

Witness Name: Andrew Holt

Statement No: WITN11040100

Dated: 12 November 2024

POST OFFICE HORIZON IT INQUIRY

FIRST WITNESS STATEMENT OF ANDREW HOLT

I, Andrew Holt, will say as follows.

INTRODUCTION

1. I am a former employee of Post Office Limited (POL).
2. This witness statement is made to assist the Post Office Horizon IT Inquiry (the "Inquiry") with the matters set out in the Rule 9 Request addressed to me and dated 7 October 2024 (the "Request").
3. I have received the assistance of Ashfords LLP in drafting this statement.

PROFESSIONAL BACKGROUND

4. I have considered the following documents:

- i. **[POL00193406]** (email from Simon Baker regarding his handover, dated 13/08/2013);
 - ii. **[POL00193604]** (email regarding POL training day, dated 16/08/2013);
 - iii. **[POL00197019]** at page 2 (presentation on roles/ responsibilities for POL officers in relation to the Mediation Scheme, dated 08/11/2013).
5. In 1995 I achieved a Masters in Information Technology and Management from Coventry University.
6. Following my masters, between 1995 and 2009 I progressed through various IT related positions in different organisations (including Technology Services, Banking and Financial Services) carrying out a variety of roles from coding, systems analysis and management, business analysis, as well as project and programme management roles. Several of these roles were for less than a year. My main roles during this time were the following:
 - i. Systems Analyst, Systems Manager & Project Manager for an Investment Bank –1996 to 2003
 - ii. Business Solutions Manager for a Financial Services company – 2005 to 2007
7. I joined the POL IT function as a Business Solutions Manager on 5 May 2009. In this position I was aligned to the financial services business function within POL. My role was to help POL financial services to define, initiate and get approval for IT projects that would deliver new features to their various IT systems.

8. I was promoted to an IT Business Relationship Manger within POL on 1 January 2011, and held this job title until 31 March 2014. In this role I was responsible for leading a team of 4 other IT Business Relationship Mangers, and I was their point of contact for supervision and line management. However, I also worked alongside them and together we managed IT relationships with management staff across various business units within POL. We predominantly worked with these Stakeholders to align their strategic business plans with the IT functions. This was achieved by collaborating with IT architects, and ensuring each business area's strategy aligned with IT's overall objectives. We also assisted departments within POL getting IT projects initiated and progressed, providing oversight over the projects whilst they were being delivered.
9. From 1 April 2014, POL changed my job title to Business Relationship Lead. As far as I can recall, this change was simply made to distinguish that I was, and had been since 1 January 2011, the group lead of the 4 other Business Relationship Managers. As such, this change in title did not represent a change in the role itself and I was still carrying out the same functions set out in paragraph 8 above.
10. It should be noted that from August 2013 I also took on a part-time project management role within POL's Project Sparrow. Project Sparrow was specifically related to the work of the Initial Complaint and Mediation Scheme (the Mediation Scheme) and the work of the Working Group for the Mediation Scheme (the Working Group). I was also a point of contact into Fujitsu and the IT leadership Team where further actions or engagement was needed. This was not a job change or promotion, but rather an additional responsibility to my main day to day job described in paragraph 8 above. I do not remember how many hours a week I spent working on Project Sparrow matters, but from my recollection it was ad hoc and varied depending on what was required from the programme. I provide further detail in relation to my role in Project Sparrow later in this statement.

11. I left POL on 31 December 2014 and have worked in several different organisations in IT roles since. Initially I continued in IT Business Relationship roles, then IT Portfolio Management, IT Service Management, and I am now an IT Consultant.

KNOWLEDGE OF HORIZON AND HORIZON INTEGRITY

12. I confirm that I have considered the following documents:

- i. **[POL00105609]** (Email chain from Antonio Jamasb to Dave Hulbert re Horizon - whole network service outage dated 09/07/2012);
- ii. **[POL00182875]** (My email Andrea Harwood, Matt Sadler and others regarding Horizon issues, dated 25/10/2012);
- iii. **[POL00192699]** (Email chain from Simon Baker to Angela Van-Den-Bogerd et al regarding stock adjustment issue and response, dated 02/07/2013);
- iv. **[POL00145546]** (Email from Steve Beddoe regarding call about Horizon improvements, dated 18/07/2013);
- v. **[POL00297788]** (Horizon Investigation plan, dated 19/07/2013);
- vi. **[POL00060722]** (Email from Alwen Lyons to Simon Baker regarding transaction corrections, dated 19/07/2013);
- vii. **[POL00297905]** (Email chain from Rod Ismay to Simon Baker regarding Horizon stock adjustments, dated 23/07/2013);
- viii. **[POL00297984]** (Email from Ron Warmington to Simon Barker regarding Second Sight investigation into branch shortfalls, dated 26/07/2013);

- ix. **[POL00193030]** and **[POL00193031]** (Email regarding Branch Support Programme with attached Terms of Reference, dated 31/07/2013);
- x. **[POL00413701]** (Email from Simon Baker to Lesley J Sewell with me cc'd, regarding Nick Wallis post on possible Horizon replacement, dated 16/08/2013);
- xi. **[POL00145915]** (Email chain from Mark R Davies to me regarding Horizon National Media Enquiries, dated 16/08/2013);
- xii. **[POL00298276]** (Email from Ruth Barker copying me regarding Horizon media enquiries, dated 16/08/2013);
- xiii. **[POL00298403]** (Email from Susan Crichton to Angela Van-Den-Bogerd, with me cc'd, regarding Horizon review workflow, dated 19/08/2013); and
- xiv. **[POL00344252]** (My email to Lesley Sewell regarding Horizon Core Audit Process, dated 30/01/2014).

13. As far as I can recall, I had no previous knowledge of the Horizon IT system when I first joined POL in 2009. I also do not remember if I had any specific training on the system after I joined POL, but rather I learned organically about it as I progressed through my roles.

14. During my roles in POL, my knowledge of the Horizon IT system was generally only required for strategic and project planning. In my roles I would have worked on requesting new features and functionality on the platform via Fujitsu, and these would have been to introduce new products or improve certain aspects of its capabilities or functionality for different business units within POL. To do this I

would have had some general knowledge of the system's functions and capabilities, to understand what changes Fujitsu needed to design and deliver.

