Witness Name: Alan Johnson

Statement No.: WITN03380200

Dated: 11 November 2024

POST OFFICE HORIZON IT INQUIRY

SECOND WITNESS STATEMENT OF ALAN JOHNSON

I, Alan Johnson, will say as follows.

Introduction

- 1. I make this statement in response to the Inquiry's request for evidence dated 20 September 2024 ("the Rule 9 request"). I have prepared it with the support of the Government Legal Department and counsel, and I have relied on others to provide me with relevant documents.
- 2. This statement, and the Rule 9 request to which it relates, addresses matters which the Inquiry is considering as part of Phases 5 & 6 of the Inquiry (Redress and Governance). As the Inquiry knows, I have previously provided a witness statement dated 13 September 2022 (which I understand has been given the reference WITN03380100) and given oral evidence (on 1 December 2022) for the purposes of Phase 2 (Horizon IT system). There is a substantial overlap between the issues which I have been asked to address in this witness statement and the evidence I have already provided to the Inquiry. This statement should therefore be read together with my earlier evidence.

3. I note that the matters which I have been asked to address date back a considerable time and, whilst I have a fair memory of the big picture, my recollection of the detail is not perfect. I have therefore been heavily reliant on documents put before me by the Inquiry as part of the Rule 9 request and by the Department for Business and Trade ("DBT" or "the Department").

Professional Background

- 4. For a brief summary of my career, I refer the Inquiry to paragraphs 3-7 of my first statement (**WITN03380100**) in which I stated as follows:
 - "3. Between 1968 and 1987, I was a postman working for the Post Office.
 - 4. Between 1987 and 1992 I was an officer of the Communication Workers' Union ('CWU'). In 1992, I was elected General Secretary of the CWU and retained that position until entering Parliament in 1997.
 - 5. Between 1 May 1997 and 3 May 2017, I was Labour MP for Kingston upon Hull West and Hessle. During my time in Parliament I held the following ministerial posts:
 - a. Parliamentary Under-Secretary Minister for Competitiveness,
 Department of Trade and Industry ('DTI') 29 July 1999 to 7 June 2001;
 - b. Minister of State (Employment Relations, Industry & the Regions) 11
 June 2001 to 13 June 2003;

- c. Minister of State at the Department for Education and Skills (Lifelong Learning, Further and Higher Education) 13 June 2003 to 9 September 2004;
- d. Secretary of State for Work and Pensions 9 September 2004 to 6 May 2005;
- e. Secretary of State for Trade and Industry 6 May 2005 to 5 May 2006;
- f. Secretary of State for Education and Skills 5 May 2006 to 28 June 2007;
- g. Secretary of State for Health 28 June 2007 to 5 June 2009; and
- h. Home Secretary 6 June 2009 to 6 May 2010.
- 6. I held the following shadow posts:
 - a. Shadow Home Secretary (12 May 2010 to 8 October 2010); and
 - b. Shadow Chancellor of the Exchequer (8 October 2010 to 20 January 2011).
- 7. As I set out above, quite apart from my professional association with the National Federation of Sub-postmasters ('NFSP') as a Union representative, I worked for 19 years as a delivery postman serving in London before transferring to Berkshire. I worked closely with sub-postmasters and sub-mistresses, going behind the counter to collect parcels, registered letters and other items transacted across a post office counter. I know how highly regarded and trusted these people are in their communities. The way many of them have been treated appals me. It's not just the anguish of the legal process they've been subjected to, it's

the diminished status they would have had to endure in the small communities that they work in. The post office network is a crucial detail in the social fabric of this country. For the Post Office to condemn those responsible for its high reputation to such terrible ignominy is unforgivable."

5. In January 2011 I relinquished my role as Shadow Chancellor of the Exchequer and thereafter sat as a backbench MP before standing down from Parliament at the 2017 General Election. Since then, I have worked as an author and have published a four-volume memoir (the third of which may, as explained below, be of interest to the Inquiry), a biography of Harold Wilson and three novels.

The Post Office Review and White Paper

6. Prior to the General Election of 1 May 1997, the Labour Party Manifesto included a commitment to give the Post Office "greater commercial freedom to make the most of new opportunities". This was considered important for a number of reasons. The Post Office had existed as a statutory corporation at arm's length from government since 1969, but its potential was limited by archaic restrictions on its commercial independence – for example, it was unable to raise funds on commercial markets, and its profits were divested to government rather than invested back into the network to promote future sustainability and growth. The Post Office had existed as a state monopoly, but the postal market had opened up to competitive pressures and new technologies and markets offered both threats and opportunities. The natural response to this was to allow the Post Office to compete on ordinary commercial lines, seizing opportunities to grow the

business, drive efficiencies, generate profits and improve services; at the same time, it was important that the Post Office remained in public ownership, in recognition of its vital social purpose which is essential to the fabric of our nation. My union, the CWU, had produced a blueprint as to how this could work in practice while I was the General Secretary.

- 7. Immediately following the election, the New Labour government announced and instituted a review of the post office network ("the Post Office Review"), the aim of which was to identify and formulate a more detailed proposal to put into effect the manifesto commitment and give the Post Office greater commercial freedom.
- 8. I had just been elected as an MP, and in summer 1997 I was asked to take on a role as an "unpaid ad hoc advisor" to the Minister Ian McCartney (now Sir Ian) on the Post Office Review (Letter from Rachel Jenkinson to Moira Wallace, Appointment of Alan Johnson Mp as an adviser to Mr McCartney on the Post Office (CBO00100005_100)). My assumption is that I was brought into this role due to my background as the immediate past General Secretary of the CWU, and the work that my union had done to defeat the proposed privatisation of the Post Office under the Major government and our blueprint for a future Post Office without existing commercial restrictions. My involvement on the review was informal and amounted to little more than a couple of meetings with civil servants at which I accompanied Ian McCartney, and several with the minister himself. I had very little involvement with the formulation of the legislation and was more of a sounding board for the minister. The deliberations were entirely around how Royal Mail could use these new commercial freedoms to compete more

effectively in the communications market and the role and powers of the new regulator. So far as I can recall none of these discussions related to the Counters network. Should the Inquiry require more detail, my role in the review is described at pages 177 to 179 of the third volume of *my memoirs* – 'The Long and Winding Road'.

