, and she has inserted
21 some words in capitals. So if we scroll up slightly we
22 can see her response -- a little bit more, thank you.
23 She's responded to Mr Davies, and said:
24 "Mark, thank you this is very helpful. I have made
25 some comments below in caps (nb, if someone can show me
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1 a cohort of cases which had been submitted as part of
2 the first phase of the Second Sight investigation.
3 I think it was about 47, and I think the debate is do
4 they -- just focused on them, is their role beyond that?
5 Those were the types of questions being raised.
6 **Q.** I think in your document pack, there's a reference to
7 just keeping it at 47; do you recall that?
8 **A.** Yes, I recall that being a suggestion from some of the
9 business.
10 **Q.** Thank you, that can come down, I'm going to move to
11 a different topic and that is the flotation prospectus
12 and I think you said you weren't involved in the
13 flotation of Royal Mail itself?
14 **A.** Not itself but, as I'm sure we'll come on to, I was
15 involved at one point in providing some comments on
16 specific references to the Post Office in the
17 prospectus.
18 **Q.** Can we please turn to UKGI00001916. If we look at the
19 second email on the page it's an email from Mr Davies to
20 Will Gibson at ShEx and he says:
21 "Just wanted to touch base on prospectus which
22 I know you have talked to Susan about. [Royal Mail]
23 described it to me as a BIS document [that's
24 a Department for Business document] but I think you
25 don't share view? Anyway the unvarnished risk section
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1 how to change the colour -- that would be far more
2 effective ..."
3 If we scroll down, we can see Mr Davies' email to
4 Paula Vennells and also her response, and it's the
5 bottom of that page that I'd just like to take you to.
6 He says:
7 "RMG prospectus: We are working with legal on this.
8 The section on risk is very problematic for [the Post
9 Office]. The PR team are across it and I have asked
10 Mike to also work on it from his perspective."
11 Then that's the response from Paula Vennells in
12 capitals "AM AWARE [THANKS]".
13 What was the purpose of the prospectus?
14 **A.** So it was clearly Royal Mail's documents to inform
15 prospective buyers for their shares.
16 **Q.** Thank you. Can we please turn to POL00299534. If we
17 could start on the second page, please. So this is your
18 involvement, if we look at the bottom of page 2,
19 an email from Tim McInnes from ShEx. He says:
20 "Martin ..."
21 That's a reference to you:
22 "Can you let me know the time/status of [Post
23 Office's] most recent conversations with [Royal Mail] on
24 the prospectus. We think someone on the other side
25 might be saying that [the Post Office] has signed off,
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1 and to bat this away (which we will) it will be useful
2 to understand comms channels and what has been
3 said/agreed.

4 "And further to our chat a few minutes ago it would
5 be good if you can leave this with us for the moment.
6 We will keep you updated on progress in real time but
7 there are some weapons we want to keep in the arsenal
8 and only use if they are absolutely necessary. We have
9 a couple of avenues to try still so let's see where we
10 get to with those."

11 Why is Tim McInnes contacting you specifically?

12 **A.** Part of my role as Chief of Staff, and I think I have
13 referred to this in my witness statement, was to be part
14 of an informal line of communication into the ShEx and
15 BIS teams, so they were in contact with lots of people
16 in the Post Office but, if they weren't sure where to
17 go, they could pick up the phone to me and I could help
18 them out and direct them to the right place. So that
19 was part of my role.

20 **Q.** Were there others assigned to that role or was that
21 a role you specifically held?

22 **A.** I'd say the Comms Team had primary accountability for
23 Government relations. I think my role was particularly
24 to help -- an additional line of communication into the
25 BIS and ShEx teams.

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1 Office and Royal Mail, raising the possibility that
2 relationship could break and raising risks about our
3 operational dependability.

4 And I think our concern was, whilst we recognised
5 prospectus, by definition, needs to be clear to
6 investors about prospective risks, we were concerned
7 that without the right context, that would kind of play
8 into some of these anxieties of the network about what
9 impact separation would have.

10 **Q.** But, of course, a risk section in a prospectus has to be
11 absolutely accurate about the risks that the company
12 faces?

13 **A.** Yes, yeah and obviously what we're trying to finding the
14 right balance here, is factual description of risk but
15 making sure they're understood in the right context.

16 **Q.** Thank you. Can we turn to the first page, please. At
17 the bottom of the first page, you email Susan Crichton
18 and Hugh Flemington:

19 "... would you be able to ask Slaughters to send
20 across the latest extracts on [Post Office] from the
21 prospectus please? Just spoke to Will G for an update
22 from their perspective -- he said the main sticking
23 point was the sentence on Horizon/Second Sight in the IT
24 risks section, which they're still pushing to have
25 removed but are facing some resistance.

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1 **Q.** Because it's not just communications that you need that
2 relationship with ShEx; it's also because they have
3 a seat on the Board, and there is a direct line of
4 accountability of some sort, isn't there?

5 **A.** Yes, yeah. It clearly had interests across the full
6 span of the business.

7 **Q.** If we scroll up, the response from yourself:

8 "Tim -- the only other channel of communication with
9 [Royal Mail] on the prospectus has been between our
10 Legal Team (Susan and Hugh, who I have copied) and
11 a lawyer at Slaughters. Hugh can confirm, but as far as
12 I'm aware the last communication with them was 1-2 weeks
13 ago, and focused on narrower points of legal/factual
14 detail rather than the reputational/PR issues that
15 I flagged to you".

16 What were those issues that you had flagged?

17 **A.** I think the context for this, there was a huge amount of
18 anxiety at the time about the separation of Royal Mail
19 and Post Office: a lot of anxiety from the network, from
20 the NFSP, from the CWU about what repercussions this
21 would have for the long-term relationship between Post
22 Office and the Royal Mail. And so I think the
23 particular concerns were, as you'd expect in a risk
24 statement, there were lots of quite extensive
25 description of risk about the relationship between Post

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1 "I asked if that meant the other issues had been
2 resolved (on MDA language etc) ..."

3 What was MDA?

4 **A.** MDA that was the Master Distribution Agreement, so that
5 was the long-term agreement between Post Office and
6 Royal Mail so that governed our ongoing relationship
7 post-separation.

8 **Q.** "... he said he didn't think there was any pushback
9 there but wasn't able to confirm whether our comments
10 had been taken on board. He said he would do some
11 digging -- but it might just be quicker to get hold of
12 the latest language direct from Slaughters."

13 So at this point there was issues principally with
14 the prospectus. One of them, relating to Horizon/Second
15 Sight, and the other was on the MDA language, is at
16 right?

17 **A.** Yes, the MDA language, that broader ongoing relationship
18 between Post Office and Royal Mail.

19 **Q.** The response from Susan Crichton:

20 "We cannot go direct to Slaughters they would have
21 to ask RMG to approve giving us the information, so
22 I will ask [Royal Mail] but as I understand it the
23 Horizon/IT reference was taken directly from our press
24 release."

25 You say:

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1 "Thanks Susan. Looks like none of our changes have
2 been taken on board ..."

3 Susan Crichton responds:

4 "So are you going back to BIS -- not sure our
5 protesting about this will make any difference?"

6 You say:

7 "Yes, I will pick up with BIS and keep you posted."

8 Could we please turn to UKGI00002065. If we scroll
9 down slightly, an email from Mr McInnes to Mr Gibson at
10 ShEx and also to yourself. He says:

11 "Will, Martin,

12 "See below an extract from an email just received
13 from Freshfields related to the Horizon disclosure.

14 "Martin, I want to wait for the fat lady to sing,
15 but it looks like you managed to make more progress (or
16 rather progress) than we could at this end. Many thanks
17 for taking the baton."

18 The extract from the email is:

19 "The Horizon language is still in the draft, but
20 I spoke to Alex Dunn just now and he says that all of
21 the Horizon disclosure will be taken out today -- which
22 is good news."

23 If we scroll up, we can see your response:

24 "Thanks, Tim, that's very good to hear. We
25 intervened with Jon M last night ..."

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1 wide problems had been founding in relation to the
2 'Horizon' software, but suggests that [Post Office]
3 should examine its support and training processes for
4 subpostmasters."

5 That was accurate, as a statement, wasn't it?

6 **A.** Yes, I think the statement itself was accurate and, as
7 we saw in the earlier exchanges, I think it had been
8 lifted from a Post Office press notice.

9 **Q.** Ms Vennells says below:

10 "Our challenge is that this is not a risk to [Royal
11 Mail] and is particularly misleading in the IT risks
12 section. As your paragraph states, the findings of the
13 Interim Report related to [subpostmaster] training and
14 support not IT faults."

15 Do you agree with that final distinction?

16 **A.** I mean, yes, it's -- we didn't see this as a risk to
17 Royal Mail at that point and, as was described in the
18 email, the key finding from the Second Sight Interim
19 Report was around postmaster training and support. We
20 didn't, at that point, see it as an IT system; it was
21 the broader process of support and training. So yes, it
22 felt like a -- that was the right summing-up in Paula's
23 email.

24 **Q.** So in your view, the Second Sight report was not
25 addressing IT issues; it was relating simply to the

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1 Is that Jon Millidge?

2 **A.** Yes, I believe so.

3 **Q.** He was the Company Secretary of Royal Mail?

4 **A.** Yes.

5 **Q.** "... last night and he said he would pick this up with
6 the team."

7 Now, we can see how that occurred, and I'm going to
8 take you to correspondence between Paula Vennells and
9 Mr Millidge that is referred to there. Could we please
10 turn to POL00146462, and can we start at the bottom of
11 page 2, please. Thank you.

12 So this is a Friday night email from Ms Vennells to
13 Mr Millidge, and she says:

14 "Hi Jon, I realise this is ridiculously late and for
15 that my sincere apologies. However, I have just seen
16 an email that our team in BIS appear to have hit a brick
17 wall on one particular para in the prospectus. And I'm
18 told it has to be lodged with UKLA by 8.00 am on
19 Monday."

20 This is the passage that has been objected to from
21 the prospectus:

22 "In July 2013, an Interim Report was published into
23 alleged problems with [Post Office's] 'Horizon' computer
24 system, which is used to record transactions in its
25 branch network. The report confirmed that no system

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1 subpostmaster training and support?

2 **A.** No, it clearly addressed both but the major finding,
3 major focus was particularly around training and
4 support.

5 **Q.** Was that training and support generally or training and
6 support in relation to the Horizon system?

