

Wednesday, 18 October 2023

(12.00 noon)

MR STEVENS: Good morning, about to be good afternoon, sir. Can you see and hear me?

SIR WYN WILLIAMS: Yes, I can. Before you go any further can I ascertain from you how we propose the rest of the day should pan out? My kind of provisional view was that we'd have a lunch break at more or less the normal conventional time and then an afternoon break does that coincide with how you see it going?

MR STEVENS: Precisely sir, yes.

SIR WYN WILLIAMS: Fine. All right, thank you.

MR STEVENS: In which case, may I call Mr Alan Lusher.

ALAN KENNETH LUSHER (affirmed)

Questioned by MR STEVENS

MR STEVENS: Thank you, Mr Lusher. My name is Sam Stevens and, as you know, I ask questions on behalf of the Inquiry. Please could I ask you to state your full name.

A. Alan Kenneth Lusher.

Q. Thank you for giving evidence today and thank you for the detailed witness statement which you've already provided. I want to turn to that

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It's fair to say, is it, that the majority of your career at the Post Office was spent either in the Audit Team or as a Contract Adviser?

A. Yes, that's right.

Q. You joined the Post Office in 1982?

A. Yes.

Q. I think you initially started working in Crown Office branches?

A. Yes, that's right.

Q. Then you became an Auditor at postal officer grade conducting audits of sub post offices?

A. That's right, yes.

Q. Then you worked in the Audit Team with promotions until around 2002, I believe?

A. Just referring to my statement there, it would be around 2002, yes.

Q. Shall we bring that up. If we bring up your witness statement at page 2, paragraph 5, please. Thank you, at the bottom it's an incomplete list but we have a list of roles which was, I think, generated from an HR system held by Post Office. We see you were Audit Team Leader East until 2002. Then, below that, you moved into the Security team as a Security Team

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now and I see you do have a bundle of documents in front of you?

A. I do.

Q. Do you have your witness statement to hand?

A. Yes.

Q. For the purposes of the -- that's dated 10 May, I should say, of this year. For the purposes of the record it's referenced WITN05830100. Can I ask you, please, to turn to page 49 of that statement?

A. Yes, sir.

Q. You'll see it runs to 176 paragraphs.

A. Yes.

Q. At the bottom, do you see your signature?

A. Yes.

Q. Can I ask you to confirm that the facts stated within that statement are true to the best of your knowledge and belief?

A. Yes, they are.

Q. Thank you. That stands as your evidence to the Inquiry. I'm going to ask you a few further questions and I'm going to start with some background, summarising your career at the Post Office, before discussing some parts in more detail.

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Manager.

A. Yes, that's right.

Q. My understanding is, while you were in the Security Department in that role, you were dealing with cheque fraud, predominantly?

A. It was product fraud with the overall remit of the team and I specifically looked after cheque encashment fraud at that time.

Q. That was presumably customers of Post Office rather than subpostmasters themselves?

A. That's absolutely right, yes.

Q. If we can go over the page, please, subparagraph (i), you refer to a role between 2003 and 2005: RLM. Later in your statement I think you say that was a sales role; is that correct?

A. Yes, that's broadly the role of the Retail Line Manager.

Q. You pre-empted my question. Then we have Manpower Planning, but at (k), from October 2005 the C&SM 16, does that stand for Contract and Services Manager?

A. Yes, indeed. Really, the title Contract Adviser or Contract Manager can apply from that date onwards.

Q. I see. So right through until -- if we can go

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1 down just slightly, please -- right down until
 2 you finish at the Post Office in August 2019.
 3 All of those, effectively, the role of
 4 a Contract Adviser?

5 **A.** With some differences, from around 2010, the
 6 line (p) there, Commercial Contract Adviser,
 7 I was doing a slightly different job still
 8 within the contracts role but not log after
 9 subpostmaster contracts directly and,
 10 thereafter, I was involved in looking after the
 11 contracts for what we referred to the multiple
 12 partners, partners such as Tesco, One Stop and
 13 McColls, and so on, and those partners that
 14 large numbers of post offices each and so the
 15 means of managing the contract was somewhat
 16 different.

17 **Q.** With these larger firms, from 2012 onwards,
 18 presumably you'd have a contact at, say, Co-op
 19 or whoever it is?

20 **A.** Yeah.

21 **Q.** You would deal with them and then that person or
 22 someone within Co-op would deal with the
 23 individuals at the --

24 **A.** In general, that would be the way it went
 25 forward, yes.

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1 Rivenhall is mentioned in the documents and
 2 I think that was the first case I came across
 3 when the integrity of the Horizon system was
 4 questioned. We were -- "we" being the team of
 5 Contracts Advisers -- were repeatedly advised by
 6 Post Office Limited that there was nothing to be
 7 concerned about with the Horizon system and the
 8 integrity was complete.

9 **Q.** When you say you were advised by Post Office
 10 Limited, who in particular gave you that
 11 assurance?

12 **A.** Well, the discussion came up in team meetings on
 13 a fairly regular basis. Not exactly sure of the
 14 dates because that's so long ago but from the
 15 first inklings of difficulties in what
 16 2004/2005, something like that, right through to
 17 the end, there was kind of a continuum. Things
 18 got -- the pressure increased, as it were.
 19 Initially, there's not too much consideration
 20 given to it but, latterly, the Post Office
 21 issued us with a statement to read out at
 22 application interviews, which the Legal team had
 23 prepared, to assure people that the Horizon
 24 system was sound. And so, you know, latterly,
 25 given -- well, you asked me to speak up to 2012,

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1 **Q.** That document can come down, thank you.
 2 I'm going to focus primarily on your period
 3 of dealing with subpostmasters when you were
 4 a Contract Adviser and also when you were in
 5 audit. Before then, I want to look at some
 6 points on reliability -- perhaps we took that
 7 document down too soon, if we could go back to
 8 it at page 49, paragraph 175, please. Thank
 9 you.

10 If we could start at 175. Thank you. This
 11 is at the end of your statement and you say:

12 "At the time of the introduction of the
 13 system and consistently throughout the time when
 14 groups of SPMs were questioning the robustness
 15 of the Horizon system, my colleagues and I in
 16 the Contracts team were assured of its complete
 17 reliability. I was assured that the Horizon
 18 system was not capable of causing
 19 discrepancies."

20 How often did you discuss the reliability of
 21 Horizon or its ability to cause discrepancies
 22 while you were an Auditor or Contract Adviser.

23 **A.** I think I'd be right in saying, sir, that, as
 24 an Auditor, the matter never arose and, as
 25 a Contract Adviser, I'd made -- the case

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1 didn't you?

2 **Q.** Well, no, do go on for latterly, please?

3 **A.** Well, latterly, the concern obviously increased.
 4 As just an ordinary member of the public
 5 watching the BBC documentary on the case, and so
 6 on, we became rather concerned and things
 7 changed in the team, in that the decision-making
 8 roles moved up the food chain, as it were,
 9 senior managers had to make decisions which had
 10 been previously made, perhaps, by Contracts
 11 Advisers, and so concern grew for myself and
 12 when I had the opportunity to leave the
 13 employment of Post Office Limited, I therefore
 14 took it.

15 **Q.** I'm therefore going to come back to that issue
 16 of matters moving up the seniority in a moment.

17 **A.** Thank you.

18 **Q.** When you say this message of assurance came in
 19 team meetings, where do you think the source of
 20 it was from? Was it more senior management or
 21 was it within your team?

22 **A.** Senior management. All the issues to do with
 23 Horizon, to the best of my knowledge, were dealt
 24 with by senior management.

25 **Q.** Again, are you able to identify anyone in

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1 particular who was -- who passed the message on
2 to you that Horizon couldn't cause
3 discrepancies?

4 **A.** Well, my team leader in the final years was
5 Keith Bridges, before that Lin Norbury.

6 **Q.** Was that Steve Bridges?

7 **A.** Keith.

8 **Q.** Do forgive me.

9 **A.** Sorry.

10 **Q.** And Lin Norbury?

11 **A.** Yeah.

12 **Q.** This belief that Horizon was not capable of
13 causing discrepancies, how did it affect the way
14 you approached subpostmasters who said they had
15 a discrepancy that they couldn't explain?

16 **A.** Well, initially, it made it very difficult to
17 understand their point of view. We were given
18 the assurances that the system could not cause
19 errors and, when a subpostmaster came along and
20 said the system caused errors, obviously that's
21 very difficult to balance up, isn't it? So it
22 was difficult for us to hear and understand the
23 complaint of the subpostmaster but any such
24 complaint from my perspective would have been
25 passed to the accounting people in Chesterfield,

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1 of that, yeah.

2 **Q.** Why would it have been helpful?

3 **A.** It would have been helpful because it would have
4 cast doubt on the integrity of the Horizon
5 system.

6 **Q.** In your statement, page 12, please,
7 paragraph 41, I should say as background, you
8 were asked -- as you say in your statement, you
9 were given two Rule 9 requests, one of which
10 asked open questions with very little, if any,
11 documents and the other one was more targeted,
12 providing further documents. Paragraph 41,
13 I believe, is a response to the first request.

14 You're asked about your recollection of
15 errors or issues within the Horizon system and
16 you refer to the Rivenhall branch, which you've
17 mentioned already just earlier?

18 **A.** Yes.

19 **Q.** What, in particular, stood out about this issue
20 and the Rivenhall branch as to why you
21 remembered it?

22 **A.** The subpostmaster was Mr Ward and I recall him
23 being quite clear in interview in saying that
24 the Horizon system -- or there'd been figures
25 input into his account, into the Horizon system,

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1 who would be able to help out with the details
2 of the Horizon implications.

3 **Q.** You've mentioned it earlier and you say in your
4 statement about SPMs complaining as to the
5 reliability of the Horizon IT System.

6 **A.** Yes.

7 **Q.** Did you ever have cause to doubt that Horizon
8 was incapable of causing discrepancies?

9 **A.** No, given the reassurances from the company
10 until much later, sort of 2015 onwards, then
11 I thought the Horizon system, the integrity, was
12 complete.

13 **Q.** The Inquiry has heard evidence that people
14 within Post Office were aware of bugs, errors
15 and defects within the Horizon IT System, for
16 example the Inquiry has heard evidence of Post
17 Office employees being aware of a bug, called
18 the Callendar Square bug, in at least 2006, that
19 caused regular discrepancies in branches for
20 years?

21 Do you think Contracts Advisers should have
22 been made aware of such bugs, errors and
23 defects.

24 **A.** I've never heard of that bug or defect before
25 and, yes, it would have been helpful to be aware

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1 therefore, which were not of his doing.

2 **Q.** Well, let's bring up a document related to that,
3 please. It's POL00117650 and if we could start
4 at page 2, please. You see there this is
5 an email from you, Alan Lusher, at the signature
6 at the bottom. If we could just go back up on
7 to page 1, sorry, to get the time -- thank
8 you -- 15 October 2008 to Andrew Winn, and then
9 back to page 2, please.

10 You say that you attach notes of the
11 interview to the email. We don't have copies of
12 those notes or the Inquiry doesn't have copies
13 of those notes but you set out two issues raised
14 by Mr Ward and the first is, as you say, a claim
15 that:

16 "... on a number of occasions figures have
17 appeared in the cheques line of his account. He
18 suspects these have been input to his account
19 electronically without his knowledge or
20 consent."

21 Was that the first time someone had made
22 an allegation like that to you or had you heard
23 something like that before?

24 **A.** As far as I can recall, that was the very first
25 occasion that I'd come across such a statement.

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1 Q. Mr Ward gave evidence in Phase 1 of the Inquiry,
 2 which looked at Human Impact, so the evidence
 3 was going to how the scandal affected him. One
 4 of the points he raised is about these repeated
 5 discrepancies in the cheque line between April
 6 2006 and September 2008. In his witness
 7 statement, he said that you told him that he was
 8 the only one experiencing these issues in his
 9 interview. Do you think that's something you
 10 would have said or do you recall saying that?
 11 A. I don't recall saying that in 2008 but, given
 12 that it was the first occasion that I'd come
 13 across such a thing, it could have been the
 14 case, though I think it rather unlikely, to be
 15 honest. Could I also just say that, you know,
 16 I read the statement that Mr Ward made and it's
 17 very distressing, the results of the -- all
 18 this, the results on him personally. I have
 19 great sympathy towards Mr Ward. He suffered
 20 quite a lot.
 21 Q. Can we just go to page 1, please, now, of this
 22 email. This is Mr Winn's response. To point
 23 (1), he says:
 24 "The only way [Post Office] can impact
 25 branch accounts remotely is via the transaction

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1 Of course, Andy then goes on to say that
 2 such a casual accusation could be extremely
 3 serious to the business, if there was, in fact,
 4 changes to the Horizon system made without the
 5 consent of the subpostmaster.
 6 Q. What, if anything, did you do to investigate
 7 whether, in this case, there had been use of
 8 this remote access to affect Mr Ward's branch
 9 accounts?
 10 A. I don't believe I took any further action on
 11 this, accepting the fact that the changes
 12 couldn't have been made to the Horizon system.
 13 Q. Did you tell Mr Forward about Fujitsu's ability
 14 to insert data into the branch accounts without
 15 his -- sorry, insert data into the branch
 16 accounts?
 17 A. I don't recall but probably not.
 18 Q. Why not?
 19 A. Because, at that stage, I would be content
 20 myself that the changes couldn't be made to the
 21 Horizon system and, therefore, there must have
 22 been another explanation for the discrepancies
 23 in the account.
 24 Q. Well, what it says here is that changes could be
 25 made to the system but there were rigorous

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1 correction process."
 2 That's something we'll come to cover briefly
 3 later on. He goes on to say, towards the end of
 4 that paragraph:
 5 "Fujitsu have the ability to impact branch
 6 records via the message store but have extremely
 7 rigorous procedures in place to prevent
 8 adjustments being made without prior
 9 authorisation -- within POL and Fujitsu."
 10 Was that the first time you were aware of
 11 Fujitsu's ability to do as it says, to impact
 12 branch records via the message store?
 13 A. Yes, it would be the first time.
 14 Q. What did you make of that at the time?
 15 A. I'm pleased that you brought this document
 16 forward because, essentially, it's me asking
 17 an expert on the Horizon system how to proceed
 18 with this unusual allegation and Andy Winn, as
 19 the expert, has come back and said basically
 20 that there are extremely rigorous procedures in
 21 place to prevent adjustments being made and so
 22 my reaction to that was, well, there must have
 23 been some other cause because we really ruled
 24 out the Horizon system as being the problem
 25 here.

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1 controls in place?
 2 A. Indeed.
 3 Q. So for cases such as Mr Ward's and any cases
 4 going forward, did you consider it to be
 5 important to ascertain whether those controls
 6 were being upheld when there were unexplained
 7 discrepancies?
 8 A. No. I assumed that they were being upheld.
 9 Q. In terms of this general knowledge of the
 10 ability for Fujitsu to impact branch records,
 11 was this common knowledge amongst Contracts
 12 Advisers?
 13 A. I don't know.
 14 Q. Thank you. That document can come down.
 15 I'm going now to go to audit and I want to
 16 start broadly by looking at the role of the
 17 Auditor. Is it a fair summary that an Auditor's
 18 role was to check whether cash and stock
 19 holdings in a branch matched the figures
 20 recorded on the latest account?
 21 A. Broadly, that is indeed exactly right.
 22 Q. Leaving to one side the sources of information,
 23 did that role remain the same before and after
 24 the introduction of Horizon?
 25 A. Yes, it did.

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1 Q. Was the role of an Auditor to understand the
2 reason for why a discrepancy arose?

3 A. That's more difficult because there would be
4 some investigation by the Audit Team to
5 establish the reason for a discrepancy,
6 a discussion with the subpostmaster normally,
7 which may result in the fact that he had some
8 local knowledge, that the lottery scratch cards
9 are kept in a different drawer, or something
10 like that, which hadn't been disclosed to the
11 Auditor, which would resolve the problem -- nine
12 times out of ten would resolve the problem but,
13 occasionally, of course, that would be left in
14 the air.