15. Nevertheless, I did also gain some knowledge on the practical operation of the Horizon IT system. For example, I recall working on one project that related to improving the flow of a certain transaction on the Horizon terminal. Although I cannot recall what this transaction was, I do remember visiting a Post Office and getting a Sub-postmaster (SPM) to show me how that transaction flow worked on his screen. I also helped out annually in Post Office branches at Christmas time (all staff could volunteer for this), and would have observed SPMs using the Horizon IT system then.
16. I cannot recall having specific knowledge of potential Bugs Errors and Defects (BEDs) in the Horizon IT system in my first few years in POL. Fujitsu provided day to day service management of Horizon, and reported into another team in POL IT. I can see from the disclosure provided to me that I am involved in part of the email chains on 9 July 2012 **[POL00105609]** and 25 October 2012 **[POL00182875]**, that detail some Horizon related service issues, but I do not recall service issues like this being a major cause for concern.
17. From reviewing the documents provided to me, I believe it is likely that I first became more aware of potential BEDs and their impact on the Horizon IT system during my handover period with Simon Baker between July 2013 and mid-August 2013, when I took on additional responsibilities within POL's Project Sparrow. Whilst I cannot specifically recall reading it, I would have read Second Sight's Interim Report on alleged problems with the Horizon system **[POL00099063]** in preparation for my role within Project Sparrow. Having re-read this interim report, I can see that Second Sight were aware of 2 incidents where defects or bugs in the Horizon software gave rise to 76 branches being affected by incorrect balances or transactions.

18. Although I would have read the findings in Second Sight's interim report, I do not recall having any concerns about a lack of integrity in the Horizon IT system. From my experience, all IT systems have day to day incidents which require resolution, with further root cause investigation should these cause major issues or there are recurring themes. It appears that Second Sight explored these 2 BEDs in their interim report and concluded that no systemic problems were uncovered during their review. Although I cannot recall my thoughts from the time, I believe that I would have simply taken Second Sight's conclusions as explained and not thought to scrutinize matters any further, especially given that they were specialist forensic investigators engaged on an independent basis. As a consequence, I do not think that I would have taken this report and the issues identified to indicate that there were any broader integrity problems in the Horizon Software.
19. I do not believe I had awareness of any specific complaints from SPMs addressing BEDs or concerns with Horizon Integrity until I was asked to progress Horizon related queries arising out of the work in Project Sparrow related to Second Sight and the Mediation Scheme. Further detail of my involvement in this work is set below under the following section of this statement: '*Second Sight and the Working Group dealing with Mediation*'.
20. I was not involved in or responsible for providing training on the Horizon IT system to SPMs and I do not remember how this training was delivered. In light of this, I am not able to comment on the adequacy of such training.
21. In terms of the Branch Support Programme, I understood this was set up in response to concerns in Second Sight's Interim report about the adequacy of training support provided to POL branches on the Horizon IT system. I have seen an email from Gayle Peacock [POL00193030] where myself and others were invited to a kick-off meeting regarding the Branch Support Programme and were

asked to comment on the Programme's draft terms of reference ahead of this. I do not remember if I attended that meeting or commented on the draft terms of reference, but as far as I can recall I had no active role in running the Branch Support Programme. I do have a vague recollection of assisting Angela Van-Den-Bogerd and Gayle Peacock with pulling together a high level document explaining the purpose and goals for the programme, but I was not involved in deciding the detail of how the programme would be delivered, and I do not think I was involved in steering it. I believe that The Branch Support Programme became a separate initiative to the work of Project Sparrow.

HELEN ROSE REPORT

22. I have considered the following documents:

- i. **[POL00022598]** (Horizon Data Lepton SPSO 191320 by Helen Rose ('Helen Rose Report') dated 12/06/2013);
- ii. **[POL00202688]** (my email to Belinda Crowe and Andrew Parsons regarding Helen Rose report and criminal cases, dated 08/04/2014); and
- iii. **[POL00303963]** (Email to me from Rod Ismay regarding the Helen Rose Report, dated 23/04/2014).

23. Prior to considering the above documents, I had no memory of the Helen Rose report. I can see that the report is dated 12 June 2013, but it appears from the emails at **[POL00202688]** and **[POL00303963]** that the first time I was made aware of it was in April 2014.

24. I do not know why the Helen Rose report was produced or who may have commissioned it. I did not know Helen Rose and I am not aware of her specific role,

but from the documents presented to me it appears that she worked within POL's security and fraud department. In light of this, I can only speculate that she may have come across the issue explored in her report during her day to day role and produced the document as part of her investigative work.

25. I can see from my email at **[POL00202688]** that after I learned about the Helen Rose Report I investigated the required actions arising out of it (namely in relation to submitting the change request set out in the report's recommendations), and put steps in place for this matter to be progressed. My email suggests that I considered the issues raised to relate to the Branch Support Programme and I arranged with Angela Van-Den-Bogerd and Gayle Peacock to take matters forward as part of this work. I do not recall having further involvement with the Helen Rose report beyond this.
26. I cannot recall what my initial response was after reading the Helen Rose report, nor can I recall what the response or reaction was within POL. I also do not recollect ever considering whether the points raised within the Helen Rose report casted doubt on the safety of the convictions of SPMs, and I am not sure now whether I understood at the time of reviewing the report that prosecutions were based wholly or partly on Horizon data. From reading the report now, I think Helen Rose's conclusions would have probably led me to believe that the issues explored in the report related to an isolated event, that would benefit implementing the change request she recommended.
27. I do not remember or think I know who the Helen Rose Report was distributed to, nor do I know any details of the nature and extent of the knowledge of the Helen Rose Report within POL. Having reviewed **[POL00303963]**, it appears that I had to obtain a copy of the report from Rod Ismay, but I am not sure who else had access to it.

SECOND SIGHT AND THE WORKING GROUP DEALING WITH MEDIATION

28. I have considered the following documents:

- i. **[POL00029666]** (POL Spreadsheet of Second Sight Workstreams);
- ii. **[POL00134525]** (POL PowerPoint detailing Second Sight Mediation Process);
- iii. **[POL00099265]** (Email chain regarding mediation cases, dated 17/07/2013);
- iv. **[POL00192267]** (Email from Simon Baker to Second Sight, identifying me as his replacement, dated 18/07/2013);
- v. **[POL00297788]** (Horizon Investigation Level 1 plan);
- vi. **[POL00192335]** and **[POL00297804]** (Email chains regarding briefing note for Paula Vennells/James Arbuthnot meeting, dated 19/07/2013); also **[POL00117036]** (Email from Simon Baker with notes from said meeting);
- vii. **[POL00407565]** (Email from Gareth Jenkins to Simon Baker, me cc'd, regarding Stock adjustments, dated 22/07/2013);
- viii. **[POL00137330]** (Slide Pack for SPM Improvements & Mediations Weekly Steering Group, dated 26/07/2013);
- ix. **[POL00162011]** (Email from Sophie Bialaszewski to me regarding the Horizon Investigation Level 1 plan, dated 13/08/2013);

