

Thursday, 6 June 2024

(9.45 am)

ALICE ELIZABETH PERKINS (continued)

Questioned by MR BEER (continued)

SIR WYN WILLIAMS: Mr Beer.

MR BEER: Thank you, sir.

Good morning, Ms Perkins.

A. Morning.

Q. Yesterday we were examining the extent to which some material did not get disclosed to, or summarised for, the Board. I just want briefly to examine whether there were other things going on in the business in relation to Fujitsu that may be relevant to why that disclosure or summary did not occur and to get your assistance on this if possible.

Can we look, please, at POL00297877. If we scroll down, please, this is an email from Tim Franklin to Alwen Lyons, copied to you. Can you help us, Tim Franklin?

A. I haven't seen this email before -- this email exchange before, I don't think.

Q. I think you have?

A. You think I have?

Q. It's part of the pack, yes.

A. Okay, I'll take your word for it.

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much we have tried to play hardball with them, but I would hope that these numbers represent our maximum financial exposure, and that we will seek to negotiate below this. If they want a future role in our IT estate, they should want to be less exploitative of us now."

Is what we read there about the relationship, or Mr Franklin's view of the relationship, between Post Office and Fujitsu representative or indicative of the Board's view of the relationship between Post Office and Fujitsu at that time, which is July 2013?

A. Yes, I think so and I would say, you know, over a longer period.

Q. Did you ever link this, what's said here, back to your initial discussion with Angus Grant back in September 2011, where he told you, I think, that the relationship was too nice and that the Post Office had been naive or too naive? Was that a constant, essentially, over that period of time, September '11 to July '13?

A. Absolutely, all the way through, I would say. I think that, as the different non-executives came on Board, they, you know, reached the same view. We all wanted to move away from Fujitsu altogether and, when I left the Post Office in 2015, I believed that that is indeed what would be happening but it subsequently turned out that

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Q. But anyway.

A. Tim Franklin was one of the Non-Executive Directors on the Board.

Q. Thank you. He says, "Chris", which presumably is Chris Day.

A. Yeah, I would think so, yes.

Q. "... thanks for the updated information relating to the IT Transitional Services Agreement."

Can you recall what that was?

A. I think this is to do -- if I'm right about this, this is to do with the fact that we were -- we believed that we were going to be transitioning away from Fujitsu to a different provider but it was going to be difficult to manage that transition and, over the period in question, we had to extend the arrangement with Fujitsu to provide us with, if you like, a kind of bridge to the new arrangements. I think that's how I would describe it.

Q. I see:

"I am in agreement with the proposal as I don't see we have any choice. Horizon is a complex Fujitsu proprietary system and any move other than renewal would present unacceptable risk. I agree with Lesley's future review and the potential to mitigate our Fujitsu dependency in the future. I do feel like they have us over a barrel, and that they know it. I'm not clear how

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they were unable to extricate themselves.

Q. Was this any cause for concern, this understanding of a relationship of dominance or an unequal power relationship in circumstances where the Post Office was continuing to rely on Fujitsu for data and analysis to support its work with Second Sight?

A. So I think the concerns were definitely about an imbalance of power and, yes, I think we were sceptical; we were sceptical about all sorts of aspects of the Horizon -- of the relationship with Fujitsu.

Q. This records that the system was complex and proprietary --

A. Yeah.

Q. -- and that Fujitsu had the Post Office over a barrel. Was that a relationship that the Post Office had essentially inherited from Royal Mail Group?

A. I think so, yes. I mean, certainly, that was how I felt. Whether I would have said they had -- I think I might have said they had us over a barrel. I certainly came to that view early on and I now understand that it did -- you know, it did go back really from the very, very outset but I didn't understand that at the time.

Q. Against that background, how would you assess the executives' feeling about delivering news to the Board

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1 that a Fujitsu expert, who had given evidence, written
2 and oral, in criminal proceedings, was considered to be
3 tainted or an unsafe witness and had breached their
4 duties to the court in a manner which may have caused
5 prosecutions brought by both Royal Mail Group and Post
6 Office to have been undermined?

7 **A.** Could you go back to the beginning of the question,
8 sorry?

9 **Q.** Yes. How would the executives have felt about
10 delivering news to the Board --

11 **A.** Yes, okay, yes.

12 **Q.** -- that a Fujitsu expert witness may have given false
13 evidence to courts?

14 **A.** Well, I think that a number of the executives shared the
15 Board's view about -- I mean, obviously they wouldn't
16 have said they thought that Fujitsu had got them over
17 a barrel but my understanding was that the senior
18 executives were in agreement with the Board that we
19 wanted to move away from Fujitsu. I think everybody
20 shared that aspiration. So --

21 **Q.** What I'm trying to explore is whether this may be
22 a reason or relevant to the non-revelation of
23 information to the Board?

24 **A.** So I think what I'm trying to get to here is, since
25 everybody was agreed that we'd rather not have Fujitsu

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1 for; and what have we been doing to fulfil our
2 obligations under our policies?

3 "2) Are we safe from legal challenge in what we
4 are/have been doing? What is the position both since we
5 became independent and before?

6 "3) What is the worst case in relation to costs
7 which could result from this", et cetera.

8 Now, you've been asking, as a Board, I think,
9 questions of insurance coverage for both the
10 organisation and individual members of the Board since
11 mid-2013.

12 **A.** Yeah.

13 **Q.** It seems like you hadn't got an answer, at least
14 a definitive answer, by this time; is that right?

15 **A.** Yes.

16 **Q.** If we go, please, to the reply, which is at the foot of
17 page 1, from Alwen Lyons. She says:

18 "Alice

19 "Apart from making sure the business are ready to
20 answer these questions is there anything else you would
21 like me to do.

22 "The insurance issue is with Chris [Day] and I did
23 push for clarity to be included in the B48 email without
24 success."

25 I don't know what that means. Let's go up to see

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1 as a very significant IT partner, I'm not sure why that
2 would have -- I mean, maybe I'm being really stupid here
3 but I can't really see why that would affect executives'
4 ability or willingness to share that information with
5 the Board one way or -- in fact, it might be an argument
6 for, you know, "We're not sure we can trust -- this
7 another reason why we're not sure we can trust them".

8 So I think you could argue it either way.

9 **Q.** Thank you. That can come down.

10 Can I examine a little further the continued fallout
11 from the Second Sight Report --

12 **A.** Yes.

13 **Q.** -- and, in particular, looking at the Board's approach
14 as to whether the Second Sight Report opened it up to
15 legal challenge, by looking at POL00344895. Can we
16 start, please, at page 2, and scroll down. An email
17 from you -- we're now March 2014 --

18 **A.** Mm-hm.

19 **Q.** -- to Paula Vennells and Alwen Lyons, about Sparrow:

20 "Following our helpful conversation, I am setting
21 out what I would like on this for further substantive
22 discussion at the March Board meeting.

23 "1) The definitive view on all aspects of insurance
24 ie organisational and personal. What policies do we
25 have; what in practice do we believe they will cover us

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1 what you reply. You said:

2 "What is B48?!"

3 **A.** I'm no wiser.

4 **Q.** Yes:

5 "Maybe you can help by explaining to everyone what
6 the context is here.

7 "The position is intrinsically worrying (to put it
8 politely). The [Non-Executive Directors] are really
9 concerned because of the potential costs to the
10 business, the distraction from implementing our strategy
11 (which is demanding enough), the reputational issues,
12 and their personal positions. A bad combination made
13 far worse if the business does not appear to be on top
14 of it. So the paper needs to demonstrate that the
15 Board's concerns on the latter point [presumably that is
16 their personal positions] -- if that is possible. That
17 means it needs to be comprehensive, clear and
18 professional."

19 Then there's an issue about a non-attendance at
20 James Arbuthnot's meeting.

21 **A.** Mm.

22 **Q.** So I think this chain shows us that, by March 2014, you
23 and the Board were still not clear, seemingly, on what
24 the insurance situation was both for the company and for
25 Board members?

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1 A. Yes.

2 Q. Were there concerns, essentially, on behalf of Royal
3 Mail that you're expressing --

4 A. To be --

5 Q. -- as well as Post Office?

6 A. I can't say that -- I can't remember that there were, if
7 I'm honest.

8 Q. Can you help us: the Second Sight Report had, from the
9 Post Office's perspective, been presented as a positive
10 one?

11 A. Yes.

12 Q. No system-wide, ie systemic, issues had been found,
13 albeit there were some process problems --

14 A. Yes.

15 Q. -- concerning, in particular, training and support. Why
16 was there a continuing concern about the individual
17 liability of Board members if there were no problems
18 with the Horizon system?

19 A. I don't remember very much about this discussion about
20 the insurance side of things. I think that it was put
21 on the agenda by other non-executives. I can't remember
22 exactly but I think that Alasdair Marnoch certainly was
23 interested in this subject, at least in part because he
24 was the Chair of the Audit and Risk Committee and that's
25 the natural place for that to be -- you know, the first

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1 Q. -- in the interim, had the Board asked any more
2 questions about why there may be claims against them,
3 given the positive -- generally positive -- outcome of
4 the Second Sight Interim Review?

5 A. Well, during the intervening period, you've got the
6 beginning of the Mediation Scheme and you've got -- I'm
7 sure we'll come on to this -- something that was called
8 the expectation gap between what it began to emerge
9 subpostmasters and the people representing them thought
10 might be on the table in relation to the Mediation
11 Scheme and what the Post Office thought the outcome of
12 the Mediation Scheme in individual cases might be. And
13 I think that this concern was part of the story.

14 So you don't have a situation where the Interim
15 Report has come out and we've had the view of that, and
16 then nothing happens. You've got a continuing story, if
17 you like, because of the setting up of the Mediation
18 Scheme and what's beginning to emerge as people make
19 applications to go into that and it becomes clear --
20 clearer what it is they're hoping to get from it.

21 Q. Do I understand you to mean that you didn't think that
22 there were claims or were not advised that there were
23 claims that had merit, but you were more concerned about
24 claims that lacked merit being brought against the
25 company or the Board?

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1 port of call, I think, for that issue.

2 And I think, from what I remember, that the thing
3 that was beginning to get in the way for the
4 Non-Executive Directors was actually the delay in
5 answering the questions, rather than the questions
6 themselves, if you see what I mean.

7 Q. Not really. Why would you have a continuing concern
8 over the individual liability of Board members, ie their
9 personal positions and the need to nail down insurance
10 as protection, if there wasn't a belief that individual
11 members of the Board may be open to liability?

12 A. I think there was a question in people's minds, some
13 people's minds, about whether members of the Board might
14 be vulnerable in some way and that question, having been
15 put on the agenda, it was obviously in everybody's minds
16 and I do remember over a very long period it just
17 wasn't -- didn't seem to be possible to get definitive
18 advice about this and it became frustration in itself
19 that we couldn't get clear answers.

20 Q. Given the continuing concerns -- you first raised
21 personal liability of Board members for civil claims for
22 wrongful prosecution in July 2013 --

23 A. Yes.

24 Q. -- and we're now in March 2014 --

25 A. Yes.

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1 A. Both, I would say. I think we would always have been
2 concerned that there might be claims that had merit and
3 that we would need to deal with those, but we also, as
4 I've said, believed that the Horizon system was sound
5 and we thought that the legal side -- the work that
6 ought to be being done, in relation to past
7 prosecutions -- was being done and was being done
8 properly.

9 Q. I'm just trying to understand how it is that there is
10 this focus on liability of the company and the Board,
11 which seems to be a continuing concern even into March
12 '14, in the light of the positive Second Sight Report,
13 when we know that lurking underneath are a series of
14 advices that would expose the company to liability, that
15 may expose Board members to personal liability but
16 they're not revealed to you. It's as if two
17 conversations are going on at the same time --

18 A. Yes.

19 Q. -- in parallel; do you understand?

20 A. I understand. That's very clear, thank you. I do
21 understand.

22 Q. What you're saying in these email exchanges is not
23 motivated by, or a reflection of, you knowing about the
24 other thing that hadn't been revealed; is that right?

25 A. Absolutely right, yes.

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1 Q. So I'm trying to understand what it was that was
2 motivating you to continue to explore the extent of the
3 Board's own liability and the insurance position?

4 A. Yes.

5 Q. If it wasn't knowledge of the Jenkins problem, what was
6 it?

7 A. Well, I'm sorry to repeat myself but, if the Board asked
8 a question or people or somebody on the Board asked
9 a question, then it was important to me that the
10 business answered that question and I -- and I think
11 I wasn't alone in this -- I found it very strange that
12 it was taking this amount of time to get the answers to
13 what seemed like relatively straightforward questions.

14 And I think that, by this time, we were starting to
15 have some reservations about the way in which Chris Day
16 was performing his responsibilities and this was a part
17 of -- we just -- we didn't feel, at any rate, that he
18 was on top of this aspect of the job and we didn't seem
19 to be able to get anybody else to give us the answers,
20 and that was frustrating.

21 And I think we were, you know -- somewhere in
22 people's minds was always the thought that, you know, we
23 knew that people were interested in bringing claims
24 against us and you never know, when that happens, what
25 the outcome might be. So I think, you know, it was

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1 But, you know, given what we were being told, we
2 accepted it and we had -- I think, if you, you know, if
3 we try to put ourselves back into the shoes who were
4 reading that advice at that time, that wasn't
5 unreasonable.

6 Q. Thank you. Can I move to a new topic. You suggested in
7 your oral evidence yesterday, and suggest in a number of
8 parts in your witness statement, that, in your view,
9 Susan Crichton was substantially to blame for the
10 failure to provide the Board with relevant information
11 and documents?

12 A. Yes.

13 Q. Can we turn to POL00108058. This is an email exchange
14 of August 2013 between you and Paula Vennells.

15 A. Mm.

16 Q. In the email that we can see at the foot of this page
17 here you say:

18 "Yes. It is the fact that she ..."

19 You're talking about Susan Crichton here.

20 A. Mm.

21 Q. "... sees so much as beyond her control which made me
22 most worried. It is her alibi. That is why I pushed
23 back and also why I asked her to flag up if there was
24 anything she needed which she couldn't get."

25 Then you go on to talk about another issue. What

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1 a precaution -- on the part of the non-executive members
2 of the Board, it was a precautionary approach.

3 Q. If we go back to the document we were just displaying,
4 POL00344895, and look at page 2., and scroll down, your
5 second question:

6 "Are we safe from legal challenge in what we
7 are/have been doing? What is the position both since we
8 became independent and before?"

9 Why wasn't the Board -- why weren't you -- asking to
10 see the external lawyers' advice?

11 A. Because -- well, I think it depends which bit of
12 external lawyers' advice we're talking about here.

13 Q. Any.

14 A. So we knew that Brian Altman has -- had been asked to
15 give advice and we were given, at various points,
16 some -- well, I won't call them "summaries" because they
17 weren't -- as I now know, they weren't really summaries.
18 We were given a view of what was in that advice and I'm
19 sorry to say that I believed, and I think the other
20 Non-Executive Directors believed, what we were reading
21 in those papers about what was being said and we could
22 have asked to see that advice, you know, the original
23 documents and, if we had, the story might have been
24 very -- well, I think the story would have been very,
25 very different.

14

1 did you mean by "It is her alibi"?

2 A. So I was talking there about the subject which we
3 discussed yesterday, which was the fact that we'd got to
4 a position where the Interim Report from Second Sight
5 came not completely out of the blue but came very, very
6 unexpectedly to the Board in the run-up to its
7 publication, and the Board's concern as to how that had
8 happened, linked with the other issues that the Board
9 was concerned about, the length of time the work was
10 taking, the costs, and so on. So that's what I was
11 talking about there.

12 Q. What do you mean by "alibi"?

13 A. That --

14 Q. An alibi is normally if you're accused of a crime --

15 A. Oh, I see what you're saying, yes, yes.

16 Q. -- or accused of wrongdoing --

17 A. Yes, yes, well --

18 Q. -- you have an excuse or a reason to put yourself
19 somewhere else --

20 A. Yes, yes.

21 Q. -- and, therefore, say, "I can't have committed the
22 crime" --

23 A. Yes.

24 Q. -- or "I can't have undertaken the wrongful conduct".

25 A. Yes. So I think an "excuse" would have been a better

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1 word. "Alibi" does sound as though -- as you say, as
 2 those it's linked to a crime --
 3 **Q.** I'm not suggesting that you were here talking about
 4 Susan Crichton committing a crime at all. I am just
 5 seeking to understand what you meant by the use of the
 6 word "It is her alibi"?
 7 **A.** So what I think I'm saying here is that I didn't, and
 8 the Board didn't, think that Susan had done that aspect
 9 of her job well, that when I had had my conversation
 10 with her, she had talked about -- she had given me
 11 a variety of reasons as to why it hadn't been possible
 12 for her to anticipate in the way that we would have
 13 liked what was going to -- you know, the events leading
 14 up to the publication of the Interim Report and
 15 I thought that she was very passive, and I think that's
 16 really what I was trying to say here.
 17 **Q.** Does this show contemporaneous knowledge by you of
 18 a failure by Susan Crichton to do what she should have
 19 done in her job?
 20 **A.** In that respect. Not in the respect of her having
 21 concealed documents from us because --
 22 **Q.** That's what I was going to ask you about.
 23 **A.** Sorry.
 24 **Q.** Did you have any suspicion that she was deliberately not
 25 flagging potential concerns to you or to the Board?

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1 a separate part of the Business Department, on the Post
 2 Office team; and the other names, some of them
 3 I recognise and some of them I don't. I think they were
 4 all officials in the Business Department.
 5 **Q.** I see. So we should read this as not a committee of
 6 Post Office but a committee either of the Department or
 7 of ShEx?
 8 **A.** Yes. I mean, I may be wrong. It's possible that there
 9 is somebody in this list who was in the Post Office but
 10 I don't think so.
 11 **Q.** Thank you. Can we go forwards, please, to page 3 and
 12 under "POL Management":
 13 "The [Shareholder Executive Post Office] Team
 14 outlined that certain key vacancies have been filled
 15 over the course of the past year and a more appropriate
 16 management structure has been implemented. Yet,
 17 vacancies have also arisen", et cetera.
 18 **A.** Yes.
 19 **Q.** Next paragraph:
 20 "The Review Team also discussed the suitability of
 21 the current management team (ie capability and capacity)
 22 and in particular whether Paula Vennells was the right
 23 person to hold the CEO position long term. Questions
 24 were raised and it was agreed that a confidential and
 25 internal review would be undertaken to assess her

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1 **A.** Absolutely not. I had no idea.
 2 **Q.** Thank you. You raise in your witness statement that one
 3 of your achievements, I think, in your time at the Post
 4 Office, was replacing a large number -- in fact, I think
 5 every member -- of the Executive Committee, except Paula
 6 Vennells.
 7 **A.** Well, actually, it was -- the two people on the --
 8 **Q.** Kevin Gilliland?
 9 **A.** I beg your pardon?
 10 **Q.** Kevin Gilliland as well?
 11 **A.** Kevin Gilliland and Nick Kennett, who was the Financial
 12 Services Director.
 13 **Q.** Can we look, please, at UKGI00042089. These are the
 14 minutes of a Post Office Investment Review Committee.
 15 Can you see the attendees there?
 16 **A.** Yes, I can.
 17 **Q.** Just looking at that, of what would this be a committee?
 18 **A.** I never had anything to do with this committee.
 19 I probably heard about it at the time. There were
 20 various committees inside the Business Department. This
 21 looks to me like a Shareholder Executive committee.
 22 Richard Callard was, at that time, the Non-Executive
 23 Director on the Board representing the shareholder;
 24 Roger Lowe was one of his colleagues, possibly his boss;
 25 Tim McInnes was, I think, on the Post Office -- in

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1 suitability."
 2 Did you know this was going on?
 3 **A.** I don't think so.
 4 **Q.** Can we look, please, at some slides in the Department's
 5 Audit and Risk Committee from February 2014, so that's
 6 the next month. UKGI00042677. I think this makes it
 7 much clearer that this is not the Post Office --
 8 **A.** Okay, yes. I think so too.
 9 **Q.** -- this is the Department and the Shareholder Executive.
 10 **A.** Mm.
 11 **Q.** This is the Risk and Assurance Committee, or at least
 12 a presentation to it, of February 2014. Can we go to
 13 the second page, please, left-hand column underneath
 14 number 1:
 15 "Advice from the recent Annual Review suggested that
 16 the [Post Office] team give careful consideration to the
 17 continued suitability of Paula Vennells as CEO.
 18 "There is a general consensus that Paula is no
 19 longer the right person to lead [the Post Office] but
 20 justification is anecdotal.
 21 "This short paper aims to examine the options
 22 available to [the Shareholder Executive]."
 23 Then, on the right-hand side, under "Why is Paula's
 24 position under review?", at the bottom, the Committee
 25 was told:

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1 "However, the 2010 plan, which admittedly was not
 2 hers failed to deliver the expected revenue growth, and
 3 the Network Transformation has required politically
 4 awkward revisions to remain deliverable.
 5 "Paula has not shone an understanding of political
 6 considerations (ie presentation of plan to ministers) or
 7 of the detail of the plan, and she has been unable to
 8 work with the personalities that provide robust
 9 challenge to her."
 10 Then there is a third point.
 11 Did you know that it was seemingly the view of
 12 a team presenting to the Department and the Shareholder
 13 Executive that Ms Vennells had been unable to work with
 14 people that provided robust challenges to her.
 15 A. I don't think I did, no. These papers, when I saw them,
 16 are complete news to me.
 17 Q. Was that your view: that Ms Vennells had been unable to
 18 work with people who provided robust challenges to her?
 19 A. No, I don't think that was my view. You know, there was
 20 certainly some tension between Susan Barton, whose name
 21 appeared on the previous document and Paula. I think
 22 their working styles were very different and Susan
 23 was -- I mean, she was a very, very able person and she
 24 did a very, very good job and she was robust, and
 25 I think that there was some tension between the two of

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1 A. Okay.
 2 Q. Given this isn't a committee of which you were a member.
 3 A. Thank you. *(Pause)*
 4 Yeah. Thank you.
 5 Q. Then, over the page, please, moving to the option of
 6 "Remove", on the left-hand side of the page:
 7 "There is a general feeling that Paula is not the
 8 optimal person to lead [the Post Office] to deliver its
 9 commercial strategy.
 10 "[She] has not been able to establish good working
 11 relationships with Jo Swinson ..."
 12 That was the Minister at the time.
 13 A. It was.
 14 Q. "She has been unable to retain key staff."
 15 Did you hold any of those three views?
 16 A. At this point in time --
 17 Q. March 2014 -- February 2014 --
 18 A. I -- sorry?
 19 Q. February 2014.
 20 A. Yes. In this period in 2014, I did start -- and
 21 I wasn't alone in this -- to have reservations about
 22 Paula's ability to lead the Post Office in the
 23 circumstances which it found itself in.
 24 Q. Is it right to say those concerns included a doubt as to
 25 her personal grip, specifically on Horizon issues?

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1 them. I'm not aware -- I'm just trying -- let me just
 2 think about this for a second as to whether I was aware
 3 of that sort of tension with other people in her team.
 4 Q. I'm really asking you whether it was your view that
 5 Ms Vennells preferred to have yes-men and yes-women --
 6 A. No, I don't think that's fair.
 7 Q. -- around her, surrounding herself with a coterie of
 8 trusted lieutenants: Mark Davies, Angela van den Bogerd,
 9 Lesley Sewell, for example?
 10 A. I don't think that would be a fair characterisation.
 11 Q. Did you have any concern that she had been unable to
 12 work with people that provided robust challenges to her?
 13 A. I didn't have that concern, no.
 14 Q. Can we go forwards, please, to page 5. A series of
 15 options are outlined, one of which is, essentially,
 16 release her from her role now; the next of which is
 17 retain but review after a period of time.
 18 A. Mm.
 19 Q. Then we'll go on to see that another one is a retain
 20 until the natural course of events that she wishes to
 21 move on.
 22 "Retain and review", you'll see, if you just briefly
 23 scan what's said on that page --
 24 A. The whole of this page?
 25 Q. Yes, I mean, this is just to give you some context.

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1 A. Yes, and it went beyond that. I mean, that was the
 2 example -- that's illustrated by the setting of that
 3 personal objective, which I'm sure is what you've got in
 4 mind, but the concern about the grip went wider than
 5 that.
 6 Q. So just to summarise -- I'm not going to go to the
 7 documents -- for the 2014/15 year, you set as one of her
 8 objectives for that year a specific personal objective
 9 in relation to the need to give priority to Horizon
 10 issues?
 11 A. I did.
 12 Q. You tell us in your witness statement that at this time
 13 you had doubts as to her personal grip on Horizon issues
 14 and the level of attention that she was giving them?
 15 A. Yes.
 16 Q. That's paragraph 180. What were your concerns about the
 17 level of attention that Ms Vennells was giving to
 18 Horizon issues?
 19 A. I think that I felt that she was relying too much on her
 20 colleagues.
 21 Q. Which colleagues?
 22 A. Executive colleagues, so this --
 23 Q. Any in particular?
 24 A. Um ... well, in this -- in the context of Horizon, this
 25 would have been IT and Legal, primarily, and that -- I'm

24

1 just trying to find a way of describing what I meant by
2 not having -- because you're asking me about whether
3 I felt she relied too much on other people; that was the
4 question?

