

Wednesday, 1 March 2023

1
2 (10.00 am)
3 **SIR WYN WILLIAMS:** Mr Stevens, before you start,
4 I understand the transcriber has Covid but feels well
5 enough to transcribe from home. That's correct, is it?
6 **MR STEVENS:** I think so, yes.
7 **SIR WYN WILLIAMS:** So in those circumstances, I think we
8 ought to try to stick fairly rigidly to having a break
9 after about an hour.
10 **MR STEVENS:** Yes.
11 **SIR WYN WILLIAMS:** I also understand, just for everyone to
12 know that if we proceed in that way with having more but
13 shorter breaks, it may be that we won't need a long
14 lunch break today and that we'll finish around about
15 1.30. That's not a promise to anyone, but that's
16 apparently how we might proceed. So I'm just letting
17 everyone know. We'll resume.
18 **MR STEVENS:** Thank you, sir. May I call Ms Allaker.
19 **ELIZABETH ANNE ALLAKER (affirmed)**
20 **Questioned by MR STEVENS**
21 **MR STEVENS:** Thank you, Ms Allaker, as you know my name is
22 Sam Stevens and I ask questions on behalf of the
23 Inquiry. Please can you state your full name.
24 **A.** Full name is Elizabeth Anne Allaker.
25 **Q.** Thank you for attending the Inquiry today to give

1

1 **Q.** Were you an auditor prior to the introduction of
2 Horizon?
3 **A.** Yes.
4 **Q.** Can you recall at that time where the audit team sat in
5 the Post Office, what department?
6 **A.** Do you mean whereabouts in the country or in --
7 **Q.** No, in the corporate structure.
8 **A.** I can't, actually, no.
9 **Q.** In general terms, as an auditor, when would you be asked
10 to investigate a sub post office?
11 **A.** Well, the audit process was routine anyway, so you try
12 to get round as many offices as you could within
13 whatever the timescales were. On top of that, if they
14 thought there was a risk to funds, if something had
15 flagged up anyway that suggested there might be a risk
16 of funds being lost, then we were asked to attend.
17 Also, for robberies and burglaries, following a robbery
18 and a burglary, there was an audit done of the office to
19 see what any --
20 **MR STEVENS:** Sorry, Ms Allaker, can we pause there, there's
21 a problem with the transcript I believe, sir. Sorry.
22 **SIR WYN WILLIAMS:** A problem in the sense of it not
23 appearing on our screens here or a problem with the
24 transcriber?
25 **MR STEVENS:** I'm just going to check now sir, I'll just be

3

1 evidence and thank you also for providing a written
2 statement to which I would like to turn now. It should
3 be in the bundle of documents in front of you under
4 tab A. For the record, the reference is WITN06200100.
5 Does that statement run to eight pages?
6 **A.** It does, yes.
7 **Q.** On page 6, the last paragraph should be paragraph 50 --
8 **A.** Yeah.
9 **Q.** -- and at the bottom should be a signature, is that your
10 signature?
11 **A.** It is, yes.
12 **Q.** Are the contents of that statement true to the best of
13 your knowledge and belief?
14 **A.** They are.
15 **Q.** That statement now stands as evidence in the Inquiry,
16 I will be asking you some questions on that and other
17 matters as well.
18 **A.** Okay.
19 **Q.** Firstly, in terms of background, you held various roles
20 with the Post Office from 1979 to 2001, including as
21 a counter clerk and an auditor?
22 **A.** Yes.
23 **Q.** I think you were an auditor in, is it, 1998?
24 **A.** It was thereabouts, yes, I can't remember the exact date
25 but I think I put what I thought it was in here.

2

1 a moment.
2 Thank you.
3 **SIR WYN WILLIAMS:** It seems to be general consensus it's
4 working now, yes?
5 **MR STEVENS:** Right. But it's being -- I understand it's
6 being transcribed it's simply not --
7 **MR JACOBS:** It's being transcribed because I've got it on
8 own my computer. It's showing on the screens but it's
9 stopped, it's frozen on the Inquiry screens.
10 **SIR WYN WILLIAMS:** Well, I think I said this on an earlier
11 occasion, if the problem is simply with our screens
12 here, but there is a transcription occurring, I propose
13 to carry on because we can all read the transcription
14 afterwards.
15 **MR STEVENS:** I'm grateful, sir.
16 I'm told we can refresh the screens in about five
17 minutes, so it should be back on within that period.
18 **SIR WYN WILLIAMS:** All right, fine.
19 **MR STEVENS:** Thank you. Ms Allaker, I apologise for that.
20 You were just talking about burglaries, I believe, when
21 I asked you to pause. Can you continue your answer?
22 **A.** Yes, so there would -- if there was a robbery or
23 a burglary, the audit team were asked to attend to
24 assess what shortfall there was following the robbery or
25 burglary. There would also be audits done if an office

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1 was transferring from one subpostmaster to another.
 2 I think that's probably it. Oh, if the office was being
 3 defunded for any reason, perhaps if there'd been --
 4 I don't know what's an example -- a flood or a fire or
 5 something like that, then, at that point, often the
 6 audit team would be asked to attend then and make sure
 7 everything was packed up and checked off before it was
 8 defunded, the stock was taken out and cashed.

9 **Q.** When you said funds at risk earlier, would that include
 10 if there was a discrepancy between -- a discrepancy in
 11 the account?

12 **A.** Yes. Yes, that -- if something had flagged up somewhere
 13 to suggest that there was a discrepancy, yeah.

14 **Q.** In practical terms, as a matter of practice, what level
 15 of discrepancy would it take to trigger an audit like
 16 that?

17 **A.** Oh, um, I don't know. I don't know whether there would
 18 be any particular level. I mean, you'd have -- probably
 19 things would have been checked first to make sure there
 20 was no transaction corrections or anything due or there
 21 hadn't been anything else wrong. It wouldn't always
 22 needed to have been a lot, you know, not talking tens of
 23 thousands or hundreds of thousands, or anything like
 24 that, it could have just been a few hundred or you know,
 25 into the thousands. It didn't have to be an awful lot

5

1 back to the contract and that was quite clearly written
 2 in the contract, that any loss, whether it was loss of
 3 by the subpostmaster or their assistants, was to be made
 4 good by the subpostmaster, if that was the contract that
 5 they'd signed. So that was the basis that we work to.

6 **Q.** If we could bring that contract up, it's POL0000254 and
 7 page 33, please. Clause 12 deals with losses and it
 8 says that:

9 "The subpostmaster is responsible for all losses
 10 caused through his own negligence, carelessness or
 11 error, and also for all losses caused by the negligence,
 12 carelessness or error of his or her assistants.
 13 Deficiencies due to such losses must be made good
 14 without delay."

15 Reading that, would you accept that what
 16 a subpostmaster is responsible for here is a loss, where
 17 it's caused by their own negligence, carelessness or
 18 error?

19 **A.** Yes.

20 **Q.** That's -- do you accept that's different from
 21 a subpostmaster being responsible for any loss however
 22 caused?

23 **A.** I can't think of any other kind of loss that could be
 24 caused.

25 **Q.** Well, if we take in Horizon the example of a discrepancy

7

1 of money. It was just the fact that there was
 2 a discrepancy there that nobody was getting to the
 3 bottom of.

4 **Q.** Pausing there, I want to pause on this issue of
 5 shortfalls. The Post Office contracted with
 6 subpostmasters from 1994 on the Standard Subpostmaster
 7 Contract.

8 **A.** Yes.

9 **Q.** That was modified on occasion. It was -- there were
 10 then new terms brought in 2011, the Network
 11 Transformation Contract. The questions I'm going to ask
 12 now concern the earlier contract, the Standard
 13 Subpostmaster Contract. Before I confirm to that, the
 14 Inquiry has heard evidence that the Post Office worked
 15 on the basis that subpostmasters were required to make
 16 good any shortfall that arose in the branch accounts?

17 **A.** Yes.

18 **Q.** Would you agree with that?

19 **A.** Yes.

20 **Q.** Was that always the case during your time at the Post
 21 Office?

22 **A.** Yes.

23 **Q.** Where did your basis for that position come from?

24 **A.** It was always explained that it was because it was
 25 a contract for services, then we -- you always referred

6

1 caused by the computer system itself.

2 **A.** Right, yes.

3 **Q.** Would you accept that that wouldn't be caused by
 4 negligence, carelessness or error of the subpostmaster?

5 **A.** Yes.

6 **Q.** So that can be taken down, thank you. The message and
 7 the position that Post Office considered subpostmasters
 8 would be responsible -- sorry, subpostmasters would be
 9 responsible for all losses, you said that came back to
 10 the contract, but was there anyone or anyone in
 11 management who was reiterating that position, as that
 12 was Post Office's position?

13 **A.** Not necessarily. I mean, because that was the contract.
 14 I think probably what I should say here is that, while
 15 I worked for the Post Office, whichever role I was
 16 doing, that that's the only clause that I remember, and
 17 at that point I don't think I or anyone else had any
 18 reason to believe that there could be any other way that
 19 a loss was caused. So the fact that the Horizon System
 20 could cause a loss just wasn't even considered.

21 **Q.** Moving on, after your counter clerk roles, you took
 22 a role in 2001. Could you briefly summarise what that
 23 was?

24 **A.** 2001 ...

25 **Q.** Sorry, for your reference, it's paragraph 4 of your

8

1 statement. You say --

2 **A.** It was in Darlington area office?

3 **Q.** Yes.

4 **A.** Yes, that was an administration role, so it was pretty

5 much administrating for -- there was an area manager and

6 I can't remember what all the job titles were at that

7 point but there were a number of people that worked from

8 that office, so it was booking appointments, answering

9 enquiries, that kind of thing.

10 **Q.** In 2012 you became a contract adviser?

11 **A.** Yeah.

12 **Q.** What did that role involve?

13 **A.** That involved managing contractual enquiries, it could

14 have involved interviewing subpostmasters.

15 **Q.** What would you have interviewed them about?

16 **A.** Well, if there'd been a discrepancy at audit for which

17 they'd been precautionarily suspended, I could have

18 interviewed them for that. It could have been in touch

19 with them about sickness, if they needed holiday

20 substitution, that kind of enquiries, that used to come

21 through.

22 **Q.** So on the interviews, in respect of -- it may be

23 interviews in respect of discrepancies?

24 **A.** Yeah.

25 **Q.** You said earlier that you, during this period considered

9

1 investigate it and there was no way that it could be the

2 Horizon System because of all the assurances that we

3 got.

4 **Q.** You say all the assurances you got, can you just expand

5 on that, please?

6 **A.** Well, we've always been of the impression that anything

7 that did go wrong with Horizon, that somewhere in the

8 background, it was put right. If it had got to the

9 point where a branch had a loss, they would receive

10 a transaction correction for it, or if a branch had

11 a loss that they couldn't explain, there was an option

12 to put it into the suspense account sometimes to see if

13 a transaction correction came back later down the line.

14 But any investigation had never -- or any, you know,

15 looking into losses, had never thrown up anything to do

16 with the Horizon System having caused the loss, so

17 I presume that, you know, we all just trusted what we

18 were told and that a loss couldn't be caused by the

19 system itself.

20 **Q.** Who gave you those assurances?

21 **A.** I don't know whether it was just generally everybody

22 said the same thing. I don't know that we necessarily

23 even looked at anybody for assurance. It was just that

24 if that came up ever, that's what we knew: that it must

25 have been mentioned at some point but I cannot honestly

11

1 that Horizon couldn't cause discrepancies.

2 **A.** Yeah.

3 **Q.** Was that a general view held by contract advisers, to

4 the best of your knowledge?

5 **A.** It would have been, yes, because my assumption, and

6 I presume everybody else's, was that although things

7 didn't always run smoothly in Horizon. There was always

8 some way of recovering or fallbacks to make sure that

9 anything that had gone wrong was put right. So, yes,

10 I would imagine that that would be the case, without

11 speaking for everybody else, but yes.

12 **Q.** As a contract adviser, were you ever -- did you ever

13 encounter a subpostmaster saying "This discrepancy,

14 I believe it's been caused by the Horizon IT System"?

15 **A.** No. Not directly, and certainly not during the period

16 that I was a contract adviser.

17 Later, down the line, then, yes, they did start to

18 be people who questioned that, if they did have a loss.

19 Not to me directly but I had heard of that being asked,

20 yes.

21 **Q.** If, as a contract adviser, you -- someone had said that

22 to you directly, what would your response have been?

23 **A.** I would have -- I probably would have done my best to

24 try to make them understand that it wasn't possible,

25 that, you know, that whatever had gone wrong we'd

10

1 point to one person and say they did.

2 **Q.** As a contract adviser, were you involved in intervention

3 visits?

4 **A.** Going out to a branch myself at that point, no, I don't

5 think I was. I was involved in -- I was involved in

6 intervention visits prior to that, I think. Possibly

7 during my time in the area office. I think I would be

8 asked to help out and go out and visit a branch for --

9 it could have been a robbery or a burglary.

10 **Q.** Did you ever go out for an intervention visit because of

11 a subpostmaster was requesting additional training?

12 **A.** No. No.

13 **Q.** Did you attend an intervention visit to investigate the

14 cause of a discrepancy?

15 **A.** Not, I don't think, during my time as a contract

16 adviser. Only during my time at Audit -- in the audit

17 team, I think.

18 **Q.** So 1998, pre-Horizon?

19 **A.** Yeah, yeah.

20 **Q.** I want to move on in the chronology to October 2013.

21 Please could we bring up POL00043370. This is

22 an attendance note for a meeting on 9 October 2013, it's

23 on Bond Dickinson headed paper. Are you aware of Bond

24 Dickinson's role in relation to the Post Office?

25 **A.** Yes.

12

1 Q. And that is?
 2 A. Bond Dickinson were legal representation for the Post
 3 Office.
 4 Q. We see in the attendance list there are "Legal", Rodric
 5 Williams, head of Post Office legal, was he, at that
 6 point?
 7 A. Mm-hm.
 8 Q. Martin Smith of Cartwright King. Do you recall his
 9 role?
 10 A. I don't recall his role, no.
 11 Q. We see at "Network", you're in attendance --
 12 A. Yeah.
 13 Q. -- and Gayle Peacock as well --
 14 A. Yeah.
 15 Q. -- Nick Beal. For the NBSC, it says that you're there
 16 on behalf of Kendra Dickinson?
 17 A. Yeah.
 18 Q. At this stage in 2013, were you involved with the NBSC?
 19 A. Yes, I used to work quite closely with the NBSC, to
 20 try -- well, try and make improvements to the way the
 21 structure was and to make improvements to -- I can't
 22 remember at that point whether the Branch Support Team
 23 was still there, but I sort of linked between the two of
 24 the teams, the Branch Support Team if they were still
 25 there then, they were still part of the Network teams.

13

1 them up. Whether it was to do with the Horizon or
 2 looking at this, some of it was more general things
 3 anyway.
 4 Q. So these were operational issues, discrepancies and the
 5 like --
 6 A. Yeah.
 7 Q. -- which were being discussed in a context with legal
 8 representatives at the Post Office --
 9 A. Yes.
 10 Q. Do you recall what the -- what sort of issues the legal
 11 team were interested in?
 12 A. Um, not in detail, no. I mean, if I hadn't had the
 13 documents I would probably have struggled to remember
 14 most of the things that were discussed but, looking at
 15 some of this, then there was certainly things that, you
 16 know, people were starting to say had linked to Horizon
 17 then. But, no, not specifics of anything, no.
 18 Q. Slightly different question. Do you recall if the legal
 19 team gave any advice on operational issues, such as what
 20 to do with the loss?
 21 A. Not that I remember. I think their advice was more
 22 legally based. But that's just memory. I'm picking up
 23 there.
 24 Q. If we can go to a different document, please it's
 25 POL00002276. At the top it says, "Horizon Service

15

1 Q. We'll come on to that in a moment but, in broad terms,
 2 yes involved --
 3 A. Yes.
 4 Q. -- but as a sort of oversight of what could be improved,
 5 rather than taking calls yourself?
 6 A. Yes.
 7 Q. If we could just go down on this attendance note to see,
 8 it refers to a number of issues in branches, which we
 9 don't need to go into detail, but my question is: what
 10 was the purpose of this meeting?
 11 A. I think would this be one of the meetings that were
 12 held -- I don't know whether it was monthly -- to try to
 13 just make sure that anything that was coming in on --
 14 that was referenced to the Horizon System or any losses,
 15 or anything like that, that they'd had -- they didn't
 16 overlap with anything that was going on with the
 17 Inquiry? Had the Inquiry started by this point?
 18 Q. Not at this stage. There was a Second Sight, this was
 19 around the time when Second Sight was --
 20 A. So it would be to make sure -- that's probably what I'm
 21 thinking of, then -- that we didn't overlap with any of
 22 the cases that were going on in Second Sight and that
 23 also were starting to take any learnings from cases that
 24 came up to make sure that, if there was things falling
 25 through the net anyway, that we were more likely to pick

14

1 Improvements Workshop" and it's 5 September 2013, so
 2 a month before but around the same time as the legal
 3 meeting we just saw. Do you recall the purpose of this
 4 meeting?
 5 A. Yeah, vaguely. I think this meeting was set up because,
 6 by this point, we were starting to get input from --
 7 well, the NFSP had mentioned improvements for a number
 8 of years and I can't remember whether we also had the
 9 branch user forum set up then, which was a little, small
 10 group of subpostmasters who used to attend a meeting
 11 quarterly. We'd set that little group up to try to get
 12 more input from subpostmasters. They used to go and
 13 talk to their own representatives.
 14 So I think the NFSP, the branch user forum and
 15 possibly other sources were all saying that there was
 16 improvements that they would like to see, and this
 17 workshop was to try to kick off some of that with
 18 Fujitsu. It was at Bracknell, wasn't it? Yeah. So it
 19 was to try to get them to understand, from the
 20 subpostmaster's point of view, what improvements they
 21 wanted going forward.
 22 Q. We see there in the attendee list NFSP, Jim Nott,
 23 postmaster.
 24 A. Yeah.
 25 Q. Do you recall how that postmaster was selected?

16

1 A. No, if my memory is correct, there was more than him
 2 actually due to attend but, for whatever reason on the
 3 day, Jim was the only one that did attend. I don't know
 4 whether there'd been another meeting come up or what had
 5 happened, but I'm pretty sure there were other people
 6 that were asked on behalf of the NFSP and Jim was the
 7 only one that could make it.

8 Q. You've mentioned about the NFSP and there being calls
 9 for improvements for a while. Can you recall if there
 10 was an immediate trigger which caused this meeting to be
 11 arranged?

12 A. Not to my knowledge. Not an immediate trigger.

13 Q. Please can we turn to page 4 and section 1.5. This
 14 talks about "Rem Out for End of Day Cheque Processing".
 15 Can you just explain very simply what that is?

16 A. Yeah, at the end of the day, you used to have to rem
 17 your cheques out and a lot of that depended on when
 18 the -- when your collection was from Royal Mail because
 19 they used to have been to be dispatched manually, so you
 20 used to have to cut them off and rem them out then, and
 21 then I don't know whether on a balancing day, or -- was
 22 it every day or just on a balancing day? I'm testing my
 23 own memory now -- they used to have to be remmed out
 24 again or something had to be done, definitely, at
 25 balancing.

17

1 in or not.

2 Q. So things like this, where improvements to make the
 3 system easier to use and potentially reduce error, were
 4 those findings of where there may be increased risk of
 5 user error, were they communicated to anyone in the
 6 audit team or the prosecutorial team?

7 A. Not communicated to, but I would say that the people in
 8 the audit team all knew of the processes where -- that
 9 were a bit clunky, really, that, you know, where it was
 10 likely that an error could be, so let's look there
 11 first, to make sure that there's not anything wrong. So
 12 the cheque rem out system would be one of the ones they
 13 would look at. They would always look at things like
 14 that to make sure that cheques had been remmed out, that
 15 they'd been remmed out correctly, et cetera, et cetera.

16 Q. So, in effect, is your evidence that where there were
 17 let's call it design issues, which increased the risk of
 18 a user error, the audit team would be well aware of
 19 that?

20 A. I would say so, yes.

21 Q. If we turn to page 6, please, and paragraph 2.4. This
 22 relates to "Transaction Correction Print Out", and it
 23 says:
 24 "The postmaster needs to be able to see which
 25 Transaction Corrections have been processed and which

19

1 I think the reason that that one was on the list,
 2 for looking at improvements, was because it was a bit of
 3 a clunky process, so there seemed to be a number of
 4 steps that you could go through and it wasn't always
 5 intuitive, particularly, I suppose, if you were a new
 6 subpostmaster. So I think it was there to look at
 7 seeing if it could be done any slicker through the
 8 system.

9 Q. If we just turn the page, if we can, to the top of the
 10 next page, please. It says:
 11 "This is a lengthy process, and unnecessarily runs
 12 the report twice. It also increases the potential for
 13 the clerk to enter an amount which does not match the
 14 report total amount."
 15 So is what this is saying is that the process
 16 increased the risk of discrepancy caused by user error?

17 A. Yes, it could. Because anywhere that you could just put
 18 a number in yourself, there's always the chance that
 19 you're going to hit a wrong key or, you know, something
 20 else could go wrong.

21 Q. If we go down slightly, we see there are some suggested
 22 improvements. Do you recall if those were brought in?

23 A. I can't, actually, no. I know that we did some more
 24 work on that, on the cheque rem out process, but I can't
 25 remember honestly whether improvements did actually come

18

1 are outstanding."
 2 If we can turn the page, the suggested improvement
 3 in this case is that:
 4 "This report is already available, and so this
 5 improvement is considered to already be present."
 6 It goes on to discuss revisiting communications on
 7 this.
 8 At this stage, were you aware of any subpostmasters
 9 who were calling for more access to, say, audit data or
 10 transaction data, used by the Horizon IT System?