7 **A.** In relation to use of the Horizon system, yes.

8 **Q.** Therefore, is it inappropriate for that to have been
9 included in a section under IT?

10 **A.** I think it was felt to be inappropriate in a section on
11 Royal Mail IT risks. That felt like kind of
12 an inappropriate place to be talking about this risk.

13 **Q.** We can read here the feeling that it's inappropriate, as
14 expressed by Ms Vennells, but what is your personal
15 view? Is there an issue with what was in a press line
16 relating to the Second Sight Report, which was
17 an investigation into the Horizon IT System, being in
18 a section in a prospectus under the IT section?

19 **A.** I think I -- I mean, I think I would agree with the
20 assessment that repeating language about the findings of
21 the Second Sight Reports in a section on Royal Mail IT
22 risks doesn't accurately describe the nature of that
23 risk. So it does feel to me like a fair concern.

24 **Q.** Was it a risk, the matters that were identified by
25 Second Sight were they a risk more broadly to the Royal

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1 Mail?

2 **A.** Not as we understood them to be at the time, no.

3 **Q.** So they are not risks that would have affected the Royal

4 Mail Group?

5 **A.** We didn't perceive them to be. I think clearly the

6 chief concern at this stage was reputational risks for

7 Post Office.

8 **Q.** It says:

9 "Can you get this paragraph removed? Alice had

10 offered to contact Donald if necessary but I don't want

11 to disturb her this weekend.

12 "So sorry to bother you with this. And I recognise

13 that the para makes it clear that there isn't an IT

14 fault. But its presence in an IT risk section

15 potentially opens up a sensitive and politically high

16 profile situation."

17 How would the inclusion of a line that is your own

18 press line potentially open up a sensitive and

19 politically high-profile situation?

20 **A.** I think our feeling was we'd obviously -- the Second

21 Sight Report had been published. We had published our

22 response to that Second Sight Report. All of that had

23 been disclosed, re-airing that particular information in

24 the context of a Royal Mail prospectus and a section

25 talking about Royal Mail IT risks. Clearly the concern

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1 "This is not a [Royal Mail] contract risk either."

2 Then if we control up above he says:

3 "Okay. I think we should be able to remove but I

4 will need to confirm on Monday."

5 Then if we look at the top email, Paula Vennells to

6 Alice Perkins:

7 "Not sure how much you want keeping in the loop.

8 But hoping it goes through, I have earned my keep on

9 this one. Unusually BIS misjudged it: they were unable

10 get the changes through and seemed to be unclear(?) on

11 how much time we had before the deadline. So we were

12 told our luck and time that run out of Friday."

13 "Read bottom up. I hope it is now resolved."

14 This seems to suggest quite a lot of micromanaging

15 of information relating to the Second Sight Report;

16 would you agree with that?

17 **A.** I think I'd agree it reflects a high degree of anxiety

18 of that information being recirculated, in what we felt

19 to be out of context and clearly an extraordinary

20 high-profile context. So yes, I think it reflects

21 a high degree of anxiety about that.

22 **Q.** We saw before lunch your comment on the BBC article and

23 their report on the Interim Report.

24 Similar approach here, trying to clamp down on

25 references to the Second Sight Report and their

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1 was that, yes, it was raising attention to that issue

2 and, again, in the wrong context and that was causing us

3 some anxiety.

4 **Q.** If we scroll up on page 2, we can see Mr Millidge's

5 response:

6 "I thought that this risk only repeated the press

7 release and that your team were ok with it.

8 "Evidently not! So let me check with the team.

9 I will get back to you."

10 If we scroll up, Ms Vennells says:

11 "It is. Just odd therefore that it features in

12 an IT risk section."

13 If we continue scrolling up, please. The response

14 from Mr Millidge, if we scroll up to the bottom of the

15 next page -- oh, yes, its just there, at the bottom of

16 this page:

17 "And that is the point I have just raised with the

18 team -- maybe better under contracts."

19 So Mr Millidge is saying, "Okay, I get the point

20 about it not going under IT, it should maybe be better

21 under the contract section".

22 Is that what you understand his email to suggest?

23 **A.** Yes, yes.

24 **Q.** Then Ms Vennells says:

25 "No Jon, the request is to remove it.

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1 findings; would you agree with that?

2 **A.** I'm not sure I'd quite agree with that characterisation.

3 As we discussed before lunch, the concern about that

4 report wasn't referenced to the Second Sight Report; it

5 was the way it had been described to be an ongoing

6 problem of Horizon. That was the specific concern here.

7 We had published the Second Sight Report, we had

8 published our response to it. So I don't think it was

9 an issue *per se* with that being in the public domain.

10 I think it was an anxiety about how that information

11 might be represented in the wrong context.

12 **Q.** Can we please look at POL00299535, this is an email from

13 yourself, 25th September. You're emailing Mark Davies

14 and others. You say:

15 "Mark, Ruth and team.

16 "Here is the latest (and I understand final) draft

17 of the [Post Office] extracts from the [Royal Mail]

18 prospectus. It's certainly much better than it was, and

19 we managed to get the sentences on the Second Sight

20 review deleted. But the risks section is still,

21 inevitably, negative in tone -- whilst the standard

22 audience for such documents (ie investors) would expect

23 this and not take it out of context, clearly journalists

24 and unions may seek to misuse it. So I guess over to

25 you guys to work with BIS and [Royal Mail] comms on the

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1 defensive lines! Let me know if there is anything to do
2 to help. I've asked BIS to see if they can get hold of
3 the wider marketing materials for the IPO, which will
4 hopefully include some more positive statements on the
5 [Post Office-Royal Mail] relationship -- but probably
6 worth asking your counterparts in [Royal Mail] too as
7 they may be a quicker route."

8 So significant efforts have been put into getting
9 the Second Sight review deleted from that report?

10 **A.** Yes.

11 **Q.** Do you consider the actions that took place in relation
12 to that prospectus to have been appropriate?

13 **A.** I think they do clearly reflect a very high degree of
14 anxiety around the positioning of the Second Sight
15 Report and how that was reflected, but -- and as we see
16 in this email, they also reflect broader anxiety about
17 the whole separation process, which -- I mean, this was
18 one of the most seismic events to impact the Post Office
19 in its history, so the whole process of Post Office
20 separation and privatisation was intensely sensitive to
21 the business.

22 **Q.** It's editing a section on risks to investors. Surely it
23 has been shown to be quite right that it is and was
24 a very significant risk to investors; do you agree with
25 that?

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1 **A.** Correct, yes.

2 **SIR WYN WILLIAMS:** Okay. So from your personal perspective,
3 at the time, were you looking at this as a risk to Post
4 Office alone or were you thinking that there may be
5 wider implications with there being a risk to Royal
6 Mail?

7 **A.** I think I and everyone working on this was very much
8 focused on the risk to Post Office. I really don't
9 think the -- the driver for this wasn't concerns around
10 Royal Mail, *per se*. We were very much looking to
11 protect Post Office's reputation on the range of issues
12 raised by separation.

13 **SIR WYN WILLIAMS:** So that I'm not -- because I don't claim
14 to have any expertise in what happens when companies
15 separate but the actual separation had taken place
16 a year before, had it not?

17 **A.** In terms of corporate separation, I'm not quite sure
18 when, corporately, the two companies separated. I think
19 you may be right and then, obviously operationally, it
20 was an ongoing process.

21 **SIR WYN WILLIAMS:** Yes. I think I'm right in saying that
22 the act which enabled the separation --

23 **A.** Yes.

24 **SIR WYN WILLIAMS:** -- was January 2012 and the actual
25 separation was April 2012?

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1 **A.** I'm not sure, to be honest, whether, even in hindsight,
2 this whole affair has represented a risk to Royal Mail,
3 *per se*. I'm not sure. I don't feel well placed to
4 qualify that. That wasn't my understanding.

5 **Q.** In relation to the Post Office, though, it's been
6 a significant risk; would you agree with that?

7 **A.** Yes, it's been a monumental risk to the Post Office,
8 yes.

9 **SIR WYN WILLIAMS:** Just so I can understand this,
10 Mr Edwards, in the emails we've been going through,
11 especially from Ms Vennells, as I read them at least,
12 she was making it clear that the risk was to the Post
13 Office; it was a Post Office risk, not a Royal Mail
14 risk, and that was at least one of the reasons which was
15 motivating her to ask that the risk be removed. Have
16 I got that right?

17 **A.** Yes, I think that's absolutely correct, sir. Yes. That
18 was the key concern. We understood it to be a risk to
19 the Post Office. It wasn't necessarily a risk to Royal
20 Mail, which is why it felt inappropriate to be in
21 a Royal Mail prospectus.

22 **SIR WYN WILLIAMS:** That debate about whether it should be
23 under IT risks or contract risks, the point is made
24 explicitly, "It's not a risk to you", in effect, "it's
25 a risk to us".

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1 **A.** Yes, I think you're correct.

2 **SIR WYN WILLIAMS:** So this is a process, in effect, to sell
3 shares in Royal Mail?

4 **A.** Correct, yes.

5 **SIR WYN WILLIAMS:** Right. Okay, thank you.

6 **MR BLAKE:** I'm going to go back slightly in time to
7 POL00112856, to 9 September. This is the insurance
8 notification that the Inquiry has seen. If we scroll
9 over the page, we can see that it was communicated via
10 a note on Bond Dickinson headed paper and, if we scroll
11 down, and over the page, to page 3, we can see the
12 section there on risk to the Post Office, and we have
13 dealt with other witnesses on how this came to be
14 formulated.

15 Were you involved in this at all?

16 **A.** No.

17 **Q.** Were you aware of concerns about the provision of
18 information to the Post Office's insurers around this
19 time?

20 **A.** I was aware that the -- I think at the July Board,
21 questions had been raised by some of the board of
22 directors about the insurance position. I think that's
23 referenced in the 26th July paper which we looked at
24 earlier. So I was aware of it to that extent and,
25 obviously, was aware of what was covered in that paper.

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1 I wasn't close to what happened to that discussion after
2 the 26th July.
3 **Q.** You say in relation to the prospectus that you were
4 aware of a general concern around insensitivity to the
5 overall issues in the business. Were you aware of those
6 concerns and sensitivities when it came to the type of
7 information that was provided to Post Office's insurers?
8 **A.** No, I really wasn't close to that process at all. It
9 was being led by, I think, our CFO at the time.
10 **Q.** Thank you. Can we please turn to POL00382001, and the
11 bottom of the page, please.