15 So there was some discussion with the Audit
16 Team to understand the cause of an audit but
17 basically their role was to report on the facts.

18 Q. Going back quite a way now to when you started
19 as an Auditor, do you recall if there were any
20 minimum qualifications or minimum experience
21 required in order to be appointed as an Auditor
22 for Post Office?

23 A. A degree of experience in sub office -- in --

24 Q. Sorry, I missed that?

25 A. Sorry, a degree of experience, perhaps, with

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1 communicating those things to the budget holders
2 and probably not of interest to the Inquiry, to
3 be honest.

4 Q. So it's then you go back to the Audit Team as
5 a team leader?

6 A. Yes.

7 Q. Again, was there any particular qualification or
8 experience you needed to become a team leader?

9 A. No, there was no formal qualification required.

10 Q. I should just -- I think it's clear -- put it:
11 as a team leader you would supervise other
12 Auditors?

13 A. Yes.

14 Q. Very briefly, you've referred already to
15 regions, and the Inquiry has heard evidence that
16 in pre-'99, Audit Teams were organised
17 regionally. Then in 1999, following a review,
18 the service was effectively brought under
19 a national structure; does that ring true to
20 you?

21 A. I don't recall the dates very well, being so
22 long ago but, broadly, that is what happened,
23 yes.

24 Q. Can you recall whether that change, from
25 regional processes to national process, was in

19

1 working with sub offices was desirable but there
2 were no formal requirements for qualifications.

3 Q. So working on the counter or as a manager in
4 a sub post office?

5 A. That would certainly help, yeah.

6 Q. Do you recall what, if any, training you
7 received?

8 A. The training would have been working with other
9 Auditors.

10 Q. In your statement you say in 1988 you were
11 promoted and took the role of Management
12 Accountant still within the Audit Team?

13 A. No.

14 Q. Sorry, was that --

15 A. The Management Accountant role was separate to
16 the Audit Team.

17 Q. I see. My apologies. So what was a Management
18 Accountant's role?

19 A. The Management Accountant in the area that was
20 working at the time, I believe it was the
21 Norwich Head Post Office area, probably, or the
22 Anglia district -- it was the Anglia district.
23 The role of the Management Accountant there was
24 to do with budgeting, monitoring budgets,
25 producing performance statistics and

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1 any way linked to the introduction of Horizon?

2 A. I don't believe it was linked to Horizon.

3 Q. Were there any changes to the audit process,
4 from your region, when your region moved into
5 the national region?

6 A. No, there were no fundamental changes to the
7 audit process, apart, perhaps, from the way the
8 Auditors were planned -- the audits themselves
9 were planned; there was greater reliance on risk
10 management.

11 Q. The Inquiry has heard evidence that the number
12 of Auditors reduced, as well, following the
13 nationalisation; is that correct?

14 A. That was a steady reduction in the number of
15 audits from the time I joined until the time
16 I left the Audit Team, yes.

17 Q. To what extent, if at all, do you think that
18 affected Auditors' relationships with
19 subpostmasters?

20 A. Well, the audits became less frequent at offices
21 that were running without any difficulties and
22 more frequent at offices that did have some
23 degree of -- or high degree of risk, shall
24 I say, rather than difficulty.

25 Q. The reporting line for Auditors was moved into

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1 the Security Department; do you recall that?

2 **A.** Yes.

3 **Q.** The Security Department was responsible for
4 investigating allegations of criminal conduct
5 within the Network?

6 **A.** Yes, I believe Tony Marsh was in charge of the
7 Security Department at the time, they were kind
8 of separate wings of operation that he managed.

9 **Q.** Please could you explain the difference in
10 practice between the role of an Auditor and the
11 role of an Investigator?

12 **A.** Yes. I think we've described the role of
13 an Auditor already, in that they produced the
14 facts, the numbers, resulting probably in
15 a discrepancy. The Investigation Team would be
16 looking at the result of the audit and
17 considering the possibility of a criminal
18 investigation, usually either concerning theft
19 or false accounting.

20 **Q.** So would it be fair to say that -- how the
21 system was designed at least, Auditors were
22 supposed to be doing a neutral fact-finding
23 exercise, whereas Investigators would be
24 evaluative in determining whether on the facts
25 they believed there was criminal conduct?

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1 Team was there as well?

2 **A.** I can't recall any specific examples, I'm sorry.

3 **Q.** On times when Investigators weren't there,
4 please could you just summarise when an Auditor
5 would engage the Investigation Department?

6 **A.** Yes. Once a discrepancy had been confirmed in
7 the account, then the Auditor would normally
8 contact the Contract Adviser first, although
9 there would also be attempts to contact the
10 Investigation Department, possibly. So there
11 was three people involved there or three parties
12 involved and, if the Contract Adviser had
13 concerns had there may be criminal activity,
14 then the Investigation Team would be alerted.

15 **Q.** Was that for any discrepancy --

16 **A.** No, no.

17 **Q.** -- or discrepancies of a certain level?

18 **A.** Generally, the Contract Manager wouldn't be
19 advised of discrepancies less than £1,000 or so,
20 unless there was an admission of falsification
21 of accounts or theft, and the Investigation
22 Team, their parameters changed over time, to the
23 extent wherein, latterly, there were far fewer
24 investigations and virtually no criminal
25 prosecutions with an emphasis on the recovery of

23

1 **A.** That's exactly right.

2 **Q.** Was there any difference in practice once
3 Auditors moved under the purview of the Security
4 team?

5 **A.** No.

6 **Q.** The Inquiry has heard evidence that
7 Investigators and Auditors would, on occasion,
8 attend branches together at the same time?

9 **A.** Yes.

10 **Q.** So you do recall that?

11 **A.** Yes.

12 **Q.** Why did that happen?

13 **A.** The Investigation Team would ask for an audit to
14 be completed at a particular branch because
15 there were concerns at that branch there may be
16 a shortage or something amiss.

17 **Q.** Do you see any problems with Investigators
18 attending with Auditors for what is
19 an apparently neutral exercise in an audit?

20 **A.** The Investigators wouldn't have had a role to
21 play in that visit to the office until
22 a discrepancy was discovered -- disclosed,
23 rather than discovered.

24 **Q.** I mean, in those circumstances, would
25 subpostmasters be aware that the Investigation

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1 lost funds.

2 But if we go back to, I don't know,
3 2005/2010 then, if there was any kind of
4 admission or a larger loss with less likelihood
5 of recovery, then the Investigation Team would
6 be advised. On occasions, they would visit the
7 office there and then, if they were able to, so
8 that they were there while the Auditors were
9 still there, which enabled them to conduct
10 investigations very effectively.

11 **Q.** You said then in your evidence if there was
12 admission or if there was a large loss where
13 recovery may have been more difficult --
14 paraphrasing you there -- why would the
15 difficulty of recovering the amount of money on
16 the discrepancy be relevant to whether or not
17 Investigators should investigate whether there's
18 been criminal conduct?

19 **A.** Yes, that's a very good point that you raise
20 there and perhaps I was wrong in saying that
21 that would be -- unless there was a very large
22 sum of money involved, in which case
23 an investigation would be worthwhile, even if
24 there was no criminal case to follow.

25 **Q.** Again, when you say you were wrong in saying

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1 that, did that then actually reflect the
 2 thinking at the time, though, that Auditors
 3 would take into account the difficulty of
 4 recovery as to whether or not they would refer
 5 it on to the Investigation Team?
 6 **A.** I believe I was probably wrong in saying that
 7 a few moments ago. An Auditor would be
 8 concerned if there was a large sum of money
 9 involved, tens, hundreds of thousands of pounds
 10 perhaps, and may, at that stage communicate with
 11 the Investigation Department.
 12 **Q.** Earlier you referred to £1,000, a number we'll
 13 see and come to in respect of suspensions, do
 14 you know where the figure of £1,000 being picked
 15 as a relevant figure for referral was?
 16 **A.** I don't know whether that was empirically based
 17 or just a convenient figure, I don't know.
 18 **Q.** But that was effectively what Auditors worked
 19 to, was it?
 20 **A.** Mm, yeah.
 21 **Q.** Very briefly on the conduct of audits, we don't
 22 need to turn it up, but in paragraph 91 of your
 23 statement you say audits would generally be
 24 performed when the branch was closed. I take
 25 from that that sometimes they would be performed

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1 paper-based cash account was based.
 2 **A.** Yes.
 3 **Q.** The subpostmaster who did the analysis and put
 4 together the cash account would be there to
 5 answer any questions about how that account was
 6 put together?
 7 **A.** Not necessarily but, normally, that would be the
 8 case, yes.
 9 **Q.** Yes. But let me put it another way. If the
 10 subpostmaster was there, they would be able to
 11 answer questions on how the account was put
 12 together?
 13 **A.** Yes, that's right.
 14 **Q.** Now, the introduction of Horizon, the cash
 15 account was generated automatically by the
 16 computer?
 17 **A.** Yes.
 18 **Q.** What training did you receive in Horizon as
 19 an Auditor?
 20 **A.** I honestly can't remember, it was so long ago.
 21 There wouldn't have been very much training and
 22 the Auditor wouldn't have to interact with the
 23 Horizon system very much at all during the
 24 process of an audit. It was the starting
 25 figure, which was important, which would be

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1 when the branch was open?
 2 **A.** Yes. The normal thing was to try to arrive at
 3 the office before opening time and get access to
 4 the cash and stock, so that an audit could at
 5 least be started before the public had access to
 6 the Post Office and, therefore, service
 7 disruption was minimised.
 8 **Q.** The Inquiry has heard evidence from
 9 subpostmasters that some Auditors would carry
 10 out audits while the shop was open --
 11 **A.** Yeah, yeah.
 12 **Q.** -- which made them feel humiliated in public.
 13 Are you aware of any complaints at the time made
 14 by subpostmasters as to audits being carried out
 15 in public while the shop was open?
 16 **A.** I can't remember any specific examples but
 17 I could understand a subpostmaster feeling like
 18 that.
 19 **Q.** We've mentioned earlier, looking at audits
 20 again, that, pre-Horizon, the audit would be
 21 done on a cash account that was done on
 22 a paper-based system?
 23 **A.** Yes.
 24 **Q.** At an audit, the Auditor and the subpostmaster
 25 could consult all the data upon which the

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1 produced, presumably printed out on the last
 2 account, which would be the starting point for
 3 the audit. And so there wouldn't be very much
 4 interaction between the Auditor and the Horizon
 5 system.
 6 **Q.** So the process we referred to before of when it
 7 was a paper-based system, you may ask quick
 8 questions of the subpostmaster as to how the
 9 account was generated and questions here and
 10 there about that. The Auditor couldn't do that
 11 with the Horizon system, in that the Auditor
 12 couldn't interrogate how the cash account was
 13 generated; do you agree with that?
 14 **A.** No, I don't think I can agree with that. The
 15 basis of the account was still available on the
 16 Horizon system or by talking to the
 17 subpostmaster. I mean vouchers may still be on
 18 hand, which can be checked; obviously the cash
 19 and stock was still there under a manual system
 20 before Horizon; then some of the vouchers would
 21 have been sent away and so couldn't be checked
 22 and, similarly, under the Horizon system.
 23 The key difference, I guess, is that under
 24 the Horizon system, many of the transactions or
 25 increasing numbers of the transactions were

28

1 dealt with entirely electronically.

2 **Q.** Let's put it another way. As an Auditor, do you
3 recall what reports you had access to which
4 Horizon could generate?

5 **A.** My time as a hands-on Auditor was almost
6 entirely pre-Horizon and so I was managing the
7 Audit Team for much of the Horizon time and so
8 I didn't have that level of expertise within the
9 Horizon system itself. I can't recall the
10 reports that were called off. There was
11 an office snapshot, which was crucial to the
12 audit because that would highlight and list the
13 cash and stock on hand, enabling the Auditor to
14 check what was on hand against some figure from
15 the account.

16 **Q.** The Inquiry is very familiar with ARQ audit
17 data, which is data held by Fujitsu, which was
18 the basis for prosecutions in many cases and
19 shows activity on the Horizon system. As
20 an Auditor, your team wouldn't have had access
21 to ARQ data in the branch, would they?

22 **A.** As far as I can recall, I haven't heard of ARQ
23 data before.

24 **Q.** If there was a discrepancy in the set of branch
25 accounts that was caused by a bug, error or

29

1 rights access?

2 **A.** No.

3 **Q.** No. Okay, I want to move on now to dealing with
4 contracts and your time as a Contract Adviser,
5 so this is 2005 onwards. Again, were there any
6 minimum requirements in respect of the
7 qualifications or experience required by someone
8 before being appointed as a Contract Adviser?

9 **A.** No, there were no specific requirements of that
10 nature.

11 **Q.** Did you receive any training upon being made
12 a Contract Adviser?

13 **A.** Again, it would be working with experienced
14 Contracts Advisers. There were -- there was
15 training during that time for all Contracts
16 Advisers, just to enhance skills.

17 **Q.** To what extent did you receive any training in
18 Human Resources?

19 **A.** I'm qualified as a Master of Business
20 Administration from the Open University and had
21 some experience of human resource management
22 through that but I can't recall anything
23 specifically from the Post Office.

24 **Q.** Did the Post Office provide any training on how
25 to conduct disciplinary procedures -- I should

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1 defect in the Horizon IT System, do you accept
2 that, as an Auditor, you wouldn't be able to
3 determine that the discrepancy was caused by
4 a bug, error or defect?

5 **A.** Yes, that's true.

6 **Q.** This may not apply to you because of your
7 evidence that you weren't dealing hands-on with
8 audits at the time but I'll ask anyway in case
9 you have knowledge of it. When Horizon was
10 implemented, were you aware of a tool that would
11 allow Auditors to insert transactions into a set
12 of branch accounts without the subpostmaster's
13 knowledge?

14 **A.** Absolutely not. The Auditors would not be able
15 to amend the subpostmaster's accounts.

16 **Q.** If I say the words "global user rights", does
17 that mean anything to you?

18 **A.** Global user rights, that would mean that
19 somebody could access the system with presumably
20 a password and had rights to every aspect of the
21 system.

22 **Q.** Do you recall Auditors having -- sorry, I should
23 rephrase that question.

24 Do you recall, in your time as an Auditor,
25 when going into a branch, having global user

30

1 say, sorry, to Contracts Advisers?

2 **A.** Disciplinary procedures?

3 **Q.** Yes, so if someone was accused of misconduct,
4 for example a subpostmaster is accused of theft
5 or false accounting --

6 **A.** I think -- correct me if I'm wrong, but
7 I believe disciplinary procedures refers to
8 employment law. The subpostmasters weren't
9 employed by the Post Office; they were under
10 contract for services.

11 **Q.** There's no issue between us there. I take that.
12 It's just a question of whether or not, as
13 a Contract Adviser, you received any training on
14 how to handle a procedure where you were
15 determining whether a subpostmaster was
16 responsible for misconduct?

17 **A.** There was no initial training, other than
18 sitting with experienced Contracts Advisers, as
19 far as I can recall, but there was -- as I said
20 before, there was training on an ongoing basis,
21 and I can recall a session of training where the
22 Contract Adviser were all taken away for a few
23 days to, you know, a hotel somewhere and trained
24 in various aspects of interviewing, for example,
25 and probably dealing with discrepancies and

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1 dealing with subpostmaster contracts in that
 2 way.
 3 **Q.** When you say interviewing in that context, is
 4 that interviewing for the purposes of
 5 determining whether a subpostmaster was
 6 responsible for misconduct or for determining
 7 whether to appoint a subpostmaster?
 8 **A.** The latter, appointment.
 9 **Q.** Was any training given in how to investigate
 10 whether or not a subpostmaster was responsible
 11 for misconduct?
 12 **A.** Misconduct?
 13 **Q.** Let me put it another way. One of the roles of
 14 a Contract Adviser, which we'll come to, is to
 15 determine whether or not a subpostmaster was in
 16 breach of contract; would you accept that?
 17 **A.** Yes.
 18 **Q.** Was there ever any training given to Contract
 19 Adviser on how to conduct an investigation into
 20 whether or not a subpostmaster was in breach of
 21 contract?
 22 **A.** I don't recall any specific training, no.
 23 **Q.** Let's look at the contractual position for
 24 losses. Please can we turn to your witness
 25 statement page 19, paragraph 66. Thank you.

