

**Witness Name:** Kevin Gilliland

**Statement No:** WITN10040100

**Dated:** 15 November 2024

## **POST OFFICE HORIZON IT INQUIRY**

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### **FIRST WITNESS STATEMENT OF KEVIN GILLILAND**

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I, Kevin Gilliland, will say as follows:

1. I make this statement in response to a Request for Information pursuant to Rule 9 of the Inquiry Rules 2006, regarding matters within Phases 5 and 6 of the Post Office Horizon IT Inquiry, dated 2 October 2024.
2. I am truly shocked by what has come out of the Inquiry and have spent a long time reflecting on what Sub Postmasters (“SPMs”) had to endure. I can truly say that I am horrified. I worked for the Post Office for most of my working life and I was proud to work for such a trusted brand, with my father having been a postman. With what has come out of the Inquiry, I now feel ashamed to have been part of a business where so many lives were ruined. I hope that my statement goes some way in providing answers.



3. I can confirm that I have had the legal assistance of Ashfords LLP in drafting this statement.

## BACKGROUND

4. I left school with 5 O Levels and joined Post Office Ltd ("POL") in 1979, where I had an extensive career until 2016. I cannot recall the exact dates that I held each role at POL, or the precise role titles, but from memory these roles were as follows:
  - a. **1979 – 1982: Counter Clerk** - I worked as a Postal Office Counter Clerk at the Crown Post Office in Northampton.
  - b. **1982 – 1844: Remittance Unit Postal Officer** – I worked in a remittance unit, checking and preparing cash and stock remittances received from, and dispatched to, post offices.
  - c. **1984 – 1985: Temporary Revenue Billing Task Force Manager** – At this time, all Royal Mail business customers were billed manually. My role involved going around head post offices to enter the manual records of the business customers and setting them up on the computer so that they could get automated bills.
  - d. **1985 – 1986: Assistant Regional Cash Manager** – I was responsible for collating regional overnight cash holding reports and producing Management Information Reports so that cash in Post Offices was managed and controlled.

- e. **1986 – 1987: District Customer Services Manager** – I was responsible for customer complaint handling and the monitoring and production of the region's service delivery key performance indicators.
- f. **1987 – 1993: Client Services Manager** – I was responsible for introducing new products and changes to products in the Post Office network working with the Royal Mail, Parcelforce and Bill Payment account management teams.
- g. **1993 – 1997: BT Account Manager** – I was responsible for the contract and relationship with British Telecom for bill payments and sale and acceptance of savings stamps at Post Offices.
- h. **1997 – 1998: Marketing and Partnership Development Manager, Bill Payments** – This role was established to defend POLs market share in the bill payments market in light of rival competitive retail networks being established. I had responsibility for marketing and advertising campaigns and sales and awareness training for Post Offices.
- i. **1998 – 1999: Head of Network Banking** – My primary role was to look at the potential implications and strategy development if government moved benefit payments from being paid through the Post Office, to paying them direct to bank accounts, which it subsequently did.
- j. **1999 – 2000: Head of Benefits Market** – I was responsible for account managing the Government Departments responsible for benefits payments, for example the Department of Work and Pensions.
- k. **2000 – 2004: Head of Business Requirements / Business Architect** – I was responsible for the development and implementation of Post

Office Card Account ("POCA") and the associated contract with the relevant Government Departments for the provision of this service.

- l. **2004 – 2006: Head of Franchise Relationships** – This was my first network facing role as previous roles were client facing. I was responsible for the account management of the National Federation of SPMs ("NFSP"), including annual remuneration negotiations and the management of SPM contract policy.
- m. **2006 – 2007: General Manager Multiples** – Multiples are large chains who run Post Offices, such as Co-Op and One Stop. I was responsible for the account management and sales performance of these partners and had a team of Field Managers who were responsible for sales performance for this part of the network.
- n. **2007 – 2009: Head of Agency Development** – I was responsible for developing strategic relationships with existing and potential network partners, including the NFSP, Multiples and retail trade organisations. I was also responsible for SPM remuneration and contract policy as well as the implementation and development of business tool and sales training to support SPMs grow and defend their business.
- o. **2009 – November 2010: General Manager Commercial Agency / Agency Sales Programme Director** – I originally went into this role as General Manager Commercial Agency but shortly after I took on the role, Alan Cook (Managing Director at the time) gave me the objective of restructuring the Agency Business Development managers to deliver a savings target of £4 million. This changed the nature of my role and my job title changed with it, to become Agency Sales Programme

Director. I originally applied for the role to gain experience of running a large network field team but the change in the focus of the role meant that this development was limited.

- p. **November 2010 – 2016: Network and Sales Director** – I was responsible for running the day to day operations of the network across 11,500 branches. However, it was the Network and Crown Transformation programmes that took up the majority of my time and attention. I was also given responsibility for the supply chain (the cash logistics operation) and Property from around 2012 – 2015 when Mike Young (Chief Operating Officer) left POL. When Pauline Holroyd (HR Director) left in 2012, responsibility for the Communication Workers Union (“CWU”), Communication Managers’ Association / Unite was transferred to me (in addition to my responsibility of the NFSP). In 2014 responsibility for these relationships was transferred back to HR (including the NFSP) when Neil Hayward (the new HR Director) joined POL. In 2015, Supply Chain and property were transferred from me to Al Cameron (the incoming Chief Financial Officer).
- q. **2016 – 2017: Chief Executive Officer (“CEO”) Retail** – I was responsible for product development, delivery and client account management for Royal Mail, Government services, payment services, retail and lottery. I was also responsible for the Network and Crown Transformation programmes, the network development programme, NFSP, the Crown network and line management and, agency sales field support. This role came about as a result of a reorganisation whereby my previous role no longer existed and I stepped into the position until

a suitable external replacement with retail experience could be recruited. This happened in December 2017 at which point I was put on gardening leave until June 2018 when I left POL.

5. Since leaving POL, I have carried out two pieces of consultancy work and a Non Executive Director role. I fully retired in 2022.

## **THE HORIZON IT SYSTEM**

6. When the Horizon IT System ("Horizon") was first introduced to the business in 1999, I was working in a Commercial Business Unit as Head of Benefits Market, responsible for the production development and introduction of Post Office Card Account ("POCA"). I can recall that POCA utilized the Horizon system with pin pads being rolled out as a key component of POCA and therefore my first experience with Horizon was on a practical level when trying to introduce POCA.
7. All Head Office Managers, including myself, were required to work on the counters during the Christmas period to help with the Christmas pressure. In order to carry out this role, I received training on how to use Horizon, which would have been either a half or a full day, delivered from a classroom. The training was specifically delivered for people assisting with the Christmas pressure and so it would not cover the full use of Horizon, but on how to conduct the most common and standard transactions. For example, I think that the training included daily individual cash and stock check, but not whole



office balancing procedures. Should a more complicated transaction arise during our shift, we would defer to the more experienced staff. I think that I would also have received refresher training but I cannot recall when or how often this would have been.

8. The first time I became aware of any bugs in Horizon was when two bugs were reported in the Second Sight ("SS") report in July 2013, **POL00099063**. However, I remember being reassured that these had not caused any detriment to any SPM as the bugs had been identified and corrected and I was told that no SPM was out of pocket. I cannot remember who told me this but I think that it was likely to have been delivered in an update at an Executive Committee ("ExCo") meeting.
9. Prior to this, I knew that Horizon went down from time to time and when I was Network and Sales Director, I would receive complaints from SPMs, which I have discussed in further detail below. However, these complaints never appeared to be to do with something fundamentally wrong with the system, but due to an individual issue, such as a faulty lead, as shown in **POL00145179** (email chain dated 4 July 2013), or a telecoms issue, as shown in **POL00105625** (email chain dated 11 December 2012). I have discussed these documents in further detail below.
10. My understanding was that there would always be things that would go wrong with computer systems but that these problems were minor (although could

be very frustrating to the SPM) and would always be picked up and rectified by the IT team.

11. It was only after I left POL, when I saw the High Court judgment and the subsequent findings from the Inquiry that I became aware of the lack of integrity of Horizon. These findings have completely shocked me as although I was aware of cases where SPMs were attributing losses to Horizon issues, I was always reassured that Horizon was robust, with this reassurance reinforced by the fact the issue was being looked at by a dedicated team, including IT and legal experts.
12. The Inquiry have asked me to lay out my understanding of ARQ data. It is not a term that I was familiar with and from memory, the only time that I would have had experience of it would have been in the Ferndown case (discussed in further detail below). Here, I was shown by Helen Rose how data from Fujitsu could highlight what happened in a branch, including the time and date that transactions took place. It was my understanding (and still is my understanding) that ARQ data is keystroke data which shows every entry that someone has made into Horizon and that this data could be used to look at the history of all transactions, stock and cash and identify each interaction with the system by user and stock unit. To the best of my knowledge, the only time this term came up was in the Ferndown case meeting when Helen Rose walked us through the relevant branch data to show us what transactions had taken place in that particular branch and who had conducted them.

13. Throughout my time at POL it was my understanding that there could be no remote access by Fujitsu employees to alter transaction data or data in branch accounts without the knowledge or consent of SPMs.
14. I knew that transaction corrections could be made by the central POL team in the Chesterfield office but that SPMs were always aware when these were issued as they had to accept them.
15. This message is in line with **POL00294728**, an email from Tracy Marshall to myself, Angela Van Den Bogerd and Helen Rose in the late afternoon of 5 January 2011 which states that:

*"Fujitsu can remotely access systems [but] the authority process required and the audit process are robust enough to prevent this activity from being undertaken fraudulently...so although changes could be made remotely, they would be spotted and the person making the change would be identified."*

16. Similarly, the briefing note for the meeting, **POL00142625**, states

*"Any technical changes by Fujitsu that impact the system have to go through clearance processes which would prevent any amendment to existing data"*

17. It is clear that the documents state that Fujitsu did have access but that there were strong controls in place which prevented Fujitsu from remotely



accessing and amending any transaction data. This is not in line with my recollection on remote access prior to these documents being disclosed. From my recollection, until 2016 I believed that Fujitsu did not have any access. This changed around 2016 when Jane MacLeod informed ExCo that Fujitsu did have access, but that this was controlled. I can recall myself and others being shocked at this change in message and it is clear to me now that the information provided on remote access in January 2011 (referred to in the paragraphs above) did not register with me. I am confident that if it had, I would have questioned the message that Fujitsu did not have any remote access and this would have been investigated straight away as I understood it was in 2016.

18. Since leaving the business and following the findings of the Inquiry I now know that Fujitsu did in fact have uncontrolled remote access to Horizon. At no point during my time within the business did I ever know this.
19. The Inquiry have asked me about **POL00041564** which is a Computer Weekly article entitled '*Bankruptcy, prosecution and disrupted livelihoods – Postmasters tell their story*'. The article is dated 11 May 2009 which was before my time as an executive team member of POL and I was not party to any discussions about it. Indeed, I cannot remember seeing it or even hearing about it at the time of its publication and I think that the first time I read it was when it was provided to me in my disclosure pack by the Inquiry.

20. The Inquiry have also asked me about **POL00026572**, which is a report written by Rod Ismay, Head of Product and Branch Accounting entitled '*Horizon – Responses to Challenges Regarding Systems Integrity*' dated 2 August 2010. Again, this was before my time on the executive team and I am not copied in as an original recipient of the report. Whilst I cannot remember if I ever read the report, or my original reaction to it, I believe that if I did it would have strengthened my confidence in the Horizon system as it makes clear that "*Horizon is robust*".

## OPERATION OF POL AND HORIZON

21. I have been asked to summarise the nature and extent of my involvement with, or oversight of, POL's provision of advice and assistance to SPMs in respect of disputed shortfalls in branch accounts. In answering the Inquiry's questions on this topic I have reviewed the documents listed below, which date from 2004 – 2013. Please see the section 'POL's response to complaints from 2014 onwards' for concerns with Horizon that were dealt with after this date.

- a. **POL00444612** (Email chain dated 29 July 2004)
- b. **POL00363086** (Email chain from Victoria Noble to me on 4 July 2005)
- c. **POL00326693** (Email chain dated 25 July 2005)
- d. **POL00015020** (Email from Maureen Moors to me dated 20 May 2010)
- e. **POL00403835** (Post Office Ltd Internal Review of Agents Processes in Managing Suspected Financial Irregularities, dated 17 January 2011)

- f. **POL00434015** (Email from Christina Wood to me on 25 February 2011)
  - g. **POL00405605** (Email chain dated 17 May 2011)
  - h. **POL00338648** (Email chain dated 20 February 2012)
  - i. **POL00105625** (Email chain dated 11 December 2012)
  - j. **POL00184326** (email chain dated 13 December 2012) and attachment **POL00184327** (letter from Ronnie Campbell MP to NFSP dated 6 December 2012)
  - k. **POL00316792** (Email from Jane Hill dated 5 June 2013)
  - l. **POL00145179** (email chain between myself, branch investigator and others, dated 4 July 2013)
  - m. **POL00099179** (Email chain between SPM David Woodrow, Paula Vennells, myself and others, dated 12 July 2013)
  - n. **POL00298435** (Emails between SPM Pervez Nakvi, dated 21 August 2013)
22. Prior to my role as Network and Sales Director (from November 2010) I only had very peripheral involvement with concerns raised about Horizon, with the documents listed above only showing my involvement on three occasions.
23. The first of these, **POL00444612** shows me copied into an email chain dated 29 July 2004. I cannot recall this email chain but reading it now, it appears that Mandy Talbot (Royal Mail Group Legal), has asked John Legg (Agency Contract Manager) to suggest someone who is able to produce a statement compiling a list of the types of goods and services supplied by SPMs. John

suggests to Mandy that the people best placed to supply this information would be someone from the retail line or audit manager. However, he states that he is about to go on annual leave for two weeks and suggests a number of people who may be able to help in his absence including Chris Howard (Agency Pay Manager). I assume that he has copied me in because at the time I was Chris and John's line manager. Neither John, Chris or I were part of the retail line or audit teams. I do not recall what happened following this email chain.

24. The second of these, **POL00363086**, is an email chain from Victoria Noble (Head of Product and Branch Accounting), forwarding information on what was known as the '42 day issue'. The email explains that this is an issue where the transaction correction process means that instead of an error notice, a branch will receive an electronic transaction correction at the branch which the SPM will be expected to 'action' before they are able to roll over the monthly branch trading. The SPM will be given a number of options and if they do not action any of these options, then they cannot roll into the next period. As Horizon only holds data for 42 days, this means that there is a "*slight risk*" that the SPM may find Horizon becoming unstable and unable to maintain service (hence the 42 day issue). I am copied in because a meeting was going to be held with the NFSP about this issue and, at the time, I was responsible for the relationship with the NFSP and so would have facilitated, although not necessarily attended, this meeting. I believe the meeting would have been led by Victoria Noble. I also had responsibility for the NFSP as Network and Sales Director and so from time to time the NFSP would bring

relevant documentation and correspondence on Horizon to my attention for information or action as seen in **POL00184326** (email chain dated 13 December 2013) and attachment **POL00184327** (letter from Ronnie Campbell MP to NFSP).

25. **POL00326693** is an email chain dated 25 July 2005 where my advice is sought as to the contractual arrangements around what happens if a branch fails to roll branch trading at the appropriate time. At this time, I was Head of Franchise Relationships and had responsibility for SPM contracts. The contracts were already in place, but my role was to advise on what was contained in them from a business point of view. This question was about the Franchise Agreement with my advice sought as to what the contract said about SPM responsibilities in respect of disputed shortfalls. I cannot recall this discussion beyond what is contained in this email chain.
26. When I became Network and Sales Director I started to be more involved with concerns that were raised about Horizon although I recall that from around 2010 onwards, when the pre-litigation started, there was a process in place to centralise all Horizon-related concerns, which were dealt with by Group Legal, POL Legal and subsequently Project Sparrow and the dedicated teams that were set up to investigate and review cases.
27. Although I was not aware of all concerns raised, I would be informed of high value / high profile concerns. For example, I was notified when an audit revealed a shortage of £38,477.70 as at **POL00015020** (email from Maureen



Moors to me dated 20 May 2010) and when an audit revealed a shortage of £46,314.48, as at **POL00434015** (email from Christina Wood to me dated 25 February 2011) because the losses were so large. I cannot recall if there was a threshold loss amount above which I would be informed. Similarly, I am copied into **POL00105625**, an email chain dated 11 December 2012 concerning an ongoing issue with Horizon crashing multiple times a day over the Christmas period due to an issue with 'Talk Talk'. If a concern was particularly important, Paula Vennells might ask me to have oversight of it, as shown in **POL00099179** (email chain dated 12 July 2013) where Paula asked Susan Crichton and myself to look into a complicated case concerning payment of Scottish ATM rates. Similarly, I was blind copied into **POL00298435**, Paula Vennells' emails to SPM Pervez Nakvi dated 21 August 2013, who contacted her directly about a Horizon issue. I would have been copied in not to take action but so that I was aware of the issue.

28. I took a hands on approach to my job and as often as I could, I would attend SPM meetings and NFSP branch meetings where any members could attend. At these events I would often give out my mobile phone number so that SPMs could contact me direct if needed, for example if they wanted to escalate a problem to me because they were not getting the response they needed from the business. I found it to be a really useful way to receive early warnings of any potential problems within the network and how these were affecting SPMs. Such an example of a SPM contacting me is shown in the email chain dated 17 May 2011, **POL00405605**, where a SPM raised a concern with me

about a LINK issue and I was able to forward it to Rod Ismay for resolution (Head of Product and Branch Accounting).