12 This is the email that the Inquiry has seen several
13 times, it's at the bottom of the page from Paula
14 Vennells to Alice Perkins:

15 "Hi Alice, don't worry about the lateness of this
16 not -- I'm clearing the tray before signing out."

17 Then it's the bottom of this page, it says:

18 "My concern re Sparrow currently is our obligations
19 of disclosure regarding an unsafe witness (the
20 representative from Fujitsu made statements about no
21 bugs, which later could be seen to have been undermined
22 by the [Second Sight] report.) we do not think it
23 material but it could be high profile. Martin E is
24 briefed if you want more detail."

25 Who had you been briefed by?

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1 aware, this is a period where Susan Crichton was in the
2 process of leaving the business. As I recall, Paula
3 brought me into the loop. She wanted to let Alice know
4 but she also wanted to give Alice a point of contact
5 that she could reach to whilst Paula was away and, for
6 obvious reasons, Susan probably wasn't the appropriate
7 point of contact, so she brought me into other loop so
8 Alice could reach at to me if she wanted further
9 information.

10 **Q.** So your briefing there was only from Paula Vennells?

11 **A.** I can't recall being briefed on this directly by the
12 Legal Team. I can't recall anything verbally.
13 I haven't seen anything in the documentation.

14 **Q.** Had you seen the review by Brian Altman?

15 **A.** No. I'd seen it being referred to and brief bits of it
16 summarised but no, I hadn't seen the review itself.

17 **Q.** Summarised by who?

18 **A.** I think Rodric Williams. It may have been -- it was
19 around this time, particularly as part of the drafting
20 of the CO's report, Rodric sent me some contributions to
21 that and included brief summaries of what Brian Altman
22 was concluding.

23 **Q.** So Mr Altman's review is dated 15 October. Perhaps we
24 can very briefly go to that, that's POL00006803. If we
25 turn to page 18. If we scroll down, he addresses the

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1 **A.** As far as I recollect, it was by Paula herself.

2 **Q.** And what did she say?

3 **A.** So my recollection is hazy. It was a verbal
4 conversation. I think she'd been updated by the Legal
5 Team. I assume Susan, but I can only remember broad --
6 similar details to what she gave us in this email, that
7 there was a concern that a Fujitsu witness hadn't
8 disclosed the bugs which became apparent, which were
9 disclosed in the Second Sight Report, that would most
10 likely need to be disclosed to previous prosecutions.
11 As I understood it, that had been put into the
12 Cartwright King review process.

13 My recollection, the general impression I got from
14 that conversation kind of accords with what we've got
15 here, which -- it was sensitive, it clearly wasn't
16 helpful, but it wasn't viewed to be material to the
17 outcome of those prosecutions. That was the general --
18 that's the best of my recollection.

19 **Q.** So "we do not think the material", is that yourself and
20 Ms Vennells?

21 **A.** No, certainly not my opinion. I think my impression, my
22 recollection, is that that was the opinion that Paula
23 had formed, having discussed this with the Legal Team.
24 And just for -- I mean, I think the reason I was brought
25 into the loop at this point, as the Inquiry is probably

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1 issue of Gareth Jenkins. He then addresses the issue
2 over the page of the Helen Rose Report. He says at
3 paragraph 50:

4 "The draft report is based on an exchange ...
5 between Gareth Jenkins and Helen Rose ..."

6 If we perhaps move on to page 44, Mr Altman had
7 addressed Gareth Jenkins and the impact on possible
8 appeals. Perhaps we could turn to paragraph 142, he
9 said:

10 "Of grave concern is that Mr Jenkins informed the
11 [Second Sight] inquiry of the two defects, which they
12 reported at section 6 of the report, suggesting that he
13 knew of them in a period Mr Clarke argues in his 15 July
14 2013 Advice to be between 5 October 2012 and 3 April
15 2013, which are the dates of essentially five Jenkins
16 witness statements Mr Clarke sampled. Yet in none of
17 them is there to be found any reference to these two
18 system defects. On the contrary, his reports speak to
19 the general integrity of the system."

20 Had this kind of information been brought to your
21 attention?

22 **A.** No. Not -- no, not in this level of detail or candour.

23 The only bit which resonates is some of the -- which
24 resonates from the conversation I had with Paula was
25 around the number of past cases which might be impacted.

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1 So the figure of five sounds familiar but none of this
 2 detail I'd seen before.

3 **Q.** So you think around this time you were aware that around
 4 five cases had been impacted by, what, the provision of
 5 evidence by Mr Jenkins?

6 **A.** What I recall, in Paula's description of what impacts
 7 the Gareth Jenkins issue might have, I recognise
 8 a figure of five being described here as one of the
 9 reasons why she or the Legal team didn't view this to be
 10 highly material.

11 **Q.** Because of the small number of people that it directly
 12 involved?

13 **A.** I think the combination of the small number of people
 14 and, I guess, a question -- the impression I was given
 15 is that it was clearly deeply unhelpful and deeply
 16 inappropriate but didn't necessarily add to the
 17 disclosure of the two bugs themselves, which had been
 18 disclosed to past prosecutions with the Second Sight
 19 Report. It wasn't conveyed to me that it added very
 20 much to that.

21 **Q.** Conveyed to you by who?

22 **A.** As I say, I'm basing this on the briefing -- the verbal
 23 briefing I was given by Paula.

24 **Q.** So Paula Vennells had sent an email to Alice Perkins,
 25 she was about to go away, you were the person who had

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1 Could we please turn to POL00407608. Now, this is
 2 going slightly back in time and nearly two months before
 3 that email from Paula Vennells to Alice Perkins. If we
 4 scroll down to the bottom, we can see an email from
 5 Susan Crichton, and she says:

6 "Paula
 7 "Further to our conversation this afternoon."
 8 This is 3 September:
 9 "There are two issues that we need to obtain JA's
 10 view on our approach."
 11 That must be James Arbuthnot.
 12 If we keep on scrolling, there's a section in that
 13 email entitled "Legal and Adjudication of future case",
 14 and it's the bullet points below that that I would like
 15 to draw to your attention.
 16 "Meeting was held with our external law firm who
 17 have been completing the criminal case review.
 18 "The issues that we want Brian Altman QC to advise
 19 on were agreed, final sign off of review process;
 20 options re appointment of independent expert witness
 21 (paper to follow); advice on prosecutions going forward.
 22 "Following this discussion [terms of reference] for
 23 his review to be finalised."
 24 It's the reference there to the appointment of
 25 an independent expert witness.

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1 been briefed on the issue. Do you think that you were
 2 sufficiently briefed?

3 **A.** No, and I think, in practice, what she was expecting me
 4 to do -- she wanted me to give Alice the name of someone
 5 she could contact in her absence. Susan Crichton,
 6 I think, if she hadn't formally left the business was
 7 effectively left. I think, from memory, Chris Aujard
 8 had only just started, so it wasn't really appropriate
 9 to give his name. I don't think Alice would have known
 10 the names of the people who sat below Susan, so she was
 11 giving Alice my name to reaching out to and I would then
 12 liaise with the likes of Rodric Williams if further
 13 information was needed.

14 **Q.** If we scroll down, we can see further sections
 15 addressing the Gareth Jenkins issue, and something we're
 16 going to come to in a moment, if we turn to page 54,
 17 paragraph 173, Mr Altman has said:

18 "The Helen Rose Report adds very little, it seems to
 19 me, other than to point to a particular issue at Lepton,
 20 and the implications from the report that as early as
 21 February 2013 Gareth Jenkins was aware of integrity
 22 issues with Horizon, none of which he revealed. The
 23 [Second Sight] report and the Rose Report are the limit
 24 of the current disclosure recovered. I am unaware of
 25 anyone being provided with anything more than this."

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1 Were you aware at that time, September 2013, that
 2 there was an issue with the expert witness?

3 **A.** I'm not sure I was. The clearest first recollection
 4 I've got of this was in October, in relation to the
 5 exchange we've been just discussing. I don't recall
 6 picking up on this point or particularly understanding
 7 it. I certainly don't think I'd linked this to what
 8 I now understand to be the Gareth Jenkins issue.

9 **Q.** Because, if we scroll up, we can see that Paula Vennells
 10 has sent this email to you. If we scroll up slightly,
 11 can you see there?

12 But that's not something that sunk in at all about
 13 a concern regarding an expert witness, or the
 14 appointment of a new expert witness?

15 **A.** It's not something which I -- no, I certainly didn't
 16 pick up on that. I think the main reason I was being
 17 copied in -- at that point I think I was supporting on
 18 some of the preparations for the appointment of the
 19 chair of the Working Group, obviously, what ultimately
 20 became Sir Anthony Hooper. So I think that's why Paula
 21 Vennells added me to the copy list.
 22 I certainly don't recall reading this email and
 23 picking up on that specific bullet point.

24 **Q.** But by the time of that Paula Vennells email to Alice
 25 Perkins, saying that you had been briefed, you were

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1 aware of that concern?
 2 **A.** Yes, yes.
 3 **Q.** I said I'd move on to the issue of the Helen Rose
 4 Report, and I'm going to do that now. Could we please
 5 turn to POL00196707, and if we could start on page 5,
 6 please. Thank you. There's an email here from you to
 7 Rodric Williams and the subject is "CEO's report text on
 8 criminal cases review".

9 So this was going to be a report from Paula
 10 Vennells. Is that to the Board?
 11 **A.** Yes, this was part of -- as part of each Board meeting
 12 there would be what's known as the CEO's report, which
 13 is a four or five-page summary of issues going on across
 14 the business and part of my job was to collate the
 15 production of that report.

16 **Q.** You say:
 17 "Hi Rodric -- as discussed, here's the text.
 18 Grateful if you could amend as appropriate ..."
 19 The text as drafted at that point was as follows:
 20 "Our criminal barrister, Brian Altman, has now
 21 completed his review of the approach we are taking to
 22 reviewing cases that have been subject to prosecution,
 23 in particular looking at whether we are complying with
 24 our duty to disclose the findings of the Second Sight
 25 Report to the defence team in cases where it is

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1 provided some input. So, in short, this text was
 2 a synthesis of what I'd been given from the team. So
 3 this is basically their substance which I then edited
 4 down into a short paragraph.

5 **Q.** Can we scroll up, please. Mr Williams responds. He
 6 says:
 7 "... I have highlighted my amendments in bold below.
 8 "Please note [and there are two points]:
 9 "I have left in 'fundamentally sound' as Brian uses
 10 it in his report ..."