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1 IMPACT Programme, and you refer to a document
 2 dated 14 November 2008.
 3 If we go over the page, please, you again
 4 talk about the settle centrally facility. But
 5 at 119, you say:
 6 "At the time, the contractual position in
 7 respect of losses was clear and the SPM was
 8 responsible for all kinds of losses whether
 9 caused by carelessness, negligence or error and
 10 losses of all kinds caused by assistants."
 11 That's not correct in 2008, is it?
 12 **A.** That was my understanding when I put the witness
 13 statement together. I stand to be corrected.
 14 **Q.** Was that -- well, actually, we'll come to that
 15 point now. Let's go back, please, to page 19,
 16 paragraph 66. Thank you. So, again, the clause
 17 is there in quotes. Can you explain what you
 18 understood that clause to mean?
 19 **A.** Yes. I see it as being fairly self-explanatory,
 20 in that the subpostmaster was indeed responsible
 21 for losses, as stated, caused by carelessness
 22 negligence or error and for all losses caused by
 23 the assistants, which, of course, means that
 24 there are -- or there could be losses in the sub
 25 office not caused by carelessness, negligence or

35

1 Here you open by saying you've been asked to
 2 confirm your understanding of the contractual
 3 position for losses, and you quote:
 4 "... 'the subpostmaster is responsible for
 5 all losses caused through his own carelessness,
 6 negligence or error and also for all losses
 7 caused by his assistants. Deficiencies due to
 8 such losses must be made good without delay'."
 9 The first part of that is taken from the
 10 subpostmaster's contract in force from 1994.
 11 **A.** Indeed, and that statement is common to
 12 a variety of contracts.
 13 **Q.** There was a different type of contract, I think,
 14 from 2011 onwards called the Network
 15 Transformation Contract; do you recall that?
 16 **A.** It'd be -- you had the main and local contracts,
 17 yes.
 18 **Q.** Precisely. Do you recall that that had
 19 a different position for dealing with losses for
 20 subpostmasters?
 21 **A.** No, I can't recall the difference.
 22 **Q.** Can we please just turn in your statement to
 23 page 32, paragraph 116. You are here -- this is
 24 just for context -- discussing the settling
 25 centrally function, which was brought in by the

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1 error, which would not be covered by this
 2 statement.
 3 **Q.** So if a loss was caused -- well, let's start.
 4 Firstly, there has to be an actual loss.
 5 **A.** Yes.
 6 **Q.** Secondly, if an assistant is responsible for
 7 that loss, the subpostmaster is liable for it?
 8 **A.** Yes.
 9 **Q.** But if the loss is the subpostmaster's, he or
 10 she is only responsible for it if it is caused
 11 by their own negligence, carelessness or error?
 12 **A.** That's what it says, yes.
 13 **Q.** So a loss caused by a computer error or
 14 a fictitious loss would not be the
 15 responsibility of the subpostmaster?
 16 **A.** Logic demands that that's the case. The most
 17 common cause of loss not caused by carelessness,
 18 negligence or error was a loss caused by
 19 a robbery or burglary, in which case the
 20 Security Operations Manual would be sort of the
 21 subsection of the contract which would come into
 22 play.
 23 **Q.** Let's look at some of the policies that derived
 24 from this. If we could turn up, please,
 25 POL00088904. You see the "Losses and Gains

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1 Policy Within the Post Office Counters Limited
2 Agency Network". At page 2 we can see it's
3 dated 20 November 1998, so pre-Horizon.

4 Please can we turn to page 4. This is the
5 introduction, which says that it's a policy
6 document that has been developed:

7 "... under the auspices of the Counters Risk
8 Management Committee, in order to provide clear
9 and consistent guidelines about financial losses
10 within the agency network."

11 If we can go slightly further down, please,
12 thank you. At the start of the paragraph at the
13 bottom, you see it says:

14 "The general principles addressed by this
15 paper are, of necessity, mandatory upon
16 Regions."

17 Do you recall being given this policy and
18 using it in the Audit Department?

19 A. Yes.

20 Q. So the aim of it was, as it says, to be
21 a reference guide for Post Office employees on
22 how to deal with losses or gains in accordance
23 with the contracts between the subpostmaster and
24 Post Office?

25 A. The contract was very clear. I think the policy

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1 Q. That's working to the benefit of the
2 subpostmaster when considering mitigation?

3 A. Yes, absolutely.

4 Q. Can we turn to section 3, please, at page 14.
5 This section deals with "Accounting Losses", and
6 it says:

7 "The subpostmaster is required to make good
8 all losses however they occur (Subpostmaster's
9 contract Section 12 paragraph 12)."

10 That's not what the contract says, is it?

11 A. No.

12 Q. Do you know why this policy, on the section for
13 accounting losses, contained this statement?

14 A. I didn't put the policy together but it does
15 refer to the section of the -- the relevant
16 section of the contract, which you've referred
17 to. Perhaps that's just an inaccurate shorthand
18 to say "make good all losses".

19 Q. Well, it's not shorthand, is it? It's
20 materially different?

21 A. It is materially different, yes.

22 Q. Would you accept that Auditors or anyone using
23 this document would be misled if they read this
24 paragraph?

25 A. If they read the first part of the paragraph

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1 was more to Do with the day-to-day deployment
2 where there may be occasions to deviate from the
3 contract, in cases of hardship, for example.

4 Q. Well, we see, it's the third paragraph down on
5 the page that's on the screen:

6 "From a purely contractual perspective
7 a subpostmaster or other agent is responsible
8 for all losses caused through his own
9 negligence, carelessness or error."

10 A. Yes.

11 Q. It goes on to say of the same with assistants.
12 So that's in accordance with the contract?

13 A. Absolutely right, yeah.

14 Q. This introductory section, is it fair to say
15 that an introduction to a policy document like
16 this, you may read it once but, when you're
17 going back to refer to it, you'll go to the more
18 substantive chapters later on?

19 A. That may be the case. The paragraph you're
20 referring to does go on to say that this stance
21 of the contractual position may be varied in
22 appropriate circumstances and --

23 Q. Yes, and, as you say, it there talks about if
24 there's financial hardship, et cetera.

25 A. Mm-hm.

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1 without the reference to the contract and
2 without referring to the contract, they could be
3 misled, yes.

4 Q. If we turn to page 33, please. So this is in
5 an annex which deals with the detailed processes
6 for how to handle cash account discrepancies.

7 If we could just go slightly further down,
8 please, thank you. It says:

9 "If the discrepancy is a shortage, the agent
10 should be advised to make the amount good. If
11 the shortage is the result of a known error, or
12 if making the amount good immediately would
13 inflict financial hardship, the agent may be
14 allowed to hold the amount in the unclaimed
15 payments section of the cash account for
16 a period of up to eight weeks."

17 Could you assist us, what does it mean when
18 it's referring to a "known error" there?

19 A. If the subpostmaster had recognised the fact
20 that an error had been made and was awaiting
21 an error notice -- in this case, a transaction
22 correction -- to rectify that error, that would
23 be a known error.

24 Q. So it was for the subpostmaster to say there's
25 a known error here and effectively persuade the

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1 Post Office that this would be corrected in due
 2 course with, at that time, an error notice?
 3 **A.** Yes.
 4 **Q.** That document can come down. Thank you.
 5 Does this policy or section 3 that we
 6 referred to reflect the thinking of Post Office
 7 Auditors and Contract Managers at the time that,
 8 if there was a loss, the subpostmaster had to
 9 make it good, unless they could establish
 10 a known error?
 11 **A.** Or unless there was financial hardship.
 12 **Q.** Leaving financial hardship to one side, if there
 13 was no financial hardship, was it on the
 14 postmaster to show that there was a known error?
 15 **A.** Yes.
 16 **Q.** Are you aware as to why there was no discussion
 17 in that policy of Post Office investigating the
 18 cause of the discrepancy itself?
 19 **A.** I'm sorry, I was drawing breath to add --
 20 I didn't wish to cross your speech then -- but
 21 the unclaimed payments table could be used for
 22 known errors or disputes, so there would be
 23 a degree of softening around that and,
 24 subsequently, in the Horizon days, then it would
 25 be like the settled centrally process, would be

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1 helpful to the Inquiry?
 2 **Q.** Yes, which question was that?
 3 **A.** The question was about the global user
 4 availability password for Auditors for the
 5 Horizon system, and I wasn't quick enough at the
 6 time but, on reflection, I just realised that if
 7 there was an unfortunate circumstance of the
 8 death of a subpostmaster, then the Auditors
 9 would be able to gain permission to use the
 10 system, in order to wrap up the accounts, do
 11 whatever was necessary.
 12 I don't know the protocols for that but it
 13 would certainly be something which wasn't dished
 14 out easily.
 15 **Q.** I see. So the capability was there to have
 16 these global user rights, as far as you are
 17 aware. The circumstance you refer to is the
 18 death of a subpostmaster but you can't assist us
 19 with the control mechanisms in place for how
 20 an Auditor would get access to those privileged
 21 access rights?
 22 **A.** That's quite right, sir, yes. I hope that's
 23 helpful.
 24 **Q.** Thank you, and repeating it to make sure I'd
 25 understood, thank you.

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1 the same, you know. You can settle centrally
 2 only if there's a known error or if there's a --
 3 you enter the dispute resolution process.
 4 **MR STEVENS:** That, sir, is probably a good time to
 5 pause and we'll come to the dispute resolution
 6 process after lunch.
 7 **THE WITNESS:** Thank you. I'll look forward to it.
 8 **SIR WYN WILLIAMS:** I was just unmuting myself.
 9 I agree, Mr Stevens. Thank you.
 10 **MR STEVENS:** Thank you, sir.
 11 **SIR WYN WILLIAMS:** 2.00?
 12 **MR STEVENS:** Yes, sir, thank you.
 13 (12.59 pm)
 14 (The Short Adjournment)
 15 (2.00 pm)
 16 **MR STEVENS:** Good afternoon, sir. Can you see and
 17 hear me?
 18 **SIR WYN WILLIAMS:** Yes, I can, thank you.
 19 **MR STEVENS:** Thank you, sir. I'll carry on.
 20 Mr Lusher, we were just discussing the local
 21 suspense account and you referred to dispute
 22 resolution. I want to turn there now ask.
 23 **A.** Mr Stevens, on reflection, I may be able to give
 24 a slightly better answer to one of the questions
 25 which you asked this morning. Would that be

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1 Local suspense account, then. If we could
 2 please bring up your witness statement, page 31,
 3 paragraph 111. Thank you. You start the
 4 paragraph by saying that you've been asked to
 5 explain what role the local suspense account
 6 played before its removal, and that was removal
 7 in the IMPACT Programme. You say:
 8 "The role of the local suspense account was
 9 to account for any unclaimed payments or
 10 receipts uncharged to the account. The suspense
 11 facility would also enable shortages or
 12 surpluses to be declared, but not made good or
 13 withdrawn. For example, if the balance of
 14 account showed a shortage, this could be entered
 15 as an unclaimed payment, which would have the
 16 same effect as adding it to the cash on hand,
 17 negating the shortage. With permission, the
 18 facility could be used legitimately to hold
 19 discrepancies for up to 8 weeks, usually whilst
 20 awaiting an error notice. The facility was
 21 replaced by the debt resolution process."
 22 Now, the debt resolution process, I think
 23 we'll come to it in a moment but just to be
 24 clear, are you talking about the process that
 25 existed when transaction corrections came in and

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1 there was the option to settle centrally?
 2 **A.** Paragraph 111 refers to the process before,
 3 before that --
 4 **Q.** Yes.
 5 **A.** -- and then -- unclaimed payments and uncharged
 6 receipts before and then the settle centrally
 7 process after.
 8 **Q.** After. So we're singing from the same hymn
 9 sheet there.
 10 **A.** Good.
 11 **Q.** You say, as I said, the facility could be used
 12 legitimately to hold discrepancies. Why did you
 13 use the word "legitimately" there?
 14 **A.** It wasn't uncommon to find the system used
 15 without the permission which was necessary.
 16 **Q.** In what circumstances would it be used without
 17 permission?
 18 **A.** We're talking before the IMPACT?
 19 **Q.** Yes, before IMPACT?
 20 **A.** So unclaimed payments, uncharged receipts
 21 weren't -- I don't know the extent to which they
 22 were monitored but the subpostmaster would have
 23 the ability to use those, whether he had
 24 permission or not, and so that was -- that would
 25 be one of the things that the Audit Team would

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1 **Q.** Again, this document would be used presumably by
 2 Contracts Advisers when considering how to deal
 3 with losses?
 4 **A.** Yes.
 5 **Q.** Paragraph 2 concerns the suspense account. It
 6 says:
 7 "Under circumstances where the exact cause
 8 of the loss is known and a compensating error is
 9 expected to be returned, losses may be held in
 10 the suspense account, with authority, providing
 11 that the agent has completed their own
 12 investigation and is able to show that an error
 13 notice is likely to be issued for that loss or
 14 an element of the loss (ie the agent must be
 15 able to detail a specific error that occurred
 16 for a specific client on a specific date and be
 17 able to provide documentary evidence eg from the
 18 Horizon transaction log)."
 19 So, in order for permission to be given
 20 under this policy, would you accept that the
 21 subpostmaster has to be able to prove, with
 22 a significant amount of precision, that there
 23 has been a known error in the account?
 24 **A.** Yes.
 25 **Q.** So earlier in your evidence, when you referred

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1 be looking out for, unauthorised use of, almost
 2 certainly, the unclaimed payments table, being
 3 shortages rather than surpluses in the uncharged
 4 receipts.
 5 **Q.** Let's come to the permission aspect and we'll
 6 turn to a document POL00088867. Thank you.
 7 At the top of this document, we see it's
 8 "Liability for Losses Policy", "Version Control"
 9 says "1.7 September 2003" but, if we look over
 10 the page, it appears that it was a later version
 11 "2.0 July 2004", so this would have been in
 12 place when you were Contract Adviser starting in
 13 2005.
 14 Could we turn to page 5, please. The first
 15 two sentences:
 16 "The subpostmaster's contract requires that
 17 losses are made good without delay. Immediate
 18 settlement is therefore the expected contractual
 19 norm."
 20 Do you accept that isn't strictly in
 21 accordance with what the contract says? The
 22 contract, as we covered this morning, it refers
 23 to the subpostmaster's carelessness, negligence
 24 or errors?
 25 **A.** Yes, I do accept that.

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1 to the suspense account being used for dispute
 2 resolution, it's not the case that the SPM could
 3 simply say, "Hang on a minute, I dispute these
 4 figures, I want to use the suspense account
 5 while this is being investigated"? In order to
 6 get permission to use it, the subpostmaster has
 7 to have had done a significant amount of
 8 investigative work already?
 9 **A.** There's a dichotomy there which I can't resolve.
 10 **Q.** Sorry, what is a dichotomy?
 11 **A.** The -- on the one hand, we're seeing here that
 12 the error must be specified and, on the other,
 13 I believe that the dispute resolution process
 14 allowed for an investigation. An investigation
 15 is not necessary if a loss can be proved.
 16 That's the dichotomy. Is that helpful, sir?
 17 **Q.** In terms of who would give the permission, that
 18 wouldn't be you, would it, to give permission to
 19 use the suspense account, as a Contract Adviser?
 20 **A.** No.
 21 **Q.** As we see in the next paragraph, it refers to
 22 the NBSC, and the last sentence in that again,
 23 it says:
 24 "If there is no clearly defined evidence of
 25 a known error (and, therefore, no error notice

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1 likely to be issued), authority will not be
 2 given."
 3 **A.** That's very clear, isn't it?
 4 **Q.** If we go just further down this page, it goes on
 5 to say:
 6 "To give authority to hold losses within the
 7 suspense account, even with evidence of the
 8 error, is against the principle of right first
 9 time. Granting authority to hold amounts in
 10 suspense should, therefore, always be considered
 11 to be the exception rather than the norm.
 12 Agents are expected to address the underlying
 13 cause of misbalancing and must expect that any
 14 subsequent errors of a similar nature will be
 15 referred to the retail line for corrective
 16 action."
 17 Does that fairly summarise how the suspense
 18 account was seen by the members of the Post
 19 Office -- or its use, I should say, the use of
 20 the suspense account?
 21 **A.** Yes, and clearly "right first time" refers to
 22 making no errors, that there should be no errors
 23 at all and, if there are subsequent errors, then
 24 a report for corrective action would be in line.
 25 **Q.** Please turn to page 8 of the same document.