11 A. To answer that question I'd probably have to say that,
 12 yes, there was always a desire that I'd found from the
 13 subpostmasters that I spoke to, that they had improved
 14 ways of looking at the system themselves. So whether it
 15 was to do with transaction corrections. And I don't
 16 know -- when it says "is considered to be already
 17 present", I'm not disputing that.
 18 That opportunity must have -- may have been there,
 19 but then, clearly, in this case, what we needed to do
 20 was recommunicate that here's a report that you can get.
 21 A lot of subpostmasters would want as much information
 22 as possible, so would have been asking for -- you know,
 23 would be asking if they could get a report on X, Y and
 24 Z. So, yes.

25 Q. Do you know if that was ever a point of discussion with

20

1 Fujitsu as to whether that would be a possibility of
 2 allowing postmasters access to such data?
 3 **A.** It was, because I think I have been there when those
 4 conversations were had. As a result of this, and then
 5 also doing some work on what we ended up calling HORice,
 6 which was a tool to investigate certain transactions and
 7 reports and things, ultimately, the desire for HORice
 8 would have been for subpostmasters to have access to
 9 that type of reporting and, I think, at the time, not
 10 long before I left, these things were being discussed
 11 more often because we were hoping for new technology to
 12 be coming in or new systems to be coming in, so that we
 13 could get subpostmasters access to more information and
 14 it would be more -- more of a two-way thing.

15 Ultimately, what we wanted was for subpostmasters to
 16 be able to communicate with us online and I got the
 17 impression that that's what subpostmasters wanted to do
 18 as well, and once we'd got to that sort of state, we
 19 were hoping that we'd be able to share some of the
 20 things that we were starting to build ourselves.

21 **Q.** I was going to come to HORice later but it makes sense,
 22 since you've mentioned it now, to go there. HORice is
 23 H-O-R-I-C-E, and was that an acronym for something?

24 **A.** It was but I can't remember what it was, if that's the
 25 next question.

21

1 a certain length of time, and I think that's one of the
 2 things that we were wanting to change. I don't know
 3 that was directly within HORice. But it was, certainly
 4 HORice was asking for stuff to be available for a longer
 5 period of time, so that you did have something that you
 6 could go back and refer to.

7 **Q.** What length of time are we talking here?

8 **A.** I think HORice was only -- the transaction logs were
 9 only available in branch, I'm going to say, for a month.
 10 Whether that's right or not I don't know. If that's the
 11 case, I think we were asking for six months, and
 12 possibly even longer than that. Having said that,
 13 I think there was -- there was going to be a limit to
 14 what we could get because of the volume of transactions
 15 that went through the system. I don't know that
 16 whatever clouds these things all go to were going to be
 17 big enough to hold everything for that length of time.

18 **Q.** We spoke about transaction logs. Would HORice store
 19 things beyond that? So would it include actually just
 20 the data in a branch that Horizon used to generate
 21 branch accounts?

22 **A.** I don't know. I think what I would say here is that
 23 that information was there somewhere, the information
 24 that we were asking for in Post Office. So whether it
 25 was for the Finance Service Centre, whether it was

23

1 **Q.** In paragraph 5 of your statement, you say that you
 2 worked on building an enquiry system known as HORice
 3 which was to build new reports to try to improve the way
 4 information could be obtained from the system to handle
 5 enquiries. Presumably the system there is Horizon?

6 **A.** Yes.

7 **Q.** Do you recall when HORice was introduced?

8 **A.** No. I can't. I can't put a date on it.

9 **Q.** In broad terms, would it have been earlier or later
 10 than, say, 2013?

11 **A.** Later, I think.

12 **Q.** What information was available or stored in HORice?

13 **A.** It was all transactional data and report data but it
 14 was -- what we were trying to do was get reports for
 15 things that we hadn't already had, and I can't
 16 remember -- I can't even tell you what an example would
 17 be of one. Just so that if there was a discrepancy or
 18 you needed to look for something or you needed to find
 19 something more quickly, then you could get a report from
 20 this new HORice system that we'd got.

21 **Q.** So would that include the transaction logs for
 22 a particular branch?

23 **A.** Well, you could get transaction logs anyway, so
 24 subpostmasters did have access to printing off
 25 transaction logs, if I remember correctly. But only for

22

1 something that was going to help subpostmasters
 2 themselves, whether it was the security team or whoever
 3 that was suggesting the types of reports that we were
 4 asking to be implemented in HORice, that information was
 5 clearly there, otherwise Fujitsu would have said, "We
 6 can't do that because we haven't got that type of
 7 information stored".

8 So we were asking for stuff that was there, just
 9 either in a better format for a longer period of time or
 10 in a different way to allow us to look at our own
 11 system.

12 **Q.** For easier access?

13 **A.** Yes.

14 **Q.** Who was given permission to access HORice?

15 **A.** There were only -- I think at the time that I left,
 16 there were only about 18 licences, if it was that.
 17 There was a very small number of licences because
 18 I think it was still being trialed.

19 **Q.** What was the reason for not giving access for
 20 subpostmasters to the data relevant to their own branch
 21 through HORice?

22 **A.** I don't know. I know that we only had a very small
 23 number of licences at that time. Ultimately,
 24 discussions were ongoing with Fujitsu to either extend
 25 the number of licences or to progress the trial further,

24

1 but then it was going to be -- yeah, I think it was cost
 2 after that so it would be, you know, we'll have to start
 3 talking about money for additional licences and how many
 4 do you need, and ...
 5 **Q.** Moving on from HORice, we'll go to the Branch Support
 6 Programme which I believe you were involved with.
 7 **A.** Yes.
 8 **Q.** What was your role in that?
 9 **A.** I'd probably have been doing a number of jobs within the
 10 Branch Support Programme. I did use to facilitate the
 11 Branch User Forum. Um, I can't remember any specifics.
 12 I did an awful lot of stuff -- it was a lot about trying
 13 to work with the communication team, work with different
 14 parts of the business to try to get, you know,
 15 improvements to what we were doing and how we were
 16 communicating, so that it was easier for subpostmasters.
 17 Just working throughout the business.
 18 **Q.** Let's take it in stages. Do you remember when this
 19 programme started?
 20 **A.** I can't remember exactly the date that it started, and
 21 because the programmes tended to change names, we did
 22 like to have a change of name every now and then and
 23 I can't remember which programme ran into which one now,
 24 so sorry.
 25 **Q.** If I suggested around 2013 or '14, would that ring true?

25

1 **A.** I'm aware of it, yes.
 2 **Q.** Were you involved in it?
 3 **A.** No.
 4 **Q.** Was there any link between the Branch Support Programme
 5 and either Second Sight or that Mediation Scheme?
 6 **A.** The link would be -- well, people? I don't know.
 7 I don't know whether there was any direct link between
 8 the people that worked in the Branch Support Programme
 9 and the Mediation Scheme. There would -- I knew,
 10 certainly, the people that worked in the Mediation
 11 Scheme. Whether or not they were all part of the Branch
 12 Support Programme at the same time or we were all under
 13 this same umbrella, I wouldn't be able to say from
 14 memory.
 15 **Q.** Do you know what triggered the Branch Support Programme
 16 to be implemented?
 17 **A.** I think it was probably the ongoing need to have some
 18 sort of, I would say, a culture change within Post
 19 Office. I think it was more or less along the lines
 20 that we weren't engaging with people as well as we
 21 could. It didn't feel like, at the time, that
 22 everybody's voice could be heard and the Branch Support
 23 Programme was probably grown out of that.
 24 **Q.** If we turn to page 3, please -- sorry, page 5. No, it
 25 was in between. Page 4, sorry.

27

1 **A.** I wouldn't be able to argue one way or another.
 2 **Q.** You refer to the Branch User Forum, I understand that is
 3 where subpostmasters were invited to provide feedback on
 4 the Horizon System and Post Office processes generally.
 5 **A.** Yeah.
 6 **Q.** How many subpostmasters were involved?
 7 **A.** In the Branch User Forum?
 8 **Q.** Yes.
 9 **A.** About six subpostmasters, I think.
 10 **Q.** How were they selected?
 11 **A.** Um, I think there was -- I think it was through the
 12 branch focus, the communications team. There was
 13 an article went out in that inviting people to apply and
 14 then, from the applications, somebody, I don't know who
 15 or how, selected the people that would first use -- you
 16 first come in on the Branch User Forum but I think it
 17 was an annual changeover, so the plan was that it was
 18 going to be changed annually and it was people came out
 19 and went in.
 20 So you weren't there indefinitely.
 21 **Q.** Please can we turn to POL00039215. So this is a Branch
 22 Support Programme PowerPoint presentation in May 2014.
 23 Are you aware of a mediation scheme for subpostmasters
 24 who were alleged to have shortfalls caused by like
 25 Horizon?

26

1 This refers to -- it says one of the issues of the
 2 report, which is referring to the interim report of
 3 Second Sight -- it says the following:
 4 "Lack of timely, accurate and complete information
 5 provided to subpostmasters to support them in resolving
 6 issues.
 7 "Lack of centralised data or files specific to each
 8 branch which hinders a quality investigation from taking
 9 place."
 10 At the bottom we see:
 11 "The investigation undertaken by the Programme
 12 highlighted/confirmed the following issues:
 13 "Inconsistent record keeping by internal teams or
 14 contact made with branches
 15 "Inconsistent quality of information retained by
 16 teams
 17 "Lack of consistent processes or workflows between
 18 teams within a process
 19 "Lack of timescales to resolve branch issue, coupled
 20 with lack of monitoring of issues
 21 "Inconsistent sense of 'ownership' of different
 22 issues."
 23 From this, is it fair to say that the Branch Support
 24 Programme wasn't engaging with subpostmasters on alleged
 25 bugs, errors and defects in the Horizon IT System?

28

1 A. I think I would say that it's probably fair to say that
 2 no, we weren't, because bugs, errors and defects were
 3 more IT issues. If we'd needed to do anything about
 4 that, and I'm not saying that we didn't because, you
 5 know, certainly things did occasionally crop up that
 6 were described to me as bugs, errors and defects, that
 7 would have been more in Fujitsu's domain.

8 Q. So outside of your responsibility?

9 A. Yes, in that it's not something we would have been able
 10 to fix but I suppose, as part of working on HORice and
 11 working on the Branch Support Programme, I think it's
 12 probably fair to say that, looking to the future, what
 13 we would want is a system, bug, error and defect free,
 14 of course, but that's probably not possible in IT world.
 15 So while it wasn't there on that list, if you like, it
 16 would be something in the back of our minds.

17 Q. But I suppose more in terms of the Branch User Forum,
 18 which this was involved with, the subpostmasters there,
 19 there was no discussion with subpostmasters of branch --
 20 sorry, bugs, errors and defects in the context of the
 21 Branch User Forum?

22 A. Not that I recall directly, no.

23 Q. Were you involved in any steps to be taken to address
 24 the issues that you identify in this slide?

25 A. Well, in that, yes, there were number of things that we

29

1 Q. Shall we look at the NBSC now on that point. If we can
 2 turn to POL00090223, which is an email that you sent to
 3 Angela van den Bogerd on 6 May 2015. You say you attach
 4 a one-pager, it's actually a two-sided one-pager, on the
 5 NBSC employee comments, which we will come to in
 6 a moment, it's feedback. Why were you providing
 7 feedback to Angela van den Bogerd at this stage?

8 A. I don't know. I think it was this one, all I'd done was
 9 pull the information together from my contact with NBSC,
 10 who I think that was the -- that was where the
 11 McKinsey's feedback had been involved or was referring
 12 to. Because I didn't ever see the McKinsey's report
 13 myself, I'd just heard about it. So I'm guessing, from
 14 this, that that all I'd done was pull something together
 15 and give it to Angela as a two-pager on something that
 16 she'd asked for.

17 Q. Do you recall why she asked for it?

18 A. I can't, no.

19 Q. Can we go to the next page, please. We have some
 20 comments here and the first one -- it says "81 comments
 21 in total broken down as follows":
 22 "Communication -- 14 comments. Main theme relates
 23 to timely and better communications and also knowledge
 24 of what to do when products are launched or when things
 25 change or go wrong. This theme was raised with Branch

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1 tried to do within the Branch Support Programme, through
 2 either NBSC and Branch Support Team, if they were still
 3 around at the time, that would help engage more with
 4 subpostmasters. So we did things like we could get
 5 reports from NBSC on the number of people that called in
 6 to NBSC, what the issues were they called in on. So
 7 like which branches called in most often. Which
 8 branches didn't call in at all.

9 And during the time that the Branch Support
 10 Programme ran, and afterwards, we used to make calls to
 11 branches from those lists to make sure that, you know,
 12 was there anything that we could do to help. So if it
 13 was somebody that was ringing in a lot of the time, it
 14 was to try to make sure that, if they were new, new
 15 subpostmasters, was there any additional help they
 16 needed? Was there any more support that we could get
 17 them, whether that be through a bit more regular contact
 18 from an NBSC adviser or, you know, ultimately we could
 19 put a request through perhaps to get a bit more
 20 training.

21 I think we had calls to branches that had never rung
 22 in to us at all. So that -- because clearly, you know,
 23 they were still a valuable part of the Post Office, as
 24 far as we were concerned but for years they hadn't been
 25 engaged with, if you like. So they were rung.

30

1 Support Programme and is a theme raised by BUF too."
 2 "BUF" being?

3 A. Branch User Forum, yes.

4 Q. So is it fair to say that the feedback you've pulled
 5 together here was criticising the level of information
 6 and communication to the NBSC relating to both changes
 7 to Horizon and problems with Horizon?

8 A. Not necessarily with Horizon, there, no. In fact,
 9 I would say probably not with Horizon. It was to do
 10 with communications that went out to branches, in the
 11 *Branch Focus*, I think it was called *Branch Focus*,
 12 communication that went out weekly.

13 NBSC should always have seen -- well, I'm saying
 14 "always", there may be things that they didn't need to
 15 see but they should have always had the opportunity to
 16 see and comment on the communications that went out to
 17 branch before it went out, purely and simply because
 18 they were the ones that were going to get the enquiries
 19 if the communication wasn't clear. So they could then,
 20 you know, act as the go-between between the
 21 Communications Team and subpostmasters, to some extent.

22 And I think what, from memory, what that would be,
 23 would be the advisers in NBSC would be saying, "We're
 24 either not getting them or we're not getting them quick
 25 enough to do something about it" or, you know, maybe

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1 "We've fed back on this but nobody has picked anything
2 up or not replied to say why they haven't done anything
3 with our feedback".
4 So I think that would be more to do with products
5 and transactions than anything to do with Horizon
6 itself, with the system.
7 **Q.** And the final sentence says, "AHT"; do you remember what
8 that stands for?
9 **A.** Average handling time.
10 **Q.** So is that the time in which it takes for a member of
11 the team to resolve a call?
12 **A.** Yes.
13 **Q.** So:
14 "AHT was also raised as an issue by advisers in that
15 they feel they are pressurised to achieve AHT above
16 quality of response to branch."
17 Do you recall that being a concern at the NBSC?
18 **A.** I recall it being mentioned but I don't know that that's
19 a fair comment because I don't know the context that it
20 was given in.
21 **Q.** Do you know what the average handle time aim was?
22 **A.** No. I'm saying no, I will have heard it in the past,
23 but I can't remember what it was, and I would imagine
24 that over years, it probably changed anyway, you know,
25 as average handling time it would be if things were

33

1 **Q.** Turning to a different topic now, at page 4 of your
2 statement onwards you referring to the Horizon weekly
3 call. Do you remember when this was set up?
4 **A.** No.
5 **Q.** Do you know why it was set up?
6 **A.** Yes, again, I think that was the one that was set up so
7 that we weren't duplicating anything that was going on
8 with the Second Sight branch of --
9 **Q.** What do you mean "duplicating"?
10 **A.** Well, if the branch was in Second Sight or later on,
11 whatever, it went into mediation -- I can't remember
12 exactly what happened when -- it was to make sure that
13 we weren't then trying to do something with that branch
14 that was already going on somewhere else, or if there
15 was an ongoing Inquiry, say within the security team or
16 within the Finance Service Centre, that, you know, they
17 were already aware of, that we weren't then duplicating
18 something that somebody else was already looking into.
19 **Q.** Who attended those calls?
20 **A.** Horizon weekly call, it would be representatives from
21 Legal, Network, or whatever we were called then, Finance
22 Service Centre, Fujitsu, perhaps Fujitsu, ATOS, by that
23 point as well, and Security, have I mentioned them?
24 **Q.** Yes.
25 **A.** I can't remember off the top of my head whether there

35

1 improved in NBSC, that if things were quicker for the
2 advisers to get to, then I would imagine that over the
3 years that average handling time would have changed.
4 **Q.** So in your position, we see that the BUF and the Branch
5 Support Programme looked at the NBSC. Did you have any
6 concerns during that period as to the quality of the
7 advice that the NBSC was able to give to subpostmasters?
8 **A.** No.
9 **Q.** Why not?
10 **A.** Because the advice that the NBSC gave to subpostmasters
11 was always given to them so they had a massive Knowledge
12 Base that they could go to, to look at. If -- the only
13 thing I would say would have been of concern would have
14 been if there were more than one way that they could get
15 to the answer, for something. So say somebody rang up
16 about Lottery for the sake of picking -- and the adviser
17 hadn't understood exactly what the Lottery question was
18 and had gone into the wrong bit of the Knowledge Base,
19 then that would have been the only thing that would have
20 been a concern. Not the actual -- it would be that
21 they'd given the wrong bit of advice for the wrong
22 transaction -- for the right transaction, rather than
23 they had any concern about the advice they were given.
24 What was on the Knowledge Base was right, providing
25 that the advisers went through it to the right bit.

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1 would be anybody else but it was representatives from
2 different parts of Post Office, Fujitsu or ATOS and
3 Legal.
4 **Q.** Would this call lead to -- or lead to action points to
5 be implemented in respect of how subpostmasters, queries
6 or discrepancies needed to be answered?
7 **A.** It could, I suppose, if something had cropped up that,
8 you know, say if it had cropped up and it was an action
9 point for me or whoever and somebody else could then
10 answer the question where I couldn't, then, yes, it
11 would -- you know, it would be then used to go back and
12 answer that subpostmaster.
13 **MR STEVENS:** Sir, that's probably a good time to take
14 a break.
15 **SIR WYN WILLIAMS:** Certainly. 11.10. Thank you.
16 (10.59 am)
17 (A short break)
18 (11.10 am)
19 **MR STEVENS:** Thank you, sir. Please could I bring up
20 POL00002396 and go to page 2. We have an email from
21 Andrew Morley to -- well, it's to the Branch Support
22 Team but we see you pick up the email above,
23 11 September 2014.
24 It refers to receiving a call from someone at the
25 branch, and it says:

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1 "He has seen the BBC report concerning the system
2 issues and is claiming that his system is corrupt. He
3 wants all the money pack from previous discrepancies
4 which he has put in so he could balance. He has been to
5 Horizon/ATOS who have checked everything and can find no
6 system issues but he is adamant it's a system issue."

7 Above you say:

8 "This will be picked up by the Contract Adviser not
9 by an intervention visit."

10 Stopping there, can I just ask why that was
11 a contract adviser issue rather than an intervention at
12 this point?

- 13 **A.** I'm guessing that once we'd looked at the branch file on
14 the electronic filing cabinet, that it was something
15 that the contract adviser was already in discussion with
16 this particular subpostmaster about. So again, to avoid
17 duplicating work or avoid NBSC picking up something they
18 didn't need to, it would be -- this was correct for it
19 to go to the contract adviser, the most recent request.
- 20 **Q.** Do you recall seeing the BBC report that's referred to
21 here?
- 22 **A.** I didn't watch it, no. I remember that it was on but
23 I don't think I actually watched it.
- 24 **Q.** Do you recall any discussion in the Post Office at that
25 point on what that BBC report contained?

37

- 1 Do you recall receiving a communication like this?
- 2 **A.** Yes.
- 3 **Q.** Was this consistent with the type of messaging or
4 assurances you said you were receiving?
- 5 **A.** Yes.
- 6 **Q.** I think your evidence already is you were assured by
7 these sorts of communications?
- 8 **A.** I had absolutely no reason to doubt that, you know, we
9 were doing all the necessary due diligence ourselves and
10 that what we were being told was the case.
- 11 **Q.** Do you think that was the same for your colleagues --
- 12 **A.** Yeah.
- 13 **Q.** -- that they were similarly assured by that?
- 14 **A.** Yes.
- 15 **Q.** If you hadn't received these assurances, do you think
16 that would have changed the way you approached
17 subpostmasters, such as the one we went to before, who
18 were saying, "I've got a problem, I think it's a system
19 issue, look at this BBC report"?
- 20 **A.** Um, I think I would have probably thought a little bit
21 more about it but I still think that, personally, I was
22 quite assured anyway, without being given the
23 reassurance from the Post Office, if you like, because
24 it was a general message that went out. I was quite
25 trustful of the Horizon System anyway, so I don't know,

39

- 1 **A.** Um, well, yes. It wouldn't be fair to say that I didn't
2 hear anything, but, yes, people were -- there was a sort
3 of general what's going on here, you know. Where's this
4 coming from. Could any of this be right? But I think
5 we were all still really assured that there was no issue
6 that we need to be worried about.
- 7 **Q.** Could we turn to WITN06380101, the email at the bottom,
8 please. It says from Communications Team to
9 Communications Team, and it references "Media coverage
10 on Post Office IT system" on the same day as the
11 previous email we went to:
- 12 "You may be aware of some media coverage about the
13 Post Office's Horizon System, relating to the contents
14 of some confidential documents, and this may prompt
15 questions from postmasters you speak to.
- 16 "We are challenging the reporting of this matter as
17 it implies we acknowledge there are systemic faults with
18 Horizon. This absolutely not the case.
- 19 "Although we will not comment on the contents of any
20 confidential documents, after two years of investigation
21 it remains the case that there is absolutely no evidence
22 of any systemic issues with the computer system which is
23 used by over 78,000 people across our 11,500 branches
24 and which successfully processes over 6 million
25 transactions every day."