11 But then he says:
 12 "Brian's view on the CCRC is that we have 'responded
 13 to the Criminal Cases Review Commission appropriately
 14 ... but should the Commission continue to show interest
 15 in these cases there might have to come a time when Post
 16 Office considers sharing Cartwright King's review
 17 findings with the Commission, and cooperating with the
 18 Commission'."

19 So Mr Williams is highlighting there that the
 20 section on the Criminal Cases Review Commission needs to
 21 be a little bit more nuanced because it might be that
 22 the Post Office do have to, in due course, cooperate
 23 with them?

24 **A.** Yes, yeah, and I mean to explain, part of -- the CEO's
 25 report itself tended to be very concise but it was

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1 appropriate to do so."

2 Just pausing there had you, by this stage, read
 3 Mr Altman's report?

4 **A.** No, I don't believe I ever received the Brian Altman
 5 report. The first time I saw the actual report was when
 6 it was disclosed to me a few weeks back.

7 **Q.** You say:

8 "His conclusion is that our approach is
 9 'fundamentally sound' ..."

10 That's in quotation marks.

11 "... providing us with strong grounds to resist any
 12 formal review of our historic prosecutions (for example
 13 by the Criminal Cases Review Commission). To date,
 14 following several sifts our external firm of solicitors
 15 has identified 11 cases where disclosure is required.
 16 It is now a matter for the defence in those particular
 17 cases to determine what action (if any) they might take
 18 in light of this additional information."

19 How did you draft that if you hadn't read
 20 Mr Altman's report?

21 **A.** So this drafting was based on -- I think there was
 22 a first draft produced by Andy Holt who was then the
 23 Programme Manager for what was now known as the Sparrow
 24 process. I'd raised some questions on that, I think
 25 that had then been farmed out to Andy Parsons who had

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1 accompanied bid Chief Executive, who would then deliver
 2 it in the Board, alongside a verbal briefing. So part
 3 of the process of this was, alongside the report itself
 4 giving Paula background notes, so she could voice over
 5 more detail. So this might be the type of thing which
 6 fed into her background briefing.

7 **Q.** But this was the actual wording which went directly to
 8 the Board -- I mean, not this particular wording, we'll
 9 come to the wording, but the ultimate CEO report text
 10 would go to the Board?

11 **A.** Yes, yes.

12 **Q.** He has added after "Second Sight" regarding disclosure
 13 of the Helen Rose Report, and he has amended the wording
 14 regarding the Criminal Cases Review Commission to say
 15 that Mr Altman's review has enabled us to assert to the
 16 Criminal Cases Review Commission that:

17 "... insofar as our historic prosecutions are
 18 concerned, we responded to the Second Sight Report in
 19 a prudent and responsible manner."

20 So it's watered down in light of that caveat from
 21 Mr Altman, it seems?

22 **A.** Yes.

23 **Q.** If we scroll up, we can see your response. You say:

24 "Hi Rodric -- thanks for this. Is the Helen Rose
 25 Report a key part of the disclosure? If so I think

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1 we'll need to include a reference to it in square
2 brackets below. But we'll also need a sentence to
3 explain what it is, as Paula and the Board won't have
4 heard of it. Please could you suggest some wording?"

5 If we scroll up, we can see Mr Williams' response.
6 He says:

7 "Cartwright King advised that the Helen Rose Report
8 meets the test for disclosure (ie it might undermine the
9 prosecution's case or assist the accused's), and is
10 therefore being disclosed where appropriate.

11 "I have added a very high level sentence to address
12 this (again in bold). I have quite a bit of further
13 information on the Helen Rose Report, so can go into it
14 in more detail if required. Please let me know if you
15 would like me to do so, or if you would like to See any
16 of the underlying documents (eg the report itself, or
17 Cartwright King's or Brian Altman's advice on it)."

18 He has there inserted a summary of the Helen Rose
19 Report, and says:

20 "The Helen Rose Report was prepared in June 2013 by
21 a member of the Post Office Security Team, and refers to
22 emails with Fujitsu from January and February 2013
23 suggestive of there being issues with Horizon, training
24 and support."

25 It's worded slightly strangely there at the end,
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1 from her and the Board! Please could you send me the
2 report and any associated advice, etc?"

3 If we scroll up, he said:

4 "I thought as much!

5 "Can I suggest we take 10-15 minutes tomorrow
6 morning to go over what we have and where it goes to
7 help me tailor the response?"

8 Then above you say:

9 "... yes, agree a quick catch-up tomorrow ...

10 "As you'll see from the text I've just
11 re-articulated, I've decided it's probably better not to
12 mention the Helen Rose Report specifically, as it will
13 only serve to confuse things with the Board (although
14 I will still need to give Paula background notes on the
15 issue).

16 "I've also cut back the text review of past cases --
17 hope this still works."

18 Now, having seen that there are still issues with
19 Horizon, rather than removing reference to that report,
20 wouldn't you want to find out quite a bit more about it
21 at that stage?

22 **A.** Yes, and I think as we'll hopefully come on to, part of
23 the follow-up actions was to arrange a proper briefing
24 for the team to pull on these issues. I think my
25 concern at this point -- and this is another late-night

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1 isn't it, with the comma? It was your reading of that
2 it was suggestive of there being issues with Horizon and
3 issues with training and support, or that it identified
4 issues with Horizon training and support?

5 **A.** I think candidly I wasn't sure, and this wording begged
6 lots of questions to me, and it felt like we were
7 getting into territory which needed much more
8 explanation and you'll probably going to come on to
9 it --

10 **Q.** Because --

11 **A.** To be honest, I wasn't -- this raised more questions to
12 me than it answered. I don't think it particularly
13 helped explain the full implications of the Helen Rose
14 Report.

15 **Q.** No, but not just questions but also presumably concerns,
16 because there appears to be a report which is suggestive
17 of there being issues with Horizon.

18 **A.** Yes, yeah, it was -- yes, absolutely, and it was the
19 first I'd heard of this and I was pretty sure it wasn't
20 something which had been briefed to Paula or the Board
21 at that point.

22 **Q.** If we look above, you say:

23 "Thanks very much Rodric. Unfortunately I think
24 I probably do need to give Paula more information on
25 this, as this is going to raise all sorts of questions

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1 email -- I think I was concerned that this
2 potentially -- I didn't know what to make of this
3 reference to the Helen Rose Report. All I did know was
4 it was new news and Rodric's explanation in the
5 preceding text, as I say, raised more questions than it
6 answered. Candidly, I was quite concerned about putting
7 in information into a report going out in Paula's name
8 when she wasn't familiar with this issue. It felt
9 inappropriate to put something in a report in her name
10 before she'd been properly briefed.

11 So I took the judgement call, late at night, to take
12 it out and instead arranged for a briefing for her and
13 then she could decide what to do with that information.
14 So it was a kind of judgement late at night, based on
15 limited information. I think that the key thing, which
16 we'll come on to, is I then arranged a briefing -- the
17 team to give Paula a briefing on the topics so she could
18 take a view.

19 **Q.** Were you present at the briefing?

20 **A.** No, I was just about to go on leave, so I commissioned
21 Belinda Crowe to coordinate that briefing and give it to
22 Paula.

23 **Q.** Yes. We'll come and look at that document but, before
24 we do, can we please turn to the first page. Rodric
25 Williams has responded to you, the next morning:

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1 "Thanks, Martin -- I'll comment separately on your
2 revised text (which read well), as amended by Andy Holt.

3 "I attach a Briefing Note from Cartwright King
4 addressing the issue we discussed yesterday, namely:

5 "i. Update on the criminal case reviews to date ...

6 "ii. A summary of the appeal steps a defendant can
7 take in those (few) cases where further disclosure had
8 been made ...

9 "iii. Whether the 'Helen Rose Report' is in the
10 public domain (it's not) (copy attached along with
11 covering letter).

12 "I think it is sensible to keep references to the
13 Helen Rose Report at a minimum as it may not be a live
14 issue going forward. You will see from the final
15 paragraph of the Briefing Note that it is 'unlikely to
16 require disclosure in any further cases and will not be
17 disclosed in any pending or future prosecution'. Brian
18 Altman QC was also of the view that it 'added very
19 little'."

20 We can see the attachments that Mr Williams sent
21 alongside that email. The first is the Helen Rose
22 Report. Can we turn to POL00196708. The document I'm
23 taking you to is known as a family document, so we are
24 sure that those are the actual attachments to this
25 email, though other versions exist. But if we look at

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1 email where he quotes Brian Altman and generally gives
2 quite a lot of reassurance that it isn't a material
3 issue and doesn't add very much. So I think, at that
4 point in time, I was probably reassured that, actually,
5 maybe this isn't such a material part of the disclosure,
6 but, I mean, what I would emphasise is I did still
7 arrange for the team to give a briefing to Paula and to
8 follow up on it, and --

9 **Q.** If we look at the second attachment, that's POL00196709,
10 this is the briefing note that was produced by
11 Cartwright King that's referred to in Mr Williams's
12 email. If we scroll over the page, please, we can see
13 there's reference -- one of the purposes of this was to
14 provide a short explanation of the status of the Helen
15 Rose Report. If we look at paragraph 4 on that page, we
16 see there it says:

17 "The Helen Rose Report is not in the public domain
18 and should not be placed in the public domain.
19 Nevertheless it is subject to the disclosure rules ...

20 "As a matter of law, a defendant to whom any
21 material ... is disclosed is constrained from using that
22 material ..."

23 If we scroll down, it says there:

24 "Because this report goes only to the apparent
25 knowledge of [Gareth Jenkins] at the time of his writing

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1 this document, this is the Helen Rose Report, but it is
2 the redacted version of the Helen Rose Report. And, if
3 we scroll down, over the page, we can see this is the
4 one where in fact Gareth Jenkins' name has been
5 redacted.

6 What we do see, though, on page 3, about three
7 quarters of the way down, is the part of the Helen Rose
8 Report where it says:

9 "I know you are aware of all the Horizon integrity
10 issues."

11 Did you read this at the time?

12 **A.** I think I may have skim read it. I'm not sure I'd have
13 known what to make of it. It's obviously a relatively
14 operational and technical report. I think I skim read
15 it and I didn't come away from it thinking, "Oh, I see
16 what the key issue is here".