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1 notice issued."
 2 The point that system faults are very rare
 3 and are normally identified after a full
 4 investigation -- or at least that they're very
 5 rare -- that's consistent with your evidence
 6 earlier that, as a Contract Adviser, you and
 7 others didn't think it was possible that
 8 discrepancies would be caused by Horizon; is
 9 that fair?
 10 **A.** Yes, that's correct.
 11 **Q.** Did you have any involvement at all in how
 12 Fujitsu -- sorry, I'll rephrase that.
 13 Were you aware of how Fujitsu, through the
 14 Helpdesk, investigated potential discrepancies
 15 in branch accounts?
 16 **A.** No, sir.
 17 **Q.** So if there was a bug, error or defect in the
 18 Horizon system, which wasn't a known error, not
 19 known to the NBSC, do you accept that the
 20 subpostmaster is effectively reliant on either
 21 the Horizon System Helpdesk or the NBSC
 22 identifying that error and they can't identify
 23 it themselves?
 24 **A.** Yes, that's what it says down here, yes.
 25 **Q.** If they can't identify it themselves, the

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1 Thank you. It refers to "Horizon Issues":
 2 "If an agent feels that an error has
 3 occurred via the Horizon system, it is essential
 4 that this be reported to the Horizon System
 5 Helpdesk."
 6 Pausing there, that's the Helpdesk that was
 7 run by Fujitsu at the time; do you agree?
 8 **A.** I don't know.
 9 **Q.** "The HSH will only consider the incident for
 10 further investigation if the branch has evidence
 11 of a system fault. If no evidence is available,
 12 the case will not be investigated and the agent
 13 will be held responsible for making good the
 14 loss.
 15 "System faults are very rare and are
 16 normally identified after a full investigation
 17 has been undertaken. All known system errors
 18 are managed through Network Support Problem
 19 Management. Access to Problem Management is via
 20 the NBSC. If the agent feels that the issue is
 21 not being resolved, they should flag the issue
 22 up with NBSC. If a known system error has
 23 caused a shortage, the agent should be given
 24 authority to hold the loss in suspense until the
 25 system error has been reconciled and an error

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1 subpostmaster can't prove that there's a known
 2 error or an error and has to make good the loss
 3 themselves?
 4 **A.** That's correct too. I wasn't very involved in
 5 this process but I'm just drawing the logic from
 6 what you've read out there in section 6.
 7 **Q.** You weren't involved in the process but, at the
 8 time, did you consider that situation to be
 9 fair?
 10 **A.** My involvement was to report any issues with the
 11 Horizon system. We looked at the case of
 12 Rivenhall, where that's what -- exactly what
 13 I did, to report the problem there to Andy Winn
 14 and Andy, in NBSC, would have had access to the
 15 Horizon System Helpdesk, and so on, to report
 16 onwards.
 17 So my involvement was very limited. As to
 18 whether I think the system was fair, um ...
 19 harsh but, in the light of information received
 20 subsequently, like in the last few years, as
 21 a result of the Inquiry, clearly it's not as
 22 fair as I thought it was at the time.
 23 **Q.** So we've discussed the Helpdesk and how, in some
 24 ways, if you're relying on the Helpdesk to find
 25 an error, or the subpostmaster is as well,

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1 that's one element. You've also referred to
2 Andrew Winn, Mr Winn. In your statement --
3 sorry, that document can come down now, thank
4 you.

5 In your statement, at paragraph 21, which is
6 at page 7, you say:

7 "When there were unexplained accounting
8 shortages, team members would often liaise with
9 the Accounting Department at Chesterfield, or
10 other departments to establish whether error
11 notices were due to be issued. The system of
12 rectifying errors could be slow and several
13 weeks may elapse before a discrepancy could be
14 corrected in the account. On occasions when
15 there were a number of errors in the system, it
16 became complex and sometimes almost impossible
17 to pinpoint the cause of a discrepancy."

18 Was it of concern to you that the Post
19 Office back office staff would sometimes
20 struggle to pinpoint the cause of a discrepancy
21 and yet the Post Office expected subpostmasters
22 to identify and evidence the calls themselves.

23 **A.** I don't think the Post Office staff had
24 difficulty in identifying individual errors.
25 The difficulty which I referred to here is when

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1 discrepancies in difficult cases were fully
2 investigated?

3 **A.** I saw him as the expert.

4 **Q.** Sorry?

5 **A.** As the expert.

6 **Q.** The expert.

7 Did you hear the evidence of Andy Winn to
8 this Inquiry on 3 March?

9 **A.** No.

10 **Q.** When it came to discussing his time in the P&BA,
11 where he looked at these accounting problems in
12 branches, he agreed that his level of
13 understanding of the role was basic and
14 equivalent to an occasional end user. That's,
15 for the record, transcript page 26, line 8. He
16 further accepted that his role required a much
17 more detailed understanding of Horizon than he
18 had and his evidence was that he found
19 technology quite difficult even now.

20 You've referred to him as an "expert". Did
21 you understand him to have more than a basic
22 grasp of Horizon?

23 **A.** Yes, sir, I did.

24 **Q.** Did you continue to think that when you made
25 your witness statement?

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1 there are number of errors in a sub office
2 account, it becomes -- it can become quite
3 a complex matter to unravel the situation. It
4 may take time to do that.

5 **Q.** We then come to the involvement of Mr Winn, as
6 you say, in paragraph 22:

7 "Either the Audit or the Contract Team could
8 refer disputed errors to the Accounting Team
9 based in Chesterfield who had access to the
10 Horizon system and were very helpful in
11 resolving errors and latterly had a champion for
12 difficult cases -- Andy Winn."

13 **A.** Mm.

14 **Q.** When you say Andy Winn was a "champion", what do
15 you mean by "champion"?

16 **A.** If there was a difficult accounting matter to be
17 dealt with, Andy Winn was the expert and had
18 access to all the systems available to resolve
19 any enquiries.

20 **Q.** So if there was an unexplained discrepancy and
21 a subpostmaster was suggesting that it was
22 related to Horizon or caused by Horizon, would
23 Andy Winn be the go-to man?

24 **A.** Yes.

25 **Q.** Did you see him as a safeguard to ensure that

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1 **A.** Yes.

2 **Q.** What was the basis of that belief, that Mr Winn
3 was a champion for difficult cases?

4 **A.** I don't know. I don't wish to guess, sir, but
5 I think he was put forward at least as the
6 contact within P&BA to deal with these matters.

7 **Q.** Now, with hindsight, having heard what Mr Winn
8 said about his own experience, as I say, it was
9 described as basic and equivalent to
10 an occasional end user, do you have concerns or
11 do you see there being a problem with the way in
12 which Mr Winn was used by Contract Adviser to
13 deal with discrepancies -- unexplained
14 discrepancies, I should say?

15 **A.** The fault may be entirely mine but I am somewhat
16 shocked to find that Andy Winn didn't have the
17 expertise that I considered he had, and I don't
18 know how other Contract Adviser regarded Andy,
19 but it is a matter of concern to me now.

20 **Q.** Why is it a matter of concern to you?

21 **A.** Because I relied on his responses and the
22 information he provided. I, myself, am not
23 an expert in the Horizon system, I can find my
24 way around accounts quite well but the system
25 itself is not an area where I have expertise

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1 and, therefore, I relied somewhat on Mr Winn to
 2 provide that gap in my own expertise.
 3 **Q.** So when we looked at the Rivenhall branch
 4 earlier and I asked about remote access, and you
 5 referred to Mr Winn and you didn't pursue it
 6 further because of the information you were
 7 given, if, at that stage, you were aware of what
 8 Mr Winn now says of his level of expertise,
 9 would you have done anything differently?
 10 **A.** Possibly.
 11 **Q.** What do you think you would have done
 12 differently?
 13 **A.** I would have looked for somebody who had
 14 expertise in the system to give a definitive
 15 answer. I thought that person was Mr Winn.
 16 **Q.** Were you aware of anybody else at Post Office
 17 who may have had such expertise?
 18 **A.** I would have hoped and expected that the gateway
 19 to that person would have been Mr Winn himself,
 20 had he not got the expertise personally, yeah.
 21 **Q.** Thank you. We then come to the IMPACT Programme
 22 and this is where we deal with the introduction
 23 of transaction corrections. The Inquiry has
 24 heard a significant amount of evidence on how
 25 that policy was developed and the settle

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1 corrections under that amount.
 2 **Q.** Can I turn to page 33 of your witness statement,
 3 paragraph 118, just one further point on this
 4 topic.

We were here, right in the morning, to look
 at paragraph 119 but it's 118 now that I want to
 look at. It says:

"There was not anything to distinguish
 a disputed debt from an undisputed debt and
 I cannot see that the policy or the contract
 made any distinction."

I understand you there to be referring to
 when a subpostmaster sought to dispute
 a discrepancy or a transaction correction and
 they settled centrally. The process is or was
 said to be that the enforcement procedures for
 recovering that debt would be paused, while the
 debt was resolved.

19 **A.** If the dispute process was invoked, yes.
 20 **Q.** In that context, could you please explain what
 21 you mean at paragraph 118, that there was
 22 nothing to distinguish a disputed debt from
 23 an undisputed debt?
 24 **A.** Can I just read the one or two points
 25 beforehand --

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1 centrally for amounts over £150.

2 As I understand it, you were not involved in
 3 how that policy was devised?

4 **A.** Not as far as I can recall, no.

5 **Q.** I'm not going to cover with you the settle
 6 centrally issue which has been dealt with by
 7 other witnesses. What I do want to ask is about
 8 transaction corrections for under £150. So if
 9 there was a transaction correction for less than
 10 £150, the subpostmaster would simply have to
 11 accept it and they didn't have the option of
 12 settling centrally?

13 **A.** Yes, I believe that's the case.

14 **Q.** So a person could receive several of these
 15 throughout a year, which, even though under
 16 £150, could develop into quite a substantial sum
 17 of money?

18 **A.** I believe that's the case, yes.

19 **Q.** What was the procedure for dispute resolution
 20 for those amounts?

21 **A.** I'm not aware of a dispute resolution process.
 22 The subpostmaster would always have the
 23 Helpdesk, NBSC could make enquiries but I don't
 24 believe, as far as I'm aware, there was a formal
 25 process for errors under £150 or transaction

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1 **Q.** Yes, of course.

2 **A.** -- to understand the context of this?

3 **Q.** Of course. I think it would help to start
 4 probably at the bottom of the page before --
 5 there, I think from there. Do just say when
 6 you're ready to read on?

7 **A.** Thank you very much. Can I enquire of the
 8 question which was put to me to answer the point
 9 118?

10 **Q.** Sorry, I misheard you?

11 **A.** I was responding to a question to give the
 12 answer at 118 and I'm not sure what that
 13 question was.

14 **Q.** Oh, I'm sorry. If we bring 118 back.
 15 Apologies, I misheard. Could you please explain
 16 what you mean here when you say there was not
 17 anything to distinguish a disputed debt from
 18 an undisputed debt?

19 **A.** I'm struggling to recognise the situation that
 20 I had in mind when I wrote that but, in terms of
 21 a settled centrally debt, then it could only --
 22 it was a figure. What it referred to, whether
 23 it was disputed or undisputed, there was nothing
 24 to distinguish between the two.

25 **Q.** That document can come down. Thank you. Was

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1 there a risk of Post Office seeking to enforce
 2 debt that was disputed, if there was no
 3 distinction?
 4 **A.** Under £150 definitely, and there would be
 5 enquiries ongoing to establish the reason for
 6 it, a debt in -- before enforcement.
 7 **Q.** During your time as a Contract Adviser, were you
 8 aware of any subpostmaster complaints about the
 9 transaction correction process?
 10 **A.** I can't recall any.
 11 **Q.** Were you aware of the nature or volume of
 12 transaction corrections?
 13 **A.** Some awareness, yes.
 14 **Q.** What was that awareness?
 15 **A.** The transaction correction rates for some
 16 products was higher than others. The lottery,
 17 for example, attracted a lot of transaction
 18 corrections.
 19 **Q.** Were you ever concerned by the numbers?
 20 **A.** In certain branches, it was certainly a matter
 21 of concern.
 22 **Q.** When you say in some branches, do you mean
 23 concern for the way that branch was running,
 24 rather than general concern across the Network
 25 as to how many transaction corrections were

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1 investigations proceeded.
 2 **Q.** What effect did it have on a subpostmaster's
 3 access to premises, documents or data.
 4 **A.** The subpostmaster didn't have access to premises
 5 or data.
 6 **Q.** So the effect was significant?
 7 **A.** Yes.
 8 **Q.** We don't need to turn it up but at paragraph 145
 9 of your statement you say that there was no
 10 right to appeal against a decision to suspend?
 11 **A.** That's correct.
 12 **Q.** So would you accept that the decision on whether
 13 or not to suspend a subpostmaster ought to have
 14 been taken carefully and in accordance with the
 15 contract?
 16 **A.** Yes.
 17 **Q.** I want to first look at who made the decision.
 18 Again, we don't need to turn it up but, at
 19 paragraph 135 of your statement, you say that:
 20 "For a long time, the Contract Adviser would
 21 consult with a senior manager before any
 22 decision was made [as to suspension]. As
 23 awareness of Horizon difficulties increased, any
 24 such decision was taken at senior manager
 25 level."

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1 being generated?
 2 **A.** Yes, that's what I meant initially but there was
 3 concern in the Network about the number of
 4 transaction corrections concerned with lottery,
 5 probably the reason I remembered that one
 6 specifically. The accounting process was
 7 slightly more complex for lottery transactions.
 8 **Q.** Was there any concern or discussion, that you're
 9 aware of, that the volume of transaction
 10 corrections was caused by the Horizon IT System?
 11 **A.** No.
 12 **Q.** I want to move on to look at suspension and
 13 where I say suspension it's often referred to as
 14 precautionary suspension of a subpostmaster.
 15 Can you explain what the effect of a suspension
 16 on a subpostmaster was?
 17 **A.** Yes, when there was a suspension, then the trade
 18 at the branch would stop, as would the
 19 remuneration to the subpostmaster and, normally,
 20 there would be a search for a temporary
 21 subpostmaster to take over. If that was
 22 possible, then it could be affect very quickly
 23 so the customer base wouldn't be affected. But
 24 sometimes it did result in the closure of
 25 a branch for a period of time while

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1 Let's start with awareness of Horizon
 2 difficulties increased. Firstly, when did that
 3 occur?
 4 **A.** I don't know the date, sir, but I've referred to
 5 a continuum earlier in the day, I believe, when
 6 initially we came across the odd one or two
 7 cases and it became public knowledge then as the
 8 Inquiry started. And, somewhere along that
 9 line, there was a stage where the Contract
 10 Adviser were less involved and senior managers
 11 took control of the whole decision-making
 12 process in regard of suspension and termination
 13 of contracts.
 14 **Q.** Let's look at a document which may assist. It's
 15 POL00084002. This sets out for Auditors the
 16 contact points for branch suspensions. We see
 17 in the first paragraph it's 25 September 2006.
 18 If we can go down, please.
 19 So we see in the first column we have people
 20 identified and their contacts in the next
 21 columns, and you're identified as first contact
 22 for Steve Gibbs and then as a "Buddy Contract
 23 Adviser" for Peter Pycock. So, at this point,
 24 would the decision here, be it that that's the
 25 contact point as the Contract Adviser, so in

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1 2006 is the decision with the Contract Adviser
 2 with consultation of Senior Managers, rather
 3 than it being the Senior Manager's decision?
 4 **A.** I believe that was the case, sir, yes.
 5 **Q.** Then there's a continuum, you refer to. Can you
 6 recall a specific point -- for example in 2009
 7 there was a *Computer Weekly* article. Did you
 8 read that at the time, which --
 9 **A.** Not aware of that, sir.
 10 **Q.** Can you help us place when you think that
 11 Horizon difficulties increased such that senior
 12 managers were involved in making the decision
 13 rather than yourself?
 14 **A.** I can share a little confusion, rather than help
 15 you, but it may help if I do that, in that on
 16 occasions when my line manager, in the period of
 17 interest, was Lin Norbury, on occasions when she
 18 was on leave, I would stand in for her and deal
 19 with enquiries from Contracts Advisers
 20 concerning suspensions. I remember being
 21 surprised when a particular Contract Adviser
 22 phoned in to question her or to bounce the ideas
 23 around about a suspension and asked for the
 24 opinion of that Contract Adviser and the
 25 response was "Well, that's the decision at your

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1 effectively --
 2 **A.** Yes.
 3 **Q.** What did you think of that decision? Did you
 4 think that you or Contract Managers were not
 5 capable of making a decision on suspension?
 6 **A.** Yes, there was an element of that, especially
 7 Contracts Advisers, some of whom had been in
 8 post for some considerable time and seemed
 9 a little bit undermined. But, at the same time,
 10 it is what the business decided, so the
 11 decisions went to higher grade.
 12 **Q.** When was the decision to suspend usually taken?
 13 **A.** Normally it would be taken following an audit or
 14 during the process of an audit.
 15 **Q.** On the same day?
 16 **A.** Yes.
 17 **Q.** We don't need to turn it up but in paragraph 138
 18 of page 39 of your statement, you say you don't
 19 believe there was any process for the
 20 subpostmaster to make representations about the
 21 decision but it would often be the case that the
 22 Contract Adviser would speak to the
 23 subpostmaster at the time of the audit.
 24 Is that based on your practice or --
 25 **A.** Yes.