29. Another example of a SPM contacting me direct to raise a concern is in the email chain dated 4 July 2013, **POL00145179**. From what I recall, the SPM contacted me because she had an Outreach kit which kept failing and for a long time, it was not properly fixed. Every time that she contacted Fujitsu and they thought the problem had been resolved, they would close the call log meaning there were no records to show that this was a recurring issue. In the end, the problem ended up being a faulty lead in the SPM's equipment but I fed back the problem of the call logs to Lesley Sewell (Head of IT) so that a new process could be put in place to prevent call logs being closed so that Fujitsu had better visibility of ongoing problems.
30. I would also go out on branch visits where SPMs could raise issues with me that I would report back to POL, as shown in **POL00338648** (email chain dated 20 February 2012). I think it is important to stress that most of the concerns SPMs raised with me were operational issues, not issues with losses on Horizon which, wrongly and to my deep regret, reinforced my belief that the system was working as it should.
31. Anyone within POL could escalate a problem with Horizon. The primary route for problems with Horizon was through the NBSC (POLs helpline) or the Horizon service help desk. The help desks had a tiered system for escalation and if a SPM was account managed, they could escalate issues through their

field manager. Other forms of escalation included SPMs writing direct to a Director in POL. Names and job titles of all Board members and the Executive were published on POL's website. In some instances SPMs would write to their MPs who would contact POL on their behalf. My understanding was that any problems concerning Horizon would ultimately be reported to the IT team who would involve Fujitsu as required.

32. Prior to the publication of the SS report, I do not recall being made aware of anything which made me concerned that the advice and assistance available to SPMs was not adequate, although there may have been the occasional ad hoc complaint which would be usual in an operation of this size.
33. It was only when SS published their interim report that issues with advice and assistance provided to SPMs came to light. I felt that POL took this very seriously and set up the Branch Improvement Programme to look at all of the recommendations from SS. I have discussed the Branch Improvement Programme in further detail below.
34. I was not involved in any of the development, delivery or oversight of the Horizon training, either for its initial roll out or for any later versions. However, as Network Sales Director I had oversight of training and from memory, this was delivered by Field Support Advisors ("FCAs"). Separately, there was also a team responsible for general classroom training which also sat in my directorate. Although I had oversight, I was not involved in training on a day-to-day basis. If there were any issues that needed bringing to my attention, I



would expect these to be escalated to me by my direct report. Similar to above, I cannot recall training ever being raised as an issue at any of the events I attended with SPMs and I cannot recall it being raised by any of my direct reports. It was only when SS published their report that I became aware of the issues.

35. When I became Network Sales Director in November 2010 I had oversight of the Branch Audit Team. Angela Van Den Bogerd (Head of Network Services) had direct responsibility of the team until August 2012 and she reported to Sue Huggins (General Manager Network, Sales and Transformation), who was a direct report to me. Following a restructuring of the SPM field support teams around December 2012, Michael Larkin (Head of Agency Network) who was another of my direct reports, took over responsibility for all the agency support field teams including the Audit team, with Sue Huggins leaving POL. In September 2012 when Angela moved to a new role, I believe Drew McBride replaced her and reported to Michael.

36. Although I had general oversight of the audit team, on a practical level, I had very little involvement with audits. I believe I received a monthly report which covered high level information such as the number of audits that had been carried out and if there were any large discrepancies. I think there was also a quarterly report that went to the Audit and Risk Committee ("ARC"). The audits would be formally scheduled and I did not receive the results of individual audits as these would go direct to one of the Contract Managers who would decide, based on the evidence they heard, what (if any) action to

take, based on the audit findings. I had monthly one to one meetings with my direct reports where any issues that I needed to be aware of could be raised with me or they would raise more urgent issues with me at anytime.

37. I was involved in internal audits where they covered my areas of responsibility, such as **POL00086765** (Network auditing approach, methods and assurance dated 1 January 2013). This gave a low assurance score and would have indicated to me that the processes in place were not currently adequate and provided areas for improvement. I cannot recall exactly, but from memory the usual process in response to internal audits would have been as follows. The findings of the internal audit would be discussed and agreed with the senior managers responsible, Drew McBride for the SPM Network, Roger Gale for the Crown Offices and then me as the Executive Sponsor. I believe the agreed recommendations and action plans would then be approved by the Executive and ultimately the ARC, where progress would also be monitored. **POL00086831** is an options paper dated 1 October 2012 setting out options for the ExCo and the ARC to consider in respect of the approach to internal audits (as opposed to branch audits), including an outline of the findings and issues arising from the detailed review of auditing work undertaken by the Field Support Advisors within Network Operations. I have not been given any documents that show the outcome of the discussions at ExCo or the ARC but I seem to recall that the option of separating the branch audit and training functions was not felt to be an appropriate course of action to take at this time because it would cause quite a lot of disruption particularly as this team had been expanded to support the Network Transformation

programme. I do however, think that the other recommendations would have been accepted and delivered either through business as usual and/or the Branch Improvement Scheme, although I cannot say for definite.

38. **POL00379712** is an email from Peter Wilkinson, Area Manager, dated 8 January 2013 sending me an audit report, **POL00379713**, dated 12 December 2012 from Pulborough which shows a shortage of £19,669.53. Although I cannot remember this specific case, I understand that the branch was audited because it was identified as a risk because it was reported as holding too much cash for the size of the branch. **POL00179484** (Financial Branch Performance Profile trial results dated 14 March 2012) is an example of how we were trying to make branch audits more effective and targeted by taking more of a risk based approach. We were trialling revised profile audits to increase the efficiency of detection levels and also earlier detection of losses. Similarly, through the Branch Improvement Programme a key aim was to detect losses before they got large and provide support and help to these SPMs.

39. As Head of Franchise Relationships I was responsible for SPM and Franchise contracts and so would sometimes provide advice on what the contractual requirements were following a dispute, as shown in **POL00326693** (email chain dated 25 July 2005). Other than this, I cannot recall having any involvement with or oversight of POL's procedures for resolving disputes with SPMs in respect of discrepancies in branch accounts.

40. When I came into the role of Network and Sales Director I would sometimes have involvement in cases concerning branch discrepancy disputes that went through to the Executive Correspondence Team (discussed in further detail below). However, I believe that it was primarily the role of the Financial Services Centre ("FSC") to deal with disputes with SPMs in respect of discrepancies in branch accounts. The FSC reported into the Finance function.
41. The Inquiry have disclosed **POL00403835**, entitled '*Post Office Ltd Internal Review of Agents Processes in Management Suspected Financial Irregularities*'. This is dated 17 January 2011 and was drafted by Tracy Marshall. I do not remember this document or why this process was being reviewed. However, in November 2010, shortly before I became Network and Sales Director, there was a restructuring of the Network Development and Outlet Support Teams with the two teams merging to become one, headed up by Sue Huggins. Whilst I cannot say for sure, this restructuring may have been a catalyst to review the policies relating to the Outlet Support area managing financial discrepancies.
42. I have been asked to set out my knowledge of POL's prosecutorial function, in particular its use of Horizon data to pursue prosecutions against SPMs. Apart from receiving general updates about prosecutions, such as those contained in **POL00303045** (Significant Litigation Report dated 1 February 2013), I had very little knowledge as to how the prosecutions worked in practice as these fell under the responsibility of POL Legal (and Royal Mail Group Legal prior to

2012). I completely trusted my professional peers and it was my understanding that full evidence, including Horizon data, where necessary, would be gathered and considered to ensure that every consideration was given prior to prosecution. I also believed that the Courts would check and test that the evidence was accurate and I took comfort that lawyers had control and oversight of prosecutions.

43. As referenced above, from around 2010 onwards, when the pre-litigation started, I believe there was a process in place to centralise all Horizon-related concerns, which were dealt with by the Legal team and subsequently Project Sparrow. I did not have any direct involvement in this but I might be asked, from time to time, to gather information. I have discussed this in further detail below under the section 'Shoosmiths litigation and 2011 media coverage'.

## **FERNDOWN**

44. The following deals with my recollection of an interview held at Ferndown Post Office on 6 January 2010. I was asked to become involved in this case when I was in the role of Head of Agency Sales / Agency Sales Programme Director. This was a high profile case that involved both Dave Smith (Managing Director at the time) and Paula Vennells (Network Director at that time). I believe that Paula approached me to ask if I would try to resolve the problem because the SPM had had her contract terminated and it was attracting a lot of media attention and she thought that POL's reaction was disproportionate in relation to the discrepancy. I was brought in to try and understand what had



happened and to try and resolve the issue with a fresh pair of eyes. At the time, I had no experience with the audit and training team and so I think Paula thought I would be a good person to get involved as I could be objective. This was the first and only SPM interview that I was ever involved in.

45. Lynn Hobbs (General Manager Network Support) had oversight of the branch audit function and had been asked to review the case so I started by speaking to Lynn. She explained that matters had escalated because Mr/Mrs Athwal were no longer allowing the branch to be run by the temporary SPM and therefore the branch was closed. Lynn had discovered that there were Priority Mail items and a passport application locked in the safe and Mr Athwell was refusing to release the items. He said that he would not allow the branch to reopen until his wife had been reinstated. I phoned Mr Athwell to try to get him to release the mail and passport form and reopen his branch but he refused. Lynn and I then discussed the situation with Dave Smith (POL Managing Director). Dave's view was that unless the situation could be resolved in the next two working days, we should reinstate Mrs Athwell so that we could get the Mail and passport form. Lynn and I concluded that under the circumstances we should reinstate. We cleared this with Paula Vennells who agreed with the approach and cleared this with Dave Smith. I spoke to Mr Athwell again and informed him we would reinstate his wife and requested his wife to meet with me and others within POL so that we could try and understand what had happened and get the relationship back on a positive footing. Mr Athwal agreed and I said that I would write to his wife to set up the

meeting. **POL00294717** is the letter from me to Mrs Athwal sent on 6 December 2010.

46. Between this conversation and the interview taking place, I moved into the role of Network and Sales Director. I would not have been involved in the preparations and setting up of the meeting or who the POL attendees should be because I didn't have the background, knowledge or experience in this area. By this time, Sue Huggins, (General Manager Network Services and Transformation) had now taken responsibility for this area and was a direct report to me. I would have asked Sue to make the preparations and arrangements for the meeting. However, Sue was on annual leave for the meeting and Angela Van Den Bogerd deputised for her in this role (at this time Angela was responsible for the Branch Audit team and was a direct report to Sue). I can see from the papers, **POL00294705** and **POL00294707**, that ahead of the meeting, on 3 January 2011, Tracy Marshall emailed Angela Van Den Bogerd and myself with details of the background to the case and a meeting was held ahead to discuss the case, with a Briefing Paper, **POL00142625**, provided. Late in the afternoon, the day before the meeting Tracy Marshall also sent **POL00294728**, an email to myself and Angela Van Den Bogerd with information on Horizon Network Performance, POL or Fujitsu having remote access to individual horizon systems and the independent review of Horizon system integrity. I have seen a copy of an undated briefing note, **POL00294706**, which appears to have been prepared in advance of the meeting.

47. The meeting was held on 6 January 2010 with Angela Van Den Bogerd (Network Change Operations Manager), Helen Rose (Tactical Analyst, Security) and myself from POL, Mr and Mrs Athwal and Mark Baker (representative from NFSP). It was my role to lead the meeting but I had little operational experience in this area and so it was important that Angela was there, as she had a deep understanding of the operation of branches, and that Helen was there, so that she could speak to the technical aspects of the Horizon logs.
48. A record of the meeting is at **POL00294743** (interview notes dated 6 January 2010). Following the meeting I requested branch data from Fujitsu to be sent to Mrs Athwal via discs as requested by her in **FUJ00224980** (email chain dated 10 January 2011). There is an email chain which shows that Mrs Athwal sent a letter around a month later, on 15 February to which Fujitsu drafted a response, **POL00294761** (email from me to Angela Van Den Bogerd and Peter Johnson on 17 February 2011). I ask to hold off our response until we have spoken to Legal. My recollection was that whilst we could not come to an agreement in the meeting, we all agreed that we would put the matter behind us and that there would be no recriminations. This recollection is in line with Angela's email which says

*"It's interesting to see the list of questions posed by Mr Athwal given that we'd agreed to wipe the slate clean and move forward."*



49. My recollection of the meeting itself was that with the use of the Horizon logs, Helen presented evidence of how the disputed loss was put into a dormant account and she was able to identify who made the transfers and at what time and date, which confirmed to me that the disputed entries were entered by the people working in branch. Both Angela's and my response in **POL00294761** (email chain dated 17 February 2011) were based on the complete belief that Horizon was robust.

50. It is only now, following the information which has come to light in the case of Mr Bates and Others v Post Office Ltd, as well as the Inquiry, that I am able to properly reflect on the information provided at this interview concerning both the integrity of Horizon and the ability to add or amend transaction data. At the meeting, I had complete belief that Horizon was robust and thought that the information provided was correct.

51. The issue of Horizon's robustness and remote access was covered in the briefing paper **POL00142625** (undated) which states:

*"POL cannot remotely control a branches system...Any technical changes by Fujitsu that impact the system have to go through clearance processes which would prevent any amendment to existing data"*

52. An email sent by Tracy Marshall the day before the meeting, on 5 January 2011, at **POL00294728** also states:

*“POL cannot remotely access systems and make changes to specific stock units etc. Fujitsu can remotely access systems...technically, Fujitsu could access an individual branch remotely and move money around however this has never happened yet. The authority process required and the audit process are robust enough to prevent this activity from being undertaken fraudulently”.*

53. In the interview, I say that POL cannot manipulate data and Angela Van Den Bogerd says that Fujitsu cannot manipulate data *“without being seen to have done that”*. Since leaving POL I now know that this is incorrect, and Fujitsu had uncontrolled access to branch accounts.

## **BBC INSIDE OUT**

54. When I was on the Executive team I was often copied into emails on high profile matters. **POL00294745** (email from Paula Vennells to me and others on 26 January 2011), **POL00294746** (email chain dated 27 January 2011), **POL00120451** (email from Mike Granville to me on 4 February 2011) and **POL00294779** (email from Susan Crichton to me and others on 18 February 2011) are all examples of such emails, updating me and the team on the BBC Inside Out programme and what POL’s response to the programme was. This was the extent of my involvement as I would not have been involved in actually formulating the response but merely kept up to date on POL’s position.

55. As I was not a member of the Board I do not feel able to comment on their views as to the reporting.

## **SHOOSMITHS LITIGATION AND 2011 MEDIA COVERAGE**

56. My only involvement in POL's response to litigation threatened by Shoosmith / Access Legal was to provide information as and when required to feed into a particular case. For example, Legal might contact me with the background of a case and ask for network-related information, as shown in **POL00056782** (email dated 26 August 2011). I would either be able to answer the questions, or refer them to the best person placed to answer these questions.
57. As shown at **POL00379142**, on 19 November 2010, Seema Misra's husband copied me and others into an email he had sent to Amnesty International asking them to help his wife, following the outcome of the Court Case and her (wrongful) imprisonment. Paula Vennells asked me, Susan Crichton (General Council) and Sue Huggins (General Manager Network Services and Transformation) to look into this. Sue Huggins and I took a decision not to reply because the POL recipients were only copied in to the email and this was not a matter that we could assist with. This was clearly the wrong decision and even though at the time we believed (wrongly) that there had been a fair trial and I do not know what we could have done at that stage given she would have needed to appeal her conviction, it is still no excuse for not responding and seeing whether there was any particular support or assistance, which would have helped her and her family at such a distressing

time for them. I deeply regret this and offer my unreserved apology to them and their family. **POL00379142** shows that on 1 and 2 of December 2010, Mr Misra emailed me and others in POL asking us to help his wife in prison. Sue Huggins replied on 3 December suggesting that he takes up some of the issues directly with the prison service and that the matter is out of the hands of the Post Office. This email response was inappropriate and we should have offered more help and support. Mr Misra wrote to the prison service again on 7 December 2010 copied to myself and others in POL, **POL00379142**. I can see from the email chain that we chose not to reply. We should not have chosen to leave the matter solely to the prison service. I am truly and deeply sorry that we didn't.

58. On 8 February 2011, following the BBC programme into Horizon, Mike Granville emails myself and others saying:

*"In terms of next steps on the issue (for example the threatened civil legal challenge by Shoosmiths that was mentioned in the programmed), I'll liaise with Kevin Gilliland, Susan Crichton and Mike Young" - **POL00294749**.*

59. I think that Mike's reference to liaising with me, Susan and Mike was in order to cover the areas of Network, Legal and IT Fujitsu respectively.

60. I can also see that on 24 November 2011 I was copied into an email, **POL00338518**, to keep me informed of POL's response to a BBC programme which was being run on Horizon.

61. I was not involved in formulating POL's strategy in responding to the Shoosmiths litigation and I cannot remember being informed of it other than as seen in the email from Mike Granville (Head of Regulation Strategy) dated 26 November 2010, **POL00120561**, which states, in respect of legal cases relating to individual SPMs being prosecuted for theft / false accounting, *"our approach throughout has been to robustly defend the integrity of the Horizon system."* The email concerns Mike Granville asking for views on a statement that he intends to send to the Department for Business, Innovation and Skills ("BIS") on Horizon issues. I think that I had only just started my role as Network Sales Director when this email was sent and cannot remember having any further involvement.
62. On 20 October 2011, the business received instructions from Legal, **POL00176465**, in respect of document creation, including around legal privilege -. Angela Van Den Bogerd and Sue Huggins were recipients of this email and it was their teams within the Network to whom the instructions in this email were applicable, so my assumption is that they would have followed these instructions and forwarded the email onto their teams. I would not have questioned these instructions and I do not believe any of my team would have either would have either as none of us are legally trained. As I was not involved in the litigation, I do not feel it is for me to say whether those instructions that we received were driven by POL trying to prevent the disclosure of documents so that it could prejudice its position in relation to Horizon.