- x. **[POL00413697]** (Email from Kay Linell to me regarding the Working Party, dated 14/08/2013);
- xi. **[POL00417109]** (Report and Agenda for SPM Improvements & Mediations Weekly Steering Group, dated 15/08/2013);
- xii. **[POL00298382]** (Email from Alan Bates to Simon Baker, me cc'd, with comments on Phase 1 Pack, dated 18/08/2013);
- xiii. **[POL00298419]** (Email from Rodric Williams to Lesley Sewell, me cc'd, regarding Draft Letter to Fujitsu, dated 20/08/2013);
- xiv. **[POL00298446]** (Email from Sophie Bialaszewski to me regarding 'MP Handling Plan', dated 22/08/2013);
- xv. **[POL00146190]** (My email regarding Working Party Dial-in for Training Day, dated 29/08/2013);
- xvi. **[FUJ00235737]** (Fujitsu email chain regarding POL Mediation Process for Sub-Post Masters and my role, dated 02/09/2013);
- xvii. **[POL00139864]** (Email from Martin Smith to me regarding POL Weekly Update, dated 06/09/2013);
- xviii. **[POL00327060]** (Email from Laura Pinkney to me regarding Weekly update, dated 13/09/2013);
- xix. **[POL00299609]** (Email from Alan Bates to Paula Vennells and me (et al) regarding the Martin Griffiths case, dated 23/09/2013);

- xx. **[POL00116135]** (Email from Martin Edwards to me concerning meeting with Sir Anthony Hooper, dated 27/09/2013);
- xxi. **[POL00372534]** (Email chain from Andrew Parsons to me regarding Working Group and criminal investigations, dated 16/10/2013);
- xxii. **[POL00123003]** (Email from Andrew Parsons to me regarding Project Sparrow, dated 21/10/2013);
- xxiii. **[POL00197019]** (presentation on roles/ responsibilities for POL officers in relation to the Mediation Scheme, dated 08/11/2013);
- xxiv. **[POL00301456]** and **[POL00199985]** (Emails from me to Angela Van-Den-Bogerd with technical mediation scheme application questions, dated 23/01/2014 and 24/01/2014 respectively); and
- xxv. **[FUJ00239552]** (Email from me to Pete Newsome regarding reaction to Second Sight Report, dated 03/03/2014).

29. I have been asked to describe the nature of any briefing I received from Simon Baker upon replacing him in the role of 'Senior Business Relationship Manager' in August 2013, particularly in relation to:

- i. Second Sight, including the quality of their work;
- ii. the nature and purpose of the Mediation Scheme, including POL's goal regarding the same; and
- iii. the Working Group.

30. I would firstly like to clarify that as far as I can recall, Simon Baker was not a 'Senior Business Relationship Manager' in POL. I can see from the documents provided to me that his emails were signed off with 'Head of Business Change and Assurance.'
31. I would also like to note that the role I took over from Simon Baker in August 2013 did not lead to me changing job title or being promoted to become a Senior Business Relationship Manager, or Head of Business Change and Assurance. As explained earlier in this statement, I was taking on Simon Baker's responsibilities within Project Sparrow on a part time basis, and these responsibilities were separate to my main day to day role as a Business Relationship Manager in POL.
32. I believe that I received a gradual handover from Simon Baker from around July 2013 to mid-August 2013 in the run up to me taking over his role in Project Sparrow. Simon Baker and I would have no doubt had 1-1 meetings during this period, but due to the passage of time I cannot specifically recall when these meetings were, or what exactly was discussed.
33. In terms of any handover that I received in relation to Second Sight, including the quality of their work, I do not remember the conversations I may have had with Simon Baker or anyone else about this. However I do believe I would have been informed about the purpose of Second Sight's role as part of me joining Project Sparrow.
34. I cannot clearly remember what I understood Second Sight's role to be, but from reviewing the documents provided to me, including the reports completed by Second Sight, I believe upon joining Project Sparrow that I would have understood that Second Sight had initially been engaged with a wide remit to look into alleged problems with the Horizon System, and this appears to have led to them producing their interim report. It is then clear from the documents that their role later became more focused on reviewing and investigating applicant's complaints in the Mediation Scheme, which appears to have led to them producing their Part 1 and

Part 2 Initial Complaint review and Mediation Report. I do not remember when I would have first become aware of this proposed role change.

35. I do not recall having views or concerns about the approach taken by Second Sight in any of the work they were doing in connection with Project Sparrow. Based on the documents provided to me and the timing of Second Sight's initial engagement, I do not think I would have been involved in any discussions about Second Sight's initial investigation scope.
36. I also believe that I would have received a handover from Simon Baker regarding the nature and purpose of the Mediation Scheme, including POL's goal regarding the same, however again, I cannot recall the specific detail of this handover. I think it is very likely it would have been explained to me that a scheme was being set up as part of POL's public commitments (which I can see are set out on slide one of the PowerPoint at **[POL00197019]**) and that it would entail a process by which SPMs could raise outstanding grievances with POL. When I joined Project Sparrow, I believe there were different options and arrangements being considered by the Working Group for how the Scheme would run, although I cannot recall what these options were. I can see that the process that was eventually agreed is set out in an internal Fujitsu email chain dated 2 September 2013 **[FUJ00235737]**, which indicates that I spoke with Fujitsu to update them on what the agreed process for the Mediation Scheme would be. I can also see there was a process flow defined in **[POL00134525]**.
37. I would have also received a handover from Simon Baker in relation to the Working Group for the Mediation Scheme, but again I cannot recall the details of this. Nevertheless, I believe that it would have been explained to me when I first joined Project Sparrow that the Working Group was being formed to first agree the scope of the Mediation Scheme and then once that was agreed, to help manage the planning and processes around it as it ran. From memory I believe the Working

Group consisted of POL members, Second Sight Members, JFSA members and an independent Chair.

38. I cannot recall if my line manager, anyone within POL's senior management, or anyone of the POL Board, set out their views to me on the matters contained paragraph 29(i)–(iii) above. However, I do have a vague recollection about the aim to reduce the amount of money spent on Second Sight, but I do not remember specifically where or when this was discussed. I can see that the disclosed document [POL00197019] alludes to this point. I do not think I would have had any discussions with the Board members or attended ExCo meetings.