5 **Q.** Yes.

6 **A.** Yes. I think that I felt that there was too much
7 passing on of other people's views and that, when she
8 talked, say, to the Board, gave an update to the Board,
9 that what he was relying on were words that other people
10 had written for her, rather than her own words, perhaps
11 that's the best way of putting it.

12 **Q.** Thank you. On the right-hand side, under "Performance
13 as CEO and delivery of strategy plan", there is
14 a repetition of the point:

15 "[The Post Office] failed to deliver its 2010
16 strategic plan, and refused to keep the Government
17 properly appraised of developments in the [Network
18 Transformation] programme, requiring difficult revisions
19 in 2013. [Paula Vennells] has shown a worrying lack of
20 knowledge about the detail of the new plan."

21 Then this:

22 "Paula's people management has caused concern as she
23 appears unable to work with personalities and approaches
24 that differ from hers ..."

25 Just stopping there, is that a concern that you

25

1 **Q.** -- and then Post Office personnel on the other?

2 **A.** Exactly, yes.

3 **Q.** I see. The sentence continues:

4 "... and [she] has failed to build relationships
5 with key Directors."

6 Was that a view that you held in February 2014?

7 **A.** Other than -- I'm sorry, I keep repeating myself.
8 I mean, I was aware of the issue with Susan Barton but
9 I don't remember there being a -- my being aware of this
10 in relation to other directors, no. So I don't quite
11 understand where that's coming from.

12 **Q.** Next bullet point:

13 "Paula's performance as CEO has been questioned by
14 [the Post Office] Chair, and by members of the Board."

15 Had you spoken to the Department or ShEx about
16 Paula's performance?

17 **A.** As I say, Richard was party to this. I would have --
18 I had conversations from time to time with various
19 people in the Department, including Mark Russell, who
20 was the Head of the Shareholder Executive, and I can't
21 remember -- you know, I haven't got notes of those
22 meetings but I'm sure this would have come -- this would
23 have been a topic of conversation on a pretty regular
24 basis because, after all, it was one of my -- you know,
25 the key aspects of my role.

27

1 shared?

2 **A.** I don't think that was -- that wasn't one of my
3 concerns, other than, as I say, there was this tension
4 between her and Susan Barton, I recognised that.

5 **Q.** Do you know where the department and ShEx would get
6 information, that enables them to reach a view like
7 this, from?

8 **A.** Yes, I think they would have got it from a number of
9 sources.

10 **Q.** Being?

11 **A.** So Richard Callard, as I've already said, was
12 a Non-Executive Director on the Board and, therefore,
13 would have seen Paula operating in the context of the
14 Board, would have heard conversations, would have been
15 party to conversations that I and the other
16 Non-Executive Directors were having because he one of
17 us, in that sense. There would have been feedback, I'm
18 sure, from the Minister and the Minister's office, and
19 there would have been interactions with officials at
20 different levels in the department. So I would think
21 those would be the three main sources.

22 **Q.** On that last one, where you say, "there would have been
23 interactions between officials" do you mean officials
24 within the Department and ShEx, on the one hand --

25 **A.** Yes.

26

1 **Q.** By "other members of the Board", to your knowledge which
2 other members of the Board had questioned her
3 performance?

4 **A.** I think everybody had, by this stage.

5 **Q.** Thank you. That can come down.

6 Did you ever advise Ms Vennells that, if you wanted
7 an answer to a question, you should tell the person that
8 you were asking the question of the answer that you
9 wanted to hear and then, essentially, get them to either
10 confirm what you said was right or persuade you that you
11 were wrong?

12 **A.** I have absolutely no recollection of saying that and
13 it's not -- I simply cannot imagine circumstances in
14 which I would have said that.

15 **Q.** Ms Vennells told us that when she was preparing for the
16 Select Committee, on 3 February 2015, she sent an email
17 which said "What's the true answer?", which was about
18 the facility for remote access:

19 "I hope it is we know that this is not possible and
20 we are able to explain why that is. I need to be able
21 to say no it's not possible and that we're sure of this
22 because of XXX."

23 She told us that the phrasing of the email, the
24 framing of it, "We need to say this is not possible",
25 was specifically because you had told her that, if you

28

1 want to get to the truth and a really clear answer from
 2 somebody, you should tell them what it is you want to
 3 say very clearly and ask for the information that backs
 4 that up. Is that true; did you tell her that?

5 **A.** No. I think I might have said to her, you know, if you
 6 want to know something is true, you need to be really
 7 clear about what the proposition is.

8 **Q.** That's a very different issue.

9 **A.** Yes.

10 **Q.** Thank you. Can we move forward to the Post Office's
 11 conduct during the Mediation Scheme and its attitude --

12 **A.** Sorry, could I just say one other thing on that last
 13 conversation?

14 **Q.** Yes.

15 **A.** I'm -- it's a surprise to me that these sorts of
 16 detailed conversations were going on and that nobody
 17 told me that they were going on at the time. And
 18 I think that is -- I just find that rather
 19 extraordinary, that, you know, I was aware of these
 20 reservations that I and my fellow Board members had, and
 21 I would know that Richard would be party to that, and
 22 I knew that the Minister had some reservations, but
 23 I had absolutely no idea that there was this machinery
 24 inside the department that was having these
 25 conversations, and I just find that quite surprising.

29

1 paragraph, Sir Anthony said that he had communicated the
 2 following to you and Ms Vennells --

3 **A.** Yes.

4 **Q.** -- "The Post Office's case didn't make sense. It didn't
 5 make sense that reputable subpostmasters, appointed by
 6 the Post Office after an examination of their
 7 characters, would be stealing these sums of money but it
 8 didn't make sense, in particular, because, in a matter
 9 of days of any 'alleged' theft, they had to balance the
 10 books. It just never made sense. I made that point
 11 over and over again."

12 Did Sir Anthony make that point to you, whether over
 13 and over again, or at all?

14 **A.** Not at all.

15 **Q.** Do you recall having conversations with Sir Anthony?

16 **A.** I recall I had a meeting with him shortly, very shortly
 17 after he'd been appointed, which was a sort of --
 18 I hadn't been part of the selection process, Alasdair
 19 Marnoch was the non-executive who was involved with that
 20 and, after he was appointed -- and I think just after
 21 he'd had the very first meeting of the Working Party --
 22 he and I met and, as far as I'm aware, that is the only
 23 time I ever actually met him.

24 **Q.** He didn't say, on that occasion, that the Post Office's
 25 case didn't make sense, in that, on Post Office's view

31

1 **Q.** Thank you. Can we then turn to Post Office's conduct
 2 during the Mediation Scheme proper and its attitude
 3 towards the subpostmasters in the Mediation Scheme. Can
 4 we start with some advice that Sir Anthony Hooper says
 5 that he gave I think in February 2014, by looking at
 6 POL00100335. These are the minutes of a meeting with
 7 Sir Anthony Hooper. You can see who is in attendance:
 8 you're not.

9 **A.** Yeah.

10 **Q.** If we go down to paragraph 4:

11 "TH [that's Sir Anthony Hooper] agreed that [Second
 12 Sight] were very resource challenged, and it would be
 13 difficult for them to meet the current timetable. That
 14 said [Sir Anthony's] view was that [Second Sight] were
 15 trying to be objective and that they had a difficult
 16 path to tread ... in order to do their job properly (in
 17 his view) they would need to express an opinion on the
 18 merits of each claim. In [Sir Anthony's] view, this was
 19 something that they found hard to do. Some concern was
 20 expressed by [Paula Vennells] and [Chris Aujard] that
 21 [Second Sight] had not in their correspondence come
 22 across as independent, and may be unduly influenced by
 23 the need to satisfy certain MPs."

24 **A.** Mm.

25 **Q.** In his evidence to the Inquiry in relation to this

30

1 of the contract, they had to balance the books and make
 2 good any shortfalls of any losses within days of the
 3 losses occurring?

4 **A.** He didn't say that to me. I would have remembered if
 5 he'd said that to me and when we met it was very, very
 6 early days, so it would have been surprising if he had
 7 come to any sort of clear view. I think we were talking
 8 about, you know, as it were, the future, rather than
 9 about what he had already found, because it was very
 10 early days.

11 **Q.** Then over the page, please, to paragraph 6:

12 "[Sir Anthony's] strong contention was that [the
 13 Post Office] should take no precipitous action until
 14 such time as [Second Sight] had produced, say, 5
 15 reports, and until we had seen their thematic report.
 16 He noted the adverse [public relations] consequences of
 17 terminating ... and offered to make himself available to
 18 the Board ...

19 "The quantum of the compensation payments was
 20 discussed. [Sir Anthony] noted that the applicant's
 21 CQRs often painted a very distressing picture, where
 22 there had been loss of livelihood, and other losses.
 23 His view was that, should the evidence show that [the
 24 Post Office] that not acted properly, then the amount of
 25 compensation payable could be quite material (... this

32

1 contradicts legal advice obtained by [Post Office] from
 2 [Bond Dickinson] which categorically states that the
 3 maximum loss [Post Office] could expect ... would be
 4 limited to 3 months 'pay' under the subpostmasters'
 5 contract). It was not entirely clear whether
 6 [Sir Anthony] had in mind criminal cases only when he
 7 had made these comments."
 8 Was this passed on to you: that Sir Anthony's view
 9 was that the amount, the quantum of potential
 10 compensation, could be material, ie substantial?
 11 A. No.
 12 Q. Was it ever explained to you that there was a difference
 13 of view between the advice Bond Dickinson had given and
 14 that being explained by Sir Anthony?
 15 A. No.
 16 Q. I think, in the next month, Post Office took advice from
 17 Linklaters.
 18 A. Yes.
 19 Q. Can we turn to a Board meeting on 26 March 2014,
 20 POL00021523. These are the Board minutes for 26 March
 21 2014. You will see that you're present. Can we go,
 22 please, to page 2 at the foot. Thank you. Under (k):
 23 "The Board agreed that they needed to commission
 24 a piece of work, to complement that undertaken by
 25 Linklaters, to give them and those concerned outside the
 33

1 to what amounts of money might be payable, and --
 2 Q. I'm thinking more of the phraseology, Ms Perkins.
 3 A. I am coming to that. So, got -- sought this legal
 4 advice on what the exposure was. The legal advice was
 5 delivered on the basis -- needed -- in order to deliver
 6 their legal advice, Linklaters said that they wanted to
 7 be confident about the safety of the Horizon system and
 8 they were not happy about the quality or the nature of
 9 the work that Second Sight had done. So they were --
 10 and we haven't looked at that -- I mean, there are --
 11 I think in these minutes there are quotations from the
 12 Linklaters partner.
 13 Q. We're going to go to the --
 14 A. Yes, I'm, sorry, I'm anticipating.
 15 Q. Yes.
 16 A. But we had heard at this Board meeting that the
 17 Linklaters partner was sceptical about the work that had
 18 been undertaken by Second Sight and thought that
 19 a different kind of -- a different piece of work needed
 20 to be done, and that was what we -- that's how we
 21 arrived at the decision to commission a further piece of
 22 work.
 23 Q. I'm asking about the phraseology.
 24 A. Right.
 25 Q. Why is it, when I read a Board minute about commission
 35

1 Business, comfort about the Horizon system. The
 2 Business was asked to revert with the terms of reference
 3 and timescale for the work which [would] cover:
 4 "The work undertaken by Angela van den Bogerd
 5 explaining how the system works;
 6 "A review of the data integrity aspects of the
 7 system;
 8 "A reference to all audits and tests carried out on
 9 the system;
 10 "A response to the most significant thematic issues
 11 raised by Second Sight.
 12 "These terms of reference should be tested with
 13 Linklaters to ensure this work would satisfy them as
 14 evidence that Horizon is reliable and then agreed by the
 15 Board Sparrow Subcommittee."
 16 Just go back to the previous page, at the foot --
 17 thank you -- why did the Board wish to obtain a piece of
 18 work to give it, or Linklaters or those concerned
 19 outside the business comfort?
 20 A. So, at this time, there were continuing questions about
 21 the Horizon system and we -- and the Board was unclear
 22 about what the level of exposure of the Post Office was
 23 to claims, and I referred earlier this morning to the
 24 different perceptions of people going into -- applying
 25 to go in to the Mediation Scheme and the Post Office as
 34

1 anything a piece of work about Horizon, it always says
 2 something along the lines of "it will give us comfort,
 3 it will establish that Horizon is reliable, it will
 4 reassure us as to our existing view". We looked at two
 5 of them yesterday.
 6 A. Mm-hm.
 7 Q. You remember? Why is it always framed in that way?
 8 A. I think because, by this stage, we had had the Second
 9 Sight Interim Report, which said that it had so far not
 10 found evidence of systemic issues with the Horizon
 11 system. That had been interpreted by the Post Office as
 12 an assurance of that, and had, actually, as I said
 13 yesterday, similarly been interpreted in that way by
 14 Lord Arbuthnot and others, and we had no reason to be --
 15 to have doubts that that was the case.
 16 But, here we were, being advised by this very well
 17 respected legal firm but the evidence that we had was
 18 not sufficient for them and, therefore, we should seek
 19 some further advice. But I don't think that, at this
 20 point -- we did not think that there was anything wrong
 21 with the Horizon system at this point. But, if you're
 22 asking me whether what we were doing was simply seeking
 23 to commission advice which would give us the answer we
 24 wanted, that was absolutely not my position, and I'm
 25 completely sure it wasn't the position of other Board
 36

1 members either.

2 **Q.** Can we display at the same time, please, POL00107317,
3 and page 3 of that document, please. Sorry, I should
4 have rested on page 1 for a bit, just so you can see
5 what it was.

6 It's the Linklaters advice of 20 March for this
7 board meeting, okay, and presented by Christa Band. If
8 we go forward to page 3, please, and go to
9 paragraph 2.3, if we can just highlight that, thank you.
10 In the first part of that, there's some information
11 about Jo Swinson.

12 **A.** Mm.

13 **Q.** Then, in the second part of the paragraph, Linklaters
14 say:
15 "We note that there is, so far as we understand it,
16 no objective report which describes and addresses the
17 use and reliability of Horizon. We do think that such
18 a report [will] be helpful, though there's a decision to
19 be made about how broad and/or thorough it needs to be."

20 That was what was needed, wasn't it: an objective
21 report describing the use and reliability of Horizon?

22 **A.** Yes.

23 **Q.** If you just look at the right-hand side, what that gets
24 translated into:
25 "... the work should cover:

37

1 **Q.** Did the Board commission a comprehensive review of the
2 use and reliability of Horizon?

3 **A.** The Board commissioned a review by Deloitte, which was
4 a desktop exercise of assurances and controls of the
5 Horizon system.

6 **Q.** So that does that mean: no, it did not?

7 We're going to come and look at the Deloitte report
8 with all of its limitations in a moment but what Ms Band
9 was saying was that there is no objective report
10 describing and addressing the use and reliability of
11 Horizon. Did that come as a surprise to you? Did you
12 think "Goodness me, here we are in March 2014. We
13 haven't got an objective report that addresses the
14 reliability of Horizon"?

15 **A.** I think it made me realise that we had gone -- probably
16 gone down the wrong road in the work that we had asked
17 Second Sight to do, the case-based review, yes.

18 **Q.** Did you think, "How have we ended up here and what about
19 the times that I've said that we have had Horizon
20 independently assured or the times I've been present in
21 meetings with Parliamentarians, for example, and said we
22 have had Horizon independently reviewed investigated or
23 assured? What about the Ernst & Young audits? Don't
24 they count? What about the internal review that was
25 reviewed by Deloitte; doesn't that count? Have I said

39

1 "The work undertaken by Angela van den Bogerd
2 explaining how the system works ..."

3 Do you know what's meant by that: the work should
4 cover the work undertaken by Angela van den Bogerd?

5 **A.** I can't help you with that, I'm afraid, now.

6 **Q.** Secondly:
7 "A review of the data integrity aspects of the
8 system;
9 "A reference to all audits and tests carried out
10 ..."

11 So was that intended to mean a reference back to
12 previous audits?

13 **A.** Yes, I think so, yeah.

14 **Q.** Then:
15 "A response to the most significant thematic issues
16 raised by Second Sight."
17 That's rather different from what was proposed,
18 wasn't it: an objective report addressing the use and
19 reliability of Horizon?

20 **A.** Well, "an objective report which describes and addresses
21 the use and reliability of Horizon" is a very broad
22 statement.

23 **Q.** That was what was needed, though, wasn't it?

24 **A.** I'm sorry, I don't think that I can be of much more help
25 on this, I'm afraid.

38

1 things in the past that don't really stack up?"

2 **A.** To be honest, I can't remember exactly what I was
3 thinking when I was considering this report, other than
4 the fact that the work that had been done so far by
5 Second Sight was not the answer, was not what was
6 required here, and that we needed to commission some
7 more work. I just can't go back and dig that out of my
8 mind.

9 **Q.** Okay. Was it quite sobering, though --

10 **A.** Yes.

11 **Q.** -- to realise that in March 2014 --

12 **A.** Yes.

13 **Q.** -- you were being told by somebody new --

14 **A.** Yes.

15 **Q.** -- to the process, Linklaters, who were brought in --

16 **A.** Yes.

17 **Q.** -- to say, in fact "Here we are in March 2014, we
18 haven't actually got a report that addresses the
19 reliability of Horizon"?

20 **A.** Yeah, I think we were surprised by that.

21 **Q.** Thank you. Those documents can come down.
22 Can we turn then to the Deloitte report.
23 Essentially, the Deloitte Project Zebra Report was
24 a consequence of the decision made at that March 2014
25 meeting.

40

1 A. It was.

2 Q. I'm not going to look at the report itself. I want to

3 look, please, at the Board briefing prepared by

4 Deloitte, as a result of their work because that was

5 sent to you directly. For reference, it's -- no need to

6 display -- POL00027933, and the document I'm about to

7 show you was emailed to you on 24 June 2014 by the

8 Company Secretary, Alwen Lyons.

9 Let's look at that document, then. POL00028069. So

10 this is the Board Briefing, as I say, emailed to you by

11 Alwen Lyons on the very day that it was created. Would

12 you have read this at the time?

13 A. So this document was disclosed to me after I'd finished

14 the -- I had submitted my written statement just before

15 Christmas and, when I first saw it, I had no

16 recollection of having seen it. But there clearly is

17 an email from Alwen, I think not just to me but to

18 fellow Board members, in which she says she attaches

19 this.

20 Q. Yes.

21 A. The email itself doesn't appear to have the attachment

22 attached to it but I have no reason to think that it

23 wasn't attached, but I simply don't remember this.

24 Q. So you don't remember whether you read it or not?

25 A. If it came to me, I would have read it.

41

1 timeline. Our findings below are written in the context

2 of the information available, which relates to the

3 current system.

4 "[3] An event occurred in 2010 which required the

5 use of the exceptional Balancing Transaction process in

6 Horizon to correct a subpostmaster's position from

7 a technical issue. Information has not been provided on

8 the circumstances that [led] to this system say and how

9 the issue was identified. It is assumed that verbal

10 assertions received from Fujitsu that this was the only

11 time that this process has been used hold true.

12 "[4] We have not had any direct contact with any

13 third parties other than the named contacts that you

14 have provided to us.

15 "[5] We have not validated or commented on the

16 quality of the documentation supplied to us."

17 Were you disappointed to have received a report

18 which was limited and caveated in such a heavy way?

19 A. Could I scroll -- could I go back to the setting for the

20 receipt of this report? So we had had a Board meeting,

21 I think it was in -- a few weeks earlier than this, at

22 which the partner from Deloitte, who was responsible for

23 this exercise, he'd come to that Board meeting --

24 Q. Yes.

25 A. -- and he had given the Board an extremely positive

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1 Q. Okay. Can we look, please, at page 3 and just look at

2 the top paragraph:

3 "The work we carried out to support our full report,

4 and thus this Board Briefing document, did not

5 constitute an audit or assurance engagement in

6 accordance with UK or international standards. In order

7 to deliver a formal assurance opinion, we would need to

8 have carried out testing to address the scope

9 limitations. Our conclusions and findings are therefore

10 limited to the design of Horizon. They are also subject

11 to the accuracy of the assumptions and limitations in

12 section 3."

13 If we just go down the page, "Limitations and

14 Assumptions":

15 "Our findings and conclusions are presented in the

16 context of the following limitations:

17 "[1] As a desktop exercise we have not validated

18 whether Horizon has been implemented or operated as

19 described in the documentation reviewed.

20 "[2] Our work was limited by significant gaps

21 existing in the information available, relating to both

22 the granularity of information and the existence of

23 Horizon features over the entire timeline of operation

24 of Horizon. The effect of which is there are gaps

25 within what we are able to comment upon over this

42

1 sense of what Deloitte had found thus far, and that's

2 recorded in the minutes. So I think it is really,

3 really important to understand that. He had been

4 present at the meeting. He had given a very clear and

5 positive account of what he and his colleagues had seen

6 so far, and there was a discussion about further work

7 that should be done.

8 This Board Briefing that came in some weeks later,

9 was therefore a follow-up to that and, if we scroll up

10 the page a bit -- do you mind going back up?

11 Q. The second paragraph from the top?

12 A. Yes. So --

13 Q. I was going to come to that.

14 A. I'm sorry.

15 Q. I just wanted to --

16 A. I'm sorry.

17 Q. -- deal with the limitations first.

18 A. Yes, but I was trying to explain -- I think it is

19 really, really important that people understand that, in

20 my mind, and the mind of my fellow Board members, we had

21 had that very clear and positive steer from Gareth

22 James.

23 Q. So were you surprised, therefore --

24 A. Yes.

25 Q. -- if we scroll back down, to read all of these

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1 limitations?
 2 **A.** So, I think I said a minute ago, I don't recall seeing
 3 this report and, therefore, I don't recall reading it.
 4 I do, however, remember that there was disappointment
 5 that Deloitte did not feel able to give us the kind of
 6 description of Horizon that we had expected would be
 7 forthcoming following Gareth James' appearance at the
 8 Board and that there were, as I understood it from Chris
 9 Aujard, a whole lot of reservations about the value of
 10 doing further work, the cost of it and the time it would
 11 take.

12 **MR BEER:** Thank you. I'll leave that there for the moment?
 13 Sir, that would be a good time for the morning
 14 break.

15 **SIR WYN WILLIAMS:** All right.

16 **MR BEER:** Can we say until 11.10. Thank you.

17 (11.00 am)

18 (A short break)

19 (11.11 am)

20 **MR BEER:** Thank you.

21 Ms Perkins, I was asking you about the Board
 22 Briefing prepared by Deloitte --

23 **A.** Yes.

24 **Q.** -- dated 4 June 2014. Just for the transcript, and for
 25 those looking later, the document that shows that it and

45

1 "The Chairman thanked Gareth James for his draft
 2 report and explained there were a number of people who
 3 were sceptical about Horizon. The Board were concerned
 4 to know the truth about the reliability of the system.

5 Deloitte's views would need to be expressed in search
 6 a way that they would persuade reasonable lay people.

7 "Lesley Sewell explained that the first piece of
 8 work Deloitte had been asked to undertake was to give
 9 assurance that the control framework, including the
 10 security and processes for changes in the system, were
 11 robust from an IT perspective.

12 "Gareth James reported that all the work to date
 13 showed that the system had strong areas of control and
 14 that its testing and implementation were in line with
 15 best practice. Work was still needed to assure the
 16 controls and access at the Finance Service Centre.

17 "Chris Aujard explained that several of the
 18 subpostmasters who were challenging Horizon had made
 19 allegations about 'phantom' transactions which were
 20 non-traceable. Assurance from Deloitte about the
 21 integrity of the system records logs would be very
 22 valuable.

23 "The Board asked what assurance could be given
 24 pre-2010 when the different Horizon system was in use.

25 It was agreed that [Gareth Jenkins] would produce and

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1 the attachment was sent to you -- or it was sent to you
 2 as an attachment, is POL00138401. No need for that to
 3 be displayed.

4 **A.** No, no.

5 **Q.** That is an email to you and others showing that the
 6 document was emailed to you. You were making the point
 7 that we've got to read the Board Briefing of 4 June in
 8 the light of the earlier meeting of the Board on
 9 30 April, at which the partner from Deloitte had made
 10 a presentation?

11 **A.** Yes.

12 **Q.** So can we look at the two documents alongside each
 13 other, then. Firstly, the minutes of that Board
 14 meeting, POL00021524 -- thank you -- and can we go to
 15 page 6 of those. Thank you.

16 Then can we display the Board Briefing, POL00028069,
 17 at page 3 of the Board Briefing and, in particular, the
 18 bottom part of the page, the "Limitations and
 19 Assumptions" -- thank you.

20 So dealing with the document on the right, these are
 21 the minutes of the Board meeting of 30 April, which you
 22 were mentioning:

23 "The Board welcomed Lesley Sewell, [CIO], and Gareth
 24 James, Partner, Deloitte, to the meeting. Chris Aujard
 25 also rejoined the meeting.

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1 cost a proposal for additional work to enable assurance
 2 for the wider system, pre-2010.

3 "Lesley Sewell, Gareth James and Chris Aujard left
 4 the meeting."