- Upon completion of the review, in July 1999 the Government published a White Paper: "Post Office Reform: A World Class Service for the 21st Century" ("the White Paper") (POL00089812).
- 10. The Inquiry is no doubt familiar with the contents of the White Paper. The reforms proposed were substantial (and necessarily so). Particularly relevant are Chapter 6, which deals with the proposed changes to the Post Office's corporate structure and increased commercial freedoms (see especially paragraphs 15-22 at pages 51-52), and Chapter 5, which describes the intended relationship and accountability between the Government and the Post Office in its new corporate guise.
- I explained some of the logic behind the changes proposed in the White Paper in a letter to Harry Barnes MP dated 14 October 1999 (BEIS0001205).
- As the Trade and Industry Select Committee noted in its report of 21 September
 1999 (WITN03380201), the White Paper received a warm reception.

Role as Minister for Competitiveness

- 13. I was appointed as Minister for Competitiveness in the Department of Trade and Industry ("DTI") on 29 July 1999. This was my first ministerial appointment, and it was a Parliamentary Under-Secretary of State position (the most junior of ministerial positions). I remained in the role until 7 June 2001, when I was promoted to Minister of State (Employment Relations, Industry & the Regions), also in DTI, after which I ceased to have responsibility for or involvement in Post Office issues.
- 14. My portfolio as Minister for Competitiveness covered a range of policy areas, an important aspect of which was the Post Office. One of my responsibilities was to give effect to the White Paper, developing and piloting through Parliament the Postal Services Bill which was ultimately passed into legislation as the Postal Services Act 2000. The nature of my portfolio, and the extent to which it involved the Post Office, was explored when I gave oral evidence to the Inquiry on 1 December 2022 [p.54, line 11]:
 - "Q. That was your official title: Parliamentary Under-Secretary of State?
 - A. Yes, they called it "Competitiveness" but I was in charge of manufacturing industry, employment relations, biotechnology, chemicals, the steel industry, the Post Office, and a few others. But it all came under the title of many of "Minister for Competitiveness".

- Q. You've anticipated my next question. Your portfolio in that two-year period included oversight and responsibility for the Post Office?
- A. Yes.
- Q. What else was in your portfolio?
- A. I've just had a run through there. So employment relations, including ACAS, manufacturing industry in general, but in particular biotechnology, the steel industry, the chemicals industry and one or two other bits of manufacturing, aerospace, for instance, which was a big part of my job, Airbus, et cetera, on the European front. So it's quite a [mixed] portfolio.
- Q. What proportion of your time and work was taken up, can you recall, with issues relating to the Post Office?
- A. Quite a bit, because we were taking through the Postal Services Bill, so when you have a Bill it's not usually -- the Secretary of State does second reading but it's the junior ministers that go through the committee corridor and do the line-by-line stuff on a Bill, which is quite concentrated, and a lot of work involved in that. So there was that, plus there was the fact, because of my background, I was very interested in this part -- you know, I'd never worked in the steel industry, I'd never worked in biotechnology, but I'd worked in the Post Office.
- Q. If you were to put a fraction on it, as best as you can, how much time was taken up with Post Office issues in that two-year period?

- A. I would say that -- when the Postal Services Bill was going through, I would say about 40 per cent of my time was taken up with that.
- Q. And when the Bill had passed?
- A. About 20 per cent."
- 15. As Minister for Competitiveness (as with all my other ministerial appointments), I was supported by civil servants within my private office and by policy officials responsible for the various policy areas falling within my portfolio. Naturally, therefore, I was supported by these officials in relation to Post Office matters including in developing and piloting the Postal Services Bill during my time as Minister. I was also assisted, in the usual way, by a team of Parliamentary draughters to ensure that the Postal Services Act 2000 was written in a way that gave effect to Parliament's wishes. My boss, and point of escalation, was the Secretary of State Stephen Byers served in this role throughout my time as Minister.
- 16. The Government's objective in developing and enacting the Postal Services Act 2000 was to give the Post Office the commercial freedom it needed to be able to continue to fulfil its critical social function over the long term, and to put in place a corporate structure that was fit for purpose for an arm's length body operating with those new commercial freedoms.
- 17. There was very little in the Postal Services Act that impacted on Post Office Counters. The issue for that part of the business wasn't commercial freedom, it

was an existential problem of operating in a world where far fewer people had cause to visit their local post office. The network was shrinking at an alarming rate. I was therefore delighted when the PM commissioned a review of the counters network by the Performance and Innovation Unit ("PIU").

- 18. Shortly after taking office as Minister for Competitiveness, I asked my private secretary to write to David Sibbick (the relevant civil servant) to be kept abreast of the PIU's work and indicating I was keen for their work to get underway as quickly as possible (**BEIS0001206**).
- 19. At paragraph 35 of my witness statement (WITN03380100) for Phase 2, I stated:

"A bunch of bright civil servants in the Performance and Innovation Unit ('PIU') in 10 Downing Street, working directly to the Prime Minister were preparing a report on the future of the post office network and we had been very happy that PIU had picked this as their first project. New opportunities, such as Government Gateway (also known as Government General Practitioner) were becoming apparent as a result of the PIUs work. I wrote to the PIU in December 1999 to explain the work of the HWG and to enclose a submission the HWG had completed that addressed some of the opportunities we had identified (see Draft Letter and Joint Submission by the Horizon Working Group to the PIU Study on the Post Office Network, WITN0338 01/9) [BEIS0000428]." (BEIS0000428)

- 20. I was asked about the work of the PIU when giving oral evidence to the Inquiry on 1 December 2022. The exchange was as follows:
 - "Q. What was the PIU?
 - A. Performance and Innovation Unit of Number 10.
 - Q. Just describe to us -- we're going to hear more from Sir Geoff Mulgan this afternoon about the PIU, but can you introduce the PIU to us, please?
 - A. Yes, this was very much a whizzy kind of Government initiative that where there were serious problems, there ought to be group of very, very committed civil servants from right across government. It shouldn't be decompartmentalised [sic], it shouldn't be siloed. Where an issue crossed government borders, as this did, because it involved DSS, as well as DTI and others, a real attempt should be made to look to the future, look at how these issues can be resolved, and produce a report with the backing of Number 10. Very important that the Prime Minister was involved. A neutral minister was appointed to oversee it, Charles Clarke in this case, and we were very pleased -- "we" being the DTI, but also, I think, all the unions and everyone involved in the Post Office -- that the Post Office went right up the list to the top. Because there were many other issues, obesity, for instance, was one that they eventually got round to. So of all of those problems, the Post Office was seen as paramount and that pleased us very much because it allowed us to

develop these ideas about what the computerised network could do and what more work we could bring across Post Office Counters.