63. I have been asked to consider **POL00294896** (email from Rod Ismay to Paul Meadows and others on 14 October 2011) and attachment **POL00294897** (Request for Delegated Authority as regards costs of Legal Action 14 October 2011).
64. From reading the email and its attachment, Rod Ismay has drafted a proposal around the legal action and subsequent legal costs in defence of challenges made by Shoosmiths. All projects needed to have an Executive Sponsor and Rod has referenced that he is going to have a call with me to discuss my thoughts on sponsoring it. I cannot remember having such a call and to the best of my recollection, I never sponsored this project or any similar one. My name is shown in square brackets in the proposal and my assumption is that it is a draft. I have not been disclosed a final version of the proposal from the Inquiry and so am unable to comment on if this ever went ahead and, if so, who sponsored it.
65. I was not a Board member and therefore am unable to comment on what steps any Board members took in relation to the Private Eye Article about the Horizon issue other than what is referenced in the disclosure - **POL00338392** (email from Mike Granville to me on 21 September 2011), **POL00363235\_050** (email from David Simpson copied to me on 12 October 2011) and **POL00294969** (email from Paula Vennells copied to me on 27 October 2011).

66. I have been asked to describe my views as to any steps taken within POL as at late 2011/early 2012 regarding the potential of litigation against POL from SPMs. Legal was completely outside of my area of expertise and so I do not feel able to comment on the approach but personally, I would follow their instructions and I thought that it was sensible that Royal Mail Group were taking a lawyer led approach in light of the potential litigation. From memory, after litigation was threatened, I believe all correspondence on Horizon was to have oversight by Royal Mail Group and POL Legal so that there was a coordinated response and teams started to be contacted by Legal to collect relevant documents. I also think Mike Granville may have been a point of contact within POL with regard to the potential litigation although I can't be sure.

67. The Inquiry have asked me about **POL00378468** (email from Eunice Kirby forwarding emails between me, Rod Ismay and Mike Granville dated 18 March 2011). From recollection, as mentioned in the paragraph above, we may have been asked to notify Mike if we received any information which was relevant or potentially relevant to the litigation. I therefore wrote to him, flagging a case which demonstrated that the process for inputting transactions was complicated which could lead to SPMs making errors, as had happened in this situation. Although I cannot remember, from reading the email, the complaint had been dealt with but I forwarded it to Mike as I thought that it was an example of where our processes needed to be improved, and for which we could be criticised. I do not know what TV reports I am referring to. Cases such as these strengthened my belief that there was not an issue with

Horizon's integrity, but the issues stemmed from the fact it could sometimes be difficult to use, resulting in human error.

68. The Inquiry have asked me to provide my reflections on the learnings shared by Angela Van Den Bogerd and Dave Pardoe on past cases, including Ferndown, as noted in **POL00294869** (memo from Rod Ismay to me and others on 12 October 2011). My reading of the document is that it does not say what the learnings are, but merely says that Dave and Angela would deliver key learnings at the first Steering Group meeting. I was not at the meeting and do not know what these learnings were. In fact, I do not know if this proposed Steering Group was ever established and I have no documents to show what happened next.

## MONITORING OF HORIZON

69. In answering the Inquiry's questions on this subject, I have reviewed the following documents:
- a. **POL00030217** (E&Y Management letter for the year ending 27 March 2011)
  - b. **POL00294829** (Terms of Reference from Stephen A Collins sent to me and others on 5 August 2011)
  - c. **POL00294906** (Email from Paula Vennells on 20 October 2011)
  - d. **POL00029114** (POL Draft Review of Key System Controls in Horizon dated 1 February 2012)



- e. **POL00030482** (POL Review dated March 2012)
- f. **POL00339056** (email from Dave Hulbert to me dated 6 May 2012)
- g. **POL00129915** (Outputs of the Fujitsu Services Review of Horizon Online, dated 1 May 2012)
- h. **POL00339652** (email from Lesley Sewell to me dated 9 September 2012)
- i. **POL00114269** (POL Board Noting Paper- Horizon Evolution Update dated 19 September 2012)
- j. **UKGI00018115** (POL Board - Risk and Resilience Review dated September 2012)
- k. **POL00184071** (Minutes of the Network Transformation Programme Board 21 November 2012)
- l. **POL00029713** (POL Assurance Review December 2012)
- m. **POL00340338** (Assurance review dated 1 March 2013)
- n. **POL00144659** (Assurance review dated 1 May 2013)
- o. **POL00380822** and attachment **POL00380823** (POL Follow Up Review of Key System Controls in Horizon dated 24 May 2013)
- p. **POL00162189** (Email chain dated 3 June 2014)

70. I had very limited knowledge of Horizon from a technical perspective as my knowledge of it was from a business perspective. I therefore do not recall the full extent of what systems were in place for testing, monitoring and auditing Horizon, other than to believe that it was tested and monitored and that there were both internal and external audits. As shown by the documents above, I was on the circulation list for emails concerning Horizon's monitoring,

although these were of a technical nature. If anything important was of note, I would have expected this to have been picked up by the IT team and flagged to the senior team within POL.

71. The document **POL00030217** shows me that in March 2011, POL commissioned EY to have a look at POL's internal systems and controls, in order to have their accounts signed off. From memory this was an annual review for the accounts to be signed. EY's report covers Horizon (back end) user administration. I have also been disclosed a Terms of Reference from August 2011, **POL00294829**, which shows that POL carried out an internal audit to review Horizon System Controls, which was being prepared in contemplation of litigation. It would seem that was done in response to EY's report, following which POL implemented the recommended actions and carried out its own internal audits to check outstanding actions against the action plan (**POL00029114** (February 2012), **POL00030482** (March 2012), **POL00029713** (December 2012), **POL00340338** (March 2013) and **POL00144659** and **POL00380822** (May 2013)). Reports such as these would have given me reassurance that Horizon was being reviewed and monitored internally and externally.
72. The documents disclosed also show Board papers, including **POL00129915**, a paper dated 1 May 2012 informing the Board of the action being taken to identify the cause of four significant incidents in the branch network, **POL00114269**, a POL Board Noting Paper on Horizon Evolution dated 19 September 2012, which provides an update on the findings and activities

being taken in response to a KPMG Risk and Resilience report, **UKGI00018115**, dated 1 September 2012. I was not a Board member and do not recall if I would have received a copy of these papers or an update on their content.

73. I can see at **POL00294906**, that on 20 October 2011 Paula Vennells has emailed Lesley Sewell, copying me in, asking for confirmation at to the robustness / reliability of Pintest. I do not recall what Pintest was but the email shows me that I have flagged it might be something that the BBC are picking up on.
74. On occasion, if it affected the operation of the network, I may have more involvement in issues with Horizon. For example, on 6 May 2012, Dave Hulbert writes to me updating me on a Disaster Recovery Test which was being carried out, **POL00339056**. Dave was keeping me informed how the test was going and notified me that whilst there had been, *“no issues for branches or customers – they’re not writing to the database correctly”*. He explained that to correct the problem he would need to cease the service to branches 45 minutes earlier than scheduled to ensure that it did not impact on the following days trading (the test was carried out on a Sunday because it was the quietest trading day). I asked a number of questions about the process involved and was provided reassurance as to the processes for ensuring data integrity.

75. As shown at **POL00339652** (email from Lesley Sewell to me dated 9 September 2012, I can also recall raising a complaint that I did not think Fujitsu were adequately logging issues raised by SPMs, as one SPM was having a repeat problem which Fujitsu were logging as a new issue every time, meaning the SPM had to repeat their explanation of the issue every time she called and there was a failure for Fujitsu to recognise it was an ongoing issue. Another topic concerning Fujitsu's support is noted in **POL00184071**, the Network Transformation Board meeting minutes of 21 November 2012. Part of the Network Transformation programme was about increasing the opening hours of branches to meet customer demand and match what our competitors were offering. We therefore needed to extend the hours of Fujitsu's support in line with this, and in order to establish how much support was required, we were seeking to obtain data about what the branch demand was for Fujitsu support outside core hours. In June 2014, there was a move of the Horizon Service Desk from Fujitsu to Atos which involved a lot of prior testing and monitoring before it was implemented. As shown in **POL00162189** (email chain dated 3 June 2014), I was involved in this because of any potential impact to the branch network .

76. I did not have any knowledge or involvement in relation to the preparation of the EY Report. I cannot remember reading or discussing the EY report after it came out, but this is not to say that I did not. As can be seen from the report, it was technical and I believe that I would have relied on the Chief Financial Officer and Chief Operating Officer to explain the report and any business implications. As noted above, following the report, POL carried out its own

internal review followed by internal audits to monitor the outstanding actions and I think I would have taken comfort from the fact POL had commissioned an external report and were taking action following its recommendations.

Terms of Reference for this internal review dated 5 August 2011 at

**POL00294829.**

77. The Inquiry have asked me about **POL00143600**, an email chain dated 9 September 2012. This is linked to **POL00339652**, another email chain from the same date which I have mentioned above. From my recollection, a SPM had got in contact with me because she was having problems with a Horizon terminal at outreach locations. This was where Horizon was set up in locations where there was not a Post Office, such as a village hall. The SPM was having ongoing issues which she would raise with Fujitsu, who would get the service up and running again and then close the call log. When she rang them again, they would not have any record of her previous calls meaning she had to explain the problem again and Fujitsu were not recognising the length of time this was going on and therefore they were not getting to the root of the issue or registering the true length of time the problem had been going on for. The problem ultimately turned out to be a faulty cable. As shown in **POL00143600**, I reported this issue back to Lesley Sewell, who in turn reported it to Dave Hulbert stating:

*"When I met with Kevin his concern was more broad – he is worried that because the issues at the branches get raised and then closed that we're not*



*seeing the bigger picture. And that we may have something systemic that we can't see."*

78. Here, Lesley is passing on my comments of frustration that Fujitsu do not have good case management where call logs are logged together, meaning the way they log calls stops them from seeing the full picture and get to the root of the issue in a more effective and efficient way.

## **ENGAGEMENT WITH MPS IN 2012**

79. On 15 December 2011, Lord Arbuthnot sent a letter to Moya Greene (CEO of POL) about software issues at Odiham Post Office in Hampshire to which I respond on 12 January 2012 (both letters at **POL00105483**).
80. When correspondence from MPs came in, it would be dealt with by the Executive Correspondence team who would gather all of the background information from the relevant teams within POL and then produce a draft letter with a background sheet as to what, why and how the situation had arisen, why our response is what it was and any other relevant information. A copy of the background sheet which would have accompanied this letter has not been disclosed. My normal course of action would be to read the draft letter and the background sheet, gone back to the Executive Correspondence team with any questions and, when satisfied, signed the letter for sending. I cannot say for definite but it is possible that Legal would also have had input due to the threat of litigation from Shoosmiths / Legal Action.

81. I would have satisfied myself that the content of the letter was accurate based both on the background sheet provided and what I believed to be true about the reliability of Horizon at the time, from the internal messaging within POL. Horizon was very in focus at the time because of the proposed litigation and therefore whilst I may have asked questions around the specific circumstances of the branch, it is unlikely that I would have asked general questions in terms of Horizon's robustness because this had been closely monitored within POL and we had standard messaging as produced by the Communications team.
82. From what I recall, the Executive Correspondence team were responsible for preparing POL's response to any concerns raised by MPs during 2012. I would become involved on an ad hoc basis, to the extent that the issue was relevant to my team and my input was required. Although the Executive Correspondence team would draft these letters, I would always check those that required my involvement and make amendments as I saw fit. As can be seen in **POL00096780**, the email correspondence between Alice Perkins and myself on 8 July 2012, with Paula Vennell's response at **POL00096804**, where Alice had asked for my input regarding the operation of the new 'locals' branch model.
83. From what I recall, I did not attend any meetings with MPs during 2012 or at anytime relating to Horizon, but I was sometimes informed of them, as is seen in the email chain dated 20 April 2012, **POL00105494**. I might be given action

points that arose from such meetings if the action fell within my responsibility.

For example, **POL00105481** is the notes of a meeting attended by Lord Arbuthnot, Alice Perkins and Alwen Lyons on 13 March 2012. Whilst I did not attend this meeting, I can see that I was given two action points to complete ahead of the next meeting on 28 March, including putting together a brief covering the facts about the issues that Lord Arbuthnot raised and finding out what POL could show Lord Arbuthnot about balancing and how SPMs can check their accounts during balancing if he was invited into the model office. Similarly, in **POL00417089**, an email chain from Mike Whitehead to Peter Batten dated 18 June 2012, I have been given two action points concerning NFSP and CWU as I was responsible for these stakeholder relationships (discussed in further detail below).

84. In **POL00142984**, an email chain dated 18 April 2012, Paula Vennells asks me for history on correspondence concerning Yetminster Post Office, which I forward to Sue Huggins and Mike Granville to provide the background. Similarly, in **POL00105490**, an email chain dated 22 May 2012, although I am not copied in, it is referenced that I will look into questions from Sir Paul Beresford. Although I do not recall what these questions were, it was not uncommon for questions to be put to me, not because I was close to the detail but because my position as Network and Sales Director meant that I was well connected to those who would know the detail and I knew who to ask.
85. The Inquiry has asked about my understanding of any steps taken by POL to notify BIS regarding Horizon issues, with reference to **POL00180807**. This is

an email chain dated 22 June 2012 between Paula Vennells and Mike Granville to which I am copied in. Although I held monthly meetings with BIS, this was to update them on the progress of Network and Crown Transformation and I never spoke to them about Justice For SPM's Alliance ("JFSA") or Horizon. I am therefore unable to provide any further details on how they were notified about Horizon issues beyond what is contained in this email.

## **RELATIONSHIP WITH NFSP**

86. Prior to 2004, I would only occasionally engage with NFSP within the various head office roles I held to discuss any changes or developments to the products and services that I was responsible for. However, in 2004, as Head of Franchise Relationships, I became responsible for POL's relationship with NFSP. This responsibility briefly stopped in 2006 – 2007 when I moved to General Manager Multiples but I picked up responsibility for the NFSP again from 2007 – 2009 as Head of Agency Development. In November 2010, I became Network and Sales Director at which point I had oversight of the relationship but my relationship became more strategic, with day to day issues being handled by members of my team and my contact with the NFSP primarily relating to the Network Transformation programme and the future of the branch network. From 2014 – 2016 the responsibility for the NFSP was transferred to Neil Hayward, the new HR Director. It was during this period that the Grant Agreement was negotiated and agreed. From 2017 until I left POL the relationship sat within my business unit.

87. Being responsible for the relationship with NFSP meant coordinating between them and the different teams within POL, keeping NFSP updated on any matters which would affect SPMs and negotiating SPMs annual remuneration increases. NFSP were the recognised representative body for SPMs and they were a good vehicle for two way communications. I would say that I had a good professional working relationship with George Thomson (General Secretary of NFSP), the negotiating committee, executive and the branch officials that I had dealings with. Although I found them to be demanding and challenging, they were supportive of the Network Transformation and I believe that we shared a common goal of wanting success for the branch network and to avoid branch closures as had been seen in the past. It was important that we had a positive relationship with them and had their support with Network Transformation because we were working with them to shape the programme and it was going to be such a big change as I have highlighted at POL11/47 within the Board meeting minutes of 22 September 2011, **POL00030365**.

88. As I was responsible for POL's relationship with NFSP, I would often be forwarded any communication or information that was relevant to them such as POL00294748, the email sent by Mike Granville on 2 February 2011 informing me that NFSP was supportive on Horizon, in response to the BBC programme . George Thomson would keep me updated of any relevant information, as he did on 12 July 2013 where he has forwarded on an email from a dissatisfied SPM, **POL00372043**. George also had good connections within POL and so would often email the relevant person direct but keep me



copied in for information purposes, as he has on 20 December 2012 in respect of a letter received from Alan Bates at **POL00296010** and **POL00296011**. I do not think that I would have responded to either of these emails.

89. In 2014, the responsibility for the NFSP transferred to Neil Hayward (Group People Director). It was during this time, that the Grant Agreement was developed and agreed which created a difficult relationship between POL and NFSP. I would still assist as and when required, as noted in the action that Paula Vennells has given me in her email of 15 August 2014, **POL00348119**. As seen in the email from Nick Beal to me on 17 January 2014, **POL00150720**, as the negotiations over the Grant Agreement occurred, other issues were brought to the table such as the Cliff and Network Extension as negotiation tools. As these were both my areas of responsibility, I was kept updated. Because of this involvement and due to my seniority, I also attended the annual NFSP conference on 11 May 2015,, which discussed the Grant Agreement. **POL00151913** are the NFSP conference papers dated 11 May 2015.
90. From December 2016 until I left POL, responsibility for the relationship with the NFSP was transferred back to me, as seen in the Group Executive Agenda of 14 September 2017, **POL00027276**. In the main, I felt that POL had a positive but challenging relationship with NFSP.

91. In the early days of my involvement with the NFSP, members of my team and I would meet Colin Baker (General Secretary of the NFSP prior to George Thomson) and subsequently George and their negotiating team to discuss or negotiate and agree any changes that were happening within POL. A large part of my role was to negotiate and agree remuneration rates and changes to products and services particularly the annual remuneration negotiation.
92. Occasionally, I would be invited to the national executive council to discuss matters that would have an impact on NFSP members, such as before the roll out of the Network Transformation Programme (**NFSP00000454** – NFSP report of a meeting of the National Executive Council on 10 – 12 October 2011). I can recall Michael Larkin (Head of Agency Sales) and myself attending the National Executive Council meeting in 2010 to explain the new field support structure and what it would mean for SPMs but I don't recall attending many of these meetings.
93. From time to time, I would also attend local branch meetings, either through a planned series of events or ad hoc meetings where I had been invited. If I was asked to present on a chosen topic I would always allow time at the end for questions about wider business issues which was a useful way of getting firsthand feedback.
94. In my role of Network and Sales Director, I would have regular meetings with George Thomson. These would be ad-hoc, as and when matters needed to be discussed. George also had a quarterly one to one meeting with Paula

Vennells that I would attend. As the Network Transformation was happening, we worked very closely with the NFSP to make sure that they were kept fully informed of what was happened and we worked closely with them to shape the programme.