17 **Q.** So we had Mr Williams suggest the form of words in that
18 briefing to the Board that said, "Suggestive of there
19 being issues with Horizon".

20 That particular paragraph suggests perhaps that
21 there are issues with Horizon. But that wasn't
22 something that you thought of at the time?

23 **A.** I'm not sure if -- so this particular paragraph doesn't
24 jump out, clearly wrongly in hindsight. I probably put
25 more weight on some of the text in Rodric's covering

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1 of his expert court reports, its status as a disclosable
2 document ends where he no longer provides such reports.
3 Accordingly, it's unlikely to require disclosure in any
4 further cases and will not be disclosed any pending or
5 future prosecution."

6 There is also another attachment to that email it's
7 POL00196710, and that's an example covering letter that
8 was sent out regarding disclosure, and it's the second
9 paragraph that refers to the Second Sight Report and the
10 Helen Rose Report.

11 I'd like to take you to the final report to the
12 Board, that's POL00196706. So this is the ultimate
13 briefing that was produced, presumably finalised after
14 you had received those documents?

15 **A.** Yes.

16 **Q.** If we have a look at the third bullet point, it's dated
17 24 October:

18 "Our external firm of criminal solicitors,
19 Cartwright King, has now completed a review of 301 cases
20 subject to past prosecution to identify whether we have
21 a duty to disclose the findings of the Second Sight
22 Report and associated issues."

23 So now the Helen Rose Report is now referred to as
24 "associated issues"; is that right?

25 **A.** Yes.

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1 Q. "[Cartwright King] has concluded that disclosure is
2 appropriate in 10 of these cases, and a short letter has
3 therefore been sent to each of the dense teams to bring
4 their attention to the report. It is now a matter for
5 the defence in each case to determine what action, if
6 any, they might take in light of this additional
7 information. We are also awaiting an unknown number of
8 further historical prosecution files from Royal Mail,
9 although at this stage we have no reason to believe
10 these will subsequently increase the number of actual
11 disclosures. In view of the potential interest from the
12 Criminal Cases Review Commission, we have also asked our
13 criminal barrister, Brian Altman QC, to conduct
14 an independent review of the overall process we have
15 taken to review past cases, reaching the conclusion that
16 our approach is 'fundamentally sound'."

17 So that was the ultimate summary of the passage that
18 we have been looking at. Perhaps we could bring it up
19 on to screen alongside POL00196707, page 4 of that
20 document, if that's possible. Thank you. So if we
21 scroll down slightly on the left-hand side we can see,
22 it was that second passage that I took you to, earlier,
23 the slightly more nuanced approach to references to the
24 Criminal Cases Review Commission, and it seems as though
25 that, to some extent, has been lost in the final

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1 expected role going forwards (bearing in mind that
2 certain Board members will have a strong expectation
3 that they should be out of the process by the end of
4 December -- so we may have to manage these
5 expectations)."

6 This is a separate issue but it's something we
7 discussed earlier about moves to limit or end Second
8 Sight's involvement.

9 Then:

10 "Any additional detail on the settlement policy
11 which we're in the process of developing ..."

12 I think it's the final bullet point here:

13 "Any explanation of the issues around the review of
14 past criminal cases, which Rodric can help provide,
15 covering: a) what exactly has been disclosed so far; and
16 b) our best guess of the implications of these
17 disclosures (ie explaining that at this stage we have no
18 reason to believe that this means past cases will be
19 found to be unsafe)."

20 Just pausing there, how had you formed that view?

21 A. I think that had been informed by the emails we'd seen
22 earlier from Rodric and others, including some fairly
23 reassuring quotations from the Brian Altman reports.

24 Q. "I've attached an email from Rodric, which contains some
25 of the answers to these questions, but would be useful

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1 briefing; would you agree with that?

2 A. Yes, it's clearly gone through further editing, yes, I'd
3 agree with that.

4 Q. Can we please turn to POL00196705, and this is the
5 reference to the briefing that you have mentioned. It's
6 28 October 2013. One of those attachments is the email
7 chain that we've been looking at with those various
8 attachments, and you say as follows:

9 "Hi Belinda, here's the final text on Sparrow [so
10 that's the final text that I just took you to, the
11 separate attachment] which went into the CEO's report.
12 As discussed earlier, very grateful if you could
13 coordinate the briefing which Paula will need ahead of
14 the Board to bring her up to speed on the issues and
15 prepare her for any difficult questions from the
16 [Non-Executive Directors]. It now looks highly likely
17 that Paula won't be able to attend tomorrow's steering
18 group -- if we can fit in a separate short catch-up for
19 you, Chris and her, we will but this might not be
20 possible."

21 Then there are various bullet points, one is "Update
22 on any mediation/Working Group process", including
23 feedback from Tony Hooper's first meeting in the Working
24 Group:

25 "Linked to this, an explanation of [Second Sight's]
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1 to have this together in one place."

2 Then if we look at the bottom of that email, it
3 says:

4 "The Board is on Thursday, so it would be useful for
5 her to have this by tomorrow evening or Wednesday
6 morning. As you know, I'm on leave after today -- I may
7 have an opportunity to log on in the evenings to look at
8 things, but if not then I suggest you send directly to
9 Paula copied to me."

10 So the work that you had been carrying out in the
11 previous days on the CEO's report to the Board and the
12 information that you had gathered from Rodric Williams
13 has now just been handed over Belinda Crowe to summarise
14 for Paula Vennells; is that right?

15 A. Yes, essentially.

16 Q. Did you keep tabs on what form the briefing ultimately
17 took?

18 A. I don't believe I did. I think I followed it up -- by
19 the time I returned, the Board meeting had already
20 happened, so the kind of the moment had passed but
21 I recall -- I remember seeing confirmation that
22 a briefing had been sent.

23 Q. But you don't recall reading the briefing?

24 A. No, by then I was on leave.

25 Q. We saw those discussions about the Helen Rose Report and
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1 its implications, and your view was to leave it out of
 2 the Board -- the paper that went to the Board but
 3 I think you had confidence that it would be raised by
 4 Ms Vennells at the Board. Did you take any steps to
 5 make sure that there was a proper briefing in that
 6 respect?
 7 **A.** I think I relied on -- I clearly here have passed the
 8 baton to Belinda to coordinate with input from Rodric,
 9 I've relied on that process and that input to Paula to
 10 get to the right answer.
 11 **Q.** What was Belinda Crowe's role?
 12 **A.** I think by now she had just taken over as Programme
 13 Manager for what was then called the Sparrow process, so
 14 coordinating all of these workstreams.
 15 **Q.** I think you said that you didn't have a good knowledge,
 16 or any knowledge, of the contents of the Helen Rose
 17 Report before you had seen it, or even the Brian Altman
 18 report up until very recently. Were you aware of her
 19 state of knowledge of the underlying issues when you
 20 sent this email?
 21 **A.** I was aware she was -- she was also new to these topics
 22 and would be heavily reliant on input from Rodric to get
 23 to the right information. I think Rodric was copied
 24 into this email.
 25 **Q.** Thank you. Can we please turn to POL00029707. This is
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1 The first is ShEx, and your involvement and
 2 relationship with them. Could we please turn to
 3 UKGI00001852.
 4 I think you said you were the main liaison when it
 5 came to non-communications matters; is that right?
 6 **A.** I think -- yeah, I provided an informal channel of
 7 communication, if they needed to pick up the phone to
 8 someone, I was a point of contact they could use, yes.
 9 **Q.** If we look at the bottom of page 2, we see
 10 correspondence between Mr Batten and Rodric Williams,
 11 and you're copied in to this email. This is an email
 12 that we saw with Jo Swinson because she was going to be
 13 making an announcement to Parliament and they were
 14 seeking information about numbers of convictions. If we
 15 look above, there's a series of questions that have been
 16 posed by Mr Gibson of the Shareholder Executive.
 17 If we go to the first page, at the bottom of the
 18 page, Susan Crichton has said, "On to it". So they're
 19 on to finding out the questions, and also "we are
 20 working on this".
 21 Then if we scroll up slightly, Mr Batten said -- and
 22 this is 16 July, so a week later:
 23 "Did Susan, Rodric or Martin ever come back to
 24 either of you on this? (I know [Post Office] often drop
 25 me off their copy lists -- I try not to take it
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1 a much later email, and I don't think you're involved in
 2 this correspondence, but it's a document that I took
 3 Mr Parsons to, where he talks about the Helen Rose
 4 Report. If we scroll down to the penultimate paragraph,
 5 he says as follows:
 6 "Putting this issue aside, the real (and
 7 confidential) reason that the report was disclosed was
 8 because Helen's comment at the bottom of page 3 suggests
 9 that it was widely known that there were problems with
 10 Horizon. This statement (regardless of whether it is
 11 correct) could have been used to attack Gareth Jenkins'
 12 credibility as [Post Office's] Horizon expert as he had
 13 previously stated that there were no problems with
 14 Horizon."
 15 Is that something that you were aware of?
 16 **A.** No, no. This very clear explanation of the implication
 17 of the Helen Rose Report wasn't apparent to me until
 18 I read -- until this document was disclosed to me and
 19 I have followed some of the other evidence. So
 20 candidly, the penny only dropped very recently on
 21 exactly why the Helen Rose Report was significant. That
 22 wasn't apparent to me in this very clear way at the
 23 time.
 24 **Q.** Thank you. I have two very brief topics to address
 25 before I hand over to others.
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1 personally)."
 2 Then above we have Mr Whitehead saying:
 3 "Sadly they have a habit of dropping everybody off
 4 when we seek 'awkward' data. I have not seen anything
 5 and my guess is that without a chaser, they'll
 6 unilaterally decide we don't need it!"
 7 Was that typical of your relationship with UKGI?
 8 **A.** I don't think -- I think what it probably does reflect
 9 is a bit of mutual frustration on the way information
 10 was requested and shared between the business and UKGI
 11 and there were two perspectives on that. Clearly what
 12 we've seen here is a frustration from the ShEx team, not
 13 getting the information they need. On the other side,
 14 the frustration from the business is requests appear to
 15 come in quite -- in an unstructured way at short notice,
 16 and there were frustrations on both sides and it clearly
 17 wasn't always working very well.
 18 I think over time, we moved on to a more structured
 19 basis, to the benefit of both sides, but I think this
 20 does absolutely reflect a bit of a kind of teething
 21 problem on the early relationship between the business
 22 and the shareholder, post-separation.
 23 **Q.** Could we please turn to POL00373845, and this relates to
 24 Mr Callard becoming a new Non-Executive Director of the
 25 Post Office. So we're moving on now to February 2014.
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1 If we look at the bottom email, Ms Vennells sends
2 an email to a group, and if we look slightly below that,
3 just at the top of the next page, she says:

4 "Richard's scope has not yet picked up Sparrow or
5 Business Transformation. It will as he is attending
6 next week's Board meeting. But as this is the case,
7 I suggest that we leave him off the ShEx review agenda
8 as he will be well briefed by then."