5 It was that that you were referring to?

6 **A.** It was, yes.

7 **Q.** The "strong areas of control" is a reference to the
 8 control framework and security and processes for changes
 9 in the system in this minute, isn't it?

10 **A.** I have to confess, at this point, that my recollection
 11 of these sorts of details from this long ago are not
 12 good. I mean, I can't add much to what we see.

13 **Q.** What was in the minutes?

14 **A.** I really can't, I'm afraid.

15 **Q.** Okay, I understand. It's clear, reading the minute as
 16 a whole, that the Board needed some further work to be
 17 done by Deloitte?

18 **A.** Yes.

19 **Q.** What we're reading on the left-hand side is the product
 20 of that further work in June?

21 **A.** Yes.

22 **Q.** What it says, in the five limitations and assumptions,
 23 would you agree, does not really mean that the questions
 24 asked by the Board were answered?

25 **A.** Yes. I would agree but would it be all right to scroll

48

1 up --

2 **Q.** Yes.

3 **A.** -- because there's one paragraph which we haven't looked

4 at.

5 **Q.** Second from the top. We're going to look at that, don't

6 worry. I'm just looking at the limitations first.

7 Looking at the limitations first.

8 **A.** Okay.

9 **Q.** Would you have focused on these limitations?

10 **A.** As I said to you before the break, I have a complete

11 blank about this. For a long time, when -- so if

12 I could just explain that, when I was putting my written

13 statement together, last year, in the run-up to

14 Christmas, it was a complete mystery to me what had

15 happened following the Board meeting whose minutes we're

16 looking at now. I simply couldn't remember what, if

17 anything, the Board had received from Deloitte after

18 that and I was, you know, kind of struggling to -- just

19 to work out what had happened, and then this Board

20 briefing and the covering email, which I think I'm right

21 in saying has commentary from Chris Aujard in it -- is

22 that right?

23 **Q.** Sorry, the Board Briefing?

24 **A.** Yes, the Board Briefing. It's not covered -- that's

25 just a simple email from Alwen?

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1 Horizon operates in practice?

2 **A.** I see that now. Whether I saw that -- I can't answer

3 the question of what I was thinking at the time, as

4 I don't remember having seen this at the time. But

5 I understand what you're saying.

6 **Q.** We can go to various parts of the report.

7 **A.** Yeah.

8 **Q.** You've referred to it as a desktop review in your

9 evidence earlier, which is accurate. By "desktop

10 review", do you mean essentially looking at documents?

11 **A.** Yes.

12 **Q.** Would that be a concern, that where Christa Band had

13 advised that the Post Office lacked an independent

14 objective report on the use and reliability of Horizon,

15 what you've ended up with is a heavily caveated desktop

16 review of pieces of paper?

17 **A.** Yeah, I see that now. I do see that.

18 **Q.** Wouldn't it have been obvious at the time that the ask

19 from the lawyer, or the suggestion from the lawyer, was

20 not met with a response that in any way accorded with

21 what was suggested?

22 **A.** I think it should have done, yes. But I think it would

23 be relevant to look at what the covering email said

24 because that's where I would have started and where

25 I am --

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1 **Q.** No, there is commentary as well.

2 **A.** There is commentary as well?

3 **Q.** Yes.

4 **A.** So that came with commentary. Anyway, it wasn't until

5 that was disclosed to me, that I saw that we had seen

6 this. That was the main reason why I amended my written

7 statement before I signed it.

8 **Q.** Can we go to page 5 in the document on the left, please.

9 The way that it worked was that Deloitte were asked to

10 address, by Post Office, five questions. They're

11 described as "Matters" here, but five matters. And

12 question 4, you can see it's been translated into

13 "Matter 4" there, the question was:

14 "What comfort can be taken that Horizon provides

15 visibility to subpostmasters of all centrally generated

16 transactions processed to their branch ledgers?"

17 The answer is:

18 "The Horizon Audit Store reports from a complete

19 and unchanged record of all sealed baskets'. From the

20 documentation we have reviewed, it appears that Horizon

21 is designed such that extracts from the Audit Store

22 represent a complete and unchanged record of basket

23 data."

24 Reading this, would you be aware that all Deloitte

25 have done is looked at documents; they've not seen how

50

1 **Q.** I'll go to that in a moment, then --

2 **A.** -- sure the Board members would have started.

3 **Q.** -- if we may.

4 "Matter 5: 'Horizon provides visibility to

5 subpostmasters of all centrally generated transactions

6 processed to their Branch ledgers'. From the

7 documentation we have reviewed, it appears that Horizon

8 is designed such that subpostmaster has visibility of

9 all centrally generated transactions to their branch

10 ledgers in that accounting period. Central transactions

11 require subpostmaster approval to be processed, except

12 for [Balancing Transactions]. This appears to be

13 an exceptional process performed only by Fujitsu, and

14 asserted by them to have only been used once (in 2010)

15 between 2008 and the time of their assertion in this

16 area (... May 2014). Usage pre-2008 is currently not

17 known."

18 If you had read this, what would you have made of

19 a paragraph like that? Is it beyond your technical

20 understanding? What would you have drawn from it?

21 **A.** Well, this -- as we discussed yesterday, I think, this

22 does not come naturally to me, this area of work. It's

23 not something that I had or have any background in, so

24 I think, you know, I struggle with it, if I'm completely

25 honest. But, you know, if I -- if you read it out to me

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1 and I look at it now, I can see that what they're saying
 2 is, "This is how it said it works", and then it's making
 3 some -- towards the end of this paragraph -- that there
 4 are some reservations I suppose, is how you'd put it.
 5 **Q.** So would things like this have occurred to you -- and
 6 then I'm going to ask about how it may have occurred to
 7 the Board -- on reading a paragraph like this, "Oh, we
 8 don't know anything, number 1, about pre-2008. That's
 9 maybe a concern. Number 2, Hmmm, we've only just really
 10 got what Fujitsu are saying here to go by. It's just
 11 an oral assurance that they've only done it once, this
 12 thing" --
 13 **A.** Mm.
 14 **Q.** -- "and, number 3, doesn't that mean that Fujitsu
 15 actually have access to the system without the
 16 subpostmaster approving what's being done to their
 17 data?" Would those kind of things leap out to you?
 18 **A.** I don't know that -- I wouldn't say that they would have
 19 leaped out at me but, if you read this, you know, as
 20 you're reading it to me now, I understand what you're
 21 saying.
 22 **Q.** Thinking about the Board more generally, was there
 23 anyone on the Board that might, as I've just done, read
 24 that paragraph --
 25 **A.** Yeah.

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1 first bits of text you come to and there was some
 2 comfort in that, which is I think what Chris Aujard said
 3 in his covering --
 4 **Q.** Which we're going to come to in a second.
 5 **A.** -- note. Yes.
 6 **Q.** It's still a desktop review?
 7 **A.** Yes.
 8 **Q.** How would a desktop review, ie looking at pieces of
 9 paper, actually discover whether the system, as
 10 designed, was delivering the objectives of processing
 11 data with integrity?
 12 **A.** It wouldn't.
 13 **Q.** Can we go to the Chris Aujard email, please,
 14 POL00029733. If we scroll down, please, it's, in fact,
 15 from Alwen Lyons passing on a message --
 16 **A.** Yes.
 17 **Q.** -- from Chris Aujard.
 18 **A.** Mm-hm.
 19 **Q.** I think the point that you made earlier about the email
 20 not showing that the Deloitte report was attached is
 21 based on your reading of this?
 22 **A.** Yes, it is.
 23 **Q.** Okay, and I've given an alternative reference --
 24 **A.** Okay.
 25 **Q.** -- that shows that it was attached --

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1 **Q.** -- admittedly with the knowledge of everything that has
 2 happened, and pick out those three things: no assurance
 3 pre-2008; we've only got Fujitsu's word that they've
 4 done this once; and, if they've done it once, it means
 5 they've got the facility to do things to the data
 6 without a subpostmaster approving it, that's a bit
 7 worrying?
 8 **A.** I certainly would have thought that there would have
 9 been members of the Board who would have seen that and
 10 would have been more naturally -- I don't know what the
 11 word is -- knowledgeable about looking at this sort of
 12 description, yes.
 13 **Q.** Okay, can we go back, then, to paragraph 2 on page 3.
 14 **A.** Thank you.
 15 **Q.** Page 3. Second paragraph from the top:
 16 "Based on the desktop review we have performed,
 17 except for the lack of monitoring controls and the
 18 matters explicitly drawn out in our full report, we have
 19 not become aware of anything to suggest that the system
 20 as designed would not deliver the objectives of
 21 processing of baskets of transactions and keeping copies
 22 of them in the Audit Store with integrity."
 23 So you wanted to draw attention to that, as
 24 a comforting paragraph?
 25 **A.** That it was one of the first paragraphs -- one of the

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1 **A.** Okay, thank you.
 2 **Q.** -- because, if we scroll up, we can see that Alwen had
 3 missed Rod Williams off the email chain --
 4 **A.** Oh, I see. Got it.
 5 **Q.** -- she resends it --
 6 **A.** Yeah.
 7 **Q.** -- and on this one the Board Briefing is attached.
 8 **A.** I see, yes, yes.
 9 **Q.** But, because this is a chain it doesn't show attachments
 10 of earlier emails.
 11 **A.** I understand. Thank you, that's helpful.
 12 **Q.** If we scroll down, please, Alwen says:
 13 "Please find below a message from Chris Aujard and
 14 Lesley Sewell [attaching the] Briefing ...
 15 "Dear All,
 16 "As detailed in the Board update sent last Saturday,
 17 please find attached Deloitte's final draft 'Board
 18 Briefing' ..."
 19 Then scroll over to the second page:
 20 "The briefing focuses on those features of the
 21 Horizon system which operate to provide subpostmasters
 22 with full ownership and visibility of their branch
 23 ledger which maintain a complete and accurate audit
 24 trail. The briefing thus helps address allegations made
 25 by the Mediation Scheme Applicants that their branch

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1 losses may have been generated by 'phantom' Horizon
2 transactions.

3 "[It] strives to be succinct and intelligible.

4 However, given the subject matter and scope of the
5 review, it remains somewhat technical ... it is based on
6 a desktop review of currently available information ...
7 It is therefore heavily caveated.

8 "In the Briefing, Deloitte expressly identify number
9 of limitations and assumptions ... The Briefing must be
10 read in this context. That said, its key findings are",
11 and then it sets them out.

12 So the covering email, which I think you said you
13 would have focused on --

14 A. Mm.

15 Q. -- did actually draw attention to the fact that this is
16 a desktop review --

17 A. Yes.

18 Q. -- and it is heavily caveated with limitations and
19 assumptions?

20 A. Yes.

21 Q. I think it's right that Deloitte refuse to consent to
22 the publication of their report --

23 A. Yes.

24 Q. -- and they refuse to consent to the use of their name
25 publicly to assert that the system was working with

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1 believed that they were leading to and that we would be
2 able to publish that, and that was what we had intended
3 we would do.

4 I did remember that the follow-up to that meant that
5 we couldn't go down that route, and I did remember that
6 Deloitte had come to a different view after this, in
7 work had been done from the view that they had -- that
8 had been expressed at that Board meeting and that that
9 was something which meant that we were not able to go --
10 to follow the plan that we had at the time, and that --
11 yes, I think that was disappointing. That was
12 disappointing to us.

13 Q. Did you get the impression that Deloitte were rather
14 wise to the possibility that their name might be
15 associated with a public assertion that the system was
16 working with integrity and, therefore, were
17 uncomfortable with that and refused to allow it to
18 occur?

19 A. They were clearly refusing to allow that to happen and
20 I think there was some discussion about why they -- why
21 they, you know, felt that -- that way and I think we got
22 the impression that they weren't really -- they weren't
23 really interested in doing the additional work.

24 Q. Can we move forward to what impact all of this had on
25 the Mediation Scheme and look at POL00106889. This is

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1 integrity --

2 A. Yes.

3 Q. -- and they refused to do so unless they had undertaken
4 specific testing of the system in operation?

5 A. Yes, but they, I think, went on to say words to the
6 effect that weren't sure that there was value in doing
7 the amount of further work that would be required in
8 order to satisfy that.

9 Q. Overall, how did you view the Deloitte report, ie taking
10 into account what you'd been told at the meeting on
11 30 April and in the light of receiving that email and
12 the Board Briefing?

13 A. Well, as I said, I don't remember what I felt about the
14 Board Briefing because I didn't remember seeing it but,
15 clearly, the picture that we had been given at the Board
16 meeting by Gareth James was not borne out by what
17 followed.

18 Q. Was that clocked by the Board at the time? Was it
19 realised by the Board at the time?

20 A. So I think clearly what the Board realised -- I'll try
21 again. At the Board meeting which Gareth James
22 attended, I think the Board had the impression that
23 Deloitte were going to be able to write a report giving,
24 if you like, Horizon a clean bill of health. That's
25 what we believed that they were -- that's what we

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1 a draft of a presentation, I think, to be given to you.

2 A. Mm-hm.

3 Q. Is that right?

4 A. Looks like it.

5 Q. It's a presentation --

6 A. It does look like it.

7 Q. -- to you rather than by you?

8 A. Oh, it's not a presentation by me.

9 Q. If we go, please, to the introduction on page 7, the
10 author wrote:

11 "What does success look like?

12 "We bring a close the discussion on the Horizon IT
13 System as there is no evidence that there are systemic
14 issues with it (Independent assurance provided)."

15 Then skipping over a couple of paragraphs to the
16 fourth:

17 "In the run up to the election the Horizon issue
18 does not cause the Minister any problems."

19 Then skipping over one:

20 "Limited internal resource (from Chairman to
21 administration)/money spent on Horizon and more on
22 profit-making activity."

23 Was this a presentation, in fact, given to you?

24 A. I don't remember but probably. I mean, I don't know.

25 Q. This, on its face, is dated as being in draft on

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1 2 February 2014, so a couple of days before receipt of
 2 the Board Briefing?
 3 A. Yes.
 4 Q. Would it be fair to say that, in the light of that Board
 5 Briefing, it would not be possible to say, "There is no
 6 evidence that there are systemic issues with Horizon and
 7 independent assurance has been provided"?
 8 A. That would have had to have rested on the Second Sight
 9 Interim Report.
 10 Q. Not the Deloitte report?
 11 A. Not given what we have just seen dated 4 June, no.
 12 Q. No. The fourth bullet point:
 13 "In the run up to the election the Horizon issue
 14 does not cause the Minister any problems."
 15 Was the handling of the Horizon issue seen by the
 16 Board through the lens of whether it caused or did not
 17 cause the Government problems?
 18 A. Not -- no, not -- the answer to the question is no.
 19 I think, in the sense that the Board would never have
 20 done anything one way or another about Horizon because
 21 of the political fallout, or otherwise. But I think
 22 certainly I, because I was very -- because of my
 23 Government background, would have been sensitive to
 24 election -- you know, an election period, such as the
 25 one we're now in.

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1 A. Yes.
 2 Q. -- rather than a full Board.
 3 A. Okay, yeah.
 4 Q. You're present?
 5 A. Yes.
 6 Q. Yes?
 7 A. Yes.
 8 Q. If we just go to page 5, please, and look at
 9 paragraph 3.8. These are amongst the options. If we
 10 just scroll up to get the heading -- thank you -- these
 11 are options being considered at this time, "Completing
 12 the Post Office investigation in each case and moving
 13 the governance and management of the scheme in-house".
 14 A. Yeah.
 15 Q. "Under this option we would publish a report on Horizon
 16 and the Mediation Scheme setting out the legal position
 17 around the contract and liability. The scheme
 18 administration and management would be moved under Post
 19 Office's sole control with the Working Group disbanded
 20 and Second Sight's engagement ended."
 21 Is that essentially what happened in due course?
 22 A. So, in due course, not -- no, that's not quite right.
 23 So, in due course, what happened was the Working Group
 24 was disbanded. It was decided to give all applicants
 25 access to the Mediation Scheme and any applicants who

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1 Q. I mean, ironically at this time, June 2014 --
 2 A. There wasn't an election, no.
 3 Q. There wasn't one; it happened in May 2015.
 4 A. Indeed, you're right but, presumably, there was some
 5 speculation as to when that election might be.
 6 I just --
 7 Q. I'm just interested in the extent to which causing
 8 problems for the Minister was a material consideration
 9 at the handling of Horizon issues?
 10 A. Well, it certainly wouldn't have been a material
 11 consideration in terms of the -- of the substance of
 12 doing the right thing, as far as the Board was
 13 concerned.
 14 Q. Thank you. Is it right that the Post Office essentially
 15 took control of the Mediation Scheme in June 2014?
 16 A. I can't remember the exact date but --
 17 Q. Let's look at the documents --
 18 A. -- but I thought that the Working Group was closed down
 19 later than that.
 20 Q. I want to look at the genesis of that.
 21 A. Okay.
 22 Q. Can we start, please, by looking at POL00022128. This
 23 is a Board pack for the Board meeting of 6 June 2014.
 24 A. Of the subcommittee meeting?
 25 Q. Yes, I'm so sorry, yes, the Sparrow Sub-Committee --

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1 wanted would -- the Post Office would fund advice to
 2 them from Second Sight. That's what happened.
 3 Q. The reasons for this are given in paragraph 3.9, for the
 4 taking of that option, as being:
 5 "[It] would substantially reduce administration
 6 costs and allow the Post Office to 'take control' of the
 7 scheme and its associated risks (such as adverse [public
 8 relations]). We estimate the whole life cost ... at
 9 £7.7 million. The option would also release management
 10 time as the scheme would conclude more quickly than the
 11 other options ...
 12 "This could be justified publicly by setting out the
 13 case that we are taking action in the absence of any
 14 evidence of systemic failures with the Horizon system
 15 during the last two years, mounting costs ... and clear
 16 legal advice around the expectation gap."
 17 I should say we should go to page 8 and
 18 paragraph 7.3 -- thank you:
 19 "It is the view of the Programme, Legal and
 20 Communications and Corporate Affairs teams that the
 21 third option -- where the scheme is effectively moved
 22 in-house -- is the one which is in the best interest of
 23 the business in a pure 'commercial' sense. There is
 24 a weight of evidence to support this view, including
 25 value for money, timescales, concerns around the cost

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1 and quality of [Second Sight], the diversion of senior
2 management time and the critically important point that
3 in two years of investigation nothing has been uncovered
4 to raise doubts about the issue at the heart of this
5 [system] -- the operation of the Horizon computer
6 system."

7 Is it right that the subcommittee decided that this
8 option, Post Office taking control of the Mediation
9 Scheme, was the right one?

10 **A.** At this meeting, it appears that that was the decision
11 but it wasn't accepted by the Board.

12 **Q.** Do you know what the adverse public relations risks were
13 that the Post Office was facing in relation to the
14 Mediation Scheme?

15 **A.** I think what was meant by this was that there was
16 an increasing -- sorry, can you just give me a minute
17 while I find the words?

18 **Q.** Yes.

19 **A.** At this stage, with the Mediation Scheme, there was
20 a lot of noise around it, a lot of dissatisfaction with
21 it being expressed publicly, and I think the point here
22 was that it could be seen that the Mediation Scheme, on
23 the current -- the then current rate of progress, was
24 going to take very, very, very much longer to conclude
25 than had ever been envisaged and that, as long as that

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1 Just in context, that means whether the Post Office
2 should offer interviews before the appointment of Second
3 Sight was announced.

4 **A.** Oh, I see. Okay. Thank you.

5 **Q.** "... as that puts us on the defensive and it also gives
6 it more airspace.

7 "Do you agree -- you must say if not [please]!"

8 "Hope all is well.

9 "Paula."

10 Then top of the page, next day:

11 "Paula, sorry to pick this one up late. But

12 I agree -- absolutely nothing to be gained in giving the
13 story legs. Best course of action is to hold the
14 (strong) lines and stick with them."

15 Then:

16 "All well -- last day at Rethink."

17 That is the organisation that Mr Davies was working
18 for?

19 **A.** Yes.

20 **Q.** "Really looking forward to 9 July!"

21 That's his start date.

22 **A.** Okay.

23 **Q.** Then if we go up, please. That day, Paula Vennells
24 sends you that exchange:

25 "Thought you'd like to see this from Mark --

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1 was going on, there would be more of the kind of comment
2 that was being experienced at that time and that that
3 was -- that this was seen as unhelpful. I think that's
4 what that's saying.

5 **Q.** Thank you. That can come down.

6 Can I turn to my last topic, then, with you, and
7 it's essentially the role of Mr Davies, Mark Davies.

8 **A.** Yes.

9 **Q.** Can we turn up, please, POL00295386. I'm going to look
10 at a series of emails that you weren't party to
11 initially and then we'll look at some when you were. If
12 we go to page 3, please, and if we scroll down to the
13 middle of the page. Thank you.

14 So this is 21 June 2012, okay --

15 **A.** Mm-hm.

16 **Q.** -- and that's a month before Mark Davies joined the
17 business?

18 **A.** Right.

19 **Q.** Okay?

20 **A.** Yes.

21 **Q.** Ms Vennells writes to him:

22 "Mark, Alana was going to call you but is in Downing
23 Street.

24 "My sense is we are doing the right thing in not
25 offering interviews ..."

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1 [supported] and excited at joining.

2 "The only coverage this [morning] is the Telegraph
3 which is balanced."

4 Then up, please. You reply:

5 "Thanks. It will great to have him on board. ([By
6 the way] was NL okay about it?)"

7 Is that a reference to Norman Lamb.

8 **A.** I cannot think who else it was a reference to but
9 I don't know.

10 **Q.** Norman Lamb, at that time, was the Post Office Minister?

11 **A.** He was.

12 **Q.** Records suggest that he was the Parliamentary
13 Undersecretary of State for Employment Relations and
14 Postal Affairs, in office between 3 February 2012 and
15 4 September 2012, so in office at this period. You
16 can't think of anyone else who "NL" may refer to?

17 **A.** No.

18 **Q.** Okay.

19 If that does, as is suggested, refer to the
20 Minister, why were you concerned that the Post Office
21 Minister might not be okay that the Post Office had
22 appointed Mark Davies?

23 **A.** Mark Davies had worked for my husband and --

24 **Q.** He was your husband's -- Jack Straw's -- former Special
25 Adviser, SpAd?

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1 **A.** He was, yes. One of the new posts which the Post Office
 2 needed to create and fill was a Communications Director,
 3 following its independence from the Royal Mail. Up
 4 until April 2012, when the Post Office was part of Royal
 5 Mail, that communications function was exercised through
 6 the Royal Mail Group, and so, although there was
 7 somebody in the Communications Directorate in the Royal
 8 Mail, who was the Post Office person in that team, there
 9 wasn't anybody at the level with the relevant experience
 10 to carry out the role for the newly created Post Office,
 11 particularly given the agenda that we were trying to
 12 implement.

13 I think that decision had been taken before I came
 14 on board. I can't remember but, anyway, that decision
 15 was taken and there was going to be a proper process
 16 involving headhunters and a proper selection process.

17 And I remember that it occurred to me that Mark, who
 18 I knew simply through the work that he had done for my
 19 husband, was not particularly happy. I'd heard that he
 20 was not particularly happy where he was working and
 21 I thought that he would be a strong candidate for the
 22 post. And I remember thinking at the time -- I wondered
 23 whether I should even raise that because of the
 24 potential conflict that that -- you know, it could
 25 look --

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1 We needn't read the rest of it because she
 2 essentially gets the wrong end of the stick. She thinks
 3 you're speaking about have you run past Norman Lamb the
 4 issue of whether we should proactively offer interviews
 5 before Second Sight, okay?

6 **A.** Oh, I see.

7 **Q.** She gets the wrong end of the stick.

8 **A.** Okay.

9 **Q.** Then if we go to page 1 at the bottom, you put her
 10 right.

11 **A.** Right.

12 **Q.** You say:

13 "My query re [Norman Lamb]" --

14 **A.** Yes.

15 **Q.** -- "was in relation to Mark's arrival."

16 **A.** Yes.

17 **Q.** Not the issue of substance?

18 **A.** Yes.

19 **Q.** Then if we scroll up, second paragraph is her reply.

20 **A.** Okay.

21 **Q.** "[Norman Lamb] was grateful that I mentioned it.

22 I explained the proper process that had been followed
 23 and the calibre of the candidates he had been competing
 24 with for the role. I had to leave a message but he
 25 texted back and said something like: 'I appreciate the

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1 **Q.** It looked too cosy?

2 **A.** It looked too cosy and I nearly didn't suggest it and
 3 then I thought that was completely ridiculous because he
 4 would so obviously be very good at the role and why on
 5 earth would you not put somebody forward who was
 6 eminently qualified, both in terms of his experience and
 7 also his public service values, to -- for that role,
 8 just because he'd worked for your husband?

9 So I did suggest to Paula -- or, actually, I can't
 10 remember if I suggested to Paula or I suggested to Mark
 11 but, anyway, one way or another, Mark's name was given
 12 to the headhunters and he was then included in the
 13 selection process and I had absolutely nothing whatever
 14 to do with that.

15 **Q.** Okay, and so you're checking here that the potential for
 16 this to be viewed as a sort of cosy stitch-up --

17 **A.** Exactly.