95. Colin Baker and later George Thomson, had good access to all parts of the business and George, in particular, had contacts at the most senior levels of the business, meaning it wasn't just me and my team who were having contact with them. Whilst I would facilitate meetings and access for the NFSP to all parts of POL where required, for any complex or technical issues which were specific to an area of the business, these would be dealt with by the subject matter expert within POL.
96. POL would also support the NFSP annual conference with stands and presentations and there would usually be a government minister and Paula Vennells speaking so that material matters could be discussed and voted on and so that the NFSP had the chance to ask questions direct to the government and POL CEO.
97. When the SS review was published in June 2012, NFSP started to receive a number of complaints from SPMs and ex-SPMs about Horizon which were forwarded on to POL. George Thomson was very annoyed that SS had been commissioned and he emailed Paula Vennells on 22 June saying that 6 or 7 people had contacted NFSP in the last 2 days and asking why his views were not sought prior to POL commissioning a review of Horizon, **POL00295389**.

98. There continued to be multiple complaints to NFSP in the following days which were forwarded to myself either direct or in copy as shown in **POL00295392, POL00295393, POL00295394**, all being emails from George Thompson to me and Paula Vennells dated 26 June 2012. These were forwarded to me because I was responsible for the relationship with NFSP.
99. I cannot remember specifically dealing with any complaints from the NFSP about the integrity of Horizon. As I've explained above, the NFSP had a good network of contacts in POL and any complaints could have been raised directly with the appropriate people or departments for example, Angela Van Den Bogerd, for issues with training and support, IT for issues relating to Horizon, or even with Paula Vennells. I know that POL's Communications team also had good links with the NFSP and so would often deal with them direct in respect of complaints, although my team may have facilitated this communication.
100. Again, I do not recall specifically, but it is clear from **POL00295395** (email chain dated 27 June 2012) that I spoke to George Thomson and wanted to put in place a process to pick up any future complaints as the number had risen following the publication of SS's report. I think that after this point, all complaints were sent direct to Angela Van Den Bogerd, Craig Tuthill and Susan Crichton to deal with centrally. I think that POL's Communication team were also in touch with NFSP to share any briefings that they had on the integrity of Horizon but I cannot say for sure. I can also see from

**POL00105607** (email from me to Dave Hulbert dated 5 July 2012) that George was taken down to Fujitsu to talk through some incidents but I don't know what these incidents are. I do not think that I had any involvement with this meeting although my team may have facilitated it.

101. **POL00152168** is an email from me to Mark Davies dated 14 June 2015 in which I say *"if we could get George making a positive public response it would be v helpful"*. My email is in response to Mark Davies, who has emailed the Field Team who I was responsible for, as well as me, saying that Panorama is planning a piece on Post Office and Horizon. Mark outlines his preferred approach and asks for our input and help in executing this approach. I respond that it would be helpful for George to make a positive public response about Horizon because I thought this would provide reassurance to SPMs if they saw that their representative body was supportive of Horizon, which is what I understood the NFSP's position to be at that time. I was prompted to make the comment about George after Nick Beale (who was responsible for the day to day relationship with the NFSP) was asking Mark to meet, about briefing George.

102. **POL00372043** is an email from SPM Richard Blackshaw to George Thomson, forwarded to myself and others, dated 12 July 2013. I cannot recall my reaction upon reading it and cannot recall if any response was made. Reading it now, it is a highly emotive email and I am sure I would have thought the same at the time.



## SECOND SIGHT

103. I was not personally involved but from memory, I believe that Alice Perkins (Chair) and maybe Paula Vennells (CEO) were responsible for the appointment of SS. However, I think it was Susan Crichton (General Counsel) who suggested SS because she had worked with them before.

104. Again, I had no involvement in the ambit of SS's investigation and I cannot say for sure, but my recollection was that it was agreed between Paula Vennells and Alice Perkins, in discussion with Lord James Arbuthnot and Susan Crichton.

105. I was not involved in and do not know what access SS had to information or relevant documents and therefore do not feel able to comment on this.

106. I have reviewed **POL00021508** (POL Board Meeting Minutes 4 July 2012), **POL00167447** (POL Board Meeting Minutes 24 June 2013) and **POL00358173** (the statement that POL issued following the publication of SS Interim Report, dated 8 July 2013). I do not recall these meetings and was not involved in the drafting of the statement and so do not feel able to add anything beyond what is contained in the documents. I have, however, noted that the Board Meeting Minutes of 24 June 2014 state:

*"The CEO explained that although the SS report had been challenging it had highlighted some positive things as well as improvement opportunities. The*

*business had been praised in Parliament for setting up the independent review; the proportionality of the tiny number of cases had been emphasised; and no systemic issues had been found with the Horizon computer system. However there were cultural issues which had to be addressed to improve the support we gave to SPMS.”*

107. I understand that this was the first time that the Board met to discuss to the SS Interim Report and therefore it is my assumption that Paula Vennells message was a reflection of the Board's view of the Interim Report. However, I cannot comment on how other senior executives within POL viewed SS and the purpose of its investigation as I had little involvement with it. Personally, I believed that Horizon was robust but recognised the benefits of an independent review as there were people saying something was wrong and so I thought the decision to appoint SS was sensible.

108. I was not involved in POL's response to requests for information from SS and / or investigations into the integrity of Horizon and so do not feel able to comment on it.

## **THE INTERIM REPORT AND MEDIATION SCHEME**

109. The below deals with my involvement in POL's preparation for and response to SS's reports, the Branch Support Programme and the Mediation Scheme.

**Involvement in preparation for and response to Second Sight's reports**

110. I was not involved with POL's preparation for, or response to, SS's Reports other than to provide my input as and when requested. For example, an email chain from 16 July 2013, **POL00192104**, states that as part of POL's response to the SS Interim Report, a regular conference call will be set up to enable any identified issues with Horizon to be shared with business units who use and rely on the system. A representative is required from multiple areas of the business, including Network, with the email chain showing that I have nominated Nick Beal as an appropriate representative to Crowns, Agency, Multiples and Partners.

111. As a member of ExCo, I would have been updated with what was happening in response to SS's Interim Report but would not have been involved in formulating this response. For example, **POL00207756** (email from Belinda Crowe to me and others dated 21 August 2014 and attachment **POL00207757** (Second Sight Briefing Report – Part Two) and **POL00101299** (email from Mark Davies to me and others dated 5 September 2014)

112. I have reviewed **POL00190338** which is an email dated 3 July 2013 from Martin Edwards (Paula Vennells' Chief of Staff) to myself and other senior employees attaching a briefing note on the SS Interim Report, **POL00190341**. Martin's email states that the headline point to note is that

*“to date, no systemic issues have been identified in the Horizon system itself through this process. However, we expect SS will draw attention to areas for improvement in our wider support system (e.g. the guidance and training provided to smprs).”*

113. The Inquiry have asked whether I consider the phrase “systemic issues” to be a concept that is distinguished from the description of “system exceptions”. My interpretation is that they are distinguished, in that if something has systemic issues it is fundamentally flawed, whereas if something has system exceptions (or anomalies as referred to in the Briefing Paper), then it might be an issue which requires rectification but does not necessarily mean that it is an issue which undermines the overall integrity of the system. In this context, the fact that we were told that Horizon had no systemic issues but some system anomalies, to me meant there were some bugs which required attention but did not undermine its overall integrity.

114. I was not involved in any decision making relating to the ambit of SS’s investigation or the extent of its access to relevant information and documents.

115. Both Martin’s email **POL00190338**, and the Briefing paper, **POL00190341**, both dated 3 July 2013, reference a meeting that Alice Perkins, Paula Vennells and Alwen Lyons had with Lord James Arbuthnot on 3 July 2013. I do not believe that I had any involvement in preparing for this meeting.

116. I do not believe that I was involved in liaising with any MPs in relation to matters arising from the interim SS report, or in any communications / stakeholder plans to manage the potential scenarios following the publication of the Report. There was a specific team who dealt with this and I was given updates as a member of the ExCo.

117. In an email dated 10 July 2013, **POL00341624**, George Thompson forwards an email from a Dispute Resolution firm which has contacted the NFSP, asking if George wants legal advice, having read “*detail of the computer system fall out*”, to Paula Vennells, Susan Barton, Nick Beal, Mike Whitehead and myself . In forwarding the email, George comments:

*“This is the type of mess we have created with the Horizon debacle. Our tactics were totally misguided.”*

118. I do not know what tactics Mr Thomson is referring to, but it could be a reference to POL’s decision to conduct an independent review into Horizon, which Mr Thomson previously expressed annoyance about, as shown in **POL00295389**, the email chain dated 25 June 2012..

### **Involvement in Initial Complaint and Mediation Scheme**

119. I had no involvement in the Initial Complaint and Mediation Scheme but as part of ExCo, I would have received regular updates on its progress.



120. In addition to the documents referenced within the body of my answers below,  
I have reviewed the following:

- a. **POL00029663** (email chain between Paula Vennells, Lesley Sewell and myself dated 15 July 2013) – the email starts with Paula disclosing a confidential case study, which she has been allowed to share to help POL plan what to do to correct the issues raised in the SS review. The case raises a number of issues for Susan Crichton and myself to look at, covering issues such as *“tone of voice, help not available, escalation impossible, Network and Legal blocking any ability to discuss, contract questions etc.”* These issues all highlight shortcomings which made SPMs lives operationally more difficult. This demonstrates my involvement in individual cases within the Scheme where they concerned operational issues so that I was aware of them and could then enable improvements to be put in place
- b. **POL00298435** (emails between SPM Pervez Nakvi, dated 21 August 2013) – Paula Vennells has blind copied me into an email responding to a SPM who she knows well, asking for Angela Van Den Bogerd or one of her team to be in touch. I am likely copied in for general awareness, in case my involvement was needed at a later date, given that Paula knew the SPM personally. Again, this is an example of where I might be copied into correspondence for the higher profile or more complex cases.
- c. **POL00099702** (email chain dated 4 October 2013) – Paula Vennells has forwarded a spreadsheet of ‘thematic issues’ of cases likely to go into the mediation process. She has shared with this the whole ExCo team, firstly to

make us aware and secondly, to think about how we share the information and take learnings from it.

- d. **POL00294482** (email from Gayle Peacock to me and others dated 30 July 2014) and attachment **POL00294483** (Branch Support Programme – Work Stream meeting papers dated 31 July 2014). This refers to a Workstream meeting which I would not have attended. I did, however, chair the Branch Support Programme Steering group meetings.

121. The Inquiry have asked me to consider **POL00040032**, a document entitled *“Lessons Learned” Review of handling of alleged issues/concerns about Horizon: Terms of Reference* dated 30 August 2013. The document lists myself as one of the people who will be interviewed in relation to an internal POL review of the way in which Horizon complaints were handled in the period before the SS Interim Report.

122. I have no recollection of attending any such interview or being asked to attend any such interview and I do not recall seeing any report which covered the scope as set out in this document.

123. On 27 November 2013, the Board agreed that it would be appropriate to consider the future approach to prosecutions (**POL00021520** – Meeting Minutes: Board meeting minutes for meeting held on 27 November 2013). I cannot remember exactly and the Board papers do not assist me, however, the Prosecutions Policy paper, **POL00100193**, shows that at an ARC meeting on 19 November 2013:

*“the Committee considered whether or not there was merit in formally amending the existing approach to prosecutions and if so what the substance of these amendments should be”.*

124. I am assuming that as a result of this it was discussed at the Board. I was not a member of the ARC or the Board and I cannot remember what approach was approved but from my recollection, the prosecutions remained suspended. I think that the trigger for the policy review was because of the publication of SS's report, but I cannot say for sure.

125. Although I was not involved in the reasoning behind the changes made to the policy, I can see from the email chain of 5 February 2014, **POL00130502**, that Neil Hayward, Chris Day and I were asked to sign off a note on the prosecution policy dated 4 February 2014, **POL00100193**. The email chain shows that I am largely supportive of the policy but have a few observations / questions arising from the 'Commercial Impact / Costs' section of the note.

126. On 11 February 2014, the ARC Sub-Committee held a meeting based off the note of 4 February 2014, **POL00100193**, the purpose of which was to seek the ARC's views on the proposed changes to the prosecution policy and the way in which POL will prosecute criminal cases in the future. I am not listed as an attendee at this meeting and do not feel able to add anything beyond what is contained in the meeting notes, **POL00030900**, dated 7 February 2014.

127. During the entirety of my employment at POL, I never thought that there was a risk that POL had inappropriately prosecuted SPMs and never thought or had reason to believe that anyone else in POL thought this either. I can see from the documents disclosed, that in multiple ExCo meetings, including: 16 September 2014, **POL00306425**; 16 October 2014, **POL00149190**; 13 November 2014, **POL00038819**; and 15 January 2015, **POL00109859** that we received the same update in respect of criminal litigation as follows:

*“There are a number of cases which could have been prosecuted...but prosecutions were not commenced to avoid adverse judicial comment. Several cases have also been terminated while POL obtains an independent expert report on the Horizon branch accounting system...There are currently 14 cases being kept under review as to whether a prosecution (supported by an expert report) can be commenced.”*

128. My recollection is vague and I cannot recall the chronological order of events but from memory, prosecutions stopped from late 2013 and my belief was that this was because of SS's report. However, I cannot remember any specific details around this and I was never directly involved.

129. I was not directly involved in the Mediation Scheme but I understood that any complaints that were made about Horizon were being investigated and process improvements were developed where there were shortcomings. For training and support issues, improvements were developed and implemented by the Branch Support Programme.

130. When the Scheme was first set up, a process was put in place to centralise all complaints as referenced in **POL00145553** (emails between Matt Baker of CWU, Angela Van Den Bogerd and myself dated 18 July 2013). This email chain concerns a SPM who is experiencing problems with losses which he believed was because the new security alarm system which had been installed was sharing the same communication line as Horizon. I have forwarded it on to Susan Crichton and Nick Beal, copying in Angela Van Den Bogerd, asking whether there is now a process for handling these. Angela confirms that there is now a process for logging and acknowledging the case although the second part of the process, how to work with the SPM to get to the bottom of the issue, needs to be reviewed.

131. From reviewing the papers disclosed, the process for suspension and termination changed around July 2013 as noted in **POL00145530** (email chain dated 17 July 2013) and **POL00327004** (email chain dated 17 July 2013). At the same time, the SPM Appeal Panel Process was reviewed as shown in **POL00125022** (email from John Breedon copied to me dated 12 July 2013), **POL00125023** (SPM Appeal Panel Review Document) and **POL00341652** (SPM Appeal Panel Process Document)).

132. From memory, there was a case concerning a Scottish SPM, David Woodrow, who was suspended because he retained £2,000 in lieu of a rates issue which was exclusive to Scotland. This is noted in **POL00099179** (Email chain between SPM David Woodrow, Paula Vennells, myself and others, dated 12



July 2013) and **POL00116059** (associated SPM case summary) and **POL00145419** (associated email chain of the same date). Paula Vennells forwarded the case to myself and Susan Crichton, asking us to take this seriously and investigate as his suspension appeared to be overbearing and disproportionate. I am asked to meet with Susan and Paula to discuss what we can do about this and what we might need to think about to be able to respond responsibly going forward. I cannot say for definite, but it could be that as a consequence of this meeting, we reviewed the processes for suspension and termination and appeal panel process.

133. From looking at the documents, we increased the threshold for suspensions with no suspensions to take place if the amount of money in dispute was below £2,000. We also created greater oversight, with any future suspension requiring authorisation by either Lin Norbury or John Breedan. For all other cases, they would be referred to one of the national contract managers who would then speak to either Nick Beal, Michael Larkin, Angela Van Den Bogerd or myself, so that we could start to get a better picture of what was taking place to help us formulate new criteria.

### **Branch Support Programme**

134. The SS Interim Report identified a number of weaknesses in the training and support that was provided to SPMs and gave a number of associated recommendations. The Branch Support Programme (later known as the Branch Improvement Programme) was established to look into these

weaknesses and implement the recommendations. As noted in the Terms of Reference, **POL00089711**, dated 19 July 2013:

*“The purpose of this Programme is to understand the current business processes, operational procedures and ways of working which are in place to support branches, identify the gaps and produce recommendations to rectify the issues.”*

135. The programme was underpinned by three guiding principles: 1. Treat with dignity and respect at all times; 2. stand in SPMs shoes and 3. Right first time.

136. Paula Vennells asked Angela Van Den Bogerd to lead the programme and I was asked to sponsor it as all programmes required an Executive sponsor. As a sponsor, I was not involved in the day to day running of the programme but it was my role to make sure that the programme was on course to fulfil its purpose, had adequate resources and was delivered to time, cost and quality objectives.

137. I would be kept updated on the progress of the programme, as shown in a **POL00203724** (Network and Sales Lead Team Meeting on 2 May 2014) and would have approved any business cases related to the programme as shown in **POL00369484** (Business Case for Branch Support Programme dated 9 May 2014 and **POL00304377** (email from Angela Van Den Bogerd to me dated 9 May 2014). As my role was to ensure that the Programme was fulfilling its objective, I would occasionally send actions to Angela Van Den

Bogerd to assess our progress. For example, at **POL00312231** (email chain dated 18 February 2015) I ask Angela to *“consider how we should test the contract managers engagement with sub postmasters to see if new approach is working”*.