- Q. So generally it was seen a good thing by the DTI -
- A. Oh -
- Q. One impression that one might have got from your witness statement, where I think you mentioned there was a group of "bright, young things"
- A. I wasn't being detrimental there. That wasn't a -- yeah. That wasn't a derogatory comment.
- Q. Right.
- A. They were genuinely bright, and very, very committed. I met them a couple of times as they built up steam."
- 21. I met with the PIU on one occasion, 13 October 1999, and the discussion is recorded in a reasonably detailed minute (Attachment to email: Minute of Meeting with Performance and Innovation Unit dated 13 Oct 1999 (BEIS0000436)). I also encouraged John Roberts to cooperate fully with the PIU at a meeting on 8 November 1999 keen to ensure the report they produced was the product of full cooperation of all key stakeholders (Letter from Derek Davis to Judy Britton dated 8 November 1999 (BEIS0001207)).

- 22. The HWG also provided a joint written submission to the PIU, of which I was the signatory. A draft version of the letter is exhibited as BEIS0000428. I understand DBT has been unable to locate the final version of the letter as sent.
- 23. The PIU published its report "Counter Revolution: Modernising the Post Office Network" in June 2000 (WITN03380202). I agreed with the findings of the report. I was pleased that they understood the importance of computerisation and were enthusiastic about allowing customers of any bank to access its services through their local post office and about the concept of sub-postmasters and -mistresses being a "Government General Practitioner" at a time when far fewer people had access to the internet.
- 24. Ministers are always reliant on the relevant teams of officials to do the vast majority of the day-to-day work relevant to each policy area. That means exercising judgement about the issues and the level of detail that Ministers need (or would want) to know. As a Minister, I would expect officials to inform me accurately, but at a high-level, about relevant issues within my portfolio, and would ask for my more detailed steers and decisions where they considered it necessary or appropriate. I trusted them to make these judgements in good faith and to the best of their ability, and have no reason to believe that they did not do so. Therefore, in answer to the Inquiry's question in the Rule 9 request "How did you satisfy yourself that you were receiving a full and accurate account of POL's operations and strategy?", the simple answer is that I did not need a full and accurate account of POL's operations and strategy and I would have been overwhelmed if I had asked for this level of detail (for the Post Office, not to

mention the rest of my portfolio). What I needed was an accurate and sufficiently complete understanding of the issues which needed my input. In relation to the Post Office, I relied on officials, and (as I explained in my evidence in Phase 2) I was also in regular contact with the unions (who would inform me of issues they were concerned about) and spent a lot of time travelling around the country visiting post offices across the country, particularly in rural areas, to speak to the people at the coalface. In relation to Horizon, we also had the Horizon Working Group ("HWG"), referred to in my evidence in Phase 2. My main point of contact at the Post Office was John Roberts (Chief Executive) who I met regularly, as this meeting minute indicates (BEIS0001207). I also met directly with the trade unions, with MPs with concerns about Post Office issues within their constituencies, and with Select Committee members. Additionally, officials escalated any particular issues to me as required. Putting all of this together, I feel these structures were ample to allow me to do my job as Minister.

25. Clearly there were times when as a Minister I did become involved in what might be described as Post Office operational matters (or where the operational and strategic distinction was blurred). For example, when I became aware that subpostmasters running a small category of counters units called Modified Sub-Post Offices ("MSPOs") were not recognised by the business for collective representation through the NFSP, I drew this to the attention of John Roberts, then Managing Director of the Post Office, who agreed to rectify what was clearly an anomaly (Letter from Alan Johnson to J L H Ward re letter on behalf of Modified Contract SPMs and treatment by POCL against them (UKGI00015816)).

26. During Phase 2, I gave evidence to the Inquiry about how and why I asked for the Horizon roll-out to be paused. At paragraphs 18-22 of my first witness statement (WITN03380100), I stated:

"Roll out had already commenced when I took office. As it progressed, I

recall concerns about training and quality of software being raised at a meeting of the NFSP's National Executive Council. These are recorded in the Report of a Meeting of the National Executive Council held on 18-20 October 1999 ('NFSP Report') (WITN0338_01/6) at page 22 [NFSP00000458]. Because of those concerns the roll out was paused by POCL in November 1999 and didn't recommence until January 2000. [...] I shared [these] concerns with POCL which prompted a pause to review the roll out in November 1999. The roll out had been gradual, with only around 600 of the 19,000 post offices involved when I took office. As it says in the NFSP Report, I did not want Horizon rolled out further 'until it had improved. Different training and software was essential' (WITN0338 01/6) [NFSP00000458]. That said, I think everyone would have been amazed if there were no problems at all given the size and scale of what was being implemented, especially in a world where digitisation was so new. The problems we were seeing reflected an expectation of what might happen with such a programme. I raised the concerns with Dave Miller who was in charge of Horizon for POCL (WITN0338 01/6) (NFSP00000458). I asked for the roll out to be paused

and reviewed before it continued. When roll out was resumed, I felt reassured that both POCL and NFSP were happy for it to continue."

27. As I explained at paragraphs 30-33 of my first statement:

"I recall the reasons for the delay being the technical issues with Horizon. I recall attending the final 30 minutes of the POL Board meeting on 11 January 2000 that is recorded in Post Office Board Minutes, Meeting of 11/01/2000 (WITN0338 _ 01 /8) [POL00000336]. Page 10 states that the pause on the roll out would end that month after work to rectify difficulties in system stability and accounting integrity. I had no involvement in the technical aspects of computerisation. My understanding was that resolving such problems was a matter for POCL and ICL, rather than for DTI officials or myself.

The balancing issues referred to in the NFSP Report (WITN0338_01/6) may have been one of the technical issues referred to. These issues might have been an early indication of what was to come [NFSP00000458). But it is important to say that the general attitude of everyone, from Ministers to POCL to postmasters was that Horizon was seen as a solution, not a problem. Nobody involved, least of all the sub-postmasters, wanted it scrapped but we did of course want it to operate properly.

My understanding was that the technical issues were being resolved between POCL and ICL. As stated above, this was explained to me in the POCL Board Meeting I attended (WITN0338_01/8) [POL00000336].

When POCL and the NFSP reported that action had been taken and that the gradual rollout could re-commence I was satisfied that the action taken must have been appropriate. I was neither qualified nor authorised to countermand their conclusions. POCL was responsible for commissioning Horizon into post office branches and NFSP represented 80% of subpostmasters. Given their approval, there was no reason for me to go behind what they were reporting. Everyone was keen for Horizon to be working well because the migration to ACT in 2003 was getting ever closer.