18 **Q.** -- hadn't occurred to, or was operating on, the mind of
 19 the Minister?

20 **A.** I would have wanted to be absolutely clear, above board,
 21 and I would have wanted it to be drawn explicitly to the
 22 Minister's attention for all those reasons.

23 **Q.** Okay, if we then scroll up, please, Ms Vennells replies.
 24 If you look at the third paragraph, she says:

25 "I haven't mentioned specifically this week to NL."

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1 information, thank you, that all sounds fine'. And we
 2 had a great time over supper -- [he] is good company."

3 Then at the top of the page:

4 "I'm [very] glad you did this [you reply]. Right
 5 thing to do and he responded in the right way.

6 I thought he would. I've no idea whether we will get
 7 any flak about Mark but if we do, we are in a perfect
 8 place to handle it."

9 **A.** Yeah.

10 **Q.** So the flak is the cosy stitch-up suggestion?

11 **A.** Yeah, absolutely.

12 **Q.** The "perfect place to handle it", you're saying that
 13 because it's been run past the Minister?

14 **A.** No, I think -- well, yes, it had been run past the
 15 Minister, that was certainly part of it, but also
 16 because, you know, we'd done the proper thing, you know,
 17 we'd been scrupulous about it.

18 **Q.** To what extent, following this, did you rely on Mark
 19 Davies' advice as to the substance of decisions to be
 20 taken, as opposed to the later presentation and
 21 disclosure of such decisions to the media, ie after the
 22 decision had been taken?

23 **A.** I would have relied on Mark solely for his experience
 24 and professionalism around the public relations angle of
 25 things.

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1 Q. So not to contribute to the substance of a decision
 2 taken, only to take advice from him on the presentation
 3 of the decision after it had been taken?
 4 A. I think when you're thinking about decisions in a very
 5 public environment, one of the factors you want to take
 6 into account, you want to be aware of, is, you know, how
 7 would this come across? But that's not a basis on --
 8 you take a decision to do the right thing and then you
 9 work out how you're going to communicate it, but it's
 10 helpful to know in advance whether the way you
 11 communicate it is going to be a big issue or not.
 12 Q. To what extent, to your knowledge, did Paula Vennells
 13 include Mark Davies in the taking of decisions as
 14 opposed to the presentation and disclosure of such
 15 decisions after they had been made?
 16 A. I wouldn't have had visibility of that.
 17 Q. Do you know the extent to which Ms Vennells relied on
 18 Mark Davies to shape and set the direction for the Post
 19 Office's policy and strategy on issues?
 20 A. I don't know. You know, I can't really answer that.
 21 I mean, he was a trusted member of Paula's team and the
 22 Board was very impressed with him but, as to the extent
 23 to which she relied on him for the substance, rather
 24 than the presentation, I really don't know.
 25 Q. Here, he's being relied on before he's joined the

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1 included as well? Since we are trying to clear the
 2 matter up in ... a robust and transparent manner, it
 3 does seem to me that this needs further thought."
 4 Then if we go to the bottom of page 1, please,
 5 there's Ms Vennells reply:
 6 "Firstly, let me reassure you that Alice and
 7 I intend total transparency -- as I'm sure you sensed
 8 from the meeting we arranged for you and Oliver.
 9 "... the queries you raise are entirely valid ... we
 10 are dealing with particularly sensitive and personal
 11 situations ..."
 12 Third paragraph:
 13 "Rather than a blanket approach, we would take each
 14 case separately -- we are dealing with individuals'
 15 lives and livelihoods."
 16 Then further up, please. That email is sent on to,
 17 amongst others, Glenda Hansen, your Executive Assistant.
 18 A. Mm-hm.
 19 Q. Ms Vennells says:
 20 "... I will call Alice tomorrow pm or [not],
 21 hopefully after meeting James or at least having a time
 22 in the diary over the next two days. I shall also have
 23 had a chat with Mark Davies by then, which I know we'll
 24 reassure her too."

25 So, again, before Mr Davies has even taken up his

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1 company.
 2 A. But for a PR --
 3 Q. For a PR issue.
 4 A. Yes, for a PR issue, yes, he clearly is. But I didn't
 5 know that at the time, I think.
 6 Q. Well, I think you did, because you were on this email
 7 exchange?
 8 A. Oh, okay, well I didn't remember that.
 9 Q. Can we turn, please, to POL00295300, page 2 at the
 10 bottom, please. We're in June 2012 here.
 11 A. Mm-hm.
 12 Q. There's an email from Lord Arbuthnot to you and to
 13 Ms Vennells about the Second Sight terms of reference.
 14 A. Right.
 15 Q. "Thank you for sending me your proposed terms of
 16 reference -- they are most helpful.
 17 "A couple of issues have struck me and I wonder if
 18 you might give me your thoughts ... The first is that
 19 you are proposing that meetings should be held with MPs
 20 but not necessarily with the relevant subpostmasters
 21 there to put their side of the story. And MPs will not
 22 know as much as the subpostmasters will, and so the
 23 issue will not be resolved unless the MPs are also given
 24 the chance to have their constituents at the meeting.
 25 What about the advisers? Surely they ought to be

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1 post at the Post Office, Ms Vennells was expressing
 2 a view that you would be assured that she had had a chat
 3 with him before speaking to you, yes?
 4 A. Looks like that, yes.
 5 Q. So a CEO indicating that the Chairman of the company
 6 would be assured after she had had a call with the new
 7 Communications Lead, than if she had not done so. Was
 8 that because she knew that Mr Davies was somebody that
 9 you yourself particularly trusted?
 10 A. I don't know what it -- exactly what it was she was
 11 going to have a chat with him about. I mean, it clearly
 12 is about Lord Arbuthnot's message, but what aspect of it
 13 is not clear from this. I think that, at the time --
 14 and I can't remember the detail of this but there was
 15 really almost no communications input into the Post
 16 Office top team at that point and I think we were
 17 feeling the lack of it. But I don't remember this
 18 email.
 19 Q. Bearing in mind this was three weeks or so before
 20 Mr Davies joined the company, why would Paula Vennells
 21 chatting with him give you reassurance?
 22 A. I don't --
 23 Q. He'd never worked for you, had he?
 24 A. No, absolutely not. I just -- I knew that he had --
 25 I knew that my husband had rated him and I knew that he

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1 had a very good reputation, both within the Special
 2 Adviser community and that he was very much trusted in
 3 the media world.
 4 Q. When he joined the Post Office, did he perform the role
 5 of a Special Adviser --
 6 A. No.
 7 Q. -- rather than a Communications Lead?
 8 A. I don't think so. Look, I don't know exactly what kind
 9 of -- you know, all the conversations that Paula had
 10 with Mark but, certainly, as far as I was concerned,
 11 Mark was there to do the communications role and
 12 that's -- you know, when I sought his advice, that's
 13 what I was seeking his advice on.
 14 Q. Can we turn to POL00317714, bottom of page 1, and over
 15 to page 2. We're now in 2015.
 16 A. Yeah.
 17 Q. An email from Mr Davies to you directly:
 18 "Hi Alice
 19 "Hope all well and sorry to be bringing Sparrow to
 20 you.
 21 "I have drafted note below for colleagues and
 22 thought I would let you see the update now: it is still
 23 a live situation ..."
 24 "I will update the Board fully on [Thursday]."
 25 If we just scroll down, it is essentially a briefing

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1 What's that about?
 2 A. So I saw this correspondence very recently, I think last
 3 week, and I have to say that, with the benefit of
 4 hindsight, I don't think I should entered into this
 5 conversation. But Clare Sumner was somebody who had
 6 been a civil servant, I had known her particularly from
 7 my role in the Cabinet Office because of her position in
 8 the Civil Service, and she was by then working at the
 9 BBC.
 10 Q. So the "TH" --
 11 A. The "TH" is Tony Hall.
 12 Q. The then Chairman of the BBC?
 13 A. No, he was the Director General.
 14 Q. Director General. Thank you. So what you were doing
 15 was proposing to Mark Davies potentially contacting, by
 16 reason of a previous connection in government, the then
 17 Chief of Staff of the Director General about a programme
 18 to be broadcast by Panorama about the Post Office?
 19 A. That was -- I was reminding him of her existence and the
 20 role that she was in, yes.
 21 Q. Presumably to exert some influence?
 22 A. I thought -- I don't know what was going through my mind
 23 at the time.
 24 Q. Can you help us?
 25 A. Can I help you in what way?

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1 about how the Post Office is going to engage with the
 2 planned Panorama programme.
 3 A. Yeah.
 4 Q. Then if we go back to page 1, and scroll down to see
 5 your reply:
 6 "Thanks for updating me Mark. It sounds difficult
 7 but I am confident that nobody could be handling it
 8 better than you."
 9 Then you go on to describe the issues of substance.
 10 Was it usual for you, as the Chairman of the
 11 company, to have direct access to, or direct
 12 communications with, Mr Davies?
 13 A. I would have had direct access to communications with
 14 any of the Executive Directors.
 15 Q. Without going through Ms Vennells, who is not copied in
 16 to --
 17 A. No, she's not copied in. I mean, yes, I think I did
 18 sometimes have bilateral conversations or bilateral
 19 correspondence with them, but I would, you know, if
 20 there was anything new of substance, then I would have
 21 raised that with her in one of our weekly meetings or
 22 some other time.
 23 Q. You say:
 24 "Did you know Clare Sumner from the [Ministry of
 25 Justice]?"

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1 Q. With what was going through your mind? "Because of past
 2 connections with government, when you were part of
 3 government" --
 4 A. Yes.
 5 Q. -- "my husband's SpAd, did you come into contact with
 6 this other person in government, who now occupies
 7 a favourable position in the BBC? We're in dispute with
 8 the BBC, maybe you should get in to Clare Sumner"?
 9 A. I knew Clare Sumner in my own right, so that had nothing
 10 to do with a connection with my husband. Mark Davies
 11 was the person I knew through the connection with my
 12 hers. And, yes, I obviously was suggesting -- I thought
 13 Mark probably would have known her and I was suggesting
 14 he might consider getting in touch with her.
 15 Q. If we scroll up, please. He says:
 16 "I do know Clare. I might drop her a line.
 17 I always worry about going too nuclear too early but
 18 I think this is getting to that point I think."
 19 Did the Post Office go nuclear with Panorama?
 20 A. The Post Office was strong with Panorama. I wouldn't
 21 use the word "nuclear".
 22 Q. Can we go back a little, please, to December 2014.
 23 I think you're aware of Mr Davies appearing on the BBC
 24 Radio 4 Today Programme and referring to subpostmasters
 25 who'd been convicted of criminal offences, some of whom

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1 had been imprisoned, as experiencing "lifestyle issues"?
 2 A. Yes.
 3 Q. Were you aware of that at the time it was broadcast?
 4 A. I think I may have heard it. Yes.
 5 Q. Presumably because this was quite a mainstream media
 6 platform: Radio 4 Today Programme?
 7 A. Because Radio 4 Today Programme was on in our house
 8 every morning.
 9 Q. Was this comment that he made drawn to your attention
 10 afterwards?
 11 A. I think -- I can't remember. I think I -- I mean, I was
 12 aware of it and I remember thinking that it was ill
 13 judged.
 14 Q. Can you recall how it was handled, if at all, within the
 15 Post Office?
 16 A. No, I don't remember.
 17 Q. Was anything done about it?
 18 A. I don't remember.
 19 Q. Can we turn to POL00101860. Go down, please, to page 2.
 20 Thank you. 14 December, you're emailing Mr Davies, so
 21 this is after the Today Programme, and the second
 22 substantive paragraph:
 23 "On Sparrow, the [Financial Times] piece is
 24 obviously unhelpful. It made me think about whether it
 25 is in our best interests to maintain confidentiality.

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1 point -- with every broadcast they are putting a risk in
 2 the way of applicants having their cases heard.
 3 "I am calling my team this afternoon to discuss our
 4 next steps and will certainly have your points in mind.
 5 Part of the challenge here is that the BBC are playing
 6 games: and it may well be that if we can't provide
 7 a spokesperson they can't broadcast it as it would lack
 8 balance."
 9 So do you understand this to mean that refusing to
 10 provide a spokesperson would be a tactic used by the
 11 Post Office in the hope that the BBC would not broadcast
 12 because of a perceived lack of balance?
 13 A. That is what this is saying, yes.
 14 Q. Was what Mr Davies wrote here your view of what was
 15 happening: that the Post Office was duelling with the
 16 BBC?
 17 A. I don't remember exactly what this is about and it would
 18 have been -- you know, it would have been his view.
 19 I wasn't engaged in this. I'm just listening to what
 20 he's telling me and I am contributing -- I'm just
 21 contributing some comments.
 22 Q. Was the Post Office viewing itself as being embroiled in
 23 a battle against the campaigning subpostmasters?
 24 A. I think it was, yes. I think it was.
 25 Q. Were staff fighting to protect the reputation of the

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1 It probably is but if we haven't already, perhaps we
 2 should just ask ourselves that question? As long as we
 3 stick by our rules and they don't, we will not be able
 4 to respond to their allegations about the process. On
 5 the other hand, it's binary. So if we start to play by
 6 their rules we could find ourselves giving a running
 7 commentary about it."
 8 Can you remember the context of this, please?
 9 A. I don't know remember this Financial Times piece at all.
 10 Q. Can we scroll up to see what Mr Davies replies. He
 11 says, second paragraph, so it is back to you with
 12 Ms Vennells and Belinda Crowe copied in:
 13 "On Horizon, it is a final balance. The team and
 14 I have been working pretty much all weekend on the
 15 Parliamentary debate and (frankly) duelling with the BBC
 16 over their plans for a further round of broadcasts on
 17 Wednesday. A legal letter will go in the morning. Our
 18 approach will be to answer any specific points outside
 19 confidentiality -- they are very serious (such as
 20 alleged failure to follow due process) so we must. But
 21 I so think we need to maintain confidentiality for the
 22 scheme applicants."
 23 I think that might mean, "But I also think we need
 24 to maintain confidentiality for the scheme applicants":
 25 "I called the BBC editor on Friday to make this

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1 Post Office?
 2 A. People were fighting to protect the reputation of the
 3 Post Office, as we now know, based on a completely wrong
 4 understanding of the facts.
 5 Q. Is that how the scandal was then viewed internally by
 6 Post Office staff: a rather bloody PR battle in which
 7 they were entrenched against the campaigning
 8 subpostmasters?
 9 A. I wouldn't use those words. I think that what was going
 10 on here was that the Post Office was trying to -- we
 11 talked a bit about this yesterday -- was trying to
 12 protect its reputation as an organisation that could be
 13 trusted by the public and by its subpostmasters and its
 14 employees, under -- in a situation where allegations
 15 were being made that it couldn't be trusted.
 16 People within the Post Office, or at least, speaking
 17 for myself, I -- and I am very confident that my fellow
 18 non-executive Board members -- our understanding of the
 19 situation was that those allegations did not have
 20 substance and we were worried about the reputation of
 21 the Post Office suffering from allegations that were not
 22 substantiated.
 23 Q. If we scroll up, please, Belinda Crowe replies:
 24 "Happy to join a call ...
 25 "I didn't respond but we are on really dodgy ground

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1 if we get into the detail of cases. However, as you
2 know we have some good answers to some of the points
3 raised and provided we can position this in a way that
4 under no [circumstances] can it be construed as
5 commenting on a case we should be in quite a strong
6 position with our statement.

7 "Keep trying to think of Kipling."

8 I think you were familiar with Belinda Crowe; is
9 that right?

10 A. Yes, I knew -- I worked with Belinda at the Post Office,
11 yes.

12 Q. Were you responsible for her appointment?

13 A. I didn't know Belinda until she joined the Post Office.
14 Her name was, I think, suggested either to me or to
15 Paula as somebody who could be helpful, I think,
16 initially in relation to the work we'd were doing on
17 mutualisation, which was underresourced.

18 Q. She refers to getting on to "really dodgy ground" if the
19 Post Office got into the detail of cases. Do you know
20 why, at this time, the Post Office would be on "dodgy
21 ground" if it got into the detail of individual cases?

22 A. I think she's referring to the confidentiality point.

23 Q. Rather than the substance?

24 A. Yes. I think what must have been happening here is that
25 either the BBC or the Financial Times or somebody else

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1 least fails while daring greatly, so that his place
2 shall never be with those cold and timid souls who
3 neither know victory nor defeat."

4 I'm not sure Theodore Roosevelt quite had in mind
5 a government-owned entity battling its own staff over
6 whether it was complicit in the procurement of wrongful
7 convictions but does this give an insight into what
8 Mr Davies saw as his role at the Post Office?

9 A. I think that this is a -- I mean, did I see this email,
10 this email exchange at the time?

11 Q. No. I'm asking you about how Mr Davies was acting --

12 A. No, I understand, yes.

13 Q. -- what he saw his role as.

14 A. I think that he was just, you know, he must have been
15 feeling under a lot of pressure.

16 Q. Was it your view that the Post Office team regarded
17 themselves as marred by dust and sweat and blood in
18 a worthy battle against their subpostmasters?

19 A. I wouldn't have put it like that.

20 MR BEER: Thank you. They're the only questions I ask you.

21 Sir, can we take the second morning break until
22 12.30?

23 SIR WYN WILLIAMS: Then I understand the plan is to have one
24 set of questioning of Ms Perkins, which will last up to
25 40 minutes -- is that the idea -- so we have a late

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1 was -- and this does -- I've seen this happen in other
2 contexts -- they start to talk about personal
3 confidential issues about particular cases and the
4 organisation concerned is unable to answer those points
5 because it feels itself bound by confidentiality, which
6 the commentators are not being bound by. So it's a kind
7 of unequal conversation you're having.

8 Q. She ends, "I am trying to think of Kipling", which
9 presumably is "If you can keep your head whilst all
10 about you are losing theirs and blaming it on you".

11 A. I imagine that that is -- I've no idea.

12 Q. No. Then Mr Davies replies, and I'll try to do this
13 justice:

14 "It is not the critic who counts; not the man who
15 points out how the strong man stumbles, or where the
16 doer of deeds could have done them better.

17 "The credit belongs to the man who is actually in
18 the arena, whose face is marred by dust and sweat and
19 blood; who strives valiantly; who errs, who comes short
20 again and again, because there is no effort without
21 error and shortcoming; but who actually does actually
22 strive to do the deeds; who knows great enthusiasms,
23 with great devotions; who spends himself in a worthy
24 cause; who at best knows in the end of the triumph of
25 high achievement, and who at the worst, if he fails, at

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1 lunch? That's the plan?

2 MR BEER: That's right, yes. A ten-minute-late lunch.

3 SIR WYN WILLIAMS: Yes, fine. That's very good sleight of
4 hand, if I may say so, Mr Beer. Our lunchtime gets less
5 and less in time.

6 Right, so we will have our ten-minute break and then
7 whoever is first up will have 40 minutes.

8 MR BEER: Thank you very much, sir.

9 (12.19 pm)

(A short break)

10 (12.32 pm)

12 SIR WYN WILLIAMS: Who is first up?

13 Questioned by MR JACOBS

14 MR JACOBS: It's me, sir. I just need to check the
15 microphone is so you can hear me. How is that?

16 Thank you, Ms Perkins, I ask questions for
17 subpostmasters, very many who are represented by
18 Howe+Co, most of whom, if not all, are following
19 proceedings this afternoon.

20 My first question for you is: did you protect the
21 subpostmasters in your role as Chairman of the Board?

22 A. I did my best to protect subpostmasters.

23 Q. Did you succeed in protecting them, Ms Perkins?

24 A. No, obviously not.

25 Q. Did you consider that the Board was under a duty to

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1 protect subpostmasters?
 2 **A.** The Board -- the Board was under a duty to run the
 3 company properly and that clearly included looking after
 4 the interests of all the people who worked in the
 5 company.
 6 **Q.** So I think your answer is yes?
 7 **A.** Yes.
 8 **Q.** You referred this morning to Sir Anthony Hooper's
 9 evidence. You say that you dispute that these
 10 conversations happened, but that's another point for
 11 another day. Essentially, the point he was making was
 12 that it didn't make sense that people of good character
 13 would all turn to crime at approximately the same time
 14 and in circumstances where they were bound to be caught
 15 because they had to balance at the end of the balancing
 16 period. Wasn't that a point that was obvious to the
 17 Board or should have been obvious to the Board,
 18 regardless of whether Sir Anthony had raised it with
 19 you?
 20 **A.** It was a point clearly that was not obvious to the Board
 21 because, if it had been obvious to the Board, we would
 22 have taken different actions.
 23 **Q.** Okay. Why do you say it wasn't obvious? We have large
 24 numbers of people selected because they are of good
 25 character, suddenly there's a raft of prosecutions,

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1 [Martin Edwards] is briefed if you want more detail.
 2 This is just in case."
 3 Now, you said yesterday you took it at face value
 4 and you shouldn't have done. Did you accept, as
 5 Chairman of the Board that this was an enormous issue
 6 that potentially rendered convictions unsafe.
 7 **A.** I'm sorry what was your question?
 8 **Q.** Didn't you accept or couldn't you see from that email
 9 that this was an enormous issue that potentially
 10 rendered criminal convictions unsafe?
 11 **A.** I didn't see it from that email and if I had seen it
 12 from that email I would have done something about it.
 13 **Q.** Well, what you were being told at face value was
 14 essentially of the Simon Clarke Advice, that
 15 a representative from Fujitsu made statements about no
 16 bugs?
 17 **A.** I was told that it was not material and I was also told
 18 that I was being told just in case.
 19 **Q.** You said in your evidence today that, some time in 2014,
 20 you expressed concerns about the Chief Executive, Paula
 21 Vennells; is that right?
 22 **A.** Yes.
 23 **Q.** Did there come a time when you stopped taking her at
 24 face value and started taking the initiative yourself?
 25 **A.** I think I did take my initiative myself, right at the

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1 a raft of allegations, they all claim that the system is
 2 to blame, and it appears that large numbers of people,
 3 who are otherwise honest, were turning to crime, roughly
 4 at about the same time. That was what was being said in
 5 the press, Private Eye, Computer Weekly. Surely the
 6 Board must have been aware of this?
 7 **A.** So your question implies that this was happening out of
 8 the blue at the time that I and my fellow Board members
 9 were there. In fact, this had been happening over
 10 a very, very long period --
 11 **Q.** Yes.
 12 **A.** -- and we became aware of it only slowly. It wasn't as
 13 though there was suddenly a huge implosion of cases. So
 14 I think that as a misleading way of putting it.
 15 **Q.** Well, let's move on to another issue that no action was
 16 taken on. Yesterday, at around 4.10, you were taken to
 17 an email that Paula Vennells sent to you on 21 October
 18 2013. We don't need to put it up but she said:
 19 "My concern re Sparrow currently is our obligations
 20 of disclosure re an unsafe witness."
 21 Then, in brackets:
 22 "The representative from Fujitsu made statements
 23 about no bugs which later could be seen to have been
 24 undermined by the Second Sight Report. We don't think
 25 it material but it could be high profile. Martin E

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1 very, very beginning of this -- of my time at the Post
 2 Office, when I was the person who decided that the Post
 3 Office should undertake a new, independent review of the
 4 subpostmasters' cases.
 5 **Q.** This issue, the Gareth Jenkins issue, had legal
 6 implications; didn't you think that you should speak to
 7 your General Counsel about this?
 8 **A.** If I had thought I should speak to the General Counsel
 9 I would have done so.
 10 **Q.** During your tenure as Chairman, there were a lot of red
 11 flags which the Board should have acted on; do you
 12 accept that?
 13 **A.** During my tenure, there were a lot of what I would
 14 describe as clues, I absolutely accept that. But
 15 I think that one of the great difficulties that we are
 16 in at the moment is that we know the truth of what
 17 happened now and we can see it being laid out very
 18 plainly, and it's becoming clearer and clearer as this
 19 Inquiry goes on. But, at the time that I and my fellow
 20 Board members were in post, that was absolutely not the
 21 position.
 22 **Q.** Very well. Well, let's take the clues cumulatively:
 23 there were the clues that constitute Sir Anthony
 24 Hooper's point; there were the clues in relation to the
 25 Gareth Jenkins issue; matters raised by Private Eye,

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1 Computer Weekly, the JFSA and Second Sight; there were
 2 quite a lot of clues coming together, weren't there?
 3 **A.** I was not in receipt of the clue from Sir Anthony
 4 Hooper. I think you need to be -- I need to be clear
 5 about the clues that I was aware of and the clues that
 6 I was not aware of.
 7 **Q.** Well, let's talk about the matters that you were aware
 8 of. Do you accept that the matters that you were aware
 9 of were relevant to the reputation of the Post Office as
 10 a public institution?
 11 **A.** Clearly, yes.
 12 **Q.** Do you accept that the matters that you were aware of
 13 may have attracted public interest?
 14 **A.** Yes.
 15 **Q.** Do you accept that these matters might have had
 16 an impact on the value of the Post Office brand?
 17 **A.** Yes.
 18 **Q.** Do you accept that these were matters that were
 19 involving prosecution decisions which were material to
 20 the interests of the Post Office Group?
 21 **A.** But we believed that what we were doing was that we --
 22 we believed that what we were doing was right because --
 23 on the basis of what we believed to be the position.
 24 **Q.** Well, that's not the question that I asked. Do you
 25 accept that the matters that you knew were matters

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1 their duties and responsibilities under this bullet
 2 point, don't they?
 3 **A.** They do, yeah.
 4 **Q.** If we could scroll down further then, please, to page 3
 5 of 5, "Matters Reserved for Board Decision", D:
 6 "The following matters are reserved specifically for
 7 Board decision. When indicated [with a star], the Board
 8 may delegate authority to a Board subcommittee to bring
 9 forward a recommendation for approval or to complete
 10 a project or task on behalf of the Board."
 11 If we then go to section D, scrolling down please,
 12 sorry, keep scrolling down, please. I think it's
 13 section 5, governance -- 6, "Governance", here we are,
 14 and bullet point 5 -- the next one down, sorry:
 15 "Decisions on the potential prosecution, defence or
 16 settlement of litigation involving potential costs of
 17 more than £1 million or being otherwise material to the
 18 interests of the Group."
 19 So these were the matters that the Board knew
 20 engaged this part of the terms of reference, don't they?
 21 **A.** Sorry, what was your question?
 22 **Q.** The matters that you say the Board were aware of, the
 23 clues --
 24 **A.** Yes.
 25 **Q.** -- engages this aspect of the terms of reference of the

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1 involving prosecution decisions which were material to
 2 the interests of the Post Office Board?
 3 **A.** Oh, I see, yes.
 4 **Q.** Sorry, if I am going to a quickly --
 5 **A.** You are going extremely quickly and I have had a very
 6 long morning.
 7 **Q.** I will slow right down.
 8 **A.** Thank you, I will appreciate that.
 9 **Q.** Can I then ask you to look at a document, it is the
 10 Board terms of reference, it's WITN00220103. If we can
 11 scroll down. You'll see your name is there as Chairman
 12 of the Board, and the other Non-Executive Directors,
 13 Chief Executive, Chief Financial Officer. If we could
 14 go down to page 2 of 5, where it says, "Duties and
 15 Responsibilities", it says:
 16 "In addition to its legal duties, the Board has the
 17 following specific responsibilities ..."
 18 Then if we could scroll down to the next bullet
 19 point, which is on the next page:
 20 "Maintenance of the reputation of the Post Office as
 21 a public institution, including consideration of new
 22 products and activities which may attract public
 23 interest or have an impact on the value of the Post
 24 Office brand."
 25 So these issues that the Board was aware of engaged

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1 Board, doesn't it?
 2 **A.** Yes.
 3 **Q.** So it was the function of the Board to be proactive in
 4 relation to its terms of reference; is that right?
 5 **A.** Yes, yes.
 6 **Q.** It was not the function of the Board to sit back and
 7 accept everything that its executives were telling it;
 8 is that fair?
 9 **A.** Yes.
 10 **Q.** In sitting back and accepting, without challenging, what
 11 Paula Vennells and others were telling you, do you agree
 12 the Board did not act in accordance with its own terms
 13 of reference?
 14 **A.** I think that that's a big generalisation. So I would
 15 say that, first of all, in respect of the Board's wider
 16 responsibilities, which we're perfectly properly not
 17 discussing here, the Board absolutely fulfilled its
 18 responsibilities. I think it's clear from the ground
 19 that I've covered over the last day and a half that
 20 there are quite specific issues where I now think that
 21 the Board should have been -- have followed things up or
 22 should have challenged things in a way that it didn't at
 23 the time and I've been very straightforward about that.
 24 **Q.** You said at the beginning of my questions to you that
 25 you agree that the Board had duties towards the

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1 subpostmasters?