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- 1 yes, I would never have doubted that anyone had concerns
2 and I would have done everything I could to alleviate
3 them, but I certainly wouldn't have been saying "Yes,
4 I think there's something in what you're saying here",
5 because I had no evidence to suggest that there was any.
- 6 **Q.** If we go to a different document, please. It's
7 FUJ00120885. Can we turn to page 3 of that document,
8 please. Thank you. The email at the bottom is from Ian
9 Humphries. Do you recall who he was?
- 10 **A.** Yes.
- 11 **Q.** Who was he?
- 12 **A.** He used to work in Service Management, in Post Office
13 Limited, and I think he went across to ATOS.
- 14 **Q.** He refers to:
- 15 "The Meanwood branch has reported an issue with
16 a Health Lottery transaction that is now preventing the
17 terminal from connecting.
- 18 "Fujitsu is requesting for an authorisation for them
19 to remove the Health Lottery [transaction, and then the
20 number] which is preventing successful recovery on
21 counter node 04."
- 22 At this point, what's your understanding of the
23 problem facing this branch?
- 24 **A.** At this point, if I'd just been reading this, I'd have
25 been wondering exactly what they were talking about.

40

1 For me, there's not enough detail there to tell us
2 exactly what's gone wrong. It might be quite clear to
3 the person looking at it from the other end, I don't
4 know but I don't really -- I didn't really understand,
5 then, what the implications of this was, so I didn't
6 know whether it was having any effect on the branch
7 account, I think, initially.

8 I wouldn't have known whether or not the
9 subpostmaster knew anything about it, unless it was one
10 of the ones that had been raised to me by the Branch
11 Support Team, in that they'd got a request through, as
12 well.

13 **Q.** We see just towards the bottom it says:

14 "Authorisation is required urgently to enable the
15 postmaster to get the node back online."

16 So, in effect, is the Branch Support Team being
17 asked to authorise a deletion of a transaction from the
18 branch accounts?

19 **A.** They'd been asked to go to an area manager, who I don't
20 know what they would mean by an "area manager" at that
21 point, but they'd clearly been asked to -- or somebody
22 has been asked to get something authorised to get
23 this -- to get the node back online. That's the,
24 I presume, the counter terminal. So I'm guessing that
25 this would mean that the terminal, that counter

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1 So you say:

2 "... and who the escalation point(s) were? This
3 type of request has not formerly been managed by the
4 Branch Support Team and if it needs to be embedded into
5 a ..."

6 Is that "business as usual"?

7 **A.** Business as usual, yes.

8 **Q.** "... environment I would prefer to understand the
9 background to the process, where it should sit (based on
10 earlier cases) so that enquiries are dealt with
11 consistently and are fully documented for audit
12 purposes.

13 "Please provide me with some understanding of how
14 often this happens, root causes, potential solutions,
15 impact to branch/customer and whether there's any
16 financial implication."

17 Are you here asking about the process generally for
18 whenever Fujitsu sought to make amendments to branch
19 accounts?

20 **A.** Yes. In -- well, I presume that this was -- that this
21 issue itself, in this case, hadn't just come out of the
22 blue, that it wasn't the first time that it had ever
23 happened. And, even if it was the first time it had
24 ever happened, then surely somebody somewhere would have
25 been able to give me some background and say, "Well, you

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1 position, they wouldn't be able to use, because of
2 whatever the problem was.

3 **Q.** If we look at your response at page 2, please. It's at
4 the bottom. You ask for someone to provide you:

5 "... with the process that was followed for this
6 type of enquiry prior to Service Integration ..."

7 **A.** Right.

8 **Q.** What was "service integration" here?

9 **A.** This must have been when Service Management transferred
10 over their work to ATOS. So, for example, Ian and
11 Sharon, there's another name I remember, Rebecca Barker.
12 They all worked in Service Management but I think they
13 all went across to ATOS, when service integration came
14 in.

15 **Q.** So those people had dealt with the authorisation before
16 that -- they were then TUPE transferred out and is your
17 query now who deals with the authorisation?

18 **A.** Yes, but whether or not they'd actually dealt with
19 authorisation before they TUPE'd across, I don't know.
20 I was just hoping that they would have a process
21 somewhere that would tell me where that sat, because if
22 I'm right I don't believe that NBSC or Branch Support
23 Team or anybody had a process for sorting out how we
24 will get this back online.

25 **Q.** If we go to the next page, please, just to finish off.

42

1 know, we can't give you any background on it other than
2 this specific case". They would have been able to,
3 I presume, give me some sort of root cause, in their
4 words I've got used to using, and somebody somewhere
5 would have been able to give us an idea of whether or
6 not there was any impact to the branch as a customer.
7 Because it could be that -- if it was a bill -- did they
8 say Health Lottery?

9 **Q.** Health Lottery, yes.

10 **A.** In that case, if they'd got that Health Lottery ticket,
11 or whatever it was, was it a prize from the Health
12 Lottery? I don't know. So were they still out of
13 pocket or was the branch being affected, other than not
14 being able to use that counter terminal, really.

15 **Q.** Can we go to page 1, please, of this document.

16 **SIR WYN WILLIAMS:** Just I think there's probably a break in
17 the transcription service.

18 **MR STEVENS:** Sorry, sir.

19 **SIR WYN WILLIAMS:** As I say, provided the transcriber is
20 transcribing, I think in the room we'll just have to put
21 up with it.

22 **MR STEVENS:** Yes, I am told it's fine.

23 **SIR WYN WILLIAMS:** Yes.

24 **MR STEVENS:** Thank you.

25 Here's an email you sent to Ian Humphries, the

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1 second paragraph. You say:

2 "I'm therefore happy to authorise this session to be
3 deleted so that the kit at the branch can return to BAU
4 state."

5 Earlier when you saw the information you had, the
6 transaction detail and what was being required, it's
7 fair to say that, in terms of the technical aspects of
8 it, you didn't have a good grasp of that; is that fair?

9 **A.** Yes.

10 **Q.** Did you seek any IT input into whether that was
11 an appropriate decision -- appropriate action to take?

12 **A.** The IT input then would have come from ATOS. So from
13 Ian or whoever was working on that side of it now in
14 ATOS. That's where it would have come from and it would
15 have been up to them to go to Fujitsu to get anything
16 more that was needed. We didn't have, by that point,
17 for day-to-day enquiries, we didn't have a direct route
18 into Fujitsu, so it was all done through ATOS.

19 **Q.** Were you responsible for authorising these types of
20 transactions in the future?

21 **A.** No, I think at that point, once we'd established that
22 there was no impact to the branch financially or to the
23 customer, that the customer was okay with everything,
24 because there was no clear process and nobody was coming
25 up with one, I think what we did was say, "Right, we'll

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1 process but, after this, something, some procedure was
2 put into place but you weren't involved with it?

3 **A.** Yes, that's assuming that there had been cases of this
4 beforehand and I still don't know that I ever got to the
5 bottom of how many of these there was.

6 **Q.** Right. Please can we bring up FUJ00085864, page 7 of
7 that document, please. This is an email from Katie
8 Austin to Kendra Dickinson and Ibrahim Kizildag, and
9 this refers to what's now known as the Dalmellington bug
10 or the outreach bug. Is this a fair summary that
11 an outreach service was where there was a core Post
12 Office branch, known as a core branch and there may be
13 a separate sight, an outreach site, which would
14 essentially operate as a satellite for that core post
15 office?

16 **A.** Yes, it may have more than one satellite, if you like,
17 but, yes, that's essentially it.

18 **Q.** In order to operate those satellite sites, the core
19 branch would rem out cash and stock to the outreach
20 site?

21 **A.** Yes.

22 **Q.** In this case, what's been described here is a problem
23 where someone would, in this case, rem out £8,000 so
24 that would come out of the core site, so scan that out,
25 go to scan it into the outreach site, but that was

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1 authorise it".

2 Because it was important for the branch to get that
3 counter position back up and running, (1) so that they
4 had somewhere to serve customers from, if it was --
5 heavens forbid, it wasn't just a one-position branch,
6 I don't think. But if it was a two-position branch and
7 they had busy periods, they would clearly need to have
8 that second position up and running. So if that wasn't
9 up and running correctly, it needed to be, plus they
10 would have to reach a point where they would need to
11 roll that position over properly, I think.

12 So they would need to be back online to do that, so
13 that information didn't get lost or fall into the wrong
14 trading period or something like that, whatever could go
15 wrong. So I think what we've done is say, "Right, we'll
16 do this so we can follow the whole thing through and
17 then try and get a BAU process for this, so that we know
18 in future where it needs to go to get authorised".

19 **Q.** Right. That BAU process didn't result in you being the
20 authoriser?

21 **A.** No.

22 **Q.** So is your evidence then that until the ATOS TUPE
23 transfer, there was some sort of process in place for
24 authorising these types of remote access requests.
25 There was then a period of time when there was no BAU

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1 duplicated -- sorry, it was duplicated several times, so
2 that the outreach site was showing more cash than
3 actually what went across. So in this case, £24,000
4 rather than £8,000.

5 **A.** Yes.

6 **Q.** Now, if we go up, please -- sorry, leave it there for
7 the second, sorry.

8 We see at the bottom of that explanation that:

9 "The incident was passed to Fujitsu who have advised
10 that in order to resolve the issue, the branch/NBSC must
11 'complete a rem out for the excess to correct the cash
12 holding' which Fujitsu are unable to do. The NBSC has
13 subsequently advised that they cannot assist as this is
14 an IT issue however Fujitsu are also advising that they
15 cannot assist. As a result, the issue has been passed
16 back and forward for over a week."

17 Obviously, this email is 20 October, the issue was
18 raised on 8 October, some 12 days earlier. Do you
19 consider it's satisfactory for this issue to be bounced
20 between the two teams for 12 days?

21 **A.** No.

22 **Q.** Was this is an issue that regularly happened where
23 subpostmasters' complaints such as this fell between the
24 cracks?

25 **A.** I wouldn't say regularly, no, and I don't know, I think

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1 this was possibly the first example of this kind of
 2 issue that I'd seen. So whether or not, if there'd been
 3 any previous ones, at that point I would be wondering
 4 what had happened to them beforehand, how, you know,
 5 what the cause was, how quickly had they been fixed.
 6 What -- you know, what the process was to get it sorted
 7 out. 12 days, no, because if I'd been the subpostmaster
 8 and I was looking at a discrepancy of £24,000, then I'd
 9 have been sweating, for 12 days, when really, if it's
 10 a known problem or we can identify what the problem is,
 11 it should be easy enough to fix.

12 **Q.** Is your evidence that this is the first system bug that
 13 you were aware of?

14 **A.** I don't know what you mean by system bug.

15 **Q.** Or a bug in the software system -- a bug in the
 16 software?

17 **A.** Well, possibly it was, yes. I mean, I don't know
 18 whether -- I don't know what the difference is between
 19 bugs, glitches and errors, for one. Things that went
 20 wrong -- I suppose, when things went wrong, if
 21 a communication broke down -- I'd seen those before
 22 where they would end up being a discrepancy, but they
 23 were always -- you could correct them with fall back and
 24 recovery processes. So there would be interruptions to
 25 the Horizon System, like there is with your phone or

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1 to their system and he is not happy about this message
 2 and PM also said he watched Panorama programme and he
 3 wants us to escalate this issue. I escalated this issue
 4 to Service Desk, if possible can field teams visit this
 5 branch regarding this also."

6 Your response is at 4:

7 "The outcome of the call to ATOS is needed before
 8 any further action is taken. It might explain what's
 9 happened. Is there a ref number?

10 There's a reference to HORice:

11 "Has HORice user data been checked?

12 "For info, this may be raised to you if you're still
 13 in contact with Fleckney.

14 "In brief though the recent comms statements should
 15 be used and I've no doubt there will be an explanation
 16 here that's nothing to do with Horizon."

17 So, again, on what basis did you have no doubt that
 18 there was a Horizon issue here?

19 **A.** Probably because I've ever, ever come across one before
 20 and, at that point, I think we could get -- you could
 21 get reports on who was logged on to Horizon through
 22 HORice, I don't know that we could actually get them
 23 anyway. I think there was a user report that you could
 24 get off your system and I probably, wrongly, without,
 25 you know, knowing all the information and looking at

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1 anything else, if you like. Except with the Horizon
 2 System, obviously, if that was partway through
 3 transaction, then it might freeze something and it would
 4 then have to be corrected.

5 So I'd seen that type of thing and heard of that
 6 type of thing happening before but this was the first
 7 time that I'd seen it actually cause a shortage like
 8 that where they hadn't really -- there was nothing they
 9 could do about it, even under fallback and recovery.

10 **Q.** We can take that document down and move on to another
 11 issue in September 2015, so slightly before. Can we
 12 bring up POL00002578 and page 4, please. Just for
 13 context, at the bottom is the email from Ibrahim
 14 Kizildag to the Branch Support Team about Fleckney Post
 15 Office, to which we see above you respond?

16 **A.** Right.

17 **Q.** Go down to that email, from Ibrahim Kizildag, please:

18 "I took a manager call from Fleckney Post Office,
 19 branch code is [gives a branch code]. This branch had
 20 a Data Centre link error message yesterday evening and
 21 PM couldn't log on to Horizon System this morning. PM
 22 said he had a message stated that they are logged on to
 23 another SU [stock unit] they only have 2 positions and
 24 nobody is logged in. The PM feels that this is
 25 a security issue and he said someone could have log on

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1 what the postmaster could see myself, assumed that they
 2 hadn't checked to see who was logged on, where and when.

3 So that's about as much as I can say on that.

4 **Q.** In respect of the comms statement, in relation to the
 5 Panorama documentary, please could we bring up
 6 WITN06380102.

7 If we could go to the bottom, please. Just up so we
 8 can see the date on the email. So it's Communications
 9 Team 14 August 2015, sorry this is below that. From
 10 Communications Team, 14 August 2015, to Communications
 11 Team, "in the loop -- the latest on Panorama".

12 Go down, it says:

13 "Hello

14 "I wanted to send a short update on the plans by the
 15 BBC's Panorama to broadcast a programme about the Post
 16 Office and its Horizon System on Monday.

17 "We have spent a great deal of the week dealing with
 18 this issue, and making our position clear to the BBC at
 19 very senior levels. We do expect, however, that the
 20 programme will include a number of unsubstantiated
 21 allegations. We have decided against being interviewed
 22 as part of the programme and have instead issued
 23 a robust statement. This was a very carefully
 24 considered decision but the programme wanted us to speak
 25 publicly about individual cases and we are not prepared

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1 to break the confidentiality commitments we have given
2 about these. Whilst it is difficult to take this
3 position in the face of untrue claims being made in
4 public, we believe it is the right one."

5 The next paragraph down says:

6 "On Monday we will be sending out a note to all Post
7 Office colleagues updating them on the programme. In
8 the meantime, our core points are below. I would
9 welcome your help in ensuring that our key messages are
10 cascaded to colleagues, particularly those who may get
11 questions from customers or postmasters ..."

12 The key points:

13 "Extremely serious, unsubstantiated allegations
14 about the Post Office and the Horizon System have
15 continued to be repeated over the past few years by
16 a small number of mainly former postmasters."

17 It goes on below to say:

18 "The clear evidence we have in these cases does not
19 support the allegations being made.

20 "We committed to confidentiality to people who put
21 grievances to us, so we cannot share details about
22 individual cases.

23 "What we can say is that we do not prosecute people
24 for making innocent mistakes and never have ...

25 "We have demonstrated that Horizon works as it

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1 within that document it's page 33 on Relativity
2 pagination. This time please, very top of the page,
3 highlighting "Losses" at paragraph 12, if you could
4 expand that and highlight in yellow I would be very
5 grateful. Thank you very much.

6 So, generally speaking, this is the contractual term
7 that was in place for subpostmasters and mistresses
8 throughout the time of the operation of the Horizon
9 System. It says:

10 "The Subpostmaster is responsible for all losses
11 caused through his own negligence, carelessness or error
12 ..."

13 That's the relevant bit you were asked about
14 earlier.

15 Now, just help us understand a little bit more about
16 what you thought that meant, now meant in terms of who
17 needed to prove negligence, carelessness or error. So
18 there were perhaps two choices. Did the Post Office
19 need to prove that the subpostmaster had been negligent,
20 careless or in error, or was that for the postmaster or
21 mistress to prove that they hadn't?

22 **A.** Probably a little bit of both. If -- from my
23 interpretation. Because there was a lot of procedures
24 that you were expected to follow from a security point
25 of view, and so there would be, if you were interviewing

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1 should. It has been shown to be robust and effective in
2 dealing with six million transactions a day, with some
3 78,000 people using it, and it is regularly audited."

4 I'll leave it there. The rest is in evidence. Was
5 this the messaging you were referring to in that email?

6 **A.** It will have been, yes.

7 **Q.** You were relying on that in respect of how you dealt
8 with enquiries that came into you from subpostmasters?

9 **A.** We would. Everybody would have, not just myself. Yes.

10 **MR STEVENS:** Thank you, Ms Allaker. I don't have any
11 further questions for now. Some of the Core
12 Participants may do. Before I do, is there anything
13 else you'd like to say to the Inquiry?

14 **A.** No, there's not.

15 **MR STEVENS:** I think Mr Stein has a question.

16 **Questioned by MR STEIN**

17 **MR STEIN:** Ms Allaker, when Mr Stevens started asking you
18 questions today, he was asking you about your knowledge
19 of the subpostmasters' contract. I'm going to ask you
20 a question about that. My name is Sam Stein -- another
21 Sam -- and I represent a large number of subpostmasters
22 and mistresses.

23 Okay, Mr Stevens referred you to a document which
24 has a Relativity reference of POL00000254. If it is
25 possible, Lawrence, for that to go on the screen, and

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1 somebody, for example, to say, you know, how did this
2 happen, how -- what are your general procedures in
3 branch? You would try and make sure that what they were
4 doing was following all the necessary security
5 guidelines, so that access to stock and cash was
6 restricted, that things were locked away appropriately.

7 So it was up to us to make sure they knew what they
8 were doing and it was up to them to say, "Yes, that's
9 what we have done". So I think, in a way, to answer
10 your question, a little bit of both.

11 **Q.** What if the situation was that the subpostmaster
12 couldn't explain, in other words had no idea where the
13 shortfall came from? Now in that situation, they're not
14 saying that they are careless, they're not saying
15 they're negligent, they're not saying they're in error,
16 they're just saying, "I don't know". In that situation,
17 who was it to prove that they had been careless,
18 negligent or in error?

19 **A.** In that case, in all honesty, I don't think you can
20 prove it one way or another. Because if you've made
21 a mistake, if you've -- if something has happened
22 accidentally or even if someone has taken the money and
23 you don't know anything about it, then in all honesty,
24 you can't prove anything one way or the other.

25 So if you'd dropped the money into a postbag or the

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1 bin and it had been emptied and gone missing, you don't
2 know that it's carelessness, negligence or what's the
3 last one -- error. So I don't think you can prove it
4 one way or another.

5 **Q.** In a situation whereby the subpostmaster is saying,
6 "Ms Allaker, I really don't know what's happened here",
7 what would be the position from the Post Office? That
8 would still be down to the postmaster or mistress to
9 make good that loss?

10 **A.** Yes. Not necessarily all in one lump sum, depending on
11 circumstances, but yes.

12 **Q.** That was the position that was known and operated
13 throughout the team that you worked in and, indeed, you
14 worked within?

15 **A.** Yes.

16 **MR STEIN:** Excuse me one moment.

17 Sir, thank you.

18 **SIR WYN WILLIAMS:** Anyone else?

19 Thank you very much for making your witness
20 statement and for coming to give evidence to the
21 Inquiry. I'm grateful to you.

22 **A.** Thank you.

23 **SIR WYN WILLIAMS:** So no doubt we'll have a short break
24 while we call another witness, so to speak.

25 **MR STEVENS:** I think we need 20 minutes, sir, if that's

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1 the bottom?

2 **A.** Yes, it is.

3 **Q.** Is that statement true to the best of your knowledge and
4 belief?

5 **A.** It is.

6 **Q.** Thank you very much. That witness statement is going to
7 go into evidence and it will be published by the
8 Inquiry. For the purpose of the transcript it's
9 WITN06160100 and the questions I'm going to ask you
10 today are going to be supplementary to that and we will
11 expand on a few areas. I am going to start, though, on
12 your background, which you have detailed in the
13 statement. I just -- you've been in quite a large
14 number of different areas, a number of different roles,
15 so I'm going to focus on the ones that are relevant for
16 today's purpose.

17 **A.** Okay.

18 **Q.** You joined the Post Office in 2001 as part of a graduate
19 management trainee scheme; is that right?

20 **A.** It's correct, yes.

21 **Q.** During that scheme, you used Horizon, I think, when you
22 were seconded to Middlesbrough Post Office?

23 **A.** I did, yes.

24 **Q.** You subsequently held number of positions. I'm going to
25 start with 2006 to 2010, you were the head of network

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1 okay.

2 **SIR WYN WILLIAMS:** All right, fine. 12.05 pm.

3 **MR STEVENS:** Thank you, sir.

4 (11.46 am)

5

(A short break)

6 (12.06 pm)

7 **MR BLAKE:** Thank you, sir. Can we call Gayle Peacock,
8 please.

9

GAYLE PEACOCK (affirmed)

10

Questioned by MR BLAKE

11 **MR BLAKE:** Thank you very much. Can you give your full name
12 please?

13 **A.** Gayle Anne Peacock.

14 **Q.** Thank you, Ms Peacock. In front of you, you have two
15 bundles, I believe.

16 **A.** Yes.

17 **Q.** Behind one of them, tab A, you have your witness
18 statement. Can I ask you to turn to your witness
19 statement.

20 **A.** Yes.

21 **Q.** Is that statement in front of you dated 31 January of
22 this year?

23 **A.** It is, yes.

24 **Q.** Can I ask you to look at the final page, final
25 substantive page, at page 50. Is that your signature at

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1 co-ordination. Can you briefly tell us what that
2 involved?