- 28. I have been asked for my recollections as to the quality and competence and oversight and input into the progress of the Horizon project by the stakeholders involved in the HWG, and as to the effectiveness of communications and working relationships between them.
- 29. At paragraphs 15 and 16 of my first witness statement (**WITN03380100**), I explain the role of the HWG:

"The Horizon Working Group's ('HWG') role was to (a) involve staff through their elected representatives in decisions on computerisation of the network and (b) feed back any problems experienced by staff at the trial offices (see terms of reference for the HWG at pages 13 and 14, Papers for Horizon Working Group Meeting December 1999 from DTI to representatives of POCL, CWU, NFSP, CMA, WITN0338_01/5, [NFSP00000063]. It was an important forum for maintaining a collaborative approach to this huge computerisation project.

The HWG had no role overseeing or resolving any technical programming problems that may have arisen with the Horizon software. The extent of our role was to be a forum for these problems to be raised and then referred on to POCL to address with ICL."

- 30. I considered the work of the HWG as "very important to the success of the Horizon Project" (Letter on Horizon Working Group meeting on 8 November. Attached is meeting agenda and minutes of Horizon working group meeting on 11 October 1999 (NFSP00000066)), and my perception at the time was that the HWG did its job effectively. Issues such as insufficient training, frozen screens, inadequate Helpdesk support, system stability issues, and balancing problems were raised for the Post Office and ICL to resolve (NFSP00000066).
- 31. I had confidence that the unions would not shy away from raising the concerns of their members. I knew Colin Baker, General Secretary of the NFSP, in particular to be an effective and robust operator. I am aware that when Mr Baker gave evidence to the Inquiry, he suggested that the NFSP's approach was that problems with Horizon should be raised with care because they did not want to "kill" Horizon (30 November 2022, page 51, line 5). If that was their approach it was not explained at the time and would have been at odds with the whole point

of the HWG, which was to identify issues so that they could be fixed. And my experience in the meetings was that the NFSP and CWU were clear and robust in raising concerns about Horizon prior to the pause in the roll out.

- 32. Of course, I cannot say what the NFSP and CWU knew or did not know at the time for example, I would assume that the reason they did not raise the situation of Pamela Lock is that they did not know about it, but I do not know this for sure.
- 33. At the time, I found the communications within the HWG to be effective enough, albeit other non-Horizon issues were regularly brought up. The CWU were very much focused on the Postal Services Bill, whilst NFSP were keen to ensure that customers knew that they could continue to access benefits across the counter, for example (see Steering brief for Horizon Working Group (BEIS0000224); Briefing re 'Post Office: BA Mailshot on Child Benefit Allowances' (BEIS0001208); and draft letter from Mr Johnson to Jeff Rooker MP (BEIS0001209). The working relationships were sometimes strained (I did not always have any easy relationship with Derek Hodgson, my successor as General Secretary of the CWU: see submission re media strategy for T&I report and secretary of state speech (BEIS0000479); Letter from Derek Hodgson, Terry Deegan and Colin Baker to Alan Johnson MP re Future of the Post Office Network (CWU00000103); Letter from Derek Hodgson (CWU) to Johnson MP (Department of Trade and Industry) re: Horizon Working Group (CWU00000100); and I was unhappy about leaks to the media: see draft letter to Horizon Working Group (BEIS0001210), but that is not unusual in a forum of this type and I do not believe it had a negative effect on the work of the Group. I

certainly do not think Derek Hodgson ever shied away from raising concerns due to our history; indeed, the opposite is probably true. My recollection is that the HWG did the job it was set up to do effectively.

- 34. There was never any sense that the issues that were being surfaced in the HWG were being ignored. For example, when I asked for the roll-out to be paused for various issues to be resolved, I relied on the Post Office and, more importantly, the representatives of the workforce (the NFSP in particular) to signal that the technical hitches had been addressed to the extent that roll out could continue. This is reflected in the various updates I was provided between October 1999 and January 2000, including prior to the HWG meeting on 11 October 1999 (Attachment: Steering brief re Horizon Working Group meeting 11 October 1999 (BEIS0000231)); at that meeting itself (NFSP00000066) and at the POL Board meeting on 11 January 2000 (Minutes of the Meeting held at 148 Old Street on 11 January 2000 (POL00089772)).
- 35. For example, on 11 October 1999 Mr Baker voiced concerns on behalf of NFSP members about the Horizon system issues but noted that the problems "seemed to be being sorted out and training seemed to have improved" (NFSP00000066).
- 36. On the 20 January 2000 I received a further update from David Sibbick which confirmed that the roll-out would recommence as planned as follows:

"You will be pleased to learn that after some fairly tense final stages both POCL and ICL have accepted that the problem of data corruption has now been solved to the satisfaction of both sides. As a result the Horizon rollout programme will resume on the planned date of 24 January [...]" (Letter from David Sibbick to SoS re issues with Post Office (BEIS0000223))

- 37. As is clear from these contemporary documents, the decision to continue with the roll-out did not mean that we thought the entire IT system, training and support were now perfect but that they had either been resolved or were being resolved so that the roll out programme could recommence. We were all clear that more work needed to be done to resolve continuing issues including in respect of balancing (see CWU00000103). Given that the weekly balance was such a crucial aspect of the work of those serving behind the counter and that computerisation was supposed to help them in this task, it is not surprising that this was mentioned as a problem, but it was never identified as a problem that was not being addressed. Of course, it has to be remembered that it was in the Post Office's interests that its new computer system worked; the point of the HWG was to bring the concerns of the workforce to the Post Office's attention so that they could be looked into and resolved.
- 38. During my time as Minister (and, later, as Secretary of State), I was never given the impression that things had got off track following the recommencement of the roll-out of Horizon. Of course, some problems were to be expected in any new computer system, and it was also obvious that a step change from the old quill and parchment system of bookkeeping to a computerised system would require a decent level of training and support and some time to bed in. Occasional glitches would have been reported initially to officials and only elevated to

ministerial level if they were becoming intractable. Union officials on the HWG were free to raise such issues either at meetings of the Group or more informally with me personally given our long and close relationship. This issue was explored when I gave oral evidence on 1 December 2022 (page 92, line 8):

"Q. Can we turn to your witness statement, please, at paragraph 20 on page

7. You say:

"That said, I think everyone would have been amazed if there were no problems at all given the size and scale of if what was being implemented, especially in a world where digitisation was so new. The problems we were seeing reflected an expectation of what might happen with such a programme."