138. The Branch Support Programme was later developed into the Branch Improvement Programme, which had a wider scope, as detailed in the Terms of Reference dated 4 February 2014, at **POL00148920**. I continued to be the sponsor and Angela continued to be the Programme Director. As sponsor, I would continue to receive updates on the programme as shown in the following documents:

- a. **POL00374418** – Branch Support Programme Presentation dated 6 June 2014
- b. **POL00039217** – Branch Support Programme DRAID Log dated 6 June 2014
- c. **POL00374558** – Branch Support Programme Training Board dated 7 November 2013
- d. **POL00091483** – Branch Support Programme Meeting Slides dated 13 June 2014
- e. **POL00407938** – Email chain dated 25 June 2014 and attachment **POL00407939** (Branch Support Programme paper dated 25 June 2014)

- f. **POL00374655** – Email from Gail Peacock to me dated 10 July 2014 and attachment **POL00374656** (Branch Support Presentation dated 11 July 2014)
- g. **POL00349923** – Email from Angela Van Den Bogerd to me and others dated 19 November 2011 and attachment **POL00349924** (Branch Support Programme paper for ExCo dated 20 November 2014)
- h. **POL00220938** – Email from Craig Tuthill to me and others dated 3 February 2015 and attachment **POL00220939** (Branch Support Programme Steering Group Meeting)
- i. **POL00446790** – Branch Support Programme Improvements Updated dated 12 February 2015

139. I may sometimes give an introduction at the start of Steering Group meeting to set out the objectives of the meeting and also give views, guidance and direction where necessary on individual agenda items. In general, these briefings would provide an update on the programme. I would also review slide decks that were used at the Branch Support Programme and Transformation Board ahead of presentations and ask questions to refine the slides as necessary as shown in the following documents:

- a. **POL00374441** - Email from Gail Peacock to me dated 11 June 2014 and attachments **POL00374442** (Branch Support Transformation Programme dated 11 June 2014 and **POL00374443** (Branch Support Programme Performance Narrative dated 11 June 2014)
- b. **POL00374556** – Branch Training and Support Programme Presentation (undated)

- c. **POL00374750** – Email from Gayle Peacock to me dated 7 August 2014
- d. **POL00374850** – Email from Gayle Peacock to me dated 21 August 2014 and attachments **POL00374851** (Branch Support Transformation Programme dated 4 August 2014), **POL00374852** (Transformation Committee August 2013 narrative dated 22 August 2014 and **POL00374853** (Branch Support Dashboard 2014 dated 22 August 2014)
- e. **POL00210245**- Transformation Committee Slides dated 9 October 2014

140. I was not involved in the Working Group which was established to monitor the Mediation Scheme. My recollection is that this was given direction and oversight by the Project Sparrow Sub-Committee. However, I would have been aware of it and received updates on its operation as a member of ExCo.

141. I cannot recall any specific discussions that I had with individuals in the ExCo on the Mediation Scheme and SS Report, other than those shown in the ExCo meeting papers:

- a. **POL00414076** – Board meeting papers dated 30 April 2014
- b. **POL00300065** – ExCo meeting papers dated 8 May 2014
- c. **POL00027399** – ExCo meeting papers dated 4 June 2014
- d. **POL00027377** – ExCo meeting papers dated 3 July 2014
- e. **POL00207432** – ExCo meeting papers dated 19 August 2014



- f. **POL00027358** – ExCo meeting papers dated 11 September 2014
- g. **POL00306425** – ExCo meeting papers dated 16 September 2014
- h. **POL00149190** – ExCo meeting papers dated 16 October 2014
- i. **POL00038819** – ExCo meeting papers dated 13 November 2014
- j. **POL00149531** – ExCo meeting papers dated 20 November 2014
- k. **POL00214660** – ExCo meeting papers dated 16 December 2014
- l. **POL00351813** – ExCo meeting papers dated 12 February 2015
- m. **POL00151514** – Group Executive meeting papers dated 12 March 2015
- n. **POL00130901** – ExCo meeting papers dated 16 April 2015

142. Although I would not have been party to discussions, I was updated on Project Sparrow. For example, I would have had sight of the Sparrow Lessons Learned Paper dated 25 April 2014, **POL00104259**, and would have been briefed on the Initial Complaints Review and Mediation Scheme: The Way Forward, dated 3 June 2014, **POL00205259**. This paper noted the scheme was taking far longer than expected and proposed three options for consideration by Sparrow Sub-Committee as shown in **POL00205260** (Sparrow Sub-Committee Scheme briefing dated 9 June 2014).

143. As I was on the ExCo, I received updates on Project Sparrow. For example, on 11 December 2014, Alwyn Lyons alerting the ExCo that there would be a parliamentary debate on the Mediation Scheme **POL00027747** and on 14 January 2015, Mark Davies providing a general update on the Mediation Scheme as shown in **POL00150615** and attachment **POL00150616**

(Mediation Scheme Summary dated 14 January 2015). Similarly, the documents disclosed show that Mark emailed myself and other senior colleagues on 22 January 2015 **POL00027739** and 30 January 2015 **POL00117078** to provide us with an update on Project Sparrow ahead of the BIS Select Committee hearing. As Mark notes, these messages were to keep me and others in the loop and I cannot recall any subsequent discussions from them.

144. I was not responsible for responding to, or assisting with the response to, Freedom of Information requests in connection with Horizon or SS matters but as a member of ExCo, I was updated when we received them, as can be seen from me being notified of them on 2 October 2014 at **POL00210081**, 17 November 2014 at **POL00349860**, 27 March 2015 at **POL00225651** and 27 April 2015 at **POL00353617**. I believe, these email notifications would have been for information only and my assumption is that there was an internal policy on how to respond to them.

145. I had no involvement in POL's strategy in preparing responses to applications made to the Mediation Scheme or in POL's response to SS's investigations, including disclosure of documents to SS.

146. I never had any concerns that I was not receiving accurate and / or complete information regarding BEDs, remote access or the integrity of Horizon and I never had any reason to think that others in POL were not, particularly those responding to applications to the Mediation Scheme. I was reassured that the

Scheme had the oversight of legal and IT specialists and I truly believed at the time that the information POL had obtained was complete and accurate.

147. On 9 March 2015, Jane MacLeod (General Counsel) sent a message via Alwyn Lyons that POL would be bringing the Working Group to a close and giving notice of termination to SS, **POL00352489**.

148. Mark Davies sent an email, **UKGI00003629**, the following day, 10 March 2015, to the Board, copying in ExCo, with an executive summary of the reasons for closing the Working Group. He states that POL has now completed the investigations of all of the 136 cases admitted to the Mediation Scheme and nothing has been found in any of the cases to suggest that Horizon has not worked as it should. Having completed its investigation, POL has decided to put forward for mediation, all cases remaining in the Scheme except for those that have been subject to a previous Court ruling. Later that day, an update from Jane Hill and Mark Davies is circulated confirming that POL has made the public announcement that the Working Group is to close with immediate effect and that JFSA, SS and MPs with a case in the Scheme (or a particular interest in Post Office) have been separately informed alongside the announcement **UKGI00003691**. Two days later, as shown in **POL00224273**, Mark emailed me direct, providing another update on media coverage and Sparrow, following the issue being raised by James Arbuthnot MP in Prime Minister's Questions.

149. From my recollection and on review of the documents disclosed, the Mediation Scheme was taking a lot longer than anticipated with JFSA and SPMs unhappy that their expectations were not being met and POL not being happy with some aspects of the quality of SS's work. As POL had completed its investigation into all cases, it therefore decided to mediate all cases apart from those that had gone through the Courts.

150. In the same month, the Branch Support Programme was brought to an end with resources removed. It was felt that following the wrapping up of the scheme, all the necessary improvements were delivered or in place to be delivered and transferred to the business as usual teams. A presentation on the programme as provided for a Steering Group meeting in this month is at **POL00223299**.

151. On 30 July 2014 I, along with other senior members, was sent minutes and actions from the Risk and Committee meeting on 21 July 2014 - **POL00206989** with attachment **POL00206990**. P.5 of these minutes references a Project Zebra, a report by Deloitte on the internal controls over Horizon. Prior to reading these documents I could not recall Project Zebra and I was not an attendee at this meeting. I do not recall having any involvement and my awareness would have only been very peripheral.

## THE DEATH OF MARTIN GRIFFITHS

152. I was deeply shocked and saddened at the death of Martin Griffiths and owing to the tragic nature of the incident, a lot of senior managers were notified and involved. From memory, following the incident, Angela Van Den Bogerd took the lead in keeping myself and others updated on Martin's condition and putting in place practical arrangements for the family, such as a temporary SPM to keep the branch open and providing ongoing payment of remuneration to Martin's family. There were a lot of unknowns at the beginning and so Angela also assisted in answering any questions that Paula had around the circumstances of Martin's case as shown in **POL00196100** (emails from Paula Vennells to Angela Van Den Bogerd and myself dated 12 October 2013).

153. Mark Davies took the lead on the media communications as can be seen in the email chain of 24 September 2013, **POL00116133**. I maintained general oversight as to what measures POL was putting in place to support the family and kept Paula Vennells updated. As noted in my email of 30 September 2013, **POL00300096**, *"our priority is to support the family in this difficult time"*.

154. After Martin passed away, I telephoned Gina Griffiths (Martin's wife) to offer my sincere condolences on behalf of POL. **POL00393539** is an email chain between Paula Vennells, myself and others from 11 – 22 October 2013. Within this email chain, Angela wrote explaining that Gina Griffiths had contacted Glen Chester to enquire as to whether there was any death in



services benefit or pension and he had confirmed that neither was available *“given the Spmr status and contract for services etc.”* Following this, Fay Healey (Chief HR Officer) is asked by Paula Vennells to look into a couple of options for payment. Fay subsequently emails me on 22 October 2013, copying in other senior members of the team, outlining a number of different payment sources. She states *“Having discussed all of this with Mark, Belinda, Angela and Alwen our collective view is that we should not consider a payment at this stage, happy to discuss the rationale in person”*.

155. The Inquiry have asked to what extent I was satisfied with the response/plan arising from this correspondence. I have not been sent any further disclosure following Fay’s email but from what I recall, payment was made to Martin’s family through the Network Transformation funds. No amount of money can be satisfactory payment for a life, but I think that I was at least satisfied that Angela had found a way for some payment to be made. From what I remember, everyone at POL was truly devastated, as noted in Angela’s email of 16 October 2013, **POL00381972**.

156. The Inquiry have asked me to consider **POL00196407** and **POL00196410** (email from Mark Davies to myself and other dated 16 October and attachment). Mark’s email informs me and other that Alan Bates has proactively contacted the local MP (Jo Swinson) with regard to Martin Griffiths, with the attachment showing a copy of this correspondence. As a result of this, Mark says that he would like to contact the MP and offer a meeting about the case which he thinks would need to involve Angela, myself

and possibly Paula. I don't believe that I met with Jo Swinson MP in relation to this matter and there are no further documents in my bundle to suggest what happened following this email.

## **2014 AND 2015 MEDIA COVERAGE**

157. During my time on ExCo, I regularly received internal updates from Mark Davies on the media's response to Horizon and related issues, such as Project Sparrow and SS' Report, as shown in the documents listed below:

- a. **POL00101340** – Email from me to Mark Davies dated 9 September 2014
- b. **POL00101353** – Email from Mark Davies copied to me dated 10 September 2014
- c. **POL00101632** – Email chain dated 5 December 2014
- d. **POL00101761** – Email from Mark Davies to me dated 9 December 2014
- e. **POL00385837** – Email from Mark Davies to me dated 12 December 2014
- f. **POL00308946** – Email from Mark Davies to me dated 17 December 2014
- g. **POL00101983** – Email from Mark Davies to me dated 14 January 2015
- h. **POL00102395** – Email from Mark Davies to me dated 12 April 2015

158. Occasionally, I would also receive emails from Paula Vennells providing an update on important media matters, such as the parliamentary debate as

shown in **POL00116922** (email chain from Paula Vennells to me and others dated 17 December 2014). These updates were to keep me and other senior leaders informed on what was happening within the media but I did not have any direct involvement with formulating POL's response to media coverage. The limits of my knowledge with what was happening within the media is noted in **POL00333392** (email from Paula Vennells to me and others dated 14 January 2015) where Paula Vennells notes "*I expect the Exec and SLT colleagues are not so well briefed.*" Although I received regular updates, I was not close to the detail of what was happening.

159. On occasion, I would be specifically approached to provide my input. For example, in an email dated 24 April 2015, **POL00151835**, Mark Davies drafts a message to be sent out to the network from the leadership team which he says is probably best pitched from me, given my position. Similarly, an email from me dated 14 June 2015, **POL00162429**, shows Mark Davies running a proposed approach in respect of Panorama past the senior leadership team for our input. Although my input might be sought on tone and audience, I was never involved in drafting the actual content.

160. Separately, I was involved in a BBC Programme called "signed, sealed, delivered" which aired in July 2015 and is referenced in the email from Paula Vennells on 30 July 2015, **UKGI00005157**. This was not to do with Horizon, but was a fly on the wall documentary, about every day life in the Post Office and was seeking to underline the imperative for change that was happening within the business.

161. I was not involved in developing the strategy or content of internal communications relating to the Horizon IT system content. However, I would be asked from time to time to send out communications to my teams on the subject. Draft communications would be sent to me asking for my approval and where necessary sent out on my behalf.

162. In terms of internal communications regarding challenges to Horizon, every day there would be the Daily Digest which summarised internal news. This would be on all internal communications, not just Horizon. For example, the Daily Digest from 10 September 2014, **POL00158683**, provides internal communications on the leaking of the SS Report, as well as an industry news summary.

163. I did not have sight of any policies in respect of internal communications on Horizon, but I can see that Mark Davies has said in his email of 14 June 2015 that his aim is to *"make sure we reach the front line with reassurance and information"*. This approach is in line with my understanding that POL's intention was to inform and reassure people about Horizon, based on what they believed at the time to be true.

164. I was not on the Board and so am unable to comment on their views as to the media reporting, beyond what is contained in the email correspondence.

165. I have considered **POL00387685** (email from Paula Vennells to me dated 23 May 2015). Within this email chain I write:

*"I'm sure the noise will increase as we implement the cliff and announce the first few crown closures/mergers next month".*

166. My comment was in response to Mark Davies, who flagged a newspaper article that contained negative and inaccurate comments about the Network Transformation. My response was because I thought we might face similar media articles in the future as we would be shortly announcing more Crown office franchising mergers and what was known as the 'Cliff', where any branches which had not yet converted under the Network Transformation programme, would be given notice to either convert to one of the new models, close with 26 months remuneration or be moved onto variable pay. The concept of Cliff was driven by the fact funding for Network Transformation could not be guaranteed after a certain date and there was a desire to complete the modernisation process to help POL become more competitive and have a more sustainable network. I can recall that despite my thoughts that Cliff may attract a lot of media attention and hence my comment to Mark, in actual fact it did not attract as much attention as I had anticipated.

## **POL's RESPONSE TO COMPLAINTS FROM 2014 ONWARDS**

167. From 2014 onwards I was Network and Sales Director, and then CEO Retail (2017).



168. As referenced above, SPMs might raise concerns about Horizon by writing direct to POL and when the litigation started, there was a process in place to deal with all of the complaints.

169. As referenced above, on a regular basis I would visit branches to meet staff and SPMs to get their feedback and answer any questions or issues they may have and gain first hand experience of day to day life in post offices and SPMs experience. This meant that occasionally a SPM might be in personal touch with me as shown in the email chain dated 21 November 2014, **POL00308162**, and attachment **POL00308163** (Spreadsheet of Copy of 311 of Concurrence Report dated 20 November 2014). Similarly, because of my seniority, a SPM might send correspondence direct to me so that I was aware of a complaint, as SPM Ian Straughan did in his email Of 21 July 2015, **POL00152655**, and later 21 September 2015, **POL00233039**. As referenced above, I would also occasionally attend NFSP local branch meetings where SPMs would have the opportunity to feedback any concerns

170. If I received any complaint direct from a SPM, I would forward it to the appropriate team within POL to investigate. For example, **POL00344065** is an email chain regarding Histon Post Office, dated 17 – 22 January 2014. The email chain starts with an email from me to Dave Hulbert (Head of IT Services) and Nick Beal (Head of Network Development) forwarding a text message from a SPM asking if he can claim any money for his branch being down for longer than 48 hours. I would often provide my phone number to

SPMs so that they could contact me if needed and this is an example of such contact happening, with me taking action to forward his issue to the people best placed within POL to help. Dave Hulbert subsequently responds saying that he will look into the issue with Fujitsu. I can recall this complaint as it was particularly frustrating because it led to an argument between BT and Fujitsu as to where the problem lay, with neither fixing the issue but with the SPM being caught in the middle, extremely upset because they were unable to trade. I ask for this to be urgently looked into, with the email showing that I have spoken direct to the SPM and I want her to be fully compensated. I am subsequently taken out of the email chain with the problem being taken forward by Nick Beal and Dave Hulbert.

171. Due to my role as Network and Sales Director, I was often copied into complaints to keep me in the loop, although my direct involvement was not needed, as with the email chain dated 19 January 2015, **POL00102042**.

172. From 2013 - 2015 the Branch Support Programme was also in operation, for which I was the Executive Sponsor. This is discussed in further detail above but one of my roles as a sponsor was to oversee the costs. An email from me to Angela Van Den Bogerd dated 27 November 2014, **POL00350031**, shows Angela asking me to approve a business case asking for funding which would automate a manual transaction around cheques, helping to prevent human error. This is a good example of the programme putting in place practical measures to assist SPMs when complaints were raised over the practical operation of Horizon. Because Angela was in charge of the day to day running

of the Business Support Programme, I would also usually direct SPM complaints on Horizon to her to deal with as shown in **POL00308241** (email from Angela Van Den Bogerd dated 28 November 2014), **POL00150177** (email from Paula Vennells copied to me dated 14 December 2014) and **POL00314060** (email from Angela Van Den Bogerd dated 1 April 2015) and if I received feedback on an issue then I would feed this back to her to look into. For example, in April 2015 I emailed Angela, **POL00353200**, to let her know that an issue that a SPM had thought was Horizon related, was actually an error with the SPM crediting a customer's account, instead of making a withdrawal . In this same email chain, I feed back to Angela that reduced classroom training meant the SPM was having to dedicate more time to a new person and ask her to look into it.