9 If we scroll up, please, to your response, you say
10 as follows:

11 "On a separate but related topic, it's just struck
12 me this evening (belatedly) that I, Alwen or Chris D (or
13 a combination of all three) need to get into the
14 discipline of reading the draft Board papers with
15 a specific focus on checking for ShEx sensitivities, now
16 that [Mr Callard] will be receiving them. There are
17 numerous small points we need to watch out for. I'll
18 read through the ones I haven't checked in the morning,
19 kids permitting."

20 Can you assist us, why would you need to redraft
21 papers with a specific focus on checking for ShEx
22 sensitivities?

23 **A.** So I think this would have been a general point. It was
24 recognising -- whilst it was quite right that we moved
25 to the position of ShEx having a representative on the

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1 Was about that removing Second Sight or limiting
2 their involvement?

3 **A.** I think that may well have been -- that's probably what
4 it was referring to. I think, by then, there had been
5 some ongoing debates with the business about Second
6 Sight's role, so yes, that's highly likely to be that --
7 what I was referring to.

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

9 We've spoken today about one particular role you
10 had. How do you consider that role as Chief of Staff
11 prepared you for your subsequent roles at the Post
12 Office?

13 **A.** Well, it clearly gave me a broad insight across the
14 business. A lot of my time as Chief of Staff was
15 actually spent more on the strategy and funding side and
16 that was kind of very squarely what I worked on in the
17 next job.

18 **Q.** Is that as Group Strategy Director?

19 **A.** Yes, yes, and, I mean, more generally, this whole
20 experience has, I think, given me lots of lessons for
21 subsequent roles in the Post Office.

22 **Q.** Have you taken part in any lessons learned exercises?

23 **A.** I mean, I think it's fair to say the whole business has
24 been going through a lessons learned process over the
25 past few years. I think it's kind of built into the

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1 Board that was new for the business, and there were
2 sometimes tensions and conflicts of interest,
3 particularly part of our relationship between ShEx and
4 the Board of ShEx was our funder, so for example we
5 might be putting papers to the business which are
6 relevant to our funding position.

7 Previously, the business could have drafted papers
8 without worrying about ShEx seeing that paper. So
9 clearly there were, I think, it's -- there was
10 a potential for sensitivities across the piece, as
11 I say, numerous small sensitivities. It just felt like
12 good discipline to make sure there is a kind of filter
13 on the papers, that we are reviewing the papers for any
14 watch outs.

15 **Q.** "NB on your point below about Sparrow, Belinda and I met
16 [Richard Callard] yesterday afternoon so he's now fully
17 up to speed (and understands why this was high on your
18 list of things that keep you awake at night!)."

19 What did you mean there?

20 **A.** I think really it was clearly it was a major issue for
21 the business and major issue for the Chief Executive,
22 and Richard Callard was now briefed on that.

23 **Q.** "He now has a good understanding often the handling
24 issues around Second Sight and the scenarios in which we
25 may need further support/cover from ministers."

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1 business now.

2 **Q.** For you personally, what have you particularly
3 identified as your own lessons to be learnt from the
4 role that you played?

5 **A.** So I think there's a number. I think the first one,
6 it's very apparent in hindsight that I had been -- the
7 business was caught up in groupthink and I was part of
8 that, and at no point do I see myself properly stepping
9 outside that and challenging it. And I deeply regret
10 that and I think that's been a hugely important lesson
11 to me.

12 I think a second lesson which links to that, at that
13 point in my career, I would have taken advice from legal
14 experts or IT experts at face value and I'm now far more
15 aware that advice from experts needs to be properly
16 challenged and scrutinised. Everyone has biases in the
17 advice they need to provide and that needs appropriate
18 scrutiny.

19 And I think the third lesson is the important,
20 particularly for the roles which I do, which tend to be
21 working at the centre of the business working on
22 high-level strategy is balancing that with
23 an understanding of individual perspectives.

24 **MR BLAKE:** Thank you.

25 Sir, it's now time for some questions from Core

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1 Participants. Are you happy for us to proceed with
 2 Mr Henry, and then perhaps take a short break. We have
 3 a very small number of questions from Mr Jacobs,
 4 Mr Moloney and Ms Watt, which shouldn't be too long.
 5 I think Mr Henry has the larger number of questions.
 6 **SIR WYN WILLIAMS:** Well, I'll do whatever suits the
 7 transcriber best on this occasion. So we've been going
 8 for --
 9 **MR BLAKE:** 1 hour 10 minutes.
 10 **SIR WYN WILLIAMS:** I don't want to necessarily circumscribe
 11 Mr Henry but if he's going to be ten minutes we'll do as
 12 you say, if he's going to be 20 minutes, I think it's
 13 probably appropriate to have a break.
 14 **MR HENRY:** Sir, I think the shorthand writer would like
 15 a break.
 16 **MR BLAKE:** Yes. So perhaps we could take a ten-minute break
 17 now.
 18 **SIR WYN WILLIAMS:** Fine. All right.
 19 (3.06 pm)
 20 (A short break)
 21 (3.16 pm)
 22 **MR BLAKE:** Thank you, sir. We have Mr Henry, followed by
 23 Ms Watt, followed by Mr Moloney.
 24 **SIR WYN WILLIAMS:** Fine.
 25 **MR BLAKE:** Thank you.

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1 **Q.** You recall that from as long ago as 2013 but you did not
 2 mention it once in your witness statement. You were
 3 holding it back, weren't you?
 4 **A.** I focused my witness statements on the questions posed
 5 to me as part of my Rule 9 Request there. There was
 6 nothing on this specific topic.
 7 **Q.** But it was a very significant matter and you did not
 8 volunteer it, did you?
 9 **A.** Candidly, I certainly didn't appreciate the significance
 10 of this matter at the time. I didn't appreciate it when
 11 I constructed my witness statements. Everything I've
 12 heard since then, I do understand its important but it
 13 was certainly not a deliberate withholding of that.
 14 **Q.** You are telling the Inquiry Chairman that you did not
 15 appreciate its significance at the time. You obviously
 16 appreciated its significance at the time when you were
 17 told it. Correct?
 18 **A.** In the terms I described earlier.
 19 **Q.** You know the purpose of this Inquiry, it's a highly
 20 material issue, an issue of extraordinary importance.
 21 I suggest that you were hoping it would not be
 22 discovered.
 23 **A.** No, that's not the case.
 24 **Q.** You knew that the Inquiry was not aware of the issue at
 25 the time and hadn't unearthed the email from Paula

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1 **Questioned by MR HENRY**
 2 **MR HENRY:** Mr Edwards, you were part of an Executive Team
 3 that used all its guile and skill to suppress the
 4 reputational and financial risk of historical
 5 prosecutions being reopened, weren't you?
 6 **A.** I think I was clearly part of an Executive Team which
 7 didn't do enough to put this right at that stage.
 8 **Q.** You did precisely the opposite of furthering the right;
 9 you were actually involved in suppressing the matter,
 10 weren't you?
 11 **A.** I'm not sure I'd agree with that.
 12 **Q.** You were even complicit in a cover-up concerning the
 13 unsafe witness, were you not?
 14 **A.** I certainly wasn't, no.
 15 **Q.** Now, you do not mention the issue of the unsafe witness
 16 at any stage in your witness statement of the 18 April
 17 2024, nor in that witness statement do you mention any
 18 conversation you had with Paula Vennells in respect of
 19 that issue of the unsafe witness; do you accept that?
 20 **A.** Yes, it's not in my witness statement.
 21 **Q.** Yet when Mr Blake asked you about this very significant
 22 conversation, you offered an account that the unsafe
 23 witness, so you were told by Ms Vennells, was implicated
 24 in five cases; is that correct?
 25 **A.** I recollected that being a small number, yes.

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1 Vennells to Alice Perkins, but you were aware of the
 2 issue, Mr Edwards, and you didn't volunteer it. That's
 3 the truth, isn't it?
 4 **A.** No, that's not the case. I didn't recollect that email,
 5 I didn't particularly have a strong recollection of this
 6 issue. I didn't -- my appreciation of the significance
 7 of this issue has been very recent. I certainly did not
 8 appreciate the significance of this issue at the time.
 9 **Q.** I suggest that that cannot be right. At the very least,
 10 from what you knew at the time, back in 2013, was the
 11 risk that five people may have been convicted on the
 12 back of evidence from an unsafe witness. That surely
 13 would have been obvious to you?
 14 **A.** As I described, the account I was given of this was it
 15 was clearly important. My understanding at the time was
 16 that was going to be disclosed to the past prosecutions
 17 but I was not led to believe at the time that it was
 18 highly material on top of other information which had
 19 been disclosed. I completely did not appreciate the
 20 significance of this at the time.
 21 **Q.** So when you say that your understanding at the time was
 22 that it was going to be disclosed to the past
 23 prosecutions, was that something that just floated into
 24 your head or were you told that by Paula Vennells?
 25 **A.** That was my under --