You've given a piece of evidence this morning to similar effect. Should the Inquiry take that to mean that the number, the nature, the level of issues being raised with you in these meetings were no more than teething issues or glitches that might be expected in the rollout of any such large scale project and nothing more than that.

A. Yes, I think so. I see here it was 600 offices out of, what, 19,500. That was -- the whole point was to get these issues out early. So there were no alarm bells ringing that this might be a huge problem with this, certainly not that it ought to be replaced or that we were building up problems in the future, issues were raised, they were raised with the Post Office, they raised them with ICL, we got a thumbs-up that those were resolved, and rollout carried on."

39. And as I explained when giving oral evidence, everyone recognised that the key thing was to have a system that worked (page 82, line 20):

"I don't think -- I didn't differ from Ian McCartney in the importance of the timescales and deadlines, but my view, and I think it would have been Ian's view as well, was that we had to sort out the problems."

- 40. A really important point is that, whilst everyone would have expected teething problems in an IT project of this size (and I certainly did), neither I nor I believe anyone else in Government was able to foresee the Post Office's subsequent approach: denying that there were any problems in the IT system, taking civil and criminal action based on the false claim that the system was fully robust, failing to comply with basic disclosure duties, and relying on misleading expert evidence. So from my perspective now looking back, issues with the IT were not really the problem; the problem was the Post Office's denial, non-disclosure and cover-up. I am at a loss to understand why people in the Post Office thought it acceptable to act in this way.
- 41. Again, this was an issue about which I gave oral evidence in December 2022 (page 93, line 20):
 - "Q. Was any consideration in the meetings given to what was happening to the subpostmasters on the ground in terms of balancing problems, given

that they had a contractual obligation to make good shortfalls, and whether they should be given the benefit of the doubt when any shortfalls arose?

A. The issue never arose. I don't remember that being raised at any Working Group meeting that I chaired.

Q. Were you aware, or was there any discussion, in the Working Groups that you chaired, about what should happen to subpostmasters in terms of investigation, suspension and prosecution of them, where Horizon showed a shortfall?

A. No.

Q. The Inquiry has received evidence from one subpostmistress, Pamela Lock, that she began to see shortfalls on the Horizon System in January 2000. She took some money from her own ISA to put money into the system -- £5,000, I recollect -- in order to make it balance, but the shortfalls continued. She has told the Chairman that she was phoning the helpline two to three times a week about the shortfalls. They provided no help, that in July 2000, auditors came to her branch and found a shortfall of £26,000. They asked her where the money had gone, and she said that it must be in the system, it must be the paperwork, because she didn't have the £26,000. But the auditors closed her branch, they took away the keys. She'd been a subpostmistress for 25 years. She was interviewed and then taken through the criminal justice system by the Post Office. Did you know that any of that was to going on --

A. No.
Q whilst the Horizon Working Group was meeting A. No.
Q and overseeing, and actively managing, the rollout of the system?
A. No.
Q. If you had known about the conduct of Post Office Counters Limited to
Ms Lock or people like her, what would your view have been?
A. One of disgust.
Q. Why?
A. That she should be treated in that way. This was a new system so you're
saying this happened in July 2000?
Q. The first shortfall she noticed was in January 2000
A. January 2000, so
Q and the auditors arrived in July 2000.
A. That's crazy. It's should have been something we knew about, if it's
connected, as it seems very much to be connected, with the software.
That's precisely what the Horizon Working Group was there to hear, those
kind of issues. That, in particular, I mean, would have been

set alarm bells going with anyone remotely concerned with the trade union world and employment relations, and who, as I did, understood some of the kind of overreactions you sometimes got from what we used to call the Post Office Investigation Division.

Q. Why did you sometimes get overreactions from what was then called the Post Office Investigation Division?

A. I won't bore you with the strikes I had to deal with. So when we worked on the sorting office floor, we worked under two-way mirrors, where we were watched all the time by people from the Investigation Department, and sometimes they would come and arrest people standing on the sorting office floor for all kinds of things. One guy looked at a travel brochure that was going to a country that he was going on holiday to and, as he was standing at -- what we used to call the packet frame, manually sorting this, he just for a second, took it out to looked at it, was arrested and taken to prison. He was a war hero, by the way. It happened in Preston: big national strike spread right across the north west. So I wasn't a stranger to the kind of strongarm tactics that were sometimes used by POID. Now Counters people were in a completely different situation, the subpostmistress that you described, it's her livelihood, her home, probably. And, as I say at the beginning of my report, the reputation of the Post Office was largely there because of subpostmasters and subpostmistresses being valued in their community. So the effect this would have had, this would have set all kinds of alarm bells going.

Q. Against the background that you describe, was any thought given by the Working Group to what shall we do in the interim? We've got these problems being reported to us with the system. There's not only an imperative to solve them but we need to look after our people whilst those problems are solved, and that they're not, for example, hauled over the coals, not criminally investigated when there might be a different explanation for the shortfalls.

A. I would have thought that would have been specifically outlawed during a period when people were getting used to the new system. That wasn't -- right, so the point that you raised, the issues you raised about that subpostmistress, didn't come up at any meetings, didn't come up at the NFSP conference, which was in May of that year. Nobody came to me with that. Nobody put the kind of red flag up that should have been put up about what happened to that woman, because it was obviously

a precursor of what was to come."

- 42. I have been asked to comment on a handful of documents in which issues with Horizon were raised following the decision to recommence the roll out on 24 January 2000. I deal with these in turn below.
- 43. **UKGI00015816** is an undated draft letter which was apparently created by Mike Whitehead, who I understand was a Departmental civil servant, on 2 September 2000 following some earlier correspondence between me and JLH Ward of Goole Post Office. I have not seen a copy of the letters of 13 August 2000 or 22 August 2000. I am also not sure whether this draft letter was ever put before me

or sent, though a version of it probably would have been. I do recall speaking to John Roberts to ask him to agree to collective representation of MSPOs by the NFSP and that he immediately agreed. I do not specifically recall JLH Ward raising his "personal experience in respect of cash shortages", though it appears the relevant civil servants were aware and that the issue was relayed to John Roberts to look into. There is nothing in here that would have set any alarm bells going.