173. If a complaint was particularly high profile or complex, then I might be asked to oversee it. For example, in December 2014 Paula Vennells asked me to sponsor a review of a complaint by SPM Haydi O'Brien, **POL00150182**. I agree to sponsor it and to look at it objectively to see whether it raises any wider issues. Similarly, in March 2015 Paula asks to me look into a complaint from SPM David Atkins, **POL00151726** and I can see from the disclosure that I was copied into a letter from Nisha Kaur SPM to Paula Vennells on 22 June 2017 about a phone alarm issue, **POL00174666**. The documents disclosed do not assist me and I cannot recall what the outcome of these complaints were. However, the course of action I would have normally taken would be to contact the relevant senior manager responsible and ask them to investigate and let me know their recommendations before

finalising. This would then allow me to review, challenge or support the outcome.

174. In the main, I was copied into correspondence on complaints so that I had a general awareness and oversight of them and could input when needed, particularly as a lot of the complaints related to operational issues. For example, on 4 September 2014, there is an email chain, **POL00355475**, where Michael Larkin (Head of Agency Network and my direct report) makes me aware of an issue at a branch in Crichton Avenue. Michael asks Angela Van Den Bogerd to advise and she says that the problems that the SPM is experiencing are unacceptable and advises on how to stabilise the Horizon connectivity and suggests a remuneration figure to cover the SPMs losses. I follow on from this, asking to make sure that legal are comfortable with the proposed wording for any payment to cover losses.

175. Following this complaint, I had correspondence with Rachael Maskell MP who wrote to me about the issue as shown in **POL00119501** (letter from Rachel to me dated 4 November 2015) and **POL00154419** (letter from me to Rachel dated 11 December 2015). Similarly, **POL00251201** is a letter from me to a Jennifer Joannon JP dated 27 January 2017. This refers to two previous letters of 7 and 16 January which have not been disclosed but from the contents of the letter, Jennifer was writing to obtain information on a branch which was closed due to an audit shortage. I would not have drafted the wording of any external correspondence, but this would have been done by

the Executive Communications Team, who would then pass the letter for me to sign off.

176. Another example of how POL would respond to complaints can be seen from a letter that was sent to Paula Vennells from a SPM, Mr Summers dated 19 March 2017 as shown in **POL00423866** and attachment **POL00423867**. The response is coordinated by the Executive Correspondence Team and because the letter is extremely comprehensive covering a wide range of issues, it has been sent to all the relevant senior managers to investigate and copied to me as CEO Retail. **POL00344413** is an email between myself, Rebecca Barker (IT Service Manager) and others dated 10 February 2014 where Rebecca has provided an update on a joint visit with Fujitsu and POL to look into Outreach site Horizon equipment which was experiencing issues. On 15 February 2014, Paula Vennells emailed Chris Day and myself, copying in Martin Edwards and Neil Hayward about a SPM Pervez Nakvi, who was having problems within his branch, **POL00373817**. The email chain shows that I picked up the complaint and took action 'on the ground', with Pam Heap (Regional Area Manager) visiting the SPM on a Saturday to assist them. Although I would not deal with every complaint personally, if it was particularly important or I was asked to step in, I would take action as I did here. As demonstrated above, my involvement was specific to individual cases, I was not involved in formulating POL's overall strategy in responding to complaints.

177. I have been asked to consider **POL00249601** (email from me to Paula Vennells dated 4 July 2017) and to explain my comment:



*“we can offer HNGa but this could throw doubt on the integrity of HNGx. We took the prospective pmr to meet and speak to other pms who were positive about the local model and the integrity of Horizon. However, 2 of the 3 brothers who are owners of the store believed that running a PO still presented too big a risk.”*

178. From what I recall, we were trying to open a new Post Office in Quarry Bank and one of the prospective operators (being three brothers) pulled out because they had concerns about Horizon in light of the media reports. Paula Vennells asked me how we might provide reassurance and suggested that I offer for them to use the next version of Horizon. I did not think that that was a good idea because at the time, I believed that the current version of Horizon was working as it should be and I thought that by offering to send a more updated version, it might be perceived as POL not having confidence in the existing version.

## **ENGAGEMENT WITH BARONESS NEVILLE-ROLFE FOLLOWING THE MEDIATION SCHEME**

179. As noted in the email sent by Jane Hill on 5 June 2015, **POL00316792**, Jane and I met with Baroness Neville-Rolfe at the Post Office Penzance Road branch in Ipswich on 5 June 2015. This was an informal, non-official visit as Baroness Neville-Rolfe was in the area. The email notes that the SPM and myself led the discussions, with the Baroness asking questions of a

commercial nature, such as around branch and retail turnover, as well as questions about Horizon and SPM training. Overall, Jane's comments on the meeting were positive. I would have attended this meeting because I was the Network and Sales Director to answer questions about the operation of branches and also to brief her on the Network Transformation and Crown Transformation programmes as these were both very important matters at the time and I would be best placed to answer any questions on them.

180. Paula Vennells responds to this email on 6 June 2015, **POL00376515**, and asks me to put my 'black hat' on and drop a note of *"where there could have been negatives/challenges lurking behind the questions asked"*. I take this to mean that she wanted me to see whether anything negative could be taken from the questions asked by Baroness Neville-Rolfe and our subsequent answers.

181. I respond on 7 June, **POL00152132**, reframing the questions that Baroness Neville-Rolfe raised from a negative point of view and providing my answers. I think that Paula had asked me to do this as she wanted to know what sorts of questions Baroness Neville-Rolfe might ask POL about so that she would feel prepared when she met her.

182. **POL00162422** is an email from Mark Davies to me and others dated 11 June 2015. This references a meeting that he attended with Baroness Neville-Rolfe, along with Al and Paula which he says was *"very positive"*. I cannot remember the meeting and my comment *"Great news. Well done mark"*

suggests that I was not there. However, I can see the briefing note, **UKGI00001074**, sent to Baroness Neville-Rolfe ahead of a meeting on 11 June, lists me as one of the attendees. I cannot recall if this was a separate meeting on the same day or if I was originally meant to attend but did not. However, I think that I would have contributed to the briefing note for the meeting.

183. On 8 July 2015 Paula Vennells emails myself and others, **UKGI00004900**, forwarding a positive note from Baroness Neville-Rolfe, following a Board Awayday and two executive meetings, one which included me. A copy of the note has not been disclosed. I cannot remember this meeting or what the content of it would have been about.

184. I cannot recall having an ongoing working relationship with Baroness Neville-Rolfe beyond the meetings referenced above but from memory and from the tone of the emails discussing the meetings, all of my interactions with her were positive.

## **GROUP LITIGATION**

185. As I was on ExCo, I was kept up to date with the progress of the Group Litigation Order ("GLO"). For example, on 25 January 2017, Jane MacLeod emailed me, the Board and other senior members to let us know that the preliminary hearing in relation to the litigation was to take place the next day, **POL00103302**. Similarly, on 30 January 2017, Mark Davies provided an

update to me and other senior managers of the outcome of hearing as part of his weekly communications, **POL00391120**. That same day, I attended an ARC meeting where I provided an update on branch compliance for financial services. Minutes of this meeting are at **POL00247182**. I can see from the minutes that there was also an update on the litigation but I would have only attended the meeting to provide my update and would not have been present for the litigation update. On 13 November 2017 I attended a Group Executive meeting where I can see from the minutes, **POL00251520**, that there was a verbal update on Group Litigation. However, I cannot recall the content of this update. My involvement in the GLO was very minimal although, as can be seen above, I was kept up to date with its progress due to my position as an ExCo. I left POL before the case was heard.

186. I was not responsible for developing POL's general litigation strategy in relation to the GLO, as this was led by the Legal team. However, I was briefed on the proposed strategy, and asked for my input from a business perspective as there were issues which fell under my responsibility (as shown in **POL00024700** (email from Jane MacLeod copied to me and others dated 20 September 2017) and **POL00250687** (email from Jane MacLeod to me and others dated 21 September 2017)), as well as potential implications to how the branch network would be affected if the contractual issues in the litigation went against POL. A paper, **POL00250688**, was then sent to the Board on 26 September 2017, setting out the different options..

187. I did not have any involvement in POL's decision-making to disclosure of documents, preparation of lay and expert evidence or its decision to seek Fraser J recuse himself as I no longer worked at POL at that time.

188. **POL00391185** is an email dated 22 February 2017 from Jane McLeod, forwarding a letter from Freeths (not disclosed). From reading the email, I think that Freeths were contacting SPMs to gain support ahead of the GLO. As I was responsible for the relationship with the NFSP, Jane was raising this with Paula and me for briefing George Thomson and the NFSP more generally to expect these kind of letters, which should be sent to Rod Ismay to deal with. **POL00248687** (email chain dated 19 April 2017) is a copy of this email forwarded on to other senior colleagues without me copied in. I do not remember speaking to the NFSP about the Group Litigation but I am sure that they would have been kept updated about its progress. As noted above, I left the business before the cases were heard.

## LEAVING POL

189. In around November / December 2016, POL reorganised into two business centres (retail and financial services), with Paula Vennells putting me in charge of the retail business, as CEO Retail. However, this was on the understanding that POL would begin actively recruiting externally for someone with retail experience who would replace me. Once a replacement was found, I was put on 6 months gardening leave, starting in January 2018. Although it was a business decision for me to leave, I left on good terms.



190. The Inquiry have disclosed **POL00250878**, a document dated 8 October 2017 which I have never seen before and for which I do not know who the author or recipient is. The documents asks two questions about me, which appear to have been answered by Mark Davies. The first question asks whether I have been sacked to which the answer was *"Absolutely not!..."*. The second question ask why two versions of the announcement of my leaving went out, to which the answer was *"Quite simply, we made a mistake and sent out an earlier draft – we're sorry for the confusion this caused"*.

191. From my recollection, POL made two announcements that I was leaving. The first of these was quite blunt, simply stating that I was leaving but this was followed by a more substantial and personal announcement. As noted in the document, I understand that the first announcement was an initial draft sent in error.

## **GENERAL**

192. During my time at POL, as Network and Sales Director, I was completely focused on delivering the Network and Crown Transformation programmes for which there was tremendous pressure to deliver. This was also a priority and focus for our Shareholder, Board and Executive as it formed a major part of POLs overall transformation and route to profitability. On reflection, I think that we were trying to do too much too quickly and because there were designated teams set up to look into Horizon, I personally did not get as involved in it as I

might otherwise had if Network and Crown Transformation was not happening.

193. I do not think that I could have done anything differently in respect of IT or Legal issues but I can see now, how imbalanced the relationship was between SPMs and POL. I would like to think that if I had been aware of this at the time I would have sought independent advice on how to fix this. I genuinely thought that I and those around me were trying to improve the sustainability of the network and helping SPMs. To me, the SS review highlighted that the problems weren't down to the Horizon system but that there were shortcomings in our training and support. I can see now that we were acting in error in focusing on operational issues.

194. I truly and sincerely believed the messages I was receiving from POL on Horizon. I believed that the Board, Executive and others that I worked with genuinely wanted to get to the truth. We should have commissioned a thorough independent review of the system. From what I have heard from the Court hearings and Inquiry, I feel very frustrated that the extent of BEDs in the system and the uncontrolled remote access was not disclosed.

195. There are no other matters that I wish to draw to the attention of the Chair.

**Statement of Truth**

I believe the contents of this statement to be true.

**Signed:**

**GRO**

**Dated:** 15 November 2024

**Index to First Witness Statement of Kevin Gilliland**

No	URN	Document Description	Control Number
1.	POL00099063	Signed Interim Report into alleged problems with the Horizon system	POL-0098646
2.	POL00145179	Email from Dave Hulbert to Lesley Sewell re: 061904 Baughurst Post Office and Outreach Operations.	POL-BSFF-0004306
3.	POL00105625	Email from Lesley Sewell to Dave Hulbert, cc Antonio Jamasb, Steve Beddoe re: ACTION RE: The Broadway 126001 - Update 1	POL-0104592
4.	POL00294728	Email from Tracy Marshall to Kevin Gilliland, Angela Van-Den-Bogerd cc'd Helen Rose re: Horizon system issues	POL-BSFF-0132778
5.	POL00142625	Ferndown PO Branch - Outline of meeting with Mrs Athwal	POL-BSFF-0001790
6.	POL00041564	Bankruptcy, prosecution and disrupted livelihoods - Postmasters tell their story; reported by Rebecca Thomson - Article	POL-0038046
7.	POL00026572	Horizon – Response to Challenges Regarding Systems Integrity	POL-0023213
8.	POL00444612	Email from Carol King to Victoria Noble and Jenifer Robson re A subpostmistress' trial for discrepancies in her branch	POL-BSFF-096-0006539
9.	POL00363086	Email from Victoria Noble to Lynn Hobbs and Kevin Gilliland re: URGENT Impact Transaction Correction and Branch Trading Issue	POL-0185327
10.	POL00326693	Email from Lesley Cartwright to Jennifer Robson RE: TC and BT and the 42 week issue	POL-0173913
11.	POL00015020	Email from Maureen Moors to Adrian Wales, Andrew Daley, Andy Hayward, Paula Vennells	POL-0008212

		and others Re Major incident stakeolder REPORTING: Tile Farm - audit shortage at branch	
<b>12.</b>	POL00403835	Post Office Ltd Internal Review of Agents Processes in Managing Suspected Financial Irregularities.	POL-0188578
<b>13.</b>	POL00434015	Email from Christina Wood to various re Major Incident Stakeholder Reporting: Shortage over £46k Glenholt SPSO	POL-BSFF-FLP006-0000001
<b>14.</b>	POL00405605	Email chain from Kendra Dickinson to Anne Allaker RE: Penzance PO - Mrs Tenbeth - update and action proposals	POL-BSFF-0229917
<b>15.</b>	POL00338648	Email from Andrew Winn to Alison Bolsover RE: Branch visits with shex	POL-BSFF-0164369
<b>16.</b>	POL00184326	Email chain from Nick Beal to Adrian Wales and Angela Van-Den-Bogerd Re Sarah Burgess-Boyd, Starbeck Avenue PO	POL-BSFF-0022389
<b>17.</b>	POL00184327	Correspondences between Ronnie Campbell MP and Sarah Burgess-Boyde re Former Post Office Branch situated at 22 Starbeck Avenue	POL-BSFF-0022390
<b>18.</b>	POL00316792	Email from Jane Hill to Paula Vennells Mark Davies Alisdair Cameron & others cc Kevin Gilliland Martin Humphreys RE: Baroness Neville-Rolfe visit	POL-BSFF-0154842
<b>19.</b>	POL00099179	Email from Paula Vennells to Alice Perkins CB re The case for independence in the Post Office appeals system	POL-0098762
<b>20.</b>	POL00298435	Email from Paula Vennells to Pervez Nakvi, Angela Van-Den-Bogerd cc'd George Thomson and others re: Glitch in Horizon	POL-BSFF-0136485
<b>21.</b>	POL00086765	Network auditing approach, methods and assurance	POL-0083823
<b>22.</b>	POL00086831	POST OFFICE LTD EXECUTIVE COMMITTEE: Internal Audit Options	POL-0083889



<b>23.</b>	POL00379712	Email from Peter C Wilkinson to Kevin Gilliland, Michael Larkin and others re: Pulborough audit.	POL-BSFF-0206599
<b>24.</b>	POL00379713	Audit report of Post Office Pulborough branch to Elaine Ridge from Susan Swabey.	POL-BSFF-0206600
<b>25.</b>	POL00179484	Financial branch performance profile trial results	POL-BSFF-0017547
<b>26.</b>	POL00303045	Post Office Limited Matters: Dispute Resolution - Privileged and Confidential - Claims over £500K or Those of a Sensitive Nature	POL-BSFF-0141095
<b>27.</b>	POL00294717	Letter from Kevin Gilliland to Athwal re: letter to Paula Vennells	POL-BSFF-0132767
<b>28.</b>	POL00294705	Email from Tracy Marshall to Kevin Gilliland and Angela Van-Den-Bogerd re: Ferndown branch briefing doc	POL-BSFF-0132755
<b>29.</b>	POL00294706	Ferndown Post Office Branch Information Briefing	POL-BSFF-0132756
<b>30.</b>	POL00294743	Interview Notes - Ferndown branch - in confidence	POL-BSFF-0132793
<b>31.</b>	FUJ00224980	Email from Penny Thomas to Bains Rajbinder, Re: Fujitsu Logs for Ferndale	POINQ0231095F
<b>32.</b>	POL00294761	Letter from Kevin Gilliland to Angela Van-Den-Bogerd, Peter D Johnson cc'd Dave S Pettitt and others re: Val Athwal	POL-BSFF-0132811
<b>33.</b>	POL00294745	Email from Paula Vennells to Mike Granville, Kevin Gilliland, Angela Van-Den-Bogerd and others RE: BBC TV - Inside Out.	POL-BSFF-0132795
<b>34.</b>	POL00294746	Email from Nick Beal to Angela Van-Den-Bogerd re: BBC TV - Inside Out	POL-BSFF-0132796
<b>35.</b>	POL00120451	Email from Mike Granville to Kevin Gilliland, Paula Vennells, Mike young and others Re: FW: Inside Out programme. Contains Post Office Statement in regards to Horizon.	POL-0126141