39. I have also been asked to describe my experience of the operation of the Working Group, to include the following matters:

- i. the nature and extent of my engagement with Second Sight;
- ii. the nature and extent of my engagement with Fujitsu;
- iii. the nature and extent of my engagement with POL external legal advisers;
and
- iv. the nature and extent of my engagement with Mark Davies and Martin Edwards in respect of POL responding to media reporting regarding issues with Horizon, the Scheme, and any criticism brought against the Horizon system and POL.

40. I do not remember the precise details of my role and involvement with the Working Group when I took over from Simon Baker in August 2013, but I believe it entailed me being a Secretariat to the group, helping to organise Working Group meetings, and being point of contact to manage actions arising out of such meetings, particularly in relation to matters or queries that needed progressing with Fujitsu or

POL IT. My recollection is that my involvement with the Working Group was during the very early stages where the focus of the group was to agree the scope of the Mediation Scheme, set out how it would run and get the process up and running. Later in 2013 when Belinda Crowe joined Project Sparrow, I believe my role changed and I no longer attended the Working Group. I believe Belinda Crowe came on board to manage Project Sparrow and the Mediation Scheme and also became the Secretariat for the Working Group. Sir Anthony Hooper was also appointed as the Working Group Chair. After this point I became increasingly less involved in the Working Group and I believe I dropped out of it altogether, although I cannot recall exactly when. However I do recall that after I dropped out of the Working Group my role within Project Sparrow became more focused on progressing IT or Fujitsu requests that arose.

41. My engagement with Second Sight was usually through the Working Group, but on occasion I did correspond directly with them to update on action points, particularly where they were seeking further engagement with Fujitsu or other technology providers. I was effectively a point of contact within Project Sparrow that could facilitate and coordinate such requests.
42. In terms of my engagement with Fujitsu, I would liaise with them in various circumstances, for example, when POL needed their input on comms responses, where specific technical queries in relation to the Horizon IT system had been raised, and to provide general progress updates on the Mediation Scheme.
43. I cannot clearly recall the nature and extent of my engagement with POL external legal advisers including Bond Dickinson, Womble Bond Dickinson and Cartwright King. However, having reviewed the documents provided to me, I can see there is email correspondence between myself and Andrew Parsons of Bond Dickinson at **[POL00372534]** and **[POL00123003]** from 16 and 21 October 2013 respectively, during which the Mediation Scheme was in the process of being set up. It is clear

from these emails that I was involved in liaising with Bond Dickinson to help coordinate the setting up of the Mediation Scheme and seek their legal support and expertise in responding to queries or concerns related to the same. In terms of any engagement that I had with Cartwright King, I believe that they approached me to seek IT input or clarification or gain further information from Fujitsu on technical matters. I would have either responded, or passed on these queries and coordinated responses between POL IT and Fujitsu teams.

44. I cannot recall having much engagement with Martin Edwards during my time within POL, however, having read **[POL00116135]** I can see that I updated him on overall progress in relation to the Mediation Scheme, so that he could provide this information to Paula Vennells.

45. In terms of my engagement with Mark Davies, I vaguely recall that I worked with his team on understanding the Comms plan they were putting together in relation to the Mediation Scheme. The milestone plan for this appears in **[POL00417109]**. I also remember and can see from the documents provided that I assisted the Comms team by liaising with Fujitsu or POL IT, whenever there were any specific Comms content that needed their input due to its technical nature.

REMOTE ACCESS TO HORIZON

46. I have considered the following documents:

- i. **[POL00195750]** (Email from Ian Henderson to me regarding Bracknell testing team's access to back-office accounting systems, dated 25/09/2013);
- ii. **[POL00220859]** (Email from Belinda Crowe to me regarding Martin Rolfe's emails, dated 13/03/2013); also the chaser email **[POL00148887]** (dated 27/08/2014);

- iii. **[POL00367583]** (Email from Angela Van-Den-Boger to me regarding POL access to audit servers, dated 01/05/2013);
- iv. **[POL00091394]** (Email from Melanie Corfield to me regarding Second Sight's M053 Revised Draft CRR-referring to remote access, dated 13/10/2013); and
- v. **[POL00211254]** (Email from Andrew Parsons to Rodric Williams regarding note on Horizon remote access process, dated 21/10/2014) and **[POL00349653]** (updated version of note, dated 04/11/2014).

47. Whilst I recall the topic of remote access, I cannot recall what the nature and extent of my knowledge of this was. Having reviewed the documents provided to me, my understanding would have been the same as set out in paragraph 3 of Melanie Corfield's email at **[POL00091394]** – that there was no remote access for individual branch transactions, but that Fujitsu had support access, controlled with security processes in place, to the 'back-end' of the system for software updates and maintenance. All IT systems have an Administrator in place with the ability to access a system in this way, so it would have been logical for someone in Fujitsu to have access for this purpose.

48. As far as I can recall, I do not think I ever thought or suspected that Fujitsu had remote access to insert, edit or delete transaction data or data in branch accounts without appropriate process or the knowledge or consent of SPMs.

49. I think this matter had already been investigated before I became involved in Project Sparrow in August 2013, and it had been determined this could not be done by Fujitsu. I also note in the email chain at **[POL00195750]**, Simon Baker confirmed to Second Sight on 3 July 2013 that there was no ability for POL employees who

occasionally worked at the Fujitsu offices in Bracknell to posit transactions to the back-office accounting systems either.

50. I do not think I carried out or requested any further investigations to determine if Fujitsu or POL employees working at Bracknell had the ability to insert, edit or delete transaction data or data in branch accounts without the knowledge or consent of SPMs, but I can see from the documents provided to me that I was asked by Second Sight to assist them in obtaining email archives from back-up tapes as at 31 December 2008 for the POL employees who worked on the Bracknell testing team (see **[POL00195750]**). I do not know if I did assist with obtaining this data in respect of all individuals, but the email chain at **[POL00220859]** illustrates that I did try and progress this request with CSC in respect of one of the individuals listed for all 2008 sent and received emails. Unfortunately I do not recall what came of this request, but from the email chain at **[POL00148887]**, it appears a further explanation was being sought from Second Sight as to why this information was required, due to the time and effort it would entail.

51. I believe that any knowledge I did have around the topic of remote access would have been gained from queries being raised about it in correspondence that I was sent or copied in to, such as the emails noted in paragraph 46(i) – (v) of this statement.

SECOND SIGHT INTERIM REPORT JULY 2013

52. I have considered the Second Sight Interim Report dated 8 July 2013 **[POL00099063]**.

53. I do not believe I had any involvement in the preparation of the Second Sight interim report. I believe that the report would have been prepared solely by Second Sight.