3 **A.** So there was two aspects to the role, really. One was
4 around -- they'd set up the outlet intervention team in
5 Maidstone, so this was the escalation point for
6 subpostmaster queries, where they couldn't get the
7 answer from Network Business Support Centre, anything
8 that couldn't be answered by the helpline, we had to set
9 that team up to basically deal with those enquiries, so
10 there was that part of the team I managed.

11 I also managed a team of network co-ordination
12 managers and they interacted mostly with the heads of
13 area and their Retail Line managers to understand some
14 of the issues that branches were facing, whether that be
15 cash management, product and branch accounting, and
16 tried to sort of help postmasters, really.

17 **Q.** Then between 2011 and 2013, you were network conformance
18 standards and policy manager. Can you tell us briefly
19 what that involved?

20 **A.** Yes, so that was -- there was a branch standards booklet
21 published, I think, in 2009 and this was basically
22 running the team that would help branches understand how
23 to follow the correct procedures. So I had a team of
24 people that would make telephone interventions to
25 branches, and to talk them about the areas within the

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1 booklet. I also had a data team that would look at the
2 results of the different areas, plan the sort of support
3 roles, the intervention the telephone calls.

4 I had a mails support manager who worked for me,
5 I think, at the time and that was around managing some
6 elements of the Mails Distribution Agreement or some of
7 the complex issues that we had with Royal Mail to
8 resolve. Then I had a multiples service manager and
9 they were responsible for all the conformance elements
10 with the likes of McColls, Co-op, interfacing with those
11 partner groups, really, to drive performance in the
12 areas that we were focusing on with post offices.

13 **Q.** Thank you. 2013 to 2014, head of branch support
14 project. Briefly -- we'll go into it in more detail --
15 but can you tell us what that involved?

16 **A.** Yeah, so I was asked to lead the project on the back of
17 the Second Sight review and some of the issues that were
18 coming -- the thematic issues that were part of that
19 review, to really understand what we could do to help
20 postmasters, especially in the likes of training and
21 support, and what we could do differently. So it was
22 really about doing more of a deep dive into some of the
23 themes that were coming out of those spot reviews and
24 the individual cases, and then looking across the
25 business to say "Well, how could we improve things, what

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1 **A.** Um, I don't think so. I mean, I did a Retail Line
2 Manager role where it was, you know, I was looking after
3 a patch of branches myself, in my early part of my
4 career but I guess that's probably not really relevant
5 to the themes out of the Horizon Inquiry as such.

6 **Q.** We've heard earlier in this phase about the training
7 that was provided at rollout and it was only a day and
8 a half.

9 **A.** Yes.

10 **Q.** By 2006, in broad terms, what kind of a training package
11 was offered to subpostmasters?

12 **A.** It was a colleague in network services, and I think it
13 was split at the time as Andy Bayfield and Julia Marwood
14 who managed the team. So I think, in terms of the broad
15 level detail, I think at 2006, I think it was a week's
16 classroom course that they were offered, a transfer
17 balance, which was obviously the incoming and the
18 outgoing postmaster, and then, depending on the size of
19 the branch there could be like five days face-to-face
20 support in branch. And then I think there was
21 a follow-up balance so that the next time the branch
22 needed to do their cash account or branch trading they
23 would attend, and then I think I believe there was what
24 we called post-transfer visits or -- I think it was one,
25 three and six months. I think that was what was on

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1 would we need to put in place". That kind of thing,
2 really.

3 **Q.** Finally, between 2015 and 2018 you were head of branch
4 and customer support.

5 **A.** Yeah.

6 **Q.** Now, that was what previously we know as the NBSC; is
7 that right?

8 **A.** It was, yes. Yes, that's correct.

9 **Q.** You were involved in a number of matters in that role
10 but one of them included managing executive
11 correspondence?

12 **A.** Yes, so that was anybody, it was Members of Parliament,
13 public, postmasters, who would write to the Chief Exec
14 or any member of the Post Office executive team. So it
15 was that team who would get those complaints and manage
16 them, basically, in the business.

17 **Q.** It sounds as though, in broad terms, a lot of your
18 career has focused on support to subpostmasters, whether
19 it be providing that directly or reviewing the support
20 that's provided to subpostmasters; is that a fair
21 description?

22 **A.** Yes, that's correct, yes.

23 **Q.** Are there any other roles that you held that I have to
24 failed to mention that you think are relevant to this
25 Inquiry?

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1 offer at the time.

2 **Q.** Thank you. So the amount of training certainly had
3 increased since rollout. You say in your statement that
4 the overall training to postmasters needed to be
5 improved. Can you expand on that a little bit?

6 **A.** I think generally it was -- the difficulty you got with
7 a network that size is the volume of postmasters and the
8 one size fits all. So you've got your challenge of
9 geography, you had people who couldn't attend the
10 classroom course for whatever reason, you know, Post
11 Office didn't pay for a postmaster to actually come and
12 attend them, sometimes the timing wasn't convenient of
13 the training and then you obviously had the different
14 product mix as well, and then sometimes there would be
15 challenges potentially if you went into a branch and the
16 postmaster wasn't present or you would train staff.

17 So -- and the other thing is you could be giving
18 training to a postmaster but you would only cover the
19 things that were available during that five days. So if
20 a transaction wasn't there, for example because it
21 didn't happen very often, it wasn't covered because you
22 didn't have the opportunity to do it, because you might
23 teach the theory but not the actual practice.

24 So, yeah, I think one of the challenges, I don't
25 think we understood the effectiveness of the training.

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1 You know, it was like that was what you got and that was
 2 it. You know, I don't think there was any kind of
 3 training needs assessment with postmasters to go "Do you
 4 learn by computers, do you -- are you practical?" You
 5 know, there just wasn't the opportunity for that
 6 flexibility. There was no online learning packages at
 7 that time either, it was literally face-to-face or
 8 classroom and that was it. So it probably fell down in
 9 a number of ways.

10 **Q.** Can you assist us with the difference in training that
 11 was provided to Post Office employees versus
 12 subpostmasters?

13 **A.** I think that was managed by central HR teams. When
 14 I joined, I got a two-week counter training classroom
 15 course that I attended and then obviously that would
 16 have followed up in branch. I don't think there was any
 17 kind of formal induction programme for Post Office
 18 employees. When you mean "employees", do you mean like
 19 directly managed staff or do you mean the likes of the
 20 corporate staff like myself?

21 **Q.** I think somewhere in your statement you say,
 22 effectively, that the training that was provided to
 23 employees was better than that to subpostmasters, the
 24 quality and training was better.

25 **A.** Um ... can you point me to where you interpreted that?

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1 **Q.** Can you tell us how that affected the issues that we're
 2 discussing today? So in terms of the offices, you've
 3 said there were area offices prior to that?

4 **A.** Yeah, so in 2006, I think it was McKinsey's that did
 5 a big -- it was a full business restructure and
 6 everybody, I think, bar a very small portion of
 7 colleagues went through what we call a preference
 8 exercise. So they were asked, you know, did you want
 9 a job with the business, did you want to take redundancy
 10 or whatever. So everybody was asked and then one of the
 11 big changes they made in 2006 was, prior to that time,
 12 regardless of what size branch you were, where you were
 13 located or whatever, you had an area manager tagged to
 14 you, and there was a sales and service structure
 15 immediately prior to that in 2006.

16 So one of the big changes of the 2006 restructure
 17 was the decision was made that a large portion of the
 18 network wouldn't actually have an area manager tagged to
 19 them as a branch and that any enquiry that they had
 20 would be tagged to the Network Business Support Centre.
 21 So I think it was about 2,000 branches that were given,
 22 like -- in effect, it was a sales type manager. So they
 23 weren't really supposed to do what we would call the
 24 service elements or, you know, the transactional
 25 queries, that kind of thing. And then literally

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1 **Q.** It's in the statement at different points. It's not a
 2 secret. If you don't agree with it then that's
 3 absolutely fine as well.

4 **A.** Yeah, I probably disagree with it, actually, because
 5 I think it was, you know, I think one of the
 6 observations is that sometimes, you know, Post Office
 7 employees or colleagues didn't understand what it was
 8 like to be in a branch network because they weren't
 9 exposed to the Horizon terminal, the likes that I had.
 10 So it was quite inconsistent and hit and miss so, yeah,
 11 that's not the message I wanted to convey in the
 12 statement, if that's what you were implying.

13 **Q.** You do say in your statement that if there was space,
 14 managers and assistants could attend?

15 **A.** Yeah.

16 **Q.** Are you aware of there not being space in certain
 17 circumstances?

18 **A.** I can't recall any. I think it was about six to eight
 19 places, potentially available. I don't know if anybody
 20 was tracking, you know, what the take-up was.

21 **Q.** In 2006, you were head of network co-ordination --

22 **A.** Yes.

23 **Q.** -- and we'd spoken about that. There was a business
 24 reorganisation in 2006.

25 **A.** Yes.

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1 everybody else was -- that was the decision that was
 2 made, was you would be directed to the Network Business
 3 Support Centre.

4 There was about 11 area offices as part of that
 5 sales and service structure that was closed. So they
 6 all closed and it was left with Maidstone. So one of
 7 the jobs that I was tasked with doing was someone in my
 8 team was closing all of those area offices, which
 9 included things like branch files, we had to relocate
 10 them to Leeds and then, obviously, all of those members
 11 of staff, they went and everything was closed, and it
 12 literally left Maidstone.

13 **Q.** Prior to that reorganisation, if there was a service
 14 problem you would have somebody who could physically
 15 attend the branch?

16 **A.** Yes, so there was a series of, I think, either area
 17 intervention managers or area performance managers.
 18 I can't remember the exact structure because I didn't
 19 work in it but I knew, obviously, colleagues who did.
 20 Yeah, they would manage all of what we'd call the
 21 non-sales issues, so things like problems balancing,
 22 losses, robbery/burglary, relocations, anything like
 23 that, then it would be directed to the regional teams,
 24 and they would then have a plan for how to support the
 25 postmasters within their region.

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1 Q. How did the change impact on that? Say you had
2 a problem with balancing. Was that no longer available?
3 A. So there wasn't necessarily a person to go to, so the
4 route -- one of the things that we had to do when we set
5 up the team in Maidstone was actually understand what
6 all of the processes were that were affected and then
7 decide who was left in the business to pick that piece
8 up and then almost redesign that process. If the
9 Network Business Support Centre couldn't deal with it
10 then that's when it came into the outlet intervention
11 team in Maidstone, which I managed and then we would
12 work with the relevant teams to try to sort something
13 out.

14 So with the balancing enquiry, if they couldn't
15 resolve it, we would do our own investigation in terms
16 of going through the possibilities that it could be, we
17 would possibly liaise with Product and Branch Accounting
18 to see if there's any other information that would be
19 available and, worst-case scenario, we would send
20 somebody out to from what we would call the field team,
21 so a trainer or auditor, to see what could actually be
22 done to help the postmaster.

23 Q. When was that? Was that 2006 or --

24 A. That was 2006.

25 Q. At paragraph 66 of your statement, you say that

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1 value.

2 Q. I think you mentioned there were 2,000 or so branches
3 which had a different level of service?

4 A. Yes.

5 Q. Were those the more commercial branches?

6 A. Yeah, so the bigger branches. You know, the ones that
7 might have the potential to -- because at that time
8 there was sort of the drive to increase Financial
9 Services, so we were moving into car insurance, home
10 insurance, all of those kinds of things and it was felt
11 that actually that those branches had the right
12 demographic, they had the right footfall, they were
13 bigger in remuneration and, therefore, they deserved
14 more support than the smaller ones.

15 Q. You've said that introducing the pre-2006 position or
16 reintroducing that was not a commercially viable option.
17 Can you expand on that?

18 A. So I think -- I mean, the background to the branch
19 standards booklet was, I think, you know, in about 2007,
20 they were starting to feel some of the consequences of
21 not having that, you know, immediate support for the
22 branch, and I think and it was just too expensive to
23 re-introduce a physical presence and I think the
24 preferred option was see what you can do remotely from
25 an outbound perspective before you then start

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1 replacing physical support with remote intervention was
2 not enough for some subpostmasters.

3 A. I don't think it was. You know. It assumed that
4 everybody could cope and everyone was at the same level
5 of, you know, competence, I guess, or, you know, if you
6 he had a new subpostmaster, possibly the ones that had
7 been there quite some time were probably okay because
8 they knew how to do things. I don't think the business
9 knew how people would be affected and didn't tailor that
10 support in accordingly. It was just assumed that
11 everybody could manage on their own.

12 Q. Do you know what the driver was behind the
13 reorganisation?

14 A. I wasn't party to those conversations. I'm making the
15 assumption it was probably cost. You know, there was
16 a big drive that we had to get back to profit as
17 an organisation, the sort of government income from
18 pensions and allowances, the branches were migrating
19 onto card account. You know, in terms of the income
20 that was available to postmasters and Post Office, it
21 was just what -- I think it was a cost commercial
22 decision to do that.

23 They couldn't see the commercial return on having
24 a physical body going out to a branch and supporting
25 them. They couldn't translate that into a monetised

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1 introducing area managers back in. I don't think that
2 was an option for us to consider.

3 Q. I think you also said in your statement that resourcing
4 over the phone support was the best, given the financial
5 circumstances?

6 A. Yes.

7 Q. Do you know who within the company was driving this
8 move?

9 A. I think it was just a top-down -- you know, it was at
10 board level. So I think one of the strategies, I think
11 it was the Forward 5 to 11 that was launched on the back
12 of -- there was the big business restructure, it was,
13 you know, back to profit was the 2006 Forward 5 to 11
14 strategic -- you know, you did Forward 5 to 11 and then
15 the 4 to 11 and then the 3 to 11, so it was very much
16 front and centre driven from the top that actually that
17 was the business strategy that Post Office was going to
18 deploy.

19 Q. You've said there was no central system to understand
20 who had visited which branches --

21 A. No.

22 Q. -- and that some that never been visited or may never
23 have been visited; is that right?

24 A. Yes.

25 Q. Yes. Did that change or is there now a central system?

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1 A. Yeah, so I think over time it definitely did. One of
2 the criticisms is obviously the Second Sight report was
3 obviously there was no central point for recording
4 contact. One of the things that I was involved in 2017
5 was the introduction of Microsoft Dynamics CRM solution
6 which recorded who was making outbound or receiving
7 inbound interventions from branches so that was rolled
8 across like 25 different teams across Product and Branch
9 Accounting, NBSC, Security, a number of different back
10 office teams, HR, so we could at least track who was
11 having a conversation with who about what.

12 They then made that into, I think, the branch
13 information tool, which was made available to area
14 managers, so they could at least understand what their
15 branches were, what conversations they were having with
16 certain branches. I don't think they ever got to the
17 position of, like, physically tracking who was going in
18 and, you know, like you could have a security manager
19 visit one day and an area manager the next. I don't
20 think they ever implemented that. They may have done
21 since I've left. I'm not sure.

22 Q. You said at paragraph 25 of your statement and I think
23 you've repeated it in your evidence today, that
24 postmasters could request further support from the NBSC?
25 A. Yes.

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1 training generated usually about 1,000 calls every month
2 to branches to remind them to do it, and then you might
3 potentially be left with two or three who just may have
4 refused, or didn't do it for whatever reason. In that
5 instance, the postmaster would have been advised
6 beforehand that, you know, "You've got the option to do
7 it, if we need to send somebody out, there is the option
8 that we can charge it". And I think there was a cap on
9 the charge, as well, that it would only be up to
10 a certain amount of money. It was intended to cover the
11 cost of the person that would go out to help.

12 Q. Can you tell us briefly what was branch standards? It's
13 a booklet or something else?

14 A. So the branch standards -- well, it was a booklet in the
15 team so the branch standards was there to define what
16 the business as a whole deemed to be the important sort
17 of standards that a branch should follow. So there was
18 the booklet and the communication and then there was my
19 team, the branch standards team, that would -- we used
20 to send out the scorecard to branches every month to say
21 this is how your performance -- how you're doing against
22 the standards. And then we would make the relevant
23 support interventions as well to branches who we felt
24 needed some help understanding what some of those
25 procedures were.

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1 Q. That's from the 2006 reorganisation.

2 A. Mm-hm.

3 Q. Were you aware that in 2010, the Post Office was going
4 to start charging for visits to the branch?

5 A. Yes, it was. So that was part of the branch standards
6 change that I was involved in implementing. So it was
7 a contractual change with the postmasters and I think
8 there was -- I think there was a charge specifically
9 related to cash holdings, so this was where, if
10 a postmaster failed to regularly declare the cash in
11 branch correctly and, despite any sort of help,
12 intervention and support repeatedly needed to do it, and
13 then somebody had to go out, there was the mechanism in
14 the contract to charge for it if it was deemed
15 appropriate to charge for it.

16 I think the other one in there was the regulatory
17 compliance training. So the post offices had to do
18 I think it was about 12 modules every year and there
19 were a handful of branches that repeatedly failed to do
20 that training, despite your phone calls, help, so it was
21 seen as a last resort for a minority of branches.

22 I can't remember the volume that were involved but
23 we had possibly a handful, every now and again, that
24 were subject to this -- to the charge. But given the
25 volume of telephone interventions the compliance

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1 Q. I'm going to take you to a document can we look at
2 POL00084464. So you will be familiar with this
3 document.

4 A. Yes.

5 Q. It says:

6 "Dear colleague,

7 "I'm pleased to send you the Post Office Branch
8 Standards booklet."

9 So this document and the booklet would go to the
10 Post Office branches?

11 A. Yeah, so there was a covering letter, there was a copy
12 of the booklet, because it was a contractual change they
13 would have received a copy of the contractual amendment
14 as well. Yeah, it would have been part of a pack.

15 Q. Can we scroll down on this page to the paragraph that
16 says, "Starting in June 2010", thank you. It says:

17 "Starting in June 2010, we will pass on to you the
18 cost of any visits to your branch to ensure that
19 compliance training has been completed. We will also
20 pass on the cost of any further training if you are not
21 carrying out your overnight cash or ATM declarations
22 properly, including the cost of visiting your branch to
23 deliver the training. We will also pass on to you the
24 charges we have to pay for missing motor vehicle licence
25 ... discs. The details of how these measures could

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1 affect you are shown in the 'Conformance with the branch
2 standards' booklet included with this letter."

3 Do you think at this time there was a hardening of
4 attitudes towards postmasters in trying to charge them
5 for services that had previously not been charged for,
6 for example?

7 **A.** Um, I'm not sure, really. I think there was probably
8 some discussions around what else we could do, so you
9 would try and help branches as much as you can but
10 you -- sometimes you were just left with a group that
11 just for whatever reason, didn't do what everybody else
12 wanted to do. So I think it was almost -- well, would
13 this sort of act as a motivation if people thought
14 financially they might be impacted by it? Would it, you
15 know, would it make any difference? I'm not sure
16 generally whether a hardening attitude towards
17 postmasters, I don't think.

18 **Q.** Well, let's say if a subpostmaster had a shortfall that
19 they couldn't explain, we've heard that they'd have to
20 pay for the shortfall?

21 **A.** Yeah.

22 **Q.** But now would they also pay for additional support if
23 somebody was required to come and visit them? Would
24 they have to pay?

25 **A.** If you wanted to enforce the contract, then yes.

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1 That was just -- you know, that was just part of what it
2 was every year when we had teams. The budget got, just
3 got reduced, and you would have to find a way to manage
4 that. We had numerous reorgs and most of that was
5 driven of what could you do better, what could you stop
6 doing? What could you reduce?

7 So I think the focus on cost because, you know, it
8 was a commercial organisation that was paid for by the
9 taxpayer, there was that constant need to actually just
10 keep -- you know, reduce it, reduce it, reduce it.

11 **Q.** Can we look at POL00084769. This the "Branch Standards"
12 document?

13 **A.** Yes.

14 **Q.** Is that what would have been attached to that document
15 that --

16 **A.** Yes, it was a small A5 booklet, yes.

17 **Q.** Thank you. If we turn over the page, you have
18 an introduction and that introduction is from Paula
19 Vennells, the network director at that stage?

20 **A.** Yes.

21 **Q.** Was she responsible or was she the driving force behind
22 this branch standards document and the change in
23 approach?

24 **A.** Yes, so this was the initiative. So the branch
25 standards were part of the network efficiency programme

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1 **Q.** We've heard also from some witnesses that the training
2 that had been provided to subpostmasters contained some
3 gaps when it came to things like balancing.

4 **A.** Right.

5 **Q.** Would you agree with that?

6 **A.** I would, yes.

7 **Q.** If you needed more training to cover that, would you
8 have to pay for that? Would that be -- require a visit
9 that you'd have to pay for, potentially?

10 **A.** No, you wouldn't have to pay for those ones.

11 **Q.** Are you aware at this time of continued financial
12 difficulties within the Post Office, so 2010? We spoke
13 about 2006 and the reorganisation.

14 **A.** Do you mean postmasters or Post Office?

15 **Q.** No, the company, Post Office.

16 **A.** In what respect?

17 **Q.** Were there financial pressures still. You spoke about
18 them in 2006. Did those continue in 2010?

19 **A.** I think there was always a focus on cost with Post
20 Office, you know, throughout the whole of my career.
21 There was always the emphasis to do things more
22 efficiently, you know, it's a government funded
23 organisation. It was reduced to tax -- the burden on
24 the taxpayer. What could you do? And it was constantly
25 in the culture that what could you do to reduce costs?

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1 that was set up, that was ultimately sponsored by Paula,
2 I worked to Lynn Hobbs, Lynn Hobbs worked to Paula and,
3 you know, this was the direction that was given. It was
4 we need to try to find a co-ordinated approach of
5 importing standards with the network. So yeah, Paula
6 was completely aware of what we were doing. She would
7 have had to have signed off this opening introduction as
8 well.

9 **Q.** So it was enforcing standards, but it was also, at the
10 same time, trying to meet the cost pressures that the
11 Post Office was under?