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1 grade, not at my grade". So it was quite clear
 2 that that Contract Adviser considered that the
 3 decision was at senior manager level.
 4 **Q.** So when do you think that conversation would
 5 have happened? Was that in 2006 or later in
 6 the --
 7 **A.** Later. 2008/9, something of that order. But
 8 I was surprised by that. So it was clear that
 9 there was some confusion.
 10 **Q.** Why do you link a shift to Senior Management
 11 making this decision to awareness of Horizon
 12 difficulties?
 13 **A.** It was at a time when there was a reduction in
 14 the number of criminal prosecutions and the
 15 business, in areas above my pay grade, were
 16 concerned about the Horizon situation and,
 17 therefore, decided to, you know, narrow the
 18 field of decision making in any matters relating
 19 to Horizon.
 20 **Q.** So do you think that would have been around the
 21 time of the Second Sight investigation, 2012
 22 through to 2015, that period?
 23 **A.** Yeah, could well be, yeah.
 24 **Q.** Just to confirm I heard correctly, that was
 25 a decision from senior management to

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1 **Q.** -- are you aware that -- sorry, was that
 2 a "yes"?
 3 **A.** Yes, that is what I would do, yes. I would
 4 always try to speak to the subpostmaster to
 5 establish the situation.
 6 **Q.** Was there variance in that practice with other
 7 Contracts Advisers?
 8 **A.** Well, there may have been, I can't speak for
 9 them all but it would seem sensible procedure to
 10 me.
 11 **Q.** At page 8 of your witness statement,
 12 paragraphs 24 and 25, or paragraph 25 in
 13 particular, you say towards the end:
 14 "Suspension wasn't an exercise in assigning
 15 blame, it was done simply to control risk and
 16 gather information until such time as the issues
 17 could be explained and rectified."
 18 What do you mean by suspension wasn't
 19 an exercise in assigning blame?
 20 **A.** Perhaps we should regard suspension as
 21 a stopping the risk to funds. It wasn't unknown
 22 for a suspension to last for a very short period
 23 of time. Investigations could be made and, you
 24 know, within a day or two the contract could be
 25 reinstated. And so the suspension itself was,

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1 as you referred to earlier, a precautionary
2 suspension, pending investigation.
3 **Q.** When you say that it's to reduce risk, is that,
4 what, a risk of a subpostmaster absconding with
5 more money?

6 **A.** Yes.

7 **Q.** Are there any other risks?

8 **A.** Yes. We referred colloquially to office
9 accounts sometimes being in a muddle and
10 sometimes as a result of a fiddle. In other
11 words, an office account can quickly get into
12 a situation where nobody is quite sure
13 whether -- you know, whether further errors are
14 coming or whatever and they needed a little bit
15 of time, a breathing space, to resolve the error
16 notice coming through and it may be that what
17 appeared to be a significant audit shortage
18 could disappear because errors had been
19 identified, and so that was the -- one purpose
20 of a precautionary suspension.

21 And if things did resolve themselves, so
22 that there was no discrepancy left, then
23 a decision would be made on whether the
24 subpostmaster was sufficiently competent to
25 continue in office or whether the risk to funds

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1 **A.** The risk is that there may be errors in the
2 system which are not apparent at the time of the
3 audit.

4 **Q.** Can we look at the contract, please, the
5 relevant contract. It's POL00082751, page 90,
6 please. This is, I should say, the
7 Subpostmasters Contract, as you'll see from the
8 screen.

9 **A.** Thank you.

10 **Q.** Thank you. If we could go to the bottom of the
11 page, please. It says that:

12 "A subpostmaster may be suspended from
13 office at any time if that course is considered
14 desirable in the interest of Post Office
15 Counters Limited in consequence of his: (a)
16 being arrested, (b) having civil or criminal
17 proceedings brought or made against him, (c)
18 where irregularities or misconduct at the
19 office(s) where he holds appointment(s) have
20 been established to the satisfaction of Post
21 Office Limited, or are admitted, or are
22 suspected and are being investigated."

23 So, as we see here, it says,
24 "A subpostmaster may be suspended". So do you
25 accept that the clause said that the Post Office

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1 would be too great or whether this was, perhaps
2 with a new subpostmaster, a case where
3 additional training and support would resolve
4 the situation.

5 **Q.** So the question I asked was about risk, and one
6 of them was about absconding with money the
7 other you refer to the accounts themselves,
8 and --

9 **A.** Yeah, one was about a fiddle, as I referred to.

10 **Q.** A fiddle, yes.

11 **A.** Which, obviously, I mean the various activity
12 within the accounts, perhaps, theft or whatever.
13 On the other was the muddle, which is where
14 investigations -- you know, that's a risk,
15 a muddle is still a risk because there may be
16 a loss of control of the accounts and displaying
17 incompetence of the subpostmaster.

18 **Q.** But at the time of the suspension, the audit has
19 been carried out so there's an independent
20 record of what's in the Post Office and the data
21 is, for all your concern, is on Horizon. So
22 what is the additional risk that you're trying
23 to identify that requires the suspension of
24 a subpostmaster in relation to a fiddle or
25 muddle of the accounts?

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1 had an option to suspend, if suspension was
2 considered desirable for one of the reasons
3 stated?

4 **A.** Yes.

5 **Q.** It didn't have to do so?

6 **A.** I accept that, yes.

7 **Q.** So this clause envisages that, where there is
8 a discrepancy, for example, raised, someone at
9 Post Office will consider all the facts and
10 consider whether it is desirable to suspend the
11 subpostmaster?

12 **A.** Yes.

13 **Q.** That person should consider all the relevant
14 factors and dismiss or not consider any
15 irrelevant ones?

16 **A.** Logic would dictate so, yes.

17 **Q.** They should make that decision in good faith?

18 **A.** Yes.

19 **Q.** In this case, the Post Office entrusted that
20 decision -- well, it's unclear -- either to
21 Contract Managers or at some point a mixture of
22 Contract Managers and senior management?

23 **A.** Yes, that's right.

24 **Q.** Please can we bring up POL00089004. Thank you.
25 It's not necessarily easy to tell from this but

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1 it's understood that this is a pocket-sized
 2 booklet. You're nodding; do you recall being
 3 given this?
 4 **A.** Yes.
 5 **Q.** At page 2, it's titled "Managing Agents
 6 Contracts, Guidelines for the Line Manager".
 7 Line Manager, we've been using the term
 8 "Contract Adviser", would this be used by
 9 Contract Advisers?
 10 **A.** The booklet was designed for Contract Managers
 11 or Contract Advisers or whatever they were
 12 called at the time, yes.
 13 **Q.** It's design is to be a reference book for
 14 Contract Advisers to use in how to apply Post
 15 Office policy?
 16 **A.** Yes.
 17 **Q.** Did you use it?
 18 **A.** Yes, it was available to me, yes.
 19 **Q.** It was available to you but would you use it as
 20 a reference guide?
 21 **A.** Yes, I would.
 22 **Q.** Can we turn to page 67, please, towards the
 23 bottom of the page. This a section on
 24 "Precautionary Suspension", and it says that:
 25 "This course of action is considered

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1 were concerns -- please, can we go to page 68?
 2 Would that be possible, please?
 3 **Q.** Sorry, yes, of course. If we could go to the
 4 next page, please.
 5 **A.** Yeah, where there are -- suspecting dishonesty.
 6 But I would give suspension consideration,
 7 rather than saying "Yes, we will suspend".
 8 **Q.** What would you take into account, then? If
 9 you're making this decision, what would you take
 10 into account?
 11 **A.** The experience of the subpostmaster, the size of
 12 the discrepancy, any admissions. Those are
 13 examples that spring to my mind now.
 14 **Q.** Would you ever consider if there was evidence of
 15 actual theft or just if it was a discrepancy
 16 enough?
 17 **A.** A sizeable -- evidence of theft can only be
 18 an admission, I think. I'm not sure what other
 19 evidence of theft could be provided.
 20 **Q.** We'll come to that when we look at
 21 investigations in a bit more detail, what
 22 evidence there could be. Let's have a look at
 23 another document. It's POL00086116, please.
 24 Now, in your witness statement, you describe
 25 this as an *aide memoire*. Do you recall when

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1 appropriate in the interests of Post Office
 2 Network when:
 3 "(a) The subpostmaster is arrested.
 4 "(b) The subpostmaster has civil or criminal
 5 proceedings brought against them.
 6 "(c) There are irregularities or misconduct
 7 at the post office or where grounds exist to
 8 suspect dishonesty."
 9 There are two additional points there we
 10 don't need to go into. If we can just go back
 11 up to have the original part of the text on the
 12 screen, please. This is different from the
 13 contract, isn't it, because it's saying that
 14 suspension is appropriate when one of these
 15 factors is set out, not that it may be
 16 appropriate if considered desirable?
 17 **A.** If you -- you've displayed the two different
 18 wordings there, yes.
 19 **Q.** So did Contracts Advisers see suspension as
 20 always appropriate when one of these conditions
 21 was met?
 22 **A.** I would have given them a suspension
 23 consideration when -- and, obviously, if
 24 a subpostmaster had been arrested then, yes,
 25 a suspension would be necessary but, if there

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1 this document was made or when you started using
 2 it?
 3 **A.** No, I'm afraid I don't recall when the thing was
 4 made but it was a useful document.
 5 **Q.** If you can't remember when it was made or was
 6 a useful document, assume it was -- let's just
 7 take a hypothetical date and it was made in
 8 2008. If it was made in 2008, would it
 9 effectively set out what you would have done as
 10 a Contract Adviser before that date? So it
 11 wasn't setting new practice, it was just setting
 12 down --
 13 **A.** No, not setting new practice. This was to bring
 14 together the wisdom of the time, and the
 15 information in the contract and other guidance
 16 given.
 17 **Q.** So when you say drew together the wisdom, this
 18 was effectively the thinking of senior
 19 management and Contracts Advisers?
 20 **A.** Yes.
 21 **Q.** If we could go down, please, towards the bottom,
 22 under the bold text, it says:
 23 "If in any doubt, make decision to suspend
 24 and carry out further investigations."
 25 So presumably you adopted that approach as

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1 a Contract Adviser?

2 **A.** Yes, as I referred to earlier, reinstatement of

3 the contract could be swift if investigations

4 proved fruitful.

5 **Q.** Yes, but during that time, when this decision to

6 suspend is made, the subpostmaster is without

7 remuneration -- yes --

8 **A.** Yes, yes.

9 **Q.** -- and locked out of the premises?

10 **A.** Yes, yes, yes.

11 **Q.** So is another way of saying this that a Contract

12 Adviser should suspend a subpostmaster unless

13 they are sure that the subpostmaster did no

14 wrong or that suspension was desirable?

15 **A.** That would logically follow.

16 **Q.** Why was the burden of proof put on the

17 subpostmaster like that?

18 **A.** The issue would only arise when a significant --

19 normally when a significant audit shortage had

20 been identified, so that, at that stage -- and

21 surely it would be fair for the subpostmaster to

22 provide some kind of explanation.

23 **Q.** Well, earlier we referred to the fact that, if

24 a discrepancy had been caused by a bug, error or

25 defect in the Horizon IT System, the

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1 unexplained discrepancies for which I just have

2 no explanation, I think it's the Horizon IT

3 System"?

4 **A.** Yes, if there's no explanation and there's

5 a shortage in the account, then suspension,

6 I think, would be appropriate to enable

7 investigation to take place.

8 **Q.** So in those circumstances, just spend, okay.

9 We've then got (2) if there's a discrepancy

10 identified, and we're back to this figure of

11 £1,000 "a guiding figure for suspension is where

12 a discrepancy is in excess of £1,000". Again,

13 why was that seen to be a significant figure for

14 suspensions?

15 **A.** I think I said before that I'm not sure why the

16 figure of £1,000 was arrived at but a smaller

17 figure would -- you know, we need to recognise

18 that a suspension was an expensive process, as

19 well as causing great difficulty to the

20 subpostmaster. So for smaller sums, then

21 probably not appropriate.

22 **Q.** Well, when you compare a company the size of the

23 Post Office and what effect a £1,000 discrepancy

24 would have on it, compared to the effect of

25 a subpostmaster and effectively no remuneration,

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1 subpostmaster wouldn't be able to show that?

2 **A.** Yes, I agree with that.

3 **Q.** The contract said that the subpostmaster was

4 only responsible for losses caused by

5 carelessness?

6 **A.** I agree with that too, sir.

7 **Q.** So, again, why did the fact that a discrepancy

8 may have been over a certain amount mean that

9 the subpostmaster bore the burden of proof in

10 persuading a contractor beyond doubt that they

11 hadn't done anything wrong?

12 **A.** Hadn't done anything wrong? I mean, it's

13 carelessness, negligence or error. The

14 suspension just allowed time for that

15 investigation to take place.

16 **Q.** If you could go up, please, to look at some of

17 these factors. The first refers to where

18 there's been an admission or suspected misuse of

19 funds or admission of inflation of cash or

20 stock; if misuse is admitted the amount is

21 irrelevant.

22 As a Contract Adviser, would you take into

23 account an explanation from the subpostmaster,

24 for example if they said, "Well, I've inflated

25 the cash or stock because I've got these

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1 do you think that £1,000 was too low, rather

2 than too high?

3 **A.** Certainly on the low side. But that's the

4 figure that was produced for us and that's the

5 figure we worked to.

6 **Q.** Why was the size of branch relevant?

7 **A.** Some of the branches of the Post Offices were

8 major high street stores with very high level of

9 turnover, and so on, and some of them were very,

10 very tiny sub offices in the countryside,

11 possibly only open for a few hours a week. So

12 that would certainly be taken into account.

13 **Q.** But in which way? So, if it was a smaller sub

14 post office, would that be more or less likely

15 to result in a suspension?

16 **A.** All the factors have to be taken into account,

17 not just the size of the branch.

18 **Q.** Well, is it the fact that the size of the branch

19 was taken into account for the Post Office

20 considering its own turnover, in the sense of

21 a bigger branch being suspended would result in

22 Post Office's turnover --

23 **A.** Yes, that would certainly be a consideration.