54. I cannot recall if I provided Second Sight with any information to help them to produce their interim report, but given that the report was produced prior to me officially taking over from Simon Baker in Project Sparrow in August 2013, I believe it is unlikely that I did.
55. I believe that the first time I would have become aware of the bugs noted in Second Sight's interim report is when I read the report. I cannot recall when I read it but as stated in paragraph 17 above, I expect this would have been during my handover period with Simon Baker.
56. I do not believe I passed any information to POL's Board or ExCo regarding the bugs raised in Second Sight's interim report. First, as noted earlier in this statement, I had not officially begun my role in Project Sparrow when the interim report was published so it is unlikely I carried out any actions in relation to it, and second, as far as I can recall, it would have been the more senior participants of Project Sparrow who would inform the Board or ExCo on any matters that arose. As previously mentioned above, I was often a point of contact into Fujitsu or POL IT in relation to matters or queries arising out of Project Sparrow, but I do not think I was ever a liaison to POL's Board or to ExCo. I cannot recall if I saw anyone else pass information about the bugs mentioned in Second Sight's interim report to POL's Board or to ExCo.
57. I cannot remember what steps, if any, I took after Second Sight's interim report. I believe it is likely there would have been meetings held within POL about the report, and potentially with Second Sight and Fujitsu too. It is possible that I may have been asked to set up or attend these meetings, but I simply cannot remember.

POL STEERING GROUP AND FURTHER INVESTIGATIONS INTO HORIZON INTEGRITY

58. I have considered the following documents:

- i. **[POL00116179]** (Email from Sarah Paddison to me regarding Project Sparrow steering group, dated 08/10/2013);
- ii. **[POL00146704]** (My email to Alwen Lyons concerning Project Sparrow update, dated 23/10/2013);
- iii. **[POL00196926]** (Project Sparrow Overview Document, dated 31/10/2013);
- iv. **[POL00139000]** (Sparrow Steering Group meeting minutes, dated 05/11/2013); and
- v. **[POL00158093]** (Email from Belinda Crowe to me regarding scope and resources for Project Sparrow, dated 14/11/2013).

59. I have been asked to describe my experience of the operation of the “POL Steering Group Working Group (Sub- Postmaster Improvements and Mediations Steering Group).” I do not recall being involved in any group with that title, but for the purpose of addressing this question I have assumed this refers to the Project Sparrow Steering Group (the Steering Group), as opposed to the Working Group for the Mediation Scheme.

60. As far as I can recall, the Steering Group was formed to steer POL’s 3 public commitments set out on slide one of the PowerPoint at **[POL00197019]**.

61. In terms of my role on the Steering Group, I assisted in setting up group meetings, helped to drive any actions from such meetings, pulled together information packs, plans and progress reports for the Steering Group by liaising with relevant people across POL, and I was also a point of contact for questions and requests arising out of the Steering Group that needed to be raised with POL IT and Fujitsu.

62. Unfortunately I cannot recall any specific examples, but where matters arose from the Steering Group that required engagement with Fujitsu, I believe I would have been the point of contact with Fujitsu on most occasions. I also believe if something arose from the Steering Group which I felt was relevant and necessary to share with Fujitsu, I would have done so.

63. I cannot recall what my personal engagement might have been with POL's external advisors in relation to matters arising from the Steering Group, but I know that they were engaged on some workstreams, for example, the setting up of the Working Group and Mediation Scheme. I can see from the documents provided to me that I am copied into correspondence from Andrew Parsons of Womble Bond Dickinson who was involved in the setting up the Mediation Scheme. I would have been copied into this for information purposes, and I may have also been asked help action matters or queries from Womble Bond Dickinson. Unfortunately I cannot recall any specific examples of this.

IMPERIAL COLLEGE LONDON

64. I have considered the following documents:

- i. **[POL00300571]** (Email from Rodric Williams to Michael Harvey regarding instruction of experts on the Horizon System, dated 06/11/2013);

- ii. **[POL00199809]** (Email from Jarnail Singh to Chris Aujard, with me cc'd, regarding appointment of independent Horizon expert, dated 16/01/2014);
- iii. **[POL00148693]** (My email to Jarnail Singh and Andrew Parsons regarding ICL expert report, dated 10/07/2014);
- iv. **[FUJ00236423]** (Email from James Davidson to Bell Gavin regarding ICL initial review and requests, dated 23/07/2013);
- v. **[FUJ00238073]** (Fujitsu report on Horizon integrity by James Davison, dated 14/08/2014);
- vi. **[POL00348522]** (My email to Neil Wilkinson, Lesley J Sewell, Dave Hulbert and others regarding meeting with ICL experts, dated 22/08/2014); and
- vii. **[POL00148950]** (Email from Jarnail Singh to Andrew Pheasant, Jessica Madron, cc'ing Andrew Parsons and others regarding CK Draft Instructions to Expert, dated 05/09/2013); and **[POL00325918]** (same email chain, latest reply dated 01/01/2014)

65. I could not initially recall why the experts from Imperial College London (ICL) were instructed by POL. From my review of the documents provided, I now remember that they were instructed to assess and report on certain aspects of the Horizon IT System from an assurance perspective, and I believe the reasons for this were as set out in Jarnail Singh's email to Chris Aujard, with me cc'd **[POL00199809]**.

66. I have been asked to consider the following document from Cartwright King at **[POL00148749]**, which sets out their advice in relation to apparent concerns arising

out of the instructions to ICL. I can see that this advice note has a particular focus on an email from me where I state a need to *“agree how we steer this or define the requirement correctly so the scope doesn’t get out of control and we allow Imperial College to produce independent report.”* Until receiving this document from the Inquiry, I do not believe I had any awareness of its existence, or that legal advice had been sought on this matter.

67. I would first like to clarify that this sentence is worded poorly from me and should not be read as me suggesting that I did not want ICL to produce an independent report, nor should it be read as me looking to influence ICL or their work. On the contrary my recollection is that I was trying to ensure that the independent review would provide a meaningful independent report, and POL stakeholders understood what further steps and costs might be incurred. As far as I can remember the original ICL time and effort estimate was relatively small, and Horizon was a large complex system, so I wanted to make sure that there was an understanding that the review would either need to be on 1.) some specific elements of Horizon where ICL would have sufficient time to review all the detail necessary to provide conclusions or 2.) a broader review which would likely need follow on work by ICL, with additional cost. It was my view that if ICL could understand and assess the previous work, they could avoid repeating work that had already been conducted effectively. They would then be able to carry out a more detailed assessment within the original time and effort estimates, and in turn, produce a more meaningful report overall.