2 **A.** Yes.

3 **Q.** At paragraph 51 of your statement -- and I'll just read

4 it out -- you say:

5 "It would not have been appropriate for the Board to

6 be involved in the granular day-to-day operations of the

7 business any more than it would have been for the Board

8 of a large commercial company."

9 That's the wrong approach, isn't it?

10 **A.** Well, if it -- if I'd thought it was the wrong approach,

11 I wouldn't have put it in my witness statement.

12 **Q.** Well, we are suggesting that what you put in your

13 witness statement is wrong. That wasn't the right

14 approach for you to take.

15 **A.** It wasn't -- in my view -- all Boards have a really

16 difficult line to tread between exercising

17 a strategic -- giving the company, the organisation in

18 question, strategic input into their business activities

19 and standing back and being more objective about what's

20 going on. They also have duties to hold the executives

21 to account and to challenge them. You have, all the

22 time, to be thinking about where is the right place to

23 draw that line because, if, as a board, you get too far

24 into the operational detail, you can't fulfil your wider

25 responsibilities.

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1 compassionate and less corporate approach?

2 **A.** I am just in danger of repeating myself. I have already

3 said where I think we should have pursued things more

4 than we did. We acted in the belief that the advice

5 that we had received was correct and we didn't

6 understand what it was that we had not received.

7 **Q.** Well, wasn't it also the case that the Board saw the

8 subpostmasters and their claims as damaging to the brand

9 and that is why the Board didn't protect the

10 subpostmasters?

11 **A.** The reason that the Board didn't take a different line

12 in relation to the prosecutions was because we

13 mistakenly believed the position that was being

14 explained to us by the Post Office's executives.

15 **Q.** Which executive?

16 **SIR WYN WILLIAMS:** Mr Jacobs, yes, I'm sorry to interrupt.

17 Can I just take one or two minutes from you because

18 I have still got in front of me the terms of reference,

19 and would just like to ask Ms Perkins a question about

20 the bullet point that is highlighted there, which

21 I interpret to mean as follows: that in relation to

22 litigation which has a value of £1 million or more, if

23 you at up the damages or costs, or whatever --

24 **A.** Yes.

25 **SIR WYN WILLIAMS:** -- then the Board itself has to make

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1 So that's something that you're constantly juggling.

2 I think I have -- as I said a minute ago, I have already

3 explained where I think we should have been more

4 questioning or should have pursued things in more

5 detail. We did not get that right in every instance.

6 **Q.** You remember you said yesterday, "I was prepared to lift

7 the rock and see what was underneath it".

8 **A.** Yes.

9 **Q.** Our clients take the view that the Board was asleep at

10 the helm and no one lifted the rock: they accepted,

11 blandly, what Vennells and other people were telling

12 them?

13 **A.** If you look at what happened in my early months at the

14 Post Office, you will absolutely see that I lifted the

15 rock and I pretty much did it entirely on my own at that

16 point.

17 **Q.** In relation to what you say about a strategic approach

18 in respect of large commercial companies, wasn't it all

19 the more important for the Board to have been proactive

20 in the subpostmasters' cases because this was

21 a publicly-owned company that was bringing actions

22 against people that resulted in imprisonment, desperate

23 financial hardship, the breakup of families, health

24 breaking down and real damage to subpostmasters and

25 their families? Shouldn't you have taken a more

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1 a decision about what to do about it.

2 **A.** That --

3 **SIR WYN WILLIAMS:** But then we have this other rather

4 imprecise phrase:

5 "... or being otherwise material to the interests of

6 the Group."

7 **A.** Mm.

8 **SIR WYN WILLIAMS:** Now, forgive me, the interests of the

9 group, is that sort of taken from the time when it was

10 the Royal Mail Group and has just been drafted on, so to

11 speak, or was it a Post Office Group, after separation?

12 **A.** There were various iterations of these terms of

13 reference --

14 **SIR WYN WILLIAMS:** Right.

15 **A.** -- at different points and, looking at this now, I can

16 see that the word "Group" does look odd.

17 **SIR WYN WILLIAMS:** Anyway, that wasn't the main point. The

18 main point I wanted to ask you about is how the Board

19 interpreted the phrase "being otherwise material to the

20 interests", and let's say of the Post Office? It's

21 a very, as I say, imprecise phrase.

22 **A.** It is a very imprecise phrase.

23 **SIR WYN WILLIAMS:** So how did you go about deciding whether

24 or not this should be a Board decision or a decision

25 made by someone else, in effect?

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1 A. I think that we would have been mindful of the effects
2 of these sorts of issues on the shareholder. I think we
3 would have been mindful, as has been discussed at
4 length, of their affect on the Post Office's reputation
5 and, in addition to this point about costs of more than
6 1 million, we were also looking at cumulative costs.

7 **SIR WYN WILLIAMS:** Would I be right in thinking that the
8 Board itself would only be in a position to make
9 a decision as to who should make the decision if the
10 particular problem was brought before the Board? In
11 other words, you didn't have an internal mechanism
12 whereby, I don't know, every three or six months, you
13 checked upon whether there were decisions which the
14 Board, as opposed to Mr X or Ms Y, should be taking?

15 A. In relation to prosecutions? Yes --

16 **SIR WYN WILLIAMS:** Mm.

17 A. -- you are right about that.

18 **SIR WYN WILLIAMS:** Yes.

19 A. Yes.

20 **SIR WYN WILLIAMS:** So, effectively, in relation to criminal
21 prosecutions, the Board delegated the responsibility to
22 the relevant executives; is that it, in a nutshell?

23 A. Yes, it is it, in a nutshell. Can I say a little bit
24 more about that?

25 **SIR WYN WILLIAMS:** Yes.

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1 a Board structure such as the Post Office, of reviewing
2 decisions and recording how advice given by executives
3 was considered and looked at? We don't see that here,
4 do we?

5 A. I'm not quite sure what you're --

6 Q. There should be an audit system, a risk system, where
7 you look at the advice that the executives are giving
8 you and analyse it, audit it and minute it. Did you
9 just accept what the executives were telling you and not
10 act any further?

11 A. No, we often questioned what -- the advice that we were
12 being given and -- and the other thing that I was
13 supported by the Board in trying to get accepted as
14 a kind of way of working was that, when things had gone
15 wrong, that we would look back at them and analyse what
16 had gone wrong so that we could learn lessons for the
17 future.

18 Q. Yes. Was there a practice in the Post Office whereby
19 the Board would review its own decision and then go back
20 to that decision and see if the decision was properly
21 made?

22 A. Well, that's what I'm referring to by talking about
23 introducing the culture of having lessons learned
24 reviews.

25 Q. Right. You said early on that you were let down by the

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1 A. I think it's in my witness statement that when I -- very
2 early on when I arrived in the Post Office, Susan
3 Crichton, who was then the General Counsel, explained to
4 me that the Post Office took private prosecutions and
5 that this was handled at arm's length from the Board,
6 and I accepted that proposition. I think now, knowing
7 everything that I know, we should have really early on
8 taken a paper -- there should have been at least a paper
9 to the Board, probably leading to further discussion or
10 briefing, so that we really, really understood what all
11 that meant.

12 **SIR WYN WILLIAMS:** Mm-hm.

13 A. And what happened was that, because we were plunged into
14 the separation negotiations, which were way behind
15 schedule, because I didn't have -- I didn't inherit
16 a fully functioning Board and I was populating it, for
17 all those other reasons, this was something that we did
18 not get to, which, with the benefit of hindsight,
19 I think it would have made a very big difference if we
20 had got to it early on.

21 **SIR WYN WILLIAMS:** Thank you.

22 Thank you, Mr Jacobs, I will give you an extra
23 minute or two if you need it.

24 **MR JACOBS:** Thank you, sir.

25 There should always be a system, shouldn't there, in

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1 executives and, at paragraph 82 of your statement, you
2 say that:

3 "Material information was only summarised in
4 an incomplete way."

5 You say:

6 "The Board didn't ask questions that might have got
7 to the truth of the matter."

8 The question I was going to ask you, Ms Perkins, is
9 which executives, in particular -- can you name them --
10 only gave you information in an incomplete way and
11 didn't give you enough information for you to properly
12 look at the matter?

13 A. Well, I discussed that with Mr Beer yesterday --

14 Q. Can you discuss it with me as well, please.

15 A. -- and I said that I thought that both Susan Crichton
16 and Chris Aujard, as General Counsel, had both -- had
17 not given us direct access to advice that we should have
18 been given or explained that advice to us clearly and
19 that some of the advice that they received was described
20 in a way that didn't give a full picture of the truth.

21 Q. Susan Crichton has said in her evidence that it was
22 unusual for there not to be a lawyer present as
23 a full-time Board member. Do you agree with that? In
24 retrospect, do you think if there had been lawyers on
25 the Board, these issues might have been grasped or

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1 understood a bit better?

2 **A.** I think there are two aspects to that. There's the
3 question of whether, had the General Counsel of the day,
4 been present at all Board meetings, these kinds of
5 issues might have been revealed to the Board. I think
6 on the basis of what we've seen, I don't think that we
7 can make that presumption in this instance.

8 I have said in my witness statement that, reflecting
9 on these events, which I have done at great length, I do
10 think that we lacked -- it was a -- we lacked having
11 somebody who was a non-executive member of the Board who
12 really had a grasp of the detail of these kinds of
13 issues, and that could have been -- it could have been
14 possible to have made the case for an extra Board
15 member, had I seen or had we seen that that skillset was
16 really necessary.

17 An alternative way of getting that expertise, which
18 I floated in my witness statement but which I'm not
19 completely convinced about, is whether what we should
20 have done is to have gone and got some external advice,
21 which would come directly to the Board on these matters.
22 But one of the reasons why -- there are several reasons
23 why I'm not sure that that would have made a difference
24 and it's very detrimental to the relationship between
25 a Board and its executives to bring in that kind of --

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1 Do you accept, or did you know at the time, that
2 a subpostmaster facing prosecution, if that person knew
3 about the possibility of remote access to a branch, they
4 would be in a position to say there's scope for doubt
5 that the alleged shortfalls in the system emanated from
6 the system, and not from them.

7 **A.** Could you take me to that paragraph in my witness
8 statement?

9 **Q.** Yes, of course. It's 225, which is on page 113 --
10 page 112, I'm sorry. Around about the fifth line:

11 "As I mentioned I was not aware that this was
12 an issue that could threaten the integrity of
13 prosecutions, and would have expected to be advised if
14 this was the case so that the Board could act in the
15 light of all the relevant information."

16 Then you go on to talk about the Ismay Report and
17 having no backdoors. Has that refreshed your memory?

18 **A.** So I am saying this in the -- I'm saying this in the
19 context of what we were discussing at the Audit and Risk
20 Committee on 23 May 2012, in the context of this Ernst &
21 Young audit.

22 **Q.** Yes.

23 **A.** That's where I'm saying that. I'm not saying I never
24 had any idea that remote access was an issue. What I'm
25 saying here is that I didn't make the connection between

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1 can be -- to bring in that kind of external advice. It
2 creates tensions in the relationship, which can have
3 adverse consequences.

4 **Q.** Do you accept now that, if you had had a lawyer full
5 time on the Board, it would have been less easy for the
6 executives to pull the wool over your eyes?

7 **A.** You're talking about a Non-Executive Director, is that
8 what you're talking about?

9 **Q.** Yes.

10 **A.** Possibly, yes. I can't be sure. It would have depended
11 on -- you know, it would have depended on a great many
12 things and one of the other things that we will never
13 know is, had the Board asked more questions than it did,
14 had the Board pursued some of these things that we
15 should have pursued in more depth, now that -- you know,
16 now that -- we can see that now, knowing what we know
17 now, would it actually have got to the truth? I don't
18 think we can -- I certainly can't be sure of that.

19 **Q.** I want to move on to the question of remote access. You
20 say at paragraph 225 of your statement that you weren't
21 aware that the question of remote access was an issue
22 that could threaten the integrity of prosecutions and
23 you go on to say you would have expected to have been
24 advised if this was the case, so that the Board could
25 act in the light of all relevant information.

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1 the point that was being made in this Ernst & Young
2 audit, about their ability to audit the accounts, and
3 the position of subpostmasters. That's what I'm saying
4 here.

5 **Q.** Were you aware that Post Office knew about the remote
6 access capability from 2010?

7 **A.** No, I wasn't aware of that and it says -- absolutely
8 I wasn't aware of that. If I'd known that, I would have
9 behaved in a different way.

10 **Q.** There is a document that's known to the Inquiry where
11 there was a discussion, a meeting in September 2010,
12 between Fujitsu staff and Post Office staff --

13 **A.** In 2010?

14 **Q.** -- in September 2010 -- before your time --

15 **A.** Okay.

16 **Q.** -- before your time --

17 **A.** Right.

18 **Q.** -- in relation to the mismatch bug, and one of the
19 solutions -- I'm just going to read it out -- was:

20 "... Alter Horizon branch figure at the counter to
21 show the discrepancy. Fujitsu would have to manually
22 write an entry value to the local branch account."

23 Then it said:

24 "IMPACT -- When the branch comes to complete the
25 next trading period they would have a discrepancy which

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1 they would have to bring to account."

2 Then:

3 "RISK -- This has a significant data integrity
4 concern and could lead to questions of tampering with
5 the branch Horizon system and could generate questions
6 around how the discrepancy was caused. This solution
7 could have moral implications for Post Office changing
8 branch data without informing the branch."

9 So they knew all about it in 2010 and my question
10 for you is: how is it that this information, the
11 knowledge of the Post Office, never came to the Board's
12 attention?

13 A. It was -- I'm not the person who can answer that
14 question, I'm afraid.

15 Q. You had responsibility to protect the interests of
16 subpostmasters. This was a key issue that went to the
17 integrity of prosecutions. All the meetings, all the
18 papers that you read, all the consultations that you
19 had, why did this issue never come up? Why did you
20 never raise this? Why did the Board never raise this?

21 A. Because we were being given constant repeated assurances
22 that remote access was not possible.

23 Q. You said yesterday that the problem with the Post
24 Office's conduct and the points that were missed were
25 that it was because people were not paying attention and

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1 paragraph 79.2.3, in the witness statement, which is
2 WITN00740100, and it's page 34. If we could scroll
3 down:

4 "The Board also received a paper on supplementary
5 evidence which the Post Office was trying as part of the
6 BIS Select Committee investigation, in which the issue
7 of suspense accounts was discussed. I understand from
8 this paper that the BIS Select Committee was informed
9 that the Post Office was denying Second Sight access to
10 information about movements into and out of the suspense
11 account."

12 A. "I understand that in June 2014 Second Sight asked the
13 Post Office to explain the operation of its suspense
14 account and the Post Office replied in July 2014."

15 Q. Yes. Were you aware at the time why this was being
16 asked? Subpostmasters -- who paid money to the Post
17 Office, on account of alleged shortfalls, so they could
18 continue trading and not be prosecuted or have their
19 contracts terminated -- physically handed money over to
20 the Post Office and Second Sight believed that that
21 money, the subpostmasters' own money, was absorbed into
22 Post Office general accounts. Were you aware that that
23 was the nub of the issue here?

24 A. I think I have explained that I didn't understand this
25 at the -- I didn't know about the suspense account issue

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1 you said maybe it was too difficult. You also said, in
2 your words, that "cock-up rather than conspiracy lay
3 behind the failures that led to Post Office defending
4 the Horizon system in the way that it did".

5 Do you now accept, looking back, that there was
6 a conspiracy? People were lying to MPs, people were
7 lying to the Board. This was quite deliberate. It
8 wasn't just not paying attention or it being too
9 difficult. Can you accept that now?

10 A. I simply do not know, as I said yesterday, why people
11 did not pass on information that they should have passed
12 on to the Board.

13 Q. Finally, I'm going to ask you about suspense accounts.
14 Now, I know you've said that that wasn't an issue that
15 you had a great deal of knowledge about but there was
16 a paper that the Board received after the Select
17 Committee meeting in February 2015, where the Select
18 Committee said that the Post Office was denying Second
19 Sight access to information about movements in relation
20 to suspense accounts. Do you recall that?

21 A. I think I covered that in my witness statement.

22 Q. You did, yes, paragraph 79.2.3.

23 A. Would you mind putting it up -- I can't remember
24 everything -- it's a long statement.

25 Q. Of course, it's a long statement, Ms Perkins. So

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1 directly and that's what I'm saying in my witness
2 statement. I've got nothing to add to that.

3 Q. Well, taking suspense accounts out the question, then.
4 What did the Board do to look into what had happened to
5 the money that these people paid; was that something
6 that ever came up?

7 A. I don't remember that the Board did look into that.

8 Q. Are you able to say why it is that, even today,
9 subpostmasters do not know how the money that they paid
10 was accounted for, where it has gone?

11 A. I can only talk about the things that I knew about when
12 I was in my position.

13 Q. From your experience, from when you were in your
14 position?

15 A. I can't give you --

16 Q. You can't answer that question?

17 A. I can't answer that question.

18 Q. I am just going to see if I have any more questions to
19 ask.

20 I'm asked to ask you, in relation to your opening
21 statement to the subpostmasters yesterday, you said:

22 "I'm sorry that I cannot say that, despite serious
23 efforts on my part to get to the bottom of what was
24 going on, I did not succeed in doing so during my four
25 years at the Post Office and, therefore, the suffering

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1 of those affected was prolonged."

2 Those subpostmasters who we represent maintain that
3 your efforts as Chair of the Board were seriously
4 lacking. Can you respond to that, please?

5 **A.** I would say that I made some -- took some big steps to
6 try and deal with this issue. When I was faced -- not
7 faced -- when I first heard that Lord Arbuthnot had
8 issues that he wanted to raise in relation to this,
9 I agreed to see him immediately without hesitation.
10 I got the distinct impression from him that he had not
11 been able to get that kind of response from anybody in
12 Royal Mail or Post Office before that.

13 At my first meeting with him, I suggested that there
14 should be an independent review of those cases. I went
15 back to the Post Office and said that this was what
16 I had suggested. I was told it was a bad idea, that it
17 was unnecessary and that the Post Office didn't have the
18 capacity to handle that. Absolutely nothing happened
19 about it. I wouldn't let go. I went back and argued
20 for it. It was then agreed that we should have that
21 review.

22 I was then pushing, and pushing, and pushing for the
23 terms of reference of that investigation to be broadened
24 and not limited in the ways that were being suggested
25 and, later on, I and the Board, as a whole, were very

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1 hindsight, I and/or the board should have taken things
2 further.

3 **SIR WYN WILLIAMS:** Thank you, Mr Jacobs.

4 **MR JACOBS:** Thank you. I have no further questions.

5 **SIR WYN WILLIAMS:** Right, I will take back a few minutes
6 from Mr Beer and we will start again at 2.15 -- sorry,
7 2.10. Can't take too many minutes back from him!
8 2.10.

9 (1.13 pm)

10 (The Short Adjournment)

11 (2.10 pm)

12 **MR BEER:** Sir, it's Ms Watt on behalf of the NFSP and then
13 Mr Henry.

14 **SIR WYN WILLIAMS:** I'm just going to move a little this way
15 so I can see you, Ms Watt.

16 **Questioned by MS WATT**

17 **MS WATT:** Good afternoon, sir. Although, I think if
18 Mr Henry sits there then maybe Ms Perkins can't see me.
19 Sorry, thank you.

20 **SIR WYN WILLIAMS:** We're fine now.

21 **MS WATT:** Thank you very much.

22 Good afternoon, Ms Perkins. I ask questions on
23 behalf of the NFSP. At paragraph 4 of your witness
24 statement, I'm not going to turn it up, I'm just going
25 to return to something you say there, you say:

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1 open/supportive of the idea of doing a second kind of
2 review through Deloitte, which, as I discussed this
3 morning with Mr Beer, was something which was not
4 followed up in the way that I think with the benefit of
5 hindsight, it should have been.

6 But there were a whole load of steps that were taken
7 by me that made a difference, not in the way anybody
8 would have wanted, but --

9 **Q.** Yes.

10 **A.** Is that -- I would also like to say, since I'm having
11 this thrown at me, that there were a number of other
12 steps that were taken while I was Chair of the Board,
13 which include the fact that we reviewed the prosecutions
14 policy, and I would personally have taken that further
15 and, had I known, and had the Board known, of the first
16 piece of Simon Clarke Advice, I am very, very clear that
17 we would have taken a decision to stop private
18 prosecutions at that point. And we had already been
19 told that, once the Second Sight review was under way,
20 prosecutions based entirely on Horizon evidence were
21 ceased.

22 **Q.** Ms Perkins, what blame do you accept, personally?

23 **A.** I think we've covered a lot of that over the last day
24 and a half. I have talked about instances where I --
25 specific instances where I think, with the benefit of

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1 "The failures by the Post Office and the Royal Mail
2 Group prior to the separation of the two companies were
3 considerable and devastating in their impact on the
4 lives of many affected subpostmasters and their
5 families."

6 I just wanted to start off by asking if you would
7 expand that to acknowledge that the failures also had
8 a devastating impact on postmaster assistants, Crown
9 Office employees and their families because they were
10 also prosecuted and are also victims?

11 **A.** Yes.

12 **Q.** Would you agree that the failures throughout, and that
13 includes the period 2011 to 2015, when you led the
14 Board, also had a considerable impact on the communities
15 that the affected post offices and subpostmasters
16 served?

17 **A.** Yes, they must have done.

18 **Q.** I'm sorry, I'm not able to hear you --

19 **A.** Sorry, my fault. It's because I was trying to see you
20 and I moved away from the mic, sorry.