24 There would be more inconvenience to the public

25 and, as you say, less turnover for the Post

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1 Office than a larger branch. So one would want
2 to avoid termination of a large branch if
3 possible.

4 **Q.** So a smaller branch would be more likely to be
5 suspended on these guidelines?

6 **A.** Yes.

7 **Q.** What was the relevance of settling the debts
8 centrally, both the proportion and frequency?

9 **A.** I referred to a model before and, if
10 a subpostmaster was incompetent, then it could
11 result in frequent debt being settled centrally
12 and frequent transaction corrections, as stated
13 here. So it would be an indication that
14 something was not quite right with the
15 accounting at the branch.

16 **Q.** The final one, the subpostmaster's ability or
17 willingness to make good the loss. Well,
18 firstly, why was the subpostmaster's ability to
19 make good the loss relevant to whether or not
20 they would be suspended?

21 **A.** Well, again, if there was a question of
22 incompetence, then the debt could increase over
23 a period of time and a suspension would prevent
24 that increase in debt.

25 **Q.** The willingness, would someone who was more

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1 **A.** If that information was available, that's
2 certainly something that would be taken into
3 account, yes.

4 **Q.** So why isn't it written in this list?

5 **A.** I can't answer that.

6 **Q.** Number 3 concerns absentee subpostmasters, which
7 we don't need to consider. Then we've got 4:

8 "Gain opinion from auditor."

9 Could you just flesh that out for us?

10 **A.** Yes.

11 **Q.** What would be being sought?

12 **A.** In principle the Auditor was there to provide
13 the numbers and purely the facts. But they were
14 at the office and they may have gained an
15 impression that the subpostmaster was, for
16 example, trying to cover something up or being
17 difficult in one way or another. So the Auditor
18 may think "Oh, there's something really wrong
19 here", or they may equally find that the
20 subpostmaster was floundering in a muddle and
21 indicate that way.

22 And that would just be a bit of helpful
23 information in decision making.

24 **Q.** Finally:

25 "Consider potential future risk to Post

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1 willing to make good the loss be less likely to
2 be suspended?

3 **A.** Yes.

4 **Q.** So does that mean someone who was disputing the
5 loss be more likely to be suspended?

6 **A.** Yes.

7 **Q.** There's no reference here to whether or not
8 there was evidence of the subpostmaster calling
9 the NBSC or the Fujitsu Helpdesk. Was that ever
10 considered by Contracts Advisers?

11 **A.** Just the frequency of calls to the NBSC for
12 help, do you mean?

13 **Q.** Well, if they were calling for help with Horizon
14 saying, "I've made regular -- each week I'm
15 getting problems and I'm calling the Helpdesk
16 and I'm not getting any assistance", would that
17 be taken into account?

18 **A.** Yes, I recall information being available which
19 indicated the number of calls to the Helpdesk.
20 I think that information was generally used for
21 risk analysis to decide for which branches to
22 audit, one of the elements there.

23 **Q.** So that's used for audit but, when you're
24 considering whether or not to suspend someone,
25 would you --

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1 Office Limited funds if the subpostmaster is
2 left in post."

3 What sort of points would you be considering
4 there, as distinct from what's gone before?

5 **A.** I think it refers to the level of competence of
6 the subpostmaster. So if the subpostmaster is
7 incompetent, then Post Office funds would be at
8 risk if allowed -- if the office was allowed to
9 continue.

10 **Q.** Did you ever consider alternatives to
11 suspension, such as more frequent visits or
12 advice and input from the --

13 **A.** Oh, yes.

14 **Q.** -- Network Support Agents?

15 **A.** Yes, definitely, and, even after suspension,
16 then reinstatement would, you know, often then
17 require additional training, additional support
18 of one way or another.

19 **Q.** Can you ever recall a time when you didn't
20 suspend a subpostmaster and, instead, put in
21 place an alternative in place of suspension?

22 **A.** I can't recall a specific occasion, sir.

23 **Q.** Can you recall an occasion when you were faced
24 with a subpostmaster who had a discrepancy in
25 excess of £1,000 and you decided not to suspend

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1 them?

2 **A.** Well, again, I can't remember a specific case
3 but we are dealing with more than 10 years ago.

4 **MR STEVENS:** Thank you.

5 Sir, that's probably a good time to take the
6 afternoon break as I'll be going on to another
7 topic.

8 **SIR WYN WILLIAMS:** Again, I was struggling to unmute
9 myself but I agree.

10 **MR STEVENS:** Thank you, sir, would 3.20 work?

11 **SIR WYN WILLIAMS:** Yes. Sure.

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

13 (3.04 pm)

14 (A short break)

15 (3.20 pm)

16 **MR STEVENS:** Good afternoon, sir, can you see and
17 hear me?

18 **SIR WYN WILLIAMS:** Yes, I can, thank you.

19 **MR STEVENS:** Thank you.

20 Mr Lusher, I'm now going to go on to discuss
21 termination. We discussed the effect of
22 suspensions before the break. The effect of
23 termination is obvious. It brings, well, the
24 post office element of the subpostmaster's
25 business to an end. So, again, presumably you

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1 suspension and termination, was the main
2 investigative work done by you or someone in the
3 Investigation Team?

4 **A.** The Investigation Team made their own decision
5 as to whether they would be involved in the
6 investigation, with a view of criminal
7 prosecution and, if they did, then they had the
8 trump card. And so the Contract Adviser
9 would -- if there was a criminal prosecution to
10 take place, then the Contract Adviser would
11 terminate the contract.

12 Clearly, the business wouldn't want to
13 reinstate a contract when the business was going
14 to proceed to prosecution. If the Investigation
15 Department decided not to investigate, looking
16 for criminal prosecution, then the Contract
17 Adviser would conduct the full investigation.

18 **Q.** I want to look at one of the situations where
19 there was an investigation, one of the case
20 studies that the Inquiry will be looking at in
21 much more detail in due course. It's involves
22 the prosecution of Suzanne Palmer, who is a Core
23 Participant and sits within this room. Can we
24 go to the investigation report that was
25 prepared, it's POL00053007. Can we zoom out,

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1 accept that that is a very significant decision
2 to make?

3 **A.** Absolutely.

4 **Q.** The difference between the precautionary
5 suspension and the termination is you have time
6 to investigate?

7 **A.** That's right.

8 **Q.** Who carried out that investigation?

9 **A.** If there was a potential for a criminal
10 investigation to take place, then the main
11 investigation was taking place -- took place by
12 the Investigation Team themselves and, if not,
13 the Contract Adviser would interview the
14 subpostmaster and establish -- well, that was
15 before termination, clearly -- establish whether
16 to terminate, or reinstate, or reinstate with
17 conditions.

18 **Q.** Right at the beginning of your evidence, when we
19 discussed when an Auditor might involve the
20 Investigation Department, you referred to the
21 £1,000-figure as being indicative of whether it
22 may be referred to the Investigation Department
23 or not and we went to the Suspension Guidelines,
24 which use the same figure.

25 In most cases that you dealt with of

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1 thank you. Do you recognise this type of
2 document?

3 **A.** Yes, this is a report from the Investigation
4 Department.

5 **Q.** When would you come across these in your
6 practice as a Contract Adviser?

7 **A.** It would be presented probably to the
8 termination of the contract and after
9 suspension.

10 **Q.** Would this be a significant document that you
11 would take into account as part of the decision
12 as to whether or not to terminate the contract?

13 **A.** Yes, that's right.

14 **Q.** We see designated prosecution authority towards
15 the bottom, Tony Utting. Did you work often
16 with Mr Utting?

17 **A.** Mr Utting was part of the Investigation Team.
18 I wasn't but I certainly recognised the name and
19 I believe Lisa Allen produced this report and,
20 again, she was an Investigator who produced this
21 and a number of other reports which I saw.

22 **Q.** You're referred to as the "Discipline Manager".

23 **A.** Mm, odd title.

24 **Q.** Sorry, I spoke over you, then?

25 **A.** I spoke over you, sir, but just to say it's

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1 an odd title, "Discipline Manager". We talked
 2 about employment law and contract law before.
 3 **Q.** Yes, we said exactly that, disciplinary
 4 procedures. The fact your title was Discipline
 5 Manager suggests that this was seen as
 6 a disciplinary procedure; do you agree?
 7 **A.** It was a contractual matter that I was dealing
 8 with, it was a criminal matter that the report
 9 was dealing with.
 10 **Q.** Can we go to page 6, please. We see this is
 11 a document by Lisa Allen, so she's the
 12 investigation manager, on 20 February 2006. To
 13 what extent, if at all, would you have had any
 14 input into Lisa Allen's investigation?
 15 **A.** I believe on this occasion the auditors found
 16 a discrepancy, a deficiency, in the office
 17 accounts and it just happened that on the day
 18 Lisa Allen, the Investigator, was available, and
 19 so -- I believe she went to the office on the
 20 day and completed the report. I can't be
 21 certain it was on the day but I think it was or
 22 possibly the next day.
 23 **Q.** In preparing this report and you made the
 24 decision to suspend on 3 February and
 25 subsequently made the decision to terminate, as

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1 I wouldn't have questioned them, no. It
 2 wouldn't be Lisa's decision.
 3 **Q.** It says, the third paragraph up:
 4 "A discipline report has been forwarded to
 5 Alan Lusher."
 6 What was a discipline report?
 7 **A.** I believed that refers to this report.
 8 **Q.** That document can come down. The Inquiry has
 9 seen evidence of very significant discrepancies
 10 being reported and investigated, upwards of
 11 £100,000. As part of your investigation, did
 12 you ever investigate whether there had been
 13 an actual loss, such as by trying to trace where
 14 allegedly lost money had gone?
 15 **A.** We're not talking about Suzanne Palmer --
 16 **Q.** No, sorry, I'm talking generally.
 17 **A.** -- because her's were nothing like so large.
 18 You're asking if investigations were made when
 19 very large sums went missing?
 20 **Q.** No. Well, let's not limit it to large sums. As
 21 part of your investigation, did you ever try to
 22 trace where allegedly lost money had gone? So
 23 there was a discrepancy on Horizon but did you
 24 try to see if, for example, you could trace
 25 where the money had gone, maybe into the

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1 part of the process of determining whether or
 2 not you would terminate Mrs Palmer's contract,
 3 how often, if at all, did you speak to Ms Lisa
 4 Allen?
 5 **A.** The information that I would need from the
 6 report was whether there was going to be
 7 a criminal prosecution. I don't recall speaking
 8 to Lisa Allen in 2006. I may or may not have
 9 spoken to Lisa about the report.
 10 **Q.** So what you said there was "The information that
 11 I would need from the report was whether there
 12 was going to be a criminal prosecution".
 13 **A.** Yes.
 14 **Q.** If there was going to be a criminal prosecution,
 15 would you effectively see that as it has to be
 16 a termination?
 17 **A.** Yes.
 18 **Q.** Why?
 19 **A.** It would be -- for Post Office Limited to be
 20 pursuing a criminal prosecution and then
 21 reinstating a contract, would seem to be
 22 incongruent, silly.
 23 **Q.** Did you ever question decisions as to whether or
 24 not to prosecute?
 25 **A.** They were made at a very high level and

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1 subpostmasters's bank account or into a safe at
 2 home?
 3 **A.** Limited attempt. The investigation Team would
 4 go into much more detail.
 5 **Q.** When you say "limited attempts" by yourself,
 6 what would those limited attempts be?
 7 **A.** It would be asking the subpostmaster where the
 8 sums of money had gone. There wouldn't be any
 9 detailed investigation beyond that, I don't
 10 believe.
 11 **Q.** What if they said, "I don't know because
 12 I haven't stolen them?"
 13 **A.** I wouldn't be in the business of accusing
 14 anybody of stealing money. I would be in the
 15 business of finding that there was a deficiency
 16 in the account, which could possibly warrant
 17 suspension and/or termination.
 18 **Q.** As part of your investigation, would you ever
 19 request audit data or ARQ data from Fujitsu?
 20 **A.** You referred to ARQ data this morning. I can't
 21 quite remember what it was because I'd never
 22 heard of it before. But no, is the answer to
 23 the question, I would never refer to Fujitsu for
 24 information.
 25 **Q.** Why not?

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1 A. I didn't have the avenue through which to do
2 that.

3 Q. Did you think it would have helped you, if
4 you're trying to determine the cause of
5 a discrepancy, to be able to see the more
6 detailed audit data collected by Horizon?

7 A. Yeah, potentially could, yes.

8 Q. In relation to who made the decision to
9 terminate, you say a similar thing, that
10 initially a Contract Adviser with input from
11 a senior manager, and over time that changed;
12 are the timings the same as for with suspension?

13 A. The Contract Advisers had a monthly appraisal
14 meeting with the Senior Managers and, on each
15 occasion, any cases such as these suspensions,
16 terminations, would be discussed, and so the
17 opinion and guidance of the senior manager would
18 always be in the decision-making process.

19 Q. But in terms of when the actual decision making
20 went to the senior managers, rather than in
21 consultation with, did that transfer about the
22 same time as for suspension?

23 A. Probably yes, possibly earlier.

24 Q. We've discussed that subpostmasters aren't
25 employees but, often in an employment context

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1 A. That's right.

2 Q. Do you see a problem with that?

3 A. The Senior Managers are always involved in that
4 decision-making process.

5 Q. How does that address the problem with the
6 Investigator making a decision on their own
7 investigation?

8 A. I didn't say I found that to be a problem, did
9 I?

10 Q. Okay, you don't consider it to be a problem; is
11 that your evidence?

12 A. No, I don't see that as a problem.

13 Q. So during an interview were there ever occasions
14 when a subpostmaster may criticise the extent of
15 the investigation and say more evidence is
16 needed?

17 A. It may have been the case, I can't recall.

18 Q. If such a criticism was made, would you feel
19 that you, as a Contract Adviser who's done the
20 investigation, would you feel that you would be
21 able to impartially assess that, whether the
22 investigation itself was adequate?

23 A. If there was something specific that the
24 subpostmaster wished to raise, then that could
25 be a new avenue of investigation, which the

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1 where there's an allegation of misconduct of
2 some sort, you may expect to see
3 an investigating officer and a separate decision
4 maker; would you agree with that?

5 A. I don't know, I haven't dealt with such things.

6 Q. Can we please turn in your witness statement to
7 page 39, paragraph 141. Thank you. You say:
8 "At interview, evidence would be heard from
9 the SPM and the Contract Adviser."
10 Who would hear the evidence?

11 A. The Contract Adviser would put forward the
12 evidence that they had, the subpostmaster would
13 put forward evidence that they had, and the
14 Contract Adviser, often with the assistance of
15 the friend, member of the Federation of
16 SubPostmasters, normally very helpful -- then
17 the Contract Adviser would arrive at a decision
18 jointly or with senior management, subsequently.

19 Q. So the Contract Manager does the investigation
20 or it may be the Investigation Department,
21 there's then the meeting, the Contract Manager
22 puts forward all the evidence and then the
23 Contract Adviser again or Manager makes
24 a decision. There's no separation between
25 investigation and decision making?

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1 Contract Adviser could then explore.

2 Q. How often in your experience did a subpostmaster
3 raise a new area of investigation and that was
4 then followed, following an interview?

5 A. Can't recall any specific occasions, sir.

6 Q. I want to briefly look at appeals and at
7 paragraph 146 and 147 of your statement, please
8 it's page 40, you say that:
9 "The SPMs did, however, have the right to
10 appeal a decision to terminate their contract.
11 Appeals were heard only by especially trained
12 senior managers."
13 You say you recall taking notes but you
14 didn't actually conduct an appeal yourself.