DELOITTE

68. I have considered the following documents:

- i. **[POL00264768]** (Email from Julie George to me regarding Deloitte and assurance work on Horizon, dated 03/04/2014)

- ii. **[POL00028062]** (Deloitte – Horizon Desktop Review of Assurance Sources and Key Control Features, Draft for Discussion, dated 23 May 2014);
- iii. **[POL00304662]** (My email to Dave M King and Rodric Williams and cc'd Jarnail Singh regarding documents to be sent to ICL, dated 23/05/2014); and
- iv. **[POL00148693]** (My email to Jarnail Singh and Andrew Parsons regarding sharing Deloitte report with ICL, dated 10/07/2014); and
- v. **[FUJ00241523]** (Fujitsu Mediation Update).

69. From my recollection, I do not think I had any involvement in driving the work relating to the Deloitte report at **[POL00028062]** and I do not know why Deloitte had been instructed to produce this report. I can see from the email chain at **[POL00264768]** that myself and Julie George were told about the Deloitte work on 2 April 2014 by Belinda Crowe, and I was informed that I did not need to speak with Fujitsu about this as Rod Williams and Lesley Sewell were going to. I also note from this email that Belinda asked Julie and I to provide her with relevant documents to go to Deloitte, but I cannot recall if I passed over any documentation for the purpose of this work. It appears from the documentation provided to me with the Request that Julie George was involved in progressing this work going forward.

70. I do not remember the name Project Zebra or who had responsibility for this project within POL. If the Deloitte work was referred to as Project Zebra, the documents provided to me suggest that Julie George may have been responsible for this project or had some involvement in progressing it.

71. I do not know the nature and extent of the knowledge and distribution of the Deloitte report within POL.

72. I cannot recall if I actually read the Deloitte report at the time or if I was just simply aware it existed. I can see in the email chain at **[POL00148693]** (which relates to an initial review provided by ICL and their request for further documentation) that I mention there being an overlap with the Deloitte and the ICL work. I also note that I suggest having a meeting to discuss and understand this further with Julie George. This may suggest that I did read the Deloitte report around that time, but I simply cannot recall for certain. If I did read it, I do not think I would have carried out any detailed analysis or review of it, given that as far as I am aware, I had no involvement in commissioning or progressing this piece of work.

73. As far as my recollection goes, I do not think I ever considered whether points raised within the Deloitte report casted doubt on the robustness of the Horizon system and reliance on Horizon data when pursuing SPMs and/or dealing with their claims in mediation. Reading the Deloitte report now I can see that it gives indications as to the effectiveness of the Horizon system and sets recommendations and actions, but again, I cannot say for certain if I even read this at the time.

74. I do not know what work was carried out within POL in response to the Deloitte Work.

SECOND SIGHT REPORT PART TWO: JULY/ AUGUST 2013

75. I have considered the following documents:

- i. **[POL00004439]** (Second Sight Initial Complaint review and Mediation Report, Part 1);

- ii. **[POL00022150]** (Second Sight Initial Complaint review and Mediation Report, Part 2);
- iii. **[POL00207734]** (Email from David Oliver to me regarding Second Sight Part Two report, dated 21/08/2014);
- iv. **[POL00207767]** (My email to Lesley J Sewell, Dave Hulbert, Neil Wilkinson regarding the Second Sight Part 2 report, dated 22/08/2014);
- v. **[POL00148952]** (Email from Belinda Crowe to Andrew Parsons and Rodric Williams, me cc'd, regarding BBC request for an interview following Second Sight Part 2 report, dated 05/09/2014); and
- vi. **[FUJ00175066]** (Email from Ian O'Driscoll to Michael Harvey cc'ing James Davidson, Pete Newsome and others regarding FOI request for a copy of Second Sight Part Two Report, dated 03/10/2014)

76. I cannot recall having any involvement with Second Sight in respect of the preparation of their Part 1 and Part 2 Initial Complaint review and Mediation Report. Given that part of my role in Project Sparrow involved being a point of contact into Fujitsu and POL IT to action queries and requests, it is possible that I may have assisted Second Sight with requests if they required information to complete their report, but I cannot say this for certain and the documents provided to me do not help me determine this.

77. Based on my recollection, I do not believe I would have had any involvement in briefing the POL Board and POL Communications team in relation to Second Sight's Part 2 Report. However, I can see from **[POL00207767]** that I must have

been tasked to inform POL's IT department, Lesley Sewell (CIO) and Fujitsu about the existence of the report and to provide a summary on what POL's position was in respect of it. The fact I did this is in keeping with my role within Project Sparrow, where I often acted as a point of contact into POL IT and Fujitsu. From reading this email now I believe that I would have drafted this summary having reached out to others within the Project Sparrow team to learn more about the situation, although I cannot recall who for certain.

78. I note from my email summary at **[POL00207767]** that POL did not agree with the content of Second Sight's Part 2 report and in light of this, POL's position was that it should not get sent out to applicants in the Mediation Scheme. I have no recollection if following my review of Second Sight's Part 2 Report, that I also personally disagreed with its content. Having re-read the Part 2 Report now I can see it deals with a lot of operational matters, which is not an area I would usually pick up or comment on.

79. Other than my actions set out in paragraph 77 above, I do not recall what other steps I may have taken following Second Sight's Part 2 report. I believe it is likely that there would have been internal meetings held within POL about the report, and perhaps meetings with Fujitsu and Second Sight too, but I cannot remember if I attended or helped to set up any of these meetings.

REFLECTIONS

80. I have been asked to consider whether, in hindsight, there is anything that I would have done differently in respect of the matters raised in this statement. Having reflected on this, I feel that I can only respond based on what I knew or believed at the time.

81. If I had ever suspected there were systemic issues that compromised the integrity of the Horizon IT system I would not have been willing to overlook this. However, I sincerely believe I never suspected that any systemic issues existed. I acknowledge that some documents provided with the Request do point to some issues in relation to the system being identified and raised — such as the findings in Second Sight reports, and some of the email correspondence I was copied into — but as far as I can recall none of these issues provided me with a firm conclusion that there were systemic issues affecting the integrity of the system. Given that this was my genuine belief and knowledge at the time, I do not think there is anything I would have done differently.

82. I am truly saddened by the impact this has had on so many people's lives. I would like to express my sincere and heartfelt sympathies to all of those people who have been effected.

83. Other than what I have set out in this statement, there are no other matters that I wish to bring to the attention of the Chair

Statement of Truth

I believe the content of this statement to be true.

Signed: 

Dated: 12 November 2024

Index to First Witness Statement of Andy Holt.