12 **A.** Yes.

13 **Q.** Can we look at page 15, please. Thank you. There's
14 a section there on "Processing transactions correctly",
15 on the right-hand side, and I'll read it. It says:

16 "Rectifying mistakes is a significant cost to the
17 Post Office. Whilst we understand that mistakes will
18 happen on occasion, we want to minimise them -- to
19 reduce our costs and give good customer service.
20 Getting transactions right means that we don't have to
21 waste time resolving mistakes. It also gives our
22 partners confidence that we can transact their products
23 in the correct way".

24 There are suggestions there for "Getting it right
25 every time":

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1 "Make sure that you and your teams follow the
2 correct procedures for each transaction. This will
3 increase confidence and help prevent transaction errors
4 and corrections.

5 "If you receive a transaction correction to rectify
6 a mistake, deal with it as soon as possible, and always
7 within the balance trading period.

8 "If a transaction correction has a monetary value,
9 any discrepancies must be dealt with promptly by
10 contacting Product & Branch Accounting."

11 At this period in time, was there a particular focus
12 on mistakes being the fault of the subpostmaster or
13 certainly a belief that the mistakes that were occurring
14 were the fault of the subpostmaster?

15 **A.** I think there was a focus on cost so the view was, you
16 know, you've got people in Product and Branch Accounting
17 in Chesterfield who are literally there because they're
18 sending things backwards and forwards to clients because
19 something has happened in branch. I think there was
20 that.

21 I think there was also an awareness that some of our
22 transactions weren't as easy to follow as they could
23 have been. Yeah.

24 **Q.** Were subpostmasters seen as the cause of some
25 unnecessary costs that were impacting the Post Office?

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1 "There will be specific financial consequences for
2 subpostmasters who do not meet the expected level of
3 performance for some branch standards. The amendment to
4 the subpostmaster contract which introduces the
5 financial consequences is also included with the
6 information that will be sent with the booklet."

7 So again, my reading is that there's a hardening
8 towards the subpostmasters of attitude; is that wrong?

9 **A.** I don't really -- yeah, I can't really give an opinion
10 on that. What from 2006 to 2010 or a specific time
11 period?

12 **Q.** Well, in 2010 you had these branch standards and
13 subpostmasters are being threatened with specific
14 financial consequences. Do you agree that that it has
15 that kind of a tone about it or not?

16 **A.** Yeah, it does have a tone about it. I don't know
17 whether that changed significantly from 2006 or there
18 was a step change. I'm not sure.

19 **Q.** I mean, we see there, for example, the fourth bullet
20 point:

21 "If branches fail to complete cash declarations,
22 including those relating to ATMs, and performance
23 doesn't improve following remote intervention, a member
24 of the Network Support Field Team will visit the branch
25 to conduct further training, which will be at the cost

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1 **A.** I think probably somewhere but then I think also there
2 was the view that some transactions were potentially
3 difficult. I think it was probably a combination.

4 **Q.** What do you mean by "difficult"?

5 **A.** So, you know, throughout the some of the evidence
6 obviously things like scratchcards, reversals, that kind
7 of thing. I think, you know, a lot of the information
8 within the bundle sort of alludes to the fact that some
9 of this stuff wasn't as easy as it could have been in
10 terms of the product process.

11 **Q.** How was this assisting, telling subpostmasters to just
12 get it right, to follow the correct procedures?

13 **A.** I mean, in hindsight it's probably not, is it?

14 **Q.** I'm going to move on to another document that I think
15 accompanied the branch standards. Let's look at
16 POL00084774. I'm just going to read to you that first
17 paragraph or some of the first paragraph.

18 Can you just tell us briefly, though, was the
19 document that went alongside --

20 **A.** Yes.

21 **Q.** -- it was to be read along --

22 **A.** It would have been like Q&As gone out with it, yes.

23 **Q.** "What type of consequences will there be for not
24 complying with branch standards, including selected
25 standards?"

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1 of the subpostmaster."

2 Scrolling down:

3 "The existing contractual consequences for poor
4 application of branch standards remain. This includes
5 the possibility of action being taken under the
6 subpostmaster contract. This could be corrective action
7 with a possibility of contract termination, and/or
8 removal of a product from the branch. If
9 a subpostmaster has a query relating to specific areas
10 of their contract then this query should be raised with
11 the Human Resources Service Centre. Certain breaches of
12 branch standards which involve regulatory bodies may
13 instigate criminal [proceedings]."

14 In this question and answer document, is there, for
15 example, any mention of how a subpostmaster might
16 dispute a transaction correction?

17 **A.** Within this one or the branch standards one?

18 **Q.** Yes.

19 **A.** I can't recall, to be honest, Julian.

20 **Q.** How about disputing discrepancy in their figures and
21 their branch trading statement? Were those kind of
22 things addressed in either the branch standards document
23 or the accompanying Q&A?

24 **A.** I don't think so. I think there was an agent support
25 charter, I think -- I can't remember the time when that

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1 came out. I don't know if that was before or after the
2 branch standards booklet and that was around the service
3 level agreements that Post Office would provide to
4 postmasters. I think that covered it but I can't
5 remember when that was produced.

6 **Q.** Just while we're on this document, if we scroll down to
7 page 3, the final page:

8 "Will new subpostmasters be subject to the same
9 standards and consequences?"

10 "Regardless of how long someone has been
11 a subpostmaster, we expect them to achieve the branch
12 standards."

13 The final sentence there:

14 "Also, any branch losses will be the responsibility
15 of the subpostmaster from the day of taking over the
16 branch."

17 Was it assumed during this period that, if there
18 were losses, they were caused by user error rather than
19 any fault with the Horizon System?

20 **A.** Yeah, I think that was just a widespread Post Office
21 assumption, that it was due to what they would call
22 "branch non-conformance" or "user error".

23 **Q.** Thank you. Thank you. I'm going to move on to
24 a different topic and that's suspension and appeals.

25 You've explained that at one point you attended

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1 were?

2 **A.** So there was a group of people who were selected to be
3 appeals manager. I was one of those. The contracts
4 manager would manage the contractual proceedings or
5 processes with the postmaster. They would make
6 a decision in terms of whether the contract needed to be
7 terminated and on what grounds, relating to the specific
8 part of the contract. The postmaster was then given the
9 opportunity to appeal that decision and then I think
10 they submitted their request to the HR service centre,
11 and then they would be just an appeal manager allocated
12 to that particular case and I was one of those managers
13 that was selected if a postmaster want to actually
14 appeal.

15 I would then receive the appeal papers relating to
16 that case. So that would be a bundle from the contracts
17 adviser or contracts manager who'd dealt with that case,
18 any information that was relevant to how that decision
19 had been made, any kind of meeting notes, that kind of
20 thing. I would then contact the postmaster and arrange
21 to meet them and they'd have the opportunity to sort of
22 like have that discussion with me, present any new
23 evidence. I'd review the case in terms of what was the
24 evidence provided? Was the decision appropriate? Had
25 the case been handled correctly? And then, ultimately,

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1 audits. I think you were shadowing or something along
2 those lines.

3 **A.** Yes.

4 **Q.** Can you briefly tell us in what capacity that was in?

5 **A.** It was just as a learning exercise, so just to find out
6 what actually happened, what it would involve. So
7 I just attended the branch audit to actually see what
8 happened.

9 **Q.** Did you come across any auditors who were not acting
10 professionally?

11 **A.** No, not in my experience.

12 **Q.** Are you subsequently aware of any unprofessional conduct
13 by auditors?

14 **A.** I think -- I can't remember specific examples but
15 I think, obviously, there were some concerns raised, you
16 know, as part of the Inquiry. But I can't remember the
17 specific ones. I didn't have any raised individually to
18 me.

19 **Q.** When you say "Inquiry" do you mean this Inquiry or --

20 **A.** This Inquiry, yes.

21 **Q.** Were you involved in appeals against termination?

22 **A.** I was, yes.

23 **Q.** What role were you --

24 **A.** I was the appeals manager.

25 **Q.** Can you tell us how those took place, what format they

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1 make the decision around whether it was appropriate to
2 terminate that postmaster's contract.

3 **Q.** What period of time are we talking now?

4 **A.** So that would have been from, I think -- because I think
5 you could only do it when you were classed as a senior
6 manager, so I think it was from 2006 onwards. I think
7 my last postmaster appeal probably would have been about
8 2018.

9 There was a period where we didn't do them because
10 there was a decision made -- I can't remember what time
11 scale it was, but the -- there was -- as part of one of
12 the business reorganisations, there was a dedicated
13 appeals manager that, rather than try and farm them out
14 to individual senior managers across the business, there
15 was a gentleman called Andy Bayfield who managed or who
16 heard all of the appeals regardless of geography. And
17 then I think that -- I think Andy left in about 2010 and
18 then reverted back to individuals across the business.

19 **Q.** I think you said in your witness statement that in the
20 majority cases there was a financial discrepancy that
21 had occurred, that was a contributing factor.

22 **A.** Yes.

23 **Q.** Were subpostmasters represented at these appeals?

24 **A.** Yes, so they had the opportunity -- so part of the
25 appeals process is they could bring a friend or

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1 a colleague or a member of the National Federation of
2 SubPostmasters. I think everyone bar one that I ever
3 did was always with two people.

4 **Q.** Not legal representatives, though?

5 **A.** No.

6 **Q.** No. What was your understanding of how easy it was to
7 obtain what we know as ARQ files?

8 **A.** So these are the files from Fujitsu. So my
9 understanding was that Post Office as an organisation
10 were allowed so many ARQ files, sort of, per year.

11 I think the number was about 300 or 400 or whatever.

12 That was managed by the security investigations team.

13 I think if you needed access to one for whatever reason,
14 you could request it through of the security
15 investigations team. I don't think they were made
16 available as a matter of course. You know, for each
17 suspension case.

18 **Q.** I think you've mentioned in your statement a few
19 different types of logs. You've talked about
20 transaction logs, keystroke logs and ARQ logs.

21 **A.** Yes.

22 **Q.** Do you know the difference between them?

23 **A.** I think the ARQ was almost the keystroke log, so that
24 would record everything in terms of what the user in
25 branch had, you know, allegedly pressed. The

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1 at the appeals interview, if I felt that I needed access
2 to that information, I could make that request. I think
3 it would depend on the timescale involved as well, and
4 whether it was still available, but I knew who to go to
5 if I needed one. I couldn't answer for the other
6 appeals managers. I don't know if they knew that they
7 could get one. I knew I could get one but I didn't know
8 if they could.

9 **Q.** Who would you get it from?

10 **A.** So it would have been -- well, whoever was running the
11 security investigations team so there was number of
12 people that I would have known to make contact, head of
13 security, who ever was fulfilling that role at the time.

14 **Q.** Who prepared the appeals bundle for you?

15 **A.** It usually got sent by the contracts manager so they
16 would be -- it would be bundled up as a file. I think
17 you could get a hard copy file as well, so there was
18 an admin team in Leeds who would post whatever hard copy
19 information you needed to your house or there was
20 an electronic copy as well.

21 **Q.** If the basis of the termination was a financial
22 discrepancy, would ARQ data be provided ordinarily or is
23 that --

24 **A.** I don't think it was a standard process. I don't think
25 it was something that -- like as part of a checklist

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1 transaction log was the log that would be generated from
2 Horizon. So I think anybody with manager access -- and
3 it was -- it didn't have everything, so it was like the
4 transaction stamp of the day. You could run
5 a particular time period, so if you had a discrepancy
6 that you could move the transaction log and then print
7 one in branch.

8 So the transaction log was actually in branch; the
9 ARQ and the keystroke stuff was the bits that were
10 provided by Fujitsu.

11 **Q.** For the ARQ and the keystroke, would you have to go
12 through the security team --

13 **A.** Yes, you would.

14 **Q.** -- is that something --

15 **A.** Yes, you would.

16 **Q.** Can you describe the difficulties in obtaining that
17 information?

18 **A.** I never experienced any. I can't remember instances
19 where I would. I didn't know if anybody had been
20 refused, obviously until I read the additional bundles
21 that you sent through for the Inquiry.

22 **Q.** As part of the appeals process, though, are you aware of
23 ARQ data being requested, being used, in the appeal?

24 **A.** I would have used, if it was part of the bundle of
25 papers. If -- depending on what the postmaster had said

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1 that you would do. I don't think it was -- I don't
2 think it was something that was always included.

3 **Q.** Was it sometimes included, rarely included, often
4 included?

5 **A.** Um, sometimes, I think, from recollection.

6 **Q.** Do you recall any subpostmasters wanting additional data
7 and not being able to receive it?

8 **A.** Um, I can't recall anybody saying to me that they didn't
9 get it. What I used to do was, you know, print
10 everything off and send it to them that I was going to
11 consider, that -- in advance of that meeting, so that
12 they could see it, so that we could discuss it and then,
13 should anything come across as part of that meeting that
14 you might want to go and look at, so whether you needed
15 access to any remittance slips or anything like that, if
16 there was any information that came subsequently, the
17 postmaster would get hold of it. I think the challenge
18 was if they didn't know what they could have, would they
19 know to ask, necessarily.

20 **Q.** Do you recall there being information provided to
21 subpostmasters about the availability of that kind of
22 data?

23 **A.** No.

24 **MR BLAKE:** Briefly before -- sir, I was woefully optimistic
25 as usual, so we will certainly go over after lunch.

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1 **SIR WYN WILLIAMS:** We'll take a normal lunch.
 2 **MR BLAKE:** We'll take a normal lunch break but I'll just ask
 3 you a few questions before we break to lunch and that
 4 relates to HORice.
 5 **A.** Yes.
 6 **Q.** We heard a little bit about that this morning. I think
 7 that stood for Horizon Information Centre; is that
 8 right?
 9 **A.** Yes, that's correct.
 10 **Q.** When was HORice introduced?
 11 **A.** So that would have been part of the Branch Support
 12 Programme, so that was -- I think it was towards the
 13 tail end of 2014. Yeah, I went on maternity leave in
 14 October 2014 and I think it was just starting to be --
 15 we were getting towards the end of that particular
 16 project. So it would have been not long after that.
 17 **Q.** How did that differ to what was available before?
 18 **A.** So the main difference with HORice, so if a postmaster
 19 rang up and said they had problems balancing or they
 20 didn't know what had gone wrong, or X, Y and Z, it was
 21 really difficult for anybody at the end of that phone to
 22 actually understand what had been pressed. It was
 23 almost like the adviser was working blind and it relied
 24 on the postmaster relaying that information.
 25 What HORice enabled a certain number of users to do,
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1 who was using it, and for what purpose. But there
 2 wasn't -- you know, if a postmaster saw, for example,
 3 when they contacted the Network Business Support Centre
 4 and the person helping them -- because it was usually
 5 like a tier 2 type person because you'd have to like go
 6 away, look at it, and then get back to the branch --
 7 there was no issue in providing that postmaster with,
 8 you know, a copy of that, because that's what you'd
 9 based your conclusion on, really.
 10 **Q.** Do you know what triggered the change to HORice?
 11 **A.** So my recollection was, so I got called to a meeting by
 12 Fujitsu. I think it was Tony Jamasb from service
 13 management. So there was myself, Anne Allaker and we
 14 went to Bracknell, we got invited to a meeting with
 15 Fujitsu where they actually showed us a demonstration of
 16 HORice. Myself and Anne were involved in the Branch
 17 Support Programme at the time and it was positioned to
 18 us as would this -- what benefit would this bring the
 19 Post Office if you had -- if you had access to this
 20 system? It was -- I think it was based on what they
 21 were using to track, like, whether terminals were down
 22 and that kind of stuff.
 23 So as part of that exercise I went back and sort of
 24 talked to various people within the business, like
 25 Angela van den Bogerd and, you know, we looked at, well,
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1 it was, in essence, the ARQ data within like I think it
 2 was like a 15-minute window. So by making that
 3 available, you could actually understand if the
 4 postmaster had served in the wrong stock unit or logged
 5 off or not done, like, a fallback and recovery process
 6 correctly.
 7 More Post Office users had access to, in effect,
 8 what was the ARQ data and could see and try and use that
 9 data to help try and work out what had happened in that
 10 branch to try to rectify any errors or mistakes.
 11 **Q.** So that information was available to the subpostmaster
 12 or assistant?
 13 **A.** We would provide it if it was requested. HORice was the
 14 system that was used internally, so it was
 15 a licence-based system that I think it started off
 16 small, so there was identified users within the Network
 17 Business Support Centre, Cash Management, Product and
 18 Branch Accounting and the Security Investigations Team
 19 as well.
 20 **Q.** Did you still have to go through the security team to
 21 obtain the information?
 22 **A.** No, as I say, it was about widening that up with
 23 a limited number of users but in like a controlled
 24 environment because, obviously, there was sensitive, you
 25 know, information in there. So you had to understand
 94

1 what benefit would this give? And then we'd obviously
 2 just implemented the project and then deployed it,
 3 because it was felt that, actually, it could provide
 4 some real help, and try and to resolve some issues and,
 5 you know, reduce this reliance on the ARQ but also give
 6 postmasters a quicker resolution time in terms of
 7 somebody being able to see the data, rather than it just
 8 being in a closed shop.
 9 **Q.** When it was presented to you by Fujitsu, had they
 10 expressed any concerns or frustrations relating to the
 11 provision of ARQ data?
 12 **A.** Not that I'm aware of. Not as part of that meeting.
 13 **Q.** Were you aware of any concerns within the Post Office
 14 about the difficulties in obtaining ARQ data?
 15 **A.** I think the main concern that I was aware of was the
 16 cost, if you wanted -- there were additional stuff over
 17 the quota. I don't know whether it was necessarily
 18 an issue of not getting hold of the data. I think
 19 sometimes there was a question of who would pay for it,
 20 if it was needed, because it didn't fit within the --
 21 what you were allowed.
 22 **MR BLAKE:** Okay. Thank you very much.
 23 Sir, that's an appropriate time --
 24 **SIR WYN WILLIAMS:** While it's on our mind, can I just ask
 25 one or two more questions about the appeal process?
 96

1 A. Yeah.

2 **SIR WYN WILLIAMS:** Apart from the time when Mr Bayfield took

3 over all the appeals, you said you were part of a group

4 doing them.

5 A. Yes.

6 **SIR WYN WILLIAMS:** Approximately how many of you?

7 A. Um, I think there was about 15, 20 people.

8 **SIR WYN WILLIAMS:** So, in any given year, let's put it in

9 that way to start with, how many do you think you

10 personally would do?

11 A. I think it was about three or four we'd get.

12 **SIR WYN WILLIAMS:** Three or four a year?

13 A. Yeah.

14 **SIR WYN WILLIAMS:** Fine. So as a guesstimate, in the period

15 between 2006, 2018, taking out Mr Bayfield's time,

16 overall, 20, 30 appeals, that sort of thing?

17 A. Yeah, that probably seems about right.

18 **SIR WYN WILLIAMS:** Right. Don't be too legalistic about it

19 but your decision, were you reviewing what the contracts

20 manager had done or were you actually looking at it all

21 afresh and coming to your own decision?

22 A. I think you were supposed to do the former, I tended to

23 do the latter.

24 **SIR WYN WILLIAMS:** Right, well that's not entirely

25 surprising. So there was a kind of process which told

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1 contract had been terminated?

2 A. Yes.

3 **SIR WYN WILLIAMS:** Right. Thank you very much. Okay 2.00.

4 (1.03 pm)

5 (The Short Adjournment)

6 (2.00 pm)

7 **MR BLAKE:** I'm going to move on to the topic of Second

8 Sight. Did you have any direct contact with Second

9 Sight?

10 A. No.

11 Q. Can we look at POL00106194, please. It's the final page

12 of that document that I'd like to start with. This is

13 an email chain that is ultimately forwarded to you, or

14 you're a copy recipient?

15 A. Yes.

16 Q. But I'm going to start at the back. The penultimate

17 page, page 4. Thank you very much. So there is

18 an email at the bottom there from Antonio Jamasb?

19 A. Jamasb. Yeah, Tony Jamasb.

20 Q. What was his role?

21 A. I think he worked in service management in the IT

22 department.

23 Q. Do you know Dave?

24 A. Dave Hulbert, yes. So Dave was in managed services so

25 I think he was something to do with the relationship

99

1 you what you should do?

2 A. Yes.

3 **SIR WYN WILLIAMS:** So it was a review, I'll call it

4 a review.

5 A. Mm-hm.

6 **SIR WYN WILLIAMS:** But you being you decided to look into it

7 for yourself?

8 A. Yeah.

9 **SIR WYN WILLIAMS:** Is that it? Okay. How often did the

10 appeal succeed roughly?

11 A. Not very often. I never overturned one once.

12 **SIR WYN WILLIAMS:** Right. Well, that's fine.

13 There was one other short point that's just eluding

14 me for the moment. Yeah, were the appeals in the main

15 made when someone had had their contract terminated, or

16 were there appeals about other things as well?

17 A. Um, it was -- the contract ones was usually about --

18 formal appeal would be when the contract was terminated.

19 **SIR WYN WILLIAMS:** Yes.

20 A. You would get sort of individuals where a decision had

21 been made that, like a transaction correction or

22 something, and there was -- you might get asked to

23 review a decision.

24 **SIR WYN WILLIAMS:** But of the approximately 30 appeals that

25 you dealt with, were they, the vast majority, where the

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1 with Fujitsu and IT.

2 Q. Thank you. I'll just read that, it says:

3 "The NBSC has been provided with no information

4 regarding the Audit Press Release ..."

5 Do you recall what the audit press release was?

6 A. I can't remember the detail. Looking at this email that

7 you've presented earlier, I am assuming that some kind

8 of statement was released about the potential review

9 with Second Sight.

10 Q. So it says:

11 "... so I have drafted the following and if you are

12 happy with it I will send it onto NBSC.

13 "As discussed if we get any enquiries from Branches

14 regarding the recent press release from Post Office

15 regarding the independent audit of the Horizon System

16 please use the following quote ..."