- 44. **UKGl00015808** is another undated draft letter prepared by Mike Whitehead, apparently on 8 December 2000 in response to a letter (which I have not seen) from PT Parry on behalf of GS Dhillon, formerly of Fleetdale Parade Sub Post Office. I do not know if this was the final version placed before me for signature. It appears to follow some correspondence in relation to the same issue with Howard Stoate MP (which, again, I have not seen). The draft reply tends to suggest that PT Parry had raised issues relating to the termination of GS Dhillon's contract. I do not know whether Horizon issues were raised in the correspondence. Clearly the relevant civil servants were aware. Again, this would not have set alarm bells going.
- 45. UKGl00013992 is a draft letter apparently prepared by Mike Whitehead on 5 February 2001, in response to a letter from Anne Mcintosh MP to the Secretary of State, Stephen Byers, concerning her constituents Geoffrey and Jean Newton. I have not seen Anne Mcintosh's letter, though it appears from the draft response that it related to concerns that elderly sub-postmasters had with computerisation of the system. I think it is likely that a letter similar to this draft was sent in reply.

Anne Mcintosh's letter was representative of concerns that elderly and sometimes single-handed sub-postmasters and -mistresses would struggle with computerisation. There was a feeling, still prevalent today but rampant a quarter of a century ago, that computers could only be successfully navigated by the young. The key, of course, was proper training and support. The substance of the response was to provide reassurance that technical assistance was available when and if it was needed.

- 46. I should pause here to explain two things. First, as a Minister I received maybe 100 draft letters a night to review and sign in my red box. I did not draft the letters and was not in a position to second guess the factual accuracy of the contents I trusted civil servants (in this case Mike Whitehead) to ensure that the contents were accurate. I would have taken a particular interest in those relating to Horizon. The problems with training and support which had led to the roll-out being paused had, so far as I knew, been or were being resolved to the satisfaction of the business and its unions by the time roll-out re-commenced on 24 January 2000. Following that recommencement there was nothing to signify that training and support was failing to any significant degree.
- 47. I have also been asked for my recollections on my letter dated 1 May 2001 to Joan Humble MP, principally relating to her constituent Julie Wolstenholme (POL00118220). As explained above, this letter would have been drafted for me by the relevant officials, and as the Minister I had to rely on them to take appropriate steps to ensure its accuracy. I should say that the contents of the draft letter were in no way inconsistent with my understanding of the way the

process worked at the time, based on my interactions with the various stakeholders. There was nothing in here that would have made me sit up and question the accuracy of what I was being told by officials, the Post Office and the unions – it was all of a piece. I am now aware, on having seen my successor Douglas Alexander's letter to Joan Humble dated 24 April 2002 (POL00118221), and the witness statement of Julie Kay (née Wolstenholme) dated 30 June 2023 (WITN09020100), that the assertion in my letter that the Helpdesk logged no calls in relation to problems with the system at Julie Wolstenholme's Post Office was simply incorrect. Obviously I had not known this at the time. Knowing what we know now, it is probably safe to conclude that the civil servants who prepared this letter had been provided with false or at least inaccurate information by the Post Office. It is deplorable that such mistakes were made and I can only add my apology to that provided by Douglas Alexander on my behalf.

48. Finally, I have been asked to consider an email from Lee Castleton dated 13 December 2009 (POL00165914). I have no recollection of ever seeing or being aware of this email, and it is virtually certain that I did not see it and was not told of its existence or contents. The email would have been received within my private office (not directly by me). By this time I was Home Secretary and Post Office matters did not fall within my portfolio. Nor was I Mr Castleton's constituency MP and, as I explained at paragraph 44 of my first witness statement, "There is a strict parliamentary rule against making representations on behalf of people to whom the MP isn't accountable (i.e. non-constituents)." I cannot imagine any circumstances where my private office would have passed Mr Castleton's email to me or informed me of its contents. In all likelihood, they

would have forwarded it to Mr Castleton's constituency MP and possibly also the private office of the relevant Minister at the time (Lord Young of Norwood Green).

49. For completeness, I should add that I am pretty sure that the visit I refer to in paragraph 43 of my first statement took place after my time as Secretary of State.

Role as Secretary of State for Trade and Industry

- 50. As explained above, I left my post as Minister for Competitiveness following the General Election on 7 June 2001. Thereafter, the Post Office was not part of any of my ministerial portfolios until I was appointed Secretary of State for Trade and Industry on 6 May 2005. I remained in that role until 5 May 2006 (at which point I was appointed Secretary of State for Education and Skills).
- 51. As Secretary of State, the Post Office was one of many policy areas that fell within my overall portfolio. Whilst I would expect to be kept generally aware of the major policy issues relating to the Post Office, the Minister (Alun Michael) and civil servants would exercise judgement about the issues that should be brought to my attention they would do so because the issues were concerning, because they could not resolve them themselves, because the issues were very significant, and so on.
- 52. As I explained at paragraph 42 of my witness statement for Phase 2, I have no recollection of Horizon issues ever coming across my desk as Secretary of State.

In preparing this statement, I have seen nothing which would cause me to doubt that recollection.

The Government's role in the Post Office

- 53. I have been asked to explain my understanding of the Government's "responsibility" for the Post Office. The answer is that the Government had political responsibility and accountability to Parliament and, in turn, to the British public for the Post Office. As Alan Milburn put it when giving evidence during Phase 2 of the Inquiry, "that's the rule of the game" (2 December 2022, p.50, line 5). As Ministers we chose to accept that responsibility and accountability and kept the Post Office in public ownership in recognition of the vital public service that Post Offices provide to communities up and down the country.
- 54. However, this does not mean that Ministers and civil servants were or should be deeply involved in the Post Office's business. Even before the Postal Services Act 2000, the Post Office operated at arm's length from government. For over 40 years, the Post Office had been a statutory corporation. Ministers and officials were not involved in the day-to-day operations of the Post Office. The Government's involvement was, and remained, at a relatively high policy and strategic level. This was explained by, for example, Dr Kim Howells, Parliamentary Under-Secretary of State for Trade and Industry, on 21 July 1999 (House of Commons 'Post Office Counters Ltd' debate on 21 July 1999) (WITN03380203):

"Since the Post Office was established as a public corporation in 1969, it has been the policy of successive Governments that decisions relating to the day-to-day running of the postal businesses, such as the contractual terms and the arrangements between sub-postmasters and Post Office Counters Ltd., are the operational responsibility of the Post Office Board and management. The Government's role in Post Office matters is confined to broad issues of general policy and to overall financial control. With a network of some 18,000 sub-post offices, it would be inappropriate and impractical for Government or Ministers to become involved in decisions or disputes relating to individual offices."