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1 Q. Where did you get the understanding from?
 2 A. That was the nature of the conversation, indeed, I think
 3 in the email we looked at from Ms Vennells to (*unclear*)
 4 it talks about the disclosure of this information.
 5 Q. On the contrary, that email reads -- and there's no need
 6 to get it up on screen:
 7 "My concern re Sparrow currently is our obligations
 8 of disclosure re an unsafe witness. The representative
 9 from Fujitsu made statements about no bugs which could
 10 later to have been seen to be undermined by the Second
 11 Sight Report. We do not think it material, but it could
 12 be high profile. Martin E is briefed if you want more
 13 detail. This is just in case."
 14 Do you want to reflect on the answer you've just
 15 given?
 16 A. I think what that email refers to, it talks about
 17 obligations re disclosure. My -- as I said my
 18 recollection of this conversation is hazy, but as
 19 I understood it, Cartwright King, as our external
 20 lawyers, were reviewing the disclosure of this
 21 information to the past cases and, as Paula goes on to
 22 describe, it wasn't viewed to be material. That is
 23 consistent with my recollection and understanding at the
 24 time.
 25 Q. Well, I'll come back to that. I want to go quickly to
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1 A. Yes, I'd agree with that.
 2 Q. You were told, you claim by Ms Vennells, that the unsafe
 3 witness concerned five cases. Five, 50 or one case:
 4 an unsafe witness had given evidence against
 5 subpostmasters and people had been convicted, hadn't
 6 they; you knew that?
 7 A. Yes.
 8 Q. Right. Now, you were the Chief Executive Officer's
 9 Chief of Staff and yet you claim you hadn't read the
 10 Altman General Review of 15 October 2013, before
 11 drafting her report to the Board?
 12 A. I hadn't -- no, I hadn't been given that document.
 13 Q. You stand by that?
 14 A. Yes.
 15 Q. You're admitting negligence, aren't you? It would be
 16 negligent to draft a Chief Executive Officer's report to
 17 the Board on a very serious matter, without having read
 18 the Altman General Review?
 19 A. In the role I was performing -- so in that Chief
 20 Executive's report, I'd been covering maybe a dozen
 21 major topics on the business, I was heavily dependent,
 22 completely dependent on the input from Subject Matter
 23 Experts. I didn't have the capacity to read every
 24 document and do everything they were doing. I think in
 25 hindsight, I would agree there was not enough scrutiny
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1 your statement, no need to get it up on the screen I'll
 2 read it verbatim, paragraph 13.
 3 "I believe I first became aware of concerns raised
 4 about bugs, errors or defects with Horizon due to the
 5 campaigning work of Alan Bates and the Justice for
 6 Subpostmasters Alliance. On 4 October 2012, a couple of
 7 weeks after I joined the Post Office, I attended
 8 a meeting with Paula Vennells, James Arbutnot and Alan
 9 Bates of the JFSA in relation to the Second Sight
 10 investigation. I attended the meeting in a note-taking
 11 capacity only. During the meeting, alleged Horizon
 12 errors were raised by Alan Bates."
 13 I don't need to take you to the document but your
 14 notes of that meeting are recorded at POL00295635, notes
 15 which are dated 5 October 2012. Amongst those notes:
 16 "Meeting with JA and AB. Paula said it was
 17 absolutely essential that the judicial process was
 18 flawless and, therefore, would consider this point which
 19 had been raised by [Sir Alan Bates] in detail."
 20 That was about unfairness to subpostmasters.
 21 If it is absolutely essential, Mr Edwards, that the
 22 judicial process is flawless, would you agree that that
 23 would mandate disclosing to the defence any wrongdoing
 24 by an expert who had secured a conviction for the Post
 25 Office against a hapless defendant?
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1 by the Executive Team of, as we've heard, there wasn't
 2 enough sharing of legal advice. I didn't see that at
 3 the time.
 4 Q. But this is totally contrary to your role. A top,
 5 politically astute and well-connected Queen's Counsel
 6 has been appointed to do a general review and yet are
 7 you telling the Chairman that nobody in the Executive
 8 Team read the general review by Brian Altman QC?
 9 A. I can only comment on -- I didn't see it.
 10 Q. It's totally contrary to your role because, when you
 11 were suggesting, at an early stage in your evidence --
 12 but I think you've resiled from it -- that you were
 13 a mere conduit, nevertheless you were digesting and
 14 appraising material that was directed to the CEO, so you
 15 could apprise her of the contents. You must have read
 16 the Altman General Review?
 17 A. I did not read the Altman General Review. I did not see
 18 it.
 19 Q. Right, well we see in the email that I have quoted,
 20 already, that Paula Vennells used the term "material"
 21 when she was writing her email to Alice Perkins. In the
 22 Altman General Review, the term "material" is mentioned
 23 35 times. Were you familiar with the term "material"?
 24 A. Not specifically, no.
 25 Q. Yet, according to your boss, "Martin E is briefed if you
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1 want more detail" -- and I emphasise "more detail" --
 2 "this is just in case".
 3 Are you telling the truth, Mr Edwards?
 4 **A.** I am absolutely. I gave my evidence on that earlier.
 5 I was given as a point of contact for Alice, if she
 6 needed more detail. In practice, I'd clearly be reliant
 7 on the legal teams to provide that.
 8 **Q.** So, although you were briefed on the issue, again,
 9 you're merely saying that you're just, as it were,
 10 a conduit, that she'll contact you and then you'll put
 11 her in touch with who: Rodric Williams, Hugh Flemington,
 12 et cetera, et cetera?
 13 **A.** Yes, I think it would have been more appropriate for her
 14 to be in contact with the General Counsel but, as you're
 15 aware at that point in time, one General Counsel was
 16 leaving and another one was just about to join. So
 17 I was there as a point of contact for Alice but, yes,
 18 I would have been reliant on getting answers to the
 19 questions from the Legal team.
 20 **Q.** Now, you knew why General Counsel was leaving,
 21 presumably: because you were the Chief of Staff to Paula
 22 Vennells. What had she told you about the departure of
 23 Susan Crichton?
 24 **A.** I was aware that there had been tensions between Susan
 25 and Alice and the broader Board. I wasn't party to all

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1 the issue."
 2 Not, "I will get Flemington, Williams -- God
 3 forbid -- Singh to give background notes on the issue;
 4 I will still need to give Paula background notes on the
 5 issue".
 6 How were you going to do that, if you hadn't read
 7 Altman?
 8 **A.** When I say "I will need to give Paula background notes",
 9 that doesn't mean I will need to be responsible for
 10 drafting them. My role was to make sure Paula had the
 11 briefing she needed. I was heavily dependent on Subject
 12 Matter Experts to provide that and I therefore arranged
 13 for that to be provided.
 14 **Q.** I suggest that the Helen Rose Report -- and we can deal
 15 with this very quickly -- would reveal that Gareth
 16 Jenkins had a credibility problem, that he'd not been
 17 frank about bugs, errors and defects, and Mr Blake took
 18 you to paragraph 173 of the Altman General Review, which
 19 says just that. You were making sure the Board were not
 20 told about a document which might have brought up the
 21 potentially high-profile issue of the unsafe witness;
 22 isn't that right?
 23 **A.** No, absolutely not.
 24 **Q.** If, as the Helen Rose Report suggested, it was widely
 25 known that there were problems with Horizon, that could

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1 of the detail which the Inquiry has now seen.
 2 **Q.** Did Paula Vennells say that Susan Crichton's loyalties
 3 were misplaced and that she was ascribing too much
 4 loyalty to her professional obligations?
 5 **A.** No, that wouldn't be the type of conversation we'd
 6 have -- she would have with me.
 7 **Q.** Yet you were her Chief of Staff?
 8 **A.** Yes.
 9 **Q.** I want to go now to POL00372558, and I want to enquire
 10 with you about why you took certain decisions in respect
 11 of this exchange between you and Rodric Williams.
 12 Again, it's in the context of the report of the CEO to
 13 the Board. Just dealing with that:
 14 "As you'll see from the text I've just
 15 re-articulated, I've decided it's probably better not to
 16 mention the Helen Rose Report specifically, as it will
 17 only serve to confuse things with the Board (although
 18 I will still need to give Paula background notes on the
 19 issue)."
 20 How were you going to do that, if you hadn't read
 21 Altman?
 22 **A.** Well, as we covered earlier, the practical step I took
 23 was to arrange for the team to give Paula a briefing on
 24 this.
 25 **Q.** "... I will still need to give Paula background notes on

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1 have been used to attack Gareth Jenkins' credibility.
 2 You can't deny that, can you?
 3 **A.** Sorry, can you repeat the question?
 4 **Q.** It's not a coincidence that you decided it's probably
 5 better not to mention the Helen Rose Report because the
 6 Helen Rose Report was welded together with the issue of
 7 Gareth Jenkins' credibility; you knew that?
 8 **A.** No, I didn't, and I think it's evident from my email
 9 exchange with Rodric that I'm none the wiser on the
 10 significance of the Helen Rose Reports. I absolutely
 11 didn't understand its significance and, as I described
 12 earlier, I didn't understand its significance until
 13 extremely recently, and I've seen other disclosures
 14 which spell it out very clearly. I did not have that
 15 awareness at the time.
 16 **Q.** You're presenting yourself as some *naïf*, and yet you're
 17 the Chief of Staff to the CEO. I suggest that your
 18 response there is dissembling.
 19 **A.** No, it's not. It's become apparent to me that there
 20 were a number of topics which, candidly, I was naive
 21 about, so I didn't understand the full details. The
 22 nature of the Chief of Staff role: I was spread across
 23 dozens of major topics across the business. It simply
 24 wasn't possible to understand the detail of everyone
 25 but, yes, candidly, I was naive on some of these topics.

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1 Q. Let me go to page 4 of that document, please. This was
2 your first stab at a *précis*, and I want to go through it
3 very, very quickly:

4 "Our criminal barrister, Brian Altman, has now
5 completed his review [et cetera, et cetera, et cetera]
6 our approach is 'fundamentally sound', providing us with
7 strong grounds to resist any formal review of our
8 historic prosecutions (for example by the Criminal Cases
9 Review Commission)."

10 Who had suggested that the Altman Review would
11 justify stonewalling the Criminal Cases Review
12 Commission?

13 A. I think, as I described earlier, this text was the
14 synthesis of some contributions from Andy Holt, which
15 I then asked some questions on, and I think it was then
16 farmed out to Andy Parsons to provide input. I took
17 that input and crafted this sentence, and sent it to
18 Rodric to check.

19 Q. Of course, he moderates it, to some extent, but was this
20 reflecting the views of Paula Vennells that had already
21 been disseminated, or were the people that you say are
22 responsible for this text quite confident that this
23 pre-packed approach would be accepted by the CEO; this
24 obdurate opposition to the appeals would be accepted,
25 without demur, by the CEO?

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1 Q. Well, we've gone through this already at great length
2 with Mr Blake but there was, if not consternation or
3 near panic, there was great anxiety in the Executive
4 Team. Mr Blake has taken you, for example, to
5 POL00098778, 28 June 2013, where Gareth Jenkins writes
6 the email saying:

7 "Lesley, attached is my final witness statement for
8 the Misra case. This was heard in Guildford Crown Court
9 in October 2010 and concerned the West Byfleet Post
10 Office."

