

Private and Confidential

Sir Wyn Williams,
Chair of the Post Office Horizon IT Inquiry
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OUR REF

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YOUR REF

17 November 2022

By email: Solicitor@postofficehorizoninquiry.org.uk

Dear Sir Wyn

Proposed Amendment of the List of Issues

We are writing as the Recognised Legal Representative for the National Federation of Sub-Postmasters (NFSP), one of the Core Participants in the Inquiry. The NFSP respectfully wishes to raise some points regarding the List of Issues for the Inquiry and related terminology which the NFSP has noted is used during the Inquiry hearings.

While it is appreciated that a hearing on the List of Issues took place on 8th November 2021 and the List of Issues was updated on 17th November 2021, the NFSP wishes to make a request that the List of Issues be amended to encompass *all* those who were victims of the defective Horizon System. This amendment would be to include reference to 'Post Office employees'. The NFSP notes that throughout the List of Issues, reference is made to sub-postmasters (SPMs), managers and assistants. As set out in the NFSP's Opening Statement delivered on 13th October 2022 at paragraph 4 (SUBS0000008), as a result of information obtained by a Freedom of Information request, it is understood that approximately 56% of those prosecuted since 1999 were postmasters, with the other 44% of those prosecuted being assistants and Post Office employees.

As indicated in the NFSP's Opening Statement, the NFSP is concerned that the current references in the List of Issues could lead to an incomplete public understanding of the risk posed to *anyone* who worked in a post office during the relevant period. On behalf of the NFSP we respectfully request that where "SPMs, managers and assistants" are referred to in the List of Issues, this be amended to "SPMs, managers, assistants, and Post Office employees."

The NFSP has noted that throughout questioning by those who ask questions of witnesses, the reference is consistently made to 'postmasters' or 'sub-postmasters', including by those who represent larger groups of Core Participants. As the use of 'postmaster' or 'sub-postmaster' does not accurately reflect the wide group of those affected by or who were victims of the Horizon IT system, the NFSP would request that

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consideration be given to amending the wording in questioning to cover the wider group of people who were affected. In using 'postmaster' and/or 'sub-postmaster' only, the NFSP is concerned that the public perception and reporting from the Inquiry tends to suggest that all of these prosecuted or otherwise affected were postmasters and therefore members of the NFSP, when that is not the case, given that 44% of those prosecuted were not postmasters or sub-postmasters and were members of other organisations.

The NFSP seeks to assist the Inquiry in any way that it can. However, despite the fact that 44% of those prosecuted were not members of the NFSP and were members of other trade unions/representative organisations, there has been considerable negative social media and specialist magazine coverage from the Inquiry against the NFSP. The question of the terminology and recognition of the others who were involved and suffered is therefore considered to be of importance.

We appreciate that the Completed List of Issues has been in place for a year, however this recent publicity focused on the NFSP has highlighted that an inaccurate public perception may arise, and which could be remedied by including 'Post Office employees' in the List of Issues and alternative wording in questions to encompass the broad range of those who worked in a post office and with the Horizon IT system.

We are grateful for the consideration of the points raised in this letter and if we can be of further assistance to the Inquiry regarding the above, please let us know. We otherwise look forward to hearing from the Inquiry.

Yours sincerely

GRO

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