No.	URN	Document	Control Number
1.	POL00193406	Email from Simon Baker To: Angela Van-Den-Bogerd, Andy Holt CC: Susan Crichton RE: Could we get together on Thurs please	POL-BSFF-0031469
2.	POL00193604	Email from Andy Holt To: Simon Baker, Susan Crichton, Angela Van-Den-Bogerd and others re Training day	POL-BSFF-0031667
3.	POL00197019	Presentation on roles and responsibilities for POL Officers in relation to the Mediation scheme	POL-BSFF-0035082
4.	POL00105609	Email chain from Antonio Jamasb to Dave Hulbert re Horizon - whole network service outage.	POL-0104613
5.	POL00182875	Email chain from Andy Holt to Andrea Harwood, Matt Sadler and others re Post office clerk needing enlightening on our future within	POL-BSFF-0020938
6.	POL00192699	Email chain from Simon Baker to Angela Van-Den-Bogerd, Rod Ismay, Andrew Winn and others Re: Stock adjustment issue and response	POL-BSFF-0030762
7.	POL00145546	Email from Steve Beddoe to Simon Baker, Dave Hulbert, Chris Taylor and others re horizon improvements	POL-BSFF-0004673
8.	POL00297788	Horizon Investigation Level 1 plan v001 20130719	POL-BSFF-0135838

9.	POL00060722	Email from Alwen Lyons to Simon Baker re transaction corrections - Jo Hamilton's case	POL-0057201
10.	POL00297905	Email chain from Rod Ismay to Simon Baker, Andy Holt and Angela Van-Den-Bogerd re: FW: [SPMRs] Stock adjustments - concerning Chesterfield Post	POL-BSFF-0135955
11.	POL00297984	Email from Ron Warrington to Simon Barker, Angela Van Den Bogerd, IRH RE; second sight investigation into shortfall of £6,000.00 on the 4th of November 2009 in post office branch	POL-BSFF-0136034
12.	POL00193030	Email from Gayle A Peacock to Angela Van-Den-Bogerd, Amanda K Stevens, Rod Ismay and others re: Branch Support Programme - Response by midday Friday 2nd would be appreciated	POL-BSFF-0031093
13.	POL00193031	Branch Support Programme – Terms of Reference v.2	POL-BSFF-0031094
14.	POL00413701	Email from Simon Baker to Lesley J Sewell, Cc'd Andy Holt Re: Replacement of Horizon	POL-BSFF-0233875
15.	POL00145915	Email chain from Mark R Davies to Martin Edwards, Chris M Day, Susan Crichton and Others re Fwd: Horizon National Media Enquiries	POL-BSFF-0005042
16.	POL00298276	Email from Ruth Barker to Mark R Davies CC'd Susan Crichton, Andy Holt and others RE; Media	POL-BSFF-0136326

17.	POL00298403	Email from Susan Crichton to Angela Van-Den-Bogerd cc'd Andy Holt re: Horizon review workflow	POL-BSFF-0136453
18.	POL00344252	Email from Andy Holt to Lesley J Sewell re Horizon Core Audit Process - v1 0.ppt	POL-BSFF-0169973
19.	POL00022598	Horizon Data Lepton SPSO 191320 by Helen Rose (v.1 draft)	POL-0019077
20.	POL00202688	Bond Dickinson email - forwarded emails between PO and Howe & Co re disclosure in Post Office mediation claims.	POL-BSFF-0040751
21.	POL00303963	Email from Rod Ismay to Andy Holt re: 2010 Report	POL-BSFF-0142013
22.	POL00029666	POL Spreadsheet of Second Sight Work Stream (Outstanding Actions)	POL-0026148
23.	POL00134525	Powerpoint of Second Sight Mediation Process	POL-0138978
24.	POL00099265	Email chain involving Simon Baker, Alwen Lyons, Susan Crichton and others. Re: "Current cases".	POL-0098848
25.	POL00192267	Email from Simon Baker To: Ron Warmington, Ian Henderson CC: Susan Crichton and others re	POL-BSFF-0030330

26.	POL00192335	Email from Martin Edwards to Simon Baker, Alwen Lyons and others re: briefing note for Paula/JA meeting.	POL-BSFF-0030398
27.	POL00297804	Email from Martin Edwards to Mark R Davies RE: Briefing Note for Paula/James Arbuthnot Meeting.	POL-BSFF-0135854
28.	POL00117036	Email from Simon Baker to Paula Vennells, Martin Edwards, Mark R Davies and others re Horizon Investigation / JA meeting - notes from today's 4.30 meeting, includes actions and items to discuss with JA. Case review process diagram attached.	POL-0117870
29.	POL00407565	Email from Gareth Jenkins to Simon Baker, Cc'd Andrew Winn, Pete Newsome and others Re: SPMRs Stock Adjustments	POL-BSFF-0232633
30.	POL00137330	Sub-Postmaster Improvements & Mediations Weekly Steering Group	POL-BSFF-0000096
31.	POL00162011	Email from Sophie Bialaszewski to Andy Holt and Mark Davies, re Horizon Investigation Level 1 plan v006 20130808.ppt.	POL-0150456
32.	POL00413697	Email from Kay Linell to Susan Crichton, Simon Baker, Ian Henderson and others Re: Membership and voting on the working party	POL-BSFF-0233871

33.	POL00417109	Post Office Sub-Postmaster Improvements & Mediations: Weekly Steering Group report and agenda.	POL-BSFF-0237260
34.	POL00298382	Email from Alan Bates to Simon Baker, Kay Klca, Irh Advanced Forensics and others RE;Comments on Phase 1 Pack	POL-BSFF-0136432
35.	POL00298419	Email from Rodric Williams to Lesley J Sewell and cc'd Simon Baker, Andy Holt and others re: Draft Letter to Fujitsu	POL-BSFF-0136469
36.	POL00298446	Email from Sophie Bialaszewski to Andy Holt, Rodric Williams and Rosie Gaisford re: Mp Handling Plan	POL-BSFF-0136496
37.	POL00146190	Email from Andy Holt to Susan Crichton, Angela Van-Den-Bogerd, Alwen Lyons and others - Re: Working Party Dial-in for Training Day	POL-BSFF-0005317
38.	FUJ00235737	Email from Pete Newsome to Gareth Jenkins Cc'ing Torstein Godeseth re: Update on Post Office Mediation Process for Sub-Post Masters	POINQ0241842F
39.	POL00139864	Email chain from Andy Holt to Martin Smith RE: Post Office Ltd? -? Weekly update	POL-0141040
40.	POL00327060	Email from Laura Pinkney to 'andy.holt' CC ing martin smith; 'Jarnail A Singh'. RE: Weekly Update	POL-0173563