21 **Q.** Thank you. Would you accept that this is a continuing
22 situation, in other words it is the case, isn't it, that
23 there is a devastating impact on the post offices and
24 subpostmasters of today from the damage done to the
25 reputation of the Post Office and, therefore, to the

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1 value of their investment in their businesses?
 2 **A.** I'm afraid I'm not familiar with how the Post Office is
 3 currently faring in that way.
 4 **Q.** Do you accept that that is caused or substantially
 5 contributed to by the failures of you and your Board at
 6 the material time? Just to explain, by "failures",
 7 I mean the failure to notice, question and act on any
 8 material piece of information, all as discussed in your
 9 evidence these last two days, which might have brought
 10 a different outcome to this?

11 **A.** I think I have accepted over the last two days that
 12 there were specific areas where I think that the Board
 13 or I should have pursued things. I have, I think,
 14 covered that ground. But, as I have also said, there
 15 were a whole number of areas where, either as
 16 a consequence of my personal actions or the Board
 17 actions, things were done which made -- which led to --
 18 I mean, the fact that we set up the Second Sight
 19 Inquiry, notwithstanding the problems with that, did
 20 lead to the unravelling, in the end, of all of this, and
 21 there were a number of actions that we took which were
 22 very positive in this context.

23 During the time that I was in the Chair, the number
 24 of prosecutions being carried out by the Post Office
 25 dropped to zero in two of the years and I think to one

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1 path to breaking even. But, clearly, what's happened
 2 has had a very, very big impact on that. But I can't,
 3 you know, I can't elaborate on that, I'm afraid.
 4 **Q.** Well, just thinking about that financial aspect that
 5 you've mentioned, at paragraph 36 of your witness
 6 statement you say that the Government's vision for
 7 turning the Post Office around was making it sustainable
 8 by developing new streams of income, modernising it and,
 9 in the process, making it profitable instead of
 10 loss-making and, therefore, ready for mutualisation, if
 11 you recall that is in your witness statement?

12 Can I ask you, then, was the Network Transformation
 13 programme something that you were aware of/involved in?

14 **A.** Yes, I was aware of it.

15 **Q.** How hands on would you say the Government relevant
 16 departments and ministers were in relation to the
 17 Network Transformation Programme?

18 **A.** I think they were well aware of it. It was a central
 19 part of their policy in relation to the Post Office.

20 **Q.** Thinking a bit more about the Network Transformation
 21 Programme then, can you say what work was done by the
 22 Post Office, along with Government and relevant
 23 departments to identify and put in place new income
 24 streams which would have been required for Network
 25 Transformation to actually be profitable for

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1 or two in one of the years. It was a completely
 2 different picture from the picture which I inherited.
 3 **Q.** Just picking up on that, you've said several times
 4 during your evidence that, certainly at the start of
 5 your tenure, you lifted the rock to see what was
 6 underneath. Can I put it to you that, while that may
 7 well be the case at the start, would you accept that
 8 what then happened is you put the rock back down and
 9 just became part of the corporate reputation protection,
 10 which was, at the very least, completely incurious?

11 **A.** So I wouldn't accept that, no. I don't think there's
 12 really anything that I can add substantively to what
 13 I've said on this subject.

14 **Q.** Just finally on this part, would you accept that this
 15 scandal and your part in it has had an impact on the
 16 British taxpayers, who were effectively the source of
 17 funding for the Post Office's legal fees throughout what
 18 might be described as a war of attrition in defending
 19 the indefensible?

20 **A.** Well, it certainly is the case -- I mean, I don't know
 21 what the current state of the finances of the Post
 22 Office are and to what extent it is dependent on
 23 taxpayer subsidiaries. All I can say is that during the
 24 period when I was in the chair, we were making real
 25 inroads on that subsidy and the Post Office was on the

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1 subpostmasters?

2 **A.** So you're talking here about new business for the Post
 3 Office; is that what you're talking about?

4 **Q.** Yes.

5 **A.** Yes. So there were, I think, three big streams of
 6 income, Mail's was the biggest, and there was a lot of
 7 time and energy spent on the relationship with Royal
 8 Mail, and trying to put that partnership on a much
 9 better footing, and to deal on the front foot with the
 10 increase in online shopping, parcel delivery and all of
 11 that, which was very, very, very difficult because the
 12 Royal Mail and the Post Office were behind the game,
 13 compared to the competition.

14 There was the Financial Services aspect, which was
 15 relatively small when I began in the chair, but we
 16 rebooted our relationship with the Bank of Ireland to
 17 provide a proper platform on which we could develop the
 18 Financial Services offer, and that was going well, and
 19 there were very ambitious plans for it, which were not
 20 realised in my time.

21 And then the third aspect, which I suspect may be
 22 what you are getting at, was Government business, where
 23 we had been told by the Government of the day was a very
 24 important part of the -- plank in their strategy for
 25 growing the Post Office's revenue, which was

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1 a disappointing -- it was a disappointment because it
 2 wasn't coming through in the way that had been expected.
 3 **Q.** So if we take the way in which the Network
 4 Transformation Programme was effectively sold to
 5 subpostmasters, is it not the case that, in truth,
 6 certainly on the Government business side, if nothing
 7 else, there really were no revenue streams and this
 8 programme was, effectively, falsely sold to
 9 subpostmasters?
 10 **A.** I don't think it was falsely sold. I think there was
 11 genuine intent to deliver the government services plank
 12 of that, alongside the other things. It was not the
 13 only thing. But I would agree that, for understandable
 14 reasons, that government business was not won by the
 15 Post Office because the Post Office was often not
 16 commercially the most attractive vehicle for delivering
 17 those services. And the Government -- in principle,
 18 a government could decide that it was so important to
 19 maintain a flourishing Post Office Network that you
 20 would mandate Government departments to use those
 21 outlets for the delivery of those services.
 22 I don't think that would have been legal, actually,
 23 but, in principle, you could make it legal but that was
 24 not what was on offer, and it was a personal
 25 disappointment to me, that. I put a huge amount of
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1 Board level?
 2 **A.** Yes, it did reach Board level.
 3 **Q.** Yes. So from the point of view of trying to assess risk
 4 and whether or not it could have a material impact on,
 5 to use the archaicism, the Group as a whole, or,
 6 post-2012, the separated Post Office, that would be
 7 something where the Board would obviously work in close
 8 conjunction with the Executive Team and also General
 9 Counsel?
 10 **A.** Yes.
 11 **Q.** Now, I want to just ask you, please, at paragraph 298 of
 12 your witness statement -- and there's no need to get it
 13 up -- but you refer to a document that was prepared by
 14 General Counsel, Mr Aujard, and the reference is
 15 WITN00740131. I wonder if we could have a look at that.
 16 It's paragraph 298 of your witness statement, in case
 17 you have a hard copy of your witness statement.
 18 **A.** Unfortunately, I didn't bring my hard copy witness
 19 statement back in with me, I'm sorry. So I would like
 20 to look at that, please.
 21 **Q.** Well, then I'm afraid, sir, my time is going to be --
 22 **SIR WYN WILLIAMS:** Don't worry, we'll do it quickly,
 23 Mr Henry. Let's have WITN00740100 on the screen, and
 24 page 145, paragraph 298, just so that Ms Perkins can
 25 refresh her memory about that.
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1 effort into trying to explain to Government departments
 2 and to ministers of Government departments what it was
 3 the Post Office had to offer Government. But, as so
 4 often happens -- and I know because I've been inside it
 5 as well as outside it, Government departments -- it's
 6 very, very difficult to get Government departments to
 7 collaborate on a Government-wide initiative that doesn't
 8 actually individually benefit an individual department,
 9 if you see what I'm saying. So it was disappointing.
 10 **MS WATT:** Thank you very much.
 11 Those are my questions, sir.
 12 **SIR WYN WILLIAMS:** Thank you. You look as if you're poised,
 13 Mr Henry.
 14 **MR HENRY:** As poised as I'll ever be, sir.
 15 **SIR WYN WILLIAMS:** All right okay, I'll stay in this same
 16 position. I can see both of you. Yeah.
 17 **Questioned by MR HENRY**
 18 **MR HENRY:** Ms Perkins, can I just ask you, please,
 19 prosecutions, you say, were kept at arm's length from
 20 the Board.
 21 **A.** Yes.
 22 **Q.** Now, obviously, that is prosecuting people but
 23 litigation risks, in other words civil and criminal
 24 appeals which could result in massive damages being
 25 awarded against the Post Office, that must have reached
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1 **MR HENRY:** I'm very grateful.
 2 **A.** So I'm looking at paragraph 298, is that right?
 3 **Q.** Yes.
 4 **A.** Can we scroll down to the rest of the paragraph, then.
 5 Thank you.
 6 **Q.** Now, can we go to the actual document WITN00740131. Can
 7 we concentrate, please, on paragraph 2.3:
 8 "The headline conclusion of the backward looking
 9 report [which is the Altman General Review of October
 10 2013] is that '... review (of the cases that had been
 11 prosecuted over the last few years) is fundamentally
 12 sound' and that no 'systemic or fundamental flaws in the
 13 review process' were detected. In addition, a number of
 14 relatively small procedural recommendations were made
 15 regarding matters such as document retention etc."
 16 Now, "document retention" is a euphemism for
 17 shredding: the unlawful, the unauthorised destruction of
 18 documents that ought to be preserved under the Criminal
 19 Procedure and Investigations Act. You tell us that your
 20 General Counsel, of his own volition, must have decided
 21 to use that disgraceful euphemism to mislead you and
 22 your fellow Board members.
 23 **A.** I don't think I've used those words. I don't remember
 24 using words in relation to this sentence.
 25 **Q.** Well, you're saying that it was kept back from you,
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1 paragraph 298 -- you've just read the paragraph. I may
2 be embroidering it but what you're saying is that this
3 was -- and I will put words into your mouth --
4 a disgraceful action by your General Counsel to not
5 fully apprise you of risk, not fully apprise you of what
6 was going on in the business.

7 **A.** I think if you look at that last sentence, I mean,
8 obviously, it depends who you are and it depends what
9 else you already know but, to me, that reads like a kind
10 of bland sentence. It could mean anything. To me, that
11 does not mean shredding of documents relating to either
12 past or current actions in relation to prosecutions.
13 I'm really sorry but I simply cannot make -- that's not
14 a connection that I think you would reasonably expect
15 somebody coming to this to see.

16 **Q.** That is not -- and you're a very intelligent woman, that
17 is not the thrust of my question at all. I'm not
18 suggesting that you ought to have read that as
19 "shredding". What I am suggesting, however, and I will
20 put it to you straight, is that this must have been
21 curated, between you, the Chief Executive and General
22 Counsel, that a sanitised version of the truth was
23 perpetuated in Board documents, as opposed to the
24 unvarnished truth?

25 **A.** That is absolutely untrue and I find that question
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1 What I want to suggest to you is that the language that
2 Mr Aujard is using is a reflection of the reality that
3 you wanted to see and hear. That's why euphemisms are
4 being used in Board documents. It is a reflection of
5 what you desire, your strategy, your vision, which you
6 set for the company. Let's go to POL00344895 and can we
7 scroll up, please. Mr Beer took you to this morning
8 and:

9 "The position is intrinsically worrying (to put it
10 politely) [et cetera, et cetera]. The NEDs are really
11 concerned because of the potential costs to the
12 business, the distraction from implementing our strategy
13 (which is demanding enough), the reputational issues and
14 their personal positions. A bad combination made far
15 worse if the business does not appear to be on top of
16 it. So the paper needs to demonstrate that the Board's
17 concerns on the latter point are unnecessary -- if that
18 is possible."

19 I suggest to you that the "if that is possible" is
20 a throw away post-hyphen part of the sentence:

21 "... the paper needs to demonstrate that the Board's
22 concerns on the latter point are unnecessary ..."

23 This was a reflection of your style of leadership,
24 wasn't it?

25 **A.** I don't accept the premise of your question and I think,
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1 offensive.

2 **Q.** I'm very sorry if you find it offensive but the fact is
3 that you have said that things were "surprising",
4 "extraordinary", "disappointing", "astonishing"; a whole
5 range of epithets have dropped from your lips to
6 apparently excuse the Board's stupefying ignorance on
7 matters of central importance and I'm suggesting to you
8 that that cannot be right, that you must have been
9 known?

10 **A.** You can suggest that to me as often as you would like,
11 in as many different words as you would choose: it is
12 absolutely categorically untrue, and I am on oath and
13 I am a truthful person.

14 **Q.** I want to deal with the issue that Mr Beer took you to
15 very briefly about embedded commands and you deny, or
16 cannot recall, ever teaching Ms Vennells a lesson, but
17 she claimed that you taught her how to craft a question
18 to subordinates with an embedded command, a skill, in
19 other words, that you ask a question in which you
20 mandate the answer you require.

21 The famous example of that is: is it possible to
22 access the system remotely, et cetera, et cetera. You
23 remember, perhaps, or have read about, her questions
24 before Parliament.

25 I want to take you now to a document. POL00344895.
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1 if I may say so, if you look at some of the other
2 documents, amidst the huge quantity of documents that
3 are available, you will see that there are examples of
4 where I have made it absolutely clear to colleagues, to
5 executive colleagues, that I was always ready to face
6 bad news and would deal with it head on. What I didn't
7 want was apparently bad news that was not properly
8 evidenced and that was my -- that was absolutely my
9 position but I do not accept that I ever, either
10 directly or indirectly, encouraged people not to give
11 the full truth.

12 **Q.** Well, let's just change tack then and deal with that
13 because I suppose a demonstration of that would have
14 been your pushing back against the inertia demonstrated
15 by your colleagues and your fighting really hard to
16 address Mr Arbuthnot's concerns.

17 **A.** Is that a question?

18 **Q.** Yes, that would be an example of you, you know, wanting
19 clarity and candour and wanting to get to the truth, so,
20 as you profess this morning, that you fought really hard
21 to address Mr Arbuthnot's concerns, as he then was. Do
22 you remember saying that?

23 **A.** I did. I did try to do that, yes.

24 **Q.** But you didn't commission an independent report at any
25 stage, did you?
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1 A. What was the -- well, I shouldn't ask you questions.
 2 The Second Sight review was an independent review.
 3 Q. But I'm talking about a review of the Ismay conclusions,
 4 of which you were aware, because you had read the Ismay
 5 Report and you were, at one point in your leadership,
 6 concerned that, if a proper and full independent review,
 7 contrary to Mr Ismay's conclusions, was not undertaken,
 8 then it would look as if the Post Office was unsure of
 9 its ground. You never commissioned, did you, a full
 10 forensic digital review of the software system?
 11 A. So I think we have covered -- have covered this ground
 12 already. Lord Arbuthnot raised concerns with me about
 13 the subpostmasters' positions. I offered to look at
 14 setting up an independent review. He and I then had
 15 some discussions about that and it was important, if we
 16 were going to take this initiative, which people in the
 17 Post Office didn't want to take, some people in the Post
 18 Office didn't want to take, that we did this on a basis
 19 that he thought he and his colleagues would regard as
 20 a proper basis. And there was quite a lot of discussion
 21 with him about the best way of doing that.
 22 It was in the light of those discussions that we
 23 went down the route of employing Second Sight, rather
 24 than going down the Deloitte route. We looked at that
 25 yesterday and I spent a certain amount of time, and

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1 A. That doesn't mean I didn't see it. I'm just -- we're
 2 talking about something that happened 10 years ago.
 3 Q. That may be right but is your evidence that you cannot
 4 say whether you read it or not and --
 5 A. I think I would -- since we've now established and we
 6 have clearly established that it came to me and my
 7 fellow Board members, I think I would have read it.
 8 SIR WYN WILLIAMS: So that I'm clear, what you're
 9 acknowledging reading is the briefing report --
 10 A. Yes.
 11 SIR WYN WILLIAMS: -- not the full document?
 12 A. Yes, sorry.
 13 SIR WYN WILLIAMS: Right.
 14 A. And, actually, could I just say something about that --
 15 SIR WYN WILLIAMS: Yes.
 16 A. -- because, had I seen the full -- I mean, I don't know
 17 whether you -- anybody here has -- well, I'm sure lots
 18 of people have seen it -- the full report, when I looked
 19 at it again earlier this year, has one of those colour
 20 ratings, red, amber and green, against the different
 21 items and, if you just take one look at that report, you
 22 can see that there's an awful lot of red and an awful
 23 lot of amber in there. And, if I had seen that, even if
 24 I hadn't read a word of the text, it would have jumped
 25 out at me.

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1 quite a lot of energy, trying to get the terms of
 2 reference of that piece of work as extensive and open as
 3 I could.
 4 Now, I have said that, with the benefit of
 5 hindsight, I now think that that wasn't the best -- that
 6 wasn't, in retrospect, the best way to have gone about
 7 that and I wish that I'd had a fully populated Board by
 8 then, and, even though I didn't have a fully populated
 9 Board by then, that I had used the other non-executives
 10 who were in position to help me think this through and
 11 to put the commissioning of whatever kind of review we
 12 decided to go for on the best possible footing, really
 13 having gone into what is it that we were trying to
 14 achieve here and what would be the best way of doing
 15 that and, if need be, if we'd come to the conclusion it
 16 would have been better to go down the route of using one
 17 of the Big Four, to have that conversation with Lord
 18 Arbuthnot.
 19 Q. Ms Perkins, did you actually read the Deloitte report?
 20 A. Well, we discussed that this morning. If you're talking
 21 about the Board Briefing, I talked about that with
 22 Mr Beer this morning. I didn't, until I saw that report
 23 in the disclosures sometime earlier this year, I didn't
 24 remember seeing it.
 25 Q. So, I mean, it --

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1 MR HENRY: You've said many times that you would have turned
 2 over every stone and that you've been asked about that,
 3 but could I ask you, please, in the light of what was
 4 the highly contentious Second Sight Interim Review and
 5 the lessons learned, can you explain why, in early
 6 September 2013, your Chief Executive Officer resiles
 7 from a full Lessons Learned Review, having received
 8 advice from Andrew Parsons that it would expose the Post
 9 Office to proactive duties of criminal disclosure? Were
 10 you aware of that?
 11 A. We discussed this yesterday. I was not aware of it.
 12 Q. In fact, that reference -- no need to take you to it --
 13 is POL00146243. But could I ask you, please, now to be
 14 shown POL00381706, 11 September 2013.
 15 We can see the heading "Lessons learned [terms of
 16 reference]", PowerPoint for the Audit and Risk
 17 Committee, and then if we could scroll up, please, from
 18 Ms Vennells to you, 11 September -- to Alasdair Marnoch,
 19 but copied to you. Then could we scroll up, please.
 20 Then we see this, do we not, from Paula Vennells to
 21 Alasdair Marnoch -- he was, of course, dealing with
 22 insurance, wasn't he?
 23 A. Alasdair Marnoch was the Chair of the Audit and Risk
 24 Committee.
 25 Q. Absolutely but he was also dealing with the notification

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1 issue to the insurers, together with Chris Day?

2 **A.** In his -- yes, he was, yes.

3 **Q.** Yes, copied to you, obviously to the Company Secretary

4 as well, and then could we scroll up, please, and then

5 this:

6 "Most of the note [so this did come to you] should

7 be self-explanatory, although I should explain the

8 rationale behind our proposed timings. As we discussed

9 last week, there is a choice between proceeding with the

10 review in the near future, while the experiences are

11 still relatively fresh in our memory, or waiting until

12 early 2014 (when we expect [Second Sight] will no longer

13 be involved in the process). Having de-risked the

14 review by narrowing its scope and running it as a short

15 internal exercise, on balance I think it is more

16 important to capture our insights sooner rather than

17 later. We are therefore proposing to commence the

18 process in October (not earlier because it would be more

19 appropriate for both sides to wait until Susan is no

20 longer working in the building).

21 "Alice and I had chance to discuss at our 121 this

22 morning and we are both comfortable. I would welcome

23 any comments you have."

24 Why was it so important for Susan Crichton to be

25 gone?

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1 happening in the Post Office, and this seemed to be

2 a good example of a way of introducing that.

3 **Q.** No, no, Ms Perkins, this intimately connected to the

4 advice given from Andrew Parsons and also Hugh

5 Flemington, 3 September, about the risk: proactive

6 criminal disclosure. Now, we know that Ms Crichton knew

7 from an early stage, even before the drafting of the

8 Clarke Advice, that she knew about the unsafe witness.

9 I, again, want to ask you, please, why it was so

10 important for Ms Crichton to have left the business

11 before embarking on this de-risked, internal, much

12 narrower in scope Lessons Learned Review.

13 **A.** I can't add anything to what I have already said.

14 **Q.** I see.

15 **SIR WYN WILLIAMS:** Can we just look at -- I am sorry, I may

16 have missing the threat of this, Mr Henry, it's my

17 fault.

18 The reference at the beginning "Most of the note

19 should be self-explanatory", can I just be sure what the

20 note is that it's talking about? Is it an attachment to

21 this email or what?

22 **MR HENRY:** No, sir.

23 **SIR WYN WILLIAMS:** So it's just that expression that you

24 were exploring?

25 **MR HENRY:** Yes, I'm afraid I may be wrong and I would be

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1 **A.** I think -- I mean, I don't remember this, the reasoning

2 behind the change in the scope of the Lessons Learned

3 Review. I have wondered about that in recent weeks

4 myself. I think the key point about Susan was that she

5 had been -- I mean, this a Lessons Learned Review about

6 the way in which Second Sight had been appointed to run

7 this review. It was about things such as the absence of

8 an engagement letter, things that we've talked about to

9 do with the timetable, the costs, the lack of proper

10 liaison with them, and Susan had been the person who was

11 in charge of that.

12 Obviously, as long as she was employed in the

13 business, it was going to be a much more sensitive issue

14 in respect of her and her personal position than it

15 would be once she had decided to go. But the need, in

16 my view, to look at how that had been handled and learn

17 lessons from it was just as great, after she had gone,

18 as if she hadn't gone, because the point was that it was

19 about improving the way the Post Office, in its newly

20 separated state, went about doing things like that.

21 And I was aware of the fact that this wasn't --

22 I mean, in a lot of organisations, it's absolutely

23 normal for people to do lessons learned reviews after

24 something has gone wrong or even when things --

25 important things have gone right, and I didn't see that

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1 very happy to be corrected.

2 **SIR WYN WILLIAMS:** No, that's fine. So the position is you

3 are exploring whether this note referred to the document

4 which Mr Parsons may have been the author of, which

5 makes reference to Gareth Jenkins, in effect, whereas

6 Ms Perkins, as I understand it, is reading that as being

7 a note concerned with lessons learned and something

8 different; that's it, isn't it?

9 **A.** Thank you very much.

10 **SIR WYN WILLIAMS:** Fine. As long as I understand what's

11 going on here.

12 **A.** Yes.

13 **SIR WYN WILLIAMS:** Fine. Right.

14 **MR HENRY:** I mean, the position is that you're using Susan

15 Crichton as a lightning conductor, aren't you?

16 **A.** No.

17 **Q.** It's really you and Ms Vennells resolving that this

18 contentious material should not come before the Board

19 because the material is so troubling in its implications

20 that it would have forced the Board to make proactive

21 disclosure to convicted defendants, had it seen it;

22 isn't that the position?

23 **A.** It is absolutely not the position.

24 **Q.** So as a strategy of managing the risk between you and

25 Ms Vennells, geld or downplay the Second Sight Report

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1 and keep Gareth Jenkins out of the picture?

2 **A.** No.

3 **Q.** I mean, what would have happened on 16 July if --

4 because of course Ms Vennells spoke to Ms Crichton's

5 report, didn't she?

6 **A.** She did.

7 **Q.** Yes. So, therefore, she must have been apprised of the

8 issues and discussed the matter with Ms Crichton

9 beforehand, otherwise she wouldn't be able to speak to

10 the report?

11 **A.** Well, I don't think you can necessarily infer that

12 because, as we discussed yesterday, it wasn't until the

13 morning of the Board itself that, in the light of what

14 had happened over the Non-Executive Directors breakfast,

15 that I took the decision to start the discussion on that

16 paper without Susan being in the room and, as

17 I explained yesterday, that discussion took off in such

18 a way that it became impossible, really, to get into

19 a situation where we could have that discussion with

20 Susan in the room.

21 But Paula, as she said herself, I think, didn't know

22 that I was going to ask to kick off that discussion

23 without Susan. I didn't know that we wouldn't resume

24 a discussion on the paper without Susan being in the

25 room because it -- events just overtook us -- overtook

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1 had informed your Chief Executive Officer that there

2 were likely to be many, many claims for damages based

3 upon what she was aware of. So it would have been

4 dynamite. What I'm suggesting to you is a *cordon*

5 *sanitaire*, it was boxed up and never ventilated before

6 the Board for that reason.

7 **A.** If it was boxed up, it was not boxed up by me and, if

8 there had been dynamite, we would have dealt with it.

9 That was a group of people who were very independent

10 minded, they were thoughtful people, they had good

11 values. It would have been very difficult but we would

12 have dealt with it.

13 **Q.** One does continue -- I mean, one does continue to wonder

14 why significant advices of Mr Altman, Queen's Counsel,

15 as he then was, did not percolate up to the Board during

16 the period July to October 2013. Can you think of any

17 reason why those significant advices of considerable

18 importance, in fact momentous importance, didn't

19 percolate their way up to the Board?

20 **A.** Mr Beer asked me about this yesterday and I reflected on

21 it. I don't know why they didn't. There are all kinds

22 of reasons why they might not have done and I'm not in

23 possession of the facts as to why they didn't.