<b>36.</b>	POL00294779	Email from Susan Crichton to Paula Vennells, Mike Granville, Kevin Gilliland and others re BBC Inside Out Programme	POL-BSFF-0132829
<b>37.</b>	POL00056782	Email from Sabrina Jethwa to Emily B Springford cc: Rebekah Mantle re: RE: Horizon - Wilson	POL-0053261
<b>38.</b>	POL00379142	Criminal Case Study - Email from Mike Granville to Mike Whitehead RE: information requested	POL-BSFF-0206029
<b>39.</b>	POL00294749	Email from Mike Granville to Kevin Gilliland, Paula Vennells, Mike Young and others re: Inside Out programme on BBC South last night	POL-BSFF-0132799
<b>40.</b>	POL00338518	Email chain from Mike Granville to Paula Vennells, Mike Young, Kevin Gilliland & others cc Rod Ismay, Alana Renner, Stuart Taylor RE: Inside Out Programme on BBC East on Horizon	POL-BSFF-0164239
<b>41.</b>	POL00120561	Email from Mike Granville to Paula Vennells, Mike Moores, Mike Young and others re: Update on JFSA and Horizon issues and urgent response needed for BIS and Report on JFSA response to issues for BIS	POL-0126174
<b>42.</b>	POL00176465	Email from Emily B Springford to Angela Van-Den-Bogerd, Lesley J Sewell, Mike Granville and others re: JFSA claims - disclosure and evidence gathering	POL-0171736
<b>43.</b>	POL00294896	Email from Rod Ismay to Paul Meadows, Rebekah Mantle and Emily B Springford re: JFSA - Delegated Authority for Key Decisions - Proposal - Legally Privileged and In Confidence	POL-BSFF-0132946
<b>44.</b>	POL00294897	Response to JFSA - Request for delegated authority as regards	POL-BSFF-0132947

		costs of legal action 14 October 2011	
<b>45.</b>	POL00338392	Email chain from Mike Granville to Hayley Fowell, Susan Crichton, Rebekah Mantle, David Simpson & others cc Mike Young, Kevin Gilliland, Sue Huggins & others RE: Private Eye inquiry - Horizon	POL-BSFF-0164113
<b>46.</b>	POL00363235_050	Email from David Simpson to Mike Young, Paula Vennells, CC Shane O'Riordain and others re: Horizon - Private Eye - concerning a magazine challenging the integrity of the Horizon IT system	POL-BSFF-0191195_050
<b>47.</b>	POL00294869	Memo from Rod Ismayu to Angela Van Den Bogerd and others on 12/10/11 re: JFSA and Shoosmiths / Access Legal - Response to Challenges - Proposed Steering Group and Purpose.	POL-BSFF-0132919
<b>48.</b>	POL00294969	Email from Paula Vennells to Shane O'Riordain, Mike Young, Susan Crichton and others re: For your attention from press cutting	POL-BSFF-0133019
<b>49.</b>	POL00378468	Email from Eunice Kirby to Eunice Kirby forwarding emails between Kevin Gilliland, Rod Ismay and Mike Granville - Re: FW: Plumstead High Street Post Office - J Singh	POL-BSFF-0205355
<b>50.</b>	POL00030217	Ernst & Young Management letter to POL for year ended 2011	POL-0026699
<b>51.</b>	POL00294829	(Final) Terms of Reference from Stephen A Collins to Susan Crichton cc Kevin Gilliland, Derek K Foster and others RE: POL - Review of Horizon System Controls	POL-BSFF-0132879
<b>52.</b>	POL00294906	Email from Paula Vennells to Lesley J Sewell cc'd Mike Young and Kevin Gilliland re:	POL-BSFF-0132956

		Horizon independent assessment	
<b>53.</b>	POL00029114	POL Draft Review of Key System Controls in Horizon: Assurance Review (Draft 11/005)	POL-0025596
<b>54.</b>	POL00030482	Post Office Limited Review of Key System Controls in Horizon, Assurance Review Report for March 2012	POL-0026964
<b>55.</b>	POL00339056	Email from Dave Hulbert to Kevin Gilliland, Alana Renner, Lesley J Sewell and others RE: IMPORTANT: Horizon service test today during Disaster Recovery test	POL-BSFF-0164777
<b>56.</b>	POL00129915	post office LTD Board - Outputs of the Fujitsu Services review of Horizon Online	POL-0123922
<b>57.</b>	POL00339652	Email from Lesley J Sewell to Kevin Gilliland Re: Horizon service - RE: Baughurst Post Office	POL-BSFF-0165373
<b>58.</b>	POL00114269	Post Office Limited - Extract from minutes of a Board meeting held on 19 September 2012.	POL-0113196
<b>59.</b>	UKGI00018115	POL Board - Post Office Technology - Risk and Resilience Review - by Lesley Sewell	UKGI028122-001
<b>60.</b>	POL00184071	Minutes of the network transformation programme board 21 November 2012	POL-BSFF-0022134
<b>61.</b>	POL00029713	Post Office Limited Assurance Review Report AR12/050 for December 2012	POL-0026195
<b>62.</b>	POL00340338	Follow up review of key system controls in POLSAP - Post office limited -Assurance review presentation slides	POL-BSFF-0166059
<b>63.</b>	POL00144659	Follow up review of Key System Control in POLSAP - POL- Draft Report - AR 12/037b	POL-BSFF-0003788
<b>64.</b>	POL00380822	Email from Sue Singh to Susan Crichton, Chris M Day, Kevin Gilliland and others. RE: Internal	POL-BSFF-0207709



		Audit & Risk Management AR 12.050a - Follow Up Review of Key System Controls in Horizon	
<b>65.</b>	POL00380823	Post Office Limited Assurance Review May 2013	POL-BSFF-0207710
<b>66.</b>	POL00162189	Email from Mark R Davies to Richard Z Walden and Nina Arnott. RE: Fwd: An important change to the Horizon support service - IT Transformation.	POL-0150629
<b>67.</b>	POL00143600	Email chain from Lesley Sewell to Dave Hulbert, Gina Gould re Baughurst PO	POL-BSFF-0002765
<b>68.</b>	POL00105483	Letter from Rt Hon James Arbuthnot MP (JA) to Ms Moya Greene & response letter re: Odiham Hampshire Post Office Closure	POL-0104663
<b>69.</b>	POL00096780	Email from Kevin Gilliland to Paula Vennells regarding James Arbuthnot correspondence	POL-0096363
<b>70.</b>	POL00096804	Email from Paula Vennells to Kevin Gilliland, Theresa Iles, Mark R Davies and others in re to James Arbuthnot correspondence	POL-0096387
<b>71.</b>	POL00105494	Email from Glenda C Hansen to Theresa Iles, Alwen Lyons and Lee Summers re: Rt Hon Oliver Lewin MP and Post Office Ltd's Horizon System	POL-0104674
<b>72.</b>	POL00105481	Notes of the Meeting with James Arbuthnot, Alice Perkins and Alwen Lyons	POL-0104661
<b>73.</b>	POL00417089	Email from Mike Whitehead to Peter Batten, RE: Will Gibson Meeting - Feedback/actions attaching Arbuthnot meetings communication plan.	POL-BSFF-0237240
<b>74.</b>	POL00142984	Email from Dave Pardoe to Jarnail A Singh, Helen Dickinson RE: Yetminster PO: Horizon	POL-BSFF-0002149
<b>75.</b>	POL00105490	Email from Alice Perkins to Glenda Hansen, RE: responses	POL-0104670



		to letters from MPs request for meeting.	
<b>76.</b>	POL00180807	Email from Paula Vennells to Mike Granville re Horizon in Confidence	POL-BSFF-0018870
<b>77.</b>	POL00030365	Post Office Limited Board of Directors Meeting Minutes of 22/09/2011	POL-0026847
<b>78.</b>	POL00294748	Email from Mike Granville to Kevin Gilliland, Angela Van-Den-Bogerd, Paula Vennells and others re: NFSP line on Horizon	POL-BSFF-0132798
<b>79.</b>	POL00372043	Email from George Thomson to Paul Vennells, Kevin Gilliland, Susan Barton and others re: Fwd: Horizon Interim Report	POL-BSFF-0199436
<b>80.</b>	POL00296010	Email from George Thomson to Nick Beal, cc'd Kevin Gilliland and Paula Vennells re PRINTED Fwd: Horizon Investigation.	POL-BSFF-0134060
<b>81.</b>	POL00296011	Letter from Alan Bates to George Thompson re Post Office Horizon System Problems	POL-BSFF-0134061
<b>82.</b>	POL00348119	Email chain from Paula Vennells to Neil Hayward, Nick Beal, Kevin Gilliland and others re: The NFSP/A few 'think digital' thoughts	POL-BSFF-0173840
<b>83.</b>	POL00150720	Email from Kevin Gilliland to Nick Beal, CC Neil Hayward and Mark R Davies and others re: NFSP update - concerning Grant Agreement	POL-BSFF-0009832
<b>84.</b>	POL00151913	National Federation of Subpostmasters Annual Conference 2015- briefing areas	POL-BSFF-0011025
<b>85.</b>	POL00027276	Post Office Group Executive Agenda 14/9/2017 and associated documents	POL-0023917
<b>86.</b>	NFSP00000454	NFSP report of a meeting of the National Executive Council on 10 - 12 October 2011	VIS00008912

<b>87.</b>	POL00295389	Email chain from Alwen Lyons to George Thomson, cc'd Paula Vennells and Kevin Gilliland - Re: Re: Fwd: Ref; Thorney Post Office, 5 Abbey Place PE6 , Computer Systems failure.	POL-BSFF-0133439
<b>88.</b>	POL00295392	Email from George Thomson to Paula Vennells, Kevin Gililand, Nick Beal re PRINTED Fwd: SubPostmasters class action against the Post Office - possible evidence regarding Horizon errors etc.	POL-BSFF-0133442
<b>89.</b>	POL00295393	Email from George Thomson to Paula Vennells, Kevin Gililand, Nick Beal re PRINTED Fwd: Horizon System.	POL-BSFF-0133443
<b>90.</b>	POL00295394	Email from George Thomson to Paula Vennells, Kevin Gililand, Nick Beal re PRINTED Fwd: Press enquiry on Horizon.	POL-BSFF-0133444
<b>91.</b>	POL00295395	Email from Alwen Lyons to Craig Tuthill, Angela Van-Den-Bogerd RE: Thorney post office, 5 Abbey Place PE6, computer systems failure	POL-BSFF-0133445
<b>92.</b>	POL00105607	Email from Kevin Gilliland to Dave Hulbert re: NFSP Session - discusses need to POL to retain NFSP support	POL-0104581
<b>93.</b>	POL00152168	Email from Kevin Gilliland to Nick Beal CC'ing Mark Davies, Roger Gale and others RE: Media coverage on Post Office and Horizon - BBC Panorama programme	POL-BSFF-0011280
<b>94.</b>	POL00021508	Meeting minutes: Board meeting minutes for meeting held on 4th July 2012	POL0000041
<b>95.</b>	POL00167447	Post Office Limited - Meeting Minutes of the Board Meeting of Post Office Ltd	POL-0162744
<b>96.</b>	POL00358173	Post Office statement on findings on interim report into Horizon computer	POL-BSFF-0183894

		system	
<b>97.</b>	POL00192104	Email from Jackie Meylak To: Nick Beal re FW: Regular Call re Horizon Issues	POL-BSFF-0030167
<b>98.</b>	POL00207756	Email from Belinda Crowe to Martin George, Chris M Day, Mark R Davies and others re: Fwd: Second Sight Part Two report	POL-BSFF-0045819
<b>99.</b>	POL00207757	Second Sight Briefing Report – Part Two	POL-BSFF-0045820
<b>100.</b>	POL00101299	Email from Mark R Davies to Neil Hayward, Nicholas Kennett, Chris Aujard and others re Sparrow - BBC North story	POL-0100882
<b>101.</b>	POL00190338	Email chain from Martin Edwards to Chris M Day, Kevin Gilliland, Susan Barton & others cc Paula Vennells, Susan Crichton, Mark R Davies Re: JA meeting brief	POL-BSFF-0028401
<b>102.</b>	POL00190341	POL Second Sight review into Horizon - briefing note on interim report.	POL-BSFF-0028404
<b>103.</b>	POL00341624	Email from George Thompson to Paula Vennells to Kevin Gilliland, Susan Barton and others re: Post Office dispute: Urgent 9 July 2013	POL-BSFF-0167345
<b>104.</b>	POL00029663	Email from Lesley J Sewell to Paula Vennells, cc'ing Kevin Gilliland, Susan Crichton and others, re: Case Study.	POL-0026145
<b>105.</b>	POL00099702	Email from Theresa Iles to Alwen Lyons, Chris M Day, Fay Healey and others RE: FW: Example Applications	POL-0099285
<b>106.</b>	POL00294482	Email from Gayle A Peacock to Angela Van-Den-Bogerd, Anne Allaker, Peter Prior-Mills and others re: Branch Support Programme - Work Stream meeting - Papers	POL-BSFF-0161719

<b>107.</b>	POL00294483	Email from Branch Support Programme - Work stream meeting - Thursday 31st July 2014	POL-BSFF-0161720
<b>108.</b>	POL00040032	Post Office- Lessons Learned Review of handling of alleged issues/concerns about Horizon: Terms of Reference	POL-0036514
<b>109.</b>	POL00021520	Meeting Minutes: Board meeting minutes for meeting held on 27th November 2013	POL0000053
<b>110.</b>	POL00100193	Post Office Audit - Risk and Compliance Committee - Prosecutions Policy	POL-0099776
<b>111.</b>	POL00130502	Email chain from Kevin Gilliland to Alwen Lyons cc'ing Chris Aujard, Chris Day and others re: Prosecution Policy Paper	POL-0124092
<b>112.</b>	POL00030900	Meeting Agenda for the Audit, Risk and Compliance Sub-Committee, including paper on the Post Office's Prosecuting Policy	POL-0027382
<b>113.</b>	POL00306425	Post Office Limited Executive Committee Agenda Meeting September 2014	POL-BSFF-0144475
<b>114.</b>	POL00149190	Executive Committee Agenda for the meeting to be held on 16 October 2014 in Room 501	POL-BSFF-0008310
<b>115.</b>	POL00038819	Post Office Executive Committee Agenda for meeting held on 13th November 2014 and associated documents	POL-0027705
<b>116.</b>	POL00109859	Post Office Agenda for the meeting to be held on 15 January 2015	POL-0111095
<b>117.</b>	POL00145553	Emails between Angela Van-Den-Bogerd and others RE: Nelson Post Office Mid Glamorgan Horizon technical issues.	POL-BSFF-0004680
<b>118.</b>	POL00145530	Email from Kevin Gilliland to Susan Crichton cc'd Alwen Lyons re: For Action:	POL-BSFF-0004657



		Ref: ECT 524/13 Customer name: Anna Skoczen Feedback due: 19/7/13 Case signatory: ? Lin Norbury	
119.	POL00327004	Email from John Breeden to KB Owen re Urgent - FW: FOR ACTION: Ref: ECT 524/13 Customer name: Anna Skoczen Feedback due: 19/7/13 Case signatory: ? Lin Norbury	POL-0173455
120.	POL00125022	Email from John Breeden to Mike Granville cc: Craig Tuthill, Susan Crichton, and other Re: Appeals Process	POL-0131788
121.	POL00125023	POL Subpostmaster Appeal Panel Process Review	POL-0131789
122.	POL00341652	Subpostmaster Appeals Panel Process	POL-BSFF-0167373
123.	POL00116059	Statement in relation to the Bishopston Post Office	POL-0117061
124.	POL00145419	Email from Paula Vennells to Susan Crichton and Kevin Gilliland re: Fwd: The case for independence in the Post Office appeals system	POL-BSFF-0004546
125.	POL00089711	Branch Support Programme – Terms of Reference v.2	POL-0086686
126.	POL00203724	Branch support programme update - network and sales lead team meeting.	POL-BSFF-0041787
127.	POL00369484	Project Initiation Document Template v1.04	POL-BSFF-0192901
128.	POL00304377	Email from Angela Van-Den-Bogerd to Sharon Bull, Ian Kennedy, Alison Thompson and others re: RE: Branch Support Programme - Business Case - Request for Concurrence by lunchtime Thursday 8th May	POL-BSFF-0142427
129.	POL00312231	Email from Jackie Meylak to Angela Van-Den-Bogerd RE;GE Actions	POL-BSFF-0150281
130.	POL00148920	Post Office Business Support Programme Terms of Reference	POL-BSFF-0008040
131.	POL00374418	Branch Support Programme - Steering Group Meeting	POL-BSFF-0201811



<b>132.</b>	POL00039217	Branch support programme DRAID Log (dependencies, Risks, Actions, Issues Database	POL-0035699
<b>133.</b>	POL00374558	Branch Support Programme : Programme Board - "to be" processes PPT	POL-BSFF- 0201951
<b>134.</b>	POL00091483	Post Office Branch Support Programme - Work Stream Meeting Presentation Slides	POL-0091046
<b>135.</b>	POL00407938	Email from Gayle Peacock to Belinda Crowe, Angela Van- Den-Bogerd, Jackie Meylak & Ors RE: Up to date for Exco - inclusion of branch support programme with sparrow	POL-BSFF- 0231936
<b>136.</b>	POL00407939	Post office ltd - executive committee branch support programme	POL-BSFF- 0231937
<b>137.</b>	POL00374655	Email from Gayle A Peacock to Kevin Gilliland CC: Angela Van- Den-Bogerd RE: Branch Support Programme Steering Group pack	POL-BSFF- 0202048
<b>138.</b>	POL00374656	Meeting Minutes on Branch Support Programme	POL-BSFF- 0202049
<b>139.</b>	POL00349923	Email from Angela Van-Den- Bogerd to Alwen Lyons, Kevin Gilliland cc Jackie Meylak Re: Branch Support Programme Update paper for ExCo	POL-BSFF- 0175644
<b>140.</b>	POL00349924	Post Office Ltd Executive Committee Branch Support Programme	POL-BSFF- 0175645
<b>141.</b>	POL00220938	Email from Craig Tuthill to Kevin Gilliland, Angela Van-Den- Bogerd, Nick Beal and others re: Branch Support Programme - Steering Group Meeting	POL-BSFF- 0059001
<b>142.</b>	POL00220939	Branch Support Programme Steering Group Meeting.	POL-BSFF- 0059002
<b>143.</b>	POL00446790	Post Office Group Executive - Branch Support Programme Improvements Update (Confidential) - Report	POL-BSFF-102- 0000044