17 So this was a proposal to send this to those who

18 worked on the NBSC.

19 A. Yes, because they would have been getting calls from

20 branches asking, you know, they would have seen it in

21 the local press or national press and it would have

22 generated some activity.

23 Q. We will see from the later emails but it seems as though

24 the concern is that the NBSC --

25 A. They don't know what to do with it, yes.

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1 Q. And they have received requests from audits of branches?
 2 A. Yes.
 3 Q. The line to take there is:
 4 "The Post Office continues to have absolute
 5 confidence in the robustness and integrity of its branch
 6 accounting processes.
 7 "Over the past 10 years, many millions of branch
 8 reconciliations have been carried out with transactions
 9 and balances accurately recorded by more than 25,000
 10 different subpostmasters."
 11 Was that a line you were familiar with at all?
 12 A. I think that was what ended up being used quite a lot
 13 within the communications.
 14 Q. Do you know where it was coming from?
 15 A. I'm not sure where it came from, to be honest, Julian.
 16 Q. If we go up in this chain and the email on the second
 17 page -- or third page, sorry. Friday, 22 June, 2.38 --
 18 thank you very much. It says there "As discussed", it's
 19 the italicised part:
 20 "As discussed if we get any enquiries from Branches
 21 regarding the recent press release from Post Office
 22 regarding the independent audit of the Horizon System
 23 please use the following quote ..."
 24 That's the quote. Below the quote, it says:
 25 "However, some branches may request to be involved
 101

1 A. Kevin was the network director.
 2 Q. So the network director at that stage was saying that we
 3 don't want to give people the option of the audit?
 4 A. Unless they ask for it.
 5 Q. Yes. If we scroll up to the first page, we have those
 6 emails forwarded to yourself. Do you know why you were
 7 included in this chain?
 8 A. Yeah, so I worked for Craig at the time, so people on
 9 copy -- so you've got Tony Jamasb and myself, John
 10 Breeden, Lin and I think probably Sue did, so we were
 11 part of Craig's lead team.
 12 Q. I will just read the second at third paragraphs. It
 13 says:
 14 "Taking Kevin's point, I would hope that we do not
 15 get a great number as it should not be 'offered' but
 16 than you pick up and maintain the request list within
 17 your team please?"
 18 Are you aware of there being a list of branches that
 19 have called in following this press release?
 20 A. Yeah, because we had to set up a process on the back of
 21 that. So I worked with Pat to understand which branches
 22 were actually ringing in and it was then obviously
 23 working with Angela to decide what would happen with
 24 those branches who'd made that request.
 25 Q. Are you able to tell us, were those branches offered
 103

1 in this exercise. Advise them that we will forward
 2 their details on to the relevant department, but at this
 3 time you have no further details."
 4 A. Yeah.
 5 Q. If we could scroll up again in the chain, to the top of
 6 the second page, this in email from Kevin Gilliland, is
 7 it?
 8 A. Gilliland, yes.
 9 Q. It says there -- sorry, if we can scroll to the second
 10 page. Yes, there we go:
 11 "Please can we be absolutely clear that we should
 12 make no reference to the option of the audit unless it
 13 is specifically requested. I am sure that all calls
 14 will be seeking clarification about the statement and we
 15 don't want to cause unnecessary work and process."
 16 What do you understand Kevin to have meant in that
 17 email?
 18 A. I think he's making the assumption that people are just
 19 asking the question about the press release and I would
 20 interpret it that he doesn't want to offer the audit
 21 unless they ask for it. That's what I read from that.
 22 Q. So there's a press release that it seems to be about
 23 Second Sight's involvement?
 24 A. The request to be involved I think, yeah.
 25 Q. Yes. Who was Kevin? Can you remind me, sorry?
 102

1 an audit by Second Sight or offered something that they
 2 hadn't been offered before?
 3 A. I think Second Sight were made aware of the request to
 4 be included. I don't know what the decision process was
 5 about which ones would be included or not. We would
 6 have just forwarded the list.
 7 Q. Are you aware of somebody having that contact with
 8 Second Sight to forward the list?
 9 A. I think that was done through Angela van den Bogerd.
 10 I didn't have any contact with them directly.
 11 Q. It says:
 12 "I'd like to understand the nature/reason background
 13 as would normally when anything is escalated from NBSC.
 14 As we always say a physical audit at branch counts how
 15 many beans are there at that time, it doesn't do
 16 anything else and certainly doesn't test the system
 17 which is what I believed the independent review is
 18 about. Let's see how it develops."
 19 Was there an understanding within the Post Office
 20 that a physical audit at branch couldn't really test the
 21 system that was being used.
 22 A. Yeah, I don't think it was there to decide whether the
 23 system, like, was functioning correctly from an IT
 24 perspective. It was a verification of stock and assets,
 25 stock and cash. You had the financial audit and then
 104

1 the compliance audit. I don't think there was any
 2 provision for an IT audit as such.

3 **Q.** Did you have any further involvement in this particular
 4 issue? We'll get on to some meetings that you had with
 5 lawyers, et cetera, but in terms of this specific issue
 6 about people calling the NBSC, aware of the Second Sight
 7 issue?

8 **A.** Yeah, so I think this was the start of the
 9 communications, so this was the list that obviously was
 10 then forwarded to Second Sight to include. There was
 11 then processes that we put in place on the back of that
 12 to record, and make sure we resolved any branches that
 13 were raising concerns about Horizon Issues, which then
 14 formed part of the weekly call with the various
 15 stakeholders, which is part of the agenda that you've
 16 included in the pack. So this was almost like
 17 a precursor to those.

18 **Q.** So we see and we'll come to those Bond Dickinson notes?
 19 **A.** Yes.

20 **Q.** Is that related to this?
 21 **A.** It will be. That will be the end part. This was
 22 obviously just the start of obviously the processes that
 23 were followed. They ultimately ended up in those Bond
 24 Dickinson conversations.

25 **Q.** Thank you. Can we look at POL00029744. This is the
 105

1 [a subpostmaster]."
 2 Paragraph 7.1:
 3 "It has become clear that whereas the Horizon System
 4 appears to achieve its intended purpose almost all of
 5 the time and operates smoothly for most [subpostmasters]
 6 and their staff, some combinations of events can trigger
 7 situation where problems occur."
 8 Had those kinds of issues been brought to your
 9 attention at all?

10 **A.** No.

11 **Q.** If we go over the page to page 8, we have the
 12 preliminary conclusions because this is, of course, the
 13 interim report of Second Sight?

14 **A.** Yes.

15 **Q.** 8.1:
 16 "This is an Interim Report and there is much work
 17 still to be done. Any conclusions reached at this point
 18 will need to be updated in the light of new information
 19 that arises as the Investigation continues."
 20 Then it lists below that the preliminary
 21 conclusions. The first is that:
 22 "We have so far found no evidence of system wide
 23 (systemic) problems with the Horizon System;
 24 "We are aware of 2 incidents where defects or 'bugs'
 25 in the Horizon software gave rise to ..."
 107

1 interim report produced by Second Sight. The date of it
 2 is July 2013, so we're now a year on.

3 **A.** Yes.

4 **Q.** Can we turn to page 5, please. Did you see this report
 5 at the time that it was produced?

6 **A.** I can't recollect. The first time that I think I saw it
 7 was when you sent me it.

8 **Q.** Let's go through a few of their observations and
 9 conclusions. Can we look at paragraph 6.4, the bottom
 10 of page 5. It says:
 11 "In the course of our extensive discussions with POL
 12 over the last 12 months, POL has disclosed to Second
 13 Sight that, in 2011 and 2012, it had discovered
 14 'defects' in Horizon Online that had impacted 76
 15 branches."
 16 At this time, was that something you were aware of
 17 at all?

18 **A.** No.

19 **Q.** If we go over the page, please, the first defect is
 20 referred to as the receipts and payments mismatch
 21 problem, paragraph 6.6. The second defect referred to
 22 as the local suspense account problem. Paragraph 6.7.
 23 "POL was unaware of this second defect until, a year
 24 after its first occurrence in 2011, it reoccurred and
 25 an unexplained shortfall was reported by
 106

1 That's the errors and bugs that we spoke of before
 2 that hadn't been brought to your attention.

3 **A.** Yeah.

4 **Q.** "Occasionally an unusual combination of events, such as
 5 power or communications failure during the processing of
 6 a transaction, can give rise to a situation where
 7 timely, accurate and complete information about the
 8 status of a transaction is not immediately available to
 9 a [subpostmaster]."
 10 Is that something that had been brought to your
 11 attention?

12 **A.** Not before then, but I think on the back of this they
 13 did some work with the -- it was called the fallback and
 14 recovery process. So I think following this interim
 15 report I think there was a recommunication back out to
 16 branches because it was quite a complicated process to
 17 follow to. If your connection was lost, there were
 18 certain transactions that you could recover immediately
 19 and ones that you couldn't. So I think I became aware
 20 of that through the subsequent comms that they did on
 21 the back of this.

22 **Q.** So your understanding of that at the time was that it
 23 was a power cut or something like that would cause
 24 a recovery issue?

25 **A.** It's the power cut or the communication side. So, you
 108

1 know, if the Internet signal cut out mid-transaction,
 2 there'd be procedures that the branch would have to
 3 follow to recover that transaction.

4 **Q.** Then (d):
 5 "When individual [subpostmasters] experience or
 6 report problems, POL's response can appear to be
 7 unhelpful, unsympathetic or simply fail to solve the
 8 underlying problem."
 9 That's something that we will come on to look at
 10 because that's something that I think you looked at in
 11 depth.

12 **A.** Yeah.

13 **Q.** (e):
 14 "The lack of an effective 'outreach' investigations
 15 function within POL, results in POL failing to identify
 16 the root cause of problems and missing opportunities for
 17 process improvements."
 18 Then (f):
 19 "The end of Trading Period processes can be
 20 problematic for individual [subpostmasters],
 21 particularly if they are dealing with unresolved
 22 Transaction Corrections ... The lack of a 'suspense
 23 account' option means that it is difficult for disputed
 24 TCs to be dealt with in a neutral manner."
 25 Now, you say you first saw this report --
 109

1 Now, having not read the Second Sight report
 2 yourself, where was that message coming from?

3 **A.** So that would have been conversations with myself and
 4 Angela van den Bogerd.

5 **Q.** So is it something that Angela van den Bogerd had told
 6 you?

7 **A.** Yes, as part of our discussions, part of the initiation
 8 of the programme.

9 **Q.** Do you think it was unusual to be taking forward
 10 a programme that was based on a report that you hadn't
 11 read?

12 **A.** In hindsight, yeah, I should have asked to see the
 13 report but I trusted the information that was being told
 14 to me.

15 **Q.** Thank you. If we look at the "Scope", slightly down on
 16 the page, it says:
 17 "The interim report identified the following areas
 18 of concern which will be included within the scope of
 19 the Programme."
 20 "Post Office's attitude to subpostmasters which is
 21 often defensive and unsympathetic ..."
 22 So that's very close to what was written in the
 23 report itself.

24 **A.** Yeah.

25 **Q.** "Inadequate Helpdesk support with responses that are
 111

1 **A.** When you sent me it.

2 **Q.** In the pack for the Inquiry?

3 **A.** Yeah.

4 **Q.** Let's look at the Branch Support Programme. What was
 5 the purpose of the Branch Support Programme?

6 **A.** So that was set up on the back of I'd received the
 7 information second time around, some of the thematic
 8 issues that might come through. So, as a result of
 9 those conversations the Branch Support Programme was set
 10 up, and that's what I was asked to lead.

11 **Q.** Can we look at POL00039158. Thank you. Is this
 12 a document that you are familiar with?

13 **A.** Yes, I think I wrote it because my name is on the top.

14 **Q.** Thank you. If we look at the background, I'll just read
 15 that first paragraph, it says:
 16 "To address the concerns about the Horizon System
 17 that have been raised by some subpostmasters over recent
 18 years, the Post Office commissioned an independent
 19 review of their cases."
 20 So that's the Second Sight review.

21 **A.** Yeah.

22 **Q.** "The company that conducted the review issued an interim
 23 report on ... 8 July 2013. The review made it clear
 24 that the Horizon computer system and its supporting
 25 provides function effectively across our network."
 110

1 script based, coupled with a decrease in overall branch
 2 support.

3 "Lack of timely, accurate and complete information
 4 provided to subpostmasters to support them in resolving
 5 issues."
 6 "Inexperienced trainers and gaps in training
 7 coverage."
 8 "Lack of centralised data or files specific to each
 9 branch which hinders the quality investigation from
 10 taking place."
 11 Now, some of those do match what the Second Sight
 12 report was saying.

13 **A.** Mm-hm.

14 **Q.** There is, of course, the absence there of the mention of
 15 the bugs and defects?

16 **A.** Yes.

17 **Q.** Was that something that anybody mentioned in the context
 18 of your programme?

19 **A.** No.

20 **Q.** One other thing, I think, that was missing from this
 21 scope was the reference to (f), which was the lack of
 22 a suspense account function, in the Second Sight report;
 23 do you recall that final reference?

24 **A.** Yeah, I wasn't asked to look at that.

25 **Q.** Were you aware of that being a concern?
 112

1 A. I think at like a higher level, yeah.

2 Q. Insofar as those were findings or based on findings from
3 Second Sight, do you agree that those were problems
4 within the Post Office?

5 A. Yes.

6 Q. Can we turn to page 2, please. Looking there at the
7 "Governance and key stakeholders", it says:
8 "Alice Perkins and Paula Vennells have requested the
9 establishment of the Programme which will be led by
10 Angela van den Bogerd. Gayle Peacock will be
11 accountable for running the Programme on an operational
12 level."
13 Had Ms van den Bogerd spoken to you about the Second
14 Sight report?

15 A. Yes, she will have done, yes.

16 Q. Was she the direct channel from which you were getting
17 the summary of that report?

18 A. Yes.

19 Q. Did you speak to Alice Perkins or Paula Vennells at all?

20 A. Never Alice. I think I spoke to Paula once during the
21 programme but my interactions were with Angela.

22 Q. Did any of them express any particular opinion on the
23 Second Sight investigation, the quality of that
24 investigation, whether they disagreed or agreed with it?

25 A. I was given an indication that they probably weren't in
113

1 will be closed, supported by a deployment and resource
2 plan."
3 Was the plan, as far as this programme is concerned,
4 to look at things as they then stood rather than look
5 back at historic cases or did you intend to look at
6 historic cases as well?

7 A. I think it was as they stood then.

8 Q. So the reference to "as is" for example, is that --

9 A. Yeah, it's the current business operating model.

10 Q. Are you aware at this time of any consideration being
11 given to how problems that had been identified by Second
12 Sight in their independent report had impacted
13 potentially on historic prosecutions, terminations,
14 suspensions and things like that?

15 A. I knew that obviously there was discussions around if
16 the prosecution policy was actually going to continue or
17 not. I didn't know anything about the individual cases.

18 Q. I mean, let's say those appeals that you had been part
19 of, the termination appeals, did at this stage, knowing
20 at least the information that had been provided to you
21 about the Second Sight report, did that raise any
22 concerns with you about whether people had been unfairly
23 terminated previously?

24 A. Not at that stage because the message was that Horizon
25 was generally okay.

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1 the same place as Second Sight and the conversations
2 were difficult but that was as far information that was
3 shared with me.

4 Q. Who was sharing that information?

5 A. That was with Angela.

6 Q. If we look down on this table, these are the different
7 key stakeholders. We have there, for example at the
8 bottom, Rod Ismay, Andy Winn from Finance.

9 A. Yes.

10 Q. Were they people who you discussed problems with
11 Horizon?

12 A. Yes, so I'd had, like, working relationships with Rod,
13 and Andy from my days as network co-ordination.

14 Q. Did they express any concerns about the operation of
15 Horizon?

16 A. I don't think so.

17 Q. If we go over the page to "Key Deliverables", so:
18 "The Programme will be responsible for delivering
19 the following:
20 "Mapping the 'as is' process for providing branch
21 support and the various touch points for branches.
22 "Undertaking a gap analysis for each of the
23 respective areas regarding the concerns raised in the
24 interim report.
25 "Producing recommendations for how the relevant gaps
114

1 Q. The message from who?

2 A. I think it was just generally across the business. That
3 was just the message that was given.

4 Q. Where, at that time, did you consider that message was
5 coming from?

6 A. I think it was top down, to be honest.

7 Q. "Top" being?

8 A. Board level.

9 Q. Can we look at page 4, please. "Key Performance
10 Indicators and Measures", you have there, if we scroll
11 down, a mention of branch losses and debt and then
12 mention of system, robustness of the system. Do you
13 recall how these KPIs were being measured at all?

14 A. I can't recall those.

15 Q. Then the final, page 5, at the bottom of page 5,
16 7 August 2013 is version 3 of this document. It says:
17 "Input from Programme Board to include additional
18 names, Programme approach, definition of what good looks
19 like and confirmation that the Programme will be run by
20 Gayle Peacock."
21 Who in particular do you recall inputting into these
22 terms of reference. It says the programme board but was
23 there anyone who was particularly active or particularly
24 involved?

25 A. No, I think it would have been shared with all the
116

1 stakeholders as well, you know, if you're named in the
 2 document you should see it, so I think they would have
 3 all seen it plus Paula and Angela.

4 **Q.** Did you ultimately produce a report arising from these
 5 terms of reference?

6 **A.** I can't recall specifically an end report. I know there
 7 was reports in terms of some of the measures on
 8 a regular basis, so some of the things that you
 9 mentioned in the table above in terms of how things were
 10 tracking. I remember producing those on a monthly
 11 basis. I don't know what the end, if there was an end
 12 report. I finished on maternity leave before the
 13 programme actually finished.

14 **Q.** Are you aware of recommendations having been made?

15 **A.** Yeah, so there was a number of recommendations. So
 16 there was the Branch User Forum, which was implemented,
 17 there was the investigations team which was the --
 18 I can't remember the term that was used but this was
 19 like the investigative function to look at the losses.
 20 There was the recommendation to implement the case
 21 management system. HORice came out of the back of this
 22 as well, which we talked about earlier. There was some
 23 tactical changes that were made in terms of things like
 24 remittance slips were changed because one side didn't
 25 look like -- there was a pick list versus what the

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1 triggered by threatened litigation or something else?

2 **A.** I can't remember why they were initiated. They were
 3 just asked to participate obviously with looking at
 4 improvements that could be made for that purpose.

5 **Q.** Were you aware, for example, of the Justice for
 6 Subpostmasters Alliance around this stage, 2013?

7 **A.** Yeah, in terms of how it was, you know, on the back of
 8 the Second Sight work that was being done.

9 **Q.** So this is the 2 October. You're mentioned there under
 10 "Network".

11 **A.** Yeah.

12 **Q.** If we turn to page 3, please. They all follow a similar
 13 layout, so let's say we have "Nelson" there. What does
 14 that mean?

15 **A.** That would have been a particular branch that was Nelson
 16 Post Office.

17 **Q.** It says there:
 18 "GP [I think that's yourself] has provided the discs
 19 to Helen Rose."
 20 Do you recall this at all?

21 **A.** I recall conversations about Nelson Post Office branch.
 22 I'm assuming that those were motor vehicle licence discs
 23 that had been returned, I think, the only thing that
 24 would be discs.

25 **Q.** Do you know who Helen Rose was?

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1 branch would rem in, which was confusing.

2 So there were tactical things, there were duplicate
 3 receipt changes, so there were a number of things that
 4 were done rather than just wait for the end report but
 5 I can't remember the end report as such because I didn't
 6 produce it.

7 **Q.** Do you know who produced it?

8 **A.** I don't know if there was one.

9 **Q.** Can we look at POL00043369. I am going to start to go
 10 through these Bond Dickinson reports.

11 **A.** Okay.

12 **Q.** Can you tell us the context of those reports?

13 **A.** So these were the notes that were taken from a weekly
 14 meeting, so there was a number of business stakeholders
 15 that took part in the calls. They were chaired by Bond
 16 Dickinson and Legal Services, and the purpose was to
 17 understand if there was any branches or issues or
 18 technical issues that the business actually needed to be
 19 aware of. So it was actually, you know, were there any
 20 calls coming to NBSC that we were aware of? Was there
 21 anything that was being raised to myself or through
 22 other channels that the business needed to be aware of
 23 and make sure that the branches issue was actually being
 24 resolved by the appropriate person.

25 **Q.** Was it triggered by the Second Sight report? Was it

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1 **A.** Helen Rose worked in the fraud investigations team.

2 **Q.** Do you remember her writing a report about Horizon?

3 **A.** I have seen it's referred to in the additional
 4 documents. I haven't seen that report.

5 **Q.** You didn't see it at the time?

6 **A.** No.

7 **Q.** Then it says:
 8 "GP made the point that the Horizon issues had
 9 already been dealt with and those should not have been
 10 raised at the visit."
 11 Do you remember that? Are you able to assist us at
 12 all?

13 **A.** Yeah, I think -- so this was a case that the business
 14 were already communicating with, so I think this was one
 15 that like the case review team were looking at in terms
 16 of different things that could be causing the
 17 discrepancies. I can't recall what visit that alludes
 18 to, I'm assuming that somebody went out to the branch.
 19 Yeah, that's really the only thing I can remember for
 20 that.

21 **Q.** We'll continue going through those documents but before
 22 I do I just want to bring to your attention POL00029677
 23 and that is what we know as the Detica report of
 24 1 October 2013?

25 **A.** Yeah.