- 55. This is also evident from briefings, minutes and reports dating to August 1999 which reflect the extent to which the arm's length relationship was defended and endorsed at the time alongside a recognition that this did not entail unfettered commercial freedom (see Briefing to Mr Johnson on meeting with Neville Bain and John Roberts (BEIS0001211); Minutes of meeting with Mr Johnson, Neville Bain and John Roberts (BEIS0001212) and First Annual Report to Parliament on the Progress of the Reforms Set Out in the White Paper on Post Office Reform (BEIS0001213).
- 56. It is also clear from these documents that this was a time of transition motivated by a desire to reform. The precise nature of the arm's length relationship was to change with the reforms under the Postal Service Act 2000. This was implicit in and an intended consequence of the move to make the Post Office (and Royal Mail) a corporate entity to which the Companies Act applied and over

which the Government would be the sole shareholder. This was also explained in the White Paper and the various Parliamentary debates during the development of the White Paper and passage of the Postal Service Act 2000.

57. Chapter 5 of the White Paper dealt specifically with the nature of the arm's length relationship. "Objective 3", as described in the White Paper was "To establish clear and accountable relationships between the Government, the Post Office, the Regulator and POUNC". And paragraph 1 of the chapter explains:

"The Post Office was established as a statutory corporation by the Post Office Act 1969. The Act broadly defines the Post Office's powers and responsibilities, as well as the general responsibilities of the Government in relation to postal services. However, as the postal market has developed and the Post Office has broadened its business activities, so the boundaries between the responsibilities of the Post Office and the Government have started to look outdated. They now need tighter definition and more transparent operation. For the Post Office, this will mean clarity on those decisions and objectives which fall to the Board, rather than the Government, and for which the Board should take responsibility. For the Government, this will mean greater transparency and accountability, which is a key principle of the Government's review of utilities regulation A Fair Deal to Consumers."

- 58. The remainder of the Chapter describes the specific roles of Government and the Post Office (and also the regulator). As noted above, the White Paper was well-received, and formed the basis for the reforms enacted by Parliament.
- 59. On 7 December 1998, the Secretary of State Peter (now Lord) Mandelson stated that "The Government's role in the Post Office will be restricted to the strategic level, both on matters of commercial direction and on setting social objectives. The Post Office board will become clearly accountable for its success or failure in running the business" (House of Commons 'Post Office' debate on 7 December 1998 (WITN03380204).
- 60. This was repeated by Ian McCartney on 13 January 1999 (House of Commons 'Post Office' debate on 13 January 1999 (WITN03380205).
- 61. On 8 July 1999, the Secretary of State Stephen Byers stated "Although the Government will set out clear objectives for the Post Office, they will not be involved in day-to-day business operations. The Post Office Board will be responsible for running the Post Office, based on a rolling five-year strategic plan, which will be agreed with the Government. Clear duties, real powers and necessary resources to promote consumer interests will be given to the independent regulator and the users council. Annual reports will be published by the Government, the Post Office, the regulator and the users council on their roles and performance during the year" (House of Commons 'Post Office' debate on 8 July 1999 (WITN03380206).

62. On 17 January 2000, I summarised the reforms proposed under the White Paper:

"Under the reforms, for the first time, we will create an arm's length relationship with Government, based on a five-year strategic plan, giving the Post Office greater freedoms to develop new products and services; to price commercially; and to borrow for growth investments. For the first time, we will introduce a tough, independent regulator, the Postal Services Commission, to promote and protect customer interests, set high-quality standards, regulate prices, and promote competition and innovation. We will strengthen consumer representation through a revamped and reinvigorated Post Office Users National Council and we will put additional resources into the Post Office, more than doubling the post-tax earnings that the Post Office can keep for investment, rather than paying to government. Also for the first time, we will enshrine the universal service obligation and the single uniform tariff in law, and we will establish access criteria to protect a nationwide network of post offices." (House of Commons 'Post Office Services' debate on 17 January 2000 (WITN03380207).

63. Of course, the divide between operational and strategic can be blurred (it is really a continuum). The issue is always about the bandwidth for and wisdom in becoming involved: Ministers and officials are generally not qualified to and do not have the time to run an organisation like the Post Office (or any of the many other commercial companies of which the Government is or was shareholder, such as Channel 4, the Student Loans Company and RBS). Insofar as possible, it was obviously good sense to let the Post Office (like other government-owned).

companies) run itself, with officials and Ministers retaining the ability to step in and use the levers available to it where the context required. I have seen, and agree with, paragraphs 12-21 of the witness statement of Mark Russell (WITN00800100) where he discusses the reasons why an ALB model is suitable for organisations like the Post Office.

64. I have also been asked to what extent I, or Departmental civil servants, oversaw ShEx's oversight of the Post Office, following ShEx's formation in 2003. During my time as Secretary of State, the Post Office was overseen by the fiduciary board of Post Office Limited, which in turn was overseen by the fiduciary board of Royal Mail Group plc, with ShEx providing an additional layer of oversight on top. As Secretary of State, of course I did not and could not spend time personally overseeing the oversight work of ShEx. Given the layers of oversight within the Post Office, Royal Mail and ShEx, I would not have expected Departmental civil servants to spend a great deal of time actively overseeing the oversight work of ShEx. But in the usual way, I would have expected senior ShEx officials and other Departmental officials (including the Permanent Secretary) to escalate to the Minister any problems they were aware of in the way ShEx was fulfilling its oversight role which they were unable to resolve themselves or which they felt the Minister should know about; and I would have expected the Minister to escalate any issues to me which he was unable to resolve or felt I needed to know about. I was never informed of any concerns about the way ShEx was overseeing the Post Office (nor in the way the different fiduciary boards were fulfilling their oversight roles).