<b>144.</b>	POL00374441	Email from Gayle A Peacock to Kevin Gilliland, Angela Van Den Bogerd - Re: Submission of Branch Support Programme for Transformation Committee	POL-BSFF-0201834
<b>145.</b>	POL00374442	Branch Support Transformation Programme	POL-BSFF-0201835
<b>146.</b>	POL00374443	Branch Support Programme Performance Narrative By Gayle Peacock – Transformation Committee - Narrative on Branch Support Programme Slide	POL-BSFF-0201836
<b>147.</b>	POL00374556	Branch Training and Support Programme PPT	POL-BSFF-0201949
<b>148.</b>	POL00374750	Email from Gayle A Peakcock to Kevin Gilliland and Angela Van-Den-Bogerd Re: Slide deck for Friday	POL-BSFF-0202143
<b>149.</b>	POL00374850	Email from Gayle A Peacock to Kevin Gilliland and Angela Van-Den-Bogerd RE: Transformation Committee Slides for 4th September Meeting	POL-BSFF-0202243
<b>150.</b>	POL00374851	Branch Support Transformation Programme	POL-BSFF-0202244
<b>151.</b>	POL00374852	Transformation Committee August 2014 narrative	POL-BSFF-0202245
<b>152.</b>	POL00374853	Branch Support Dashboard 2014	POL-BSFF-0202246
<b>153.</b>	POL00210245	Post Office Transformation Committee Agenda and Overview presentation for 9th October 2014	POL-BSFF-0048308
<b>154.</b>	POL00414076	Post Office Ltd Board Meeting between Nick Kennett, Chris Aujard, Chris Day and others.	POL-BSFF-0234189
<b>155.</b>	POL00300065	Executive Committee Agenda.	POL-BSFF-0138115
<b>156.</b>	POL00027399	Post Office Executive Committee Agenda	POL-0024040

<b>157.</b>	POL00027377	Post Office Agenda: Executive Committee meeting held on 3rd July 2014 and associated documents	POL-0024018
<b>158.</b>	POL00207432	Executive committee agenda for the meeting to be held on 19 August 2014 in Room 501	POL-BSFF-0045495
<b>159.</b>	POL00027358	Post Office Agenda: Executive Committee meeting 11th September 2014 and associated documents	POL-0023999
<b>160.</b>	POL00149531	POL Executive Committee Agenda - present Paula Vennells (Chair), Gavin Lambert, Mark Davies & others.	POL-BSFF-0008651
<b>161.</b>	POL00214660	Executive committee agenda	POL-BSFF-0052723
<b>162.</b>	POL00351813	Group executive agenda	POL-BSFF-0177534
<b>163.</b>	POL00151514	Group Executive Agenda for the meeting to be held on 12th March 2015 in Boardroom, Room 501, Old Street	POL-BSFF-0010626
<b>164.</b>	POL00130901	April 2015 Group Executive Agenda PO - Paula Vennells chairing Nail Hayward, Martin George and Others present from 16/04/2015	POL-0120776
<b>165.</b>	POL00103259	Email from Jane MacLeod to Tim Parker, Carla Stent, Richard Callard and others, RE: PO Ltd-Supply Chain Litigation-Confidential and subject to legal privilege- do not forward	POL-0102842
<b>166.</b>	POL00104259	Post Office Ltd Board Noting Paper: Lessons Learned – Second Sight Investigation into Horizon Author: Belinda Crowe	POL-0103842
<b>167.</b>	POL00205259	Post Office Ltd Initial Complaints Review and Mediation Scheme: The way forward	POL-BSFF-0043322
<b>168.</b>	POL00205260	Sparrow Sub-Committee Scheme briefing - 9 June 2014 DRAFT NOT POLICY	POL-BSFF-0043323
<b>169.</b>	POL00027747	Email from Alwen Lyons to Chris M Day, David Ryan, Paula Vennells and	POL-0024388

		others RE: FW: Sparrow Update	
<b>170.</b>	POL00150165	Email chain from Angela Van Den Bogerd to Mark R Davies and Belinda Crowe cc'ing Rodric Williams and others RE: BBC - One Show	POL-BSFF-0009283
<b>171.</b>	POL00150616	Mediation Scheme: What You Need To Know	POL-BSFF-0009728
<b>172.</b>	POL00027739	Email from Mark R Davies to Paula Vennells, Chris Aujard, Alisdair Cameron and others RE: Sparrow Update	POL-0024380
<b>173.</b>	POL00117078	Email from Mark R Davies to Paula Vennells, Martin George, Neil Hayward and others re Sparrow update, including in relation to BIS Select Committee, Second Sight, and CCRC	POL-0117912
<b>174.</b>	POL00210081	Email from FOITEAM to Chris Aujard, Kevin Gilliland re: requests for recorded information under the FOIA - confidential Second Sight report leaked to BBC.	POL-BSFF-0048144
<b>175.</b>	POL00349860	Email from FOI Team to Chris Aujard, Kevin Gilliland and Chris M Day RE: Request for information under the Freedom of Information Act- Costs of Second Sight Report II	POL-BSFF-0175581
<b>176.</b>	POL00225651	Email from FOI Team to Jane MacLeod, cc'd Mark R Davies and Kevin Gilliland - Re: Request for information under the Freedom of Information Act - Second Sight Report II	POL-BSFF-0063714
<b>177.</b>	POL00353617	Email from FOI Team to Jane MacLeod, Kevin Gilliland and Mark R Davies re: Request for information under the Freedom of Information Act - SS Report II and Post Office's Response	POL-BSFF-0179338
<b>178.</b>	POL00352489	Email from Alwen Lyons to Alice Perkins, Neil Wilkinson, Virginia Holmes and	POL-BSFF-0178210



		others Re: Sparrow email to the Board	
<b>179.</b>	UKGI00003629	Email from Alwen Lyons to Alice Perkins, Neil McCausland, Virginia Holmes and others Re: Additional Sparrow email to the Board	UKGI014443-001
<b>180.</b>	UKGI00003691	Email thread from Alwen Lyons to Alice Perkins, Neil McCausland, Alasdair Marnoch and others RE: Sparrow - update to Board and GE	UKGI014505-001
<b>181.</b>	POL00224273	Mark R Davies to Melanie Corfield, Jane Hill & Ruth Barker RE: Sparrow media and Parliament	POL-BSFF-0062336
<b>182.</b>	POL00223299	Branch Support Programme. Steering Group Meeting. Discusses update on action from previous meeting, status updates, progress against work streams, risks and issues	POL-BSFF-0061362
<b>183.</b>	POL00206989	Email from Rob Bolton To: Martin George, Kevin Gilliland, David Ryan and others re Risk & Compliance Committee Minutes - 21st July 2014	POL-BSFF-0045052
<b>184.</b>	POL00206990	Post Office Ltd Risk and Compliance Committee Meeting Agenda	POL-BSFF-0045053
<b>185.</b>	POL00196100	Email from Paula Vennells to Angela Van Den Bogerd to Kevin Gililand, Alwen Lyons, Martin Edwards and others re Martin Griffiths/Sparrow.	POL-BSFF-0034163
<b>186.</b>	POL00116133	Email from Mark Davies to Paula Vennells, Susan Crichton, Angela Van-Den-Bogerd and others re: Martin Griffiths.	POL-0117132
<b>187.</b>	POL00300096	Email from Paula Vennells to Kevin Gililand, Fay Healey, Mark Davies re Martin Griffiths.	POL-BSFF-0138146



<b>188.</b>	POL00393539	Email from Fay Healey to Kevin Gilliland, Cc'd Alwen Lyons, Hugh Flemington and others Re: Martin Griffiths death	POL-BSFF-0228377
<b>189.</b>	POL00381972	Email from Angela Van-Den-Bogerd to Martin Edwards, Kevin Gilliland and others re: following conversation with Glenn on Monday.	POL-BSFF-0208859
<b>190.</b>	POL00196407	Email chain from Mark Davies to Rodric Williams Kevin Gilliland Angela Van-Den-Bogerd & others RE: Stephen Mosley MP: Martin Griffiths	POL-BSFF-0034470
<b>191.</b>	POL00196410	Letter from Stephen Mosley MP to Jo Swinson MP Re: Correspondence received from Mr Alan Bates from JFSA regarding his concerns relating to the suicide attempt of Mr Martin Griffiths	POL-BSFF-0034473
<b>192.</b>	POL00101340	Email from Kevin Gilliland to Mark R Davies, Paula Vennells, Alwen Lyons and others Re: Post Office IT system criticised in report - BBC News	POL-0100923
<b>193.</b>	POL00101353	Email from Mark Davies to Neil Hayward, Kevin Gilliland, Martin Edwards and others re: Post Office IT system criticised in report - BBC News	POL-0100936
<b>194.</b>	POL00101632	Email from Mark Davies to Paula Vennells and Alwen Lyons regarding Sparrow update	POL-0101215
<b>195.</b>	POL00101761	Email from Mark R Davies to Alwen Lyons, Paula Vennells, Kevin Gilliland and others re: Sparrow update	POL-0101344
<b>196.</b>	POL00385837	Email from Mark R Davies To: Paula Vennells, Chris Day, Chris Aujard & Ors RE: Sparrow media	POL-BSFF-0212724
<b>197.</b>	POL00308946	Email from Mark R Davies to Alwen Lyons, Paula Vennells, Nichloas Kennett	POL-BSFF-0146996

		and others RE: Sparrow	
<b>198.</b>	POL00101983	Email from Mark R Davies to Paula Vennells, Neil Hayward, Martin George and others re: Sparrow	POL-0101566
<b>199.</b>	POL00102395	Email from Mark R Davies to Paula Vennells, Alisdair Cameron, Neil Hayward and others - Re: Sparrow	POL-0101978
<b>200.</b>	POL00116922	from Paula Vennells to Nicholas Kennett, Martin George, Kevin Gilliland and others re: Fwd: One show	POL-0117777
<b>201.</b>	POL0033339	Email from Paula Vennells to Mark R Davies, Neil Hayward, Martin George and others RE: Sparrow	POL-0179748
<b>202.</b>	POL00151835	Email chain from Kevin Gilliland to Mark R Davies cc Paula Vennells, Jane MacLeod, Gavin Lambert Re: Note to network	POL-BSFF-0010947
<b>203.</b>	POL00162429	Email from Kevin Gilliland to Mark Davies cc Roger Gale, Michael Larkin and others RE: Panorama	POL-0150838
<b>204.</b>	UKGI00005157	Email chain from Paula Vennells to Alice Perkins cc Alwen Lyons, Neil McCausland 'and others' RE: BBC 2 Documentary	UKGI015971-001
<b>205.</b>	POL00158683	Email from Ellie B Austin to Alana Renner, Alasdair Marnoch, Alice Perkins, Alwen Lyons and others RE: Your Daily Digest - Wednesday 10 September	POL-0147259
<b>206.</b>	POL00387685	Email from Paula Vennells to Kevin Gilliland, Mark R Davies, Tom Wechsler and others. RE: Media coverage for The Post Office: The Post Office, 23052015 (05:26)	POL-BSFF-0214572
<b>207.</b>	POL00308162	Email from Keith Bridges To: Andrew Winn and CC: Sarah Lambert, Mark Irvin re Hurst Hill	POL-BSFF-0146212

<b>208.</b>	POL00308163	Spreadsheet of Copy of 311 of Concurrence report	POL-BSFF-0146213
<b>209.</b>	POL00152655	Email from Ian to NBSC Enquiries cc Paula Vennells, Kevin Gilliland, George Thomson and others RE: Transaction Corection	POL-BSFF-0011767
<b>210.</b>	POL00233039	Email from Ian Morton to NBSC, Kevin Gilliland, and cc'd Paula Vennells - Re: Horizon Error	POL-BSFF-0071102
<b>211.</b>	POL00344065	Email from Dave Hulbert to Lesley J Sewell re: Fw: Update Wednesday 09:00am - Histon post office INC0003137	POL-BSFF-0169786
<b>212.</b>	POL00102042	Email from Avene O Farrelle to Angela Van-Den-Bogerd, ECT, FlagCaseAdvisor and others Re: Probably too late now	POL-0101625
<b>213.</b>	POL00350031	Email from Kevin Gilliland to Angela Van-Den-Bogerd cc Jackie Meylak RE: BSP - CAF for approval	POL-BSFF-0175752
<b>214.</b>	POL00308241	Email from Angela Van-Den-Bogerd to Gavin Lambert, Ian Thomas Re: Horizon Fault - Urgent repsonse please - complaint from Debenham PO Branch FAD 2331306	POL-BSFF-0146291
<b>215.</b>	POL00150177	Email chain from Paula Vennells to Haydi O'Brien, cc'd Angela Van-Den-Bogerd, Kevin Gilliland and bcc another re Griffithstown 342632	POL-BSFF-0009295
<b>216.</b>	POL00314060	Email from Angela Van-Den-Bogerd to Avene O'Farrell Re: Scratchcards - Aston on Trent Post Office	POL-BSFF-0152110
<b>217.</b>	POL00353200	Email from Kevin Gilliland to Angela Van Den Bogerd re: Re: Postmaster IS error	POL-BSFF-0178921
<b>218.</b>	POL00150182	Email chain including Kevin Gilliland (POL); Paula Vennells (POL); Haydi O'Brien (POL) Re: Griffithstown	POL-BSFF-0009300

<b>219.</b>	POL00151726	email from Paul Swanton to Mark R Davies re Horizon Help	POL-BSFF-0010838
<b>220.</b>	POL00174666	Letter from Nisha Kaur to Paula Vennells. RE: difficulties with employment with Post Office	POL-0168849
<b>221.</b>	POL00355475	Email from Andrew Carpenter to Kevin Gilliland, Michael Larkin, Angela Van Den Bogerd and others - RE: Crichton Avenue - 2793490 - YO30 6HB UPDATE2	POL-BSFF-0181196
<b>222.</b>	POL00119501	Letter from MP Rachael Maskell to Kevin Gilliland Re: Crichton Ave Post Office	POL-0119813
<b>223.</b>	POL00154419	Letter from Kevin Gilliland of Post Office Ltd to Rachel Maskell MP - York Central re Crichton Avenue Post Office	POL-BSFF-0013518
<b>224.</b>	POL00251201	Letter from Kevin Gilliland OBE to MMs Jennifer Joannon J.P. re: response to previous letter dated on 07/01/2017	POL-BSFF-0089264
<b>225.</b>	POL00423866	Email from flagcaseadvisor to Thomas P Moran, Mark Ellis, Neil Ennis and others RE: FOR ACTION: ECT 1723/16(JW) Martin Summers, Postmaster Feedback due	POL-BSFF-0238681
<b>226.</b>	POL00423867	Letter from Martin Summers (Whitchurch Post Office) to Paula Vennells re: Experience of working with the Post Office	POL-BSFF-0238682
<b>227.</b>	POL00344413	Email from Kevin Gilliland to Rebecca Barker and cc'd Gina Gould, Lesley J Sewell and others re: Re: Michele Middleditch - Baughurst	POL-BSFF-0170134
<b>228.</b>	POL00373817	Email from Paula Vennells to Chris M Day, Kevin Gilliland and CC'ing Martin Edwards and other RE: Culture/Pervez incident	POL-BSFF-0201210



<b>229.</b>	POL00249601	Email from Kevin Gilliland to Paula Vennells cc Avene Regan, Martin Edwards and others RE: Quarry Bank - request from Margot's office about the status of the new branch & Horizon	POL-BSFF-0087664
<b>230.</b>	POL00376515	Email from Paula Vennells to Jane Hill, Kevin Gilliland, Mark R Davies & Ors RE: Baroness Neville-Rolfe visit	POL-BSFF-0203908
<b>231.</b>	POL00152132	Email from Kevin Gilliland to Paula Vennells cc Jane Hill, Mark R Davies, Mike Granville and others RE: Baroness Neville-Rolfe visit	POL-BSFF-0011244
<b>232.</b>	POL00162422	Email from Mark R Davies to Kevin Gilliland, Martin George, Neil Hayward and others. RE: Minister meeting.	POL-0150832
<b>233.</b>	UKGI00001074	Briefing from Laura Thompson to Baroness Neville-Rolfe re Meeting with Paula Vennells, Post Office Limited CEO	VIS000009212
<b>234.</b>	UKGI00004900	Email from Paula Vennells to Alice Perkins, Virginia Holmes, Tim Franklin and others re: Baroness Neville-Rolfe Scanned doc - negotiating with the CWU and Unite	UKGI015714-001
<b>235.</b>	POL00103302	Email from Jane MacLeod to Tim Parker, Ken McCall, Carla Stent et, RE: Subject to privilege- Postmaster litigation: GLO Application	POL-0102885
<b>236.</b>	POL00391120	Email from Mark R Davies to Alisdair Cameron, Alwen Lyons and others re: Communications weekly update - key messages attached.	POL-BSFF-0218007
<b>237.</b>	POL00247182	POL Audit, Risk and Compliance Committee meeting minutes.	POL-BSFF-0085245
<b>238.</b>	POL00251520	Post Office Ltd – Confidential - Group Executive - meeting	POL-BSFF-0089583



<b>239.</b>	POL00024700	Email from Jane MacLeod to Mark Ellis, Mark Davies and others re: URGENT - Postmaster litigation -strategic options for CMC	POL-0021179
<b>240.</b>	POL00250687	Email from Jane MacLeod to Paula Vennells, Alisdair Cameron, Kevin Gilliland and others Re: Postmaster Litigation - Update tomorrow morning CONFIDENTIAL AND SUBJECT TO LEGAL PRIVILEGE – DO NOT FORWARD	POL-BSFF-0088750
<b>241.</b>	POL00250688	Postmaster Litigation Executive Summary	POL-BSFF-0088751
<b>242.</b>	POL00391185	Email from Jane MacLeod to Paula Vennells, Kevin Gilliland re: FW Freeths	POL-BSFF-0218072
<b>243.</b>	POL00248687	Email from Rodric Williams to: Melanie Corfield, Andrew Parsons, CC: Mark Underwood1 re FW: Freeths	POL-BSFF-0086750
<b>244.</b>	POL00250878	Q&A Re: Kevin Gilliland and other Post Office Matters	POL-BSFF-0088941