15 A. Appeals had to be heard by Senior Managers and
16 I never achieved that status, sir.

17 Q. In paragraph 150, you refer to being consulted
18 on revisions to appeals policies and to
19 arranging training.

20 A. Yes.

21 Q. Why were you consulted on appeals policy if you
22 weren't running appeals yourself?

23 A. I think for a time -- this was when I was
24 termed, I believe, a Commercial Contract Adviser
25 and not doing the ordinary role of a Contract

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1 Adviser. But, at the time, the appeals were
 2 almost all heard by just one Appeals Manager,
 3 Andy Bayfield, and the decision was taken that
 4 a panel should be established, as had previously
 5 been the case, I believe, some years prior.
 6 Is the connection satisfactory, sir?
 7 **MR STEVENS:** I think --
 8 Sir, can you see and hear us?
 9 **SIR WYN WILLIAMS:** Yes.
 10 **MR STEVENS:** I think it may have just been the
 11 screen.
 12 **THE WITNESS:** The screen went off.
 13 **SIR WYN WILLIAMS:** Currently on my screen, I've got,
 14 just so everybody knows, I've got the witness
 15 statement at paragraph 150.
 16 **MR STEVENS:** Yes, sorry, that can come down. Thank
 17 you, sir.
 18 **A.** Sorry, the question was why did I become
 19 involved in a revision of appeals process when
 20 I wasn't involved in appeals.
 21 **Q.** Yes.
 22 **A.** And the answer is that, at the time when I was
 23 a Commercial Contract Adviser, just one person,
 24 Andy Bayfield, was concerned with conducting all
 25 appeals throughout the country and the decision
 97

1 some but not very many.
 2 **Q.** In practice, was allowing an appeal frowned upon
 3 within the Post Office?
 4 **A.** Oh, no.
 5 **Q.** Why do you say that?
 6 **A.** From a Contract Adviser perspective, the --
 7 an appeal would be welcome because that would
 8 give the -- somebody else the opportunity to
 9 review the entire case. The appeal was not
 10 based on the Contract Adviser's investigations,
 11 or findings but there was a completely fresh
 12 rehash of the case from stage one, always
 13 conducted by a Senior Manager.
 14 **Q.** I've got three disparate topics now. One of
 15 them is back to the prosecution of Mrs Palmer.
 16 There's going to be more questions coming but
 17 I'm only going to focus on one particular
 18 element. Firstly, could you just briefly say
 19 overall what your role was in that prosecution?
 20 **A.** I had no role in the prosecution, sir.
 21 **Q.** If we can turn, please, to POL00052988. This is
 22 a letter dated 8 November 2006. It's from
 23 Miss J Andrews in the Criminal Law Division, and
 24 addressed to, we see, Investigation Team but
 25 "cc Lisa Allen". It refers to *Post Office v*
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1 was taken to form a panel of Appeals Manager
 2 with specific training, in order to alleviate
 3 the workload. And I was asked, really --
 4 I think the policy was just a question of
 5 pulling together whatever had been there before
 6 into a consolidated piece of work and then
 7 assisting with the training of the new Appeals
 8 Managers.
 9 I think my experience as an auditor was
 10 quite useful in that, just to help to train the
 11 Appeals Managers.
 12 **Q.** Are you aware of how frequently appeals would be
 13 allowed?
 14 **A.** Yes, I think there was -- in the pack, there was
 15 some statistics which indicated in the order of
 16 35/40 appeals a year, if my memory serves me,
 17 but that was from the pack which was provided to
 18 me.
 19 **Q.** Well, if it's from the pack, we can consult the
 20 documents in due course but, from your memory,
 21 you don't have a recollection of how many
 22 appeals were allowed, as in initial decisions
 23 overturned?
 24 **A.** Oh, I see what you mean. Decisions overturned,
 25 I don't really recall that number. There were
 98

1 *Palmer* with a pre-trial review on 8 December.
 2 If we could just move down slightly, please.
 3 Thank you.
 4 The third paragraph says:
 5 "The witnesses required to give evidence at
 6 Trial are Peter Riches, Alan Lusher, Anil
 7 Chowdhry and Nick Kerr."
 8 Do you recall giving evidence in the trial?
 9 **A.** No. I did not give evidence at the trial.
 10 **Q.** Did you give a witness statement?
 11 **A.** I may well have done. I cannot recall.
 12 **SIR WYN WILLIAMS:** I think the reality is that you
 13 must have done because a witness order or
 14 a request that somebody gives evidence must be
 15 preceded by a witness statement in a criminal
 16 case.
 17 **A.** Thank you, sir. In that case, I must have done.
 18 **MR STEVENS:** That document can come down. Can we
 19 please then go to POL00052997. It's a letter
 20 dated 19 January 2007, again to the
 21 Investigation Team, cc Lisa Allen, but at the
 22 bottom, we see that it's from Jarnail Singh.
 23 Did you work with Jarnail Singh at all or do you
 24 know who he was?
 25 **A.** I may have been aware of him at the time, sir,
 100

1 and it's clear that he's on the Criminal Law
2 Division, so not really closely related to the
3 contract issues.

4 **Q.** The letter refers to receiving:
5 "... a letter from the Defence Solicitors
6 with regard to disclosure of any Post Office
7 accounting records that show Mrs Palmer did
8 periodically repay the Post Office large sums of
9 money representing scratchcard receipts. They
10 inform me that Prosecution Counsel gave
11 an indication on 8 December 2006 at Court and we
12 asked the Investigation Officer and his
13 understanding was that such records did exist.
14 However no such records have been disclosed.
15 Could you please look into this and let me have
16 your response urgently."

17 Can you recall ever being approached to
18 provide documents in relation to this case, in
19 particular, accounting records?

20 **A.** No, I can't, and the request would have gone to
21 the Accounting Department, rather than to
22 myself, I believe.

23 **Q.** Thank you. Now, the second topic I had, if you
24 bear with me, sir, I need to open the [draft]
25 transcript.

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1 given ..."

2 Then it breaks off. Your reference there to
3 a statement to read out with application
4 interviews, which the Legal team had prepared to
5 assure people that the Horizon system was sound,
6 could you please just expand on what that was?

7 **A.** One of the key jobs of Contract Adviser was
8 application interviews for new subpostmasters
9 and, as part of the interview process,
10 a document had been prepared by the Legal team
11 either to read out to refer to or I believe to
12 actually hand to the applicant at some stage
13 during the interview process.

14 **Q.** Do you recall what that document said?

15 **A.** Not specifically but it was to give assurance
16 that the Horizon system was sound.

17 **Q.** Do you remember when that was -- can you be
18 precise as to when that document was brought in?

19 **A.** I can't be precise but on the continuum we've
20 referred to it as, you know, 2012 or thereafter.

21 **Q.** Can you remember who precisely instructed you to
22 use that document?

23 **A.** Well, the instruction came through my line
24 manager but it was produced, I believe, by the
25 Post Office solicitors.

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1 Thank you, yes, this morning, I asked you
2 questions about where assurance came in respect
3 of Horizon's reliability, and we had
4 a discussion and you referred to senior
5 management, et cetera. Reading from the [draft]
6 transcript, the question I asked was:
7 "When you say you were advised by Post
8 Office Limited, who in particular assured --
9 gave you that assurance?"
10 I'll then read your answer back to you. You
11 said:
12 "Well, the discussion came up in team
13 meetings on a fairly regular basis, not exactly
14 sure of the dates, but the first inklings of
15 activity in 2004/2005, something like that,
16 right through to the end there, was kind of
17 a continuum of all things. The pressure got
18 increased, as it were. Initially there's not
19 too much consideration given to it ..."

20 This is the part I want to ask you about:
21 "... but latterly the Post Office does
22 [inaudible] a statement to read out with
23 application interviews which the Legal team had
24 prepared to assure people that the Horizon
25 system was sound, and so, you know, latterly,

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1 **Q.** Who was your line manager at that time?

2 **A.** Lin Norbury.

3 **Q.** It was Lin Norbury. Thank you.

4 The final question then I have, please, or
5 set of questions sorry, could we turn up
6 POL00041476, and if we could go to the last
7 page, please, page 4. So this is an email from
8 you to Paul Inwood on 14 June 2017. We don't
9 have the attachment but it says:
10 "Hi Paul
11 "I would appreciate advice on the best way
12 to proceed with this case."
13 Why would you have approached Paul Inwood in
14 these circumstances?

15 **A.** The email is copied Lin Norbury, my immediate
16 line manager and Paul Inwood was, I believe,
17 involved in putting together contracts but also
18 had a close interest in the Horizon Issues. We
19 note that this is much later in 2017, much later
20 on my continuum --

21 **Q.** Continuum, yes.

22 **A.** -- when there was general concern in the
23 business about the Inquiry and Horizon
24 difficulties.

25 **Q.** Could we go over the page, please, to

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1 Mr Inwood's response -- thank you. Just to see,
2 for the chronology purposes, he responds asking
3 for more information. The actual content of
4 advice is not necessary for the question I'm
5 going to ask. What I want to ask is your email,
6 which is immediately above. This is from you
7 back to Paul Inwood on 31 August. You say you
8 have made enquiries with Angela van den Bogerd,
9 having no recollection, et cetera. Your
10 penultimate paragraph says:

11 "Please advise whether I should proceed with
12 this case differently in any way because of the
13 implication of problems with the Horizon
14 system."

15 Now, were you requesting whether you should
16 do something differently because of the ongoing
17 litigation concerning Horizon at that point?

18 **A.** Yes.

19 **Q.** Why did you think it necessary to ask whether
20 you should proceed with the case in a different
21 manner?

22 **A.** You'll forgive me if I pronounce the name wrong
23 but Pentyrch is an office, I believe, in Wales
24 and I live in Norfolk. The case was passed to
25 me to deal with, kind of specially, because

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1 Participants.

2 Firstly, Mr Enright for Howe+Co.

3 **SIR WYN WILLIAMS:** Over to you, Mr Enright, and
4 I can see that Mrs Palmer is with you so give
5 her my regards.

6 **MR ENRIGHT:** I will do, sir, thank you.

7 **Questioned by MR ENRIGHT**

8 **MR ENRIGHT:** Mr Lusher, I am David Enright and I'm
9 the recognised legal representative for 156
10 subpostmasters and managers, including Ms Palmer
11 who sits beside me. I saw you looking earlier.
12 Do you remember Ms Palmer?

13 **A.** I do indeed.

14 **Q.** You were Ms Palmer's Contract Manager?

15 **A.** I'm not certain --

16 **Q.** You were Ms Palmer's Contract Manager, correct?

17 **A.** I'm not certain whether I was her designated
18 Contract Manager but I definitely dealt with the
19 case.

20 **Q.** You dealt with the case?

21 Ms Palmer appeared before the Inquiry on
22 23 February 2022 and she referred to you in her
23 evidence. Did you watch her evidence then or
24 later?

25 **A.** No.

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1 there was concerns around the Horizon system,
2 I believe, which had been brought up by the
3 subpostmaster in this case. So, in a way, I was
4 just the lowly Contract Adviser dealing with the
5 regular letters to be sent in this case but took
6 advice from, you know, very senior managers,
7 obviously Paul Inwood carried the case forward
8 to a senior legal expert in the business, and so
9 I was just merely doing, as it were, the donkey
10 work to start the process on this case.

11 **Q.** So, in practice, around this time when the Group
12 Litigation was ongoing, if you had a query as
13 Contract Adviser which raised a Horizon issue,
14 it would be normal practice to raise that up to
15 senior management for guidance on what to do?

16 **A.** I do want to say I wasn't working as a kind of
17 ordinary Contract Adviser in that time from --
18 it was about 2010 onwards but, on odd occasions,
19 was asked to deal with specific cases and when
20 Horizon was mentioned as an issue, then,
21 certainly the matter would be referred to senior
22 managers and lawyers.

23 **MR STEVENS:** Thank you. That concludes all the
24 questions that I have.

25 Sir, there are questions from two Core

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1 **Q.** Did you watch the evidence of any of the
2 postmasters who gave Human Impact evidence?

3 **A.** No, I haven't done so, sir.

4 **Q.** Okay. Ms Palmer also produced and provided
5 a witness statement to this Inquiry, and I'd
6 like to take you to two paragraphs of that
7 statement. I'd be very grateful if we could
8 bring up WITN02240100. This is the witness
9 statement of Ms Palmer. If you'd be kind enough
10 to take us to page 12, I'm looking at
11 paragraph 55, Mr Lusher. Ms Palmer said in her
12 statement:

13 "I also attended an interview with Alan
14 Lusher (Contracts Manager) in or around March
15 2005. I went through everything with Alan, and
16 explained my accounting process. He could see
17 that had done it incorrectly but this was
18 naivety of the system rather than malicious.
19 Alan tried to stop the prosecution but explained
20 that the decision to prosecute most made by
21 a separate team."

22 So Ms Palmer says that you understood her
23 position and tried to help her. Do you remember
24 this?

25 **A.** I certainly remember the interview, specifically

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1 because Ms Palmer was extremely upset at the
 2 time, at the prospect of losing the office.
 3 **Q.** So you met her because you remember her being
 4 deeply upset?
 5 **A.** Yes, yes, yes.
 6 **Q.** Did you promise to help her in any way?
 7 **A.** I would have promised to do anything that was
 8 within my power to assist her and ensure that
 9 justice was carried out fairly.
 10 **Q.** Do you recall saying to her that you understood,
 11 you could see there was a muddle here, there was
 12 naivety here, there was not criminality here?
 13 **A.** I wouldn't go that far, sir, no.
 14 **Q.** Okay. So you didn't do anything to try to stop
 15 her prosecution then, I take it?
 16 **A.** The decision on whether to prosecute or not was
 17 not at all within my remit, sir.
 18 **Q.** All right. You'll, of course, recall, certainly
 19 having heard the evidence, that Ms Palmer was
 20 prosecuted by the Post Office, was tried on
 21 three counts of false accounting? You shake
 22 your head --
 23 **A.** Yes, I've seen the evidence. Yes.
 24 **Q.** Do you recall that a jury acquitted her on all
 25 counts in January 2007?

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1 **A.** Yes, I referred the matter to my line manager.
 2 I believe when I first hesitated, when you asked
 3 me if I was Ms Palmer's Contract Manager, it's
 4 because the branch is quite a long way from
 5 where I live and was most probably within the
 6 area of another Contract Adviser, but we worked,
 7 you know, in teams, so if the other Contract
 8 Adviser's workload was heavy, I would take on
 9 a case, and my line manager at the time, Lin
 10 Norbury, I believe, referred the matter after
 11 we'd heard about the not guilty verdict to
 12 a Contract Manager who looked after the area,
 13 Carole Ballan.
 14 **Q.** What was the name of that person?
 15 **A.** Carol Ballan.
 16 **Q.** Thank you. Did you discuss this matter with
 17 Carol?
 18 **A.** Um --
 19 **Q.** You must have, obviously because you raised it
 20 with her.
 21 **A.** I raised it with Lin Norbury, my line manager,
 22 who was also the line manager of Carol Ballan.
 23 **Q.** Did you give a recommendation about what should
 24 be done after she had been acquitted of all
 25 charges?

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1 **A.** I have heard that that was the case, sir, yes.
 2 **Q.** Okay. I'd like to go to paragraph 14 of her
 3 witness statement, it's at page 14 of that
 4 statement I'm looking at paragraph 68, and this
 5 what Mrs Palmer says she did immediately after
 6 being acquitted:
 7 "I called Alan Lusher the day that the
 8 verdict was handed down and told him that I was
 9 found not guilty. He was really pleased with
 10 this. However, I had been through months of
 11 hell, and even though I was proved innocent the
 12 Post Office took away my job, my income, my
 13 business and my future."
 14 So the questions I have for you are these:
 15 were you happy that Mrs Palmer was acquitted?
 16 **A.** Yes, sir, I was.
 17 **Q.** Do you remember that phone call when she rang
 18 you to tell you?
 19 **A.** Yes, I do recall.
 20 **Q.** Given that, did you escalate Ms Palmer's
 21 position with Post Office after her acquittal to
 22 see what could be done about reinstating her
 23 after she had been acquitted of any wrongdoing?
 24 **A.** Did I escalate?
 25 **Q.** Yes.