My knowledge of Horizon and related issues

- 65. I have described above what I knew about issues relating to Horizon. In summary, I was made aware of concerns about various aspects of the IT system, training and support in late 1999 and asked for roll out to be paused for these issues to be resolved. These were resolved, or were being resolved, to the satisfaction of the Post Office and, importantly, the NFSP and roll out resumed in late January 2000. Like everyone, I understood there would be occasional problems with a new IT system like this but assumed these would be resolved in a professional manner and following the roll out I was never informed of any problems that required my attention as Minister or Secretary of State.
- 66. I have been asked whether I knew about remote access. The answer is that I do not recall ever having been aware of it or of the issue ever being raised. The problem as I now understand it is not with the functionality itself but in the Post Office's denial and concealment that the functionality existed and the fact it had been used, and the absence of proper controls and record keeping.
- 67. I have also been asked whether I knew that the Post Office conducted its own prosecutions (instead of the CPS). I did not, and was surprised to learn that it did. No convictions associated with Horizon came to my attention as Minister or Secretary of State. But, again, I do not understand the problem to lie in the fact that the Post Office conducted private prosecutions; the issue is in *how* the Post Office conducted those prosecutions for example, breaching its disclosure obligations both before and after conviction. I am sure the Inquiry will consider

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whether there is a role for more independent scrutiny of private prosecutions. As

explained above and previously (with reference to the case of Pamela Lock), I

think it is scandalous that the Post Office brought proceedings in the early days

following the roll out of Horizon, when it was obvious that the new system would

take a while to bed in.

Conclusions

68. I wish something had occurred on my watch to signal what was to come and that

I could have stepped in and alleviated some of the pain that so many sub-

postmasters and -mistresses were forced to go through, but it didn't and I

couldn't.

69. I do not believe that additional layers of Government oversight could have

avoided the Horizon scandal. The Government owns some diverse businesses

- from Channel 4 to British Nuclear Fuels - and to try to run them from the centre

would be impractical and would lead to worse performance, both in Government

and in the business itself. That is not to say that, having done its work so

diligently, the Inquiry will not find mechanisms to improve oversight so that

scandals like this can't happen again, only that I can't think of any.

Statement of truth

I believe the content of this statement to be true.

Signed:

GRO

Dated:

11 November 2024

Page 39 of 42

Index to Second Witness Statement of Alan Johnson

No.	Document Description	URN	Control Number
1.	First Witness Statement of Alan Johnson	WITN03380100	WITN03380100
2.	Letter from Rachel Jenkinson to Moira Wallace, Appointment of Alan Johnson Mp as an adviser to Mr McCartney on the Post Office	CBO00100005_100	CBO00100005_100
3.	DTI Post Office Reform: A world class service for the 21st century	POL00089812	VIS00009748
4.	Alan Johnson to Harry Barnes MP dated 14 October 1999	BEIS0001205	BEIS0001205
5.	Trade and Industry Select Committee report of 21 September 1999	WITN03380201	WITN03380201
6.	Simon Lancaster letter to David Sibbick dated 4 August 1999	BEIS0001206	BEIS0001206
7.	Draft Letter and Joint Submission by the Horizon Working Group to the PIU Study on the Post Office Network	BEIS0000428	BEIS0000408
8.	Attachment to email: Minute of Meeting with Performance and Innovation Unit dated 13 Oct 1999	BEIS0000436	BEIS0000416
9.	Letter from Derek Davis to Judy Britton dated 8 November 1999	BEIS0001207	BEIS0001207
10.	PIU report "Counter Revolution: Modernising the Post Office Network" dated June 2000	WITN03380202	WITN03380202
11.	Letter from Alan Johnson to J L H Ward re letter on behalf of Modified Contract SPMs and treatment by POCL against them	UKGI00015816	UKGI026609-001
12.	Letter on Horizon Working Group meeting on 8 November. Attached is meeting agenda and minutes of Horizon working group meeting on 11 October 1999	NFSP00000066	VIS00007514
13.	Steering brief for Horizon Working Group	BEIS0000224	BEIS0000204

No.	Document Description	URN	Control Number
14.	Briefing re 'Post Office: BA Mailshot on Child Benefit Allowances' dated 24 November 1999	BEIS0001208	BEIS0001208
15.	Draft letter from Mr Johnson to Jeff Rooker MP	BEIS0001209	BEIS0001209
16.	Submission re media strategy for T&I report and secretary of state speech	BEIS0000479	BEIS0000459
17.	Letter from Derek Hodgson, Terry Deegan and Colin Baker to Alan Johnson MP re Future of the Post Office Network	CWU00000103	VIS00009907
18.	Letter from Derek Hodgson (CWU) to Johnson MP (Department of Trade and Industry) re: Horizon Working Group	CWU00000100	VIS00009904
19.	Draft letter to Horizon Working Group	BEIS0001210	BEIS0001210
20.	Attachment: Steering brief re Horizon Working Group meeting 11 October 1999	BEIS0000231	BEIS0000211
21.	Minutes of the Meeting held at 148 Old Street on 11 January 2000	POL00089772	POL-0086748
22.	Letter from David Sibbick to SoS re issues with Post Office	BEIS0000223	BEIS0000203
23.	Letter from Alan Johnson to P T Parry re: Mr G S Dhillon	UKGI00015808	UKGI026601-001
24.	Draft Letter to Anne McIntosh LLP MP from Mike Whitehead, re Geoffrey and Jean Newton's concerns from the Village Store and Post Office, Signatory Alan Johnson	UKGI00013992	UKGI024785-001
25.	Trial Bundle C: Documents in Post Office Limited v Julie Wolstenholme - Blackpool County Court	POL00118220	POL-0120140
26.	Trial Bundle C: Documents - continued - Julie Wolstenholme Employment Tribunal	POL00118221	POL-0120141
27.	Witness statement Julie Kay (nee Wolstenholme	WITN09020100	WITN09020100

No.	Document Description	URN	Control Number
28.	Email from Enquiry Unit and Night Duty office mailboxes to ShE breifing RE: [FindYouMP] post office limited/Lee Castleton	POL00165914	POL-0161358
29.	House of Commons 'Post Office Counters Ltd' debate on 21 July 1999	WITN03380203	WITN03380203
30.	Briefing to Mr Johnson on meeting with Neville Bain and John Roberts	BEIS0001211	BEIS0001211
31.	Minutes of meeting with Mr Johnson, Neville Bain and John Roberts	BEIS0001212	BEIS0001212
32.	First Annual Report to Parliament on the Progress of the Reforms Set Out in the White Paper on Post Office Reform	BEIS0001213	BEIS0001213
33.	House of Commons 'Post Office' debate on 7 December 1998	WITN03380204	WITN03380204
34.	House of Commons 'Post Office' debate on 13 January 1999	WITN03380205	WITN03380205
35.	House of Commons 'Post Office' debate on 8 July 1999	WITN03380206	WITN03380206
36.	House of Commons 'Post Office Services' debate on 17 January 2000	WITN03380207	WITN03380207
37.	Witness statement of Mark Russell	WITN00800100	WITN00800100