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1 Q. So we're in October. This was a document that was in
 2 your pack. Have you ever seen this before?
 3 A. I can remember reading it because I think, as part of
 4 the input it mentions the non-conformance team, which
 5 would have been the branch standards team. So I can
 6 remember, I think, the Detica team did come and speak to
 7 I think it was some of my team in terms of the data
 8 sources that we used, particularly for branch standards.
 9 So I think I did see this at the time.
 10 Q. Can we look at page 11. We have there in the top
 11 paragraph it summarises the Second Sight report and what
 12 they thought of the Second Sight interim report. It
 13 says:
 14 "The initial findings of Second Sight were published
 15 during the Pilot. The review was prompted by a public
 16 campaign by [subpostmasters] who felt they had been
 17 traduced by the Post Office following losses at their
 18 branches. Several of Second Sight's observations
 19 resonate strongly, notably the disjointed response by
 20 the Post Office and the habitual desire to assign
 21 responsibility to an individual rather than to conduct
 22 root cause analysis to close gaps persisting across the
 23 branch network. In order to have a consistent approach
 24 across the [subpostmaster] estate, it is vital that Post
 25 Office has the ability to robustly identify and monitor
 121

1 A. Not how Horizon was performing itself. I think there
 2 was the acknowledgement that the system integration and
 3 the multiple systems wasn't easy but I don't think we
 4 read that as that undermined Horizon itself.
 5 Q. The references to the Second Sight report that I took
 6 you to earlier and about concerns about not conducting
 7 root cause analysis to close gaps persisting across the
 8 branch network, and things like that, that didn't cause
 9 any concerns relating to the Horizon System?
 10 A. No, I don't think so.
 11 Q. Can we look at POL00043370. It's another one of those
 12 meetings, 9 October. In that first box we have mention
 13 of:
 14 "Helen to see if she can link transactions to
 15 specific time. GP to report update in due course."
 16 Was that Helen Rose again?
 17 A. Yes, it was, yeah.
 18 Q. Do you recall what this might be talking about at all?
 19 A. I think Helen must have been looking to see if there was
 20 any investigation that she was doing. I'd have asked
 21 her to undertake an investigation for the press brief,
 22 to see if there was any information that she could
 23 provide.
 24 Q. If we go over to page 2 and it's the bottom of page 2
 25 that I'd like to look at. Andy Hayward from Security.
 123

1 anomalous behaviour, so the appropriate corrective
 2 action can be taken (whether this is tactical education,
 3 enhanced training, process or system redesign or
 4 audit/investigation)."
 5 That's something you would have read at the time.
 6 A. Mm-hm.
 7 Q. Again, I mean did that cause you any concern about, for
 8 example, having conducted those appeals in relation to
 9 terminations? Did you begin to have any concerns about
 10 the Horizon System?
 11 A. Not on the Horizon System itself, no.
 12 Q. If we can look at page 37 and 7.2.2, "Complex and
 13 fragmented systems":
 14 "Post Office systems are not fit for purpose in
 15 a modern retail and financial environment. Our primary
 16 concern here relates to difficulty in reconciling
 17 information from multiple transaction systems both in
 18 terms of timeliness, structure and access."
 19 Are you aware of this report having caused anyone,
 20 for example those who attended those meetings
 21 Deloitte -- with Bond Dickinson, sorry, any concerns
 22 about the Horizon System.
 23 A. I don't think so. I don't think this report sort of
 24 highlighted any problems with Horizon.
 25 Q. So you didn't read that as being related to Horizon?
 122

1 Is this the person who was reporting a particular issue?
 2 A. Yes, it would have been, yes, so the person on the left
 3 is the person who is speaking.
 4 Q. So:
 5 "2004 -- Carluke Post Office -- Police prosecution
 6 believed to have happened. Blaming Horizon at the time.
 7 Elaine Doram SPM passed away. Husband blaming Horizon
 8 and making noise through Scottish Parliament. Email
 9 details to forwarded. No information due to time lapse.
 10 No records available. No further enquiries at this
 11 stage."
 12 Was there, at this stage -- so we're still October
 13 2013 -- any questioning amongst those who attended these
 14 meetings or amongst the senior leadership of the safety
 15 of those kinds of prosecutions?
 16 A. That wasn't discussed on this call, no.
 17 Q. It's referring to a 2004 case, so was it looking back or
 18 was it because somebody had called --
 19 A. The purpose of the call was obviously to -- you know,
 20 any conversations that were being had, so Andy would
 21 have raised that as part of this weekly meeting to say
 22 this issue has now been raised and, actually, as the
 23 business, you need to be aware that the case from 2004
 24 has now been raised and people are starting to talk
 25 about it again.
 124

1 Q. Was nobody querying at that meeting or at the series of
2 meetings, any concern about the reliability of
3 convictions?
4 A. We didn't discuss it.
5 Q. At this meeting and at many of the meetings you have
6 people from the legal team, so Rodric Williams, Jarnail
7 Singh, Martin Smith of Cartwright King, Kayleigh
8 Harding. You'll have seen in your pack that there was
9 advice given by a barrister, Simon Clarke, on 15 July
10 2013 --
11 A. Yes.
12 Q. -- so before these meetings took place. I don't need it
13 to be brought on screen but, for the purpose of the
14 transcript, it's POL00006357. That raised serious
15 questions about expert advice that can be given in
16 prosecutions.
17 A. Yes.
18 Q. Were you aware of that at this time?
19 A. I'd never seen that report until you sent it. I was
20 aware that they were stopping the prosecutions but
21 I didn't know the reason why.
22 Q. Martin Smith of Cartwright King, for example, or Jarnail
23 Singh, did any of them ever mention Gareth Jenkins, for
24 example, at any of those meetings?
25 A. It was mentioned that he was the expert witness that was
125

1 are lots and lots of meetings. This is a very intense
2 period of --
3 A. It was weekly, yeah. I can't remember for how long but
4 it was every Wednesday for a number of months.
5 Q. Do you know who instigated them?
6 A. I think it was Security, I think.
7 Q. So they had asked for this series of meetings to take
8 place?
9 A. Yeah, and I presume it was on the back of obviously
10 having seen the information about the disclosure
11 document in the pack, that this was deemed to be the
12 right forum to make people aware of what was going on in
13 the business.
14 Q. When you say disclosure, do you mean the Simon Clarke
15 advice?
16 A. Yes.
17 Q. So you hadn't seen the advice?
18 A. No.
19 Q. Were you aware of it?
20 A. No.
21 Q. Were you aware of some other purpose for the meetings?
22 You've drawn the link between the Simon Clarke advice
23 and the meetings, can you now reflect on it and think
24 that there was a link?
25 A. Having now seen the document, I now view it differently
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1 often used in prosecutions but, other than that, Gareth
2 wasn't discussed.
3 Q. So there was no mention of any concern about the
4 reliability of his evidence?
5 A. No.
6 Q. What was the general attitude of those present when
7 things like Carluke Post Office were bought up? Was
8 there some scepticism?
9 A. Um, I don't think so. I can't --
10 Q. The reason I ask is the way it's phrased here, "Husband
11 blaming Horizon and making noise through Scottish
12 Parliament". Making noise is a phrase that cropped up a
13 couple of times.
14 A. It's derogatory, yeah, because they don't believe it,
15 I guess -- I don't know why they would have used that
16 phrase. The notes were written as somebody said it but
17 I can understand how that's interpreted that, yeah,
18 there's a cynical view that it's been made noise.
19 Q. How did that kind of language sit with, for example, the
20 Branch Support Programme that had been going on, a more
21 listening approach, perhaps, to branches, the branches'
22 concerns?
23 A. I didn't pick up on that at the time and I perhaps
24 should have.
25 Q. Can we look at POL00043371. 16 October now. So there
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1 to how I did before. Before my view was actually we
2 just needed to get these branch issues resolved, (a)
3 know about them and (b) do something about it. Now,
4 having seen the documents that led to it, it puts
5 a slightly different view on it.
6 Q. We have there attending this meeting security Dave
7 Posnett.
8 A. Mm-hm.
9 Q. Is he someone you knew well?
10 A. Yeah, I knew him reasonably well. He worked, I think,
11 in the fraud team in Security.
12 Q. If we turn to page 2, about halfway down in the
13 left-hand column you have the name "Martin Griffiths"?
14 A. Yes.
15 Q. It says there "DP", that's presumably Mr Posnett?
16 A. Yes.
17 Q. "... No further details on Horizon issue. SPM passed
18 away."
19 Were you aware that Mr Griffiths was terminated in
20 the summer of 2013 and on 23 September 2013, he
21 committed suicide and on 11 October, so just shortly
22 before this meeting, his life support machine had been
23 turned off.
24 A. I think this was -- I was aware of -- that he'd
25 attempted to commit suicide. I think this was the
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1 meeting where it was confirmed that he had passed.

2 **Q.** So there was discussion at these meetings of

3 Mr Griffiths having --

4 **A.** Passed away.

5 **Q.** It says "passed away" there but the actual background,

6 was that discussed. So that the link, for example, to

7 Horizon, was any link drawn between his suicide and

8 Horizon?

9 **A.** We knew that, I think, obviously there was claims being

10 made at the time.

11 **Q.** What was the attitude at this meeting: condolences,

12 concern or business as usual?

13 **A.** Well, it's obviously condolences as well. It's never

14 nice when somebody passes away.

15 **Q.** But was that the atmosphere at the meeting? Was

16 there -- it may strike people as a significant moment in

17 time, in the history of Horizon. Did it strike anybody

18 on that occasion as significant or not?

19 **A.** I think it would have done, I can't particularly

20 remember the instances of this particular call.

21 **Q.** If we go down, please, to South Darent:

22 "Question as to whether NBSC properly capturing

23 complaint."

24 Not in relation to this particular incident but just

25 speaking more broadly, were there concerns that the NBSC

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1 **A.** I think Rodric was just reinforcing the fact that, as

2 soon as anybody mentions any concerns, actually we need

3 to know about it.

4 **Q.** If we scroll down on this page, please, there is

5 an entry there with "GP" on the left-hand side at the

6 bottom. It says:

7 "Rodmill -- issues log amalgamated. Complaint sent

8 before Second Sight came into play. Direct to Paula."

9 Are you able to tell us what you think that meant?

10 **A.** I think that would have been a complaint that would have

11 gone into Paula before the Second Sight work had

12 actually been commissioned.

13 **Q.** So are you aware -- and we will come on to this because

14 I know you were part of the executive correspondence

15 team -- but did subpostmasters and others send

16 complaints direct to Paula Vennells?

17 **A.** Yes.

18 **Q.** Where would they go from there, typically?

19 **A.** It would depend on what the complaint was about. So it

20 was usually, depending on the nature of the complaint

21 that it was raised, it would be taken up with the senior

22 manager responsible for that department. So if it was

23 a Post Office kept closing, it would be the regional

24 manager. If it was a stock or cash issue, it would be

25 supply chain. If it was branch accounting, it would go

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1 weren't properly capturing complaints?

2 **A.** I think so and that was one of the things that we were

3 looking at as the Branch Support Programme, is how can

4 you get advisers to -- because I think it was quite

5 apparent that people were just putting "KB", so you'd

6 look at like a call log history into the Network

7 Business Support Centre to try to find at what had

8 happened and there were instances where the adviser was

9 putting "KB" which referred to Knowledge Base. So they

10 weren't actually recording in some instances what had

11 been said to the postmaster and this was the work that

12 we were trying to do with them, because actually when

13 you're trying to look at a case, KB isn't a useful piece

14 of information to work out what happened or what was

15 told to the subpostmaster to try and rectify any

16 problem.

17 **Q.** Do you know how long that had been going on for? Is

18 that a historic problem, a long lasting problem?

19 **A.** I think it was fairly historic, yes.

20 **Q.** If we scroll down over the page it says:

21 "RW -- Once Horizon disputed, it needs to be

22 flagged. SPM to be questioned as to where discrepancy

23 exists. To prevent further issues in debt recovery

24 process."

25 What do you understand that to mean?

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1 to the head of branch accounting, and they would be

2 responsible for investigating the complaint and then

3 providing a resolution.

4 **Q.** It says:

5 "Complaint cited many issues with Horizon. Stock

6 reconciliation, numbers do not match and challenged.

7 Recording of 1st and 2nd class label sales. Not clear

8 whether this has been investigated."

9 Is this something you remember, this particular

10 incident?

11 **A.** I can't remember this but I think it would have been

12 triggered by the executive correspondence team.

13 I didn't manage them at the time but they would have

14 approached us, based on the work we were doing and

15 saying, "You need to have a look at this one because we

16 think that's got further evidence."

17 **Q.** If we scroll over the page, it says:

18 "GP to look into which branches with complaints that

19 have not been dealt with and report back."

20 **A.** Yeah, so that would have been going through the logs

21 with the executive correspondence team, so they captured

22 all of the complaints that were fed to Paula. So I'm

23 assuming with that it would have been looking back on in

24 any historic records and seeing if there were any

25 similar ones that had been overlooked.

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1 Q. Thank you.
 2 I'm going to move on to POL00040066. If we could
 3 zoom in on the top there, it says:
 4 "Post Office Limited, Initial Complaint Review and
 5 Mediation Scheme, Overview of Horizon and Branch trading
 6 practices."
 7 Can you tell us the background to this document?
 8 A. I can't remember the document but obviously I must have
 9 input it at some point because my name is on there.
 10 I think it was produced on -- in preparation for the
 11 mediation process or there were a number of branches
 12 that were going through that process to try to reach
 13 an agreement on, you know, how to resolve their case.
 14 I think this was various information that was put
 15 together to try to give the mediator some knowledge
 16 about Post Office branches and the types of issues that
 17 they may have.
 18 Q. Do you remember the period. I don't think it's dated,
 19 this is a draft?
 20 A. I think this would have been about 2014, I think.
 21 Q. Thank you. If we look at page 23, we have there
 22 a section entitled "Possible reasons for balance
 23 discrepancies". I'll wait for it to be brought up on the
 24 screen. As you said, it has your name here.
 25 A. Yeah.

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1 A. Well, yeah, we would have included something -- if we'd
 2 known there was the possibility of error, it should have
 3 been included in there.
 4 Q. During your discussions with Ms van den Bogerd in
 5 relation to this chapter, or whatever we might call it
 6 in this document, did she ever mention to you the
 7 possibility of bugs, errors and defects as being
 8 a possible reason for a balance discrepancy?
 9 A. No.
 10 Q. I'd like to look at your statement, please. I don't
 11 have many questions left, just so we're clear for
 12 timing. Your statement is WITN06160100 and it's
 13 paragraph 124, I'm going to give you the page number.
 14 Page 42. So 124 you're talking I think about the HORICE
 15 system?
 16 A. Yeah.
 17 Q. Then 125, you say:
 18 "The processes followed and improvements that
 19 I identified were based on the assumption that the
 20 Horizon System could not cause discrepancies and cash
 21 shortfalls. Had I known then about the issues with the
 22 system and the impact it could have had, then this would
 23 have completely changed my approach to the processes
 24 I was involved with."
 25 You're talking here, I think, about 2014 and the

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1 Q. It seems as though you co-wrote this with Angela van den
 2 Bogerd or certainly --
 3 A. Collated some information or something, yeah.
 4 Q. Do you know who would have written it or who would have
 5 taken the lead with it? Would it have been you or
 6 Ms van den Bogerd?
 7 A. It was possibly me, I think. As I say, I can't recall
 8 writing it but because my name is on there, I must have
 9 input it at some point.
 10 Q. You previously explained that Ms van den Bogerd was --
 11 had detailed knowledge of the Second Sight report --
 12 A. Yes.
 13 Q. -- but at this stage you didn't?
 14 A. Yeah, I hadn't seen it.
 15 Q. If we look down, these are reported as possible reasons
 16 for balance discrepancies. If we scroll down, the first
 17 is a "Mis-key" so that's a staff entering the wrong
 18 value. Over the page, "Connectivity", next, "Cheque
 19 handling". Next, "Staff actions". There wasn't, in any
 20 of this explanation of possible reasons for
 21 discrepancies, any mention of bugs, errors or defects
 22 with Horizon?
 23 A. No.
 24 Q. Having seen the interim Second Sight report now, are you
 25 surprised that that wasn't mentioned?

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1 work you carried out in 2014.
 2 A. Yeah.
 3 Q. So as at 2014, despite working closely with Angela van
 4 den Bogerd, you still, at that stage, weren't aware of
 5 the fact that the Horizon System could cause
 6 discrepancies --
 7 A. No.
 8 Q. -- in cash shortfalls. I mean, looking back at that now
 9 and considering that in what you now know, are you
 10 surprised that you didn't know and can you come up with
 11 an explanation as to why you think you didn't know and
 12 weren't told?
 13 A. I don't know, really. Whether it's because the Post
 14 Office didn't believe that it could be an issue, so
 15 discounted it. I don't know.
 16 Q. If we scroll down to paragraph 129, that's page 43, you
 17 say:
 18 "Even when the claims about Horizon started to be
 19 known within the business, the messaging coming from the
 20 business was that the system was not capable of
 21 impacting the accounts. I made the assumption that the
 22 business had undertaken the relevant due diligence",
 23 et cetera.
 24 A. Yeah.
 25 Q. You refer to the business. Are you able to tell us who

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1 in the business you considered that messaging to be
 2 coming from?
 3 **A.** Well, it was evident in, you know, sort of the way that
 4 the group exec was talking. You know, you've seen some
 5 from the comms from Tony Jamasb, those kinds of
 6 statements that was what was just in the business, that
 7 was the language that was being used.
 8 **Q.** Where in particular do you think that message was coming
 9 from? Who in particular was that message coming from?
 10 **A.** I would assume that that would be board.
 11 **Q.** Anybody particularly? I mean, the board is made of
 12 a number of people.
 13 **A.** But I don't think anybody can just do that one message.
 14 It's got to be -- the board have got to agree to those
 15 messages. You know, when you're communicating something
 16 so serious, I don't think it can just be one person that
 17 says, "This is what it is". Everybody who is -- is
 18 communicating that message at the board level needs to
 19 sign up to that.
 20 **Q.** Anybody in particular within the board that you felt was
 21 driving that message?
 22 **A.** Well, I think -- well, I don't know. I've no evidence
 23 to suggest who it would be, you know.
 24 **Q.** I'm going to move on to the Branch User Forum. I think
 25 you've said it was established in 2014 and arose as part

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1 a Saturday, you know, completely disagreeing with some
 2 of the, you know, the information that I was telling
 3 him, and then that was the extent that I stopped my
 4 communication with him.
 5 **Q.** What do you recall of the concerns that he was raising?
 6 **A.** I can't remember the specific time but I think, you
 7 know, it was obviously -- he wanted to make some
 8 improvements to the way the Post Office was operating,
 9 which was absolutely fine. I think he'd had an IT
 10 background, I think, from what I can recollect, and
 11 I think he wanted to make some, obviously, some
 12 suggestions and improvements. I think that's what his
 13 general sort of response was about.
 14 **Q.** If it's suggested that he was excluded from the user
 15 forum by Angela van den Bogerd, would you agree or
 16 disagree with that?
 17 **A.** I think I'd probably partially agree. I think if there
 18 were some concerns, you know, constructive criticism is
 19 absolutely fine. I think there was some -- I don't
 20 know, if it was going to be a challenging discussion,
 21 you'd want to make some outputs. I think I'd probably
 22 agree with that statement.
 23 **Q.** Looking back now at how serious everything in fact was,
 24 do you think it was a mistake to exclude him from that
 25 forum?

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1 of that work that you had been carrying out.
 2 **A.** Yes.
 3 **Q.** Who formed part of that forum?
 4 **A.** So it was group of subpostmasters. So I think there was
 5 a communication that went out to branches that invited
 6 people to participate, and then they would literally
 7 just apply, and a decision was made. Angela chaired it
 8 I think the first time it was set up. I think there was
 9 about six to seven postmasters, and then in 2017, when
 10 Angela moved on to a different role, I took it over.
 11 And we invited people to apply again, and took a range
 12 of postmasters.
 13 **Q.** Do you remember a subpostmaster called Tim McCormack?
 14 **A.** I do.
 15 **Q.** Do you recall any particular interaction with him?
 16 **A.** Yes.
 17 **Q.** Can you tell us about it?
 18 **A.** So Tim wanted to be part of the Branch User Forum. He
 19 was quite vocal. I'd conversations with him.
 20 I understood, you know, some of his concerns, some of
 21 his frustrations. And we had perfectly decent
 22 conversations and I think -- I can't remember what
 23 happened, but then I think I stopped communicating with
 24 him because the messages to myself became quite
 25 aggressive. So I would get texts messages on

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1 **A.** I don't think anybody with -- should be excluded if, you
 2 know, if they've got suggestions to make. I think there
 3 was probably some disagreements over behaviours.
 4 **Q.** At paragraph 92 of your witness statement you also refer
 5 to feedback sessions. Are they separate to the Branch
 6 User Forum, or are they something different, or ...
 7 **A.** Yeah, so this was separate. So on the back of -- you
 8 know, in order to validate, there was some of the
 9 findings. Myself and Anne, who worked with me at the
 10 time, in order to sort of gauge what some of the issues
 11 were, there was a number of people around the business
 12 that we spoke to, and postmasters. So this was on the
 13 back of the thematic issues that had come out in terms
 14 of training and support. So it was very much about, you
 15 know, what could we do differently? What ideas have you
 16 got? Et cetera, et cetera.
 17 **Q.** You refer to a range of stakeholders. Are you able to
 18 tell us -- give us a little bit more detail?
 19 **A.** Yeah, so it would have been postmasters. Basically
 20 anybody who had direct intervention with postmasters.
 21 So I spoke to Network Business Support Centre advisers,
 22 contracts advisers, field support trainers and auditors,
 23 people in Product and Branch Accounting, security
 24 advisers, the National Federation of SubPostmasters.
 25 People who had that interaction themselves.