41.	POL00299609	Email from Susan Crichton to Alan Bates, Paula Vennells, Angela Van-Den-Bogerd and CC: Others RE: Post Office Read This RE: Martin Griffiths	POL-BSFF-0137659
42.	POL00116135	Email from Martin Edwards to Andy Holt, Angela Van-Den-Bogerd, Mark R Davies re Note of meeting with Sir Anthony Hooper	POL-0117134
43.	POL00372534	Email chain from Andrew Parsons to Andy Holt, Cc'd Susan Crichton and Rodric Williams Re: FW: M025 - Darren King [BD-4A.FID20472253]	POL-BSFF-0199927
44.	POL00123003	Email from Andrew Parsons to Andy Holt, cc Gavin Matthews, Belinda Crowe and Jarnail Singh re: Sparrow - text for CEO's report	POL-0129227
45.	POL00301456	Email from Andy Holt to Angela Van-Den-Bogerd re: CT 1415a Mediation: urgent requests.	POL-BSFF-0139506
46.	POL00199985	Email from Andy Holt to Angela Van-Den-Bogerd Re: CT1415a Mediation: Urgent requests	POL-BSFF-0038048
47.	FUJ00239552	Email from Andy Holt to Pete Newsome, Michael Harvey, James Davidson RE: Fw: Reactive lines	POINQ0245657F
48.	POL00195750	Email from Ian Henderson to Andy Holt, Dave M King, Ron Warmington & Ors RE: Access to back office accounting systems	POL-BSFF-0033813
49.	POL00220859	Email from Belinda Crowe to Andy Holt, Angela Van Den Bogerd, Belinda Crowe and others - Re: FW: Email retrieval	POL-BSFF-0058922

50.	POL00148887	Email from Belinda Crowe to Chris Aujard, CC'ing: Belinda Crowe, Rodric Williams and others - Re: Email retrieval	POL-BSFF-0008007
51.	POL00367583	Email from Angela Van-Den-Bogerd to Andy Holt, Jessica Barker re: URGENT ACTION PLEASE	POL-0185714
52.	POL00091394	Email from Melanie Corfield to Belinda Crowe, Rodric Williams, Angela Van-Den-Bogerd; re: M053 Revised Draft CRR	POL-0090416
53.	POL00211254	Email from Andrew Parsons to Rodric Williams, Belinda Crowe re: Horizon Access [BD-4A.FID20472253]	POL-BSFF-0049317
54.	POL00349653	Email chain from Andrew Parsons to Belinda Crowe, Rodric Williams and others re: Remote access	POL-BSFF-0175374
55.	POL00099063	Signed Interim Report into alleged problems with the Horizon system	POL-0098646
56.	POL00116179	Email from Sarah Paddison to Andy Holt, Susan Crichton, Angela Van-Den-Bogerd and others re Project Sparrow steering group	POL-0117178
57.	POL00146704	Email from Andy Holt - Project Sparrow Update, to Alwen Lyons	POL-BSFF-0005831

58.	POL00196926	Project Sparrow Overview document	POL-BSFF-0034989
59.	POL00139000	Sparrow Steering Group - Key Points and Actions from Meeting	POL-BSFF-0001220
60.	POL00158093	Email from Belinda Crowe to Andy Holt, Angela Van-Den-Bogerd, Mark R Davies and others re: Scope and Resources for Project Sparrow	POL-0146626
61.	POL00300571	Email from Rodric Williams to Michael Harvey Re: Expert on the Horizon System - Subject to Common Interest Privilege	POL-BSFF-0138621
62.	POL00199809	Email from Jarnail Singh to Chris Aujard CC'ing Hugh Flemington, Andy Hold and others RE: Budget and Draft Appointment of Independent Horizon Expert for	POL-BSFF-0037872
63.	POL00148693	Email chain from Andy Holt to Jarnail Singh Andrew Parsons cc Andrew Pheasant Gavin Matthews Martin Smith & others RE: Expert	POL-BSFF-0007814
64.	FUJ00236423	Email from James Davidson to Bell Gavin, cc Michael Harvey re FW: ICL initial review and requests	POINQ0242528F
65.	FUJ00238073	Fujitsu report on Horizon integrity by James Davison	POINQ0244178F

66.	POL00348522	Email chain from Andy Holt to Neil Wilkinson, Lesley J Sewell, Dave Hulbert and others re: The Round Table Meeting with the IT Experts	POL-BSFF-0174243
67.	POL00148950	Email from Jarnail Singh to Andrew Pheasant, Jessica Madron, cc'ing Andrew Parsons and others re: CK Draft Instructions to Expert	POL-BSFF-0008070
68.	POL00325918	Email from Andrew Pheasant to Jarnail Singh, Martin Smith, Andrew Parsons and others Re: CK Draft Instructions to Expert [BD-4A.FID20472253]	POL-0173053
69.	POL00148749	Advice from Cartwright King Solicitors re matters of concern arising out of the instruction of Imperial Consultants Limited	POL-BSFF-0007870
70.	POL00264768	Email from Julie Gpoerge to Belinda Crowe, Andy Holt Re: RE: Horizon	POL-BSFF-0102831
71.	POL00028062	Report: Horizon Desktop Review of Assurance Sources and Key Control Features - draft for discussion, Deloitte	POL-0023065
72.	POL00304662	Email from Andy Holt to Dave M King, Rodric Williams and cc'd Jarnail Singh re: FW: Document List for Post Office Horizon Expert Witness Engagement	POL-BSFF-0142712
73.	FUJ00241523	Fujitsu - POL - Mediation Update.	POINQ0247628F

74.	POL00004439	Initial Complaint Review and Mediation Scheme - Briefing Report - Part One - Prepared by Second Sight	VIS00005507
75.	POL00022150	Initial Complaint Review and Mediation Scheme - Mediation Briefing Report: Draft V2	POL-0018629
76.	POL00207734	Email from David Oliver to Andy Holt, Rodric Williams and Belinda Crowe, re: Second Sight Part Two report	POL-BSFF-0045797
77.	POL00207767	Email from Andy Holt To: Lesley J Sewell, Dave Hulbert, Neil Wilkinson re URGENT FW: Second Sight Part Two report	POL-BSFF-0045830
78.	POL00148952	Email from Belinda Crowe (POL) to Andrew Parsons (WBD); Rodric Williams (POL) & Others Re: Request for an interview following second sight investigation	POL-BSFF-0008072
79.	FUJ00175066	Email from Ian O'Driscoll to Michael Harvey CCing James Davidson, Pete Newsome and others re: RE: Freedom of Information Act Request re: Second Sight Part Two Report	POINQ0181247F