11 You get a copy of that email; it's forwarded to you;
12 it's 28 June. So you know that Gareth Jenkins has given
13 evidence against Seema Misra and you also know that
14 Gareth Jenkins has caused a problem in the disclosure,
15 or rather non-disclosure, of bugs, don't you?

16 A. No. The second half of that is not correct.

17 Q. Well, you knew that he was the person who had spoken to
18 Second Sight?

19 A. I did not know that, no.

20 Q. I suggest that's all in the context of him suppressing
21 the evidence of bugs, errors and defects, as confided to
22 Second Sight, and that you were well aware of that?

23 A. That's not correct.

24 Q. Then on 1 July, there's a high-level briefing for the
25 Board, POL00060587. Mrs Misra is mentioned in the

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1 A. I don't know and I think, in hindsight, the CEO's report
2 was the wrong place to be -- the CEO's report covers
3 a number of major topics in very brief detail, as you
4 see, in really short paragraphs. It's really clear, in
5 hindsight, that this wasn't appropriate to be covering
6 this information. I wasn't the right person to be the
7 intermediary of this. In hindsight, this warranted
8 a separate, full briefing note from the Legal Team, and
9 that's what should have gone to the Board.

10 Q. I want to deal with the unsafe witness in conclusion one
11 final time. The evidence base, by 23 October,
12 I suggest, was that Paula Vennells knew that Gareth
13 Jenkins was unsafe. She knew that he had given evidence
14 against Seema Misra and she decided not to disclose that
15 to the CCRC or Mrs Misra's lawyers; you knew that,
16 didn't you?

17 A. No.

18 Q. In June 2013 -- because there is a run-up to this -- in
19 June 2013 it had become apparent, had it not, that
20 Gareth Jenkins had disclosed to Second Sight the
21 existence of bugs, errors and defects in the Horizon
22 system, and you were aware of that?

23 A. What I was briefed on at the time is those bugs had been
24 passed on by the Post Office team. That was what's kind
25 of contained in the briefings at the time.

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1 context of her trial. Then we've seen again, with
2 Mr Blake taking you to it, the strapline is "Re PV and
3 AP brief". It's POL00190092.

4 The Board had to have a line on historic
5 prosecutions. Do you remember that this morning: that
6 you needed to have a line on historic prosecutions?
7 That, again, is connected to Gareth Jenkins because he
8 was the flawed expert who had failed to disclose bugs,
9 errors and defects; you must accept that?

10 A. I'm afraid I didn't follow all of that. Can you break
11 that down: which specific document and point in time are
12 we referring to? I'm afraid --

13 **SIR WYN WILLIAMS:** Well, I think Mr Henry is right in the
14 sense we did go through that this morning, so I don't
15 think I need to have it again, Mr Henry.

16 **MR HENRY:** Right. Certainly, sir.

17 You knew, because you drafted the briefing for Paula
18 Vennells, that Gareth Jenkins had given evidence against
19 Seema Misra; you must accept that?

20 A. I saw that, that witness statement which Lesley Sewell
21 forwarded, yes.

22 Q. Also you actually drafted it, as well, on 1 July for --
23 forgive me, no need to take you to it -- POL00113367.
24 It's a document you've seen but at page 1 of 13 you
25 raise the issue of James Arbuthnot perhaps reviving

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1 historic prosecutions, and at page 5 of 13 you raise the
 2 issue that Gareth Jenkins had given evidence against
 3 Seema Misra.
 4 **A.** I'm sorry, I don't --
 5 **Q.** You don't --
 6 **A.** I don't recognise that, sorry.
 7 **Q.** Let's quickly go to that document, then. POL00113367.
 8 **A.** This isn't a document I produced.
 9 **Q.** But you certainly saw it?
 10 **A.** I saw it, yes.
 11 **Q.** Yes, and you read it?
 12 **A.** I believe so, yes.
 13 **Q.** Let's scroll up, please, on page 1. Do you see
 14 paragraph 8?
 15 **A.** Yes.
 16 **Q.** Clear risk identified.
 17 Could we go to page 5, please. We can see
 18 paragraph 30:
 19 "The Falkirk Anomaly", et cetera, et cetera.
 20 (b):
 21 "The prosecution expert (Gareth Jenkins from
 22 Fujitsu)", et cetera, et cetera.
 23 So what I'm trying to establish, through you, is
 24 that both your state of mind and Paula Vennells' state
 25 of mind is that Gareth Jenkins was the expert and Gareth
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1 **SIR WYN WILLIAMS:** Yeah, fine.
 2 While we're waiting for the next set of questions,
 3 can I ask you, Mr Edwards, in the email of October when
 4 Ms Vennells told Ms Perkins that you were briefed if she
 5 needed any more information, nobody has asked you the
 6 direct question but, just in case: did Ms Perkins ask
 7 you any questions or ask you to explain anything further
 8 following that email?
 9 **A.** No, sir. I don't recall any follow-up from Alice
 10 Perkins.
 11 **SIR WYN WILLIAMS:** Right. Fine. Thanks.
 12 Yes, who's next?
 13 **MR BLAKE:** It's Ms Watt.
 14 **MS WATT:** Thank you, sir.
 15 **Questioned by MS WATT**
 16 **MS WATT:** Good afternoon, Mr Edwards. I ask questions on
 17 behalf of the NFSP.
 18 I think it's fair to say that there are few
 19 survivors at the Post Office today from what we might
 20 term the "Paula Vennells era", and I think you and
 21 Rodric Williams are among the main ones; is that
 22 correct?
 23 **A.** I'm one of the few people from that era, yes.
 24 **Q.** You're currently the Network Strategy and Delivery
 25 Director and you advised Mr Blake this morning that this
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1 Jenkins had given evidence against Seema Misra.
 2 **A.** I think, yes, that's evident from this.
 3 **Q.** And that you, therefore, both of you, were aware of that
 4 at the time of the conversation on 21 October 2013,
 5 which was about a week after the Altman General Review.
 6 You were both aware of the significance of the unsafe
 7 witness in relation to not five cases, but that one
 8 specific case concerning Seema Misra.
 9 **A.** Candidly, I don't recall drawing a specific link back to
 10 this document, which I saw four or five months earlier.
 11 **SIR WYN WILLIAMS:** Is that it, Mr Henry?
 12 **MR HENRY:** That's it, sir.
 13 **SIR WYN WILLIAMS:** Thank you.
 14 Before we get the next one, could you just,
 15 Mr Henry, confirm the reference you gave for the note of
 16 the meeting which is described at paragraph 13 of the
 17 witness statement? I wasn't sure whether I got it down
 18 accurately.
 19 **MR HENRY:** Certainly, sir. Do you want me to give it to you
 20 now?
 21 **SIR WYN WILLIAMS:** Yes, I'll read it to you. It's
 22 POL00295635, is what I've written.
 23 **MR HENRY:** That's correct, sir.
 24 **SIR WYN WILLIAMS:** That's correct. Fine.
 25 **MR HENRY:** Thank you so much, sir.
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1 involves working with the Subpostmaster Network; is that
 2 correct?
 3 **A.** Yes.
 4 **Q.** I think it's the case that you currently have a senior
 5 role in a wide range of business decisions that affect
 6 subpostmasters, broadly including things such as, for
 7 instance, the number of sub post office branches in the
 8 network, the number of subpostmasters in the network,
 9 financial packages, decisions on closure of branches,
 10 compensation in the Hard to Place scheme, and generally
 11 just a great deal of what affects postmasters today;
 12 would that be fair?
 13 **A.** Yes.
 14 **Q.** So thinking about that, taking account of that, and
 15 given the evidence that we've heard from you today about
 16 your knowledge and role in working with the former Chief
 17 Executive, Paula Vennells, and Horizon-related issues,
 18 including some things that we saw, comments you had
 19 made, such as "making sure subpostmasters don't get off
 20 scot-free" -- in other words, escape deserved punishment
 21 and suchlike -- would you accept that it is -- should be
 22 and can be -- a significant concern to the subpostmaster
 23 network of today, and those representing them, that you
 24 should be in a role now that affects their working and
 25 financial relationships?
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1 A. I think that is a question for others to judge. As
2 I mentioned in my evidence earlier, I fully accept I was
3 caught up in part of the groupthink back in 2013 and
4 I didn't -- I don't believe I provided enough challenge,
5 I didn't step outside of the mindset at the time, and
6 I deeply regret that. I think I have learnt a huge
7 amount from that and I think I am still able to do
8 a good job for the business and for postmasters but it's
9 ultimately for others to judge that question.

10 MS WATT: Thank you.

11 SIR WYN WILLIAMS: Thank you, Ms Watt.
12 Is it Mr Moloney now?

13 MR BLAKE: It is, yes.

14 **Questioned by MR MOLONEY**

15 MR MOLONEY: Mr Edwards, I simply want to ask you very
16 briefly about Project Zebra and the Deloitte report.

17 A. Yes.

18 Q. In 2013/2014 you were aware that there was an issue
19 around remote access?

20 A. Yes.

21 Q. Yeah, and the Deloitte report for Project Zebra was
22 delivered in mid-2014?

23 A. Yes.

24 Q. Did you read that report, Mr Edwards?

25 A. I didn't, no.

1 Q. Did you read the Board's summary?

2 A. No. All I recall reading on this -- I wasn't
3 particularly closely involved with the matters at this
4 point. So I recall reading a summary email from Chris
5 Aujard to the Board but I didn't read the report itself.

6 Q. Did you discuss the findings of the report with
7 Mrs Vennells?

8 A. No, I was very -- I wasn't closely involved with matters
9 at this time.

10 MR MOLONEY: Thank you very much, Mr Edwards.

11 SIR WYN WILLIAMS: Is that it, Mr Blake?

12 MR BLAKE: That is, yes, sir.

13 SIR WYN WILLIAMS: Well, thank you, Mr Edwards, for making
14 your witness statement and for giving evidence orally
15 before me today. I'm grateful to you.

16 THE WITNESS: Thank you.

17 SIR WYN WILLIAMS: Right. Two days next week, starting on
18 Monday, Mr Blake?

19 MR BLAKE: That's correct.

20 SIR WYN WILLIAMS: All right, 9.45. It's one witness on
21 Monday. I take it we still want to start at 9.45, do
22 we?

23 MR BLAKE: Yes. Thank you, sir.

24 SIR WYN WILLIAMS: Fine. All right.

25 (3.50 pm)

1 (The hearing adjourned until 9.45 am
2 on Monday, 29 July 2024)
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