24 **Q.** Can you help us, please, though with your

25 contemporaneous knowledge at that time, because, for

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1 me.

2 **Q.** You're the Chair; events do not overtake the Chair; the

3 Chair sets the scope and the agenda.

4 **A.** Yes, that's absolutely true but, on this occasion -- and

5 this does sometimes happen -- you're in a room with

6 a group of people, and they're human beings, and

7 sometimes things kick off and sometimes it isn't the

8 right thing to do to try and ram on with what you had

9 previously thought would be what you would do. You do

10 sometimes have to flex things and, as I said yesterday,

11 I now regret that I didn't, after that Board meeting,

12 after what had happened, think to myself -- and I regret

13 that nobody else thought of it either -- that we should

14 have arranged a separate discussion on that paper, which

15 Susan would have attended.

16 But I'm not -- having said that, none of us know

17 what would have happened had we done that and we do not

18 know what, if anything, more Susan would have

19 contributed to that discussion than was in the paper.

20 **Q.** It would have been dynamite, wouldn't it, because not

21 only did you have the paper -- and the paper of course,

22 even though she knew about Gareth Jenkins, leaves that

23 out --

24 **A.** Yes.

25 **Q.** -- but you do have her evidence to the Inquiry that she

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1 example, the announcement of the flotation of the Royal

2 Mail Group took place on 10 July 2013, did it not?

3 **A.** I don't remember the exact date but around that time,

4 yes.

5 **Q.** The fact is that the Royal Mail shares were floated on

6 11 October 2013 at 330p per share but, on the 16th, when

7 they started to trade unconditionally, they were 24

8 times oversubscribed. That was obviously a matter that

9 was in your mind at the time, wasn't it?

10 **A.** No. Not particularly. I mean, obviously I -- from the

11 emails that we -- I've seen, there was an issue about

12 the Royal Mail prospectus but that was not looming large

13 in my mind at the time. It was just one of those issues

14 that needed to be handled.

15 **Q.** Well, funding must be very, very important for any chair

16 because, of course, you've got to fulfil the vision of

17 the Government and the vision of the Government was to

18 turn around the business, eradicate losses, and

19 modernise it and, to do that, you needed Government

20 funding and support, didn't you?

21 **A.** Yes, but I don't see what the connection is between that

22 and the flotation of Royal Mail.

23 **Q.** Well, the reason why is because, after the flotation,

24 which raised nearly £2 billion -- 1.98 -- the Government

25 announced 640 million to be invested in the Post Office,

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1 and that was on 27 November 2013. I mean, there is
 2 a connection, isn't there?
 3 **A.** I have no idea. I really don't see that connection.
 4 The fact is that we had been -- the Government's policy
 5 in relation to the Post Office, the continuation of the
 6 subsidy until the point at which we broke even and the
 7 investment made in the Post Office, in order to break
 8 even, was something which was being discussed, as far as
 9 I was aware, completely separately from the Royal Mail
 10 Group flotation.

11 I never heard anybody make that connection and I had
 12 discussions myself with officials in the Treasury and
 13 with the Chief Secretary; nobody ever made that
 14 connection. I think that there were two completely
 15 separate things going on there.

16 Nobody knew, at the time when the policy in relation
 17 to the modernisation of the Post Office was announced,
 18 whether Royal Mail would float. I mean, there had not
 19 been a very successful history of that, in the past. So
 20 I may be completely wrong about this but I personally do
 21 not see those two things as being connected in that way.

22 **Q.** From July 2013, the green light was on, because that was
 23 the announcement by Vince Cable, the Secretary of State
 24 and, of course, that coincided with the perfect storm of
 25 Second Sight Interim Review and, also -- although

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1 prospectus?

2 **A.** I've seen -- recently re-seen those emails, and it
 3 wasn't -- I mean, clearly, I was involved in discussions
 4 with the CEO about that.

5 **Q.** Yes, "I have earned my keep on this one". Did it not
 6 occur to you -- I mean, from the point of view -- and
 7 I don't know your experience in this field, although
 8 I know that you do coach and lecture on corporate
 9 governance -- but, surely, the whole issue of
 10 a prospectus is that you load the prospectus with
 11 risk -- you load the prospectus with risk, so that
 12 nobody is misled or nobody is, as it were, induced to
 13 invest on a false basis. Yet we know for a fact that
 14 the Post Office was in the process of notifying its
 15 insurers concerning the prospects of civil litigation
 16 regarding wrongful convictions.

17 I mean, do you not see the extraordinary
 18 contradiction there with your CEO, who knows about
 19 disclosure to the insurers and yet she's having matters
 20 removed from the RMG prospectus?

21 **A.** I don't know the full -- I haven't got the full
 22 documentation on this issue. It is, however, clear from
 23 the email that this was an issue which had been being
 24 discussed, both within the Government machine and within
 25 the Post Office, that this prospectus was in draft,

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1 I understand your denials on the point -- the emergence
 2 of Gareth Jenkins as a serious problem for the Post
 3 Office. So, I mean, you have seen, surely, the
 4 statement to Parliament by the Minister of State,
 5 9 July, which was stressing that none of the issues in
 6 the Second Sight Report have any impact on the Royal
 7 Mail, which is an entirely separate business: Jo
 8 Swinson. You probably also saw the whip's briefing,
 9 which stated that Mr Arbuthnot's support for the
 10 subpostmasters could be distracting to the flotation.

11 **A.** I've been reminded of those things but you were making
 12 a completely -- what I thought -- I'm sorry if I've
 13 misunderstood you. I thought you were saying that the
 14 Post Office wouldn't have got its money from the
 15 Government if Royal Mail hadn't floated so successfully.
 16 That's what I was arguing with you about.

17 **Q.** No, no, I'm not saying that, but it's obvious, however,
 18 that, if nearly £2 billion comes in to the Treasury, it
 19 makes it a lot easier for 640 million to go out to the
 20 Post Office and these things cannot be looked in
 21 hermetically sealed boxes, as it were.

22 But I want to come to this: if you're saying that
 23 Post Office Limited had really absolutely nothing to do
 24 with this, then, surely, you must have been extremely
 25 concerned by the intervention of your CEO with the

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1 representations from various different organisations
 2 connected with the Royal Mail would be invited on that
 3 draft, and the Post Office had -- and the officials in
 4 the Business Department were thinking about the way in
 5 which this was described and made some representations
 6 to the Royal Mail Group about that.

7 The ultimate -- the process of putting a prospectus
 8 together is highly regulated. Slaughter & May were in
 9 there and, in the final analysis, it was for the Royal
 10 Mail Group to decide what was in its prospectus or not
 11 within its prospectus.

12 **Q.** The problem, however, cannot be separated from the fact
 13 that the Royal Mail Group had been historically
 14 responsible for prosecutions before separation, had it
 15 not?

16 **A.** Yes, it had.

17 **Q.** No need to take you to it, but that was a document that
 18 you saw earlier today, and you were enquiring as to
 19 liability for the Post Office as well before and after
 20 the split. Do you remember that?

21 **A.** Would you mind taking me back to that, please?

22 **Q.** Yes, certainly.

23 **SIR WYN WILLIAMS:** Does this add to the point, Mr Henry?

24 **MR HENRY:** It doesn't really add to the point.

25 Those are my questions, sir.

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1 **SIR WYN WILLIAMS:** Thank you very much.
 2 Now then, I know that Ms Patrick is going to ask
 3 some questions.
 4 I understand that Ms Leek wants to ask questions,
 5 and I further understand, Ms Leek, that you're going,
 6 please, be about ten minutes, is that right?
 7 **MS LEEK:** That's right.
 8 **SIR WYN WILLIAMS:** Well, let's have that now, if that
 9 doesn't inconvenience Ms Patrick, and when we can have
 10 our afternoon break.
 11 Just for you to know -- well, she'll introduce
 12 herself. Why am I speaking?
 13 **MS LEEK:** Thank you, sir. I think I said 10 to 15 minutes.
 14 **SIR WYN WILLIAMS:** Well, we'll see how we go.
 15 **MS LEEK:** Thank you.
 16 **Questioned by MS LEEK**
 17 **MS LEEK:** Ms Perkins, I ask questions on behalf of Paula
 18 Vennells. I am Samantha Leek.
 19 I just want to ask about one issue and I want to try
 20 and clarify with you when you first knew about the
 21 existence of bugs. I'm going to ask Mr Enright to move
 22 a little to the left so we can see each other, thank
 23 you.
 24 Mr Beer asked you yesterday if the two exceptions or
 25 anomalies, to use the preferred language, as he said,
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1 "Rod Ismay and Lesley working the detail of the 2
 2 bugs, to understand them and then get them into language
 3 that is clear and can be communicated.
 4 "Mark is putting in place expert external comms
 5 resource to be dedicated to this issue from Monday ..."
 6 If we go down a little, to the bottom bullet point:
 7 "We think [Second Sight] will present the 4 cases,
 8 some of which will not be finished, but we are not sure
 9 yet. They will also raise the issue of the 'bugs' which
 10 were outside the cases but which we disclosed to them."
 11 If we can then scroll up to the email that was
 12 forwarded to you from Ms Vennells:
 13 "Alice hi. I do hope your Friday is good."
 14 We go down to the next paragraph:
 15 "You will see below Alwen's proposed next steps. It
 16 covers all the ground at present. We may update
 17 following today's phone call with [Second Sight] in
 18 an hour; and certainly will update post-Alwen's meeting
 19 with Janet on Monday."
 20 "Alwen and I are staying close (two calls already
 21 today) and I'm expecting an update later this
 22 [afternoon]. So no need to bother you today."
 23 If we go to the email above, which is your reply to
 24 Ms Vennells within the hour. You say:
 25 "Thanks for the updates. I am glad we have the best
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1 regarding Horizon, were not passed on to you at
 2 an earlier stage. You will remember that was before
 3 3 July. You said you couldn't remember if you were
 4 irritated, there was a lot going on.
 5 **A.** Mm.
 6 **Q.** I just want to show you a series of emails that suggest
 7 that you were told about bugs before 3 July. Can we
 8 start with POL00098797. If we go down to the bottom, go
 9 down to page 2 -- thank you -- there's an email from
 10 Alwen Lyons to Paula Vennells on 28 June, and we will
 11 have a look at that in a moment but we can see, if we go
 12 up a little bit, that that was sent to you by Paula
 13 Vennells on the same day, in fact just a couple of
 14 minutes after she was sent that email by Alwen Lyons.
 15 **A.** Can I look at Alwen's email for a bit longer, please?
 16 **Q.** Yes, I'm going to take you through that.
 17 **A.** Okay.
 18 **Q.** The first thing Alwen says here, subject, "next steps on
 19 Horizon issues -- update":
 20 "Paula
 21 "Rod Ismay and Lesley" --
 22 **MR BEER:** Can we ask for the thing to be scrolled down?
 23 **MS LEEK:** I'm so sorry. Could we bring that back up on the
 24 screen and scroll down to page 2. Thank you:
 25 "Paula
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1 people on this."
 2 We looked at the rest of this yesterday, about
 3 Maxwellisation/Salmon letters angle. So it seems clear
 4 from this email that you already knew about the bugs at
 5 this point because you don't reply "What are you talking
 6 about? What bugs? I've no idea what you're going on
 7 about here"; you say, "Thanks for the update".
 8 **A.** I do say that but I'm not sure what con -- you can't --
 9 I can't draw a definitive conclusion from that, as to --
 10 I don't recall ever having heard about these bugs before
 11 that.
 12 **Q.** Had you received an email from Ms Vennells on 28 June,
 13 at the point at which you knew Second Sight was about to
 14 report, setting out what she has said here about Rod
 15 Ismay and Lesley working out the details of the two
 16 bugs, surely you would have said, rather than "Thanks
 17 for the update", you would have said, "What are you
 18 talking about? I don't know anything about bugs"?
 19 **A.** I'm really sorry. I mean, I can see absolutely why
 20 you're saying that but I don't remember -- I'm not sure
 21 what I can add to this, I'm afraid.
 22 **Q.** Of course. Thank you.
 23 Perhaps we can now go back another six weeks to
 24 emails that took place on 16 May 2013, and if we could
 25 look at POL00098278. Ms Vennells sent you an email on
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1 16 May:
 2 "Hi Alice, lovely day!
 3 "Just to let you know I haven't forgotten about
 4 Vanquis -- I have an approach, which I have sent to Nick
 5 and Chris. I should get back to you shortly.
 6 "Also re James Arbuthnot -- I have asked for
 7 an update on our work plan by the end of this week, to
 8 make sure we are [on] track. (JA is away in committee
 9 business, so we are meeting post-Whitsun recess.)
 10 "One other issue arose overnight, which I may need
 11 to brief you on over the next couple of days, so will
 12 try to get a phone slot."
 13 If we scroll up, you send an email back:
 14 "Fine thanks. I am now unexpectedly freer this
 15 afternoon.
 16 "So if someone let's me know when you are able to
 17 talk I'll try and fit round that."
 18 Can we then go to POL00029587. By this point,
 19 a call has been arranged between you and Ms Vennells for
 20 the afternoon and Alwen Lyons sends to Paula "speaking
 21 notes for your call with Alice this afternoon". Can you
 22 just scroll up a little -- scroll down:
 23 "Paula here are my speaking notes for your call with
 24 Alice this afternoon.
 25 "I have a call with James on 23 May, next Thursday
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1 register at the office, and old Horizon bugs.
 2 "This is not good Alice, but from what we have seen
 3 so far our response to bugs has been effective.
 4 "I have asked for some time in our diaries next week
 5 to talk through our approach, and would welcome your
 6 counsel before the James meeting."
 7 Do you recall a conversation that afternoon in which
 8 you were told about those bugs?
 9 **A.** No, I don't.
 10 **Q.** So when you received the email on 28 June, giving you
 11 an update about what was going on with the bugs, are you
 12 saying that you hadn't been told about that beforehand
 13 or you simply can't remember?
 14 **A.** I can't remember, I'm really sorry. I've only -- some
 15 of this documentation has -- only came to me at
 16 lunchtime today. So, you know, I have had a look at it
 17 but I'm afraid I have absolutely no recall.
 18 **MS LEEK:** Okay. Thank you.
 19 Sir, I have no further questions.
 20 **SIR WYN WILLIAMS:** Thank you, Ms Leek.
 21 So we'll take our afternoon break now, and resume at
 22 3.30 when Ms Patrick will ask her questions and, if they
 23 are so advised, your legal representatives may wish to
 24 ask a few questions of you but that's up to them, not
 25 me. Then that will be it. All right?
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1 at 10.30, when we will discuss how he wants the
 2 investigation to continue ..."
 3 Just scroll up bit more, please.
 4 "Alwen will ..."
 5 We go down to the sixth bullet point -- I'm so
 6 sorry, the second bullet point:
 7 "... some instances are coming to light where there
 8 is evidence that there are bugs in Horizon, which I am
 9 being told is normal in any large computer system. But
 10 I am still being assured that the system's integrity is
 11 not in doubt.
 12 "Lesley is meeting Fujitsu tomorrow morning to go
 13 through the technical assurance that the subpostmaster's
 14 trading statement cannot be changed without their
 15 knowledge.
 16 "Alwen is meeting them on Monday to look at with
 17 a layman's eyes and understand what it might have looked
 18 like for a subpostmaster using the system.
 19 "The Good News is that where we have found bugs
 20 since HNG-X (new Horizon) they have been detected and
 21 put right with no also for the subpostmaster, and
 22 Fujitsu now monitor the suspense account for any such
 23 problems."
 24 "Alwen will specifically ask on Monday if anything
 25 could be happening we do not know about eg too small to
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1 **THE WITNESS:** Thank you very much.
 2 **SIR WYN WILLIAMS:** So 3.30.
 3 **(3.13 pm)**
 4 **(A short break)**
 5 **(3.30 pm)**
 6 **Questioned by MS PATRICK**
 7 **MS PATRICK:** Good afternoon, Ms Perkins. My name is Angela
 8 Patrick and I ask questions on behalf of 86
 9 subpostmasters who were convicted by the Post Office and
 10 have since had their convictions overturned, including
 11 Mrs Hamilton, who I'm sure you can see is sitting to my
 12 left.
 13 **A.** I do see.
 14 **Q.** We want to cover three topics.
 15 **A.** Yeah.
 16 **Q.** First, we're going to look at the Royal Mail Group
 17 prospectus, which you've just covered briefly with
 18 Mr Henry.
 19 **A.** Yes.
 20 **Q.** Second, Mr Beer has talked to you a little about
 21 Mr Davies and publicity around Horizon and I want to
 22 come back to one example of the Post Office's approach
 23 to subpostmasters in the media; and, finally, I want to
 24 look again at one of the first documents that Mr Beer
 25 took you to, and I'm going to call it the Zetter notes
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1 if you'll remember it from yesterday morning.
 2 A. You'll have to remind me, I'm sorry.
 3 Q. I'll refresh your memory, when we get that far. If we
 4 can start with the Royal Mail Group prospectus and
 5 Mr Henry has raised the flotation and you've talked
 6 about it not really being a topic that was looming large
 7 but you have mentioned a few emails.
 8 A. Mm-hm.
 9 Q. If we can look at a few of those, just to see where you
 10 were coming in.
 11 A. Yeah.
 12 Q. If we can start with POL00372265, please, and I want to
 13 start about halfway down page 1, if we could.
 14 A. Can you say just give me the context of this?
 15 Q. I will. This was an email sent on 16 August 2013 and,
 16 don't worry, I was only waiting for it to be on
 17 screen --
 18 A. Of course.
 19 Q. -- so we could look at it together.
 20 A. Okay, great.
 21 Q. I won't leave you hanging as to what we were looking at.
 22 There is an email here, you can see, at the top. It's
 23 Paula Vennells to you on 16 August and, if you see,
 24 she's messaging at the top looking for a time when you
 25 can have a call. I don't want to look at the detail but

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1 Q. The issue you were being told was arising it risks
 2 section of the prospectus.
 3 A. Yes.
 4 Q. It was very negative about the Post Office and Susan --
 5 I presume that might be Ms Crichton?
 6 A. I can't think -- well, it wouldn't have been Susan
 7 Barton.
 8 Q. It wouldn't have been Susan Barton. Ms Crichton was to
 9 flag that it might need to go to HMG, Her Majesty's
 10 Government, and Ms Vennells thought you might need to
 11 brief the Board properly at some stage. But she was
 12 saying, aside from whether the Board needed to be
 13 briefed, she was giving you this information now, wasn't
 14 she?
 15 A. She was.
 16 Q. Right. Can we look at the second document, a second
 17 email, and it's POL00419640. This is an email which
 18 moves us on a little -- and I'll wait for it to come
 19 up -- and I want to start at the bottom of page 1, where
 20 you'll see there's an email from you?
 21 A. Yes.
 22 Q. We're now a little while on, a few weeks on, three weeks
 23 on, 9 September 2013.
 24 A. Yeah.
 25 Q. You are sort of responding "Thank you for your previous

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1 she wants to catch you up on some issues and, if you can
 2 see, there's a list of four?
 3 A. Mm-hm.
 4 Q. If we go to the fourth bullet point and, if somebody
 5 could expand that, I'd be grateful. It says, "RM
 6 Prospectus"; can you see that one?
 7 A. Yes.
 8 Q. "... the language in the risks section, which refers to
 9 [the Post Office] is very negative. We are on the
 10 case -- it is being handled through external lawyers,
 11 and I have asked for a revised draft by Monday. I am
 12 not suggesting we flag this to the Board yet but you
 13 need to be in the picture. Susan has picked this up and
 14 insisted inaccuracies are removed and the tone improved.
 15 However, this is in the risk section, my guess is we may
 16 still be uncomfortable with final draft and so I have
 17 already asked Susan to flag to Will that we may want to
 18 escalate it to HMG. We will need to brief the Board
 19 properly at some stage but probably best when we have
 20 something to send out."

Now, I only have a few questions about it.

22 A. Okay.
 23 Q. You were, it appears, being briefed on this as an issue
 24 as early as mid-August in 2013?
 25 A. It does look like that, yes.

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1 emails". We don't need to spend much time on your
 2 response, I just want to note what you say to start
 3 with:
 4 "... I appreciate no surprises even if the news is
 5 unwelcome!"
 6 So that was the first message you were giving to
 7 Ms Vennells that day.
 8 A. Yeah.
 9 Q. Can we scroll up, the rest I don't think we need to look
 10 at in detail. I want to look at Ms Vennells' reply
 11 above, and it is the last paragraph of Ms Vennells'
 12 reply:
 13 "On the prospectus, now Mark is back I have him,
 14 Martin and Hugh meeting this pm and they will speak to
 15 BIS today."
 16 Would that be Mark Davies, Martin Edwards and Hugh
 17 Flemington?
 18 A. It could have been. I mean, I don't know. But that
 19 sounds -- you know, that sounds a perfectly reasonable
 20 suggestion.
 21 Q. So they were going to speak to BIS:
 22 "I am still not happy with the content: although it
 23 may be legally accurate, it is not helpful
 24 reputationally."

Then she goes on to say, ironically, Post Office has

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1 enough branches signed up to cover the distribution of
2 the prospectus and she is going to keep you posted.
3 I only have a few questions about this one. She's
4 telling you, even if the content was legally accurate,
5 her concern was primarily reputational risk, wasn't it?

6 A. Yes.

7 Q. Whose? Logically, would it follow she was concerned
8 about the reputation of the Post Office?

9 A. I don't know what she had in mind but it's a reasonable
10 interpretation that she's thinking about the Post
11 Office, yes.

12 Q. Could it be the reputation of the Royal Mail Group?

13 A. It could be.

14 Q. The Government?

15 A. No --

16 Q. Anyway?

17 A. -- I --

18 Q. You don't know, you're just speculating. Logically, it
19 could be the Post Office?

20 A. Yes, it could be.

21 Q. If we could scroll up little.

22 I'm sorry, Mr Henry was trying to attract my
23 attention, sir.

24 If we could just scroll a little, we see the next
25 section.

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1 reputational and not one of legal or technical accuracy,
2 do we?

3 A. No, no, you don't.

4 Q. Your focus was on how important it was going to be
5 politically; getting this sorted for Post Office was
6 politically important wasn't it?

7 A. Well, I think we've had this discussion a great deal
8 over the last two days, haven't we, and the inference is
9 often being made --

10 Q. Ms Perkins, can I stop you.

11 A. Yes, you can.

12 Q. I don't want you to draw any inference.

13 A. Okay.

14 Q. I just want you to reflect on what's in the email --

15 A. Okay.

16 Q. -- that what was being exchanged contemporaneously,
17 here, you were sending a message here that the
18 importance was political, weren't you?

19 A. Yes, I -- yes, I was.

20 Q. It was so important, you were sure you could rely on the
21 Minister to step in?

22 A. Yes, well, that I thought she would, yes.

23 Q. Indeed. Now, can we look at the third document. It is
24 POL00381730. Thank you. I want to start at the bottom
25 of page 1 again. Having scrolled to the very bottom, we

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1 A. What do you mean by the "next section"?

2 Q. I apologise, can you see "No I didn't mean that", where
3 you reply at the bottom of the part you can see on
4 screen there Ms Perkins, "No I didn't mean that"; can
5 you see?

6 A. I didn't mean what, sorry?

7 Q. I'm just trying to attract your attention. It's now
8 highlighted in yellow. You reply at 2.11:

9 "No I didn't mean that."

10 We don't need to look at the first line, it's the
11 second line.

12 A. Okay.

13 Q. "On the content of the prospectus, Will was absolutely
14 clear that this would be and should be properly sorted.
15 You only need to read the Hansard of last week's
16 Parliamentary debate to see how important that will be
17 politically. So I am sure Jo S would swing into action
18 on this if it were necessary."

19 So Will had given you some assurances, was that Will
20 Gibson at ShEx?

21 A. I should imagine so. I don't know.

22 Q. "Jo S", is that likely to be Jo Swinson?

23 A. I would think so, yes.

24 Q. Thank you. We don't see any challenge by you, in this
25 message, of Ms Vennells' view of the issue being

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1 can see the email that's from you. Can you see that,
2 Ms Perkins?

3 A. Yes.

4 Q. We're on Monday, 16 September now and you're writing to
5 Jorja Preston, who, I can see at the top there, that's
6 your PA; is that right?

7 A. Yes.

8 Q. The subject is "Mark Russell". We've hearing that name
9 earlier; was he the Head of ShEx?

10 A. He was.

11 Q. Great. You told Mr Beer that you would have regular
12 meetings with him. We'll see in the message here you're
13 talking:

14 "I think my main question is: what should my
15 objective be in talking to him about the Strategy and
16 Funding", I need to know the position, so that he is
17 aware of the Board and the package and what might be
18 needed to get the Fed on side.

19 You go on to talking about strategy and funding and
20 a number of other matters, until the second line from
21 the bottom, and you say -- sorry, third line from the
22 bottom:

23 "Also the update on where we are on Second Sight
24 etc. And the latest on the RM prospectus. So
25 basically, all the current hot topics."