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1 **A.** The criminal case had been put forward, been
 2 challenged in court, clearly found not guilty,
 3 but the contract had already been terminated at
 4 that stage.
 5 **Q.** We're not entirely clear whether you were her
 6 Contract Manager or not. It does appear that
 7 you were. Wasn't it part of your job as
 8 a Contract Manager to intervene when the Post
 9 Office got it wrong? Shouldn't you advocate for
 10 someone who had been wrongly prosecuted and
 11 found not guilty?
 12 **A.** The Investigation Team would be at least as
 13 responsible to admit that they'd got it wrong,
 14 if that was the case.
 15 **Q.** I appreciate what they may or may not have done
 16 but I'm talking about you, as her Contract
 17 Manager. You know, a manager is not all about
 18 negative, a manager is also about positive --
 19 **A.** Yeah, of course. We're dealing with 2006 and
 20 I don't recall the specific conversations around
 21 this part. I mean, there are elements of the
 22 case -- you know, I was asked to deal with
 23 another case with Ms Palmer, so I've been
 24 familiarised with the case over the recent
 25 years. But I don't recall specific detail from

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1 2006.

2 **Q.** I want to ask you one further question on that

3 because you have said you remember the name of

4 the person who you raised it with it, so you do

5 remember Ms Palmer being acquitted. You do

6 remember raising it with your line manager.

7 **A.** Yeah, yeah.

8 **Q.** Did you advocate for Ms Palmer? Did you suggest

9 she should be reinstated?

10 **A.** I wouldn't have suggested that she be

11 reinstated.

12 **Q.** Well, Ms Palmer was acquitted of all charges

13 brought against her by the Post Office and yet

14 she lost her livelihood, her home and her

15 reputation. Is there anything you'd like to say

16 to her today?

17 **A.** I'm very, very sorry that things have panned out

18 how they have for Ms Palmer. I certainly

19 remember her being a particularly pleasant

20 person, easy to deal with and I also remember

21 thinking specifically that the interview which

22 we referred to, had that been an application

23 interview, she would have been a very good

24 candidate to be a subpostmistress, and that's

25 the truth, sir. I'm very sad for the way things

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1 **Q.** What I'd like to do is just look at the bottom

2 of page 33 and going into page 34. So just

3 pausing there, this the bottom of page 33, and

4 this is about sub post office branch behaviour

5 in relation to what the report terms

6 non-conformance, and we can see that there's

7 a breakdown of various different types of sub

8 post offices and the percentage of them which

9 fail audits.

10 So we can see there that offices with no

11 DVLA applications failed 23 per cent of the

12 time, which is relatively high but, if we go all

13 the way down to the bottom where they have no

14 additional services, no ATM, no Camelot, no

15 DVLA, no automated payments, et cetera, there's

16 just a 1 per cent failure rate; do you see that?

17 **A.** Yes. It would be helpful if we could decide

18 what a failed audit means.

19 **Q.** Well, it says here at the top:

20 "SPMR failure rates appear to be very much

21 determined by which services they do not offer.

22 Removing the ATM reduces the risk of SPMR being

23 suspended, as does the presence of Lottery

24 tickets ..."

25 So I think what it's referring to is when

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1 have turned out for you.

2 **MR ENRIGHT:** Thank you very much, Mr Lusher.

3 **SIR WYN WILLIAMS:** Who else wants to ask Mr Lusher

4 questions?

5 **MR STEVENS:** Ms Page from Hodge Jones & Allen.

6 **Questioned by MS PAGE**

7 **MS PAGE:** Thank you, sir.

8 Mr Lusher, I ask questions on behalf of

9 another group of subpostmasters and there's just

10 one document that I'd like to take you to. It

11 is POL00029677. While it's coming up,

12 Mr Lusher, it is a -- well, here it is. It's

13 the Detica NetReveal review of "Fraud and

14 Non-conformance in the Post Office". This took

15 place on 1 October 2013. Did you hear anything

16 about that or know anything about that?

17 **A.** I've read this report and I can't be sure.

18 I believe I was invited to give information to

19 one of the researchers before the report was

20 produced.

21 **Q.** You didn't read it at the time, though, or did

22 you?

23 **A.** Oh no, this wouldn't have been presented to my

24 level. This would have been for board level,

25 I guess.

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1 an audit leads to suspension.

2 **A.** Okay.

3 **Q.** Does that make sense?

4 **A.** Yes, it does, yeah.

5 **Q.** We then go over the page and it talks about

6 multiple sub office behaviour, and what it says

7 is:

8 "Multiple sub post offices are by far the

9 weakest performers in terms of conformance.

10 Once again, the absence of the ATM appears to

11 reduce the risk, however, the failure rate is

12 still considerably above the average, which is

13 about 14%."

14 Then it says that there's, in the --

15 **A.** Ah --

16 **Q.** Sorry.

17 **A.** May I just interrupt?

18 **Q.** Certainly.

19 **A.** Sorry to interrupt, but the title of this

20 paragraph is "Multiple sub post office

21 behaviour" and multiple subpostmasters, to me,

22 means the branch is operated by the Co-op or One

23 Stop.

24 **Q.** Exactly.

25 **A.** But the cluster name is MSPO_3 and that's

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1 a modified sub post office contract and I wonder
2 whether we could just clarify whether we're
3 referring to the post offices under the modified
4 contract or multiple sub post offices.

5 **Q.** In the context of the report it's pretty clear
6 they're talking about multiples, which is really
7 why I draw it to your attention because it is
8 one of the areas where you ended up doing a lot
9 of work, isn't it?

10 **A.** Indeed, yes.

11 **Q.** We can see that because below there's also
12 a reference to chain franchise behaviour and so
13 that's a different form again, isn't it, where
14 you have chain franchise; is that right?

15 **A.** Yes, that's something different.

16 **Q.** So just to return back to the paragraph dealing
17 with multiples, we can see that there's
18 a description of "High stock discrepancy, Unpaid
19 cheque [transactions]", and that's, I think,
20 a type of failure and we see that 50 per cent of
21 the multiples are failing in that regard.

22 Then when we have multiples which do
23 everything, 36 per cent are failing; and then
24 when we have no ATM, 21 per cent are failing;
25 all of which are higher than the failure rates

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1 **A.** Yes, I'd say that's the case. But by the
2 operators themselves, the multiple partners,
3 then they dealt with matters in their own way.

4 **Q.** Well, yes, they did, and what it looks like is
5 that they didn't deal with it in a way that
6 produced the same levels of conformance that
7 subpostmasters produced?

8 **A.** From these figures, it would seem that what you
9 say is correct.

10 **Q.** So what we perhaps might draw from this is
11 a culture in the Post Office which took
12 advantage of a power imbalance between the Post
13 Office and the subpostmaster, in comparison to
14 a more bilateral less imbalanced relationship
15 between the Post Office and chains like the
16 Co-op.

17 **A.** I accept that the -- because of the figures in
18 front of me, the effect of action taken by the
19 multiple partners was less effective, can't be
20 disputed because of the figures you present or
21 the figures that are presented in this report.
22 But, in terms of favouritism or a different
23 approach from the Post Office, the mechanisms of
24 the approach were different, as I explained, but
25 not a matter of favouritism, I wouldn't have

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1 that we saw with reference to single
2 subpostmasters.

3 Were you aware that multiples were much more
4 prone to non-conformance and failure of audits
5 than single subpostmasters?

6 **A.** No, I wasn't aware. Multiple sub post offices,
7 if there was an audit discrepancy, then with
8 an independent subpostmaster, we follow the
9 procedure which we have discussed at length
10 today of suspension and interviews and
11 terminations, and so on. But with the multiple
12 partners, then they themselves would deal
13 internally with issues at branch, so they may
14 choose to terminate the employment contract of
15 their manager, for example, and replace them
16 with somebody else, or come to whatever
17 arrangement they chose. So that the issue
18 wouldn't be so onerous on the Contract Adviser
19 to deal with.

20 **Q.** No. It appears, doesn't it, from what Detica
21 NetReveal have found, is that multiples were
22 given really rather more latitude than single
23 subpostmasters in terms of non-conformance?

24 **A.** By the Post Office.

25 **Q.** Yes?

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1 said.

2 **Q.** Can I just ask, very briefly, one more thing.
3 That document can come down. This is just
4 a question that arises from the document you've
5 seen already, on a different subject, the emails
6 about the Post Office at Rivenhall and the
7 exchange that you had with Mr Winn, who informed
8 you that Fujitsu had the ability to impact on
9 branch records via the message store. Were you
10 aware that that email exchange became a point of
11 focus during the Second Sight investigation?

12 **A.** I haven't followed the investigation closely.

13 **Q.** Did anyone talk to you about it during the
14 Second Sight investigation?

15 **A.** No.

16 **MS PAGE:** Thank you. Those are my questions.

Questioned by SIR WYN WILLIAMS

18 **SIR WYN WILLIAMS:** Thank you, Ms Page.

19 I do have a few questions to ask you,
20 Mr Lusher.

21 Could we have Mr Lusher's witness statement
22 on the screen at paragraph 66, just so we can
23 look at the contractual provision again.
24 Paragraph 66 is on page 19. If you scroll up,
25 there we are, that's fine.

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1 You've very properly set out in paragraph 66
2 that your understanding is summed up by the
3 contractual provision which you then cite, yes?

4 **A.** Yes, sir.

5 **SIR WYN WILLIAMS:** Mr Stevens showed you a number of
6 documents or at least some documents -- don't
7 let's exaggerate it -- which tended to suggest
8 that the subpostmaster was responsible for all
9 losses, full stop, so to speak, and so there was
10 a difference between the strict contractual
11 provision and some of the documents produced by
12 the Post Office, yes?

13 **A.** Yes, that's quite true, sir.

14 **SIR WYN WILLIAMS:** Right. Now, what I want to ask
15 you about is your knowledge of what happened in
16 practice. Can I take it -- and we'll pick up
17 the train, so to speak, when the Auditor has
18 reported to the Contract Adviser that there's
19 a loss showing at a particular branch, all
20 right?

21 **A.** Mm-hm.

22 **SIR WYN WILLIAMS:** So a decision has to be made by
23 the Contract Adviser as to suspension or not,
24 and I take it that the Contract Adviser would be
25 asking himself the question: is the

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1 refer to the contract: carelessness, negligence,
2 or error.

3 **SIR WYN WILLIAMS:** So you personally would always go
4 on the contractual basis? Is that what you're
5 telling me?

6 **A.** Yes, sir, it is.

7 **SIR WYN WILLIAMS:** Right. Now, the other question
8 I want to ask you in relation to that is, in
9 your mind, was it for the Post Office to prove
10 that he was careless, negligent or in error, or
11 was it for the subpostmaster to prove that he
12 wasn't?

13 **A.** The Post Office would go some way to investigate
14 the situation, so that the Contract Adviser --
15 me myself, sir -- would be confident, to some
16 degree at least that there was carelessness,
17 negligence or error. The case would then be
18 rest to the subpostmaster for him to prove
19 otherwise. If the investigation revealed that
20 there was -- the loss was not caused through
21 carelessness, negligence or error, then there
22 would be a reinstatement.

23 **SIR WYN WILLIAMS:** Yes, but we haven't got to that
24 point yet because I'm talking about the
25 situation where you know from the Auditor that

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1 subpostmaster responsible for this loss? There
2 might be two ways of looking at that: (1)
3 strictly in accordance with the contract; or (2)
4 in accordance with what some policy documents
5 might describe as the responsibility for loss.

6 So two questions. First of all, when you were
7 a Contract Adviser, did you address that issue?

8 **A.** It's difficult to remember any specific
9 examples, sir, but my intention would always be
10 to be as fair and as just as possible with
11 a subpostmaster. It was rare, in the
12 circumstance that you referred to, an audit
13 taking place, it was rare to come across a loss
14 which wasn't caused by carelessness, negligence
15 or error, or by an assistant. The only examples
16 I can usually -- I could usually remember would
17 be in terms of robbery and burglary.

18 **SIR WYN WILLIAMS:** Yeah, I understand that, but what
19 I'm trying to get at is: were you applying
20 a test, which, in effect, was the postmaster is
21 responsible for all losses or were you applying
22 a test which was that he was responsible for
23 losses if he was careless, negligent or in
24 error?

25 **A.** The second is definitely the case, sir. I would

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1 there is a loss and now you're deciding whether
2 to suspend or not.

3 **A.** Okay.

4 **SIR WYN WILLIAMS:** My understanding is this all
5 happens very quickly -- on the same day,
6 usually. So there hasn't been an investigation;
7 there's simply been an audit. So in your mind,
8 if you can try and think back and be as
9 objective as possible, to repeat, were you
10 thinking to yourself "Well, the Post Office has
11 got to prove that he was careless, negligent or
12 in error", or were you thinking, "It's for him
13 to establish that in any subsequent
14 investigation?" -- (*Audio disruption*) -- I'm
15 sorry, in any subsequent investigation?

16 **A.** Yes. When the auditor would phone through with
17 the information that a loss had been discovered,
18 then that loss would be taken as a true
19 situation of accounts.

20 **SIR WYN WILLIAMS:** Yes.

21 **A.** And a suspension would, you know -- could follow
22 at that stage.

23 **SIR WYN WILLIAMS:** Right.

24 **A.** And, thereafter, that's where I described the
25 investigation taking place and then the

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1 subpostmaster, often with a friend from the
2 Federation, and the Contract Adviser getting
3 together to establish facts.

4 **SIR WYN WILLIAMS:** Yes, but so that I understand the
5 nature of that subsequent investigation, you
6 would be provided with what? That's not really
7 helpful to you.

8 **A.** Well --

9 **SIR WYN WILLIAMS:** You, first of all, get what sort
10 of documentation relating to the loss as found
11 by the Auditor?

12 **A.** Certainly, the audit report would be a key part
13 of the documentation received and then there may
14 be subsequent enquiries made to establish, for
15 example, were accounting documents relevant in
16 the particular case, training records and -- I'm
17 just trying to think -- any other information
18 that was available from the office records at
19 the time?

20 **SIR WYN WILLIAMS:** Right, but am I correct in
21 thinking that the first time you get the
22 subpostmaster's full explanation of why he
23 thinks that a loss has occurred is at the
24 interview that you've described occurring?

25 **A.** At the time of the audit, I would always want to
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1 meeting or following that meeting, when you were
2 making a decision, were you saying to yourself
3 "It's for the Post Office to demonstrate that
4 this postmaster had been careless, negligent or
5 in error", or were you saying to yourself, "He's
6 got to demonstrate that he hadn't been careless,
7 negligent or in error"?

8 **A.** The second, sir. The subpostmaster would be
9 required to come up with evidence that he hadn't
10 been careless, negligent or in error.

11 **SIR WYN WILLIAMS:** Thank you. Yes, that's very
12 helpful. Thanks very much.

13 Sorry for prolonging your stay in the
14 witness box but thank you for making your
15 witness statement and thank you for giving
16 evidence before me today.

17 **THE WITNESS:** Thank you very much, sir.

18 **SIR WYN WILLIAMS:** So Mr Stevens, we recommence
19 tomorrow morning at 10.00, yes?

20 **MR STEVENS:** Yes, for Alison Bolsover.

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

22 **MR STEVENS:** Thank you.

23 (4.22 pm)

24 (The hearing adjourned until 10.00 am
25 the following day)

1 speak to the subpostmaster to establish whether
2 there was an immediate response to that
3 question.

4 **SIR WYN WILLIAMS:** So are you saying that you would
5 speak to the subpostmaster, if you could, on the
6 day of the audit --

7 **A.** Yes.

8 **SIR WYN WILLIAMS:** -- to get an explanation and
9 then, subsequently, he having been suspended,
10 there then will be what I'll call a secondary
11 process, in which you're deciding, in effect,
12 whether to lift the suspension or terminate the
13 contract and, at that stage, he would have
14 another opportunity to give his version of what
15 he thinks had occurred?

16 **A.** Yes, that's quite right, sir. The initial
17 questions would be over the phone at the time of
18 the audit and the secondary investigation you
19 referred to would be after there'd been time to
20 gather together documents, information, and so
21 on.

22 **SIR WYN WILLIAMS:** Right. So at that secondary
23 investigation -- let me ask you the same
24 question that I asked you in relation to the day
25 of the audit. At that secondary -- or at that
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