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1 Q. You mentioned the NFSP. Were there any other unions,
2 such as the Communications and Workers Union?
3 A. No, it was just the National Federation of
4 SubPostmasters.
5 Q. Any reason why it was them in particular?
6 A. I think there was discussions internally around, you
7 know, the National Federation of SubPostmasters was the
8 recognised union of the postmasters. I don't think the
9 Post Office recognised the CWU formally as the union of
10 postmasters, therefore we weren't encouraged to talk to
11 them.
12 Q. The final topic that I have is the Executive
13 Correspondence Team. That seems to be from 2015,
14 I think, when you were head of Branch and Customer
15 Support.
16 A. Yeah.
17 Q. Can you give us a flavour of the kinds of correspondence
18 that subpostmasters and their assistants or managers
19 made in relation to bugs, errors and defects in Horizon,
20 how early were they corresponding on those issues in
21 your time? How often?
22 A. I can't remember any specifically. I don't know if
23 there was a process that was set up with Legal Services
24 because of the potential litigation that we almost
25 didn't deal with those, if that makes sense. I think it

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1 that off.
2 Q. I think you've said that typically, the letters about
3 bugs, errors and defects would go to the legal team?
4 A. I think they did, yeah.
5 Q. Was that an instruction from somebody?
6 A. I think that probably would have come from Legal
7 Services. So Jane MacLeod and her team, I think it
8 probably would have been, at the time.
9 Q. So do you recall an instruction from them that if people
10 are communicating about bugs, errors and defects, they
11 should send them to them, rather than to deal with them
12 within your team?
13 A. I can't be 100 per cent sure, but the fact that I can't
14 remember dealing with any would suggest that that's what
15 happened. That's my recollection. But I can't be a
16 hundred per cent sure.
17 Q. Thank you. Finally, could we just have a look at
18 paragraph 146 of your statement so WITN06160100.
19 Page 49. It says:
20 "My experience of working in the Post Office was
21 that it operated within a strict risk control framework
22 and there were processes in place for making decisions.
23 Any change to policy, approach, request for funding,
24 etc, had to be signed off at the highest levels,
25 sometimes including a shareholder, and it did not appear

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1 was one of those where if that was where it was flagged,
2 I think they were put to the Legal Department. I can't
3 be 100 per cent sure, but I think that that -- based on,
4 obviously, what was going on at the time, I think it had
5 been agreed that that's the process that would follow.
6 So we didn't attempt to respond to those ones. That
7 would go to Legal Services.
8 Q. Typically, in relation to correspondence, how would you
9 interact with the CEO or other executives? I mean, did
10 you have a direct line to them? Would you raise
11 significant issues with them?
12 A. Yeah, you could ask to speak to, you know, anybody at
13 whatever time. They needed to be aware, especially if
14 they'd been written to, because it was usually that
15 person would say "Can you respond to that one?" Because
16 sometimes they would go to their personal email address
17 which they'd pick up, and then it would end up being
18 back with the correspondence team, or it would be via an
19 MP or whatever. But yeah, you could approach any of the
20 board members. And, you know, if there was a particular
21 one that -- in the main, they were happy that you were
22 dealing with those issues, but if there was
23 a particularly sensitive one then the door was always
24 open to have that discussion. And especially if you
25 were writing back in somebody's name, they had to sign

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1 that individuals could make decisions in isolation or
2 outside of their remit. Before the separation of Post
3 Office from Royal Mail Group, there were internal
4 processes for approvals, and then this would go to the
5 Royal Mail boards for further approval. Once decisions
6 had been made and strategies agreed, this then filtered
7 down into individual objectives at every level in the
8 organisation. It wasn't an environment where you could
9 just do what you wanted if you felt like it."
10 Was it an environment where it was difficult to
11 speak out?
12 A. Um, I think it depended on the individual. I personally
13 didn't feel as though -- you know, if I'd an issue,
14 I felt that I could raise it. I think some people felt
15 they couldn't, for whatever reason. There was the
16 whistleblowing line. There were sensitive cases that
17 people did speak out that, obviously they went to the
18 Executive Correspondence Team, that I was privy to,
19 because obviously it was my team that they were
20 responding to. So people were raising issues. People
21 were encouraged to say what they think. Whether it was
22 agreed with is a different matter, but I, on a personal
23 level, didn't feel like I could not raise something.
24 Q. We've looked at, for example, the Second Sight report
25 that wasn't shared with you. Was there, in respect of

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1 bugs, errors and defects, information that was kept from
 2 you, do you think, intentionally?
 3 **A.** I don't know. And I've reflected on this, obviously,
 4 since you sent the information. And, you know, when
 5 you're asked a question in the statement, "Well, why
 6 were you selected to do the Branch Support Programme?",
 7 the positive side of me goes: because I thought I had
 8 the right skills to do the job. Having seen some of
 9 this stuff, the cynical part of me goes: well, was
 10 I picked because I would do what I was told? I don't
 11 know. I trusted the people that I worked for.
 12 I accepted the information that was in good faith.
 13 So I didn't -- I don't know what they kept from me.
 14 I wouldn't like to think that we were deliberately doing
 15 that, but I couldn't -- unless you asked them. I don't
 16 know.
 17 **MR BLAKE:** Thank you very much, Ms Peacock. I don't have
 18 any further questions.
 19 I think there is a small number of questions.
 20 **SIR WYN WILLIAMS:** Yes, I am anxious that the transcriber
 21 shouldn't be asked to continue unless it really is just
 22 five or ten minutes, maximum. All right.
 23 **MR JACOBS:** Sir, I think I'll be five minutes.
 24 **SIR WYN WILLIAMS:** Nobody else?
 25 **MR BLAKE:** Ms Page?

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1 the hearings when the subpostmasters gave evidence last
 2 year?
 3 **A.** No.
 4 **Q.** Well, her evidence was read in to the record on 16 March
 5 2022, and just as a whistlestop summary, she was
 6 a subpostmaster with three branches in Newcastle, and
 7 she paid over £10,000 in relation to alleged shortfalls.
 8 Post Office demanded another £20,000 off her in relation
 9 to further alleged shortfalls, and she was a victim of
 10 cyber fraud as a result of the Horizon System being
 11 vulnerable, she says, to hackers, and the Post Office
 12 held her liable for the recovery of that theft by third
 13 parties in the sum of £33,000.
 14 **A.** Is this the MoneyGram one?
 15 **Q.** The MoneyGram one.
 16 **A.** Right.
 17 **Q.** Do you remember?
 18 **A.** I do, yes. Yes.
 19 **Q.** Shall we go, then, to Ms Saddiq's statement, and that is
 20 at WITN02230100. Page 7 of 16, please. Thank you.
 21 That's on screen. So if we look at paragraph 32, you'll
 22 see, as you correctly say, the MoneyGram transfer?
 23 **A.** Yes.
 24 **Q.** She was initially told that only her branch was affected
 25 but later it was accepted that it affected 11 other

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1 **MS PAGE:** I mean, if I were 10 minutes, then -- I don't
 2 think I will be but --
 3 **SIR WYN WILLIAMS:** I think we will just take a few minutes'
 4 break so that the transcriber can just have a short
 5 rest, and she's not very well. We'll come back again at
 6 quarter past, and then we'll be as swift as we can be.
 7 How about that?
 8 **MR BLAKE:** Thank you.
 9 **(3.06 pm)**
 10 **(A short break)**
 11 **(3.16 pm)**
 12 **SIR WYN WILLIAMS:** Mr Jacobs.
 13 **Questioned by MR JACOBS**
 14 **MR JACOBS:** Thank you, sir.
 15 Ms Peacock, good afternoon. I represent 156
 16 subpostmasters, who instruct Howe+Co, who instruct me.
 17 You told Mr Blake earlier on this afternoon that a lot
 18 of your career was spent providing support to
 19 subpostmasters; is that right?
 20 **A.** Yes.
 21 **Q.** You also said, when you were asked about unprofessional
 22 conduct of auditors, you couldn't remember any examples?
 23 **A.** Not that had been raised to me.
 24 **Q.** I want to ask you about within of our clients, Shazia
 25 Saddiq. I don't know if you've followed the Phase 1 of

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1 branches, she says. My client's evidence is, at
 2 paragraph 34, that the Post Office wrote to her and told
 3 her that it would be holding her responsible for the
 4 losses calculated at nearly £34,000.
 5 **A.** Mm-hm.
 6 **Q.** So if we could then go to paragraph 35, which is the one
 7 I particularly wanted to ask you about. So she says
 8 that on 20 August 2014, she met with Rachel Lax and you,
 9 and you described yourselves as Post Office internal
 10 investigators. You reviewed her personal finances in
 11 detail to determine what payments she could afford to
 12 make towards this sum of money that was stolen, she
 13 said, while at the Horizon System. So do you recall
 14 that meeting?
 15 **A.** I do, actually. I can't recall -- I think I would have
 16 said "I'm investigating the issue." I don't think would
 17 have said "I'm an investigator", but I do remember the
 18 meeting, yeah.
 19 **Q.** Well, then, we'll move on to what Ms Saddiq has to say
 20 about the meeting, which is over the page at paragraph
 21 36, please. So she says:
 22 "This was a deeply humiliating experience, as they
 23 were looking through all my personal bank and other
 24 records. And this was done in a public area of Holiday
 25 Inn Hotel. As they looked at my records, they made

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1 comments about where I bought my children's shoes from.
 2 This was none of their business. I was also embarrassed
 3 as I lived very humbly; I spent as little as I could on
 4 myself and maintaining my family, so it was humiliating
 5 to have strangers pore over my personal accounts in
 6 public and see how little I spent on myself and my
 7 children."

8 I want to ask you some questions about that. Why
 9 was the meeting held in a public area in a hotel?

10 **A.** Because that's where she requested it to be held.

11 **Q.** We understand that this is where you suggested it was to
 12 be held?

13 **A.** I didn't know the area at the time, and I asked to meet
 14 at her branch, and this was where she suggested that we
 15 meet.

16 **Q.** Did you think it was appropriate to ask her to go
 17 through personal detail in a public area?

18 **A.** In hindsight, probably not. At the time she didn't
 19 mention it, but then I guess she probably -- if she felt
 20 that she couldn't raise it to me. I'm really
 21 disappointed that I've had that effect on her. I didn't
 22 know that.

23 **Q.** If we go to paragraph 37, please, you'll see she goes on
 24 to say:

25 "At the end of this humiliating meeting where it was
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1 **Q.** Can we go to paragraph 39. She subsequently had
 2 a breakdown as a result of the pressure that the Post
 3 Office were putting her on.

4 **A.** Okay.

5 **Q.** The question that Ms Saddiq wants me to ask is: do you
 6 accept that this was insensitive and unprofessional as
 7 a way to behave towards a businessperson?

8 **A.** Yes, if that's the -- yeah.

9 **Q.** Now, you said earlier on in your evidence that you
 10 weren't aware of any complaints that had been made in
 11 relation to audits. I just want to ask you; a number of
 12 our clients gave evidence in the Phase 1 hearings and
 13 they said that the Post Office adopted a tactic,
 14 seemingly, of humiliating them in public. Shahnaz
 15 Rashid and Heather Earley talk about surprise audits
 16 where auditors marched into their branches that were
 17 full of customers, and closed the branches down, and
 18 Katherine McAlerney talks about "aggressive questioning"
 19 of her in front of her customers.

20 Are you aware of auditors and investigators adopting
 21 these tactics when there investigating subpostmasters?

22 **A.** I think, when we did the review on the Second Sight,
 23 I think there was the feedback that some of the security
 24 team were maybe being a bit too masculine in the
 25 approach, and aggressive in terms of, you know, as you

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1 made clear that I had no money to pay the Post Office to
 2 make up for the crime (the MoneyGram cyber attack) that
 3 had been perpetrated against my Post Office, the
 4 investigators said they would put a charge on my
 5 properties. They said this as though they were doing me
 6 a favour."

7 Do you recall that?

8 **A.** There was some discussion internally about the whole
 9 MoneyGram issue anyway, in terms of the number of
 10 branches that were affected. There was sort of
 11 a decision around who would be held liable, what the
 12 approach would be. We did talk about how her business
 13 was performing, and her income levels. I'm not going to
 14 deny that. I knew that that was an approach that the
 15 Post Office could take. I don't think we ended up going
 16 down that route. That's not my interpretation of the
 17 meeting, but if that's what she said, then that's what
 18 she said.

19 **Q.** You've said just now that -- and the transcript keeps
 20 jumping around -- you've said that you regret that it
 21 had this effect on her?

22 **A.** Mm.

23 **Q.** Do you regret the way you and your colleague conducted
 24 this meeting, in light of her evidence now?

25 **A.** If that's how it made her feel, then yes.

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1 delve into some of the feedback and ask people about
 2 their experience, that did come to -- you know, there
 3 was a feeling, but I didn't have any specific --
 4 I couldn't give you a branch, for example, to say this
 5 one was raised with me.

6 **Q.** You, I think, were taken by Mr Blake to paragraph 129 of
 7 your statement. I don't think we need to turn it up.
 8 Well, I know you've got it, because I can see it there,
 9 so perhaps we will turn it up. You say:

10 "Even when the claims about Horizon started to be
 11 known within the business, the message coming from the
 12 business was that the system was not capable of
 13 impacting the accounts."

14 The question that my clients have asked me to ask
 15 you is, looking back now -- and I know, just
 16 interjecting, that you talked about comments where
 17 people were saying that subpostmasters were making noise
 18 and you said there was a cynical attitude. Looking
 19 back, do you accept that the Post Office's refusal from
 20 the top to countenance the possibility of errors led to
 21 a high-handed and unprofessional treatment of
 22 subpostmasters by auditors and investigators?

23 **A.** I didn't experience that personally, but I could see how
 24 that was correct in some cases.

25 **Q.** That the view from the top led to the mindset of the

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1 investigators in this way?
 2 **A.** Um, yeah, I think it was -- you know, a dismissive
 3 approach will filter down.
 4 **MR JACOBS:** I just need to ask to see if I've got any more
 5 questions to ask you. Thank you. I haven't got any
 6 further questions.
 7 **SIR WYN WILLIAMS:** Ms Page?
 8 **Questioned by MS PAGE**
 9 **MS PAGE:** Thank you. I also represent some subpostmasters.
 10 You've told us that you were aware of the
 11 discontinuance of prosecutions?
 12 **A.** Mm-hm.
 13 **Q.** End of 2013 going into 2014?
 14 **A.** Yes.
 15 **Q.** How did you come to know about that?
 16 **A.** That was just discussed as part of the Branch Support
 17 Programme, the conversations with Angela. We were
 18 obviously working with security and Legal Services quite
 19 heavily as part of that -- as the programme saw, I was
 20 made aware that, you know, it was pausing, given
 21 everything else that was going on.
 22 **Q.** When you say "everything else that was going on", what
 23 do you mean by that?
 24 **A.** So, you know, obviously the Second Sight review, the
 25 claims that were being made. That kind of stuff. The

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1 fact that actually bugs could do it. So I can now see
 2 the reason why the prosecutions had stopped: because
 3 there was the potential that the prosecutions were
 4 unsound.
 5 **Q.** Then, during those conversations with Ms van den Bogerd
 6 and the security people -- by which you mean presumably
 7 Mr Posnett, do you?
 8 **A.** No, Mr Scott. It will be John Scott who was head of
 9 Security at the time.
 10 **Q.** John Scott. Did either of them ever mention to you the
 11 idea that there might be a litigation risk that needed
 12 to be notified to POL's insurers?
 13 **A.** No, I can't remember that.
 14 **Q.** Just sticking with Mr Clarke's advices for a moment, in
 15 your pack from the Inquiry -- you've had two, haven't
 16 you?
 17 **A.** Yes.
 18 **Q.** You've had the one which relates to Mr Jenkins and the
 19 one which relates to the minuting of the weekly Horizon
 20 meetings.
 21 **A.** Yes.
 22 **Q.** That second one, about the minuting of the Horizon
 23 meetings, albeit you didn't see it at the time, were you
 24 aware at the time that there was an issue around the
 25 minuting and the keeping of the minutes?

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1 view that I got was, you know, that it wasn't
 2 appropriate to continue prosecuting, and that was
 3 a message which you accepted.
 4 **Q.** When you said it just now, you said "pausing". Was that
 5 something you understood at the time? Was that the way
 6 it was being expressed, or was it going to be stopped
 7 completely?
 8 **A.** I don't think anybody had made a decision. I knew we
 9 weren't going to, but I didn't know -- I didn't get the
 10 impression -- I didn't know whether it was permanent at
 11 the time, or whether it was pausing, or whether it was
 12 stopping.
 13 **Q.** When you had those conversations, do you remember if
 14 that came from Angela or from Security, or both?
 15 **A.** I think it came from both.
 16 **Q.** Now that you've seen the documents from Mr Simon Clarke
 17 you've drawn a line between that and the discontinuance
 18 of prosecutions. Can you just help us with your
 19 reasoning there and your conclusion? Why have you drawn
 20 that line?
 21 **A.** What do you mean by "draw the line"?
 22 **Q.** You said, "Now I've seen the documents from Mr Clarke
 23 I can see why they stopped the prosecutions". What
 24 makes you say that?
 25 **A.** Well, because I think that they hadn't disclosed the

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1 **A.** I think when, obviously -- because I think Bond
 2 Dickinson undertook the note-keeper roles. I think
 3 there was a paralegal involved in the weekly meetings,
 4 and I think when -- because it varied week on week.
 5 I think it was mentioned at the start why the paralegals
 6 had basically to make sure that it was fully documented,
 7 and I think that was the extent of which it was
 8 introduced.
 9 **Q.** So you weren't aware at any time that there was an issue
 10 around the keeping of those minutes or the keeping of
 11 them securely?
 12 **A.** No.
 13 **Q.** The representatives from security. Second Sight had
 14 found at this stage that there was a focus in security
 15 on asset recovery solutions without further establishing
 16 the underlying root cause of the problem.
 17 **A.** Mm-hm.
 18 **Q.** Is that something you would have recognised at the time
 19 if you had have been told about it?
 20 **A.** Sorry, what do you mean by that?
 21 **Q.** If you'd have read that Second Sight report which had
 22 that finding in it, is that something that would have
 23 chimed for you at the time, knowing the people that you
 24 knew from Security, Dave Posnett, Rob King?
 25 **A.** Yes.

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1 Q. Then on Mr Griffiths, after that meeting that we've
2 looked at the note of, did you hear any more about him
3 from Ms van den Bogerd?
4 A. So I think they attended the funeral of Mr Griffiths.
5 I think there was -- I can't remember if Angela
6 attended. I think Anne Allaker did attend on behalf of
7 Post Office. And they were talking to the family.
8 I don't know the ins and outs of the conversations. And
9 that was the extent of the knowledge on that particular
10 case.
11 Q. So you didn't hear anything about a settlement made to
12 the family?
13 A. No. I presume it might have gone through mediate -- one
14 of the mediation cases, potentially, but I can't confirm
15 that.
16 Q. On the Detica report, would you accept it was covering
17 some of the ground that you were given to look at in the
18 Branch Support Programme?
19 A. Yes.
20 Q. Was it given to you with that in mind, as it were?
21 A. I think it was. I think it was to sort of -- I think
22 the Detica report, it was -- they were trying to do
23 a business case to actually progress Detica into the
24 business. And I think I saw it to see if there were
25 themes that we were picking up. But yeah, I think it

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1 Second Sight's recommendations whilst actually blocking
2 or impeding those investigations?
3 A. I can see how you make that interpretation. I think my
4 perspective of it, I felt, you know, there was a genuine
5 need and requirement to change some of the things that
6 were given to us. I genuinely believed that that wasn't
7 paying lip-service. I think in some ways, the Second
8 Sight report in that aspect gave momentum to some of the
9 feelings that, you know, were known. I don't think the
10 issues that we were looking at were actually paying
11 lip-service. I think people, you know, genuinely wanted
12 to change those areas. I don't think it was as
13 a distraction, not -- I don't know why they didn't
14 consider the Horizon stuff as seriously as they did, but
15 I genuinely believed that they wanted to change things
16 for the better.
17 Q. At the time?
18 A. At the time.
19 Q. Looking back?
20 A. I don't ... the cynical part of me says yes, maybe
21 a little bit, but I think it was too much hard work for
22 it to completely be, like, dismissed and a sop. I think
23 the genuine -- you know, to improve things for
24 postmasters was there. Whether you want to accept that,
25 that's entirely up to you. I personally believe that

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1 was just to substantiate some of the issues. Some of
2 the stuff in the Detica report wasn't surprising.
3 Q. Would you accept it was quite a critical report?
4 A. Yes.
5 Q. In light of that, is it perhaps a bit surprising that it
6 wasn't mentioned in any of the Branch Support Programme
7 documentation? It wasn't discussed more widely?
8 A. In what way? The issues? Because the Detica report
9 didn't seem to have a lot of recommendations.
10 Q. The issues that they found, the problems that they
11 found?
12 A. Um, I think we probably did discuss them. Whether it's
13 been documented or minuted, I'm not sure, but we were
14 definitely aware of them.
15 Q. Just finally, with the benefit of hindsight, and
16 I appreciate what you've been quite sort of careful
17 about thinking about things in terms of at the time and
18 hindsight, this is specifically a hindsight question.
19 Do you think that, given that the Second Sight review
20 was sort of rather filleted for you, if I can put it
21 that way, that it -- the bits that were filleted out and
22 given to you for the Branch Support Programme to look
23 at, do you think that was really a sort of a sop from
24 POL Management, to seem as if they were taking the
25 concerns seriously? To seem as if they were acting on

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1 the genuine belief was there to do it. Given some of
2 the, you know, not everybody in -- those stakeholders
3 mentioned on that agenda I think genuinely did believe
4 that we should change things. I think some of them did
5 pay lip-service to the programme. And part of what we
6 were trying to do, we came across challenging
7 conversations with people to try to get them to believe
8 that. I think we wouldn't have gone through some of
9 those arguments and disagreements had we not genuinely
10 believed that we absolutely had to change the training
11 and support for postmasters.
12 **MS PAGE:** Thank you. Those are my questions.
13 **SIR WYN WILLIAMS:** Thank you for providing a detailed
14 witness statement. Thank you for coming to give oral
15 evidence.
16 **THE WITNESS:** You're welcome.
17 **SIR WYN WILLIAMS:** Right. 10.00 tomorrow morning, Mr Blake.
18 **MR BLAKE:** Thank you very much, sir.
19 **(3.36 pm)**
20 **(The hearing adjourned until 10.00 am the following day)**

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I N D E X

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