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1 You say:
 2 "I would like to talk to Paula about this at my 1:1
 3 with her."
 4 This is you, I think, talking about preparing for
 5 a meeting with Mr Russell?
 6 A. It looks like it.
 7 Q. Is that fair?
 8 A. It does look like that, yes.
 9 Q. A number of topics, and the Royal Mail prospectus was
 10 a hot topic by this point, wasn't it?
 11 A. That would be the inference of this, yes.
 12 Q. If we can look at the fourth document, please, it's
 13 UKGI00002057, please. This is 18 September and it's not
 14 necessarily a message you would have seen, and you see
 15 it's a series of exchanges between Will Gibson and Tim
 16 McInnes.
 17 I would like to look very briefly -- it's a long
 18 message, I don't want to look at a lot of it, I just
 19 want to see where you're mentioned. Can we go to
 20 halfway through page 2, please. You can see there
 21 there's a message from Mr Gibson, we've heard him
 22 mentioned this morning, and I think we've heard Tim
 23 McInnes mentioned this morning also. But you see there
 24 he says:
 25 "... just to echo Tim's point re sign-off, I have
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1 Martin -- I presume Martin Edwards -- in advance of your
 2 meeting with Mark Russell; is that fair?
 3 A. It would appear as though that is how it's been
 4 described but we don't know what Martin said to Tim
 5 McInnes and we don't know -- I mean, we -- there's a lot
 6 we don't know.
 7 Q. He may come to give evidence and we may be able to ask
 8 him about that and, if we scroll up a little way
 9 further, you can see there on the screen -- actually,
 10 I can see it now, please stop scrolling, it's now moved
 11 to the bottom -- the reply there:
 12 "Not unhelpful -- I just don't want things to go
 13 nuclear until that's all we have remaining."
 14 Does that fit with your recollection of this
 15 discussion at the time? Was this discussion on the
 16 verge of nuclear status, for the relationship with Royal
 17 Mail Group and the Post Office?
 18 A. No, absolutely not. No. I'm sure that it wasn't.
 19 However, I mean, that is just my reaction based on what
 20 I know about how I would be thinking about something
 21 like this. But, just to be completely clear, until
 22 I saw these documents, either earlier today or
 23 yesterday, I can't even remember when I first started
 24 seeing this email chain -- I had -- I simply hadn't
 25 remembered anything about this issue at all.
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1 just come from a meeting with POL's CEO where she was
 2 voicing her concerns that not [all] POL's comments had
 3 been picked up and they have definitely not been signed
 4 off their wording! That said, we will ensure that we
 5 have chapter and verse from POL on what's outstanding."
 6 If we can scroll up from there to the bottom of
 7 page 1, I'd be very grateful.
 8 We can see there, there's a message from Mr McInnes
 9 back to Mr Gibson:
 10 "Yes. And I just had Martin on the phone ... Alice
 11 is properly up for a fight. I've bought some time but
 12 let's see what Emma can set up."
 13 Now, if we scroll up again, Mr Gibson replies, and
 14 you can say what he says:
 15 "Alice is coming in to see Mark tomorrow ..."
 16 That would fit with the timing of your preparation
 17 for a meeting, and, above, we can see the message
 18 continues. Were you up for a fight, Ms Perkins?
 19 A. I simply don't remember all of this, and those are not
 20 my words. I mean, what you're getting there is you're
 21 getting Tim McInnes reporting to Will Gibson something
 22 that somebody else has said to him.
 23 Q. Entirely. I wouldn't expect you -- as I said at the
 24 outset, you hadn't seen this message. But that was, it
 25 appears, how your position was being presented by
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1 Q. Okay. Well, if we can look at the last document,
 2 I just -- this is the last one I think I need to take
 3 you to, and it may refresh your memory a little bit
 4 about what was being discussed. It's POL00381747. It
 5 takes us forward to 20 September, and it's not, again,
 6 a message you would have seen, I just want to see if it
 7 will help your memory. It's a message you can see there
 8 from Mr Edwards to Paula Vennells, copied to Mr Davies.
 9 Again, it says, "Prospectus update".
 10 I'm sorry, I'm going to have to bring it up on my
 11 screen because that one is a little bit far away for me
 12 to read. I apologise. You'll have to bear with me for
 13 a moment. He's updating Ms Vennells. I won't read it
 14 all but I'm going to read the first bullet point
 15 a little. Focusing on the first bullet point:
 16 "Latest draft attached -- overall it has improved
 17 and addresses some of our concerns, although the risks
 18 section still, intrinsically, negative in tone. The
 19 ShEx POL team have pushed hard for additional language
 20 to be inserted on the strength of the relationship to
 21 contextualise these risks, but have received firm push
 22 back that this wouldn't be appropriate for this element
 23 of the document. Such language is however covered
 24 elsewhere in the document. My sense is we are going to
 25 have to accept this position and focus now on making
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1 sure the positive story is brought out in the wider
 2 comms materials -- the marketing materials for the
 3 transaction, our own lines to take and Ministers'
 4 statements."
 5 Now, focusing on that, the first bullet, it seems
 6 there were concerns about language in the risks section,
 7 but POL, Mr Edwards was saying, could just accept the
 8 position and then deal with it in comms; is that a fair
 9 summary?
 10 A. I think so, yes.
 11 Q. So it would go on Mr Davies' desk, possibly? He was
 12 copied in on them?
 13 A. Yeah.
 14 Q. Yeah, and if we scroll down, can we skip to bullet
 15 three. It seems -- except one issue is outstanding by
 16 this point. He writes, in the third bullet:
 17 "I think the one remaining issue we might want to
 18 seek to change now is the sentence on the [Second Sight]
 19 review, copied below. Ideally this would just be
 20 deleted because it is misleading in the context of
 21 a section on IT risks, as we discussed before.
 22 "In July 2013 [(this is the sentence he's talking
 23 about, the part], an Interim Report was published into
 24 alleged problems with [Post Office's] "Horizon" computer
 25 system, which is used to record transactions in its

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1 "... more likely to listen to you ..."
 2 Was this him, at this point, when the prospectus was
 3 imminent? Do you recall it being bumped up to
 4 Ms Vennells to deal with?
 5 A. I don't, I'm sorry.
 6 Q. Okay. Now, we know and the Inquiry has heard that
 7 Ms Vennells later reports to you by email that she
 8 thought she had earned her keep on this and she puts it
 9 in her review for the key achievements for the year. By
 10 this point, we know that when she reports to you it is
 11 going to be removed. You'd been involved, ShEx had been
 12 involved, you'd mooted something going up to the
 13 Minister; Ms Vennells, she did earn her keep on this
 14 one, didn't she?
 15 A. Well, it looks as though she got agreement to what it
 16 was that she was proposing. Those are her words;
 17 they're not my words.
 18 Q. Okay. No problem. We shall move on to the next topic,
 19 then, Ms Perkins, and I think these can be shorter. The
 20 next topic I wanted to look at was Horizon publicity.
 21 Now, Mr Beer covered Mr Davies' appearance on the
 22 Today Programme very briefly with you this morning.
 23 I remember you saying at home you listened to Radio 4
 24 Today every morning, and we talked about the appearance
 25 he made in December 2014. Now, Mrs Hamilton is sitting

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1 branch network. The report confirmed that no system
 2 wide problems had been found in relation to the
 3 "Horizon" software, but suggests that [Post Office]
 4 should examine its support and training processes for
 5 subpostmasters'."
 6 Now, I read that in full just to see if it helps
 7 with your memory but, in summary, Mr Edwards was saying
 8 that the Post Office wanted that deleted entirely,
 9 ideally; is that right?
 10 A. I think he is saying it would be deleted in the context
 11 of a section on IT risks. That's what he seems to be
 12 saying.
 13 Q. That ideally this would be deleted. We could skim the
 14 rest but we can get to the very bottom, and last four
 15 bullet points, I think we can see, he says -- and we've
 16 had this all before, the Inquiry has had this issue
 17 raised with Ms Vennells -- ShEx had been working on it
 18 and he says:
 19 "... we've reached the end of the road in terms of
 20 ShEx's ability to influence this", and he references
 21 that the prospectus is essentially going in on the
 22 Monday, so it's imminent.
 23 He says Alwen could pick it up but they were much
 24 more likely to listen to -- and this is a message to
 25 Paula:

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1 next to me. She also appeared on that programme that
 2 day and she listened live, as Mr Davies pointed to
 3 subpostmasters experiencing "lifestyle issues". Now,
 4 when Ms Vennells gave evidence, Mr Moloney asked her
 5 about a late evening message she sent later that month,
 6 on 17 December, having watched an episode of the One
 7 Show.
 8 A. I vaguely remember --
 9 Q. Do you recall?
 10 A. Vaguely. Only vaguely.
 11 Q. I might be able to refresh your memory. Can we look at
 12 POL00150352. If we could start -- it's a multiple-page
 13 document, if we could start at page 3, we can find the
 14 email from 17 December.
 15 You see there there's a message from Ms Vennells and
 16 it goes to Mark Davies, to Belinda Crowe, Gavin Lambert,
 17 Patrick Bourke and it's cc'd to you and it's sent in the
 18 late evening, at around 9.45.
 19 The Inquiry is very familiar with this. I'm not
 20 going to read much more than I need to but I think it is
 21 worth repeating. She writes:
 22 "Hi all, I managed to catch The One Show on iPlayer.
 23 "Not denying the fact that it is unhelpful and
 24 inaccurate (especially the focus on Horizon -- but see
 25 below re thoughts on that), Mark has achieved a balance

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1 of reporting beyond anything I could have hoped for.
 2 The statements stamped across the screen with the [Post
 3 Office] sign as a backdrop were really powerful. They
 4 emphasised everything we have done, and came across as
 5 ... fact! Very good.

6 "The rest was hype and human interest. Not easy for
 7 me to be objective but I was more bored than outraged.
 8 The MP quoted (who?) was full of bluster, and
 9 inaccurate. Jo Hamilton lacked passion and admitted
 10 false accounting on TV. [James Arbuthnot] was nowhere
 11 to be seen. And the bulletin was too long.

12 "What I thought was helpful was that it presented
 13 Horizon as the problem, which is exactly what [Second
 14 Sight] say they haven't found. And so easier for us to
 15 refute. There was nothing about intimidation, poor
 16 coaching and the message about not knowing how to use
 17 the system, in my eyes made the [subpostmasters] look
 18 inadequate."

19 Now, we can pause there and we can come back to the
 20 language. Mr Moloney asked Ms Vennells if she might
 21 have regretted that message the morning after she'd sent
 22 it and copied it to you. I'd like to look at the day
 23 after. If we could scroll up through this message
 24 slowly, I'd be grateful.

25 We can see the next morning, Belinda Crowe

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1 talking about campaigning SPMs? "Wilfully collaborated
 2 in bringing us into disrepute", what do you think of
 3 that language?

4 **A.** Well, looking at this now, obviously it looks absolutely
 5 dreadful.

6 **Q.** This is language being used by Ms Vennells herself,
 7 isn't it?

8 **A.** Yes, in this email it is, yes.

9 **Q.** You weren't copied in on this email but, if we can
 10 scroll up, we see Thursday, 18 December, 7.24, very
 11 early in the morning after the original message:

12 "Hi Alice, if you get the chance probably worth
 13 a view of The One Show. (From both your directorships,
 14 actually -- the BBC produced a very viewable 5-minute
 15 bulletin, pity it is so wrong.)

16 "The note below refers."

17 There's some personal message: it's very close to
 18 Christmas and she's talking about some cards getting
 19 off.

20 Now, she writes to you again, directly copying the
 21 whole of that thread, including her message from the
 22 last night. She sent you her One Show (*unclear*) twice.
 23 Now, if we can turn back to that original message on
 24 page 3, just so we have it in front of us. Did you take
 25 issue with what Ms Vennells was saying?

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1 circulates it to Angela van den Bogerd, if we can scroll
 2 up. What happens is Mrs van den Bogerd engages with
 3 a request from Ms Vennells about one of the
 4 subpostmasters who appeared in the programme, not
 5 Mrs Hamilton. I'm not suggesting we look at that
 6 detail, I just want to see where it goes next.

7 Can we scroll up a little way. We see Ms Vennells
 8 replies. I just want to stop there one moment. I don't
 9 want to look at the detail but I just want to raise
 10 a point which Ms Vennells uses about the language she
 11 used here. This isn't copied to you at this moment but
 12 it is later. At the very last paragraph of this, she
 13 says, "Chris," and it's copied to Chris Aujard:

14 "... If you didn't see The One Show, please can you
 15 watch the clip -- again I expect we are best to do
 16 nothing at this stage but [references the subpostmasters
 17 name] is completely out of order, inaccurate at best,
 18 lying at worst."

19 This is the part I want to look at, whether it is
 20 right or wrong, she says: "

21 "And has wilfully collaborated to [I presume that's
 22 'bringing'] us into disrepute."

23 Now, briefly, and we don't have to look at the
 24 detail, is this just another example of the belligerent
 25 language we had seen being used in the business when

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1 **A.** I don't -- I'm afraid I'm really sorry, but I've not --
 2 I don't think I've seen this before. I may have done
 3 but I simply do not remember this.

4 **Q.** We've seen the first and I've read it out, she was
 5 congratulating Mark Davies for a job well done. This
 6 was a win she wanted you to see, wasn't it?

7 **A.** It would look like it, yes. It would look like it.

8 **Q.** She was saying Mrs Hamilton lacked passion,
 9 subpostmasters looked inadequate. Did this simply
 10 reflect the attitude that was being adopted by the Post
 11 Office leadership team at that time in late 2014 to the
 12 campaigning SPMs, the subpostmasters?

13 **A.** I can't add anything to this, I'm afraid. I mean, it
 14 looks -- as I've just said, it looks absolutely
 15 dreadful, given what we know now, and I am -- I'm
 16 very --

17 **Q.** I'm going to stop you there, Ms Perkins.

18 **A.** Oh, I'm sorry.

19 **Q.** Not dreadful according to what we know now. Looking
 20 back, she sent it to you twice?

21 **A.** She sent it to me twice?

22 **Q.** Yes. She sent it to you on 17 December when she copies
 23 you in, she sent it to you the next morning, with the
 24 rest of the thread. Did you have any issue with the
 25 language she was using at the time? Can you remember

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1 taking it up with her? "Oh Paula, what have you done?",
 2 can you remember?
 3 **A.** I'm terribly sorry, I simply cannot remember any of
 4 this. I do remember the Today Programme because
 5 I remember hearing it but I don't remember this.
 6 **SIR WYN WILLIAMS:** Is there any written response?
 7 **MS PATRICK:** I haven't found one, sir.
 8 **SIR WYN WILLIAMS:** Okay, fine.
 9 **MS PATRICK:** Looking at Ms Vennells' language, she says she
 10 is "more bored than outraged". Had the business become
 11 bored by the subpostmasters campaign by this point?
 12 **A.** That's not how I would describe how I thought about it.
 13 **Q.** Did the business simply just want to move on and get on
 14 with the job of making the Post Office sustainable for
 15 the future?
 16 **A.** Well, the business did want to make the Post Office
 17 sustainable for the future but, as far as I was
 18 concerned and as far as I am aware my Board colleagues
 19 were concerned, we weren't wanting to do anything
 20 different from what we'd wanted to do all along, which
 21 was to handle the issues properly.
 22 **Q.** Handle the issues properly, but your CEO is "more bored
 23 than outraged".
 24 We move on. Can we look at the final topic and
 25 that is the Zetter note, and I do want to help your

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1 Mr Arbuthnot's office, as he was then, Lord Arbuthnot.
 2 **A.** Mm-hm.
 3 **Q.** If we skim through, we see some notes on the side, we
 4 see some handwritten notes there, if we scroll up, skim
 5 through 6 -- I don't want to go all the way to page 9,
 6 which is where Mr Beer took you yesterday. I want to go
 7 to page 7 in the little pack. Ah, it may be page 8 but
 8 I think it's page 7.
 9 There's a page, if we keep scrolling up, you see
 10 "Faults with Horizon", there, somebody has annotated it
 11 on the right with a little mark next to it. Scroll up
 12 a little further, keep going, please -- stop.
 13 We see a little scribbled note there and I want to
 14 look at it from the bottom up, it says, I think, there's
 15 a helpline -- it says, "There is a helpline available".
 16 It's underlining there is a helpline available. The
 17 Inquiry has heard a lot about the helpline. I don't
 18 want to go to that.
 19 The next one up, "Much cash around". Now, you told
 20 Mr Beer yesterday you'd been taken aback by the fact
 21 that there was so much cash in the business.
 22 **A.** This is not my handwriting.
 23 **Q.** It's not your handwriting. Is it possibly a note that
 24 was scribbled at some point during the meeting?
 25 **A.** It's not my handwriting.

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1 memory. Mr Beer started with this very early on
 2 yesterday and you said when you were looking at it --
 3 you were looking at handwritten notes, if you remember.
 4 **A.** Oh, yes.
 5 **Q.** You can be sure, of course, that you said in meetings
 6 sometimes you'd scribble on the papers and sometimes
 7 you'd go back and add a note afterwards to keep your
 8 memory fresh.
 9 **A.** Mm-hm, yeah.
 10 **Q.** Mr Beer took you to a lot of notes, and I just want to
 11 look at one scribbled note that he didn't look at and,
 12 if we look at the document, it's POL00413669, and that
 13 should bring us up with the diary page, if you remember,
 14 which referred to the Bistrot at The Zetter. If you
 15 remember, the date was 19 March, this was yesterday
 16 morning Mr Beer brought this up. It's between your
 17 first meeting with James Arbuthnot -- I think was
 18 13 March, and you were preparing for a meeting on
 19 28 March, which Paula couldn't attend, Ms Vennells
 20 wouldn't be able to go to. There was a pack of papers
 21 disclosed to the Inquiry behind this diary entry.
 22 I'd like to scroll -- we don't need to scroll, but
 23 if we could go to page 5 of the pack, Mr Beer skimmed
 24 through this yesterday to get to the main note but this,
 25 I think, was described as a meeting prepared by

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1 **Q.** Not your handwriting. Can we just explore the top
 2 message there "Reputation key"?
 3 **A.** It's not my handwriting.
 4 **Q.** Can you help with whose handwriting it might be?
 5 **A.** I'm sorry, I don't know whose handwriting that was. All
 6 I can tell you is that it's not mine.
 7 **Q.** It's in a pack of notes behind the same diary entry and
 8 with the same notes that you were taking, and you can't
 9 assist us on who took it?
 10 **A.** Well, it obviously, it could be Paula's writing. All
 11 I can tell you is that it is not my writing.
 12 **Q.** Okay, was this a message you were being given from
 13 within the business by Ms Vennells, or somebody else,
 14 that reputation was key, even at this time in 2012?
 15 **A.** I don't remember this coming up at this meeting.
 16 I mean, it is a responsibility of any Board to protect
 17 the reputation of the organisation. It's one of the,
 18 you know, it's one of the many responsibilities a Board
 19 has, and I think we have talked a lot in the last two
 20 days about why I thought, and other people thought, it
 21 was important to protect the reputation of the Post
 22 Office business, on the basis that I believed that the
 23 Horizon system was sound and that we didn't -- that --
 24 and the prosecutions had been properly conducted.
 25 **Q.** We've looked reputation in the context to of the RMG

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1 prospectus. We've looked at fighting -- we've talked
 2 about fighting for the reputation of the Post Office
 3 this morning. This is 2012, before your bulk of
 4 engagement with James Arbuthnot. I'm going to suggest
 5 reputation really was the key question for the business,
 6 not just as --
 7 **A.** Not mine.
 8 **Q.** -- a responsibility, it was a goal from the start, and
 9 throughout, wasn't it, Ms Perkins?
 10 **A.** Not mine. I've made absolutely clear what my motivation
 11 was in relation to Lord Arbuthnot's concerns.
 12 **Q.** Thank you.
 13 **A.** I wanted to set up an independent review to get to the
 14 bottom of it and I made it clear in a number of
 15 contemporaneous documents that I wasn't afraid of
 16 getting bad news, if bad news were to come.
 17 **Q.** Can we stop and pause there for a minute. Others have
 18 talked to you about the future of the Post Office, all
 19 the work that was going on, the Network Transformation,
 20 the shareholder, the Government's real goal for the
 21 business was to get to profitability and a mutualised
 22 Post Office that could stand on its own feet with less
 23 dependence on Government subsidy, wasn't it?
 24 **A.** It was, yes.
 25 **Q.** Would that be made more difficult if the Post Office was

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1 **MS PATRICK:** Thank you, Ms Perkins. I have no further
 2 questions.
 3 **A.** Thank you.
 4 **MR BEER:** I have spoken to Ms Berridge, who represents
 5 Ms Perkins, and she said, as long as I deal with one
 6 issue, which will take about three minutes; she is
 7 content not to ask questions.
 8 **SIR WYN WILLIAMS:** Fine.
 9 **Further questioned by MR BEER**
 10 **MR BEER:** It's a very small point of detail, and I don't
 11 think it will stop the world turning, but it's
 12 an important point of detail, perhaps.
 13 Can we look, please, for the last three minutes of
 14 questions, Ms Perkins, at POL00029587. You remember you
 15 were shown this email --
 16 **A.** Yes.
 17 **Q.** -- about half an hour ago, an hour ago --
 18 **A.** Yeah.
 19 **Q.** -- by Ms Leek?
 20 **A.** Yeah.
 21 **Q.** When she was introducing it to you, she said -- and the
 22 draft transcript reference is page 148, line 12:
 23 "Alwen Lyons sends to Paula, 'speaking notes for
 24 your call with Alice this afternoon'. "
 25 **A.** Mm-hm.

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1 no longer the nation's most trusted brand but, instead,
 2 faced public investigation and opprobrium for the
 3 wrongful prosecution of hundreds of its own people?
 4 **A.** Of course it would but -- I'm sorry, I am repeating
 5 myself, but this is really, really important.
 6 **Q.** Ms Perkins, I don't want you to repeat yourself.
 7 **SIR WYN WILLIAMS:** I think I've got this point.
 8 **A.** Okay, thank you.
 9 **MS PATRICK:** I just want to ask one last question, sir.
 10 Was this prospect that the Post Office was
 11 responsible for wrongfully criminalising people like
 12 Mrs Hamilton something that, during your time in the
 13 chair, the business simply could not or would not
 14 contemplate?
 15 **A.** Not as far as I was concerned and, as far as I can
 16 possibly be aware, that was not the position of my
 17 fellow Non-Executive Board Directors.
 18 **Q.** Looking back, do you think the Board might or ought to
 19 have been less bored by the subpostmasters and more
 20 outraged by the possibility of miscarriages of justice
 21 that had ruined hundreds of its own people?
 22 **A.** The Board was not bored of this issue. I have said on
 23 a number of occasions over the last two days that
 24 I think that there were inns instances where the Board
 25 should have acted differently.

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1 **Q.** In fact, if we look at the email, we can see that, on
 2 the face of the email, it's not sent to Paula Vennells.
 3 It's sent by Alwen Lyons to Alwen Lyons. Can you see
 4 that?
 5 **A.** Yes, I do see that.
 6 **Q.** The first sentence reads:
 7 "Paula, here are my speaking notes for your call
 8 with Alice this afternoon."
 9 So it could be, I suppose, that this is a draft that
 10 didn't get sent. It could be a way of sending something
 11 to yourself for printing off and handing over?
 12 **A.** Mm-hm.
 13 **Q.** But, on the face of the document, it wasn't sent to
 14 Paula Vennells, can you see that, as a speaking note,
 15 for her --
 16 **A.** I do see that.
 17 **Q.** -- conversation with you?
 18 **A.** Yes.
 19 **Q.** We haven't got any other evidence that this email was
 20 sent to Paula Vennells as a speaking note prior to the
 21 conference call that had been teed up with you.
 22 **A.** I see.
 23 **Q.** I should say, if we just look lastly at WITN01020100 --
 24 this is Ms Vennells' witness statement --
 25 **A.** Right.

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1 Q. -- at page 168 --
2 A. Mm-hm.
3 Q. -- paragraph 360, she says, "At 13.05", that's the time
4 of the email.
5 A. Right.
6 Q. "At 13.05 on 16 May, Alwen sent me a speaking note to
7 use on a call with Alice that afternoon", and then she
8 gives you the reference --
9 A. Okay.
10 Q. -- or gives us the reference to the document we've just
11 looked at.
12 A. I see.
13 Q. So it looks like the mistake was made there, as well,
14 that this was a note sent to Paula Vennells at 1.05 pm.
15 A. But in fact it was Alwen sending it to herself.
16 Q. Alwen sent it to herself.
17 A. Yes, I understand. Thank you. That's really helpful.
18 I'm sorry, I have got a bit -- I think I'm suffering
19 from brain fog.
20 MR BEER: Sir, they're the only questions I ask. Thank you.
21 SIR WYN WILLIAMS: So that brings an end to the questioning
22 of you, Ms Perkins. I am very grateful to you for
23 having provided a very detailed witness statement, and
24 for giving evidence over the last two days.
25 THE WITNESS: Thank you very much.

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1 SIR WYN WILLIAMS: Right. So we will adjourn now until
2 Tuesday at 9.45, when we will resume.
3 MR BEER: Thank you very much, sir.
4 (4.12 pm)
5 (The hearing adjourned until 9.45 am on Tuesday,
6 11 June 2024)
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